

Fw: Capitol: FOIA Documents/site CSM

Stephen Smith to: Debbie Jourdan

07/09/2012 09:57 AM

By the way, these attachments are already in SDMS; however, I wasn't sure if they were necessary again due to their references in the email below.

Stephen P. Smith
U.S. Environmental Protection Agency, Region 4
Office of Environmental Accountability
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ph: (404) 562-9554
Fax: (404) 562-9486
smith.stephen@epa.gov

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----- Forwarded by Stephen Smith/R4/USEPA/US on 07/09/2012 09:55 AM -----

From: "Gengel, Gary (NJ)" <Gary.Gengel@lw.com>
To: Stephen Smith/R4/USEPA/US@EPA, Scott Miller/R4/USEPA/US@EPA
Cc: "Robert Tambling" <rtambling@ago.state.al.us>, "Alfred F. Smith Jr." <asmith@bainbridgemims.com>, "Thurlow, Matthew (DC)" <Matthew.Thurlow@lw.com>
Date: 04/03/2012 01:53 PM
Subject: Capitol: FOIA Documents/site CSM

Stephen and Scott –

Attached for your review and consideration are three EPA documents we received on March 6, 2012 in response to our July 2011 FOIA request which seem relevant to the Capitol Site CSM.

The first document, authored on 3/29/99 by Humberto Guzman, the former RPM, states “The City of Montgomery’s ground water is contaminated with tetrachloroethylene, which is suspected to come from dry cleaners, and BTEX which probably comes from gasoline stations.”

The second document is a summary of a 5/3/99 call including EPA Headquarters, and states “Region 4 stated that there are possibly six to twelve tetrachloroethylene (PCE) ground water plumes underlying the city of Montgomery, Alabama; all of which may be part of one large PCE plume and a collectively considered the Capitol City Plume site.” And further, “The highest concentrations of PCE have been detected near and on the RSA property. Consequently, RSA may be a primary source of PCE groundwater contamination.”

The third document is apparently an EPA PowerPoint provided at the June 5, 2002 Alabama Groundwater Conference. Please note the plume depictions on slides 25 – 27 which seem consistent with Geosyntec’s March 15 CSM presentation.

Further, recall that the RI Report provides at Section 7.2 Conclusions: “It is likely that site contaminants originated from multiple sources within the downtown Montgomery area.” In short, it appears EPA’s CSM is (or at least was) consistent with Geosyntec’s (and ADEM’s and the City of Montgomery’s).

We look forward to discussing the Capitol site CSM with you as soon as you are able to digest the data Geosyntec provided and the March 15 presentation.

Thanks,

Gary P. Gengel

LATHAM & WATKINS LLP

One Newark Center, 16th Floor

Newark, NJ 07101-3174

Direct Dial: +1.973.639.7287

Fax: +1.973.639.7298

Cell: +1.609.306.9835

Email: gary.gengel@lw.com

<http://www.lw.com>



FOIA720.pdf



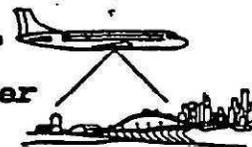
FOIA723.pdf



FOIA794.pdf



Environmental Photographic Interpretation Center
 U.S. Environmental Protection Agency
 12201 Sunrise Valley Drive
 555 National Center
 Reston, VA 22092



REMOTE SENSING SERVICES REQUEST FORM

Request Date: 3-29-99

I. SITE DATA

Site Name: Capital City Plume Region: 4

Program (circle): Superfund RCRA CWA Other _____

If Superfund: Site/Spill ID# AL0001058056

Purpose (circle): Remedial Removal Enf: Other _____

Geographic coordinates: N32°22'30" Long. W86°15' Lat. _____

State: AL County: Montgomery Municipality: _____

USGS Quad Name (IMPORTANT: ATTACH PHOTOCOPY OF MAP SHOWING SITE BOUNDARIES AND/OR STUDY AREA): Montgomery North + South, ALA

Requester: Humberto Guzman Phone# 404-562-8942 EMAIL guzman.humberto@epa.gov

Brief discussion of site history, specific problem at site, what you hope to accomplish through this request. Elaborate on known or suspected aspects of site operation (e.g., barrels believed dumped between 1967 and 1972 adjacent to north lagoon). Please attach background information about the site such as site descriptions, action memos, etc.

The City of Montgomery's ground water is contaminated with tetrachloroethylene, which is suspected to come from dry cleaners, and BTEX which probably comes from gasoline stations.

II. STANDARD REQUEST OPTIONS - Check and complete the appropriate section for the for the service you are requesting.

_____ 1. CURRENT PHOTOGRAPHY ONLY (new overflight)

a. Scale: _____ (e.g., 1:24,000); Film Type: _____

b. Special conditions (e.g., do not fly if snow cover, leaves time on, etc.) _____

Average turnaround = 6 wks.



SITE: Capital City Plume
 BREAK: 3.13
 OTHER: v. 13

- c. Photo size: 9"x9" _____ 20"x20" _____ Other _____
- d. Are stereo pairs needed? _____ Y _____ N
- e. Number of copies: _____
- f. Desired delivery date: _____

2. HISTORICAL PHOTOGRAPHY ONLY

***Average
turnaround
time =
6-10 wks.***

- a. Study period (e.g., 1936-1955): _____
- b. Specific years desired: _____
- c. Photo size: 9"x9" _____ 20"x20" _____ Other _____
- d. Number of copies: _____
- e. Desired delivery date: _____

3. ANALYSIS OF CURRENT (single coverage) PHOTOGRAPHY

***Average
turnaround
time =
8 wks***

- a. Scale: _____ (e.g., 1:24,000)
- b. Special conditions (e.g., do not fly if snow cover, leaves on, etc.) _____
- c. Photo size: 9"x9" _____ 20"x20" _____ Other _____
- d. Number of copies: _____
- e. Desired delivery date: _____

X 4. ANALYSIS OF HISTORICAL PHOTOGRAPHY (standard site analysis package - see attachment)

***Average
turnaround
time =
12-24 wks.

- a. Study period (e.g., 1936-1955): 1950 - Present
- b. Specific years of interest: 1970 - Present
- c. Are copies of historical photos (before analysis) needed? _____ Y N
If yes, photo size: 9"x9" _____ 20"x20" _____ Other _____
- d. Is an interim report (unbound format, handwritten photo overlays with typed body of report) needed? Y _____ N
- e. Number of copies of final bound report: 3
- f. Desired delivery date: 7/1/99

