

FINAL

COMMUNITY INVOLVEMENT PLAN

**ALABAMA ARMY NATIONAL GUARD MOBILE OMS 28 & 29
MOBILE COUNTY, ALABAMA**

DoD Contract Number: **W912PL-16-D-0042, PO 0069**

Reviewed and Approved by:

This document should be used only with the approval of the United States Army Environmental Command (USAEC) and Alabama Army National Guard Mobile OMS 28 & 29.

June 2018

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MOBILE COUNTY, ALABAMA**

Prepared Under:



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LIST OF ACRONYMS

ADEM	Alabama Department of Environmental Management
AEDB-R	Army Environmental Database – Restoration
AFB	Air Force Base
ALARNG	Alabama Army National Guard
AOC	Area of Concern
AR	Army Regulation
ARAR	Applicable, Relevant and Appropriate Requirement
Army	Department of the Army
ARNG	Army National Guard
BD	Building Demolition
CC	Compliance-related Cleanup
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIP	Community Involvement Plan
COC	Contaminant of Concern
COPC	Contaminant of Potential Concern
CRP	Compliance Restoration Program
DD	Decision Document
DERP	Defense Environmental Restoration Program
DMM	Discarded Military Munitions
DoD	Department of Defense
DR	Debris Removal
FMS	Field Maintenance Shop
FS	Feasibility Study
IRP	Installation Restoration Program
LTM	Long-Term Management
MC	Munitions Constituents
MCL	Maximum Contaminant Level
MMRP	Military Munitions Response Program
MR	Munitions Response
MRSP	Munitions Response Site Prioritization Protocol
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No Further Action
NPL	National Priorities List
OMS	Organization Maintenance Shop
PA	Preliminary Assessment
PCE	Tetrachloroethylene
POC	Point of Contact
POL	Petroleum, Oil and Lubricants
PP	Proposed Plan
RAB	Restoration Advisory Board
RA-C	Remedial Action - Construction
RA-O	Remedial Action - Operation
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design

RI	Remedial Investigation
SARA	Superfund Amendments and Reauthorization Act
SI	Site Inspection
TAPP	Technical Assistance for Public Participation
TCE	Trichloroethylene
UE	Unrestricted Exposure
USC	United States Code
USEPA	U.S. Environmental Protection Agency
UST	Underground Storage Tank
UU	Unlimited Use
UXO	Unexploded Ordnance
VOC	Volatile Organic Compound

1.0 OVERVIEW OF COMMUNITY INVOLVEMENT PLANS

The Department of the Army (Army) has prepared this Community Involvement Plan (CIP) for the Defense Environmental Restoration Program (DERP) at the Alabama Army National Guard (ALARNG) Mobile Organization Maintenance Shops (OMS) 28 & 29 in Mobile, Mobile County in Alabama. The CIP provides guidance for public involvement associated with the Compliance Restoration Program (CRP), formerly compliance-related cleanup (CC), site at ALARNG Mobile OMS 28 & 29.

The Army has prepared the ALARNG Mobile OMS 28 & 29 CIP in accordance with current U.S. Environmental Protection Agency (USEPA) guidance. The community involvement requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and the Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Act of 1984, are outlined herein.

1.1 Purpose

Effective communication, and the timely exchange of information are essential for maintaining community understanding and support for ALARNG Mobile OMS 28 & 29 cleanup activities, and to ensure the success of community involvement. Installation responsibilities, as referenced throughout this document, refer to the responsibilities of ALARNG Mobile OMS 28 & 29. The purposes of the community involvement process are to:

-) Establish effective methods for informing the community of ALARNG Mobile OMS 28 & 29 cleanup program actions;
-) Solicit input and identify concerns that the local community may have regarding current and future cleanup program activities; and
-) Maintain a strategy that supports pro-active, two-way communication between the Army and the local community.

Two-way communication and public comment activities that encourage two-way communication between ALARNG Mobile OMS 28 & 29 and the local community are identified in the CIP. It also

identifies target audiences including local citizens and neighbors; installation residents and tenants; federal, state, and local officials and agencies; and local businesses and civic interest groups.

2.0 SITE CLEANUP BACKGROUND

2.1 Site Location and Description

ALARNG Mobile OMS 28 & 29 is located in the logistics/manufacturing district of the Brookley Field Aeroplex (Formally Brookley Air Force Base [AFB]). The site occupies approximately 7.3 acres of property owned by the Alabama Armory Commission and is bordered by residential property to the north; United States Coast Guard, Mobile Station to the east; and industrial properties to the south and west. ALARNG Mobile OMS 28 & 29 is currently operated under the National Guard Bureau Headquarters. The installation's federal mission is to provide properly trained and equipped units for the prompt mobilization for war, National emergencies, or as otherwise needed. The installation's state mission is to provide trained and disciplined forces for domestic emergencies or as otherwise provided by state law. The location of ALARNG Mobile OMS 28 & 29 is shown on **Figure 1**.

2.2 History of Site Operations

ALARNG Mobile OMS 28 & 29 occupies a site that has been used for maintenance-related activities associated with the Brookley AFB since the mid-1930s. The ALARNG constructed the original maintenance buildings OMS 28 and 29 in the 1950s and 1960s respectively. In 1978, OMS #28 was built to serve as a single maintenance shop for maintenance and direct support for military police, medical, signal, communications, and field artillery units; the building was enlarged in 1994. The original maintenance buildings (OMS 28 and 29) were demolished in the early 2000s. OMS #28 was renamed Field Maintenance Shop (FMS) #28 in 2005.

2.3 Overview of the Army Cleanup Program

The DERP was formally established by Congress in 1986 and provides for the cleanup of Department of Defense (DoD) sites under the jurisdiction of the Secretary of Defense. The key objective of the cleanup program is to reduce, or eliminate when possible, threats to human health and the environment that result from historical use or disposal practices. There are three environmental restoration activities categorized under DERP: the Installation Restoration Program (IRP), the

Military Munitions Response Program (MMRP), and the Building Demolition/Debris Removal (BD/DR) program. Additionally, CC addresses cleanup requirements that are legally mandated but not eligible for funding under DERP.

