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February 2, 2010

Ms. Julie Ange and Ms. Brandi Little  
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1400 Coliseum Boulevard  
Montgomery, AL 36110-2059

Mr. Tom Lederly—c/o Lisa Holstein  
US Army BRAC Division  
2530 Crystal Drive, Room 5000  
Taylor Bldg/NC3  
Arlington, VA 22202

Subject: Cleanup Agreement No. A14 210 020 562  
Transmittal of Final Engineering Evaluation and Cost Analysis (EE/CA) Action  
Memorandum Bravo Munitions Response Site MRS-4  
McClellan, Anniston, Alabama

Dear Ms. Ange and Mr. Lederle:

This letter is sent to forward copies of the Final Engineering Evaluation and Cost Analysis (EE/CA) Action Memorandum (AM) Bravo Munitions Response Site -4, McClellan, Anniston, Alabama for your review on behalf of the Calhoun County McClellan Development Authority. Our response to ADEM comments on the Draft Final AM is 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: Lisa Holstein – Army TF  
Scott Bolton – Army TF  
Jim Pastorick - UXO Pro

## **ADEM Comments**

*COMMENT 1. According to Section 9, the selected remedy for property planned for future development is Alternative 6 – Clearance to Depth of Detection and Alternative 2 – Land Use Controls. However, only Alternative 6 is recommended in Section 3 as the munitions response. Please add Alternative 2 to the recommendation in Section 3.*

RESPONSE 1. The text in Section 3 has been accordingly to read: “For those areas that will be actively developed a Clearance to Maximum Depth of Detection is selected as the recommended munitions response. In addition, a deed notice will be placed in the property transfer documents that informs future property owners of the historical military use and notification procedures in the event a MEC item is discovered and a deed restriction included which prohibits digging without MEC construction support by UXO-qualified personnel for those areas or structures that were not cleared (beneath roads, buildings, concrete foundations, etc.)”

*COMMENT 2. A deed notice stating the history of the site and notification procedures for any MEC (munitions and explosives of concern) found in the future is recommended for the area that will be cleared to depth of detection. Please explain why a deed restriction requiring construction support would not be warranted.*

RESPONSE 2. The text in Section 9 has been revised to include a deed restriction prohibiting digging without construction support by UXO-qualified personnel for those areas that were not cleared as beneath roads, buildings, concrete foundations, etc.

**Final  
Engineering Evaluation and Cost Analysis (EE/CA)  
Action Memorandum  
Bravo Munitions Response Site 4 (MRS-4)  
McClellan  
Anniston, Alabama**

**Prepared for:**

**Calhoun County McClellan Development Authority  
Anniston, Alabama**



**Prepared by:**



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**February 2010**

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## **FOREWORD**

This Action Memorandum document presents the selected munitions and explosives of concern (MEC) response actions for the former Fort McClellan located in Calhoun County, Alabama. Calhoun County McClellan Development Authority (MDA), the successor to the Anniston-Calhoun County Fort McClellan Development Joint Powers Authority (“JPA”),<sup>1</sup> is the lead agency and has developed this 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.



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Robin E. Scott, Executive Director  
Calhoun County McClellan Development Authority

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<sup>1</sup> In its August 22, 2008 Order dissolving the JPA, the Circuit Court of Calhoun County charged Calhoun County with “administering all funds and fiscal operations” and taking action concerning the development of Fort McClellan. The Order specifically states: “It is the intent and effect of this Order to place the County in the position that the JPA has maintained to this point. Nothing in this Order shall affect any contract heretofore entered into by the entity formerly known as the JPA. ... Nothing in this Order is intended to, nor shall it, impede, stall or disrupt the present development or environmental remediation of Fort McClellan or any contract or subcontract....”

