

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

May 22, 2020

ELECTRONICALLY TRANSMITTED

Ms. Carol Monell, Director
Superfund Division
USEPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Re: **ADEM Recommendation for De-Proposal of the Capitol City Plume Site from the National Priorities List**
Capitol City Plume, Montgomery, Alabama
Facility I.D. No. AL0001058056

Dear Ms. Monell:

The Alabama Department of Environmental Management (ADEM or the Department) is providing additional documentation regarding its previous request that the U.S. Environmental Protection Agency (EPA) withdraw the proposal to list the Capitol City Plume (CCP) site on the National Priorities List (NPL). The Department's request for de-proposal was originally submitted on November 13, 2019. The request was provided in accordance with the Memorandum of Agreement (MOA) between EPA and the Department. Enclosed is a Technical Memorandum that summarizes all actions that have taken place at the CCP since its discovery in 1993. In addition, electronic copies of the decision documents for the project and a copy of the November 2019 de-proposal request are also enclosed.

Pursuant to the MOA, ADEM committed to ensure that response actions are taken at least as quickly, if not sooner than if EPA were expected to respond. Under EPA oversight, the site underwent multiple investigations and actions between 1993 and 2015. Under ADEM oversight since the deferral in 2015, the site has progressed from the investigative phase to final remedy implementation. The Department has not used any federal funding to conduct any response actions or to provide oversight for the CCP; all costs have been funded by the DEA. Community acceptance has been facilitated and demonstrated in accordance with the DEA's Community Involvement Plan (CIP), which includes the organization of the community outreach group (COG). The COG is made up of business and property owners within the CCP area. Additionally, the CIP established a public website to provide timely updates on the CCP and to serve as a repository of all submitted documents. Public notice periods have been held prior to approval of decision documents and modifications to the Settlement Agreement for Site Response between ADEM and the DEA.

During a meeting on January 23, 2020, and following a subsequent site visit on March 10, 2020, EPA Region 4 requested additional information to support the request for de-proposal, specifically regarding the evaluation of vapor intrusion risks. Based on modeling conducted to identify potential



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areas at risk of vapor intrusion, two areas were found to pose a potential future risk for vapor intrusion. These are located in areas where buildings do not currently exist and have environmental covenants in place to restrict any type of construction. The information provided in the enclosed Technical Memorandum addresses EPA's questions.

The Department has fulfilled the requirements of the MOA. The MOA calls for a CERCLA-protective cleanup with response actions protective of human health and the environment that address site-related contamination in an appropriate manner and to the extent practicable. In complying with requirements of the MOA, response actions have been taken to ensure that the CCP no longer poses any unacceptable risks to human health and the environment. The response actions have been demonstrated to be protective of human and ecological receptors according to the risk assessment that was conducted by the Downtown Environmental Alliance (DEA). All environmental media and potential exposure routes were evaluated in the risk assessment. The response actions include: 1) the 1993 emergency soil excavation of the source area following its discovery at the RSA Energy Plant, 2) the permanent abandonment of all public water supply wells associated with the North Well Field in downtown Montgomery, 3) the installation of the phytoremediation plot in 2010 and ongoing maintenance of other trees in the downtown area, 4) the permanent closure of all private wells within the CCP site boundary, and 5) the implementation of institutional controls, including environmental covenants, within the CCP site area to prohibit groundwater use and to address future vapor intrusion risks.

The Department has determined the remedy to be protective of human health and the environment in accordance with its hazardous waste cleanup program authority. Therefore, withdrawal of the proposal to add the Capitol City Plume site to the NPL is now appropriate. The Department requests that EPA Region 4 submit a De-Proposal Memo to EPA Headquarters for final approval and that the De-Proposal of the Capitol City Plume be published in the Federal Register as part of the Fall 2020 updates to the NPL. Please note that future monitoring activities, enforcement of institutional controls, and five-year reviews will be conducted under the ongoing oversight of the Department in accordance with the ADEM/DEA Settlement Agreement for Site Response and the ADEM/EPA MOA.

If you have any questions regarding this matter, please contact Jason Wilson, Chief of the Governmental Hazardous Waste Branch via e-mail at jwilson@adem.alabama.gov or at (334) 271-7789.

