

1400 Coliseum Blvd. 36110-2400 • Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 • FAX (334) 271-7950

January 20, 2022

ELECTRONICALLY TRANSMITTED

Queenie Mungin-Davis, PG
Program Manager, Cleanup Branch
Army National Guard, G9
Installations & Environment – Cleanup Branch
111 S. George Mason Drive
Arlington, VA 22204

Re: ADEM Review and Evaluations: Responses to Comments on the Risk Assessment Report for Organizational Maintenance Shop 28 (OMS 28), dated November 10, 2021
Mobile OMS 28, Mobile County, AL
DSMOA ID: 535-223-0031

Dear Ms. Mungin-Davis:

The Alabama Department of Environmental Management (ADEM or the Department) has completed the review of the Alabama Army National Guard's (ALARNG's) subject document and determined that it is incomplete and additional information and/or data is required.

Evaluations regarding ALARNG's subject document are provided in the attached document. Please note that if a previous comment-response evaluation is not included in the attachment, then the comment is resolved. A revised Risk Assessment Report addressing all comments should be submitted within 45 days of receipt of this letter. Responses may be submitted in the form of a revised document or appropriate revised pages and figures to be inserted in the original submission. If ALARNG chooses to submit revised pages, please date and code each page. For example, **25(r-1/20/22)** would be page 25 revised January 20, 2022.



Ms. Queenie Mungin-Davis

January 20, 2022

Page 2 of 3

If questions should arise concerning this matter, please contact Mr. Colin Mitchell of the Governmental Hazardous Waste Branch at 334-271-7967 or via e-mail at cjmitchell@adem.alabama.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Wilson".

Jason Wilson, Chief
Governmental Hazardous Waste Branch
Land Division

JJW/ATM/CJM/ap

Attachment

cc/via email: Melissa Shirley, USACE
Brad Curvin, ALARNG
Steve Holt, AECOM
Vasi Kourlas, AECOM
Tim Renn, AECOM
Lee Thomas, ADEM

ATTACHMENT
ADEM Evaluations
Responses to Comments on the Risk
Assessment Report for OMS 28
Mobile, Alabama

SLERA Comment 2: ALARNG's response to this comment states:

"The risk assessment will also make clear that the risk due to perchloroethylene (PCE) is not the responsibility of the government. Additional discussion regarding PCE will be presented in the forthcoming Feasibility Study being prepared for OMS 28."

ADEM agrees that the discussion regarding the responsibility of the PCE contamination should be included in the forthcoming Feasibility Study. However, as stated by ADEM in the February 25, 2021 letter, ADEM has not concurred with this statement and will not be able to fully evaluate this statement until receipt of the Feasibility Study. Furthermore, including this statement as fact in the revised Risk Assessment Report may delay ADEM's concurrence with the completeness and accuracy of the risk assessment. Please address.

SLERA Comment 3: Please see the above evaluation of ALARNG's response to "SLERA Comment 2."