The IRP is a comprehensive program to address required response actions for releases of hazardous substances and pollutants or contaminants; petroleum, oil and lubricants (POL); hazardous wastes or hazardous waste constituents; and explosive compounds released to soil, surface water, sediment, or groundwater as a result of ammunition or explosives production or manufacturing at ammunition plants. The IRP category also includes response activities to address unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC) posing an explosive, human health, or environmental hazard that are incidental to an existing IRP site. DERP guidance requires that sites in the IRP be prioritized for cleanup based primarily on relative risk by grouping sites or areas of concern (AOCs) into high, medium, and low priority categories. Relative risk is evaluated using three factors: the contaminant hazard factor (i.e., the types of contaminants present and how hazardous they are); the migration pathway factor (whether the contaminants are moving, and in what direction); and the receptor factor (potential of humans or plants/animals to be exposed to the contaminants). For further information on how relative risk is evaluated for IRP sites, refer to the *DoD Relative Risk Site Evaluation Primer* (1996). ALARNG Mobile OMS 28 & 29 does not have any areas that fall within this category.

The MMRP addresses non-operational range lands that are suspected or known to contain UXO, DMM, or MC. In the MMRP, relative cleanup priorities are assigned using the DoD Munitions Response Site Prioritization Protocol (MRSPP) (32 Code of Federal Regulations [CFR] Part 179). Data are gathered during a comprehensive site evaluation to identify munitions contaminant types, sources, transport processes, receptors, and exposure pathways. The data are evaluated to determine if a munitions response (MR) area requires further investigation, and to assign a priority for subsequent action. ALARNG Mobile OMS 28 & 29 does not have any areas that fall within this category.

BD/DR refers to the demolition and removal of unsafe buildings and structures at facilities or sites that are or were owned by, leased to, or otherwise possessed by the DoD. ALARNG Mobile OMS 28 & 29 does not have any areas that fall within this category.

The CRP manages the cleanup of former CC program sites that include remediation of contamination at Army overseas facilities; cleanup of contamination resulting from operations that have occurred since October 1986 (non-DERP) at Active Army, Army Reserve, and Army National Guard (ARNG) federally owned facilities; and cleanup at non-federally owned, federally supported ARNG facilities. CRP sites include releases from hazardous waste treatment, storage and disposal facilities or solid waste landfills undergoing RCRA closure, and releases from RCRA underground storage tanks (USTs) in service prior to 1986. Like the IRP and MMRP, CRP follows CERCLA and RCRA guidelines for cleanup and closure.

Each Army installation must implement a cleanup strategy per DERP objectives that protects human health and the environment and reduces relative risk where risk to human health and the environment has been identified.

2.3.1 Phases of Cleanup Process

The investigation and restoration of sites contaminated by past practices is conducted in steps, or phases, with provisions for emergency removal actions or other rapid responses if an imminent danger to public health is identified. The main steps, or phases, in the cleanup process are briefly described below. The names used here are specific to the CERCLA process. The equivalent phase names used in the RCRA program are provided in **Appendix A**.

Preliminary Assessment (PA) – This is the initial review and analysis of available information to determine whether a release is likely to have occurred. The PA describes the potential source and nature (type) of releases, includes a preliminary evaluation of threats to the health and welfare of the public and the environment, and recommends subsequent phases in the cleanup process. The relative risk is evaluated during this phase. The decision to close out a site may be made at the end of the PA phase if enough data exists to support that decision. The analysis is captured in a Preliminary Assessment Report which is made available to

stakeholders.

Site Inspection (SI) – This phase is conducted for AOCs that are identified during the PA, or for MR areas. The SI determines the relative cleanup priority, characterizes the presence or absence of contamination, and determines the next appropriate phase. Screening level human health and/or ecological risk assessments may be performed for MMRP sites during this phase. A decision to close out a site may be made at the end of the SI phase if enough data exists to support that decision. The data from these activities are presented in an SI Report which is made available to stakeholders.

Remedial Investigation (RI)/ Feasibility Study (FS) – The nature (types) and extent (vertical and horizontal boundaries) of the contamination, and severity of any threat to human health and environment are determined in the RI. Human health and/or ecological risk assessments are conducted during the RI phase.

Potential remedial (cleanup) alternatives are developed and evaluated during the FS phase to address any threats to human health and the environment. The remedial alternatives are evaluated based on an established set of USEPA criteria. The criteria evaluation allows the Army to identify the remedial alternative that best meets the applicable, relevant and appropriate requirements (ARARs) and mitigates threats to human health and the environment.

The **proposed plan (PP)** is a synopsis of the RI/FS that summarizes for the public what the remedial alternatives are, how they were evaluated, how they compared to one another, and which alternative the Army identified as the preferred remedy. The PP is distributed to the public and to the regulatory community for review and comment before a final remedy is selected. A summary fact sheet also is made available to the public at this point in the process. After the public and relevant regulators' review and comment on the PP, the remedy is revised as needed and documented in a Record of Decision (ROD) or a Decision Document (DD). A ROD or DD is a legal document that specifies the selected remedy, its objectives, and its endpoint. While the Army is always a signatory to a ROD for one of its installations, federal

or state regulatory signatures also may be required based on a site's National Priorities List (NPL) and/or RCRA status. Further information on this process is available in *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (USEPA, July 1999).

Remedial Design (RD) – This phase begins after the final remedy has been selected and documented in a ROD. The RD phase includes establishing information and performance objectives, obtaining design information from the military installation, and discussing the design concept with technical experts.

Remedial Action-Construction (RA-C) – The RA-C phase is the construction of and/or implemented cleanup remedy noted in the ROD and designed in the RD phase. When the RA-C phase is complete, the Army classifies the site as Remedy-in-Place (RIP).

Remedial Action-Operation (RA-O) – The RA-O phase takes place while the remedy is operating or in progress, and the performance of the remedy is monitored to measure progress toward the remediation goals.

Long-Term Management (LTM) – Post-project activities such as long-term monitoring or LTM also may be required to document the continued effectiveness of the selected remedy. At the point in the restoration process when restoration goals have been met and No Further Action (NFA) is warranted, “closeout” occurs. For any site that is not restored to a condition that allows unlimited use/unrestricted exposure (UU/UE), the protectiveness of the remedy is reviewed during the five-year review process.