Sincerely,



Stephen A. Cobb, Chief
Land Division

Enclosures

SAC/JJW/ATM/RSD/tp

cc: Lance LeFleur, ADEM
Ashley Mastin, ADEM
Rusty Kestle, US EPA Region 4
Sydney Chan, US EPA Region 4

Mary Walker, US EPA Region 4
Caroline Freeman, US EPA Region 4
Ben Bentkowski, US EPA Region 4
Norman Ahsanuzzaman, US EPA Region 4

Recommendation to De-propose from the National Priorities List (NPL) – Downtown Environmental Assessment Project (formerly the Capital City Plume)

May 13, 2020

Introduction

With this Technical Memorandum (TM), the Downtown Environmental Alliance (DEA) is providing documentation to support the de-proposal of the Downtown Environmental Assessment Project (DEAP; formerly the Capital City Plume) from the NPL. The original proposal was published in the Federal Register on May 11, 2000 (30489-30495 Federal Register, Vol. 65, No. 92). This request is supported by the Alabama Department of Environmental Management (ADEM), which is overseeing the site cleanup pursuant to the final Settlement Agreement for Site Response, which was revised and signed in October 2019 (originally signed on September 30, 2015) by ADEM and the DEA. This settlement agreement, along with other past documents referenced in this letter, are included on CD as an attachment. The purpose of this TM is to provide the reader with a complete overview of the project and describe the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-equivalent process that was followed to support de-proposal of the DEAP.

Site History and Previous Remedial Action (Prior to DEA involvement; 1991-2011)

This section provides a brief description of the site history and remedial actions taken prior to the formation of the DEA. A more complete historical summary can be found in Section 2.1 of the final Technical Work Plan, which is included in Appendix A at the end of this TM.

- In 1991, tetrachloroethylene (PCE) was detected in former public water supply well PW-9W. The Montgomery Water Works and Sanitary Sewer Board of the City of Montgomery, Alabama (MWWSSB) closed the North Well Field (located north of the current plume footprint) wells in the early 1990s, eliminating the potential for consumption of potentially contaminated groundwater. The source of drinking water for the City of Montgomery (City) has since been supplied by surface water intakes from the Tallapoosa River (located several miles upstream of downtown Montgomery) or well fields southwest of Montgomery (located approximately 8 miles south of downtown Montgomery), and the western well field, which has been in existence for approximately 80 years. Based on groundwater flow and distance, these water sources are not within the plume nor threatened by the plume.
- PCE was also encountered during the construction of the Retirement Systems of Alabama (RSA) Energy Plant in 1993. An emergency removal action was conducted in 1993 by the contractors excavating at the RSA Energy Plant. The remedial action included the removal of contaminated soil and groundwater, and non-aqueous phase liquid. This action effectively eliminated the PCE source area at the RSA Energy Plant construction area (located one block east of the RSA Tower in downtown Montgomery) as supported by the significant decrease in PCE concentrations in Monitoring Well MW-1S (located adjacent to and downgradient of the RSA energy plant excavation) from greater than 607 ppb in 1993 to less than the MCL since 2010.

- In 1995, ADEM conducted a Preliminary Assessment of the soil and groundwater around the RSA Energy Plant. No specific sources of the PCE were identified; however, the report identified numerous historical drycleaners in the downtown area.
- In May 2000, the site was proposed by EPA for inclusion on the NPL because of the potential threat to the public water supply. This potential threat was based on the population potentially exposed to contaminated groundwater, based on EPA's Hazard Ranking System scoring of the site.
- Between 1999 and 2001, EPA contracted Black & Veatch to conduct a Remedial Investigation (RI) to evaluate the nature and extent of groundwater contamination because of the PCE discovered in downtown Montgomery groundwater. During this investigation, 16 permanent and 16 temporary wells were installed to monitor the vadose zone and the top and bottom of the uppermost aquifer, estimate hydraulic conductivity, and to evaluate the nature and extent of groundwater contamination. Sixty-six subsurface soil samples also were collected to characterize potential site source areas. The RI concluded that contaminants likely originated from multiple sources within the downtown Montgomery area and the groundwater exposure pathway to residents is incomplete.
- In October 2002, the City and EPA entered into an Administrative Order by Consent that called for the completion of the CERCLA activities associated with the project, including the completion of a Feasibility Study (FS), and selection of a final remedy for the project. In 2003, the City contracted Malcolm Pirnie to develop a FS for the project area. The FS evaluated potential remedial options. Institutional controls and groundwater monitoring were retained as remedial options for implementation.
- The City passed a groundwater ordinance on September 16, 2003 to prohibit well drilling in the downtown area. This action significantly reduces the potential for ingestion or dermal exposure pathways to groundwater for downtown employees and residents.
- In 2004, the Agency for Toxic Substances and Disease Registry (ATSDR) issued a Public Health Assessment Report for the site. ATSDR noted that because of the quick response by MWWSSB in removing the contaminated well from service and the dilution of any contaminants that may have been present due to blending in the Montgomery water supply system, the site represented "no apparent public health hazard."
- In September 2004, EPA drafted a Record of Decision (ROD) document for the Capital City Plume site. This draft ROD concluded that no CERCLA remedial action was necessary for the site and that monitoring would be conducted to verify that no unacceptable exposures to risks posed by the site would occur in the future. Also, a determination was made that no remedial action was necessary at the site due to previous actions conducted by the City and MWWSSB. The ROD was never finalized by EPA.
- In 2005 and 2006, the City developed a groundwater monitoring plan under EPA review. Using the available groundwater monitoring network (up to 14 wells), groundwater sampling was conducted in 2007, 2009, 2010, and 2011 by the City, U.S. Geological Survey (USGS), and EPA (2010 and 2011), in accordance with the conditions outlined in the draft ROD.
- In 2005 and 2011, the MWWSSB contracted a licensed well driller to decommission and abandon (i.e., permanently grout) the wells formerly associated with the North Well Field, thus completely eliminating the wells from future use. The MWWSSB retained Well PW-9W for future environmental monitoring purposes, until it was permanently abandoned in 2019.

