

## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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ONIS "TREY" GLENN, III, P.E.

DIRECTOR

BOB RILEY

GOVERNOR

June 8, 2005

Ronald M. Levy  
BRAC Environmental Coordinator  
Environmental Office, 291 Jimmy Parks Blvd.  
US Army Garrison  
Fort McClellan, Alabama 36205

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Communication: 394-4383  
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Land: 279-3050  
Water: 279-3051  
Groundwater: 270-5631  
Field Operations: 272-8131  
Laboratory: 277-6718  
Mining: 394-4326

**RE: ADEM Notice of Concurrence:**

*Final Underground Storage Tank (UST) Removal Closure Reports, Response to Comments,*  
dated April 30, 2002

Fort McClellan, Calhoun County, Alabama

Facility ID No. AL4 210 020 562

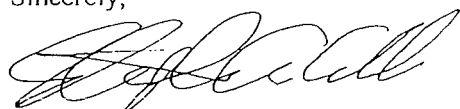
DSMOA Site No. 2535-223-0445

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the subject submittal addressing ADEM's review of the November 13, 2001 report entitled *Final Underground Storage Tank (UST) Removal Closure Reports*. ADEM's review comments on the Final Report were sent to the Army via letter dated April 2, 2002. The Army responded to these comments in a letter dated April 30, 2002. The Department concurs with the Army's response to comments.

For any questions or concerns regarding this matter, please contact Mr. Frederick Rudolph via email at [frudolph@adem.state.al.us](mailto:frudolph@adem.state.al.us) or at (334)-270-5687.

Sincerely,



Stephen A. Cobb, Chief  
Governmental Hazardous Waste Branch  
Land Division

SAC/TLP/FLR/mal

cc: Mr. Doyle Brittain/EPA Region 4  
Ms. Miki Schneider/JPA  
Mr. Greg Schank/Matrix  
Ms. Tracy Peace/ADEM  
Ms. Shana Decker/ADEM  
Ms. Brandi Little/ADEM

File: Land Div/Hazardous Waste/Fort McClellan/AL4210020562/Correspondence/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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ATLANTA, GEORGIA 30303-8960

November 16, 2001

EMAIL & US MAIL

4WD-FFB

Mr. Ron Levy  
BRAC Environmental Coordinator  
U.S. Army Garrison  
Environmental Office  
291 Jimmy Parks Boulevard  
Fort McClellan, AL 36205-5000

SUBJ: Underground Storage Tank Removal Closure Reports  
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed and approves the subject document. If you have any questions, please call me at (404) 562-8549.

Sincerely,

Doyle T. Brittain  
Senior Remedial Project Manager

cc: Lisa Kingsbury, Ft. McClellan  
Ellis Pope, USA/COE  
Phil Stroud, ADEM  
Jeanne Yacoub, IT  
Daniel Copeland, CEHNC-OE-DC  
Maj. Wayne Sartwell, ALANG  
Maj. Bernie Case, ALANG

RCUD NOV27'01 PM 1:52



DEPARTMENT OF THE ARMY  
U.S. ARMY GARRISON  
FORT McCLELLAN, ALABAMA 36205-5000

April 30, 2002

REPLY TO  
ATTENTION OF

Environmental Office

Mr. Stephen A. Cobb, Chief  
Alabama Department of Environmental Management  
Hazardous Waste Branch, Land Division  
P.O. Box 301463  
Montgomery, AL 36130-1463

Dear Mr. Cobb:

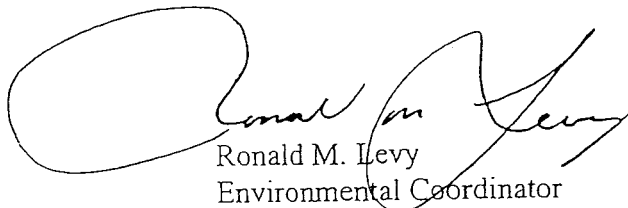
This letter serves to document discussions at the recent Base Realignment and Closure Cleanup Team (BCT) meeting in Alpharetta Georgia on April 16-18, 2002 and provide a written response to comments to the above referenced document.

During the April 2002 BCT meeting, Alabama Department of Environmental Management's (ADEM) comments to the above-referenced document were considered. Specifically, the issue of comparing analytical results at underground storage tank (UST) sites to the Alabama Risk Based Corrective Action initial screening levels (ISLs) instead of the Fort McClellan residential human health site-specific screening levels (SSSLs) was discussed. A subsequent telephone conversation between Mr. Philip Stroud (present at the BCT meeting) and Mr. Jim Grassiano of ADEM regarding this subject was relayed to the BCT. As a result of that conversation, Messrs. Stroud and Grassiano of ADEM agreed that the analytical results from UST sites at Fort McClellan will be compared to SSSLs to evaluate potential risk.

