



NATIONAL GUARD BUREAU

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October 2, 2024

Mr. Colin Mitchell
Governmental Hazardous Waste Branch
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2400

Dear Mr. Mitchell:

Enclosed for your review is the Feasibility Study Revision 1 for Organizational Maintenance Shop 28 located in Mobile, Alabama, dated October 2024. This Feasibility Study Revision 1 replaces the previously provided Feasibility Study dated October 2023. This Feasibility Study Revision 1 addresses and incorporates our responses to your review comments on the Feasibility Study provided in your letter dated July 5, 2024. Our responses to your comments are an enclosure to this letter.

Two hard copies and two CDs containing the Feasibility Study Revision 1 are provided for your use. A redline/ strikeout version of the text will be emailed to you to assist you in your backcheck of comment incorporation. Request your review and approval by December 2, 2024.

If you have questions or concerns, please contact me at queenie.m.mungin-davis.civ@army.mil or (703) 607-7955.

Sincerely,

Queenie M. Mungin-Davis, PG
Program Manager, Cleanup and Restoration
Branch, G-9 Army National Guard

Enclosure

**U.S. Army National Guard (ARNG) Responses provided October 2, 2024 to
Alabama Department of Environmental Management (ADEM) Comments dated July 5, 2024 on
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ADEM GENERAL COMMENT 1. Section 1.3.1: Perchloroethylene (PCE) and trichloroethylene (TCE) contamination is present in soil and groundwater in the following parcels: A, B, C, D, E, F, and G (Figures 1-10, 1-11, and 1- 12). ALARNG states that the PCE contamination is unrelated to Mobile OMS 28 site activities and is, therefore, not the responsibility of ALARNG. Alternatives presented by ALARNG in this Feasibility Study only address TCE contamination in soil and groundwater. Parcel F is often referred to as “Mobile Airport Authority (MAA) Property.” Brookley Air Force Base (AFB) was closed in 1969, and the MAA was created in 1972 when Department of Defense (DoD) returned Brookley AFB to the City of Mobile (Section 1.3.1).

Alabama Armory Commission owns the 5.9 acres of property on which the former OMS 28 is located. Currently, ALARNG operates the Field Maintenance Shop (FMS) at this site. The Alabama Armory Commission has owned this property since 1953 when the City of Mobile conveyed 25.66 acres to the Commission. In 2002, 6.43 acres west of the OMS 28 property reverted back to the City and the City subsequently conveyed the property to the MAA (SAIC, May 2013).

Please revise the FS to state whether or not Parcel A was included in the 6.43 acres west of OMS 28 that reverted back to the City of Mobile. If it was not, then a more extensive property ownership records search may be appropriate to determine who previously owned Parcels A, B and D from 1969, when Brookley AFB was closed and returned to the City of Mobile, to the present. Please submit this information to ADEM for review.

ARMY RESPONSE TO GENERAL COMMENT 1: PCE and TCE are not present in soil on all of the land parcels listed in ADEM General Comment 1. PCE is only present in soil above its Industrial Regional Screening Level (RSL) on Parcel A. PCE is only present in soil above its Residential RSL on Parcel A. PCE is present above its MCL-based Soil Screening Level (SSL) for the Protection of Groundwater on Parcels A, E, and F. TCE is present in soil above its MCL-based SSL for the Protection of Groundwater on Parcels A, E, and F. There is one soil sample location (HA-15) on Parcel E with TCE slightly above its Residential RSL. Refer to ARMY RESPONSE TO GENERAL COMMENT 3 for additional information regarding PCE and TCE in soil. PCE is only detected in groundwater on Parcels A and F. There is no PCE in groundwater on Parcel E.

