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August 29, 2005

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Subject: Cleanup Agreement No. A14 210 020 562  
Transmittal of Final Engineering Evaluation and Cost Analysis (EE/CA) Action  
Memorandum Alpha Area Munitions and Explosives of Concern, McClellan,  
Anniston, Alabama

Dear Ms. Decker and Ms. Mills:

This letter is sent to forward copies of the Final Engineering Evaluation and Cost Analysis (EE/CA) Action Memorandum Alpha Area Munitions and Explosives of Concern, McClellan, Anniston, Alabama for your review on behalf of the Anniston Calhoun County Fort McClellan Development Joint Powers Authority. Our responses to comments on the Draft Final version are attached. Please contact me at 404.414.7054 if you have any questions on this submittal.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC.

Richard L. Satkin, P.G.  
Senior Project Manager

c: Miki Schneider – JPA  
Ron Levy – Army TF  
Jim Pastorick – Geophex  
Michelle Beekman – MES

## **ADEM General Comments**

*COMMENT 1. Section 5.0 Alternatives Considered: Please include a “Response Action Alternatives” table which includes identification (i.e. Alternative 1 - No Further Action, Alternative 2 – Area Specific Land Use Controls, etc.) and description of each response action. The description of each alternative should include all appropriate requirements for that alternative along with any deed notices, land use controls, specific responsibilities, etc. remaining with that property.*

RESPONSE 1. Table 2 incorporating this information has been added in Section 5.

*COMMENT 2. Section 9.0 Description of Selected Remedies, second paragraph: The sentence “the selected alternatives will provide significant protection to public safety and the human environment” is unclear in this paragraph. Does the “selected alternatives” refer to both the No Further Action area as well as the Clearance to Depth areas? Or is it referring only to the response actions for the Clearance to Depth areas? Please clarify this sentence.*

RESPONSE 2. The sentence has been revised to: “Alternative 1 – No Further Action selected for approximately 402 acres, and Alternative 6 – Clearance to Depth selected for the M6 – 1L Suspect Area – I/AR, M5 – 1L (South) PR, and M5 – 1L – I sectors will provide significant protection to public safety and the human environment.”

*COMMENT 3. Appendix A, Responsiveness Summary: Please reference the document title, document date, and comment date which the responsiveness summary is referring to.*

RESPONSE 3. This information has been added to Appendix A.

*COMMENT 4. Appendix A, Responsiveness Summary: In Response to part “a” of Mr. Oxley’s comment, the JPA explains the selected Clearance to One Foot Depth remedial alternative. The given explanation states that “this alternative will include a deed restriction that prohibits digging in the study area without construction support by UXO-qualified personnel.”*

*The Army’s Alpha Area EE/CA states that the clearance to one foot alternative will include deed restrictions to prohibit digging without construction support. However, it appears there could be some problems associated with the JPA’s ability to provide construction support in the future. Recently, special agreements were made regarding construction support in the M1.01, M3, and the “Y” Area. During the discussions leading up to these agreements, the Army conveyed its position that it does not aim to provide construction support in all areas considered cleared of Munitions and Explosives of Concern (MEC). Additionally, it is stated in the Army’s Draft Bravo Area EE/CA dated December 2004 (currently under review by the Department), that construction support will only be provided “in some areas” which are cleared to one foot.*

*It is unclear to the Department if construction support will be provided by the Army or the*

*JPA after the one foot clearances in the Alpha Area. Please clarify if the JPA intends to include the deed restriction that no digging can be done without construction support in areas cleared to one foot, and who (Army, JPA, other) will provide the construction support..*

RESPONSE 4. All properties that are contaminated with UXO that have not been cleared to depth for unrestricted land use will be conveyed to new landowners with a deed restriction prohibiting digging without construction support by UXO-qualified personnel. The responsibility for obtaining construction support will rest with the property owner. This information has been added to the Responsiveness Summary for clarification.

*COMMENT 5. Appendix A, Responsiveness Summary: In response to part “b” of Mr. Oxley’s comment, the JPA states that after the removal action phase is completed, recurring reviews will be conducted every five (5) years to ensure that public health and safety and the environment are being protected by the response actions. Please include in the response who or what entity will be responsible for these recurring five year reviews and who will be providing long term operation and maintenance of remedies.*

RESPONSE 5. Recurring five year reviews and any necessary long-term operation and maintenance of remedies (i.e., engineering controls) will be the responsibility of the JPA. After the JPA is abolished, the responsibility will be transferred to the City of Anniston. Recurring reviews and long-term operation and maintenance will be performed for a period of up to 20 years following the completion of all clearance actions in the Alpha Area. The recurring reviews will only be performed for those areas where the munitions response alternative implemented is Land Use Controls, Construction Support, Surface Clearance, or Clearance to One Foot. Recurring reviews will not be performed in areas where the munitions response alternative implemented is No Further Action or Clearance to Depth. This information has been added to the Responsiveness Summary for clarification.

### **ADEM Specific Comments**

*COMMENT 1. Section 9.0 Description of Selected Remedies: In the first paragraph of this section, please insert “Alternative 1” in front of “No Further Action”. In the second paragraph, please insert “Alternative 6” in front of “Clearance to Depth”. This labeling should be carried throughout the document, where appropriate.*

RESPONSE 1. The recommended changes have been incorporated in Section 9 and Section 10.

*COMMENT 2. Section 10.0 Trade Off Analysis, first sentence: Please include which areas of McClellan are referred to in this section.*

RESPONSE 2. The specific areas referred to in this sentence have been added for clarity.