2.3.2 Regulatory/Policy

The DERP is the statutory authority that establishes an environmental restoration program for the DoD. The scope of the DERP is defined in 10 United States Code (USC) § 2701(b), which states:

“Goals of the program shall include the following: (1) identification, investigation, research and development, and cleanup of contamination from a hazardous substance, or pollutant or contaminant; (2) correction of other environmental damage (such as detection and disposal of

unexploded ordnance) which creates an imminent and substantial endangerment to the public health or welfare or to the environment; (3) demolition and removal of unsafe buildings and structures, including buildings and structures of the DoD at sites formerly used by or under the jurisdiction of the Secretary.”

When Congress established the DERP, they directed that DoD cleanup efforts be consistent with the CERCLA. CERCLA requires that cleanup efforts at federal facilities be conducted in accordance with the requirements in Section 120, 42 USC § 9620 of CERCLA. Executive Order 12580 delegates authority for implementing CERCLA to various federal officials, including the DoD. In order to have a common framework for managing a national cleanup program, the Army uses CERCLA as the primary legislative authority for managing environmental cleanup.

This CIP is based on guidance for CERCLA cleanup activities, 42 USC §§ 9601 to 9675, as implemented by the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 40 CFR Part 300. No NPL sites have been identified at ALARNG Mobile OMS 28 & 29. The National Guard Bureau Headquarters serves as the lead agency for the cleanup activities at ALARNG Mobile OMS 28 & 29, with regulatory oversight and support provided by the Alabama Department of Environmental Management (ADEM).

2.4 Cleanup Program at Mobile OMS 28 & 29

The CRP was initiated at ALARNG Mobile OMS 28 & 29 in October 1994 after a petroleum-related release was observed following the removal of a 2,000-gallon gas/diesel UST in one of three former UST pits (Pit 2) in October 1992. Following ten years of groundwater monitoring, trichloroethylene (TCE) was identified during a round of groundwater sampling and ensuing investigations and cleanup activities were addressed under the Army Environmental Database – Restoration (AEDB-R) designated site identifier CCALTCE28. Contaminants of concern (COCs) at CCALTCE28 are volatile organic compounds (VOCs) influencing the groundwater and soil. Specific information on the history of contamination at CCALTCE28 is detailed in Section 3.1.

In accordance with DoD guidance (DoD Manual 4715.20, March 2012) and Army environmental regulation (AR 200-1, 2007), this installation-specific CIP is an integral requirement of the IRP and

is implemented by Army personnel. The plan serves as a guide and toolbox for IRP-related personnel and contractors, as well as for installation officials and personnel, in their efforts to inform and involve the local community. This plan is available to the public as part of the Administrative Record and Information Repository. Information Repository and Administrative Record location and contact information are provided in **Appendix B**.

3.0 ACTIVE CLEANUP SITE AT ALARNG MOBILE OMS 28 & 29

The schedule for the active CRP site is summarized in **Table 1**. Site description and cleanup/exit strategy is discussed below.

3.1 FMS 28 TCE Site (CCALTCE28)

AEDB-R designated site CCALTEC28 encompasses investigations and cleanup activities associated with former and current maintenance activities conducted at the FMS 28, formerly OMS #28. The site is located north of what was once Brookley AFB and based on historical information has been used as a vehicle and equipment maintenance facility since the 1950s. The COCs at CCALTCE28 are VOCs in soil and groundwater.

Four petroleum USTs were removed from three pits at the site in 1992. A release was observed in Pit 2 following the removal of a 2,000-gallon UST. Subsequent investigations identified a groundwater plume, which was delineated in 1994. After 10 years of quarterly groundwater monitoring, sampling results from groundwater collected from wells outside of the site-specific monitoring well network showed that the petroleum plume had migrated beyond the site. Additional monitoring wells were installed in 2005 to further delineate the plume. Groundwater samples collected from one of the newly installed monitoring wells identified the presence of TCE and tetrachloroethylene (PCE). Subsequently, an additional downgradient groundwater monitoring well was installed and samples were collected as part of a Secondary Investigation. Petroleum-related contaminants of potential concern (COPCs) and lead were not detected in the groundwater samples collected at concentrations above the ADEM Initial Screening Levels; however, TCE was detected above maximum contaminant levels (MCLs) for drinking water quality. The occurrence of TCE is not related to the initial diesel/gasoline fuel tank investigation and is believed to be the result of a localized solvent spill. The presence of TCE at the site prompted additional investigations to determine the level of VOC


contamination present at the site, and petroleum-related COCPs and lead were no longer considered a risk.

Soil samples were collected between April 2006 and March 2007, to delineate the vertical and horizontal extent of contamination on the ALARNG property. In 2006, seven additional groundwater monitoring wells were installed on off-post property to determine the contaminant plume boundary. Additional groundwater monitoring wells were installed and sampled per ADEM recommendations to delineate the vertical and horizontal extent of groundwater contamination, and to obtain soil samples between the upper and deeper saturation zones. Groundwater samples were collected during well installation in July 2008, and quarterly sampling was performed from December 2008 to May 2009. ADEM approved recommendations to conduct remaining sampling events as needed; additional groundwater samples were collected in September and December of 2009, and March and September in 2010 and 2011. Supplemental Comprehensive Investigation Reports were completed for all sampling events. A RI Report was submitted to state regulators for review in August 2013, followed by an FS for OMS# 28 in February 2014.

The cleanup plan for CCALTEC28 is in preparation, public comment on, and approval of the PP and DD followed by Remedial Actions (RAs) as outlined in the DD. Site closeout will occur through the phases described in Section 2.3.1.

Table 1. ALARNG Mobile OMS 28 & 29 Active CRP Site and Schedule

Site ID	Site Name	Phase	FY18	FY19	FY20	FY21	FY22+
CCALTCE28	FMS 28 TCE Site	RI/FS					
		RD					
		RA(C)					
		RA(O)					

 - phase underway

4.0 COMMUNITY PROFILE

The following subsections present an overview of the surrounding community and a general chronology of community participation and communications to date, as well as the results of the community interviews conducted for this CIP.

4.1 Mobile County

ALARNG Mobile OMS 28 & 29 is located in the City of Mobile which is located in Mobile County.

