



Alabama Department of Environmental Management  
adem.alabama.gov

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March 22, 2013

MAJ Anthony Bryant  
111 S George Mason Dr  
Arlington, VA 22204-1373

**RE: ADEM Response: Remedial Investigation (RI) Report Revision 1**, dated December 11, 2012.  
Mobile OMS-28, Mobile County, Alabama  
DSMOA ID: 535-223-0031

Dear Mr. Bryant:

The Alabama Department of Environmental Management (ADEM or the Department) has received the Alabama National Guard's (ANG) subject document. The Department has determined that the RI Report does not adequately characterize the contamination at Mobile OMS-28.

A revised RI Report addressing all comments should be submitted to the Department for review within 45 days of receipt of this correspondence. Comments are provided in the attached document. Responses may be submitted in the form of a revised RI Report or appropriate revised pages and figures to be inserted in the original submission. If ANG chooses to submit revised pages, please date or code each page and figure. To facilitate the Department's review, please return a copy of the Department's comments with annotations in the left margin which identify the revised pages, figures, tables, *etc.* where Fort Rucker's responses to each comment are recorded.

If you have any questions or concerns regarding this matter, please contact Mr. Colin Mitchell of the Governmental Hazardous Waste Branch at 334-271-7967 or via e-mail at [cjmitchell@adem.state.al.us](mailto:cjmitchell@adem.state.al.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Cobb". The signature is fluid and cursive, written over a white background.

Stephen A. Cobb, Chief  
Governmental Hazardous Waste Branch  
Land Division

Attachment

SAC/TPS/CJM/lac

Cc: Sheri Festoso, Alabama National Guard  
Melissa Shirley, USACE Mobile



**ADEM Comments**  
**Remedial Investigation Report Revision 1, dated December 11, 2012**  
**Mobile OMS-28**  
**Mobile, Alabama**

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- 1) **Figure 4-6 Groundwater Quality Map:** The Department does not concur with the conclusion that the groundwater contamination plume has been fully delineated. When a hazardous constituent is detected within a monitoring well, it must be assumed that the contaminant plume extends to the next well that exhibits hazardous concentrations below regulatory limits. It is inaccurate to interpolate the plume boundary between two wells. For example, MW-11, located on the northern part of the property, exhibited concentrations above MCL when it was sampled in November 2006. The TCE plume is depicted as ending slightly north of MW-11, despite the fact that there is insufficient data to draw this conclusion. The Department requests that, where applicable, the figures are corrected to show a more conservative plume delineation based solely on monitoring data.
- 2) **Figure 4-6 Groundwater Quality Map:** The groundwater contamination plume currently extends across the boundary of the OMS-28 property. The Department notes that, should an Environmental Covenant be required at OMS-28, any Land Use Controls (LUCs) will not be applicable to any property not owned by ANG. Therefore, any contamination that has migrated offsite must be remediated to meet appropriate regulatory levels. Please address.
- 3) **Section 6.1.6:** RBTLs for PCE and TCE in soil were developed using the ARBCA RM-2 model. A hypothetical well located at the nearest residential boundary was chosen as the point of exposure. The Department notes that any RBTLs calculated using these parameters are protective of an industrial use scenario. Please note that any response action that does not return a property or site to conditions suitable for unrestricted use will require an Environmental Covenant that incorporates appropriate LUCs in accordance with ADEM Admin. Code 335-5. Please address.
- 4) **Section 6.1.6:** The Department notes that RBTLs calculated using the ARBCA RM-2 model are less than respective ADEM PSVs for a residential use scenario. As stated in the August 4, 2011 emails between the Department and USACE, the Department will require that cleanup be performed to reduce contaminant concentrations to levels below any calculated RBTLs, regardless of PSVs. Please address.
- 5) **Section 7.4:** This section recommends that a Feasibility Study (FS) be developed to evaluate alternatives to address TCE contamination in groundwater resulting from soil contamination. However, the Department requires that the FS address all contamination that is determined to be above regulatory limits, not just TCE. Please submit the revised RI to the Department for approval prior to developing and submitting the FS.