*COMMENT 3. Section 10.0 Trade Off Analysis, first sentence: Recommend replacing “...are the best alternatives...” with “...are the best response actions...”*

RESPONSE 3. The recommended change has been made.

*COMMENT 4. Section 12.0 Responsiveness Summary: Please spell out the full document title and date of the Army EE/CA referred to in this paragraph.*

RESPONSE 4. The full document title and date have been added in both Section 1 and Section 12.

*COMMENT 5. Figure 2 and Figure 3, Munitions Response Actions for Alpha Area: Please highlight and label the areas referred to in this document (M5-1L Industrial, M5-1L South – PR, M6-1L Suspect Area – I/AR, etc.)*

RESPONSE 5. Figure 2 and Figure 3 were revised to highlight the M5-1L-I, M5-1L South – PR, and M6-1L Suspect Area – I/AR sectors.

### **Transition Force Comments**

*COMMENT 1. The information provided in the table below for the NFA areas should be incorporated into the Action Memorandum for clarity and completeness.*

<i>Sector</i>	<i>Description</i>	<i>Selected Munitions Response Alternative</i>	<i>Remarks</i>
<i>M5-1L-(North) PR</i>	<i>This sector consists of 110 acres in the southern portion of the Alpha Area.</i>	<i>No Further Action for 102 acres of this site.</i>	<i>Approximately 8 acres are within the 200 foot buffer boundary of M5-1L (South)-PR for which a clearance to depth is the selected munitions response action.</i>
<i>M6-1L Remainder-I/AR</i>	<i>This sector consists of 50 acres and forms the northern border of the Alpha Area.</i>	<i>No Further Action for 44 acres of this site.</i>	<i>Approximately 6 acres are within the 200 foot buffer boundary of M6-1L Suspect Area-I/AR for which a clearance to depth is the selected munitions response action.</i>
<i>M6-1M Remainder – PR</i>	<i>This sector consists of 292 acres in the north central portion of the Alpha Area.</i>	<i>No Further Action for 91 acres of this site.</i>	<i>Approximately 164 acres are currently being addressed in a Supplemental EECA.  Approximately 37 acres are within the 200 foot buffer boundary of M6-1M Transect Area 2 (North)-PR, M6-1M Burn Pit-PR and M6-1M Transect Area 1 (South)-PR for which munitions response actions have not yet been selected.</i>

<i>Sector</i>	<i>Description</i>	<i>Selected Munitions Response Alternative</i>	<i>Remarks</i>
<i>M6-1M Remainder-I/AR.</i>	<i>This sector consists of 102 acres in the northern portion of the Alpha Area.</i>	<i>No Further Action for 80 acres of this site.</i>	<i>Approximately 17 acres are currently being addressed a Supplemental EECA.</i>  <i>Approximately 5 acres are within the 200 foot buffer boundary of M6-1L Suspect Area-I/AR for which a clearance to depth is the selected munitions response action.</i>
<i>Smoke Ranges R and S/T-38-PR.</i>	<i>This sector consists of 88 acres along the western border of the Alpha Area.</i>	<i>No Further Action for 85 acres of this site.</i>	<i>Approximately 3 acres are within the 200 foot buffer boundary of M5-1L (South)-PR for which a clearance to depth is the selected munitions response action. .</i>

RESPONSE 1. A table incorporating this information has been added in Section 9.

*COMMENT 2. Section 1.0, Introduction, last paragraph, last sentence.*

*The sentence should state that the Action Memorandum will also need to be amended in the future to address the response actions that will be taken Sectors M6-1M Suspect Area (North)-PR, M6-1M Suspect Area (South)-PR, M6-1M Transect Area 1(South)-PR, M6-1M Transect Area 2 (North)-PR, and M6-1M Burn Pit-PR pending decisions regarding the modification of land uses.*

RESPONSE 2. This sentence has been revised to: “This Action Memorandum will be amended in the future based on the findings from the Supplemental EE/CA investigation and to address the response actions that will be taken in sectors M6-1M Suspect Area (North)-PR, M6-1M Suspect Area (South)-PR, M6-1M Transect Area 1(South)-PR, M6-1M Transect Area 2 (North)-PR, and M6-1M Burn Pit-PR as modified land uses are identified and phased in.”

*COMMENT 3. Section 2.0, Background, last paragraph, second sentence.*

*Insert “.....and M6-1M Remainder-I/AR”.*

RESPONSE 3. This sentence has been revised to: “Additional site characterization in the form of a Supplemental EE/CA is currently ongoing in portions of the M6–1M Remainder–PR and M6-1M Remainder I/AR sectors.”

**Final  
Engineering Evaluation and Cost Analysis (EE/CA)  
Action Memorandum  
Alpha Area Munitions and Explosives of Concern  
McClellan  
Anniston, Alabama**

**Prepared for:**

**Anniston Calhoun County Fort McClellan Development Joint Powers Authority,  
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**August 2005**

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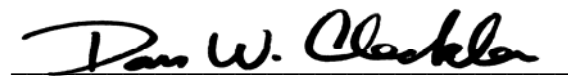
Figure 1	Munitions Response Areas
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## **FOREWORD**

This Engineering Evaluation and Cost Analysis (EE/CA) Action Memorandum document presents the selected munitions and explosives of concern (MEC) response actions for former Fort McClellan located in Calhoun County, Alabama. The Anniston – Calhoun County Fort McClellan Development Joint Powers Authority (JPA) is the lead agency and has developed this EE/CA Action Memorandum in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act as amended; and is consistent with the National Contingency Plan. The selection of MEC response actions is based on the information contained in the administrative record for this site. This document has been approved by the undersigned.



