



Alabama Department of Environmental Management
adem.alabama.gov

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

October 31, 2019

CERTIFIED MAIL # 91 7199 9991 7039 3055 4581

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

Re: **ADEM Review and Comment:** *Final Remedial Action Report – Downtown Environmental Assessment Project (DEAP)*, dated October 25, 2019
Montgomery, Montgomery County, Alabama
Facility ID No: AL0 001 058 056

Dear Mayor Strange:

The Alabama Department of Environmental Management (ADEM or the Department) has completed the review of the aforementioned document, received on October 28, 2019. Based upon this review, the Department has determined that the Downtown Environmental Alliance's (DEA) *Final Remedial Action (RA) Report* is incomplete and additional information will be required.

Comments regarding the RA Report are provided in the attached document. A revised report or appropriate revisions addressing all comments should be submitted within 5 days of receipt of this letter. Responses may be submitted in the form of a revised document or appropriate revised pages, tables, and figures to be inserted in the original submission. If the DEA chooses to submit revised pages, please date or code each page and figure. For example, 15(r-11/25/19) would be page 15 revised November 25, 2019.

To facilitate the Department's review, please return a copy of the Department's comments with annotations in the left or right margin, which identify the plan revised pages, figures, tables, etc. where the DEA's response to each comment item is recorded. In addition, please provide a redline/strikeout version of the revised report. Within the transmittal letter of the revised report, there should be a statement certifying that all changes to the revised report are shown in the redline/strikeout version.



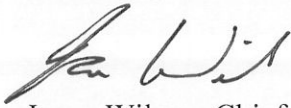
Mayor Todd Strange

October 31, 2019

Page 2 of 4

If you have any questions on this matter, please contact Ashley Mastin of the Remediation Engineering Section at (334) 271-7797 or via email at atmastin@adem.alabama.gov.

Sincerely,

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

Jason Wilson, Chief
Governmental Hazardous Waste Branch
Land Division

Attachment

JJW/ATM/tlp

Cc with attachment: J.P. Martin, Jacobs
Glen Davis, Jacobs (via email)
Ashley Cousins, AC ESS, LLC
Samantha Downing, ADEM

ADEM Review Comments
Final Remedial Action Report
Downtown Environmental Assessment Project
Montgomery, Alabama

General Comment

1. Throughout the document and attachments, the DEA refers to the template General Environmental Covenant (EC) as “voluntary” or “optional”. While the Department understands that the DEA cannot legally compel property owners to enter into an EC on their own property, it is the DEA’s responsibility to ensure that the ECs necessary for the remedy to be protective of human health and the environment are pursued and implemented. Please address and revise the document and attachments as necessary.

Specific Comments

1. **Page 1, Introduction:** Please revise the first paragraph to state that the RAs are in accordance with the ADEM-approved *Institutional Controls Plan*, as this is the primary decision document for the selected remedy.
2. **Page 1, Introduction:** Please define the abbreviation “PCE” when it first occurs in the document.
3. **Page 1, Introduction:** Please revise the text to clarify that the Montgomery supply well was a drinking water supply well.
4. **Page 1, Introduction:** In the second paragraph of this section, the DEA refers to previous investigations conducted by ADEM, the US Environmental Protection Agency (EPA), etc. Because these investigations were conducted under the site name Capitol City Plume, please add clarity in the text that the CCP and the DEAP are the same site.
5. **Pages 1-2, Introduction:** For the listed document submittals, it appears that the dates provided as document “complete” dates are actually the submittal dates. Please revise the text to reflect this information.
6. **Page 2, Introduction:** The Department notes that the submittal and concurrence dates for the DEA’s Risk Assessment/Alternative Analysis Report are not included in the text as they are for the other documents listed. Please address.
7. **Page 2, Introduction:** Please define the abbreviation “TCE” when it first appears in the document.
8. **Page 2, Introduction:** Please provide clarification as to the source of the trichloroethylene (TCE) as it pertains to the statement that “the groundwater plume is not the source of the TCE.”

9. **Page 2, Chronology of Events:** In the note after the second paragraph, the Department recommends adding the section name to better direct the reader to the reference.
10. **Page 2, Performance Standards and Construction Quality Control:** The font format of the section heading is different from the other section headings in the document making it difficult to distinguish from the body text. Please address.
11. **Page 3, Performance Standards and Construction Quality Control:** Please revise the reference to “Figure 3-1 of the ICP” to “Figure 3-1 in Attachment 3”.
12. **Page 3, Certification that Remedy is Operation and Functional:** In the bullet for Attachment 2, please revise the reference to “Figure 3-1 of the ICP” to “Figure 3-1 in Attachment 3”.
13. **Page 4, Certification that Remedy is Operation and Functional:** In the bullet for Attachment 3, please revise the reference to “Figure 3-1 of the ICP” to “Figure 3-1”.
14. **Page 4, Certification that Remedy is Operation and Functional:** In the bullet for Attachment 4, please revise the reference to the attached “ICP Map” to “IC Map”.
15. **Page 4, Operation and Maintenance:** Please provide a reference for the Low-Flow Groundwater Sampling standard operating procedure.
16. **Attachment 3, Inspection Checklist:** The Institutional Controls Annual Inspection Checklist form refers to an “Attachment 1”; however, there is no attachment provided. Please provide a copy of Attachment 1 with the template checklist.
17. **Attachment 3, Interview Documentation:** The DEA does not provide any information regarding the types of questions or information that is meant to be gathered from the Interviews. Please provide a sample of the questions that will be asked for each interview.