



**DEPARTMENT OF THE ARMY**  
**OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9**  
**600 ARMY PENTAGON**  
**WASHINGTON, DC 20310-0600**

October 18, 2023

DAIN-ISE

Mr. Jason Odom  
Calhoun County McClellan Development Authority (MDA)  
4975 Bains Gap Road  
Anniston, AL 36205

Dear Mr. Odom:

The purpose of this letter is to rescind the Army's letter dated March 20, 2018 (Enclosure 1), regarding the work documented in the Corrective Measures Implementation Report, Soil Remediation, Former Fort McClellan – Baby Bains Gap Road Ranges, Range 23 & 25 East, Anniston, AL, dated November 2016, Rev. 1 (CMIR). Based on the Army's review of your letter dated April 10, 2018 (Enclosure 2), and the Alabama Department of Environmental Management (ADEM) letter of review and concurrence dated December 8, 2017 (Enclosure 3), and the controlling transfer documents, including the August 2003 Finding of Suitability for Early Transfer (FOSET) and the 2003 early transfer deed, conveying title of the former Fort McClellan to the McClellan Development Authority (MDA), the Base Realignment and Closure (BRAC) Division concurs with ADEM that the remediation is complete and that the parcels have been remediated to cleanup levels of 3 milligrams per kilogram (mg/kg) for antimony and 400 mg/kg for lead, a standard that allows for unrestricted reuse.

In accordance with the early transfer documents, and the deed conveying title, the Army entered into agreements with the MDA's predecessor to fund the environmental remediation which would be conducted pursuant to a Cleanup Agreement between the MDA and ADEM. Any remediation found to be necessary in the future to remediate beyond the standard for the intended reuse would be borne by the Grantee. Any remediation found to be necessary after property transfer based on unknown contaminants is the responsibility of the Grantor (Army). Under these provisions, the Army supports ADEM's determination that the remediation has met the standards allowing for unrestricted reuse.

Copies of this correspondence were provided to Ms. Ashley Mastin, ADEM.



If you have questions concerning this matter, please contact me at 703-545-2487 or by email at [thomas.a.lineer.civ@army.mil](mailto:thomas.a.lineer.civ@army.mil).

Sincerely,

Thomas A. Lineer  
Site/BRAC Program Manager  
Army Environmental Division (DAIN-ISE)  
HQDA/ODCS G-9

Enclosures





**DEPARTMENT OF THE ARMY**  
**OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT**  
**600 ARMY PENTAGON**  
**WASHINGTON DC 20310-2400**

REPLY TO  
ATTENTION OF

March 20, 2018

Base Realignment and Closure Division

Mr. Robin Scott  
McClellan Development Authority  
PO Box 5327  
Anniston, AL 36205

Dear Mr. Scott:

The U.S. Army is in receipt of the *Corrective Measures Implementation Report, Soil Remediation, Former Ft. McClellan - Baby Bains Gap Road Ranges, Range 23 & 25 East, Anniston, AL*, dated November 2016, Rev. 1. Based on our review of the document, it appears the delineation sampling at Range 23 was not sufficient to adequately define the lead contaminated soil at all of the pop-up target mounds.

The nature and extent of the lead contamination at Range 23 was previously documented by the Army in the September 2012, *Remedial Investigation Report, Baby Bains Gap Road Ranges, Range 18, Parcel 74Q; Range 20, Parcel 76Q-X; Range 23, Parcel 79Q; Range 26, Parcel 84Q-X; Range 25, Parcels 83Q and 118Q-X; Range 25 East, Parcel 223Q; Range 28, Parcel 86Q; Area of Further Investigation for Ranges South of Range 25, Parcels 224Q and 226Q; and Probable Impact Area for Parcel 227Q*. The report was concurred with by Alabama Department of Environmental Management on October 10, 2012.

Range 23 features included 16 separate firing lanes, each with a firing point and a series of six man made earthen mounds approximately 3 feet high by 6-8 feet in circumference located at 50, 100, 150, 200, 250 and 300 meters from each of the 16 firing points (a total of 96 mounds with pop-up targets).

Samples collected at Range 23 during the remedial investigation were collected in areas expected to exhibit maximum contamination (i.e., ten pop-up target mounds from ten different firing lanes). The extrapolated contours presented on Figure 4-1 in the remedial investigation report were based on the assumption that the sample results would be representative of all of the target mounds. Of the ten mounds sampled during the remedial investigation, nine had lead levels above the targeted cleanup level (i.e., 400 mg/kg) identified in the Corrective Measures Implementation Report.