Dan Cleckler, Executive Director  
Anniston – Calhoun County Fort McClellan Development  
Joint Powers Authority



## **1.0 INTRODUCTION**

The purpose of this Action Memorandum is to document the Anniston – Calhoun County Fort McClellan Development Joint Powers Authority's (JPA) decision regarding the selected risk – reduction alternatives to address munitions and explosives of concern (MEC) in the Alpha Area at McClellan, Alabama. The response actions described in this Action Memorandum are based on the Final Engineering Evaluation/Cost Analysis Alpha Area of the Redevelopment Area Fort McClellan, Alabama (Tetra Tech, FW Inc., September 2003) (Army EE/CA) and on input from stakeholders and are documented in the Administrative Record. As the primary decision document, the Action Memorandum becomes a critical component of the Administrative Record, required by Section 113(k) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

McClellan, formerly known as Fort McClellan, is an 18,929-acre site located in Calhoun County, Alabama and was used by the Department of the Army for ordnance and chemical weapons training and other military exercises. In September 1999, McClellan was closed under Base Realignment and Closure (BRAC) as recommended by the 1995 Defense Base Closure and Realignment Commission in conformance with Public Law 101-510 as amended, the Defense Base Closure and Realignment Act.

Under CERCLA Section 9620(h)(3)(C), Federal property may be transferred prior to the completion of all remedial action necessary to protect human health and the environment. Acting in accordance with this early transfer authority, portions of McClellan were transferred in September 2003 to the local reuse authority (JPA), which assumed responsibility for certain environmental and munitions response activities. The Environmental Services Cooperative Agreement No. DASW01-03-2-0001 between the Department of the Army (Army) and JPA, and Cleanup Agreement No. AL4 210 020 562 between JPA and Alabama Department of Environmental Management (ADEM) memorializes the early transfer agreements and responsibility for environmental cleanups. These documents require that the JPA conduct a Supplemental EE/CA in portions of the Alpha Area, prepare an Action Memorandum, and conduct munitions response actions in select areas of McClellan (i.e., Alpha Area) in accordance with a Department of Defense Explosive Safety Board (DDESB) – approved Explosive Safety Submission (ESS). The JPA subsequently must obtain approval from ADEM that the required munitions response actions are complete.

There are three munitions response sites at McClellan (Figure 1). These have been grouped for geographical, explosive hazards and future reuse purposes into the Alpha, Bravo, and Charlie Areas. The Charlie Area has been transferred by the Army to the Department of Interior for use as a National Wildlife Refuge and the Army has retained responsibility for the munitions response required for this area. The Bravo Area has been transferred to the JPA; however the transfer of responsibility for munitions response actions has not yet been transferred to the JPA, but will likely occur in the future. The Alpha Area which is the subject of this document was transferred by the Army to the JPA in September 2003 with the responsibility for completing any required munitions response actions.

An EE/CA was conducted by the Army for the Alpha Area to characterize unexploded ordnance (UXO) concentrations and locations, study risk management alternatives, recommend response action alternatives, and document the selected alternatives for various areas. The Army EE/CA recommendations included No Further Action (NFA), Clearance to 1 Foot, and Clearance to Depth. The alternatives were selected based upon the proposed land use as reflected in the JPA's 1997 Comprehensive Reuse Plan as amended by the JPA's Reuse Map dated March 2002. The JPA is currently conducting a Supplemental EE/CA on approximately 180 acres located in the northern portion of the Alpha Area to support the selection of an appropriate response action in that area. This Action Memorandum will be amended in the future based on the findings from the Supplemental EE/CA investigation and to address the response actions that will be taken in sectors M6-1M Suspect Area (North)-PR, M6-1M Suspect Area (South)-PR, M6-1M Transect Area 1(South)-PR, M6-1M Transect Area 2 (North)-PR, and M6-1M Burn Pit-PR as modified land uses are identified and phased in.

## **2.0 BACKGROUND**

McClellan has documented its use as a military training area since 1912, when the Alabama National Guard used it for artillery training. However, the Choccolocco Mountains may have been used for artillery training as early as 1898 by the units stationed at Camp Shipp in the Blue Mountain Area during the Spanish American War. The 29th Infantry Division used areas of McClellan for training before being ordered to France during World War I. In 1917, Congress authorized the establishment of Camp McClellan. In 1929, the camp was officially designated as Fort McClellan. Before World War II, the 27th Infantry Division assembled at McClellan for training. During the war, many other units used the site for various training purposes. McClellan was put into inactive status in June 1947 following World War II, and was reactivated in January 1950. The site was used for National Guard training and was selected as the site for the Army's Chemical Corps School. McClellan was closed in September 1999.

The Alpha Area consists of approximately 930 acres in the north central portion of McClellan. The area is predominantly heavily to moderately wooded with mixed pines and hardwoods, with some open areas that were cleared for various activities during the active operation of the installation. The Alpha Area surrounds two active facilities, the Chemical Decontamination Training Facility (CDTF) and the Military Operations in Urbanized Terrain (MOUT). The CDTF is owned by the Department of Homeland Defense. The MOUT is currently owned by the Alabama National Guard. At this time, access to the Alpha Area is restricted and unused with the exception of the CDTF and MOUT sites.+

The Alpha Area was divided into thirteen sectors for the EE/CA evaluation as shown in Figure 2 and Table 1. The Army EE/CA investigation results indicated the presence of MEC in eight sectors. Two of the most contaminated sectors were designated M6-1M Transect Area 1 (South)-PR and M6-1M Transect Area 2 (North)-PR. These areas contained surface and subsurface MEC items consisting predominantly of 2.36-inch rockets, 60mm mortars and 3.5-inch rockets. These sectors consist mostly of forest with dense understory and rugged terrain and will likely remain as open space.

