



## NATIONAL GUARD BUREAU

111 SOUTH GEORGE MASON DRIVE  
ARLINGTON VA 22204-1373

September 10, 2020

Mr. Colin Mitchell  
Alabama Department of Environmental Management  
1400 Coliseum Boulevard  
Montgomery, AL 36130-1463

Dear Mr. Mitchell,

Investigation of the Organizational Maintenance Shop #28 located in Mobile, Alabama, has shown the Army National Guard is not responsible for a tetrachloroethylene (PCE) release located on neighboring property not owned by the Alabama Army National Guard. Please reference the Supplemental Data Gap Investigation and Groundwater Monitoring Report for the Alabama Army National Guard Organizational Maintenance Shop #28, dated January 2019, as approved by your office on January 21, 2020.

Data presented in the Supplemental Data Gap Investigation and Groundwater Monitoring Report clearly documents a release of PCE into surface soil on a privately owned undeveloped parcel (annotated as R022911360003106 on the enclosed Facility Site Location Map) northwest of Alabama Army National Guard property. This PCE release is centered approximately 200 feet from the Alabama Army National Guard property line and is within 60 feet of active railroad tracks running parallel to Interstate 10 (I-10). The ruins of a small shack located on this undeveloped parcel were found near the sample location having the highest concentration of PCE in the surface and subsurface soil and in the upper, middle, and lower surficial groundwater.

Alabama Army National Guard has had no known historical activities on the privately owned undeveloped parcel. Additionally, a commercially owned undeveloped parcel (annotated as R022911360008001001 on the enclosed Facility Site Location Map) adjacent to Organizational Maintenance Shop #28 separates it from the undeveloped parcel where the PCE release occurred, making Alabama Army National Guard involvement in the PCE release even more unlikely.

The PCE released to surface soil has percolated into subsurface soil and created a PCE plume in groundwater. The data shows this PCE plume is partially degrading into trichloroethene (TCE) and is creating a coexistent TCE plume in upper surficial groundwater centered around the PCE release. This TCE plume in the upper surficial groundwater is separate from the TCE plume in the upper surficial groundwater located on Alabama Army National Guard property resulting from a TCE release in the gravel-covered vehicle parking area used by Alabama Army National Guard. However, the

TCE plume emanating from the PCE release has migrated into the middle surficial groundwater, where it is commingling with the TCE plume emanating from Alabama Army National Guard property.

As described in the Risk Assessment Report for the Alabama Army National Guard Organizational Maintenance Shop #28, dated March 2019, there is no current risk or hazard identified from exposure to soil or groundwater on the Organizational Maintenance Shop #28 property, but the site is not protective of the human health of future receptors exposed to soil or groundwater under reasonably anticipated future land use of the Organizational Maintenance Shop #28 property. Therefore, the Alabama Army National Guard will pursue remedial action at Organizational Maintenance Shop #28.

As a result of the investigation and risk assessment and the determination that Alabama Army National Guard is not responsible for the PCE release, the Feasibility Study for the Organizational Maintenance Shop #28, dated February 2014, and approved by your office on May 5, 2014, will be revised to remove remediation of the PCE contamination in soil and groundwater and will only address remedial alternatives and goals for the risks and hazards caused by chemicals of concern attributable to the Alabama Army National Guard. The revised Feasibility Study will document the reason for the revision and the absence of PCE from consideration for remedial action. A schedule for submittal of the Feasibility Study will be provided to your office once a contractor has been obtained to prepare the revised Feasibility Study and subsequent Proposed Plan and Decision Document.

For more information, the administrative record for this site can be found online at the following location: [www.mobileoms28.net](http://www.mobileoms28.net).

If you have any questions or require assistance, please contact Ms. Karen Pinson at (256) 847-4592, [karen.b.pinson.ctr@mail.mil](mailto:karen.b.pinson.ctr@mail.mil) or Ms. Queenie Mungin-Davis at [queenie.m.mungin-davis.civ@mail.mil](mailto:queenie.m.mungin-davis.civ@mail.mil).

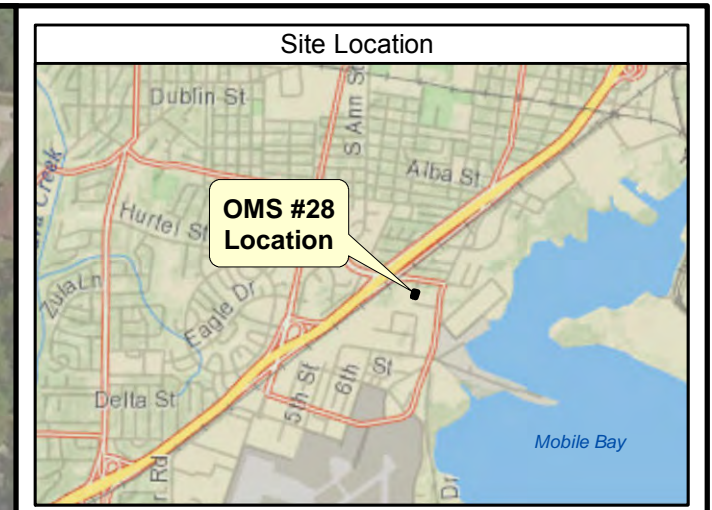
Sincerely,

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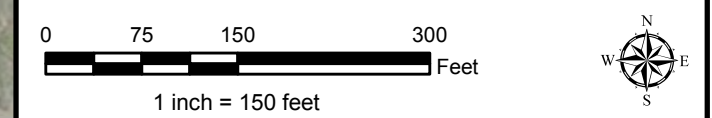
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Queenie M. Mungin-Davis, PG  
Program Manager, Cleanup Branch  
Army National Guard

Enclosure



- Legend**
- +— Railroad
  - - - - - Approximate Ditch Orientation
  - Approximate Ditch Orientation Flow Direction
  - × - - - - Fenceline
  - Parcel Boundary



**AECOM**

10 Patewood Drive, Building 6, Suite 500  
 Greenville, SC 29615  
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**Facility Site Location Map**

Army National Guard OMS #28  
 Mobile, Alabama

PROJECT NO. 60439687	DRAWN BY: TEG	DATE: 8/27/2018
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