The Corrective Measures Implementation Report indicates that the horizontal extent of lead contaminated soil was determined by dividing the Range 23 boundaries into 65x154-foot gridded cells and collecting five-point composite samples from each cell. By using this approach, it appears that soil contamination in many of the mounds may not have been adequately delineated.

Enclosure 1



Of the 96 target mounds located in Range 23, only 19 gridded cells impacting 18 target mounds were excavated.

It is the Army's position that the corrective measures implemented at Range 23 are incomplete and do not fulfill the requirements for site closeout in accordance with the Environmental Services Cooperative Agreement No. W9128F-07-2-0163.

Should additional corrective measures be required in the future, you may be notified of your potential liability with respect to this site.

Copies of this correspondence were provided to Mr. Jason Wilson, ADEM.

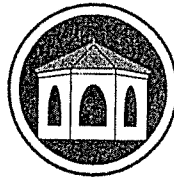
If you have questions concerning this matter, please contact me at 404-469-3399 or by email at [owen.m.nuttall.civ@mail.mil](mailto:owen.m.nuttall.civ@mail.mil).

Sincerely,

NUTTALL.OWEN.MONROE.1229654930  
Digitally signed by  
NUTTALL.OWEN.MONROE.12296  
54930  
Date: 2018.03.20 10:21:45 -04'00'

Owen Nuttall  
BRAC Environmental Coordinator  
1508 Hood Avenue, Room A-103  
Forest Park, GA 30297





## McCLELLAN DEVELOPMENT AUTHORITY

April 10, 2018

Mr. Owen Nuttall  
BRAC Environmental Coordinator  
1508 Hood Avenue, Room A-103  
Forest Park, GA 30297

We are in receipt of your letter dated March 20, 2018 regarding your position with respect to the *Corrective Measures Implementation Report, Soil Remediation, Former Fort McClellan – Baby Bains Gap Road Ranges, Range 23 & 25 East*, Anniston, AL, dated November 2016, Rev.1 (CMIR). The Alabama Department of Environmental Management (ADEM) approved the CMIR, through the issuance of a concurrence letter, on December 8, 2017.

The work documented in the CMIR was completed in accordance with the ADEM – approved *Corrective Measures Implementation Plan – Soil Remediation McClellan Baby Bains Gap Road Ranges, Range 23 & 25 East*, Anniston, AL, Rev. 1 (CMIP). The CMIP was developed in accordance with the Cleanup Agreement, No. AL4 210 020 562, Mod. 4 (CA) between the MDA and ADEM, the then current *Alabama Environmental Investigation and Remediation Guidance document, Rev.3*, September 2005, the *Superfund Lead- Contaminated Residential Sites Handbook* (EPA, 2003), *Alabama Risk Based Corrective Action Manual, Rev. 3.0*, February 2017 (ARBCA), and the ADEM Corrective Measures Implementation (CMI) remediation checklist.

It is important to note that during the Remedial Investigation (RI) completed by the Army, sampling data from ten target mounds was extrapolated to be representative of all 96 target mounds in Range 23. Following completion of the RI and prior to performing the metals remediation two events, that had a notable impact on the projected areas of contamination associated with the target mounds, occurred. First, MEC remediation efforts in Range 23 included the digging and removal of the concrete structures associated with the pop up targets at each mound. The second event, which was a precursor to the metals remediation, was the cutting and removal of all trees/vegetation in the range. Both of these events disturbed the contaminant distribution in the surface soil. Additionally, active contaminant fate and transport mechanisms can result in the redistribution of site contaminants. Therefore, prior to performing soil remediation the decision was made to characterize the entire range.

The delineation sampling performed by MDA and its contractors as part of the remediation was complete, thorough, and systematic for determining areas requiring removal. The composite sampling approach that was employed for delineating contamination is a widely accepted technique throughout the industry. The entire target mound area encompassing all 96 mounds was gridded and sampled using a cell size appropriate to account for the features and protective of human health and the environment. The geometry of the grid system was established to more closely represent the site conditions of Range 23, which resulted in 50 grids encompassing all 96 mounds. Furthermore, the cell size used (65 x 154-foot) is smaller than the recommended size for achieving unrestricted use in a residential setting (1/3 acre – 1 acre), even though the projected reuse of the area is industrial.