Three figures have been added to Appendix C in the FS. Figure C-15 shows all soil and groundwater PCE detections without TCE soil and groundwater detections. As described in the third paragraph of the Background section in Appendix C, PCE was detected at 3 locations on Parcel E (ALARNG property) at concentrations that only slightly exceeded the soil screening level (SSL; estimated concentrations of 0.00252 milligram per kilogram [mg/kg], 0.00253 mg/kg, and 0.00505 mg/kg at HA-5, HA-7, and HA-13, respectively). Figure C-16 provides a three-dimensional view looking to the north of the PCE soil and groundwater results. Figure C-17 presents a west to east slice through the PCE soil and groundwater detections. PCE soil concentrations are much higher on Parcel A and exist in both surface and subsurface soil. PCE is only detected in groundwater on Parcels A and F. These three figures in conjunction with other figures provided in Appendix C (Figures C-2, C-4, C-8 through C-13) clearly demonstrate that the PCE detections in surface and subsurface soil and groundwater on Parcel A and in groundwater on Parcel F are not associated with former activities conducted by the ALARNG on Parcel E. The source and time of the PCE release(s) on Parcel A is unknown.

Parcel A was not included in the 6.43 acres of OMS #28 property that was reverted back to the City of Mobile and subsequently conveyed from the City of Mobile to the MAA. The quitclaim deed for this transaction was included in Appendix N of the May 2013 Remedial Investigation for OMS #28. A

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copy of Appendix N is included as **Attachment A** to these Response to Comments. Section 1.3.1 in the FS has been updated to reflect that this property transaction was for Parcel F only.

The Alabama Armory Commission never owned Parcels A, B, and D and is not responsible for the release of PCE in surface soil on Parcel A. Ownership research is more appropriately conducted by ADEM as the regulatory authority because ADEM can compel landowners to address releases on their property.

ADEM GENERAL COMMENT 2: Please include any historical figures/maps that display a distinct visual boundary between Parcels A and F during the time of the contaminant release.

ARMY RESPONSE TO GENERAL COMMENT 2: Historical aerial photographs from EDR Aerial Photo Decade Package dated February 24, 2015, are included as **Attachment B** to these Response to Comments. The EDR Aerial Photo Decade Package is also included as Attachment 1 in Appendix C of the FS.

ADEM GENERAL COMMENT 3: The FS states that according to an interview with a retired ALARNG employee, a cleaning agent named “gunk” was used at Mobile OMS 28 in the 1960’s and 1970’s. According to Material Safety Data Sheet, “gunk” is largely composed of PCE. This would indicate that PCE was used on site at OMS 28. Please address.

ARMY RESPONSE TO GENERAL COMMENT 3: The August 2015 Louis Berger Historical Research Report is the source for where the retired ALARNG employee identified the former use of Gunk cleaning agent at the site in the 1960s and 1970s. No official written record of its use exists.

The concentration of PCE detected in surface soil on ALARNG property (Parcel E) is vastly different from the concentration of the PCE detected offsite on Parcel A and should not be lumped together or treated as equal. As described in Section 1.3.7.1 and illustrated on Figure 1-5 of the FS, PCE was detected at 3 locations on Parcel E (ALARNG property) at concentrations that only slightly exceeded the SSL (estimated concentrations of 0.00252 mg/kg, 0.00253 mg/kg, and 0.00505 mg/kg at HA-5, HA-7, and HA-13, respectively). The SSL for PCE is 0.0023 mg/kg. MW-8, which is located in the middle of these low level PCE soil detections and OMS-28-3, which is located approximately 60 feet north and downgradient of MW-8 have never had PCE detected in them. This indicates that leaching of PCE from the historical low level detections in surface soil on Parcel E to the underlying groundwater is not occurring. Refer to Figure 1-5 of the FS for the soil sample and monitoring well locations.

Contrast that against the PCE soil source area identified on the offsite vacant residential parcel (Parcel A), which is now owned by the City of Mobile Water and Sewer Commission. The old ruins of a small shack were found within 15 feet of soil sample OMS-28-SB24, which had the highest concentrations of PCE (329 mg/kg at 0-1 feet below ground surface [bgs]) detected during the 2016-2017 Supplemental Data Gap Investigation (SDGI). PCE exceeded the residential RSL (8.1 mg/kg) and industrial RSLs (39 mg/kg) in surface soil and upper subsurface soil (3 feet bgs), and PCE exceeded the residential RSL in lower subsurface soil (approximately 5 feet bgs). This lower subsurface soil hit is approximately 1 foot above the water table and likely is contributing to the PCE detected in the underlying groundwater.

