

# ADEM



## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR  
DIRECTOR

DON SIEGELMAN  
GOVERNOR

October 17, 2001

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 Review and Concurrence: Final Site Investigation Report and Decision Document for the Boiler Plant No. 2, Building 2278, Parcels 23(7) and 226(7)** dated June 2001, Fort McClellan, Calhoun County, Alabama

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the *Final Site Investigation Report* and the Army's *Decision Document for the Boiler Plant No. 2, Building 2278, Parcels 23(7) and 226(7)*, both dated June 2001 for Fort McClellan.

The subject documents were discussed during the Base Realignment and Closure Team (BCT) on-board review meeting on May 10, 2001. During the BCT on-board review meeting, the Department provided its comments on both documents in an interactive manner such that the Army and BCT stakeholders could jointly resolve the Department's comments. The Department's comments are noted in the documented minutes of this meeting.

An overview of the discussion that took place during the May on-board-review meeting is presented below. The following is a paraphrased narrative of the meeting minutes issued by IT Corporation on May 10, 2001:

***Boiler Plant No. 2, Building 2278: Parcels 23(7) and 226(7)***- The BCT previously reviewed this site in March 1999, and recommended that "No Further Action (NFA) with Unrestricted Use" is appropriate for this site based on the QST Inc. report and associated data. Parcel 23 consists of two 25,000-gallon underground storage tanks (USTs) (containing No. 4 heating oil) and Parcel 226 is the building and surrounding areas. The data for this site indicated low levels of volatile organic compounds (VOCs) that exceeded ecological screening values (ESVs), but not site specific screening levels (SSSLs). The current reuse plan identifies this property as part of the National Guard enclave.

*During discussions of this site, the National Guard Bureau (NGB) personnel inquired about the BCT's screening process. The team explained how the screening values were established,*

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approved, and applied. IT Corporation (IT) explained that the human health screening values were developed using EPA-and ADEM-approved methods and exposure assumptions. The ecological screening values (ESVs) are a compendium of benchmark values from EPA Region IV where those values exist, and from other EPA-approved sources where EPA Region IV does not have established benchmark values (other EPA regions, various ecological studies). Properties are screened against residential human health and also ecological screening values. If the property passes the residential screen, it is released for unrestricted reuse. If it fails the residential screening, the property requires a restriction for release. This information is documented in both the Site Investigation Report and the Decision Document for the parcels in question.

ADEM also explained the relationship between turbidity in groundwater and metals concentrations in groundwater. ADEM described the Base's effort to perform selective resampling of groundwater using low-flow sampling techniques and the analytical results for the low-flow samples that demonstrated a significant reduction in metals concentrations. The NGB inquired if the base was filtering groundwater samples, and was told no: neither EPA nor ADEM approved filtering of groundwater samples. However, IT did institute a change in all future groundwater procedures to incorporate the low-flow technique, based on the BCT's request, after review of the groundwater resampling results for these parcels.

The BCT agreed that the March 1999 decision to recommended "No Further Action (NFA) with Unrestricted Use" for this site was sound. EPA indicated the NFA is justified based on very low levels of VOCs, limited ecological habitat, and because analytical concentrations passed SSSLs. Also, where IT did perform duplicate sampling, VOCs were not detected at these parcels as well as post-wide to date. The USTs were removed in accordance with ADEM regulations and are included in the Site Investigation Report.

As discussed in the meeting and as presented in the Final Site Investigation Report and accompanying Decision Document, it appears that this parcel does not pose a substantial risk to potential human and ecological receptors. The Department understands that this Decision Document is an Army-lead document under the signatory approval of the Army. However, the Department concurs with the BCT's recommendation that this site warrants no further action and an unrestricted use designation.

For 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. Ellis Pope/USA COE, Mobile District  
Mr. Jim Grassiano/ADEM  
Mr. Mark Harrison/ADEM

File: ADEM Land Division/Hazardous Waste Branch/Fort McClellan, Correspondence, 2001



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

July 20, 2001

EMAIL & HAND DELIVERY

4WD-FFB

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

SUBJ: Final Site Investigation Report for the Boiler Plant No. 2, Building 2278, Parcels 23(7) and 226(7)  
Final Decision Document for the Boiler Plant No. 2, Building 2278, Parcels 23(7) and 226(7)  
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject documents. Based upon the information provided to EPA and as agreed upon in the May 24-25, 2001, On Board Review Project Team Meeting, EPA agrees with and approves the subject documents. Thank you for your cooperation. If you have any questions, please call me at (404) 562-8549.

Sincerely,

A handwritten signature in cursive script that reads "Doyle V. Brittain".

Doyle V. Brittain  
Senior Remedial Project Manager

cc: Lisa Kingsbury, Ft. McClellan  
Ellis Pope, USA, COE  
Phil Stroud, ADEM  
Jeanne Yacoub, IT  
Dan Copeland, USACE  
Maj. Bernie Case, ALANG  
Maj. Wayne Sartwell, ALANG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

May 14, 2001

EMAIL & HAND DELIVERY

4WD-FFB

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

SUBJ: Site Investigation Report for the Boiler Plant No. 2, Buildings 2278 and 2202, Parcels  
23(7) and 226(7)  
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject document. Based upon the information provided to EPA and as agreed upon in the May 10, 2001, On Board Review, EPA agrees with and approves the subject document. Thank you for your cooperation. If you have any questions, please call me at (404) 562-8549.

Sincerely,

A handwritten signature in black ink, reading "Doyle T. Brittain". The signature is fluid and cursive, with a large initial "D" and a long horizontal stroke at the end.

Doyle T. Brittain  
Senior Remedial Project Manager

cc: Lisa Kingsbury, Ft. McClellan  
Jeanne A. Yacoub, IT  
Ellis Pope, USA/COE  
Phil Stroud, ADEM