5. SURVEYING AND MAPPING - Complete and attach request form

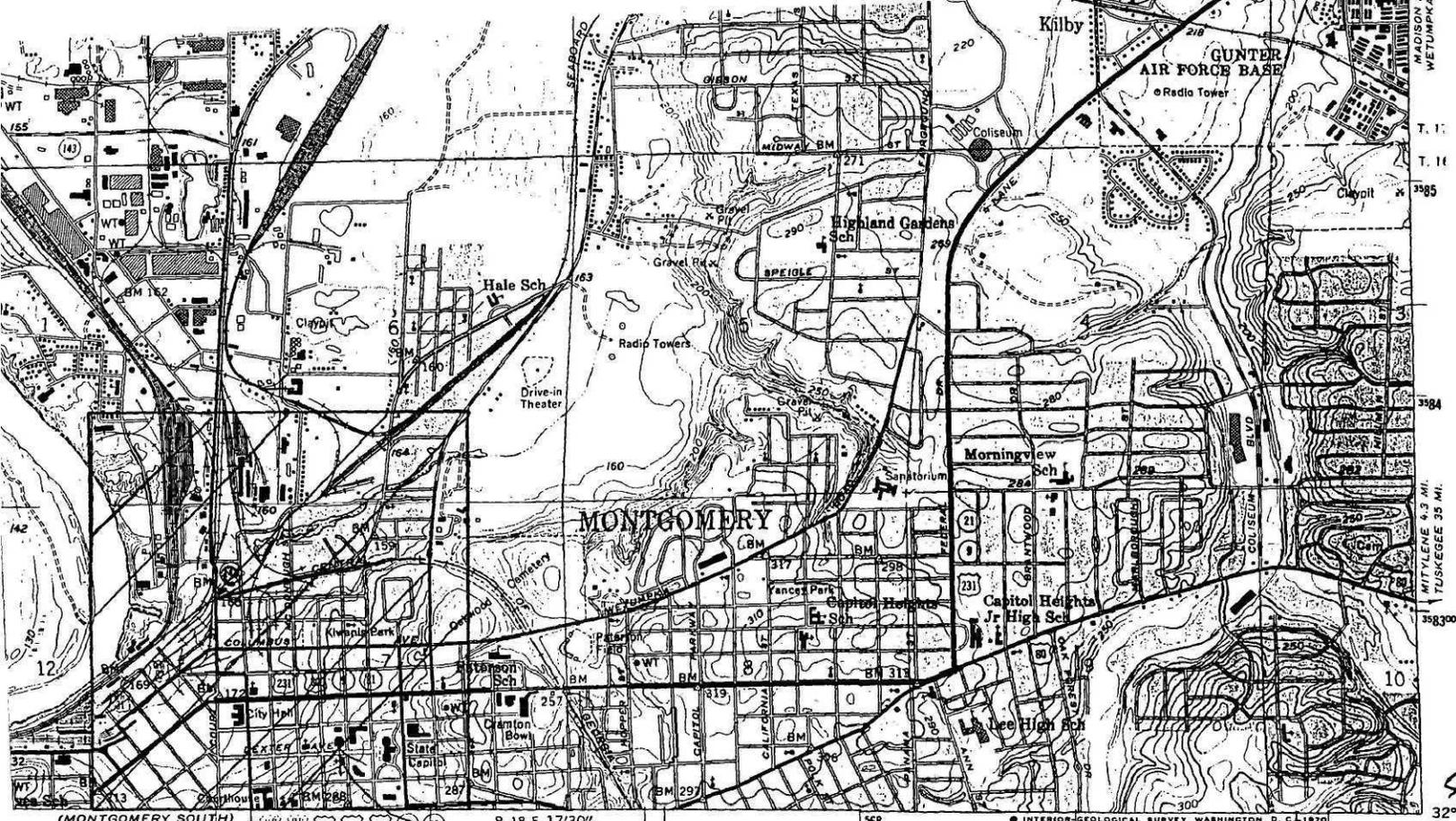
III. SPECIAL REQUEST OPTIONS - The following remote sensing services are also available for sites with conditions that warrant their use. Check off items of interest and contact your remote sensing coordinator for more information.

- a. Land use analysis (within specified distance from site)
- b. Fracture trace analysis
- c. Wetland mapping/assessment
- d. Multi-spectral scanner overflights
- e. Thermal infrared scanner overflights
- f. Mensuration (measurements) of features (e.g., barrel/drum count, terrain transects, building dimensions, lagoon dimensions, etc.)
- g. Satellite Data (digital)
- h. Satellite Data (Hardcopy)
- i. Digital Elevation Model

Your request with attached site or area map(s) may be faxed to the following:

Region 1-5 requests: 703-648-4290
ATTN: Joan Bozik

Region 6-10 requests: 702-798-2692
ATTN: Phil Arberg



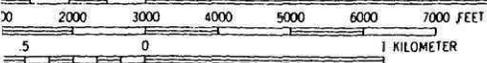
(MONTGOMERY SOUTH)
3768 IV SE

SCALE 1:24 000

1.6 MI. TO JUNG. U.S. 80
3.7 MI. TO JUNG. U.S. 82 AND 231

R. 18 E. 17'30"

Area of Interest



CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL

PLIES WITH NATIONAL MAP ACCURACY STANDARDS
GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
POGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

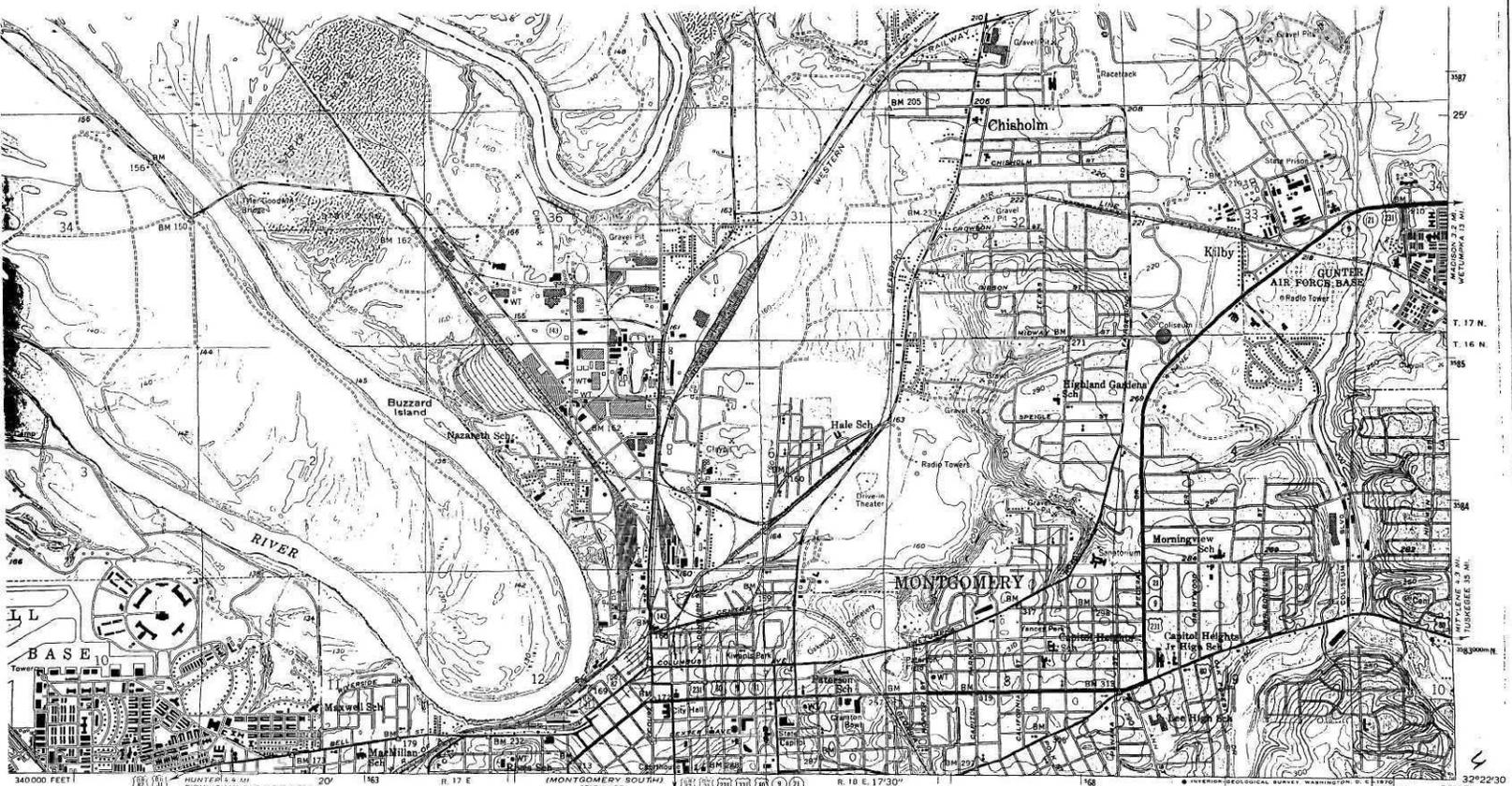


QUADRANGLE LOCATION

ROAD CLASSIFICATION

- Heavy-duty _____
- Light-duty _____
- Medium-duty _____
- Unimproved dirt _____
- U. S. Route
- State Route