Census data from 2010 for Mobile County showed the following:

) 412,999 people) 178,199 housing units
) 48% male	
) 52% female	

Mobile County Population by Race:

) 60.2% Caucasian) 0.9% American Indian/Alaska Native
) 34.6% African American) 1.8% Asian
) 2.5% Other	

Mobile County Population by Age:

) 13.6% - 0 to 9 years) 26.7% - 45 to 64 years
) 28.3% - 10 to 29 years) 12.6% - 65+ years
) 18.8% - 30 to 44 years	

4.1.1 The City of Mobile

Census data from 2010 for the City of Mobile showed the following:

) 195,121 people) 89,131 housing units
) 47.0% male	
) 53.0% female	

The City of Mobile Population by Race:

) 45.0% Caucasian) 0.3% American Indian/Alaska Native
) 50.6% African American) 1.8% Asian
) 2.3% Other	

The City of Mobile Population by Age:

) 13.1% - 0 to 9 years) 25.6% - 45 to 64 years
) 22.3% - 10 to 29 years) 21.2% - 65+ years
) 17.8% - 30 to 44 years	

4.2 History of Community Involvement

At present, a Restoration Advisory Board (RAB) has not been established for environmental restoration work at ALARNG Mobile OMS 28 & 29. A RAB is a partnership between the surrounding community, the installation, the State, and the USEPA that provides a forum for discussions to increase community understanding and support for cleanup efforts. It helps with improving the soundness of government decisions and ensuring cleanups are responsive to community needs. As indicated in the Office of the Secretary of Defense Restoration Advisory Board Handbook (March 2007), “the Installation Commander will review community interest to establish a RAB at least every 24 months.” The installation is in the process of determining interest in establishing a RAB and community interest was most recently solicited on March 11 and 16, 2018 in the Mobile Press-Register.

The Installation has also participated in additional public involvement activities, such as public comment periods, mailing lists, and maintenance of an information repository and administrative record. These activities are discussed in Section 5.0.

4.3 Community Feedback

This section describes the methodology that ALARNG Mobile OMS 28 & 29 used to collect community input during the CIP process. This section also summarizes the communication preferences and concerns of the interviewees.

4.3.1 Interview Participants

To prepare this CIP, the Army conducted in-person community interviews during March and April 2018 with people who work and/or live near ALARNG Mobile OMS 28 & 29. Interviewees included general community members and residents who live in close proximity to the installation, local government officials, local business owners, and business persons. One interviewee responded by email.

4.3.2 Issue Identification Approach and Findings

The primary purpose of collecting input from the community is to identify issues and concerns so that the Army can address them via community involvement efforts. To obtain this information, a total of 24 people from nearby businesses and communities were interviewed regarding the issues and concerns associated with the installation’s cleanup progress. The comments and insights from members of the community provided information to help design the ALARNG Mobile OMS 28 & 29 community involvement program. These findings are representative only of the individuals who participated in the community interviews and should not be construed as directly representative of the larger population. The interview questions and responses are provided in **Table 2**.

Table 2. Community Interview Responses

Question	Response
1.) How long have you lived in this community?	Less than 5 years = 7 5 to 10 years = 4 10 to 20 years =2 20+ years = 11

Question	Response
2.) What is your occupation?	Answers included the following: elected official (2), sales clerk, restaurant manager, manicurist, hotel housekeeper, Director of Business Development, counter salesman-industrial supply, Manager of Mobile Parks and Recreation, bank manager, executive assistant, funeral home director, ship and barge inspector, homemaker, school admissions Director, business owner (2), dental office manager, receptionist, bookkeeper, education department shop manager, office assistant, warehouse/shipping supervisor, and Human Resources Manager.
3.) How would you characterize the relationship between ALARNG Mobile OMS 28 & 29 and the surrounding communities?	Good = 18 Not Sure = 6
4.) a) What do you know about the Army's cleanup and environmental restoration activities at ALARNG Mobile OMS 28 & 29? b) Are you interested in learning more about the environmental restoration and cleanup activities at ALARNG Mobile OMS 28 & 29?	a) Nothing = 21 Somewhat Familiar = 3 b) Yes = 10 No = 14

Question	Response
<p>5.) a) How would you prefer to get information regarding the cleanup and environmental restoration activities at ALARNG Mobile OMS 28 & 29?</p> <p>b) What is the best way to distribute information about the cleanup and environmental restoration activities to the community? Feel free to name specific social media and news outlets.</p>	<p>a) Web search = 8 Mailed flier/newsletter = 7 Email = 6 Local TV News = 3 Social media = 3 Online Newspapers = 2 Direct Phone Call = 1 No Preference = 1</p> <p>(Note: Some interviewees indicated multiple answers)</p> <p>b) Fliers = 7 Website = 6 Social media = 4 Email = 5 TV = 3 Local newspapers (print and online) = 2</p> <p>(Note: Some interviewees indicated multiple answers)</p>
<p>6.) a) If you had questions about the Army's cleanup and environmental restoration activities, do you know who/where to go for assistance?</p> <p>b) What channels/venues do you prefer to use when you have questions/concerns (for example: email, direct phone call, website comment submission, etc.)?</p>	<p>a) Yes = 9 No = 15</p> <p>b) Direct Phone Call = 8 Email = 8 Face-to-face = 4 Website = 2 None = 2 City Council = 1</p> <p>(Note: One interviewee provided multiple answers for 6b)</p>
<p>7.) a) Are you aware ALARNG Mobile OMS 28 & 29 has a public Information Repository containing documents pertaining to the investigation and restoration efforts at ALARNG Mobile OMS 28 & 29?</p>	<p>a) Yes = 5 No = 19</p>

Question	Response
<p>8.) Some installation restoration programs that have sufficient interest in the cleanup and environmental restoration activities have a formal Restoration Advisory Board (RAB) that serves as a forum for two-way communication between the installation, the community and other stakeholders, such as the state and local Tribes, regarding the investigation and restoration. Is this something that interests you?</p>	<p>Yes = 6 No = 16 Maybe = 2</p>
<p>9.) Do you have any suggestions for how the Army could more effectively communicate regarding its cleanup and environmental restoration activities in Mobile County?</p>	<p>No suggestions = 10 Local TV News = 5 Mailings/Fliers = 5 Website = 4 Community meetings = 3 Newspaper articles = 3 Social media = 3 Local Radio = 1</p> <p>(Note: Several interviewees indicated multiple answers)</p>
<p>10.) Who in the community do you trust most to provide information about the restoration activities at ALARNG Mobile OMS 28 & 29?</p>	<p>City officials/council/legislators = 6 Directly from the Army (ALARNG) = 5 TV (Fox 10, CBS 5) = 4 ADEM = 2 Not sure = 3 U.S. Army Corps of Engineers = 1 Mobile Chamber of Commerce = 1 Neighbor = 1 Mobile Bay Watch Environmental Group = 1</p>
<p>11.) Do you trust the Army's handling of the ALARNG Mobile OMS 28 & 29 restoration?</p>	<p>Yes = 18 No = 2 Not Sure = 4</p>
<p>12.) Are you familiar with your neighbor's/other community members' thoughts regarding the restoration?</p>	<p>Yes = 1 No = 23</p>

