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October 4, 2016

Ms. Julie Ange
Senior Environmental Engineering Specialist
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110-2400

Subject: Request for Elimination of Soil Vapor Sampling Locations from Montgomery Downtown Environmental Assessment Project's Technical Work Plan

Dear Ms. Ange:

Thank you for meeting with the representatives of the Downtown Environmental Alliance (DEA) on September 19, 2016, during the soil vapor sampling for the Montgomery Downtown Environmental Project (DEAP). We also appreciate Steve Cobb's willingness to meet with us and confer by telephone to discuss utility conflicts and physical obstacles observed while performing the soil vapor sampling near the County Annex III Building and the Attorney General's Building. As discussed with ADEM last week, three locations that were included in the approved Technical Work Plan could not be sampled for the following reasons:

- **County Annex III Building South Sample Location** – Review of this location revealed that there are multiple underground utilities (including water, electrical, natural gas, and an unmarked storm sewer) that prevent this location from being sampled. The DEA attempted to identify a sampling location between the south wall of the building and the concrete retaining wall on the southern property line, but there is insufficient space for the direct-push rig to access an alternative location. Therefore, it was mutually agreed by the DEA and ADEM that this sampling location would be eliminated, as there is no reasonable alternative sampling location for the south side of the County Annex III Building.
- **County Annex III Building East Sample Location** – Review of this location revealed that there is no access to an external, ground-level location on the east side of the building because it is directly above a basement lobby. Further reconnaissance of the building revealed that there is no other location on the east side of the building where sampling could be safely performed. The only location that might have provided a ground-level access point is adjacent to a room marked with a high-voltage electrical sign. Therefore, it was mutually agreed upon by the DEA and ADEM that this sampling location would be eliminated, as there is no reasonable alternative sampling location for the east side of the County Annex III Building.
- **Attorney General's Building West Sample Location** – Initially, two attempts to take samples on the west side of the Attorney General's Building failed because of a concrete obstruction that was not initially marked by GPRS, the private utility locating company retained for the sampling event. On September 21, 2016, GPRS returned to the site and surveyed the area west of the building. This survey revealed that multiple underground utilities (including multiple electrical lines, a telecommunications line, and storm sewers) prevented this location from being sampled. GPRS

indicated that attempting to sample in this area was dangerous because of the presence of underground power lines. Therefore, it was mutually agreed upon by the DEA and ADEM that this location would be eliminated, as there is no reasonable alternative sampling location for the west side of the Attorney General's Building.

Prior to beginning the sampling event, CH2M called 811 to identify the location of public utilities and hired GPRS to locate subsurface utilities onsite at the County Annex III Building and the Attorney General's Building. We were unable to identify any reasonable sampling locations that would not be duplicative of samples collected at other locations near the buildings.

The omitted sample locations are located approximately ¼-mile upgradient of the Retirement Systems of Alabama (RSA) Energy Plant, which is considered a potential source of the dissolved solvents at the DEAP. Although the results of the soil vapor sampling event will be reviewed to evaluate next steps in the DEA's investigation, the DEA believes that soil vapor samples collected from the County Annex III Building (from the north and west sides of the building and two from the vapor intrusion monitoring system wells) and the Attorney General's Building (from the north and east sides of the northern wing of the building) will provide sufficient data to fulfill the objectives of the Technical Work Plan. Therefore, we request that ADEM approve the elimination of these sampling locations (shown on Figure 1) that were proposed in the Technical Work Plan. If you have any questions regarding this letter, please contact me at 334.215.9016, gdavis3@ch2m.com, or J.P. Martin at 334.215.9036, j.p.martin@ch2m.com.