Based on the discussions at the April 2002 BCT meeting, the Army has enclosed responses to ADEM's comments to the above-referenced document.

If you have any questions or need additional clarification, please contact Mr. Lee Jaye at (256) 848-3120.

Sincerely,



Ronald M. Levy  
Environmental Coordinator

Enclosure

FINAL UNDERGROUND STORAGE TANK REMOVAL CLOSURE REPORTS  
FORT McCLELLAN, CALHOUN COUNTY, ALABAMA

RESPONSE TO COMMENTS BY THE ALABAMA DEPARTMENT  
OF ENVIRONMENTAL MANAGEMENT

*Parcel 16(7), Former Gas Station, Building 1394, at Former Motor Pool Area 1300, Parcel 148(7), Anomaly A-1 (2) (ADEM Identification No. D-2237)*

**Comment:** Sample LD 0008 exceeded the ISLs for benzene 3.6 mg/kg (ISL .00969 mg/kg), toluene 71 mg/kg (ISL 9.15 mg/kg); xylenes 250 mg/kg (ISL 13.1 mg/kg); and naphthalene 20 mg/kg (ISL 5.94 mg/kg). These results indicate that a release of petroleum has occurred and this release may adversely impact waters of the state. A Preliminary Investigation should be performed in accordance with ADEM Administrative Code R.335-6-05-.26.

**Response:** Disagree. The BCT (August, 2001) agreed that no further investigation is warranted because the detected concentrations of benzene, toluene, xylenes, and naphthalene are below their respective SSSLs (benzene, 21.7 mg/kg, toluene, 1,550 mg/kg, xylenes, 15,500 mg/kg, and naphthalene, 155 mg/kg). Furthermore, soil and groundwater sampling was conducted in the vicinity of Anomaly A-1 (2) [Parcel 16(7)], during a separate site investigation (SI), and no contaminants were observed exceeding SSSLs as reported in the *Final Site Investigation Report, Former Motor Pool Area 1300, 4<sup>th</sup> Avenue, Parcels 148(7) and 16(7), (IT, March 2001)*. Based on the results of the SI, the BCT agreed that no further action was required with regard to hazardous or toxicologic waste (HTRW). ADEM concurred with results of the report in a letter from Mr. Philip Stroud of ADEM addressed to Mr. Ron Levy of the Army on March 12, 2001.

*Parcel 132(7), Former Gas Station, Building 1594, at Former Motor Pool Area 1500, Parcel 94(7), Anomaly A-6 (1) (ADEM Identification No. D-2239)*

**Comment:** Sample LD0016 indicated the presence of 60.0 mg/kg lead, which exceeded the ISL of 42 mg/kg. Although this result indicates contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at the point of contamination. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Response:** The BCT (August, 2001) agreed that no further investigation is warranted because the detected concentration of lead (60.0 mg/kg) is below the human health residential SSSL of 400 mg/kg and only slightly above the 2 times the mean background value for lead of 38.5 mg/kg (SAIC, 1998).

*Enclosure*

*Parcel 132(7), Former Gas Station, Building 1594, at Former Motor Pool Area 1500, Parcel 94(7), Anomaly A-6 (1) (ADEM Identification No. D-2239)*

**Comment:** Sample LE0008 Indicate the presence of 84.6 mg/kg lead, which exceeded the ISL of 42 mg/kg. Although this result indicates contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at the point of contamination. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Response:** The BCT (August, 2001) agreed that no further investigation is warranted because the detected concentration of lead (84.6 mg/kg) is below the human health residential SSSL of 400 mg/kg and only slightly above the 2 times the mean background value for lead of 38.5 mg/kg (SAIC, 1998).

*Parcel 133(7), Former Gas Station, Building 1494, At Former Motor Pool Area 1500, Parcel 94(7), Anomaly A-1 (2) (ADEM Identification No. D-2240)*

**Comment:** No constituents of concern were identified in sample LF0006. No further investigation is warranted.

**Response:** Agree.

*Parcel 135(7), Former Gas Station, Building 594, at Former Waste Chemical Storage Area, Parcel 87(70), Anomaly A-1 (2) (ADEM Identification No. D-2241)*

**Comment:** Sample LH0009 indicated the presence of 49.1 mg/kg lead, which exceeded the ISL of 42 mg/kg. Although this result indicates contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at the point of contamination. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Response:** The BCT (August, 2001) agreed that no further investigation is warranted because the detected concentration of lead (49.1 mg/kg) is below the human health residential SSSL of 400 mg/kg and only slightly above the 2 times the mean background value for lead of 38.5 mg/kg (SAIC, 1998). Furthermore, soil and groundwater sampling was conducted in the vicinity of Anomaly A-1 (2) [Parcel 135(7)] during a separate site investigation (SI), and no contaminants were observed exceeding SSSLs as reported in the *Final Site Investigation Report, Former Waste Chemical Storage Area, Parcel 87(7), 10(7), and 135(7), (IT, May 2001)*. Based on the results of the SI, the BCT agreed that no further action was required with regard to HTRW. ADEM concurred with results of the report in a letter from Mr. Philip Stroud of ADEM addressed to Mr. Ron Levy of the Army on November 28, 2001.

