



**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.

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,

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