ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR

DIRECTOR

June 20, 2002

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

RE: ADEM Review and Concurrence: Final Site Investigation Report and Decision Document, Former Personnel and Equipment Decontamination Station, Parcel 206(7), dated March 2002 Fort McClellan, Calhoun County, Alabama Facility ID No. AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the above referenced document. Draft findings related to the subject document were discussed at the Base Realignment and Closure Team (BCT) review meeting on February 20, 2002. During the meeting, the Department provided its comments on the site in an interactive manner such that the Army and BCT stakeholders could jointly resolve the Department's comments. As documented in the meeting minutes issued by IT Corporation, the Army recommended a No Further Action (NFA) designation for this parcel. EPA and ADEM stated that it was premature to make such a designation and requested that Fort McClellan conduct a Preliminary Risk Analysis (PRA) to support its request for an NFA designation. Fort McClellan conducted no further investigation but elected to submit a PRA as part of the Site Investigation (SI) Report for Parcel 206(7).

Human Health Issues

Although the site is projected for continued use by the Alabama Army National Guard, Fort McClellan has elected to screen its SI analytical data against residential human health site-specific screening levels (SSSLs) and media-specific upper background range screening values (UBRs) to evaluate for any potential threat to human receptors at the site. Fort McClellan identified four metals (antimony, barium, beryllium and copper) in surface soils and one polynuclear aromatic hydrocarbon (PAH) compound (benzo[a]pyrene) in the sediment sample as chemicals of potential concern at the site. See attachment for Fort McClellan's reported contaminant levels.

In all four metals Antimony was the only one detected at levels exceeding its SSSL. However, the magnitude of the exceedance was within the same order of magnitude as the established SSSL. Based on the relatively small magnitude of exceedance, Fort McClellan concluded that exposure to site media does not pose a significant threat to human receptors.

Ecological Health Issues

Fort McClellan also screened its SI analytical data against ecological screening values (ESVs) to evaluate the potential threat to ecological receptors at the site. Fort McClellan identified the same four metals (antimony, barium, beryllium and copper) in surface soils and one polynuclear aromatic hydrocarbon (PAH) compound (benzo[a]pyrene) in the sediment sample as chemicals of potential ecological concern at the site. See attachment for Fort McClellan's reported contaminant levels.



Mr. Ronald M. Levy June 20, 2002 Page 2

In all four metals and the PAH compound, the magnitude of the exceedences were within the same order of magnitude as the established ESVs and/or UBRs. Given the conservatism inherent in the ESVs and the relatively small magnitude of exceedences, Fort McClellan concluded that exposure to site media does not pose a significant threat to ecological receptors.

Explosive-related compounds and chemical warfare material (CWM) breakdown products were not detected in any site media.

ADEM's Conclusion

Based on the data presented and on the outcome of its PRA, Fort McClellan believes that exposure to environmental media at Parcel 206(7) poses no potential threat to human health and the environment. ADEM concurs with Fort McClellan's recommendation that the above referenced site be designated as NFA with unrestricted reuse.

ADEM has recently obtained the services of an ordnance and explosives/unexploded ordnance (OE/UXO) contractor to provide OE/UXO services to the Department. ADEM will provide comments concerning OE/UXO related issues, under separate cover, after the contractor has had an opportunity to review OE/UXO related activities at this site.

For any questions concerning this matter, please contact Mr. Philip Stroud at 334-270-5646 or via email at pns@adem.state.al.us.

Sincerely,

Wm. Gerald Hardy, Chief

Land Division

SAC/MH/sep/:L:Gov Fac Sec/Harrison/Fort McClellan/SI, Personnel & Equipment Decon Parcel 206(7).doc

cc: Mr. Jim Grassiano/ADEM

Mr. Philip Stroud/ADEM
Mr. Mark Harrison/ADEM

File: Land Division/DSMOA/HW/Fort McClellan/Correspondence, 2002

Summary of Former Per	Summary of Fort McClellan's Reported Contaminant Levels: Former Personnel and Equipment Decontamination Station, Parcel 206(7)	Summary of Fort McClellan's Reported Contaminant Levels: Former Personnel and Equipment Decontamination Station,	ontaminant Lev amination Stati	els: on, Parcel 206(7)				
Metals	Reported	SSSL	UBR	ESV	Sample Type	Number of	Exceeds	Exceeds	Exceeds
	Level					Samples	SSSL	UBR	ESV
		-							
Antimony	4.89-mg/kg	3.11-mg/kg	2.6-mg/kg	3.5-mg/kg	Surface Soil	1 of 3	Yes	Yes	Yes
Barium	364-ma/ka	547-ma/ka	288-ma/ka	165-ma/ka	Surface Soil	1 of 3	20	Y-pc	Yes
	c	,	Q Q	g	9			-	
Beryllium	1.61-mg/kg	9.6-mg/kg	0.87-mg/kg	1.10-mg/kg	Surface Soil	2 of 3	No	Yes	Yes
	1.16-mg/kg						No	Yes	Yes
Copper	43.2-mg/kg	313-mg/kg	24.0-mg/kg	40-ma/ka	Surface Soil	2 of 3	No	Yes	Yes
	41.4-mg/kg						No	Yes	Yes
Bonzo(a)	0.40 malka	000 malka		000000000000000000000000000000000000000			2	2	X
Delizo(a)	64/6/11-7±-0	0.30-1119/ NG	5	Ga/Bill-co.o	Gedillelit		No	3	T GS
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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November 4, 2002

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4WD-FFB

Mr. Philip Stroud
Alabama Department of Environmental Management
Hazardous Waste Branch, Land Division
1400 Coliseum Boulevard
PO Box 301463
Montgomery, AL 36110-2059

SUBJ: Final Site Investigation Report and Final Decision Document for the Former Personnel and Equipment Decontamination Station, Parcel 206(7); Fort McClellan

Dear Mr. Stroud:

The Environmental Protection Agency (EPA) has reviewed the subject document and determined that all previous EPA comments have been adequately addressed. Therefore, EPA considers the subject document acceptable for approval. As the Alabama Department of Environmental Management (ADEM) considers appropriate, please transmit these comments to Fort McClellan (FTMC). If you have any questions, please call me at (404) 562-8549.

Doyle T. Brittain

Senior Remedial Project Manager

cc: Ron Levy, FTMC
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