Sincerely,

CH2M



Glen S. Davis

c: Steve Cobb/ADEM
Downtown Alliance Members w/enclosure

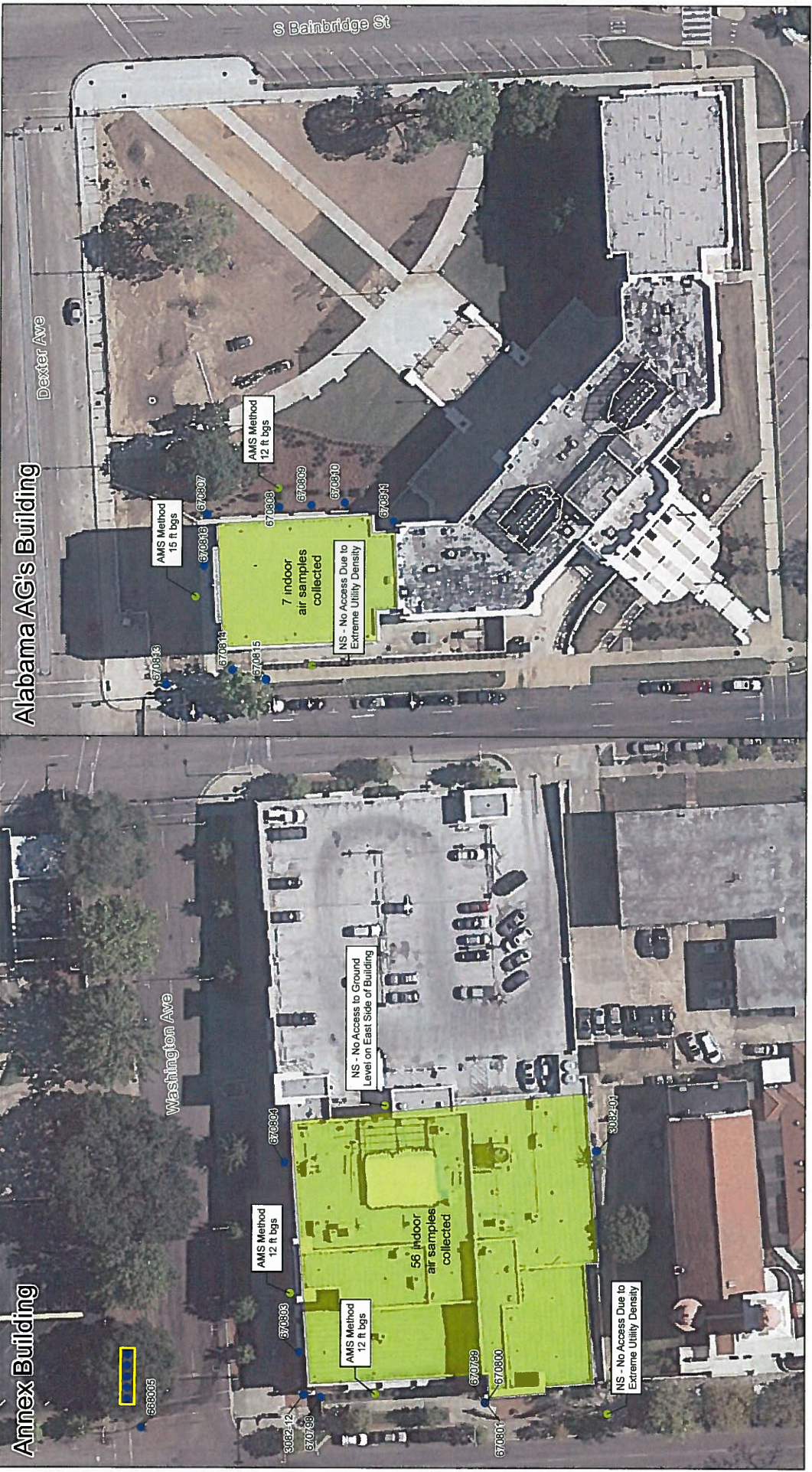


FIGURE 1
 County Annex III and Alabama AG's Buildings
 Proposed Soil Vapor Sampling Locations
 Downtown Environmental Assessment Project
 Montgomery, AL

LEGEND

- Proposed Soil Vapor Sample Location
- Historical Soil Vapor Sample Location
- Vapor Intrusion Monitoring System

Notes:

1. AG - Attorney General
2. Soil vapor locations are approximate where text description were provided in lieu of coordinates.
3. All indoor air samples were collected within the building under the areas shaded in green.
4. ft bgs - feet below ground surface
5. NS - not sampled