M6-1M Burn Pit – PR is located along the northeastern border of the Alpha Area. A 2-foot depression in this area containing MEC scrap from smoke grenades, flares, and small arms suggests the possible presence of a former burn pit or trench. The planned future land use in this area is open space.

**Table 1 – Alpha Area Sectors**

<b>Sector</b>	<b>Area (acres)</b>
M5 – 1L (North) – Passive Recreation (PR)	110
M5 – 1L (South) – PR	113
M5 – 1L – Industrial (I)	19
M6 – 1L Remainder – I/Active Recreation (AR)	50
M6 – 1L Suspect Area – I/AR	14
M6 – 1M Burn Pit – PR	3
M6 – 1M Remainder – I/AR	102
M6 – 1M Remainder – PR	291
M6 – 1M Suspect Area (North) – PR	6.3
M6 – 1M Suspect Area (South) – PR	4.6
M6 – 1M Transect Area 1 (South) – PR	66
M6 – 1M Transect Area 2 (North) – PR	63
Smoke Ranges R and S /T-38 – PR	88

M6 – 1L Suspect Area – I/AR is located along the northern boundary of the Alpha Area. During site characterization, two UXO items (practice grenade and smoke grenade) and six MEC scrap items were found. No high explosive items were found during the Army EE/CA investigation. The planned future land use in this area evaluated during the EE/CA was industrial and active recreation. The land use has subsequently been modified to industrial.

M6 – 1M Suspect Area (North) – PR is located in the north-central portion of Alpha along the north-facing slope of a steep hill. This area may have been used as a backstop for artillery firing exercises. Three UXO (3.5inch practice rockets) were found on the surface and several MEC scrap items were found on the surface to a depth of two inches. The planned future land use in this area is open space.

M6 – 1M Suspect Area (South) – PR is located along the western border of the Alpha Area. One UXO item (75mm projectile) was found at a depth of 6 inches and another UXO item (3inch Stokes mortar) was found at a depth of 24 inches. The planned future land use in this area is part open space and part industrial.

M5 – 1L (South) PR is located along the southern border of the Alpha Area. One unfired 75mm HE projectile was found on the surface and two UXO items (3.8inch projectile, shrapnel and a 4inch Stokes mortar, white phosphorous) were found on the surface. Several MEC scrap items were found primarily on the surface to a depth of 24 inches. The planned future land use in this

area as evaluated in the Army EE/CA was recreation but has subsequently been modified to business/office/industrial.

M5 – 1L – I is a triangular-shaped area located along the southwestern border of the Alpha Area. During the Army EE/CA, one UXO item (livens, projector, FM smoke) and seven MEC scrap items were found on the surface. The planned future land use in this area is industrial.

In the remainder of the Alpha Area mostly small arms and small concentrations of MEC scrap were found. Additional site characterization in the form of a Supplemental EE/CA is currently ongoing in portions of the M6–1M Remainder–PR and M6-1M Remainder I/AR sectors. A No Further Action for the remaining portions of the Alpha Area was granted by ADEM on September 30, 2003 (see Figure 3).

### **3.0 STATEMENT OF BASIS AND PURPOSE**

Prospective beneficial uses of the Alpha Area have been identified and prioritized for reuse under the BRAC process. The purpose of this EE/CA Action Memorandum is to present the selected munitions response actions for those areas prioritized for early redevelopment within the Alpha Area. Specifically, this Action Memorandum addresses munitions response actions for the M6 – 1L Suspect – I/AR, M5 -1L – I, and M5 -1L (South) PR sectors with confirmed MEC contamination and those areas identified for No Further Action. This Action Memorandum will be amended in the future based on the findings from the JPA's Supplemental EE/CA investigation and as modified land uses are identified and phased in. The land uses may be modified based on development absorption rates, marketing and other economic drivers.

Based on the results of the Army EE/CA Report (Tetra Tech, FW Inc., September 2003), which included a qualitative baseline risk evaluation and comparative analysis of potential munitions response actions, the most appropriate alternative was selected. Potential land uses in the Alpha Area that were considered in the EE/CA included passive recreation, active recreation, and industrial. Recommendations in this Action Memorandum take into account the JPA's current land use redevelopment plan, the degree of public usage and the types of items found during the site characterization.

As a result of the comprehensive evaluation of alternatives, No Further Action was selected as the most appropriate and sole munitions response action for approximately 402 acres of the Alpha Area. This selection was primarily driven by the absence of hazardous MEC contamination within the area. This alternative does not impose any land use controls; however, it will include a deed notice in the property transfer documents that informs future property owners of the historical military use and provides notification procedures in the event a MEC item is discovered.

Clearance to Depth was selected as the recommended response for the M6 – 1L Suspect Area – I/AR sector based on the original projected land use as industrial and active recreational. It is currently planned for industrial use. The recommendations also included a provision for a 200-foot buffer area clear of UXO to ensure that the complete target and firing miss zones were

identified and cleared. Clearance to Depth was also selected as the recommended response for the M5 – 1L – I sector based on the projected future land use as industrial.

The Army EE/CA recommended Clearance to 1 Foot as the munitions response for the M5 – 1L (South) PR sector based on a projected passive recreation land use. However, the JPA plans to develop the M5 – 1L (South) PR sector for business/office/industrial use. To ensure public safety in the M5 – 1L (South) PR sector the most appropriate munitions response is Clearance to Depth. A 200-foot buffer clear of UXO will also be identified to ensure that the complete target and firing miss zones were identified and cleared. This response action is protective for the intended land use.