Question	Response
13.) What would be the best location for ALARNG Mobile OMS 28 & 29 to hold any public meetings related to environmental restoration?	ALARNG Auditorium = 5 Palmer Pillans Middle School = 4 Government Plaza = 2 Gillard Elementary School = 2 Local church (not specific) = 2 Mobile Main Library = 2 Aviation College or Mobile Airport Authority (Brookley Aeroplex) = 2 Maryvale Elementary = 1 Mobile Coliseum = 1 Fort Whiting Armory Reception Hall = 1 Mobile Civic Center = 1 Elks Lodge = 1 Community Center (not specific) = 1 Not Sure = 2 (Note: Some interviewees indicated multiple answers)

4.4 Responses to Concerns

Based on the results of the interview process, the surrounding community is generally unaware of the ALARNG restoration program and its process. The majority of interviewees were also unaware of the information available to them or how to obtain that information (such as the Information Repository). Three respondents stated they were somewhat familiar with ongoing cleanup and environmental restoration activities. One respondent worked at a facility near ALARNG Mobile OMS 28 & 29 and know personnel there. Another respondent was an elderly clerk at a dry-cleaners and lived in the area all her life, and was aware of environmental restoration. The third interviewee was manager of a popular restaurant near ALARNG Mobile OMS 28 & 29 and knew persons who worked at the facility. Three of the interviewees stated they were familiar with the Information Repository, but only because they are aware the government usually keeps records and would expect the same for the military. Ten respondents surveyed stated they were interested in learning more about environmental restoration and cleanup activities at ALARNG Mobile OMS 28 & 29; 14 interviewees stated they were not interested. All but one respondent stated they were not familiar with neighbor's or other community members' thoughts regarding ALARNG Mobile OMS 28 & 29 restoration. This respondent was a homemaker and had been in the area all their life, and remembered when Brookley Aeroplex was an Air Force Base. The respondent was aware of the

environmental impact in the area, but did not elaborate on what they had heard with regards to other community members or neighbor's concerns.

Sixteen interviewees stated they would not be interested in participating in a RAB at ALARNG Mobile OMS 28 & 29: six interviewees stated they were interested and two stated they were somewhat interested.

When asked about potential locations to hold public meetings, the five interviewees who worked at the Brookley Aeroplex suggested holding it at the ALARNG facility. Seven interviewees suggested one of three local schools (one middle and two elementary) as possible venues. Two respondents named the Government Plaza building where the City Council and Mayor's offices are located as a venue and two respondents suggested locations within the Brookley Aeroplex. Six venue locations received one mention each and two interviewees had no suggestion. Suggested meeting locations are provided in **Appendix D**.

Most respondents characterized the relationship between the Army and the surrounding community as good, though they said they knew very little about ongoing environmental restoration at ALARNG Mobile OMS 28 & 29. Six of the interviewees who stated they were not sure about the relationship between the Army and the surrounding communities stated they were not aware the installation was present in the area.

Respondents suggested that they trusted receiving information about restoration activities directly from ALARNG Mobile OMS 28 & 29 or from local government (city officials, city council, or legislators) the most. Four interviewees named local television stations, FOX 10 or WKRG 5 (CBS), as trusted sources for news and information. One interviewee stated she would trust whomever was not a politician.

Most respondents stated they trusted the Army's handling of ALARNG Mobile OMS 28 & 29 environmental restoration. Four of the respondents who said they were not sure whether they trust the Army said that it was hard to know because they have no knowledge of the installation facility or ongoing environmental restoration activities.

4.5 Summary of Communication Needs

Searching for information on the internet was the preferred way for respondents to receive updates on cleanup and restoration activities, followed by mailed newsletters/fliers; email; social media; and local television news. Interviewees thought fliers or an ALARNG website would be the best ways to distribute information about the cleanup and environmental restoration activities to the community. Respondents also felt information could be distributed through social media, email, TV, and local newspapers (in print and online).

When asked about how the Army could more effectively communicate regarding its cleanup and environmental restoration activities in Mobile County, respondents listed running television interviews or stories, distributing mailings and fliers, and making information available on the internet through a website as popular suggestions. Additional suggestions included holding community meetings, posting articles in the newspaper, and using social media to share information. Two respondents stated that utilizing TV news media and online newspapers would reach a wider set of the population. Nine participants mentioned that they did not have any suggestions as they were unaware of the installation or did not feel ongoing activities impacted them. Specific media sources mentioned by community members are provided in **Appendix C**.

A majority of participants did not know how to contact ALARNG Mobile OMS 28 & 29 for questions or assistance about cleanup and environmental restoration activities and preferred to use a direct phone call or email to submit any questions or concerns. Other preferred methods included person-to-person and website submission. Four of the respondents stated they would prefer person-to-person interaction with ALARNG Mobile OMS 28 & 29 so that they would be able to ask for information directly.

5.0 COMMUNITY INVOLVEMENT ACTIVITIES

The community involvement activities presented in this section are based on regulatory guidance outlined in the USEPA's *Superfund Community Involvement Handbook* (USEPA, 2016) and the *RCRA Public Participation Manual* (USEPA, 2017). The activities are presented below in the order of those required to occur at particular milestones throughout the program followed by those that are appropriate for the program based on community interest or project circumstances.

5.1 Points of Contact (POCs)

For questions related to the environmental cleanup actions at ALARNG Mobile OMS 28 & 29, community members should contact the following:

ARNG Directorate
Arlington, Virginia
703-607-7955

Additional contact information including media, citizens groups, and regulatory and federal, state and local elected officials are provided in **Appendix C**.

