

Alabama Department of Environmental Management  
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February 25, 2016

CERTIFIED MAIL #

91 7108 2133 3936 7153 6033

Mayor Todd Strange  
City of Montgomery  
103 North Perry Street, Room 206  
Montgomery, AL 36104

**RE: ADEM Review and Comments:** *Draft Technical Work Plan – Downtown Environmental Assessment Project*; received January 22, 2016.  
Capital City Plume  
Montgomery County, Alabama  
Facility I.D. No. AL0001058056

Dear Mayor Strange:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the Downtown Environmental Alliance's (Alliance) *Draft Technical Work Plan – Downtown Environmental Assessment Project*. ADEM's comments are attached for your review. Please respond within 60 days of receipt of this letter.

If you have any questions concerning this matter, please contact Ms. Julie Ange of the Engineering Remediation Section at 334-270-5646 or via email at [jange@adem.state.al.us](mailto:jange@adem.state.al.us).

Sincerely,



Stephen A. Cobb, Chief  
Governmental Hazardous Waste Branch  
Land Division

SAC/ATM/JLA/akr

cc: Mrs. Ashley Mastin/ADEM  
J.P. Martin/CH2M



**ATTACHMENT**  
**ADEM Review Comments**  
***Draft Technical Work Plan –***  
***Downtown Environmental Assessment Project***  
**Montgomery, Alabama**

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- 1) **Section 3.0:** Please revise the screening levels used from preliminary screening values (PSVs) to regional screening levels (RSLs) in accordance with the forthcoming update to the Alabama Risk Based Corrective Action (ARBCA) guidance. Also, please ensure that updating these screening levels does not invalidate any conclusions being drawn from the historical data.
- 2) **Section 4.4:** According to Section 2.2, the bus maintenance facility has a well from which groundwater is used periodically for bus washing. It was tested in 2014 and found not to contain detectable levels of volatile organic compounds (VOCs). However, this facility is within the boundary of the northern plume. Though, based on the 2014 sampling results, the exposure pathway is not complete at this time, depending on plume movement, it could be complete in the future. This active well should not be left out of the conceptual site model (CSM) as a potential exposure source.
- 3) **Section 5.2:** The second paragraph states that “the deeper depth probe will be within several feet of the groundwater table as determined from the soil core....” Please clarify that the deeper depth probe will be placed in the vadose zone and above the capillary fringe as determined from the soil core.
- 4) **Section 5.3:** In addition to the proposed geotechnical sampling parameters, please also analyze the three Shelby tube samples for the fraction of organic carbon (FOC) content as that may also help evaluate the site specific potential for soil vapor attenuation in the vadose zone. It may also be useful in conducting a risk assessment, if necessary.
- 5) **Sections 5.4 and 6.1.3:** The proposed study interval for the hydraulic study at Cypress Creek is a two week time frame in the spring and summer. However, collecting piezometer and creek surface elevation measurements over month long intervals during both the spring and summer would better account for any local weather related extremes. Please address.
- 6) **Section 5.4:** At least one additional piezometer should be installed approximately 20–40 feet hydraulically upgradient of proposed piezometer TMPZ-1, as site conditions dictate. This piezometer should be fitted with a transducer and monitored concurrently with Cypress Creek and piezometer TMPZ-1 to provide a needed data point to evaluate the hydraulic interaction between groundwater and Cypress Creek.

- 7) **Section 5.4:** As part of the hydraulic study, please determine the mean sea level of the bottom of the creek channel closest to the gauging station for comparison to groundwater elevations.
- 8) **Section 6.1.1:** In addition to the proposed data results and evaluation, please provide historical groundwater sampling data tables to accompany the time series charts.
- 9) **Section 6.2:** Please provide construction details for all monitoring wells, piezometers, and public well PW-09W including installation dates, materials of construction, diameters, total depths, and screen intervals in tabular form as part of the Environmental Investigation Report.
- 10) **Figure 4-1:** Please explain why former public supply well PW-09W was not included in the northernmost tetrachloroethene (PCE) plume boundary, since this well was impacted.
- 11) Please include the date of data collection in the legend of any future maps depicting soil data, groundwater data, or potentiometric surfaces.
- 12) Please provide groundwater concentration maps depicting historic one time grab samples including the concentrations of the contaminants of concern (COCs) exceeding their respective maximum contaminant levels (MCLs) or RSLs.