ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 ♦ 1400 COLISEUM BLVD. 36110-2059

MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US

(334) 271-7700

JAMES W. WARR
DIRECTOR

DON SIEGELMAN
GOVERNOR

Facsimiles: (334)
Administration: 271-7950
General Counsel: 394-4332
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-8131
Laboratory: 277-6718
Mining: 394-4326
Education/Outreach: 394-4383

November 28, 2001

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 for the Former Ordnance Motor Repair Area-Parcels 75(7), 5(7), 6(7), 41(7), and 42(7),* dated September 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 *Decision Document for the Former Ordnance Motor Repair Area-Parcels 75(7), 5(7), 6(7), 41(7), and 42(7),* both dated September 2001 for Fort McClellan.

The subject documents were discussed during the Base Realignment and Closure Team (BCT) on-board review meetings on February 5-6, 2001 and May 10, 2001. During the May 10, 2001 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:

> ***Former Ordnance Motor Repair Area: Parcels 75(7), 5(7), 6(7), 41(7), and 42(7)****- The potential threat to human receptors is expected to be low. Although the site is projected for industrial reuse, the soils and groundwater data were screened against residential human health site-specific screening levels (SSSLs) to evaluate the site for possible unrestricted land reuse. In soils, four metals (barium [at two surface locations], chromium [one surface location], iron [one surface location and one subsurface location], and lead [two surface locations]) were detected at concentrations exceeding residential human health SSSLs, background concentrations, and range of background values (Science Application International Corporation (SAIC), July 1998,* ***Final Background Metals Survey Report, Fort McClellan, Alabama****). Chromium was detected at a concentration of 140 milligrams per kilogram (mg/kg) in sample number PPMP-75-GP40. The range of background for chromium is 134 mg/kg. Even though chromium was above the range of background values, the results only slightly exceeded the values. Confirmation testing was conducted by Fort McClellan at the request of EPA and ADEM at the three surface soil sample locations with elevated barium or lead concentrations. Based on the results of the confirmation samples, the barium and lead results were determined to be isolated "hot spots" and not representative of nominal site conditions.*

Several polynuclear aromatic hydrocarbon (PAH) compounds were detected at concentrations exceeding SSSLs and the established PAH background screening values in several surface soil samples (IT Corporation (IT), March 2000, ***Final Human Health and Ecological Screening Values and PAH Background Summary Report, Fort McClellan, Calhoun County, Alabama****). In addition, five PAH compounds exceeded SSSLs in two subsurface soil samples. However, based on the limited spatial distribution of PAHs at the site, PAHs are not believed to be a parameter of concern for this site. Furthermore, the elevated PAHs appear to be a result of anthropogenic activities (e.g., asphalt pavement) and do not appear to be related to former site operations.*

In groundwater, numerous metals were detected at concentrations exceeding both SSSLs and background concentrations. However, the majority of these metals were present in samples that had high turbidity at the time of sample collection. The high turbidity is believed to be the cause of the elevated metals levels, based on results of follow-up sampling. As a potential result of high-turbidity samples, the concentrations of only six metals (aluminum, barium, iron, manganese, thallium, and vanadium) exceeded SSSLs and background concentrations. Of these metals, aluminum (18.1 milligrams per liter [mg/]), iron (26.3 mg/L), and vanadium (0.0278 mg/L) in sample PPMP-75-GP05 slightly exceeded or were within the same order of magnitude for the range of background values (9.6, 25.8 and 0.011 mg/L, respectively).

Metals, volatile organic compounds (VOCs), and semivolatile compounds (SVOCs), and pesticides were detected in site media (primarily in surface and depositional soils) at concentrations exceeding ecological screening values (ESVs). In addition, one herbicide and one polychlorinated biphenyl (PCB) were detected in one surface/depositional soil sample, each at concentrations exceeding ESVs. However, the potential impact to ecological receptors is expected to be minimal based on the limited existing viable habitat and present and anticipated future site conditions. The site is located in a well-developed industrialized area, consisting of buildings, paved roads/areas, and railroad tracts interspersed with limited grassed areas, and is projected for continued industrial land use. Viable ecological habitat is presently limited and is not expected to increase in the future land use scenario. Consequently, the potential threat to ecological receptors is expected to be low (IT Corporation (IT), March 2000, ***Final Human Health and Ecological Screening Values and PAH Background Summary Report, Fort McClellan, Calhoun County, Alabama****).*

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.

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

October 16, 2001

EMAIL & US MAIL

4WD-FFB

Mr. Ron Levy
BRAC Environmental Coordinator
U.S. Army Garrison
Environmental Office
Building 215, 15th Street
Fort McClellan, AL 36205-5000

SUBJ: Final Site Investigation Report for the Former Ordnance Motor Repair Area, Parcels 75(7), 5(7), 6(7), 41(7), and 42(7), &
Final Decision Document for the Former Ordnance Motor Repair Area, Parcels 75(7), 5(7), 6(7), 41(7), and 42(7)
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject documents. As discussed and agreed upon in several On Board Reviews, 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,

Doyle T. Brittain

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