MONTGOMERY NORTH, ALA.
NE/4 MONTGOMERY 15' QUADRANGLE
N 3222.5—W 8615/7.5



340000 FEET
 1:24000
 (MONTGOMERY SOUTH)
 SCALE 1:24000
 1.6 MI. TO JUNE U.S. 83
 3.3 MI. TO JUNE U.S. 82 AND 231
 1 MILE
 1 KILOMETER
 32°22'30"
 86°19'

UTM GRID AND 1986 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
 0°22' 7 MILS 33 MILS
 CONTOUR INTERVAL 10 FEET
 DATUM IS MEAN SEA LEVEL
 ROAD CLASSIFICATION
 Heavy duty ——— Light-duty ———
 Medium duty ——— Unimproved dirt ———
 U.S. Route State Route



MONTGOMERY NORTH, ALA.
 NE1/4 MONTGOMERY 15' QUADRANGLE
 N 3222.5—W 8615/7.5
 10KR

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
 FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

SITE: Capitol City Plume
BREAK: 3.1
OTHER: v. 18

TELEPHONE CONFERENCE NOTES
TECHNICAL AND ANALYTICAL SUPPORT FOR EPA's NPL

Date of Call: 05/03/99

Time: 2:00 p.m. (EST)

From: Leslie Meador, Marasco Newton Group Region 4 Coordinator
To: Barbara Vandemer, EPA HQ Region 4 Coordinator
Subject: Capitol City Plume site
Clarification of site issues

Other Participants:

- EPA HQ Steve Caldwell, Bob Myers
 - EPA Region 4 Cindy Gurley, Mario Villamarzo, Humberto Guzman
 - Marasco Newton Team: Alison Wolfe, Anita Williams
-

A conference call was convened between EPA HQ, EPA Region 4, and the Marasco Newton Team to discuss site characterization issues pertaining to the Capitol City Plume site and to clarify the scope of the Region's site remedial plans. The following issues were discussed:

- Site Characterization/Aggregation. Region 4 stated that there are possibly six to twelve tetrachloroethylene (PCE) ground water plumes underlying the city of Montgomery, Alabama; all of which may be part of one large PCE plume and are collectively considered the Capitol City Plume site. Although no ESI or equivalent has been conducted for this site, which is one of the general considerations for listing a ground water plume site with no identified source, the Region stated that additional sampling has been conducted in the area and there is the possibility that multiple sources of the PCE contamination are present in the plume vicinity. The Region intends to initiate the remedial investigation in July, 1999, and will consider the site to be one plume, which is believed to cover approximately 30 city blocks, rather than multiple plumes/multiple sites. Based on this information and because of the impact the plume has already had on two of the city's municipal wells, EPA Headquarters concurred that the Region should move ahead with its package preparation efforts.
- Source Definition. Because the plume is defined in the first submittal of the HRS documentation record as extending from the RSA Energy Plant to two of the city of Montgomery's public wells, the issue of potential sources of the contamination was discussed. The highest concentrations of PCE have been detected near and on the RSA property. Consequently, RSA may be a primary source of PCE ground water contamination. It was agreed that the State package preparer should include information regarding the RSA facility and other potential source areas in the second submission of the HRS package.



- QA Issues Resolution and Use of Additional Data. Region 4 and the State are in the process of collecting additional data which can be used to support the HRS score. It was agreed that the Marasco Newton Team will review these additional data to evaluate data quality and comparability, and to identify which samples and data sets may best be used to resolve QA issues identified in the first submittal of the HRS package. EPA Headquarters granted authorization for the Marasco Newton Team to provide additional technical direction to the State prior to completion of the second submission of the HRS documentation record. Region 4 will recommend that the State postpone revisions to the initial submission of the documentation record until the additional data have been reviewed since their inclusion in the HRS scoring strategy may result in modifications to some of the recommendations included in the initial QA letter.

EPA Headquarters expressed its concerns for resource allocation and cost recovery, site prioritization, and how to address an increasing number of "mega" sites such as the Capitol City Plume site, and requested from the Region a topographic map showing the location and extent of the individual plume locations and additional information regarding the Region's intended scope for site remediation. It also expressed its support for the Region's decision to list the Capitol City Plume site as a ground water plume and agreed with the Region regarding the importance of listing and remediating the site.

Upon receipt, the Marasco Newton Team will review the new data and provide recommendations for their inclusion in the second submission of the HRS package. EPA Headquarters requested that it be updated on progress. As more information is collected, EPA Headquarters may convene additional meetings to further discuss issues related to the listing the Capitol City Plume site on the NPL.

Author: Cindy Gurley at REGION4
Date: 5/12/99 11:06 AM
Priority: Normal
TO: Mario Villamarzo, Humberto Guzman, Curt Fehn
Subject: Capitol City Plume Conference Call Notes

The meeting notes on the Capital City Plume site is attached. I have told ADEM to hold off on revising the HRS package at this time. When we receive the additional data and MNG QAs it, then we will continue to revise the package. Also, the package will include information regarding the RSA facility.

So, at this time I am waiting on the new data. I also want to point out that this site will be greatly delayed in the listing process.

Cindy Gurley

Forward Header

Subject: Capitol City Plume Conference Call Notes
Author: lmeador@mindspring.com at IN
Date: 5/6/99 11:52 PM

Barbara and Cindy,

Attached are the conference call notes for the Capitol City Plume site. Please contact me with any questions or comments.