- From 2008 to 2010, USGS and EPA conducted tree tissue, pore water, and groundwater surveys in the downtown Montgomery area as part of a technology assessment for the use of tree core data to assess groundwater quality. Chlorinated volatile organic compounds (VOCs) were detected in tree core samples collected from across the site, including four trees in the downgradient portion of the plume (three trees from near the Cypress Creek area and one tree near MW-12S). Detection of the chlorinated VOCs suggests phyto-uptake is occurring in the downgradient portion of the plume.
- In 2010, EPA and USGS sampled indoor air and collected soil vapor samples near the County Annex III and Attorney General (AG) buildings based on complaints of indoor air quality. Corrective measures were taken at both buildings to address the indoor air quality, including installation of a filtration system in the County Annex building and replacement of carpet in the subbasement of the AG building, which resolved the odor issues in these buildings. Neither of the indoor air issues at these two buildings were found to be related to the groundwater plume.
- In 2010, the City, in collaboration with EPA constructed a demonstration phytoremediation plot consisting of clonal cottonwood trees in the central area of the plume. This location was located within the footprint of the Capital City Plume and was intended to provide remediation of the PCE contaminated groundwater.

Proposed NPL Listing and Formation of the Downtown Environmental Alliance

In June 2012, the City developed a working group to complete the investigations needed to avoid final inclusion on the NPL. In November 2012, EPA sent a letter to the City of Montgomery requesting an Environmental Action Plan (EAP) to present the technical strategy for addressing the remaining environmental concerns related to potential contamination in the downtown portion of the City. The November 2012 letter also noted three main items of concern that should be addressed in such an EAP:

- Develop a strategy to evaluate the potential for soil vapor contamination within a 47-block area of downtown Montgomery.
- Further evaluate the presence of the soil vapor contamination previously identified in the vicinity of the County Annex III Building, at 101 South Lawrence Street.
- Further evaluate the need for additional environmental sampling in the vicinity of the current Alabama AG Building at 501 Dexter Avenue.

An EAP to address the issues identified in EPA's November 12, 2012 letter was submitted to EPA in February 2013. Following review, EPA identified additional technical issues in a response letter dated September 19, 2013. The three additional technical issues identified by the EPA were as follows:

1. Identify and delineate any contaminant source areas in order to evaluate the feasibility of eliminating or controlling ongoing impacts by soil vapor and groundwater at the site.
2. Evaluate the nature and extent of contaminated groundwater and surface water in Cypress Creek in support of the objectives to restore groundwater to beneficial use within a reasonable timeframe at the site.
3. Provide an assessment of the pathways and quantitative risks posed by the site, including potential exposure to contaminated groundwater and soil vapor linked to previously identified source areas.

The EAP was developed to address these concerns using both scientifically defensible methodologies and industry-accepted practices and testing methods. The City resubmitted a draft EAP to EPA in December 2013. The document was subsequently finalized in March 2014, and EPA concurred with it in May 2014.

