

ADEM



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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June 1, 2004

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

RE: ADEM Review and Notice of Concurrence: Final- Site Investigation Report-Range 23A, Multipurpose Range, Parcel 109(7)/152Q-X, dated January 2004
Fort McClellan, Calhoun County, Alabama
Facility ID No. AL4 210 020 562
DSMOA Fund Code: 2535-223-0445

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort McClellan's submittal of the subject *Site Investigation (SI) Report for Range 23A*.

Range 23A occupies approximately 41 acres in the north-central portion of Pelham Range. ADEM understands that this multipurpose range was formerly used by the Fort McClellan Chemical School for a number of training activities including field flame expedient (FFE) training, wall-of-flame training, hasty mine training, nuke-simulator training, and modernized demolition initiators (MDI) training. Range 23A was also reportedly known as the Flame Operations Range. Fort McClellan reportedly completed this SI effort to assess the potential presence of chemical constituents at the site that may have resulted from historical range training activities.

Fort McClellan's SI effort included the collection of 11 surface soil samples, 11 subsurface soil samples, 6 surface water samples, and 6 sediment samples and also the collection of groundwater samples from 4 monitoring wells. Fort McClellan identified the presence of several contaminants including metals (aluminum, barium, manganese and thallium) and arsenic in various site media. These contaminants were found to be present at concentrations exceeding human health site specific screening levels (SSSLs) for a potential residential exposure scenario, ecological screening values (ESVs), and established background values. As a result, Fort McClellan identified these parameters as chemicals of potential concern (COPCs).

Fort McClellan's SI Report also investigated the possibility that the above referenced COPCs may be naturally occurring. To conduct this facet of the investigation, Fort McClellan further assessed the data using statistical and geochemical methods. Fort McClellan also completed a preliminary ecological risk assessment (PERA) to characterize potential risks to ecological receptors.

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Mr. Ronald M. Levy

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Range 23A is located on Pelham Range, which ADEM understands is projected for continued military use by the National Guard Bureau. However, Fort McClellan is apparently striving for an unrestricted reuse designation for this land parcel. As a result, Fort McClellan conducted a Preliminary Risk Assessment (PRA) based on a comparison of site contaminant levels to residential health-based screening levels. Based on this comparison, Fort McClellan's risk assessment recommends that this site is suitable for unrestricted reuse.

Additional lines of evidence to support an unconditional No Further Action were provided by the Army. As part of Fort McClellan's assessment of COPC data, the Army submitted its statistical and geochemical evaluation of the data indicating that all of the identified COPCs were naturally occurring. The Army's PERA also clarified that Fort McClellan did not identify any chemicals of potential ecological concern (COPECs) in site media. In summary, Fort McClellan's SI Report concluded that the constituents detected at Range 23A do not pose an unacceptable risk to human health or the environment.

ADEM concurs with Fort McClellan's recommendation of No Further Action and unrestricted land reuse with regard to CERCLA-related hazardous substances at Range 23A. However, the Department understands that Unexploded Ordnance may be present at Range 23A and that further investigation is warranted to assess and remediate potential UXO issues at this site. At this time, UXO issues remain unsolved in this area and will be addressed when the Army or the Army National Guard Bureau (NGB) begin to address UXO issues at Pelham Range. ADEM understands that the Range 23A parcel will be transferred in the coming months from the Army's Base Transition Force to the NGB. Because of the potential presence of UXO, the Army and NGB should implement appropriate Land Use Controls to properly limit site access and ensure appropriate site safety until UXO issues are fully addressed and until a formal Land Use Control Implementation Plan (LUCIP) is developed for this parcel.

If you have any questions or concerns regarding this matter please contact Ms. Kajuana Rice at (334)270-5636 or via e-mail at krice@adem.state.al.us.

Mr. Ronald M. Levy

June 1, 2004

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Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Cobb".

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

SAC/KDR/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Lee Coker/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
Mr. Shana Decker/ADEM
Mr. David Bush/ADEM
Mr. Bernie Case/Army National Guard Bureau
Mr. Scott Weber/Army Environmental Center

File: Land Division/Hazardous Waste/Fort McClellan/Correspondence/2004



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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February 4, 2004

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Mr. Ron Levy
BRAC Environmental Coordinator
U.S. Army Garrison/Transition Force
Environmental Office
291 Jimmy Parks Boulevard, Bldg. 215
Fort McClellan, AL 36205-5000

SUBJ: Final Site Investigation Report and Decision Document for Range 23A, Multipurpose
Range, Parcel 109(7)/152Q-X; Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject document and determined that EPA's comments on the draft document were adequately addressed. Therefore, EPA approves the subject document. 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 the first name "Doyle" being the most prominent.

Doyle T. Brittain
Senior Remedial Project Manager

cc: Lisa Holstein, Ft. McClellan
Philip Stroud, ADEM
Jeanne Yacoub, Shaw