Thanks,
Leslie



**Capitol City Plume Site
Montgomery, Alabama**

**Presented by the
U.S. Environmental Protection Agency, Region 4**

for

**Alabama Groundwater Conference
June 5, 2002**

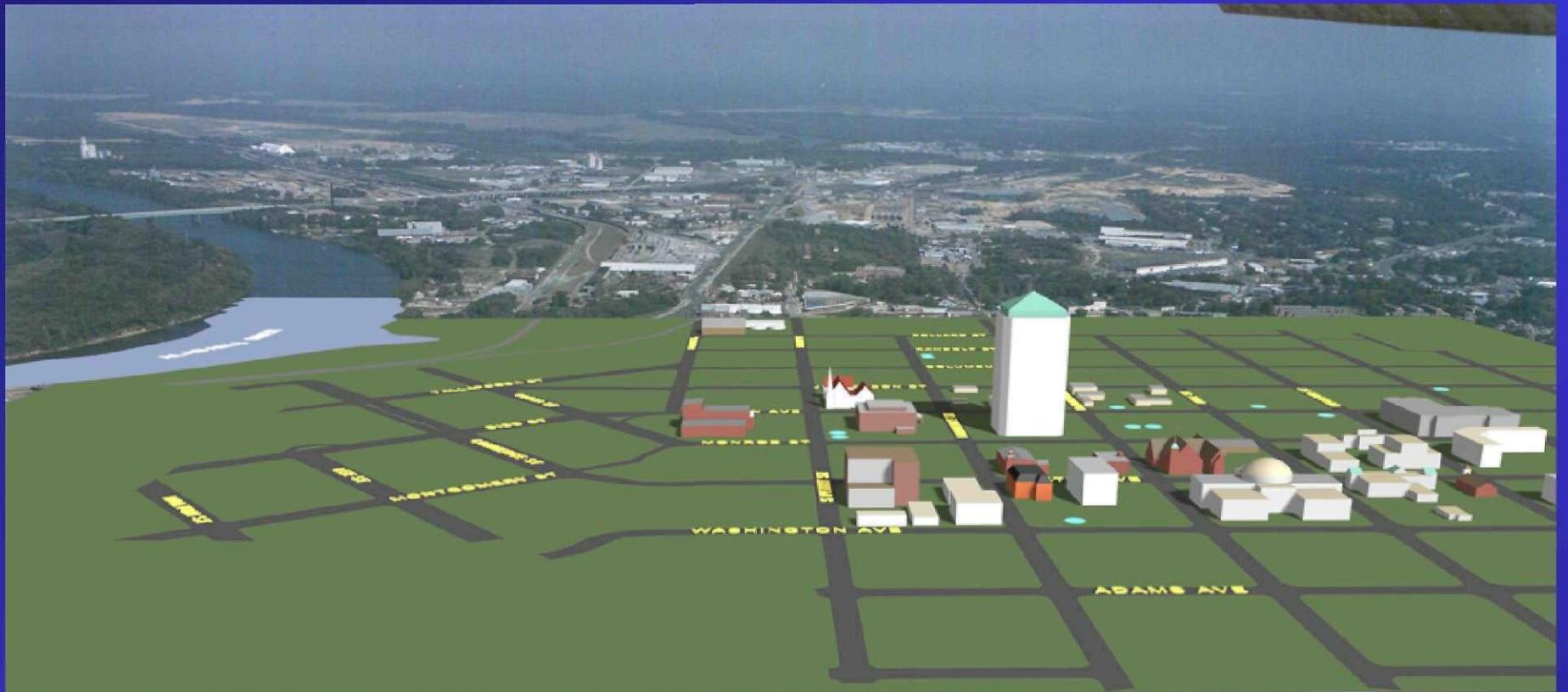


10299775

Presentation Agenda

- **Site Background Information**
- **Remedial Investigation Activities and Results**
- **Questions and Answers**





CAPITOL CITY PLUME SITE
MONTGOMERY, ALABAMA

Site Background

Site Background

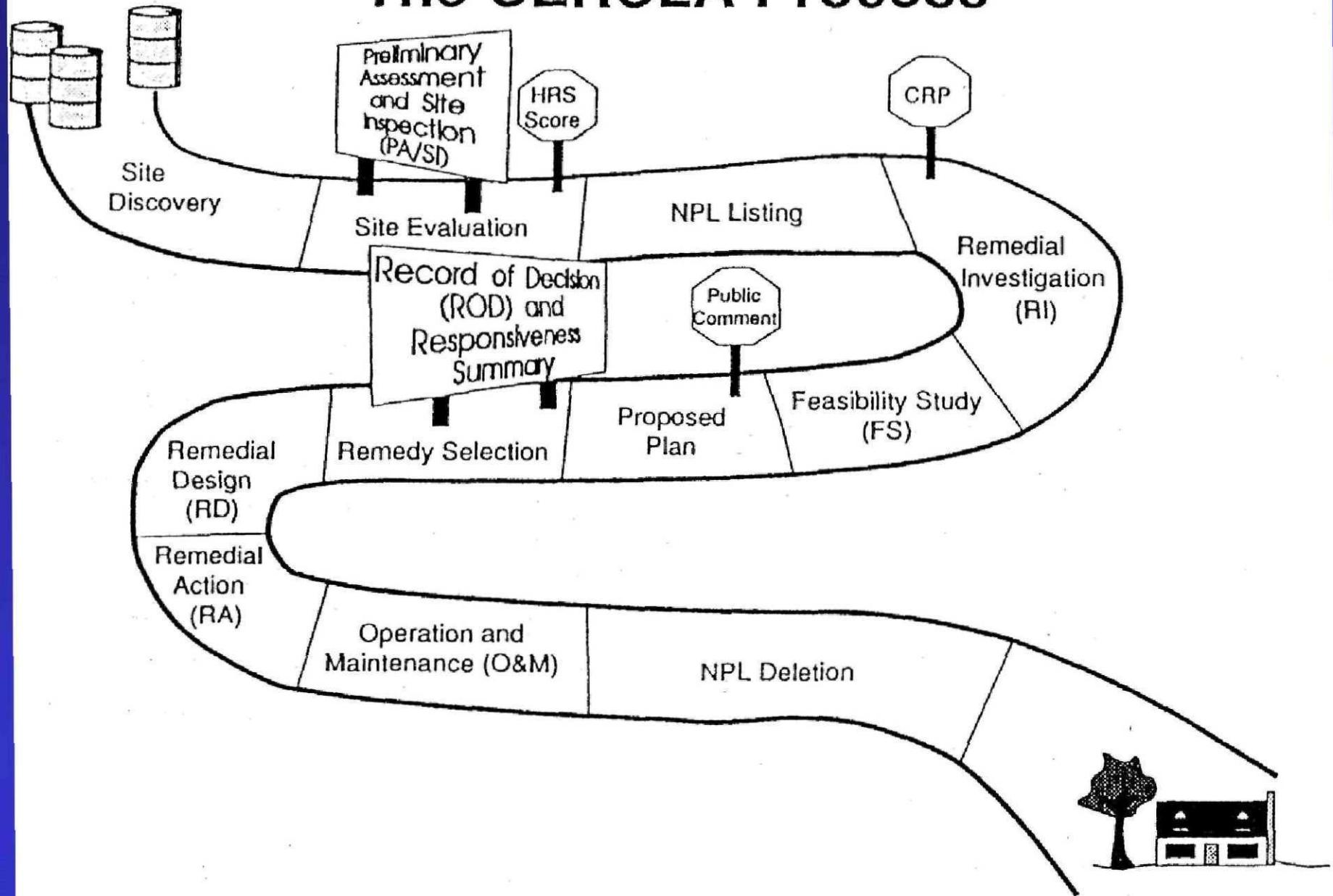
- **1993--PCE contaminated soil discovered during construction of RSA Tower**
- **1995--ADEM conducts Preliminary Assessment**
- **1996--ADEM conducts Site Investigation; concludes groundwater contaminated with PCE and BTEX compounds**