Following acceptance of the EAP, the City facilitated the formation of a group of voluntary participants to respond to the environmental issues and concerns described in the November 2012 letter from EPA to the City. This group is known as the Downtown Environmental Alliance. The DEA consists of the following members:

- City of Montgomery–Facilitator
- Alabama Department of Education
- Alabama Department of Transportation
- Alabama Department of Public Safety
- The Advertiser Company
- County of Montgomery
- MWWSSB

On September 30, 2015, the DEA was formalized by the signing of the Site Participation Agreement by its members. Also, the regulatory management of the DEAP was formally deferred from EPA to ADEM oversight through the execution of a Memorandum of Understanding signed by EPA and ADEM. Also, on September 30, 2015, the DEA and ADEM signed the original version of the Settlement Agreement for Site Response, which established the regulatory steps and documents to complete the CERCLA-equivalent remedial process for de-proposal to be achieved.

Community Involvement and Outreach Plan

In November 2015, the DEA submitted its Capital City Plume Community Involvement and Outreach Plan (CIOP) to ADEM for review. The purpose of this CIOP was to serve as a guide for providing meaningful community involvement for efforts related to the Capital City Plume project. The CIOP also provided guidance for the formation of the Community Outreach Group (COG), which is a group of concerned citizens who live or work in the downtown area that provides external review and insight into the DEAP activities and documents. The DEA routinely provides the COG with updates on major milestones with the project. The CIOP also provided guidance for the DEAP's website, which contains updates on the status of the DEAP and final documents for the public to review. ADEM submitted its concurrence letter for the plan in February 2016.

Technical Work Plan

In May 2016, The DEA finalized the Technical Work Plan (TWP), which included a summary and evaluation of all known historical environmental sampling data (groundwater, surface water, soil, soil vapor, and indoor air) in the downtown area to identify the additional field work recommended to evaluate the DEAP. Additional proposed work included installation of an additional monitoring well, collection of groundwater samples, collection of soil vapor samples, a hydraulic study of Cypress Creek and evaluation of a private commercial well, all following typical CERCLA investigation approaches.

The TWP also included a site-wide Sampling and Analysis Plan (SAP) that established the sampling methodology, laboratory methods, and field documentation requirements for the above-mentioned field work. The work elements described in the TWP were later reported in the Supplemental Environmental Investigation Report.

Supplemental Environmental Investigation Report

From summer 2016 to winter 2017, the DEA conducted the field activities associated with the Supplemental Environmental Investigation (EI), which were prescribed in the TWP and SAP. The final Supplemental EI Report was submitted to ADEM in October 2017 and concurrence was received in March 2018. The objectives of the EI (which is equivalent to a CERCLA Remedial Investigation Report)

were to collect sufficient data to support the refinement of the conceptual site model (CSM), including the following:

- Assess the nature and extent of PCE in groundwater.
- Evaluate the potential for groundwater to impact surface water in Cypress Creek.
- Evaluate the vapor intrusion potential at the County Annex III and Attorney General buildings.
- Identify concentrations of soil vapor at locations where shallow groundwater concentrations exceeded EPA residential vapor intrusion screening levels (VISLs).
- Provide sufficient data to evaluate potential exposure risk.

Based on the results of the EI phase of the project, PCE and trichloroethylene (TCE) were the only chemicals in groundwater that exceeded the lower of the maximum contaminant levels (MCLs) and EPA Regional Screening Levels (RSLs). The extent of the PCE in groundwater was delineated (horizontally and vertically) based on PCE concentrations exceeding the MCL of 5 micrograms per liter. TCE did not exceed the MCL, but was present in concentrations exceeding the RSL in isolated areas within the site. The lateral extent of PCE in groundwater ends near Cypress Creek, where the influence of the Alabama River acts as a hydraulic barrier to impede further lateral migration.

The preliminary screening evaluation resulted in the need to perform a risk assessment and alternatives analysis for the shallow groundwater and shallow soil vapor in accordance with ADEM and EPA guidance.

Risk Assessment/Alternatives Analysis Report

Based on the recommendations of the preliminary risk evaluation in the final Supplemental EI Report, the DEA prepared a combined risk assessment and alternatives analysis (i.e., equivalent of a Risk Assessment and Feasibility Study) document. The final Risk Assessment/Alternatives Analysis (RA/AA) Report was submitted to ADEM in February 2019, and ADEM concurrence was received in March 2019. The Human Health Risk Assessment (HHRA) was performed using Alabama Risk-Based Corrective Action (ARBCA) Guidance (which provides an approach and risk estimates similar to a Superfund HHRA under CERCLA) and consisted of the 4-step process identified for a Superfund HHRA.

