LANCE R. LEFLEUR
DIRECTOR

ADEM
Alabama Department of Environmental Management
adem.alabama.gov

KAY IVEY
GOVERNOR

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

October 12, 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 Comment:** *Risk Assessment Report for Organizational Maintenance Shop 28 (OMS 28), Revision 1,* dated May 19, 2022
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.

Comments regarding ALARNG's subject document are provided in the attached document. A revised document or appropriate revisions addressing all comments should be submitted to the Department within 45 days of receipt of this letter. If ALARNG chooses to submit revised pages, please date and code each page. For example, **25(r-10/15/22)** would be page 25 revised October 15, 2022.

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (Fax)

Decatur Branch
2715 Sandlin Road, S. W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (Fax)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (Fax)

Mobile - Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (Fax)

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,

Jason Wilson, Chief
Governmental Hazardous Waste Branch
Land Division

JJW/ATM/CJM

Attachment

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

ATTACHMENT
ADEM Review Comments
Risk Assessment Report for OMS 28, Revision 1
Mobile, Alabama

1) **Section 3.6:** This section states, "USEPA [U.S. Environmental Protection Agency] recognizes a generally acceptable cumulative excess cancer risk range (i.e., total risk to a given receptor) of between 1×10^{-6} and 1×10^{-4}." Section 3.6.3 uses an acceptable risk of 1×10^{-4} to screen each potential receptor. However, Section 6.7.1 of the Alabama Risk-Based Corrective Action Guidance Manual states that any receptor with a cumulative risk greater than 1×10^{-5} should be carried forward into the development of risk-based target levels (RBTLs). This discrepancy in acceptable cumulative risk has excluded several receptors from the development of RBTLs. Please revise the document to use a cumulative risk of 1×10^{-5} instead of 1×10^{-4}.

2) **Section 3.6.3:** This section states, "Significant contribution to risk is defined by USEPA Region 4 as… a chemical-specific hazard quotient (HQ) of 0.1 or greater contributing to a noncarcinogenic hazard index (HI) greater than 1." Table E-2 lists a HQ of 0.2 for tetrachloroethene (PCE) in subsurface soil, contributing to an overall HI of 240 for the Future Construction Worker (Parcel A). However, tetrachloroethene is not listed as a contaminant of concern (COC) in Table 18 for the Future Construction Worker (Parcel A), Subsurface Soil." Please address.

3) **Section 4.3.3.1 and Table 23:** A bioaccumulation equation for tetrachloroethene was not identified in the Table 23 reference (USEPA, 2003 Attachment 4-1, Guidance for Developing Ecological Soil Screening Levels (Eco-SSLs), Exposure Factors and Bioaccumulation Models for Derivation of Wildlife Eco-SSL. OSWER Directive 92857-55). Please clarify if a surrogate chemical for tetrachloroethene was used in the calculation of the Bioaccumulation Factor from Soil to Invertebrate (BAF_{inv}) in both Section 4.3.3.1 and Table 23. If so, please revise the text and table to indicate that a surrogate was used.

4) **Section 4.3.3.2 and Table 25:** Please revise Section 4.3.3.2 and Table 25 to include a note stating that 1,1,2,2-tetrachloroethylene was used as a surrogate for the PCE toxicity reference value.

5) **Section 4.3.5.1:** This section states, "SQLs [Sample Quantitation Limits] and reps generally are 5 to 10 times the MDL [Method Detection Limit]…" Please define the word "reps" or correct the typographical error.