Enclosure 2



During the execution of the delineation phase of the remediation process, the MDA collected more than fifty (50) samples in the area of Range 23, including more than ten (10) additional duplicate samples in this area. As part of the Quality Assurance/Quality Control procedures established for this remediation, the MDA also performed four (4) spatial variability duplicate samples to ensure that the selected sample locations were representative of site conditions. These samples were analyzed with an X-Ray Fluorescence instrument (XRF), with select samples being sent for offsite laboratory analysis to ensure the XRF accuracy. It should be noted that this remediation process is similar to the remediation work performed by the Army at the Alabama Department of Transportation portions of the Iron Mountain Road Ranges, as presented in the *Final, Removal Action Report, Iron Mountain Road Ranges Soil Remediation on ALDOT Eastern Bypass Corridor Property*, March 2006.

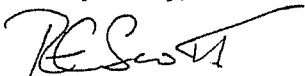
The environmental remediation of Ranges 23 & 25 East was performed in strict accordance with the approved CMIP under ADEM oversight. No deviations from the approved technical approach were implemented during the remediation activities.

Environmental Services Cooperative Agreement No. W9128F-07-2-0163 (ESCA) between the Army and the MDA states that the Recipient (MDA) is obligated to comply with the Cleanup Agreement under oversight by ADEM, and that the Army and MDA agree that the performance of the Environmental Services by the MDA will satisfy those obligations of the Army under CERCLA and NCP.

Bottom line, the MDA believes that the lead contamination delineation sampling on Range 23 was thorough and complete and all requirements with respect to the Environmental Services (remediation) for Ranges 23 and 25 East were satisfied. The MDA is currently in the process of completing the Final Report of Corrective Measures (FRCM) for this Site.

One final note; the Army Transition Force and JPA/MDA have enjoyed a close and productive collaboration dealing with environmental cleanup issues on McClellan for well over a decade. Our offices are less than a one mile drive from each other. As we have done in the past, The MDA /Matrix team stands ready to meet informally at any time and answer any questions or provide additional clarifications that may arise during Army review of related program decision documents. More often than not, such issues can be quickly resolved in this manner and obviate the need for formal notifications and, if required, follow-on negotiations in accordance with the ESCA agreement.

Respectfully,



Robin Scott  
Executive Director  
McClellan Development Authority

Cc: Mr. Tom Lederle/U.S. Army BRAC  
Mr. Jason Wilson/ADEM  
Mr. Richard Satkin/Matrix



LANCE R. LEFLEUR  
DIRECTOR



KAY IVEY  
GOVERNOR

Alabama Department of Environmental Management  
adem.alabama.gov

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(334) 271-7700 ■ FAX (334) 271-7950



December 8, 2017

Mr. Robin Scott  
Chief Executive Officer  
McClellan Development Authority  
4975 Bains Gap Road  
Anniston, Alabama 36205

**RE: ADEM Review and Concurrence:** Replacement Pages and Responses to ADEM  
Comments regarding the *Corrective Measures Implementation Report, Soil Remediation,*  
*McClellan Baby Bains Gap Road Ranges, Range 23 and Range 25 East* dated October 25, 2017  
Fort McClellan, Calhoun County, Alabama  
Facility I.D. AL4 210 020 562

Dear Mr. Scott:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the McClellan Development Authority's (MDA) replacement pages and responses to ADEM comments regarding the *Corrective Measures Implementation Report (CMIR) for the Baby Bains Gap Road Ranges, Range 23 and Range 25 East*. Based on this review, ADEM has determined that all comments have been resolved. Therefore, ADEM concurs with the overall content of the *CMIR*.

If you have any questions or concerns regarding this matter please contact Ms. Kaneshia Townsend at 334-394-4356 or via email at [ktownsend@adem.alabama.gov](mailto:ktownsend@adem.alabama.gov).

Sincerely,

Jason Wilson, Chief  
Governmental Hazardous Waste Branch  
Land Division

JJW/ATM/KLT/akr

cc: Mr. Richard Satkin/Matrix  
Ms. Lisa Holstein/Army

Ms. Brandi Little/ADEM  
Ms. Ashley Mastin/ADEM

Enclosure 3

Birmingham Branch  
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