- Step 1 - Screened maximum detected site concentrations in groundwater and soil vapor with conservative screening levels (RSLs and VISLs based on a target risk of 1×10^{-6} and target hazard quotient of 0.1) to identify chemicals of concern (COCs)¹.
- Step 2 - Developed a site-specific conceptual exposure model, identifying potential current/future receptors and potential exposure scenarios, and estimated intakes for potentially complete exposure pathways using EPA's standard exposure equations and exposure factor values.
- Step 3 - Identified toxicity values from EPA's hierarchy of toxicity value sources.
- Step 4 - Calculated risk estimates for COCs and compared risk estimates to acceptable risk levels (for ADEM, an excess lifetime cancer risk of 1×10^{-5} and hazard index of 1).

In addition, a Screening Level Ecological Risk Assessment was prepared.

The HHRA indicates that soil vapor concentrations exceed EPA's residential and/or commercial VISLs at only three locations, and that soil vapor at two of the locations was not related to the groundwater plume. Currently, there are no residences in the areas of the exceedances. The only area of a

¹ The term "chemical of concern" (COC) is used in this step in ARBCA, rather than the Superfund HHRA term "chemical of potential concern" (COPC).

commercial exceedance (unrelated to the groundwater plume) is an existing parking lot/city right-of-way; thus, there are no current receptors. Soil vapor samples collected at the building nearest the area of commercial exceedance were within acceptable limits.

The Alternatives Analysis followed the CERCLA-like decision-making process, where potential remedial alternatives were screened against the two CERCLA threshold criteria and the five balancing criteria. While several active remedial alternatives were considered (i.e., pump-and-treat, in situ chemical reduction, in situ chemical oxidation, air sparge/soil vapor extraction, and/or enhanced bioremediation), these alternatives were deemed not feasible based on their ability to be implemented, technical effectiveness, and safety considerations. Also, based on the fact that considerable active remediation has already occurred at the site (i.e., North Well Field Abandonment, 1993 Soil source Removal during RSA construction, phytoremediation project, and abandonment of privately-owned bus washing well), the Alternatives Analysis concluded that further active remediation was not warranted for the DEAP.

Four potential remedial alternatives were carried forward to the final evaluation:

- Alternative 1 - No Action
- Alternative 2 - Institutional Controls (ICs) with Five-Year Reviews (FYRs)
- Alternative 3 - ICs with FYRs and Monitoring
- Alternative 4 - ICs with FYRs and Monitored Natural Attenuation (MNA)

Based on the review of this evaluation, it was determined that Alternative 1 (No Action) would not meet the threshold criteria of being protective of human health and the environment or compliant with applicable, relevant, and appropriate requirements (ARARs). Of the three remaining alternatives, it was concluded that no additional protectiveness is gained from the increased costs associated with Alternative 4 (which includes MNA; also, the aerobic state of the aquifer will not support MNA), and although Alternative 2 (ICs with FYRs) is less expensive, it does not provide the monitoring data required to support the FYR evaluation and address when the remedy can be terminated. Areas of remaining potential risk can be managed using ICs with monitoring. Therefore, Alternative 3 (ICs with FYRs and Monitoring) was the recommended alternative.

Institutional Controls Plan

After ADEM concurrence was received for the RA/AA Report on March 8, 2019, the DEA prepared an Institutional Controls Plan (ICP), which is equivalent to a Proposed Plan/Record of Decision. The Final ICP was submitted to ADEM in July 2019. ADEM concurrence with the ICP was received in August 2019 and a final Determination Letter was received in September 2019, once the 45-day public comment period was completed with no public comments received. The purpose of the ICP was to provide the planning-level details of the ICs that would be required for the DEAP. The ICP describes the following activities to be completed for the remedy to be considered completely implemented:

- Install one additional monitoring well located along the western edge of the plume footprint.
- Amend the City's well drilling ordinance to (1) prohibit groundwater use within the downtown area, (2) prohibit first-floor residential use for one block where soil vapor is a potential future concern, and (3) require property owners to follow the International Building Code regarding the use of vapor barriers for new construction.
- Implement environmental covenants on the City-owned property in areas where soil vapor is a potential future concern.
- Provide and encourage the use of environmental covenants to downtown property owners.

