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May 5, 2014

BRANDYE L. WILLIAMS
MAJ, CM
Environmental Staff Officer
ARNG-ILE-C
111 S. George Mason Drive
Arlington, VA 22204

RE: **ADEM Response:** *Feasibility Study (FS) for the Alabama Army National Guard (ALARNG) OMS-28*, dated February 7, 2014.
Mobile OMS-28, Mobile County, Alabama
DSMOA ID: 535-223-0031

Dear Major Williams:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the Alabama Army National Guard's subject document. Based on this review, the Department has provided comments in the attached document. The Department's comments should be addressed as part of the upcoming Proposed Plan.

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.

Sincerely,

A handwritten signature in black ink that reads "Stephen A. Cobb".

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

Attachment

SAC/TPS/CJM/akr

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

Birmingham Branch
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(205) 942-6168
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ATTACHMENT
Feasibility Study for the ALARNG OMS-28
ADEM Review Comments
Fort Rucker

Section 4.2.4.4 Groundwater Performance Monitoring: It is unclear whether groundwater monitoring will continue after the active remediation phase is completed. Groundwater monitoring and delineation of the contamination plume must continue as long as contamination remains above Maximum Contaminant Levels (MCLs). The Department requests that the Proposed Plan clearly state that groundwater monitoring will continue as long as contamination above MCLs exists at the site.

General Comment: It is unclear what the path forward will be if the proposed remediation alternative is unsuccessful in reducing contamination levels below MCLs within the expected timeframe. The Department requests that a contingency plan be developed that briefly outlines a path forward in the event that contamination remains in place at the completion of the remediation phase of the project.