OMS-28-SB24 is located over 200 feet northwest of the fenced ALARNG property (Parcel E) and is within 60 feet of active railroad tracks that run parallel to Interstate 10. As such, the identified PCE surface spill is suggestive of offsite activity that was not the result of historical ALARNG activities associated with

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OMS #28. It is also suggestive of a PCE spill that occurred more recently than the 1960s and 1970s timeframe of the Gunk usage indicated by the former ALARNG employee because the concentrations of PCE detected in surface and subsurface soil on Parcel A are orders of magnitude higher than the low concentrations of PCE detected in soil on Parcel E.

Section 1.3.7 and Appendix C in the FS present a comprehensive discussion of why PCE in soil and groundwater is not related to historical ALARNG property use.

ADEM GENERAL COMMENT 4: Table 2-1 lists the remedial goals (RGs) by parcel. RGs are not provided for Parcels A, B, C, F, G, and H for various reasons stated in the table's footnotes. Please see the comments below regarding these footnotes. Also, General Comment 7 below further addresses groundwater sampling at OMS 28.

- a. Parcel A: *"RGs are not established for Parcel A because impacted groundwater is not the result of historical activities conducted on Parcel E (refer to Section 1.3.7.2 and Appendix C)."*

The Department does not agree with the conclusion that groundwater contamination on Parcel A is not the result of historical activities. The approximate groundwater plume presented in the Middle Surficial Aquifer sampling results shows a continuous plume extending from Parcel E into Parcel A. Please address.

- b. Parcel B: *"RGs are not established for Parcel B because impacted groundwater is the result of the breakdown of PCE from Parcel A to TCE on Parcel B (refer to Section 1.3.7.2)."*

The Department does not agree with the conclusion that groundwater contamination on Parcel B is the result of PCE contamination from Parcel A migrating to Parcel B and breaking down into TCE. The groundwater plume presented in the Middle Surficial Aquifer sampling results shows the extent of the plume ending on the boundary between Parcels A and B. However, this plume boundary is interpolated between several monitoring wells. If the plume is assumed to be migrating from Parcel A to Parcel B, it must be assumed that the plume extends to the next downgradient well that exhibits concentrations below respective Maximum Contaminant Levels (MCLs). Please address.

- c. Parcel C: *"RGs are not established for Parcel C because groundwater results collected during the [Supplemental Data Gap Investigation] have never exceeded the maximum contaminant levels (MCLs) (refer to Section 1.3.7.2)."*

Groundwater monitoring wells located on Parcels B and D exhibit concentrations above MCLs in several wells. These portions of the plume are visualized as an interpolated plume centered around a single well. If these plume boundaries are extended to the nearest downgradient well that exhibits concentrations below respective MCLs, it is possible that the groundwater contamination on Parcels B and D will extend into Parcel C. Please address.

- d. Parcels G and H: *"There was no risk identified for Parcels G or H."*

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Please revise this statement to reflect whether or not an *acceptable* risk is present at Parcels G or H.

ARMY RESPONSE TO GENERAL COMMENT 4:

- a. As described in the third paragraph of Section 1.3.7.2 and shown on Figure 1-10 (Upper Surficial Aquifer), there are two separate plumes identified in the Upper Surficial Aquifer. There is a TCE only plume located on Parcel E and a separate PCE and TCE plume located on Parcels A and F. The highest concentration (40,000 micrograms per liter [$\mu\text{g/L}$]) of PCE detected in groundwater was detected at discrete groundwater grab sample GW22 on Parcel A, which is located within approximately 10 feet of the highest PCE detection in a soil sample at OMS-24-SB24, which was previously discussed in the response to Comment 3. Elevated concentrations of TCE are also located in the Upper Surficial Aquifer on Parcel A.

A bio trap deployed for a month in December 2021 in monitoring well OMS-28-5, which is located immediately south of Parcel A, detected the presence of moderate concentrations of bacteria that are capable of using PCE and TCE as growth-supporting electron acceptors and can reduce PCE and TCE down to cis-1,2-DCE but no further. This provides evidence of a natural biological pathway from PCE to TCE that accounts for the presence of the elevated concentrations of TCE that were detected on both Parcels A and F.