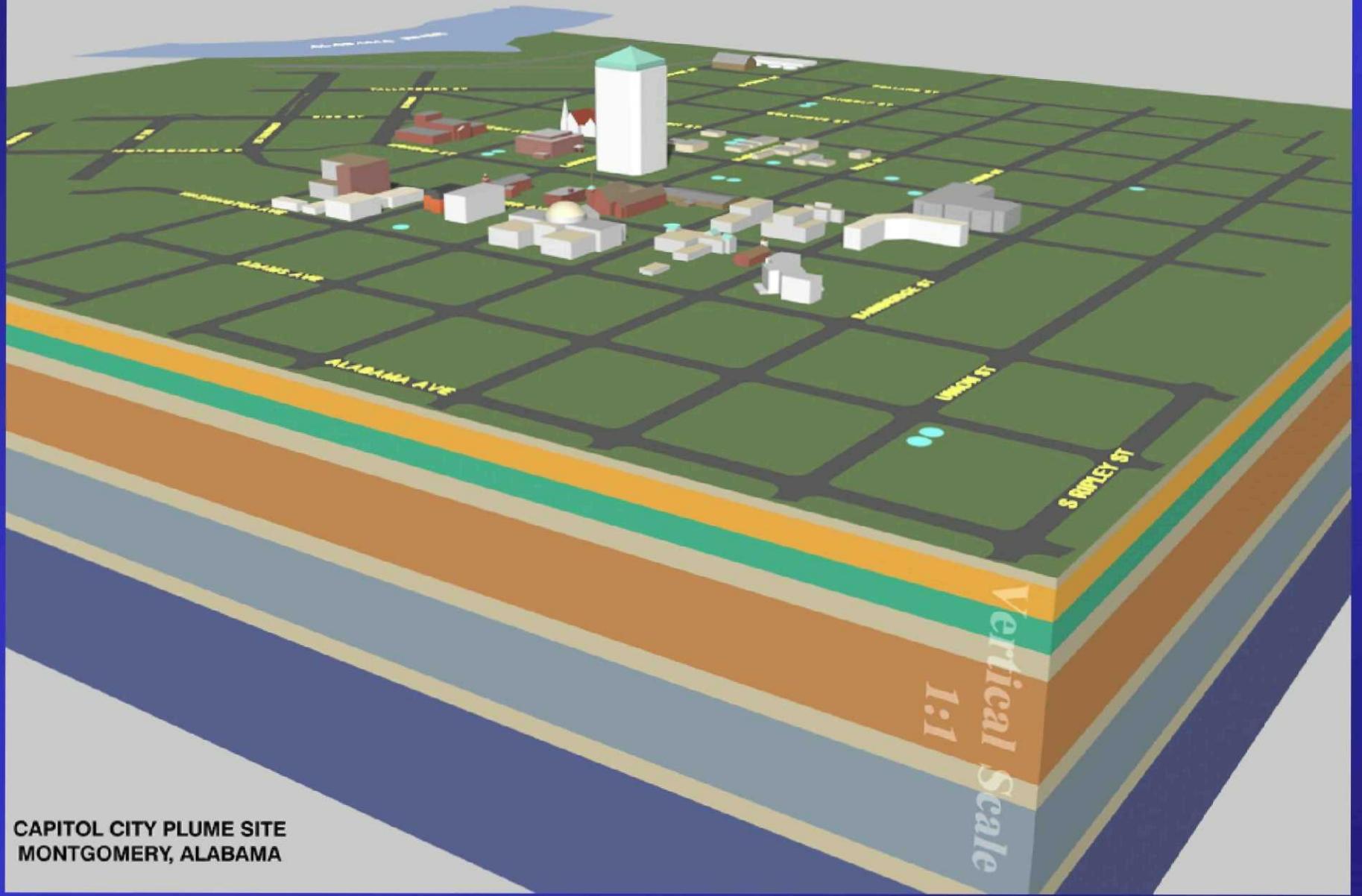
Remedial Investigation Activities and Results

CERCLA Process

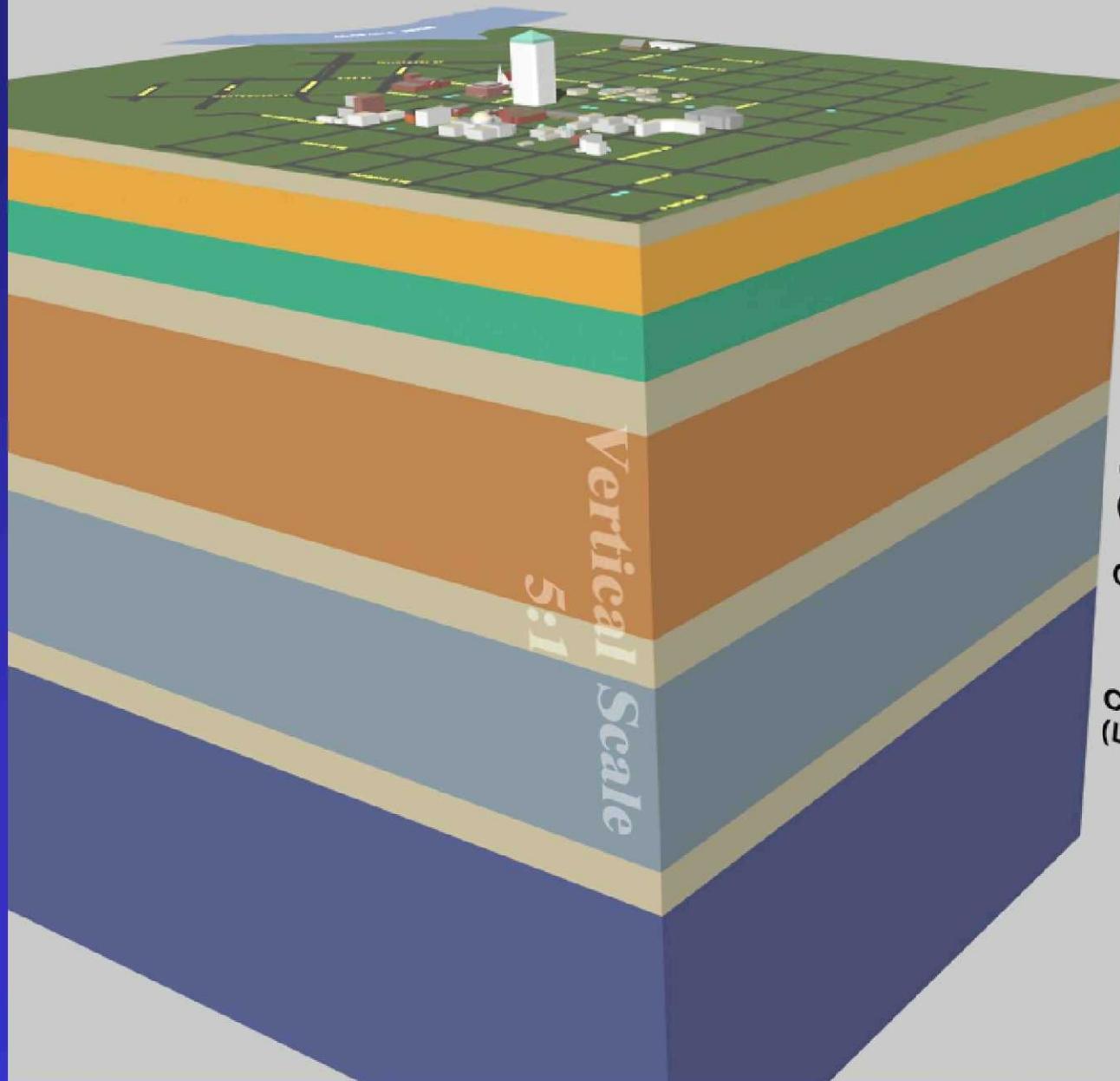
CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act--the federal law governing the Capitol City Plume site remedial investigation.