5.2 Information Repository/Administrative Record

An electronic Information Repository is available at the Army National Guard Installations & Environment - Cleanup Branch. A public Information Repository is required under CERCLA to provide interested parties with background and technical information about the environmental cleanup program at ALARNG Mobile OMS 28 & 29. The Information Repository includes work plans, technical reports, summary documents, and other information of public interest (e.g., fact sheets and news releases). Written information materials that are intended to help increase the level of awareness in the community and provide factual information on the process of the environmental restoration program, such as public notices, newsletters, fliers, and fact sheets, will be provided as needed and will be available in the Information Repository. Examples of items currently contained in the Information Repository include:

-) The Installation Action Plan;
-) Facility Assessments;
-) Facility Investigation Reports;
-) Cleanup Work Plans and Reports;
-) Site Closure Documentation;
-) Correspondence with the regulatory community; and
-) Collections of press releases, community notices, public meeting minutes, and fact sheets.

The Administrative Record for ALARNG Mobile OMS 28 & 29 is available at the U.S. Army Corps of Engineers, Mobile District and online at <http://mobileoms28.net/>. For sites undergoing CERCLA investigations, the NCP requires that an Administrative Record be established at or near the facility under investigation. The Administrative Record includes information that may form the basis for selecting a response or remedial action. It includes all documents leading to the selection of any response action at the installation and contains documents similar to those located in the Information Repository.

The addresses for the locations of the Information Repository and Administrative Record are presented in **Appendix B**.

5.3 Public Notices, Meetings, and Comment Periods

The installation will comply with the requirements for public notification, the review of PPs and public comment periods. Public notices will be placed in local newspapers to serve as official notification to the local community of plans for environmental activities, upcoming public involvement opportunities, and the availability of documents at the Information Repository.

Public meetings, both informal and formal, are intended to inform the community about ongoing site activities and to discuss and receive feedback from the public on proposed courses of action. All meetings will be announced through public notices, news releases, direct mailings, or a combination of the three. Meetings will be held at a location that is easily accessible to the general public. Suggested meeting locations are provided in **Appendix D**.

Public comment periods will be held at specific phases or milestones in the cleanup process depending on the regulation that is guiding the cleanup at a particular site. A public comment period lasts for at least 30 calendar days under CERCLA guidance, allowing time for review and comment on the proposed action. A public meeting may be held during the public comment period; comments made at public meetings and during the public comment period will be responded to through a responsiveness summary.

5.4 Responsiveness Summaries

A responsiveness summary will be prepared and issued to address comments received from the public. At the conclusion of public comment periods, the Army will prepare, or support the state regulator in preparing, a responsiveness summary or minutes that summarize and respond to the comments received during the public comment period, including those comments given at the public meeting. The responsiveness summary is issued as part of the document under comment and made available in the Information Repository listed in **Appendix B**.

5.5 Mailing List

Mailing lists are an important component of effective community outreach which ensure that interested community members, as well as other stakeholders and communities impacted by or interested in response activities, are kept informed of activities and opportunities for community involvement. A mailing list can be used to distribute news releases, fact sheets, and other types of pertinent information for project activities.

A mailing list identifies persons and organizations potentially interested in the environmental restoration activities. This list may include land owners, regulators, local officials, and other persons and organizations interested in receiving written information and materials. This list is dynamic and names may be added throughout the cleanup process. Interested individuals will be added the mailing list by the Army upon request and the mailing list will be updated as necessary and appropriate. Contacts included in Appendix C are examples of potentially interested parties that may be included in a mailing list. The installation will provide information during all community participation activities as to how individuals and groups can be added to a mailing list.

5.6 Speaker Bureaus/Open House

As program milestones are achieved, project representatives notify and meet with stakeholders (including regulatory agency representatives and the public, as needed) to discuss project status and field questions about proposed restoration actions. Additionally, speakers from the installation may be available upon request to meet with and discuss restoration program activities with civic and/or environmental organizations. Interested organizations should contact the POC listed in Section 5.1.

5.7 CIP Updates

The CIP will be updated at least every five years or earlier if there are significant program changes. This CIP is a working document to guide the project staff. All or part of this plan may require revision due to new information or changes in community concerns and needs. The plan will be re-evaluated at these times to ensure that the schedule of community participation activities is appropriate.

5.8 Activity Schedule

The public will be notified of any PPs, public meetings and comment periods. Exact dates of the cleanup activities are not provided as the exact date that each phase in the Army cleanup process will be completed is not known, and the relative risk or cleanup priority and funding available for cleanup of the site will vary depending on the phase of the cleanup process.

5.9 Community Grant Opportunities

The Technical Assistance for Public Participation (TAPP) is funding available to community members of an established RAB who need technical assistance in interpreting scientific or engineering issues connected with proposed cleanup activities. If there is no established RAB, TAPP funding is not available to the community. Community members of an established RAB who are interested in applying for TAPP must contact the POC identified in Section 5.1 to confirm eligibility and request Army funding.

6.0 REFERENCES

DoD Manual 4715.20, *Defense Environmental Restoration Program Management*, March 2012.

DoD *Relative Risk Site Evaluation Primer*, 1996.

Office of the Secretary of Defense, *Restoration Advisory Board Handbook*, February 2007.

U.S. Army, Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, 2007.

U.S. Army, Army Regulation (AR) 360-1, *The Army Public Affairs Program*, October 15, 2000.

USAEC, *Alabama Army National Guard (ALARNG) Historical Research Study Report, Organizational Maintenance Shop (OMS) #28, August 2015.*

USAEC, *Pre-Draft Mobile Operations Maintenance Shops (OMS) 28 & 29 Installation Action Plan*, FY2017.

USAEC, *Mobile Operations Maintenance Shops (OMS) 28 & 29 Installation Action Plan*, October 16, 2014.

USAEC, *Restoration Advisory Board and Technical Assistance for Public Participation Guidance*, 2005.

USEPA, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, July 1999.

USEPA, *National Oil and Hazardous Substances Pollution Contingency Plan (The NCP)*, January 1992.

USEPA, *Resource Conservation and Recovery Act (RCRA) Public Participation Manual*, 2017.

USEPA, *Superfund Community Involvement Handbook*, January 2016.