- Send IC Notification Letters to downtown property owners on an annual basis to describe the restrictions for groundwater use, the use of vapor barriers, the availability of environmental covenants, and the restriction of first-floor residential use (where applicable).
- Conduct random, annual inspections of downtown properties and interviews with property owners to ensure the ICs are being implemented and maintained in accordance with the ICP.
- Conduct annual groundwater monitoring at seven effectiveness monitoring wells.
- Provide annual Remedial Action Progress Reports to ADEM.

Remedial Action Report

The Remedial Action Report (RAR), the final document required by the Settlement Agreement for Site Response for de-proposal of the DEAP, was submitted by the DEA to ADEM in November 2019 and concurrence was received by ADEM in November 2019. The purpose of the RAR was to document that the items described in the ICP were completed or ready to implement. The RAR was developed in general accordance with the Remedial Action Report: Documentation for Operable Unit Completion (OSWER 9355.0-39FS; EPA, June 1992). The RAR was submitted to EPA Region 4 in November 2019 as part of ADEM's original de-proposal package for the DEAP.

Remedial Actions at the DEA Site

Several remedial actions have been performed over the history of the Capital City Plume site:

- Soil excavation of the source area at the RSA Energy Plant in 1993
- Permanent abandonment of all public supply wells associated with the North Well Field, including the final public water supply well 9W, which was the driver for the initial listing of the site
- Installation of the phytoremediation plot in 2010 and ongoing maintenance of other trees in the downtown area
- Permanent closure of the last remaining private well (the Capital Trailways bus washing well) in 2019

Based on discussions during the March 10, 2020 site visit with EPA and ADEM, the DEA has reconsidered the active remedial alternatives that were considered in the AA portion of the RA/AA Report (i.e., pump-and-treat, in situ chemical reduction, in situ chemical oxidation, air sparge/soil vapor extraction, and/or enhanced bioremediation). The in situ chemical reduction, was not considered because the ability to sustain a reductive zone in the highly aerobic aquifer is unlikely. The use of air sparge was not considered further as the physical act of stripping PCE from the aquifer would increase the likelihood of PCE vapor migration (and potentially increase the likelihood of a complete vapor intrusion pathway) for the downtown area. Two remaining active remedial alternatives (pump- and-treat and expanded phytoremediation) were evaluated after discussions with EPA and ADEM for further consideration. In order to evaluate these two remedial options, the DEA reviewed applicable information for the two alternatives, and it was determined that the cost associated with a potential pump-and-treat option would be significantly greater than the cost associated with an expanded phytoremediation option. It was also considered that the pump-and-treat option would involve pumping contaminated groundwater to the surface, thus creating a potential pathway for exposure that does not currently exist. Furthermore, based on general knowledge of the hydrology of the area and these remediation alternatives, it is believed that neither pump-and-treat nor expanded phytoremediation technology are expected to speed up the remediation to less than MCLs within a substantially shorter timeframe.

Conclusion

The final selected remedy for the DEAP is ICs with groundwater monitoring (which is consistent with the original 2004 draft ROD prepared by EPA). Given the restrictions on groundwater use and that downtown groundwater is not needed for potable use, the DEA and ADEM understand the length of time it will take for restoration of the aquifer for drinking water standards. Additionally, there are no other foreseeable beneficial uses for this aquifer at this time. The DEAP will continue to be managed by the DEA under the regulatory authority of the Alabama Department of Environmental Management. ADEM will continue to be the lead agency responsible for regulatory oversight of the site. ADEM believes that Superfund involvement at this site is not warranted and in a letter to EPA dated November 13, 2019, requested that the site be de-proposed from the proposed NPL.

Attachment
Relevant Historical Reports and
Documents (on CD)

- 1993 RSA Building Site Evaluation
- 1996 ADEM Preliminary Assessment Report
- 2002 Black & Veatch RI Report
- 2002 Consent Order between the City and EPA
- 2003 Malcolm Pirnie Feasibility Study
- 2004 ATDSR Public Health Assessment
- 2004 Draft Record of Decision
- 2012 USGS Determination of the Potential Source Areas, Contamination Pathways, and Potable Release History of Chlorinated-Solvent-Contaminated Groundwater at the Capital City Plume Site
- 2014 Environmental Action Plan
- 2015 Community Involvement and Outreach Plan
- 2016 Technical Work Plan (historical database tables included in Section 3)
- 2017 Supplemental EI Report
- 2019 RA/AA Report
- 2019 ICP
- 2019 RAR
- October 2019 Settlement Agreement for Site Response
- Responses to Comments; EPA De-proposal Comments dated December 23, 2019