The CERCLA Process





CAPITOL CITY PLUME SITE
MONTGOMERY, ALABAMA



SANDY CLAY
TERRACE DEPOSITS
EUTAW FORMATION
CLAY

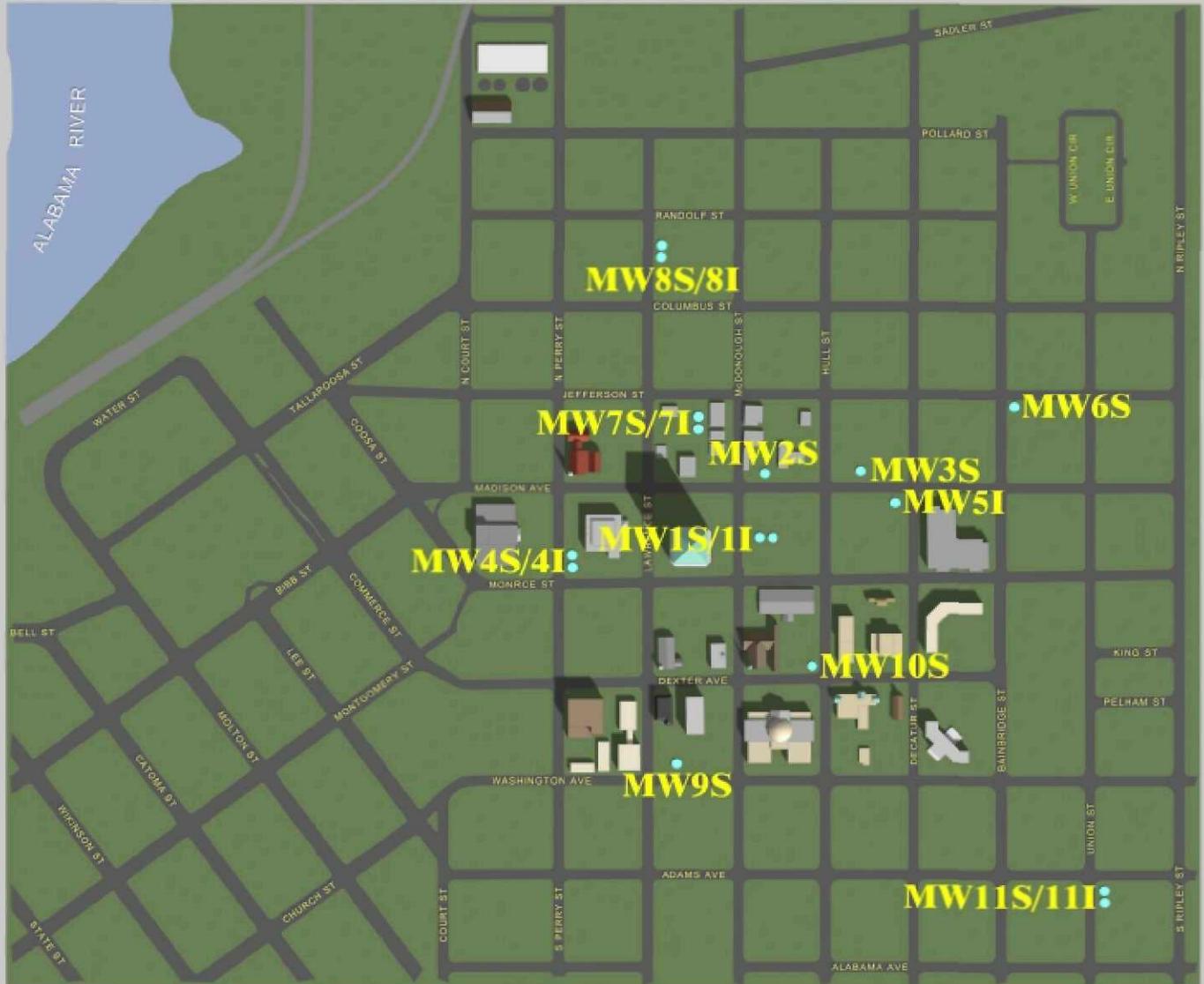
GORDO FORMATION
CLAY

COKER FORMATION
(UPPER)
CLAY

COKER FORMATION
(LOWER)