USEPA, Official Website Home Page at <http://www.epa.gov>

Mobile County at www.mobilecountyal.gov/

Mobile OMS 28 & 29 Electronic Information Repository at <http://mobileoms28.net/>

Mobile Chamber of Commerce at <http://mobilechamber.com>

The City of Mobile at www.cityofmobile.org/

U.S. Census Bureau, American Fact Finder at <http://factfinder.census.gov>

FIGURE

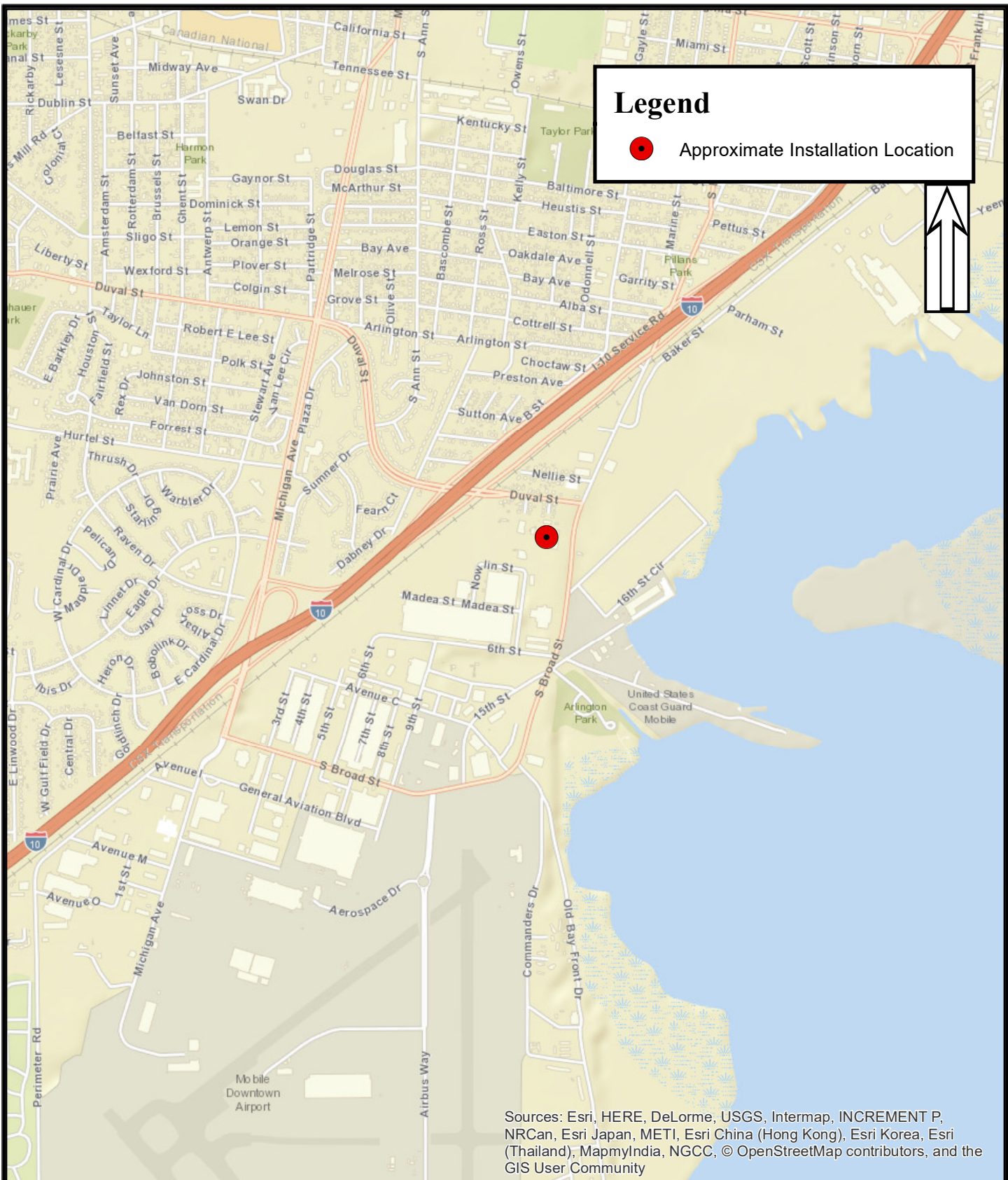
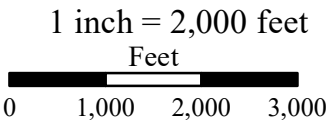


FIGURE 1. INSTALLATION LOCATION MAP



COMMUNITY INVOLVEMENT PLAN
 ALABAMA ARMY NATIONAL GUARD
 MOBILE OMS 28&29
 MOBILE COUNTY, ALABAMA



APPENDIX A

CERCLA/RCRA Equivalents

CERCLA	RCRA
Preliminary Assessment (PA)	RCRA Facility Assessment (RFA)
Site Inspection (SI)	Confirmation Sampling (CS)
Remedial Investigation/Feasibility Study (RI/FS)	RCRA Facility Investigation/Corrective Measures Study (RFI/CMS)
Proposed Plan (PP)/ Record of Decision (ROD)	Statement of Basis
Remedial Design (RD)	Design (DES)
Remedial Action (Construction) (RA-C)	Corrective Measures Implementation (Construction) (CMI-C)
Remedial Action (Operation) (RA-O)	Corrective Measures Implementation (Operation) (CMI-O)
Long-term Management (LTM)	Long-term Management (LTM)
Interim Remedial Action (IRA)	Interim Measure (IM)

CERCLA	RCRA UNDERGROUND STORAGE TANK (UST) TERMS
Preliminary Assessment (PA)	Initial Site Characterization (ISC)
Remedial Investigation (RI)	Investigation (INV)
Feasibility Study (FS)	Corrective Action Plan (CAP)
Remedial Design (RD)	Design (DES)
Remedial Action (Construction) (RA-C)	Implementation (Construction) (IMP-C)
Remedial Action (Operation) (RA-O)	Implementation (Operations) (IMP-O)
Long-term Management (LTM)	Long-term Management (LTM)
Interim Remedial Action (IRA)	Interim Remedial Action (IRA)

APPENDIX B

Information Repository and Administrative Record Locations

Information Repository:

