

# ADEM



## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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June 23, 2005

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RETURN RECEIPT REQUESTED

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**RE: ADEM Concurrence:** November 25, 2002 Army Response to ADEM and EPA  
Comments on the *Final Site Investigation Report and Decision Document for the  
Artillery and Mortar Impact Areas, Parcel 138Q-X, 139Q-X, 140Q-X, 141Q-X, and  
142Q-X*, documents dated May 16, 2002  
Fort McClellan, Alabama  
DSMOA Site No: 2535-223-0445  
EPA ID No.: AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the Army's November 25, 2002 responses to ADEM and EPA Comments on the *Final-Site Investigation Report and Decision Document, Artillery and Mortar Impact Areas South of Bains Gap Road, Parcels 138Q-X, 139Q-X, 140Q-X, 141Q-X, and 142Q-X*.

The Army submitted the subject Final Site Investigation Report and Decision Document to the Department on May 16, 2002. In July 2002, ADEM submitted comments to the Army regarding this document. ADEM and the Army discussed the Army's response to ADEM's comments in the October 2002 Base Closure Team (BCT) meeting, and the Army subsequently did some further sampling and submitted their response to ADEM's comments on November 25, 2002. These responses to ADEM comments are the subject of this letter.

In ADEM Comment 1 under "Conclusion", ADEM stated that "land use controls are warranted to prevent the use of lead-contaminated groundwater at this site". No groundwater wells were placed in these parcels for investigation; however, it is stated in Appendix G - Preliminary Risk Assessment (PRA) that the seep water was evaluated as groundwater for the purposes of this Site Investigation. In the Army's response to ADEM's comment, it is clarified that lead was present in the initial sampling event (May 2001), but all lead detected in the supplemental seep water samples (taken January 2002)

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were below site specific screening levels (SSSL) and background concentration levels. The preliminary risk assessment (PRA) results which identified lead as a chemical of concern in the seep water was performed based only on the first round of sampling. Lead was eliminated as a chemical of concern after the seep water was resampled in January 2002. The results of the PRA also documents that no other site-related constituents presented unacceptable human health risks for the resident. Based on this information, it does not appear that this site requires land use controls restricting groundwater usage.

ADEM notes that the Impact Areas South of Bains Gap Road are located within two special interest natural areas (SINA), the Marcheta Hill Orchid Seep and the Marcheta Hill Crow-Poison Seep. These areas should remain protected using special management practices that promote the continued well being of these ecosystems. For this reason, as documented in the Final Decision Document, this property should be maintained as passive recreational use only.

The potential threat to ecological receptors was evaluated using comparison of site constituent concentrations to Fort McClellan's ecological screening values, background data, and upper background range data. The investigation identified barium, beryllium, and antimony as chemicals of potential ecological concern (COPEC). Antimony was eliminated as a COPEC due to its presence in the associated field blank.

Barium and beryllium were assumed to be naturally occurring, and therefore not expected to pose a threat to ecological receptors. The detections were infrequent and only marginally higher than background screening levels.

- The average beryllium concentration in the surface and depositional soil samples is 0.95 mg/kg, which is below the ESV (1.1 mg/kg) and only slightly exceeds the background concentration (0.8 mg/kg). Additionally, there were only four (4) beryllium hits out of 19 surface and depositional soil samples where concentrations (1.1 to 3.1 mg/kg) fell above the ESV and upper background (UGB) (0.87 mg/kg).
- Barium was only detected in one (1) soil sample (out of 19 surface and depositional soil samples) at an estimated ("J" flagged) concentration (488 mg/kg), which is above its ESV (165 mg/kg) and upper background range (288 mg/kg).

No geochemical analysis was performed using this data to substantiate the assertion that barium and beryllium are naturally occurring in the soil. However, at the time of this Site Investigation report, Fort McClellan had not established the practice of using geochemical analysis to establish that a data set is within background. In this case, the Department concurs with the conclusion that barium and beryllium are present in these samples due to variations in naturally occurring levels, and that these constituents are not expected to pose a threat to ecological receptors.

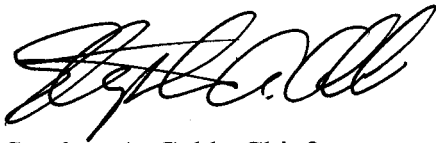
As a final point, in ADEM Comment 1 under "Conclusion", ADEM states that "the status of ordnance and explosives/unexploded ordnance (OE/UXO) at this site is unclear to

ADEM at this time". The Army's response to comments does not address ADEM's comment regarding the current state of unexploded ordnance (or Munitions and Explosives of Concern (MEC)) at this site. The areas addressed in this site investigation are located within the "Charlie" area and are identified as impact areas, and hence were qualified "X" because of the potential for unexploded ordnance. The Department recognizes that MEC issues may still remain in this area, and MEC related activities are being handled by the Army separately. The *Draft-Final Charlie Area Engineering Evaluation/Cost Analysis for Ordnance and Explosives* (document dated December 2004) is under the Department's review at this time. The MEC-related issues present at the site are acknowledged in the subject SI Report and Decision Document. Due to possible MEC issues, the release of this property for unrestricted land use is not suitable at this time.

The Department concurs with the recommended No Further Action remedy with regard to CERCLA related hazardous substances.

For any questions or concerns regarding this matter, please contact Ms. Shana Decker at (334) 270-5684 or via email at [sdecker@adem.state.al.us](mailto:sdecker@adem.state.al.us).

Sincerely,



Stephen A. Cobb, Chief  
Governmental Hazardous Waste Branch  
Land Division  
SAC/TCP/PS/SD/mal

cc: Mr. Dan Copeland/CEHNC-OE-DC  
Mr. Steve Miller/FWS  
Ms. Tracy Peace/ADEM  
Ms. Miki Schneider/Joint Powers Authority  
Mr. Greg Schank/Matrix  
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