## **1.0 INTRODUCTION**

The purpose of this Action Memorandum is to document the Calhoun County McClellan Development Authority's (MDA) decision regarding the selected risk – reduction alternatives to address munitions and explosives of concern (MEC) in the Bravo Munitions Response Area (MRA) at McClellan, Alabama. The response action described in this Action Memorandum is based on the Draft Engineering Evaluation/Cost Analysis Bravo Area of the Redevelopment Area Fort McClellan, Alabama (Tetra Tech, FW Inc., December 2004) (Army EE/CA). 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 (formerly the Anniston Calhoun County Fort McClellan Development Joint Powers Authority or JPA, and now the MDA), which assumed responsibility for certain environmental and munitions response activities. The Environmental Services Cooperative Agreement (ESCA) No. DASW01-03-2-0001 between the Department of the Army (Army) and the local reuse authority, and Cleanup Agreement No. AL4 210 020 562 between the local reuse authority and the Alabama Department of Environmental Management (ADEM) memorializes the early transfer agreements and responsibility for environmental cleanups. These documents require that local reuse authority conduct munitions response actions in select areas of McClellan (i.e., Alpha MRA and Bravo MRA) in accordance with a Department of Defense Explosive Safety Board (DDESB) – approved Explosive Safety Submission (ESS). The local reuse authority subsequently must obtain approval from ADEM that the required munitions response actions are complete.

There are three munitions response areas at McClellan (Figure 1). The MRAs have been grouped for geographical, explosive hazards and future reuse purposes into the Alpha, Bravo, and Charlie MRAs. The Bob Stump National Defense Authorization Act for Fiscal Year 2003 authorized the transfer of 7,759 acres from the Army to the Department of Interior to establish the Mountain Longleaf National Wildlife Refuge in the Charlie MRA. On October 23, 2003, the local reuse authority transferred an additional 1,257 acres to the Department of Interior to increase the refuge acreage to 9,016 acres. The Army has retained responsibility for the munitions response actions required in the Charlie MRA.

The Alpha MRA was transferred by the Army to the local reuse authority in September 2003 with the responsibility for completing any required munitions response actions. A Final Action Memorandum addressing munitions response in portions of the Alpha MRA has been previously submitted to ADEM and the Army.

The Bravo MRA was transferred to the local reuse authority in September 2003. In September 2005, the transfer of responsibility for munitions response actions for select munitions response sites (MRSs) in Bravo was also transferred to the MDA via an amendment to the ESCA. Those munitions response sites include the Industrial Access Road and its right-of-way, 38 acres in Planning Area 4 (Range 18), and Bains Gap Road. In August 2006, the transfer of responsibility for munitions response actions for MRS-1 located in Bravo was also transferred to the local reuse authority via an amendment to the ESCA. In September 2007, the transfer of responsibility for the remainder of the Bravo MRSs, including MRS-4 the subject of this Action Memorandum, was transferred to the local reuse authority via a new ESCA.

## **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.

Munitions Response Site-4 (MRS-4) is approximately 296 acres in size and is located south of Bains Gap Road in the eastern portion of the Bravo MRA east of MRS-2. MRS-4 is all contained within the Army EE/CA sector M4-1H Mixed Use Area – PR. Water Tank Construction Site C is located within MRS-4 and a clearance to depth was previously completed at this site by the Army. During the Army's EE/CA, 33 explosively hazardous MEC items were recovered in this sector. MEC were recovered on the surface and to a maximum depth of 21 inches. MEC items recovered included 37mm Projectile, HE, MKII; 40mm Grenade; Rifle Grenade, Smoke; Hand Grenade, M69, Practice; 75mm Projectile, Shrapnel, MKI; 81mm Mortar, HE, M43; 3in Stokes Mortars, MKI, Practice.

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

Prospective beneficial uses of the Bravo MRA have been identified and prioritized for reuse under the BRAC process. The purpose of this Action Memorandum is to present the selected munitions response action for a site prioritized for early redevelopment within the Bravo MRA.

Specifically, this Action Memorandum addresses munitions response actions for MRS-4 with confirmed MEC contamination.

Based on the results of the Army Draft Bravo EE/CA Report (Tetra Tech, FW Inc., December 2004), 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 Bravo MRA that were considered in the Army EE/CA included development, mixed business use, cultural, retail, active recreation, and passive recreation. Recommendations in this Action Memorandum take into account the MDA's current land use redevelopment plan, the degree of public usage and the types of munitions-related items found during the site characterization.

The MDA currently plans to develop portions of MRS-4 and leave the remainder undeveloped as McClellan Park System. For those areas that will be actively developed a Clearance to Maximum Depth of Detection is selected as the recommended munitions response. In addition, a deed notice will be placed in the property transfer documents that informs future property owners of the historical military use and notification procedures in the event a MEC item is discovered and a deed restriction included which prohibits digging without (MEC) construction support by UXO-qualified personnel for those areas or structures that were not cleared (beneath roads, buildings, concrete foundations, etc.). For those areas that will remain as McClellan Park System the recommended munitions response action is a Clearance to 1 Foot. A deed restriction will also be placed that requires the use of construction support/anomaly avoidance for any future excavations in the areas designated McClellan Park System. These recommended munitions response actions take into account the degree of public usage and types and depth of MEC items previously found in the area.