*Parcel 137(7), Former Gas Station, Building 2094, at Former Motor Pool Area 2000, Parcel 144(7), Anomalies A-1 (7) and A-2 (1) (ADEM Identification No. D-2242)*

**Comment:** Samples LK0001, LK0002, and LK0014 indicate the presence of 70.2 mg/kg, 46.5 mg/kg, and 44.9 mg/kg lead which exceed the ISL of 42 mg/kg. Although this result indicates that contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at that point. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Response:** The BCT (August, 2001) agreed that no further investigation is warranted because the detected concentrations of lead (70.2 mg/kg, 46.5 mg/kg, and 44.9 mg/kg) are below the human health residential SSSL of 400 mg/kg and only slightly above the 2 times the mean background value for lead of 38.5 mg/kg (SAIC, 1998). Furthermore, soil and groundwater sampling was conducted in the vicinity of Anomalies A-1 (1) and A-2 (1) [Parcel 137(7)] during a separate site investigation (SI), and no contaminants were observed exceeding SSSLs as reported in the *Final Site Investigation Report, Former Motor Pool Area 2000, Parcels 144(7) and 137(7), March 2001, Fort McClellan, Alabama*. Based on the results of the SI, the BCT agreed that no further action was required with regard to HTRW. ADEM concurred with results of the report in a letter from Mr. Philip Stroud of ADEM addressed to Mr. Ron Levy of the Army on March 12, 2001.

*Parcel 140(7), Former Gas Station, Building 1294, at Former Decontamination Complex, Parcel 93(7), Anomaly A-1 (2) (ADEM Identification No. 2243)*

**Comment:** No constituents of concern were identified in samples LL0006 and LF0007. No further investigation is warranted.

**Response:** Agree.

*End of Comments*

#### *References*

ADEM, March 12, 2001, Subject: "ADEM's Concurrence on the Final Site Investigation Report, Former Motor Pool Area 2000, Parcels 144(7) and 137(7), March 2001, Fort McClellan, Alabama." Letter from P. Stroud to R. Levy, BRAC Environmental Coordinator.

ADEM, March 12, 2001, Subject: "ADEM's Concurrence on the Final Site Investigation Report, Former Motor Pool Area 1300, 4<sup>th</sup> Avenue, Parcels 148(7) and 16(7), March 2001, Fort McClellan, Alabama." Letter from P. Stroud to R. Levy, BRAC Environmental Coordinator.

ADEM, November 28, 2001, Subject: "ADEM Review and Concurrence: Final Site Investigation Report and Decision Document for the Former Waste Chemical Storage Area, Parcels 87(7), 10(7), and 135(7) dated May 2001, Fort McClellan, Calhoun County, Alabama Facility I.D. No. AL4 210 020 562." Letter from P. Stroud to R. Levy, BRAC Environmental Coordinator.

BCT Meeting Minutes, August 21-23, 2001, Fort McClellan, Alabama.

IT Corporation, (IT), March 2001. *Final Site Investigation Report, Former Motor Pool Area 1300, 4<sup>th</sup> Avenue, Parcels 148(7) and 16(7).*

IT Corporation, (IT), May 2001. *Final Site Investigation Report, Former Waste Chemical Storage Area, Parcel 87(7), 10(7), and 135(7).*

Science Applications International Corporation (1998). *Final Background Metals Survey Report*, report prepared for U.S. Army Corp of Engineers, Mobile District, July.

## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR

DIRECTOR

April 2, 2002

DON SIEGELMAN

GOVERNOR

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Land: 279-3050

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Groundwater: 270-5611

Field Operations: 272-8131

Laboratory: 277-6718

Mining: 394-4326

Education/Outreach: 394-4383

Ronald M. Levy  
BRAC Environmental Coordinator  
Environmental Office, 291 Jimmy Parks Blvd.  
US Army Garrison  
Fort McClellan, Alabama 36205

**RE: ADEM Review Comments: Final Underground Storage Tank (UST) Removal Closure Reports,**  
dated November 2001, Fort McClellan, Calhoun County, Alabama  
Facility I.D. No. AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management's (ADEM or the Department) has reviewed the subject document entitled *Final Underground Storage Tank Removal Closure Reports*, dated November 2001. The analytical results in the reports were reviewed and compared to the Alabama Risk Based Corrective Action initial screening levels (ISLs) established for residential or potential residential property. The Department's review is based solely on soil analytical results presented in the reports. Groundwater sampling was not conducted as part of the UST investigation thus far. Enclosed are ADEM's comments for your review and written response. Please submit response comments to the Department within 30 days from the date receipt of this letter.