In the FS, it can be seen that the two separate Upper Surficial Aquifer plumes (Figure 1-10) move both horizontal and vertically and eventually merge into one co-mingled plume in the Middle Surficial Aquifer (Figure 1-11) in the vicinity of discrete groundwater grab samples GW15, GW16, and GW17, all of which have low concentrations of TCE detected at 7.1 $\mu\text{g/L}$, 6.0 $\mu\text{g/L}$, and 6.7 $\mu\text{g/L}$, respectively. Even though these two separate plumes co-mingle in the Middle Surficial Aquifer, there is no mechanism or reasonable explanation for how PCE detected on Parcels A and F in both the Upper and Middle Surficial Aquifer can be derived from the TCE only plume that originates on Parcel E.

- b. Interpolation of the plume between monitoring points using mathematical interpolation techniques such as kriging is standard practice. The Maximum Contaminant Level (MCL) line of the plume boundary for a contaminant of concern is not drawn to a non-detect or monitoring point below the MCL but rather is determined by mathematical interpolation between the monitoring points.

Vertical migration from the Middle Surficial Aquifer (Figure 1-11) to the Lower Surficial Aquifer (Figure 1-12) along thin discontinuous clay lenses (refer to the approved SDGI [AECOM January 2019] for details on site geology and stratigraphy) in conjunction with natural biotic and abiotic degradation and dispersion likely resulted in the low TCE concentration of 10 $\mu\text{g/L}$ that was detected at discrete groundwater grab sample GW43 in the Lower Surficial Aquifer on Parcel B. Discrete groundwater grab sample GW24 that was collected from the Middle Surficial Aquifer on Parcel A is located within the vicinity of GW43, and PCE and TCE were detected in GW24 at 100 $\mu\text{g/L}$ and at 35.9 $\mu\text{g/L}$, respectively. There are no discrete groundwater grab samples with non-detections for PCE or TCE located in the Middle Surficial or Lower Surficial Aquifers between GW24 and GW43.

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- Only TCE contamination was detected on Parcel D in the Middle Surficial Aquifer and in the Lower Surficial Aquifer. The TCE concentrations detected on Parcel D (8.1 µg/L at GW46 in the Middle Surficial Aquifer and 27.1 µg/L at GW64 and 9.02 µg/L at GW75 in the Lower Surficial Aquifer) are all lower than the PCE and TCE concentrations detected at GW24 on Parcel A. Furthermore, there are non-detect concentrations for both PCE and TCE at discrete groundwater grab samples GW45 and GW57 that are located on Parcel B in both the Middle and Lower Surficial Aquifers. These non-detections are located between the TCE detection on Parcel B at GW 43 and the TCE detections on Parcel D at GW64 and GW75. Considering all of the information together indicates that the low TCE concentration detected at GW43 in Lower Surficial Aquifer most likely originated from the PCE and TCE plumes that exist in the Middle Surficial Aquifer on Parcel A. Therefore, as stated in the FS, RGs are not established for Parcel B because the one detection of TCE in the Lower Surficial Aquifer is attributable to Parcel A, and Parcel A impact is not attributable to historical ALARNG activities as described previously in the response to Comment 4a.
- c. The Department should note that there are no monitoring wells installed on Parcels B and D. What is shown on Figures 1-10 through 1-12 are discrete Direct Push Technology groundwater grab samples that were conducted during the SDGI (AECOM, January 2019). The “plumes” are the extent of TCE or PCE in the groundwater based on mathematical interpolation using kriging as the industry standard. MCL boundaries should not be drawn to non-detect or locations below MCL; therefore, the plume boundaries should not extend to non-detect locations or locations below the MCL but rather mathematically interpolated between points. The interpretation of the extent of groundwater chemicals of concern above their MCLs was previously approved by ADEM in the January 2019 SDGI. The SDGI also discusses in detail how site stratigraphy dictates groundwater flow and plume migration. Also refer to the response for Comment 4b above regarding plume interpolation.
- d. Section 3.6.3 of the approved Risk Assessment Report (Revision 2; AECOM, March 2023) states no receptors were evaluated at Parcel G because COPCs were not identified in any media sampled at this parcel. This indicates an acceptable risk level for Parcel G. In this same section, an acceptable risk was also determined for Parcel H. The note on Table 2-1 has been revised to state that “RGs are not established for Parcel G and Parcel H because both parcels have no unacceptable risk”.