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's EE/CA field investigations conducted at McClellan. 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 a 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., December 2004).

## 5.0 ALTERNATIVES CONSIDERED

Six non-time critical MEC response action alternatives were developed and evaluated in the Bravo MRA where a public safety risk associated with MEC was identified. The response action alternatives are described in Table 1.

**Table 1 – 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	Construction support will be provided in accordance with U.S. Army Corps of Engineers guidance document EP 75-1-2, Munitions and Explosives of Concern (MEC) Support During Hazardous, Toxic, and Radioactive Waste (HTRW) and Construction Activities (August 1, 2004). This alternative may include on-call construction support, on-site construction support or footprint clearance 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 Maximum Depth of Detection	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**

The MDA conducts open monthly meetings to discuss issues pertinent to the redevelopment of McClellan. The MDA also conducts an annual open meeting to present the results of activities conducted during the past year and educate the public on the potential hazards of MEC. The MDA also participates at each quarterly Restoration Advisory Board meeting.

## **7.0 COORDINATION SUMMARY**

Project activities for the Bravo EE/CA were coordinated with USAESCH, ADEM, and MDA through the BRAC Cleanup Team (BCT). The work plan and Draft Army EE/CA report were reviewed by USAESCH and ADEM and made available to project stakeholders, including the MDA.

## **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.

## **9.0 DESCRIPTION OF SELECTED REMEDIES**

The recommended response action for MRS-4 where the area is slated for development is Alternative 6 – Clearance to Maximum Depth of Detection and Alternative 2 – Land Use Controls. Residual risk that may remain following the Clearance to Maximum Depth of Detection 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, provides notification procedures in the event a MEC item is discovered and includes a reference to online educational resources that can be used to educate future workers and inhabitants of the potential risks of unexploded ordnance and how to respond in the event a suspect munitions is encountered. In addition, for those areas or structures that were not cleared (beneath roads, buildings, concrete foundations, etc.) a deed restriction will be placed prohibiting digging without construction support provided by UXO-qualified personnel.

The recommended response action for MRS-4 where the land use is McClellan Park System is Alternative 5 – Clearance to 1 Foot and Alternative 2 – Land Use Controls. The majority of the area designated as McClellan Park System is very steep and undesirable for development. The steep slopes serve to limit the penetration depth of ordnance. The steep slopes also make digital geophysical mapping of these areas problematic and as such analog methods of metal detection will be employed rather than digital geophysical mapping in the McClellan Park System. The objective of the site-specific Land Use Controls is to minimize the potential for exposure to MEC. This will be achieved by education and a deed restriction that prohibits digging in this area without construction support provided by UXO-qualified personnel. The MDA conducts annual education UXO briefings to the public. These briefings describe the explosive hazards associated with munitions that may be present and the actions people should take (Recognize, Retreat, Report) should they encounter MEC or a suspected MEC item.