Engineering security controls (signage, gates, berms, fencing, and patrols) are currently in place to prohibit access to the Alpha Area and reduce the potential for MEC exposure. As the removal actions are completed and redevelopment proceeds, the engineering security controls will be adapted to continue to limit access to MEC contaminated areas while allowing beneficial reuse to take place.

The process for munitions response action selection is documented in the Administrative Record for the site. The project Administrative Record, which includes the Archives Search Report and other pertinent project documents, is maintained at two locations. The records are available for public access at:

Anniston Calhoun County Public Library  
Reference Section  
108 East 10<sup>th</sup> Street  
Anniston, Alabama 36201  
Point of Contact: Ms. Sunny Addison  
Telephone: (256) 237-8501

Houston Cole Library  
9<sup>th</sup> Floor  
Jacksonville State University  
700 Pelham Road, North  
Jacksonville, Alabama 36265  
Point of Contact: Ms. Paula Ellis-Barnett  
Telephone: (256) 782-5249

## **4.0 PROJECT JUSTIFICATION**

A variety of material potentially presenting an explosive hazard (MPPEH) was recovered during the Army EE/CA field investigation conducted at McClellan. MEC items ranged in size from a grenade to a 75mm projectile. Portions of McClellan are now being released to the public and private sectors for reuse. This, combined with the presence of MEC items, is justification for the removal action at this site.

The data collected during the Army EE/CA field investigation was used to perform a qualitative risk evaluation for assessing the MEC risk to public safety and the environment. The qualitative risk analysis was completed based on the U.S. Army Corps of Engineers, Engineering and Support Center Huntsville (USAESCH) Ordnance and Explosives Risk Impact Assessment (OERIA) evaluation tool. This tool qualitatively evaluates three primary risk factors: 1) presence of OE, 2) site characteristics, and 3) human factors. A detailed discussion of the OERIA is presented in the Army EE/CA (Tetra Tech FW, Inc., September 2003).

## **5.0 ALTERNATIVES CONSIDERED**

Six non-time critical MEC response action alternatives were developed and evaluated for each of the sectors where a public safety risk associated with MEC was identified. The response action alternatives are described in Table 2.

**Table 2 – Munitions Response Action Alternatives**

<b>Alternative</b>	<b>Description</b>
Alternative 1 – No Further Action	The No Further Action alternative involves no additional action at the site. This alternative does not impose any land use controls (i.e., as described below for Alternative 2). An Explosives Safety Submission would be submitted to DDESB for approval.
Alternative 2 – Land Use Controls	No clearance action will be conducted. Site-specific land use controls may consist of one or more institutional or engineering controls tailored to an area. Institutional controls considered included: a community education program; a deed notice filed with the property transfer documents that informs future owners of the military history of the site and provides notification procedures in the event a MEC item is discovered, and a deed restriction that prohibits digging in the area without construction support by UXO-qualified personnel. Engineering controls considered included: fences, gates, signage, and security patrols. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.
Alternative 3 – Construction Support	This alternative includes providing clearance of MEC items in designated areas where intrusive building activities are planned. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.
Alternative 4 – Surface Clearance	This alternative involves removal of surface MEC items from the site. This alternative includes a deed restriction that prohibits digging in the area without construction support by UXO-qualified personnel. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.
Alternative 5 – Clearance to 1 Foot	This alternative involves removal of MEC items on the surface to a depth of 1 foot. This alternative includes a deed restriction that prohibits digging in the area without construction support by UXO-qualified personnel. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.
Alternative 6 – Clearance to Depth	This alternative involves continued investigation (i.e., excavation) of a suspect anomaly until the source of the anomaly is found and removed. The clearance depth is not limited. An Explosives Safety Submission would be submitted to DDESB for approval.

## **6.0 HIGHLIGHTS OF COMMUNITY PARTICIPATION**

A public meeting was held by the Army on March 18, 2003, at McClellan to present the conclusions and recommendations of the Draft – Final EE/CA to the public and solicit comment. The formal 30-day public review period occurred between March 3, 2003 and April 2, 2003. The public comments were primarily related to land use controls and the depth of clearance. The Responsiveness Summary (Appendix A), documents the written comments received from the meeting attendees and the Army's consideration of those comments.

## **7.0 COORDINATION SUMMARY**

Project activities for the Alpha EE/CA were coordinated with USAESCH, ADEM, EPA, and JPA through the BRAC Cleanup Team (BCT). The work plan and Army EE/CA Report were reviewed by USAESCH and ADEM and made available to project stakeholders, including the public. Regulatory acceptance of the findings of the EE/CA is considered in the final recommendations of the alternatives presented in this Action Memorandum.

## **8.0 SELECTION CRITERIA**

The selection criteria used to evaluate the six response action alternatives consist of effectiveness in reducing the public safety risks, the implementability of the alternative, and the cost of implementing the alternative. These criteria are discussed further in Section 7 and Section 8 of the Army EE/CA available at the public repositories mentioned above.

## **9.0 DESCRIPTION OF SELECTED REMEDIES**

MEC response action alternatives were evaluated for each of the sectors that were investigated during the Army EE/CA. As a result of the comprehensive evaluation of alternatives by sector, Alternative 1 – No Further Action was recommended for approximately 402 acres (see Figure 3 and Table 3). This response will also include a deed notice in the property transfer documents that informs future property owners of the historical military use and provides notification procedures in the event a MEC item is discovered.

