

LANCE R. LEFLEUR  
DIRECTOR



KAY IVEY  
GOVERNOR

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

July 27, 2017

91 7199 9991 7037 0387 9088

CERTIFIED MAIL#

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

**RE: ADEM Review and Comments:** *Supplemental Environmental Investigation Report – Downtown Environmental Assessment Project*; dated April 2017.  
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) *Supplemental Environmental Investigation Report – Downtown Environmental Assessment Project*. ADEM 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 Samantha Downing of the Engineering Remediation Section at 334-270-5687 or via email at [rsdowning@adem.alabama.gov](mailto:rsdowning@adem.alabama.gov).

Sincerely,

Ashley T. Mastin, Chief  
Remediation Engineering Section  
Governmental Hazardous Waste Branch  
Land Division

ATM/RSD/akr

cc: J.P. Martin/CH2M  
Ashley Cousins/AC ESS, LLC

Birmingham Branch  
110 Vulcan Road  
Birmingham, AL 35209-4702  
(205) 942-6168  
(205) 941-1603 (FAX)

Decatur Branch  
2715 Sandlin Road, S.W.  
Decatur, AL 35603-1333  
(256) 353-1713  
(256) 340-9359 (FAX)



Mobile Branch  
2204 Perimeter Road  
Mobile, AL 36615-1131  
(251) 450-3400  
(251) 479-2593 (FAX)

Mobile-Coastal  
3664 Dauphin Street, Suite B  
Mobile, AL 36608  
(251) 304-1176  
(251) 304-1189 (FAX)

**ATTACHMENT**  
**ADEM Review Comments**  
***Supplemental Environmental Investigation Report –***  
***Downtown Environmental Assessment Project***  
**Montgomery, Alabama**

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1. **Section 5.1:** According to this section, soils at the Retirement Systems of Alabama (RSA) Energy Plant were identified as impacted during construction activities in 1993. Please detail any plans to identify additional historical release points or potential ongoing sources other than the impacted soils identified at the RSA Energy Plant in the revised report.
2. **Table 3-1:** According to the January 2016 work plan, monitoring well TMPZ-1 was to be installed so that the well's screened interval would intersect the groundwater table. From Table 3-1, TMPZ-1 was installed to a total depth of 48 feet below ground surface (ft bgs) with a screened interval from 37.5 ft bgs to 47 ft bgs. The soil boring logs located in Appendix A of this report document the depth to groundwater at the time of drilling as 28 ft bgs. Please provide reasoning in the revised report for not installing monitoring well TMPZ-1 as indicated in the January 2016 work plan.
3. **Table 3-1:** Construction details for all monitoring wells and the temporary piezometer TMPZ-1 were provided in Table 3-1 of the report; however, public well PW-09W and the commercial bus washing station well details were not provided. It is recommended that the well construction details for PW-09W and the commercial bus washing station well be obtained in order to compare to nearby monitoring wells. This information is relevant to the forthcoming risk assessment as the location and continued use of the bus washing station well makes it a point of exposure for inhalation, dermal contact and possible ingestion pathways for current and future use by a commercial worker. Furthermore, there is the potential for this well to be a conduit for vertical contaminant migration by inducing a downward hydraulic gradient when pumped. Please provide the well construction details for the public well PW-09W and the commercial bus washing station well in the revised report.
4. **Table 4-1:** A comparison of the Alabama River and Cypress Creek surface elevations to groundwater elevations in the monitor wells indicates that both surface water features are gaining streams that are in direct communication with the groundwater and are located hydraulically downgradient of the contaminant plume. Due to the groundwater gradient and the contaminant concentrations in TMPZ-1, Cypress Creek and the Alabama River appear to be potential points of exposure to contaminated groundwater. Please provide further information to determine the potential impacts to surface water.
5. **Table 4-2:** Please provide historical groundwater sampling data tables for the chemicals of concern in the revised report.

6. **Figure ES-3:** The Department recommends that groundwater samples be collected from the former public supply well PW-09W, which was retained for environmental sampling. Including current sampling data from this location will aid in determining the vertical extent of the plume in the northern portion of this site. Please address in the revised report.
7. **Figure ES-3:** From the information provided in this report, it is the Department's understanding that the area surrounding well PW-09W is still impacted. The Department requests reasoning for not including groundwater in the vicinity of former public supply well PW-09W in the northernmost tetrachloroethene (PCE) plume boundary as depicted in Figure ES-3, Figure 4-2, and Figure 5-2. Please address in the revised report.
8. **Figure 5-2:** This figure includes grab sample locations taken in 2003 to determine plume extent. Please include data from the 2003 grab samples in the revised report.