Army National Guard
Installations & Environment – Cleanup Branch
111 South George Mason Drive
Arlington, Virginia 22204

Administrative Record:

U.S. Army Corps of Engineers, Mobile District
CESAM-EN-GE
109 St. Joseph Street
Mobile, AL 36602
251-690-2616

P.O. Box 2288
Mobile, Alabama 36628

and

<http://www.mobileoms28.net/>

APPENDIX C

Additional Contact Information

Media Contacts:

Newspapers

-) Mobile Press-Register
18 South Royal Street
Mobile, Alabama 36602
251-219-5400
www.alabamamediagroup.com

Radio

-) 95KSI
555 Broadcast Drive, 3rd Floor
Mobile, Alabama 36606
251-450-0100

Television

-) FOX10
1501 Satchel Page Drive
Mobile, Alabama 36606
251-434-1010
<http://www.fox10tv.com>
-) WKRG News 5 (CBS)
555 Broadcast Drive
Mobile, Alabama 36606
251-479-5555
<http://www.wkrg.com>

Social Media/Others

-) Facebook
www.facebook.com/cityofmobile/
-) Twitter
https://twitter.com/City_of_Mobile
-) YouTube, City of Mobile, Alabama
www.youtube.com

Environmental and Active Citizens Groups:

) Mobile Chamber of Commerce
451 Government St.
Mobile, Alabama 36602
251-433-6951
<http://mobilechamber.com>

) Mobile Bay Audubon Society
P.O. Box 483
Fairhope, Alabama 36533
www.mobilebayaudubon.org

) Mobile Baykeeper
450C Government Street
Mobile, Alabama 36602
251-433-4BAY
info@mobilebaykeeper.org

Regulatory Contacts:

) U.S. Environmental Protection Agency Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, Southwest
Atlanta, Georgia 30303
404-562-9900
1-800-241-1754
www.epa.gov/

) Alabama Department of Environmental Management
Colin Mitchell
1400 Coliseum Blvd.
Montgomery, Alabama 36130
334-271-7967
www.adem.state.al.us/

) Alabama Department of Natural Resources
Chief Enforcement Officer
Mobile County, Alabama
251-476-1256

Federal Elected Officials:

-) Senator Richard Shelby (R-AL)
 - Washington, DC Office
304 Russell Senate Office Building
Washington, DC 20510
202-224-5744

 - Mobile Office
113 St Joseph Street
445 U.S. Federal Courthouse
Mobile, Alabama 36602
415-393-0707

-) Senator Doug Jones (D-AL)
 - Washington, DC Office
326 Russell Senate Office Building
Washington, DC 20510
202-224-4124

 - Mobile Office
41 West I-65 Service Road, North, Ste. 2300-A
Mobile, Alabama 36608
251-414-3083

-) Representative Bradley Byrne (R-AL, District 1)
 - Washington, DC Office
119 Cannon House Office Building
Washington, DC 20515
202-225-4931

 - Mobile District Office
11 N Water Street
Ste. 15290
Mobile, Alabama 36602
251-690-2811

State Elected Officials:

) Governor Kay Ivey
c/o State Capitol
600 Dexter Avenue
Montgomery, Alabama 36130
334-242-7100

Alabama State Senate

11 South Union Street
Montgomery, Alabama 36130
334-242-7800

) Senator Vivian Davis Figures (D, District 33)
Suite 736
334-242-7871

) Senator Rusty Glover (R, District 34)
Suite 721
334-242-7886

) Senator Bill Hightower (R, District 35)
Suite 733
334-242-7882

Alabama House of Representatives

11 South Union Street
Montgomery, Alabama 36130
334-242-7600

) Representative Adline Clark (D, District 97)
Suite 540-B
334-242-7449

) Representative Napoleon Bracy (D, District 98)
Suite 540-A
334-242-7756

) Representative James E. Buskey (D, District 99)
Suite 540-C
334-242-7757

) Representative Victor Gaston (R, District 100)
Suite 519-E
334-242-7663

- J Representative Chris Pringle (R, District 101)
Suite 417-E
334-242-7589
- J Representative Jack W. Williams (R, District 102)
Suite 524-F
334-242-7694
- J Representative Barbara Drummond (D, District 103)
Suite 536-C
334-242-7764
- J Representative Marge Wilcox (R, District 104)
Suite 524-E
334-242-7546
- J Representative David Sessions (R, District 105)
Suite 417-I
334-242-0947

Local Elected Officials:

Mobile County

- J County Commissioner Merceria L. Ludgood (District 1)
205 Government Street
Mobile, Alabama 36633
251-574-1000
www.mobilecountyal.gov/government
district1web@mobile-county.net

Mayors/City Council

Mobile

- J Mayor Sandy Stimpson
Government Plaza
205 Government Street
Mobile, Alabama 36633-1827
251-208-7395
sandy.stimpson@mobile.al.gov
www.cityofmobile.org/cityofficials/mayor.php

Mobile City Council
P.O. Box 1827
9th Floor, South Tower
Government Plaza
Mobile, Alabama 36633-1827
251-208-7441
www.cityofmobile.org/citycouncil

- Vice Mayor Levon C. Manzie (District 2)
[council2@cityofmobile.org/](mailto:council2@cityofmobile.org)
- Councilmember Fredrick D. Richardson, Jr. (District 1)
[council1@cityofmobile.org/](mailto:council1@cityofmobile.org)
- Councilmember C.J. Small (District 3)
[council3@cityofmobile.org/](mailto:council3@cityofmobile.org)
- Councilmember John C. Williams (District 4)
[council4@cityofmobile.org/](mailto:council4@cityofmobile.org)
- Councilmember Joel Daves (District 5)
[council5@cityofmobile.org/](mailto:council5@cityofmobile.org)
- Councilmember Bess Rich (District 6)
[council6@cityofmobile.org/](mailto:council6@cityofmobile.org)
- Councilmember Gina Gregory (District 7)
[council7@cityofmobile.org/](mailto:council7@cityofmobile.org)

APPENDIX D

Meeting Locations

Meeting Locations:

Note: Locations were recommended by three or more interviewees

Alabama Army National Guard
620 S Broad Street
Mobile, Alabama 36615
251-379-6723

Palmer Pillans Middle School
2501 Military Road
Mobile, Alabama 36605
251-221-2300