The recommended response action for the M6 – 1L Suspect Area – I/AR, M5 – 1L (South) PR, and M5 – 1L – I sectors is Alternative 6 – Clearance to Depth (Figure 3 and Table 3). Residual risk that may remain will be managed through the inclusion of a deed notice in the property transfer documents that informs future property owners of the historical military use and provides notification procedures in the event a MEC item is discovered. Alternative 1 – No Further Action selected for approximately 402 acres, and Alternative 6 – Clearance to Depth selected for the M6 – 1L Suspect Area – I/AR, M5 – 1L (South) PR, and M5 – 1L – I sectors will provide significant protection to public safety and the human environment. Primary drivers of the selection were the distribution of MEC, accessibility of the site, and planned future land use.

**Table 3 – Selected Munitions Response Action Alternatives**

<b>Sector</b>	<b>Description</b>	<b>Selected Munitions Response Action Alternative</b>	<b>Remarks</b>
M5-1L-(North) PR	This sector consists of 110 acres in the southern portion of the Alpha Area.	No Further Action for 102 acres of this sector.	Approximately 8 acres are within the 200-foot buffer boundary of M5-1L (South)-PR for which a Clearance to Depth is the selected munitions response action.
M6-1L Remainder-I/AR	This sector consists of 50 acres and forms the northern border of the Alpha Area.	No Further Action for 44 acres of this sector.	Approximately 6 acres are within the 200-foot buffer boundary of M6-1L Suspect Area-I/AR for which a Clearance to Depth is the selected munitions response action.
M6-1M Remainder – PR	This sector consists of 291 acres in the north central portion of the Alpha Area.	No Further Action for 91 acres of this sector.	Approximately 164 acres are currently being addressed in a Supplemental EECA.  Approximately 37 acres are within the 200-foot buffer boundary of M6-1M Transect Area 2 (North)-PR, M6-1M Burn Pit-PR and M6-1M Transect Area 1 (South)-PR for which munitions response actions have not yet been selected.
M6-1M Remainder-I/AR	This sector consists of 102 acres in the northern portion of the Alpha Area.	No Further Action for 80 acres of this sector.	Approximately 17 acres are currently being addressed a Supplemental EECA.  Approximately 5 acres are within the 200-foot buffer boundary of M6-1L Suspect Area-I/AR for which a Clearance to Depth is the selected munitions response action.
Smoke Ranges R and S/T-38-PR	This sector consists of 88 acres along the western border of the Alpha Area.	No Further Action for 85 acres of this sector.	Approximately 3 acres are within the 200-foot buffer boundary of M5-1L (South)-PR for which a Clearance to Depth is the selected munitions response action.
M6-1L Suspect Area-I/AR	This sector consists of 14 acres along the northern border of the Alpha Area.	Clearance to Depth	Clearance area will include a 200-foot buffer clear of UXO.
M5-1L-I	This sector consists of 19 acres along the southwestern border of the Alpha Area.	Clearance to Depth	Clearance area will include a 200-foot buffer clear of UXO.
M5-1L South-PR	This sector consists of 113 acres in the southern portion of the Alpha Area.	Clearance to Depth	Clearance area will include a 200-foot buffer clear of UXO.

## 10.0 TRADE-OFF ANALYSIS

Alternative 6 – Clearance to Depth recommended for the M6 – 1L Suspect Area – I/AR, M5 – 1L (South) PR, and M5 – 1L – I sectors and Alternative 1 – No Further Action recommended for the designated 402 acres are the best response actions as determined from the available historical



records and data gathered in support of the Final Army EE/CA Report. Mitigative measures will be implemented during the clearance actions to ensure that there is a minimal impact to any human, ecological or cultural resources.

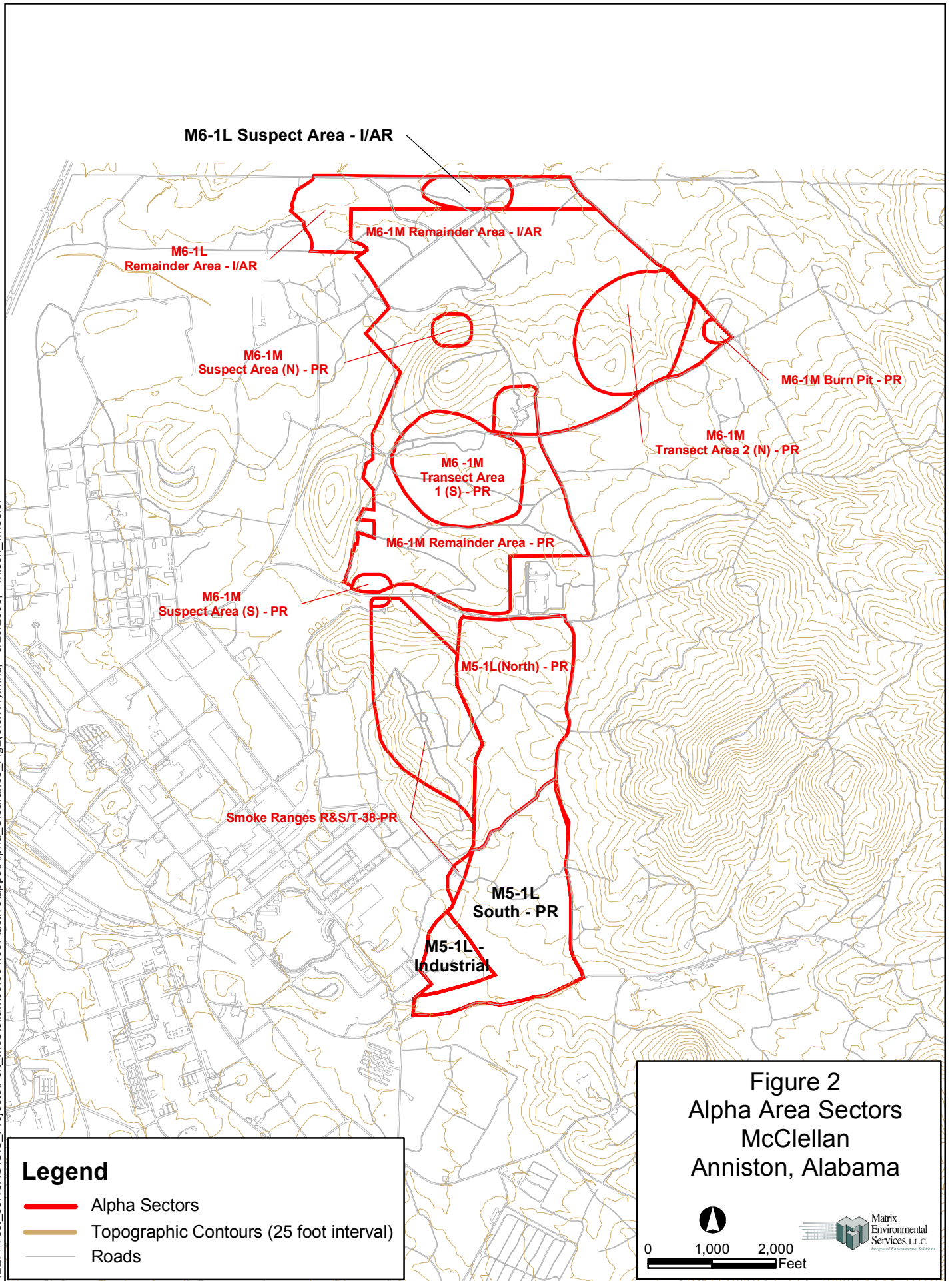
## **11.0 DOCUMENTATION OF SIGNIFICANT CHANGES**