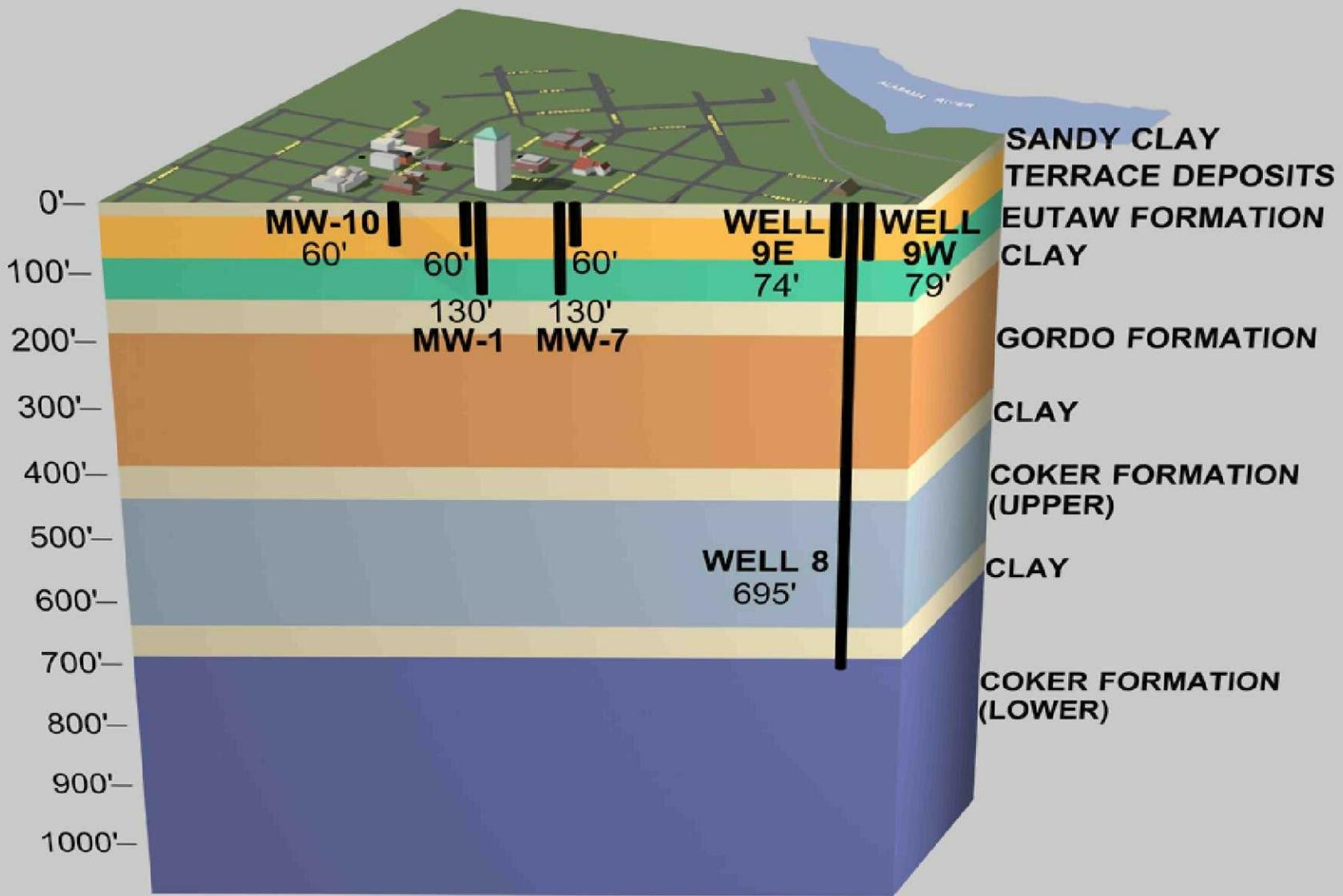
Vertical Scale
5:1

CAPITOL CITY PLUME SITE
MONTGOMERY, ALABAMA



● Permanent Monitoring Well





CAPITOL CITY PLUME SITE
MONTGOMERY, ALABAMA













MW-6S
37'-47'
3/17/00



● Temporary Monitoring Well



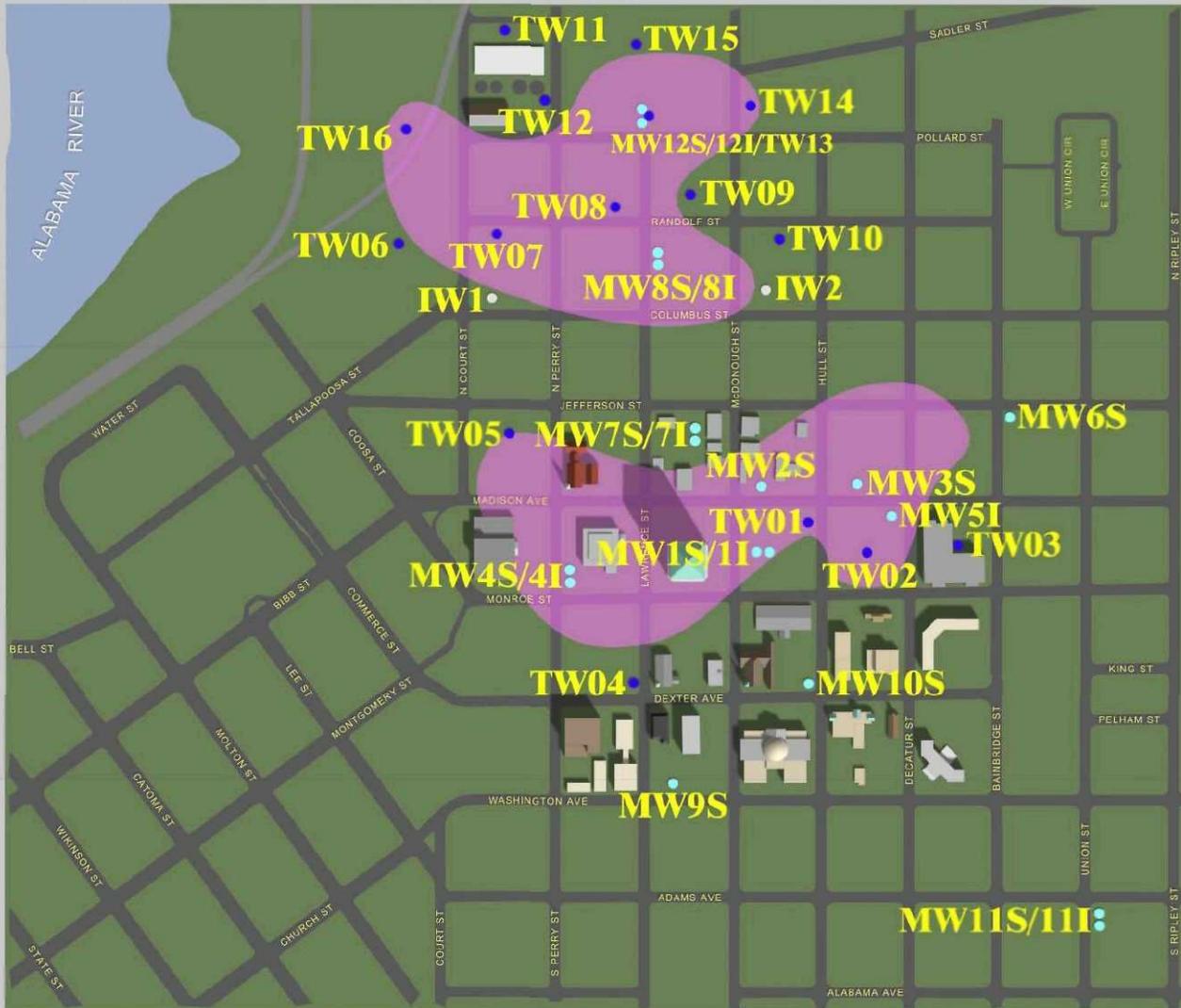




- Permanent Monitoring Well
- Temporary Monitoring Well
- Industrial Well

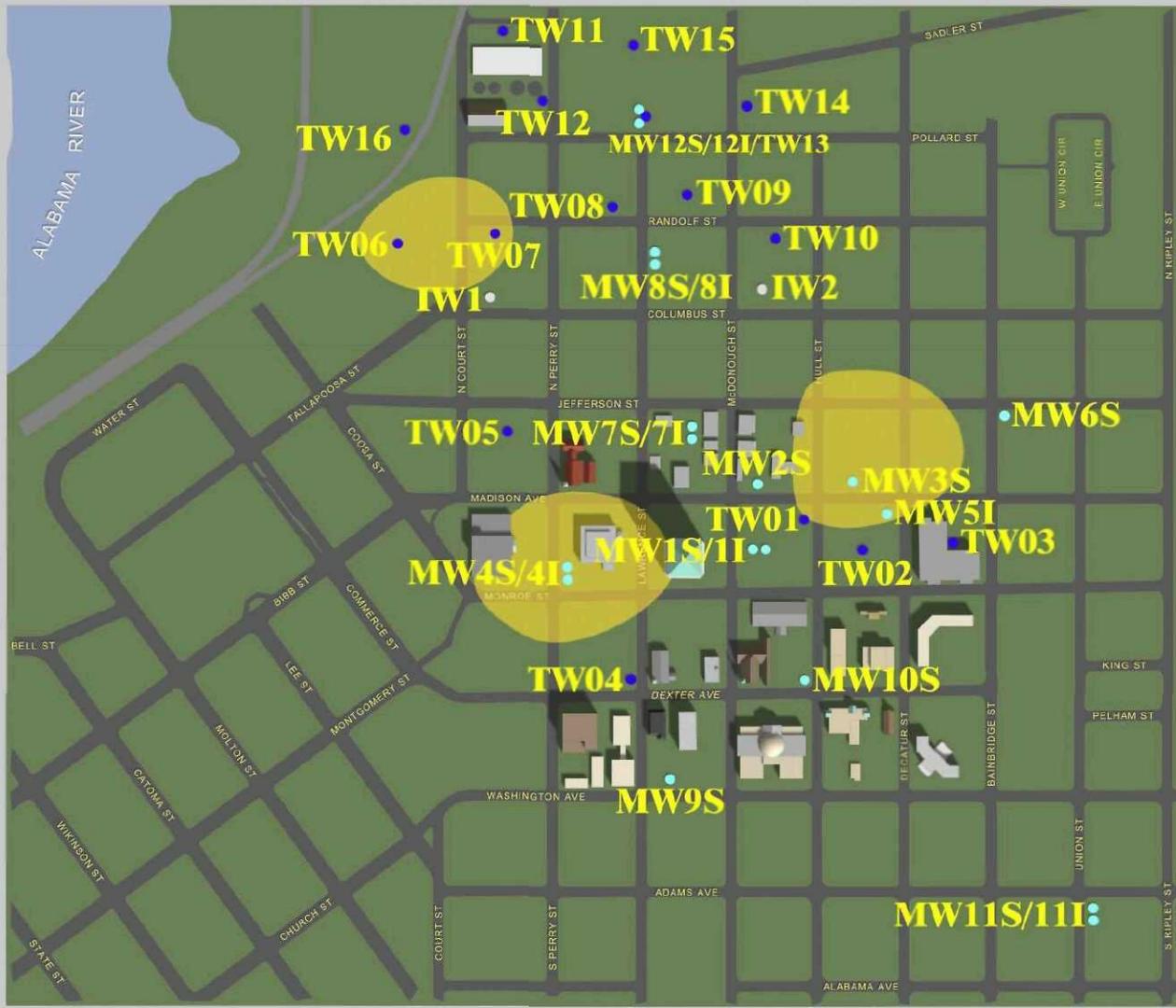


- Permanent Monitoring Well
- Temporary Monitoring Well
- Industrial Well



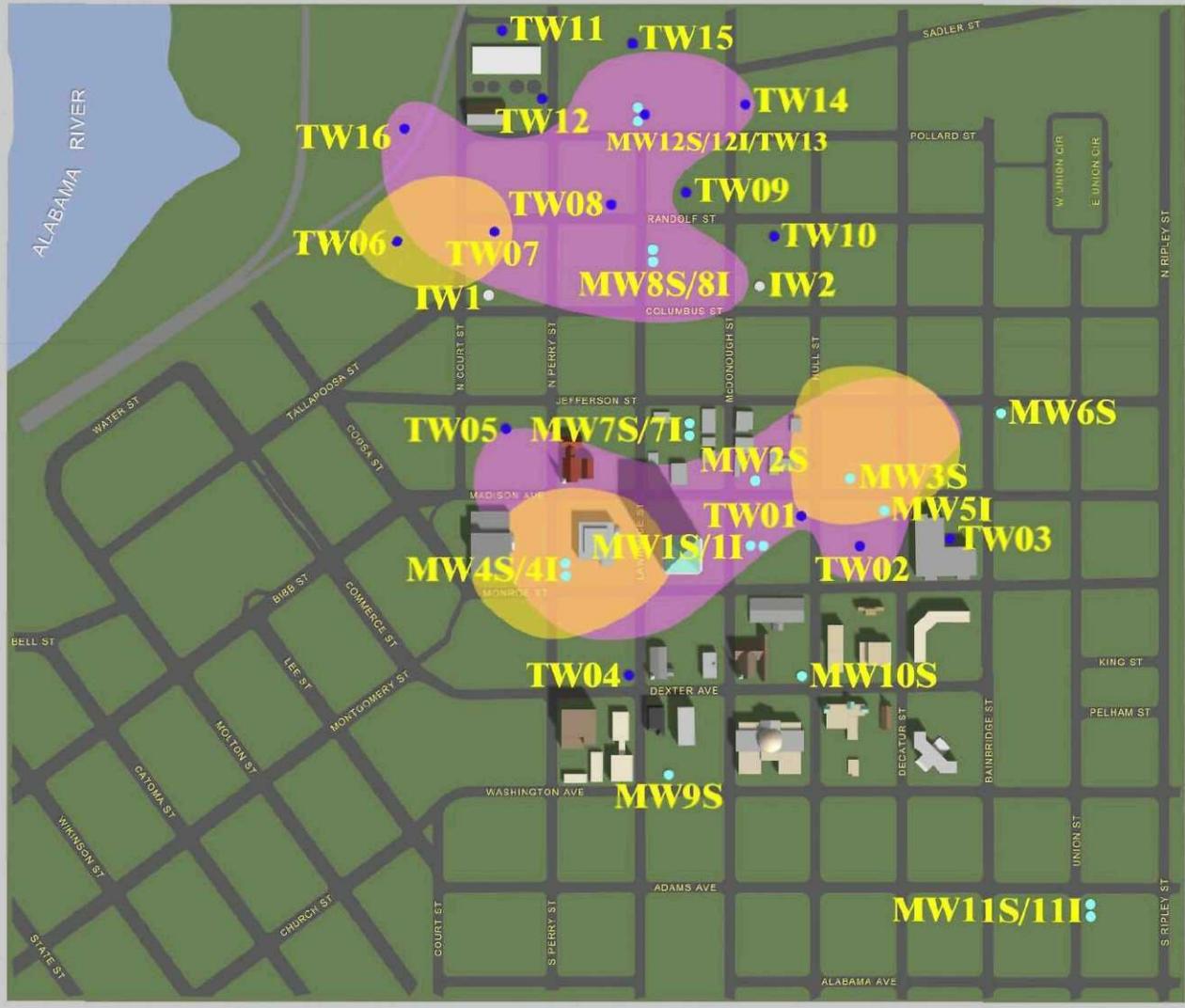
- Permanent Monitoring Well
- Temporary Monitoring Well
- Industrial Well