ADEM GENERAL COMMENT 5: Please address the following comments regarding the land use control (LUC) boundary proposed as Alternative 2 in Figure 4-1:

- a. The boundary is drawn around the approximate interpolated MCL boundary for the TCE contaminant plume. This aspect of the remedy will be impossible to evaluate unless this exact boundary is verified with samples collected from a series of groundwater monitoring wells placed along the curving LUC boundary. If the plume were to extend beyond this boundary in the future, or if the boundary is not exactly correct, the remedy would be considered ineffective and would have to be modified.

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b. As stated in Section 4.1.2.1, the LUC boundary extends into parcels that are not owned by ALARNG. ALARNG cannot implement LUCs on non-federally owned property without the permission of the landowner(s). Therefore, ALARNG should demonstrate that the landowner(s) are willing to implement and enforce the LUCs as proposed in ALARNG's selected remedy.

ARMY RESPONSE TO GENERAL COMMENT 5:

- a. The boundary is proposed based on the data presented and approved in the SDGI (AECOM, January 2019). Once a remedy has been selected and approved, additional monitoring wells will be installed during the remedial action phase of work to verify the LUC boundary.
- b. The LUC boundaries presented in the FS are proposed based on data from the SDGI collected in 2016 and 2017. Once a remedy has been selected and approved, additional monitoring wells will be installed during the remedial action phase of work to verify the LUC boundary. If at such time the LUC boundary encroaches onto privately owned land, the Army National Guard (ARNG) will coordinate accordingly with the affected landowner(s). The final LUC boundary will be determined following monitoring well installation, which may reduce the footprint of the LUC boundary.

ADEM GENERAL COMMENT 6: Please see General Comment 5(b) above and revise Alternative 3 accordingly.

ARMY RESPONSE TO GENERAL COMMENT 6: See response to General comment 5(b) above.

ADEM GENERAL COMMENT 7: The current groundwater monitoring well network in the surficial aquifer is insufficient to capture the extent of the groundwater contaminant plume. The monitoring wells are screened too shallow in the surficial aquifer, and the three deep wells are screened below the subject confining unit. Additional upper/middle surficial aquifer monitoring wells should be installed along with wells in the lower surficial aquifer around the periphery of the plume to track plume migration and effectiveness of any proposed remedy. Deeper wells should be installed such that their screened intervals penetrate the gray stiff clay (reportedly encountered between approximately 16 and 35 feet below land surface [bls]) by approximately 2 to 3 feet. This would ensure that chlorinated solvents can be detected at the top of the confining unit where the density of the contaminants drives them to migrate. The Department notes that Alternative 2 includes provisions for eight additional monitoring wells. Please address.

ARMY RESPONSE TO GENERAL COMMENT 7: The Remedial Investigation (Revision 2) for OMS #28 has previously been approved by ADEM in a letter dated August 8, 2023. In addition, detailed plume delineations were conducted both vertically and horizontally during the SGDI and subsequently approved by ADEM in a letter dated January 21, 2020. As described in the FS Section 4.1, installation of additional monitoring wells will be included in the Remedial Design/Remedial Action Work Plan and will likely include Upper/Middle Surficial Aquifer and Lower Surficial Aquifer monitoring wells. ARNG will not install monitoring wells that breach the 30-ft thick marine clay, which acts as a confining layer, isolating the aquifer below because this would create a preferential pathway for contamination into the clay unit.

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There are two deeper wells (OMS-28-1 and OMS-28-4) screened below the clay unit that are present onsite and have a history of non-detect or trace concentrations of TCE.

ADEM GENERAL COMMENT 8: The groundwater elevation reported at B-13/MW-9 on Figure 1-4 may indicate a perched water zone. This relatively high groundwater elevation appears to be the only data point in the western portion of the investigation area that indicates an eastward groundwater flow. Please provide any additional information or data points that support ALARNG’s assumptions regarding the groundwater flow in the western portion of the investigation area.