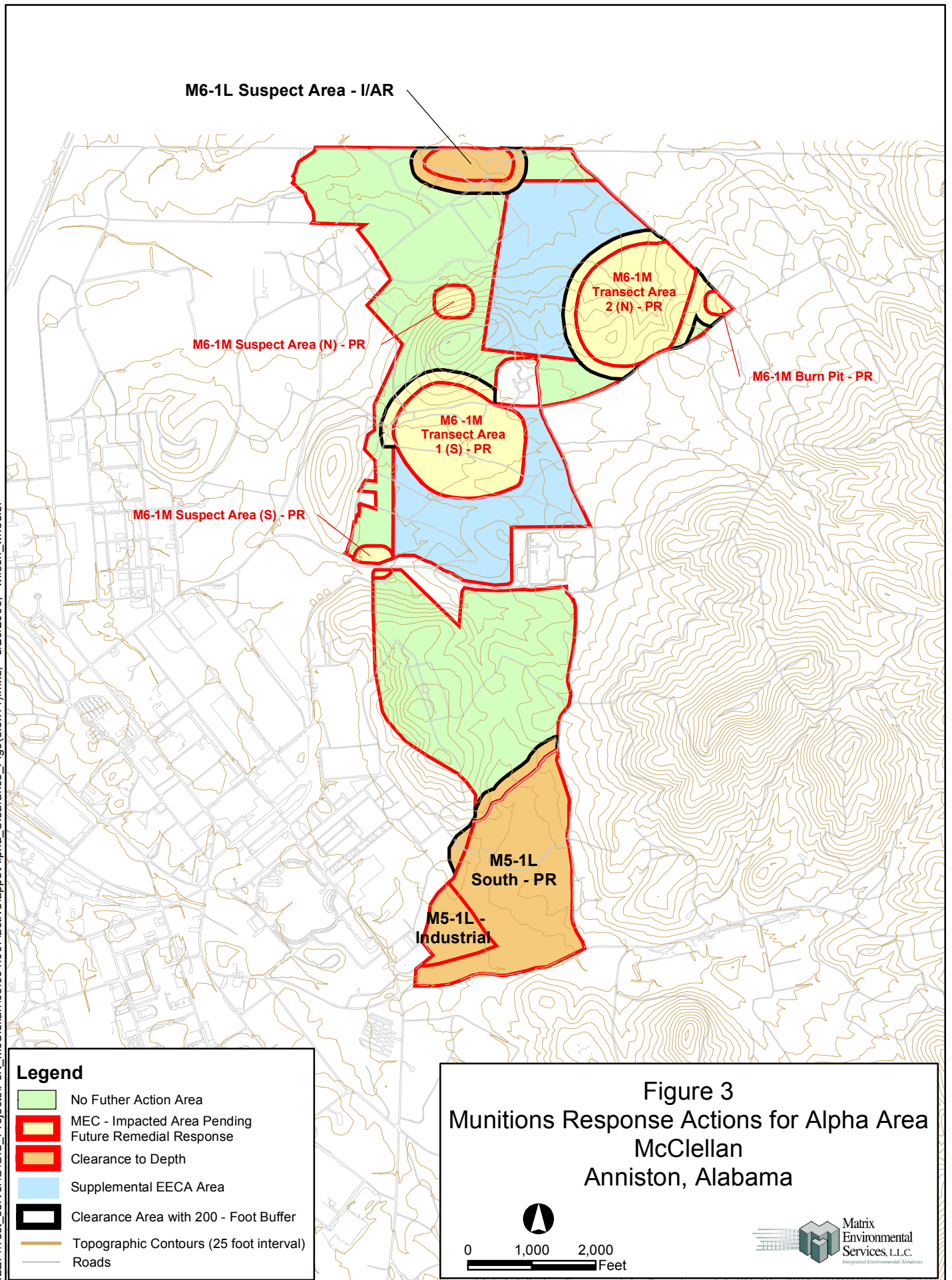
If the actions outlined in this EE/CA Action Memorandum are delayed or not taken, it could affect the redevelopment of the property and the potential exists for continued and substantial endangerment to public health or welfare. Response actions presented in this Action Memorandum are required to reduce/manage the risk to the future public users, including commercial or industrial workers and recreational users.

