



August 19, 2009

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**MEMORANDUM**

**To:** Phillip D. Davis, Chief  
Solid Waste Branch

A handwritten signature in black ink, appearing to read "P.D. Davis", is written over the name in the "To:" field.

**From:** Wesley S. Edwards  
Hydrogeology Section  
Groundwater Branch

A handwritten signature in black ink, appearing to read "W.S. Edwards", is written over the name in the "From:" field.

**RE: Review of Groundwater Reports**  
Perry Co. Associates LF #53-03  
Perry County, Alabama

Review of the following documents for the above-referenced facility has been completed.

1. April 2009 Groundwater Monitoring Report

As a result of this review the following comments are provided.

1. Photocopies of the field data sheets should be included in the report. Please include a table or sheet that includes a thorough description of each site well (total depth and etc.).
2. Two or more potentiometric maps should be generated for the site. Water levels should be collected from all site monitoring wells. Monitoring wells GWM-15, GWM-16, and GWM-17 are installed in a straight line and are inadequate for determining ground water flow direction in the shallow aquifer. The background wells should be located in the same water bearing zone as downgradient wells. An additional well or wells should be added to the system to ensure compliance with Regulation 335-13-4-.27-(2)-(g)-1.
3. Statistical analysis indicated an SSI for concentrations of barium in wells GWM-15 and GWM-16.
4. The report does not indicate that additional samples were collected from wells with Statistically Significant Increases (SSIs) to validate the samples. In the future additional samples should be collected within 14 days to determine whether an SSI has occurred.
5. The report states that intrawell testing was not performed at this time because the current database is insufficient. When additional laboratory data becomes available intrawell statistical methods will be used to evaluate statistical significance. For this reason and



because other site wells contain similar amounts of barium the site should continue detection monitoring at this time.

Please contact me with any questions or comments at ext. 4242.

WSE

CC. David Hamilton, Enforcement and Remediation Section

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