If you have any questions or concerns regarding this matter please contact Mr. Philip Stroud at 334-270-5646 or via email at [pns@adem.state.al.us](mailto:pns@adem.state.al.us).

Sincerely,



Stephen A. Cobb, Chief  
Hazardous Waste Branch  
Land Division

SAC/ps

cc: Mr. Doyle Brittain/EPA Region 4  
Mr. Dan Copeland/ CEHNC-OE-DC, Huntsville  
Mr. Ellis Pope/USA COE, Mobile District  
Mr. Jim Grassiano/ADEM

File: ADEM Land Division/Hazardous Waste Branch/Fort McClellan, Correspondence, 2002





**ADEM REVIEW COMMENTS**  
*Final Underground Storage Tank Removal Closure Reports*  
*Fort McClellan, Alabama*

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*General Comments*

The results of the Department's review and ADEM's overall recommendations are presented separately below for each individual site. Note also that an identification number has been added by ADEM's UST Program to identify the report in ADEM's UST database.

**Parcel 16(7), Former Gas Station, Building 1394, at Former Motor Pool Area 1300, Parcel 148(7), Anomaly A-1 (2) (ADEM Identification No. D-2237)**

Sample LD 0008 exceeded the ISLs for benzene 3.6 mg/kg (ISL .00969 mg/kg), toluene 71 mg/kg (ISL 9.15 mg/kg); xylenes 250 mg/kg (ISL 13.1 mg/kg); and naphthalene 20 mg/kg (ISL 5.94 mg/kg). These results indicate that a release of petroleum has occurred and this release may adversely impact waters of the state. A Preliminary Investigation should be performed in accordance with ADEM Admin. Code R.335-6-05-.26.

**Parcel 16(7), Former Gas Station, Building 1394, at Former Motor Pool Area 1300, Parcel 148(7), Anomaly A-2 (2) (ADEM Identification No. D-2238)**

Sample LD0016 indicated the presence of 60.0 mg/kg lead, which exceeded the ISL of 42 mg/kg. Although this result indicates contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at the point of contamination. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Parcel 132(7), Former Gas Station, Building 1594, at Former Motor Pool Area 1500, Parcel 94(7), Anomaly A-6 (1) (ADEM Identification No. D-2239)**

Sample LE0008 Indicate the presence of 84.6 mg/kg lead, which exceeded the ISL of 42 mg/kg. Although this result indicates contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at the point of contamination. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical

results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Parcel 133(7), Former Gas Station, Building 1494, At Former Motor Pool Area 1500, Parcel 94(7), Anomaly A-1 (2) (ADEM Identification No. D-2240)**

No constituents of concern were identified in sample LF0006. No further investigation is warranted.

**Parcel 135(7), Former Gas Station, Building 594, at Former Waste Chemical Storage Area, Parcel 87(70), Anomaly A-1 (2) (ADEM Identification No. D-2241)**

Sample LH0009 indicated the presence of 49.1 mg/kg lead, which exceeded the ISL of 42 mg/kg. Although this result indicates contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at the point of contamination. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Parcel 137(7), Former Gas Station, Building 2094, at Former Motor Pool Area 2000, Parcel 144(7), Anomalies A-1 (7) and A-2 (1) (ADEM Identification No. D-2242)**

Samples LK0001, LK0002, and LK0014 indicate the presence of 70.2 mg/kg, 46.5 mg/kg, and 44.9 mg/kg lead which exceed the ISL of 42 mg/kg. Although this result indicates that contamination is present above the ISL, the ISL was established based on the potential for migration to a well located at that point. There is no well at the site and it seems unlikely that a well would be placed within 500 feet of the site. Thus, further investigation is not warranted at this time. Additionally no information was provided on background levels of lead in soil at Ft. McClellan for comparison with analytical results. The contamination should be recognized as present and that it could pose a future potential risk depending upon future use of the site.

**Parcel 140(7), Former Gas Station, Building 1294, at Former Decontamination Complex, Parcel 93(7), Anomaly A-1 (2) (ADEM Identification No. 2243)**

No constituents of concern were identified in samples LL0006 and LF0007. No further investigation is warranted.

*End of Comments*