



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 8, 2004

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

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RE: ADEM Notice of Concurrence;

*Final Supplemental RI Results for the Old Water Hole – Pelham Range
and Decision Document, Old Water Hole – Pelham Range, Parcel 205(7)
dated May 3, 2004*

Fort McClellan, Calhoun County, Alabama
EPA ID No. AL8 213 700 000
DSMOA Site ID 2535-223-0445

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the *Final Supplemental RI Results for the Old Water Hole – Pelham Range* and the *Decision Document, Old Water Hole – Pelham Range, Parcel 205(7)* dated May 3, 2004. ADEM's review comments on the *Draft Supplemental RI Results for the Old Water Hole – Pelham Range, Parcel 205(7)* dated May 27, 2003 were sent to the Army via letter dated February 2, 2004.

ADEM does not agree that the Tier 2 statistical evaluation adequately supports the conclusion that chromium in the groundwater is within the range of background. First, a background value for chromium in groundwater has not been established. For comparison purposes in the Box Plot statistical analysis, a value equal to "one half the lower reporting limit" replaces the minimum background value for chromium, since no background data exists for chromium in groundwater. No information is given to explain the upper background concentration used in the Box Plot. The actual chromium values were compared to these assumed background values, and were found to be above the background (reference Appendix F, Figure 1-6).

Second, the Hot Measurement Test states that chromium maximum detected concentration (0.015 mg/L) is less than the background 95th percentile (0.0168 mg/L). Again, it is unclear to the Department how the Army determined this 95th percentile background number, considering the lack of background data. The Department does not understand or agree with the Army's conclusion that chromium in groundwater is within the range of background.



Mr. Ronald M. Levy
July 8, 2004

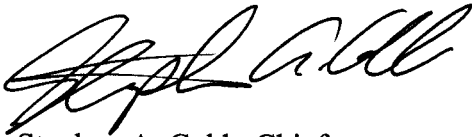
ADEM believes that chromium should have been carried on to Tier 3. This same argument applies to other elements lacking groundwater background values, such as nickel and selenium.

However, since the maximum contaminant level (MCL) for chromium is 0.100 mg/L, even if the contamination present is site related, it is too low to warrant remediation. Future statistical analyses at other sites should take this concern into account. The geophysical survey is considered a tool in the analysis of site related chemicals of concern, and should not be used haphazardly.

ADEM concurs with the recommendation of no further action with regards to hazardous substances, and unrestricted land reuse at the Old Water Hole, Parcel 205(7), Pelham Range.

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

Sincerely,



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

SAC/CHC/SD/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mr. David Bush/ADEM
Mr. Bernie Case/NGB
Mr. Lee Coker/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
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File:Land Div/Hazardous Waste/Fort McClellan/AL8213700000/Correspondence/2004



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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May 10, 2004

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Mr. Ron Levy
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Environmental Office
291 Jimmy Parks Boulevard, Bldg. 215
Fort McClellan, AL 36205-5000

SUBJ: Final Supplemental RI Results and Decision Document for the Old Water Hole - Pelham Range, Parcel 205(7); Fort McClellan

Dear Mr. Levy:

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

Sincerely,

Doyle T. Brittain
Senior Remedial Project Manager

cc: Lisa Holstein, Ft. McClellan
Philip Stroud, ADEM
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