$\geq 5 \text{ ug/L PCE MCL}$



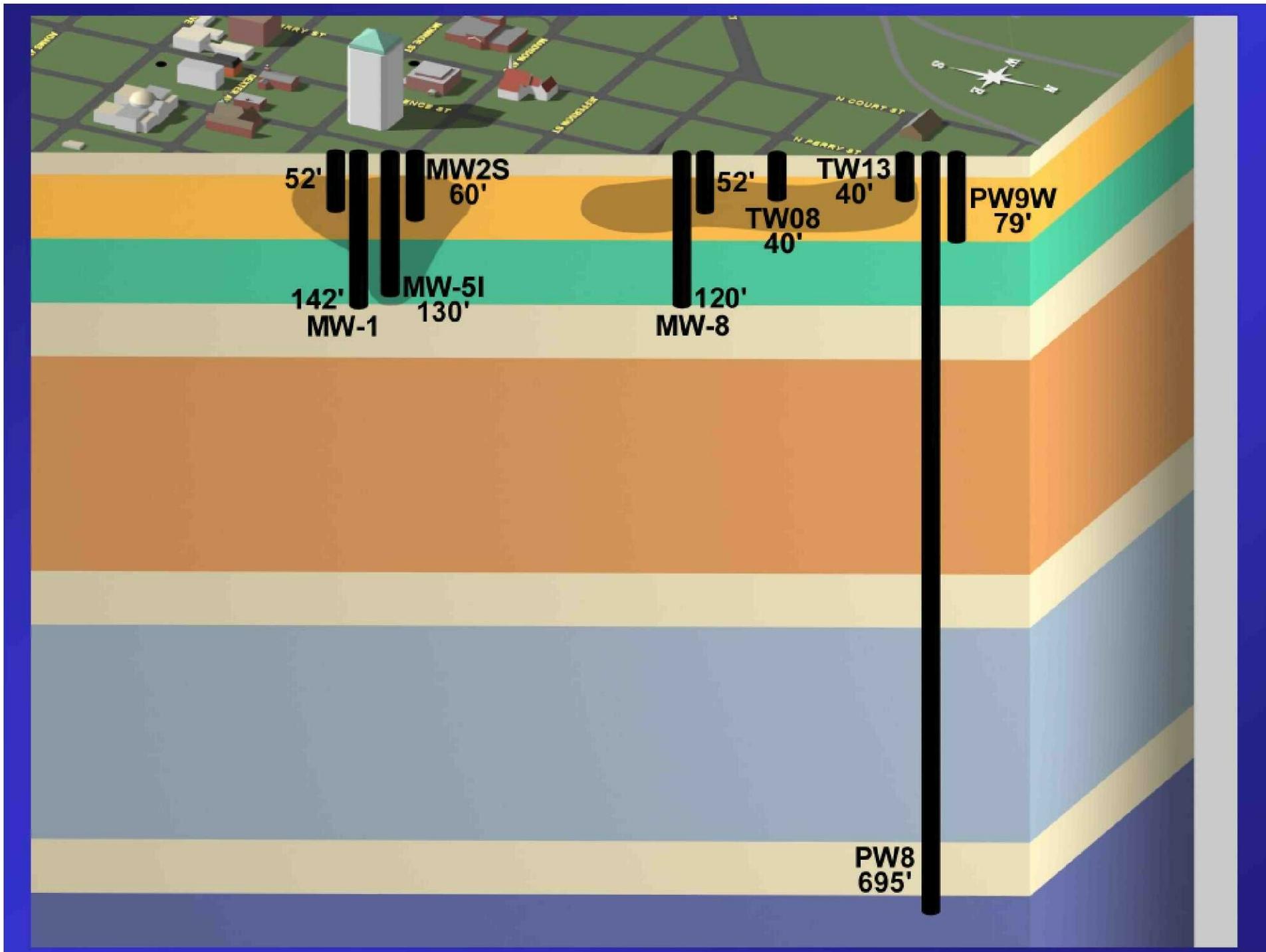
- Permanent Monitoring Well
- Temporary Monitoring Well
- Industrial Well

≥ 5 ug/L TCE MCL



● Permanent Monitoring Well
● Temporary Monitoring Well
● Industrial Well

≥ 5 ug/L TCE MCL
 ≥ 5 ug/L PCE MCL



Sources for More Information

- **Site Information Repository**
 - Main Branch Library, 245 High Street, Downtown Montgomery
- **EPA Web Page/Toll-Free Number**
 - www.epa.gov/region4
 - 1-800-435-9234 (in Atlanta)
- **EPA Point of Contact**
 - Humberto Guzman
Remedial Project Manager, (404) 562-8942;
email: guzman.humberto@epa.gov