## **12.0 RESPONSIVENESS SUMMARY**

The responsiveness summary for the public meeting of March 3, 2003 on the Draft – Final Engineering Evaluation/Cost Analysis Alpha Area of the Redevelopment Area Fort McClellan, Alabama (Tetra Tech, FW Inc., February 2003) is provided in Appendix A.







## **Appendix A**

### **Responsiveness Summary**

The following written comments were provided on the Draft – Final Engineering Evaluation/Cost Analysis Alpha Area of the Redevelopment Area Fort McClellan, Alabama (Tetra Tech, FW Inc., February 2003) during the 30-day public review period between March 3, 2003 and April 2, 2003.

The following responses were prepared by the Army in 2003 except where indicated in brackets.

Mr. Charles K. Oxley  
1417 Danbury Lane  
Anniston, Alabama 36207

**Oxley-1 Comment:** The proviso for Alternative 5 regarding deed restrictions is insufficient. Either the local Deeds Registration or the U.S. Army needs to have in place a mandatory automatic notification procedure which will inform new and subsequent owners of the property of the restrictions and the reasons. Further the Anniston City Engineers, Development Office and Building Inspectors must list all this property with restrictions.

The one foot clearance is insufficient. Even though there is not frost action in this area, there is great movement of subsurface items. I remove rock and old metal from my yard on a yearly basis. If an active explosive device works to the surface and protrudes enough to trip over, ¼ - ½ inch, a child playing or a parent mowing may die.

**Response:**

The above comment includes 3 separate issues: a.) a comment on the land use controls associated with Alternative 5; b.) a comment on the effectiveness of Alternative 5; and c.) a comment concerning the land use for Alpha. The response to each part of the comment is included below.

a. Alternative 5, Clearance to a One Foot Depth, will include the surface and subsurface clearance of OE items to a depth of one foot. The depth of one-foot was selected based on site-specific information, future land use, and type of ordnance items that have been found in the vicinity and that may be present within the study area, and typical penetration depths for the types of OE items that may be present. This alternative also includes a deed restriction that prohibits digging in the study area without construction support by UXO-qualified personnel.

[JPA - All properties that are contaminated with UXO that have not been cleared to depth for unrestricted land use will be conveyed to new landowners with a deed restriction prohibiting digging without construction support by UXO-qualified personnel. The responsibility for obtaining construction support will rest with the property owner.]

All parcels of land that are transferred will include a deed notice in the property transfer documents that informs future property owners of the history of OE use and provides notification procedures in the event an OE item is discovered. The deed will also include a requirement for construction support should digging be required or land use change occurs. A community outreach program, as well as, an educational program is also currently being developed. These

activities include educational CDs and brochures. The recommended alternative in total including the safety buffer, the deed restriction and, the deed notice is considered protective.

b. All areas of Alpha were investigated for OE and the data were used to select an appropriate recommendation for each subsector. The selection of a Clearance to One Foot Depth is consistent with the approved re-use designated for many of the sectors in the Alpha Area based on the types of residual ordnance, depths of ordnance, residual density, risk determination, etc. Some sectors have OE densities or sensitivities, which warrant clearance to depth for the approved re-use, while other sectors have no OE or very low densities that do not warrant removal action based on the approved land re-use.

The processes and methodologies involved in conducting the EE/CA investigations cover many reviews of available data, aerial photographs, range records and range fan maps, interviews with current and former personnel and site reconnaissance prior to performing the actual OE sampling effort. The data gathered from the pre-sampling activities is used to focus the EE/CA sampling in order to define the sector boundaries between those areas with OE and those areas with none to limited and widely scattered OE items.

After the removal action phase is completed at Fort McClellan, recurring reviews will then be scheduled (at least every five years). Recurring reviews will be conducted at Fort McClellan to ensure that public health and safety, and the environment are being protected by the response actions that were implemented; verify the integrity of any site controls; evaluate sites for any additional OE exposures due to items working their way to the surface through time, determine if new information has become available; and to determine if there are any immediate threats to the public or environment that may require an additional response action.

[JPA - Recurring five year reviews and any necessary long-term operation and maintenance of remedies (i.e., engineering controls) will be the responsibility of the JPA. After the JPA is abolished, the responsibility will be transferred to the City of Anniston. Recurring reviews and long-term operation and maintenance will be performed for a period of up to 20 years following the completion of all clearance actions in the Alpha Area. The recurring reviews will only be performed for those areas where the munitions response alternative implemented is Land Use Controls, Construction Support, Surface Clearance, or Clearance to One Foot. Recurring reviews will not be performed in areas where the munitions response alternative implemented is No Further Action or Clearance to Depth. This information has been added to the Responsiveness Summary for clarification.]

c. The last sentence in the above comment states that “children playing or parents mowing” may be affected by this recommended alternative. This statement implies that the land will be used as residential. This is incorrect. The planned future land use for the areas recommended in the Alpha Area for Clearance to One Foot is Passive Recreation. Passive Recreation land use is associated with hiking, walking, biking, etc.