ARMY RESPONSE TO GENERAL COMMENT 8: Refer to the approved SDGI (AECOM, January 2019) for a discussion of the conceptual site model, site stratigraphy, and hydrogeology of the site and surrounding area. In addition, refer to the Environmental Sequence Stratigraphy (ESS) discussion in the SDGI (Section 2.6) and the additional potentiometric maps provided in the same report (Figure 3-2 and 3-3), which provide a detailed overview of the stratigraphy and multiple groundwater elevation events that were conducted at the site. The area near MW-9 is a topographical low, and standing water was observed in the area after heavy rainfall events during the field activities conducted for the SDGI. No additional investigation work will be conducted for the site. A water level measurement event will be conducted during preparation of the Remedial Design/Remedial Action Work Plan.

ADEM GENERAL COMMENT 9: Throughout the document, the text states that monitoring wells OMS-28-2 and OMS-28-6 have been destroyed. These wells should be abandoned as they can provide a vertical conduit for contaminated groundwater from the surficial aquifer to migrate into the deeper aquifer. Please address. Also, monitoring well MW-8 was reported to be damaged. Damaged wells must be repaired or replaced in accordance with the *Alabama Environmental Investigation and Remediation Guidance (AEIRG)*. Please provide the statuses of all damaged or destroyed wells.

ARMY RESPONSE TO GENERAL COMMENT 9: Well Abandonment will be included in the Remedial Design/Remedial Action Work Plan. The ARNG will abandon OMS-28-2 and OMS-28-6, assuming they can be located, during the Remedial Action phase of work for this site. Text has been added to Section 1.3.7.2 for OMS-28-6 and to Section 4.1.2.1.1 for OMS-28-2 explaining this. MW-8 will also be evaluated for damage at that time and replaced if necessary. The reinstallation of wells will be based on a reevaluation of the site monitoring well network, which will depend on the selected site remedy.

Human Health Risk Assessment Comments

ADEM HHRA COMMENT 10: Section 1.3.6.1.2 – Future Exposure Scenario: The text states, “...there is some level of carcinogenic risk and/or non-carcinogenic hazard for future receptors...” Please define a range of risk and/or Hazard Index estimates along with the appropriate receptor (e.g., future construction worker: 2E-05, future adult resident: 5E-05).

ARMY RESPONSE TO HHRA COMMENT 10: The details of levels of carcinogenic risk and/or non-carcinogenic hazard for future receptors along with hazard index estimates was detailed in the ADEM-approved Risk Assessment Report – Revision 2 (AECOM, March 2023). The commentor is directed to Table 18 of the referenced report. The FS does not reiterate the details of the risk assessment as extensive details have already been provided and approved by ADEM on May 25, 2023.

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ADEM HHRA COMMENT 11: Section 2.2 – Remedial Action Objectives: The text states, “While Parcel C has an identified future risk to a construction work...” Please revise the text to state “worker” instead of “work.”

ARMY RESPONSE TO HHRA COMMENT 11: The edit has been made in the redline strikeout (RLSO) version of the text provided with these responses to comments.

Screening Level Ecological Risk Assessment Comments

ADEM ERA COMMENT 12: Section 2.2 – Remedial Action Objectives: This section states, “In addition, there is no ecological risk.” This sentence should be removed from the middle of this paragraph as it is describing human health risk and is also not consistent with the description in Section 1.3.6, which states, “...potential for exposure and risk to ecological receptors is minimal.” Please address.

ARMY RESPONSE TO ERA COMMENT 12: The sentence has been deleted in the RLSO version of the text provided with these responses to comments.

ADEM ERA COMMENT 13: Section 5.1.1 – Overall Protection of Human Health and the Environment: The text states that “... there is no quantifiable risk to ecological receptors at this site (AECOM, 2023).” However, Section 1.3.6.2 states, “...potential for exposure and risk to ecological receptors is minimal. PCE in surface soil, the only COPEC identified and located on Parcel A, warrants identification as a final COPEC due to its high concentrations within a small area of surface soil.” Please revise Section 5 to be consistent with the ecological risk assessment report conclusions.

ARMY RESPONSE TO ERA COMMENT 13: The first sentence of the second paragraph in Section 5.1.1. has been changed to read, “Although there were no significant ecological risks identified for Parcel A...” to address the comment.