## **10.0 TRADE-OFF ANALYSIS**

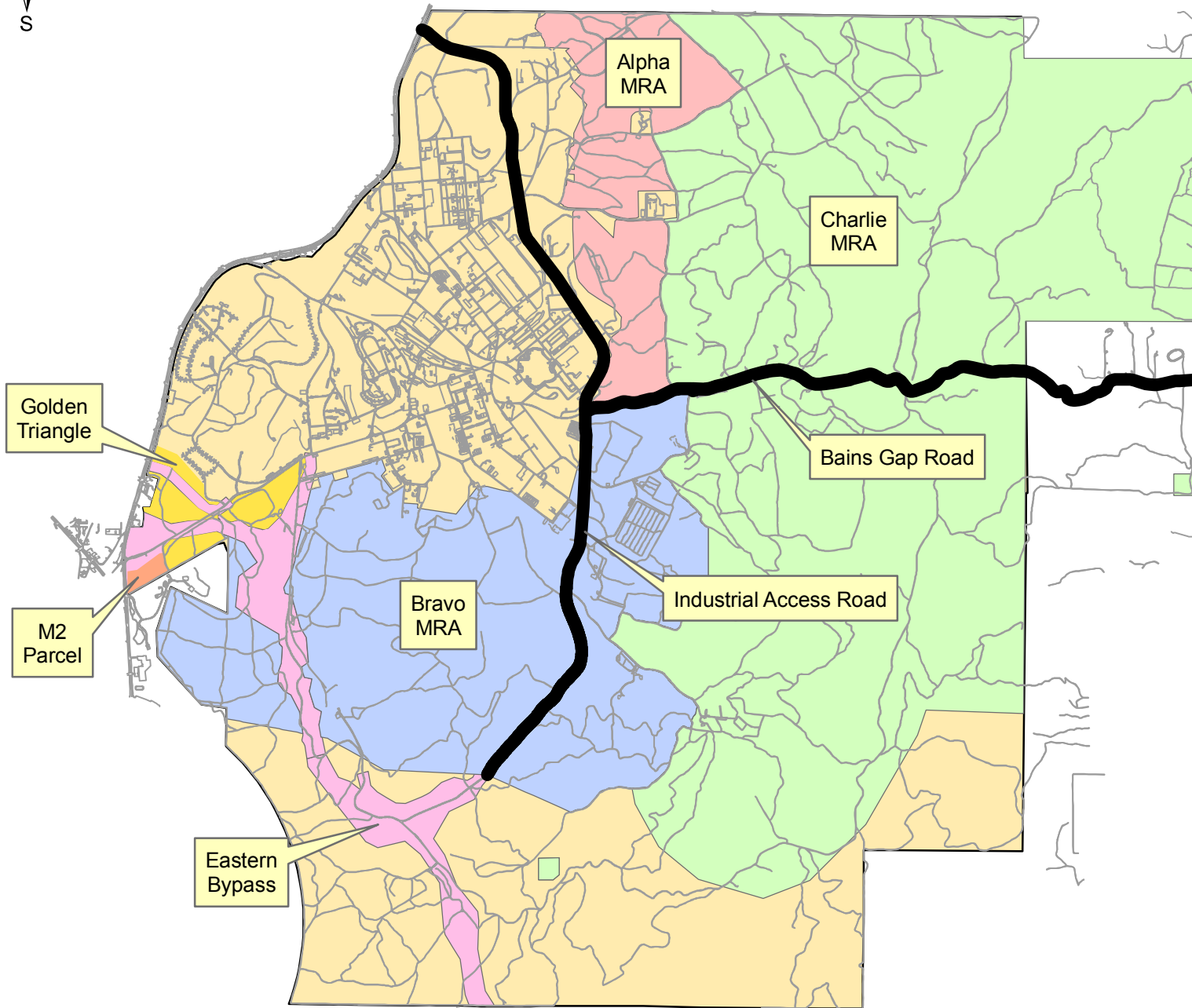
These response actions are the best response actions as determined from the available historical records, data gathered in support of the Army EE/CA investigation, and are compatible with the proposed land use. Mitigative measures will be implemented during the clearance actions to ensure that there is a minimal impact to any human, ecological or cultural resources.

## **11.0 DOCUMENTATION OF SIGNIFICANT CHANGES**

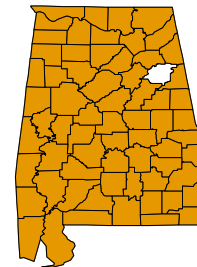
If the actions outlined in this Action Memorandum are delayed or not taken, it could affect the redevelopment of the property, delay road work and impact critical infrastructure upgrades. Response actions presented in this Action Memorandum are required to reduce/manage the risk to the future public users.

## **12.0 RESPONSIVENESS SUMMARY**

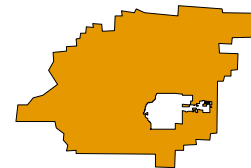
A responsiveness summary has not been compiled because there has not been a public meeting on the Army EE/CA.



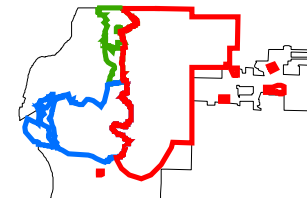
Alabama




Calhoun County



McClellan

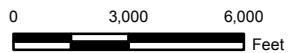


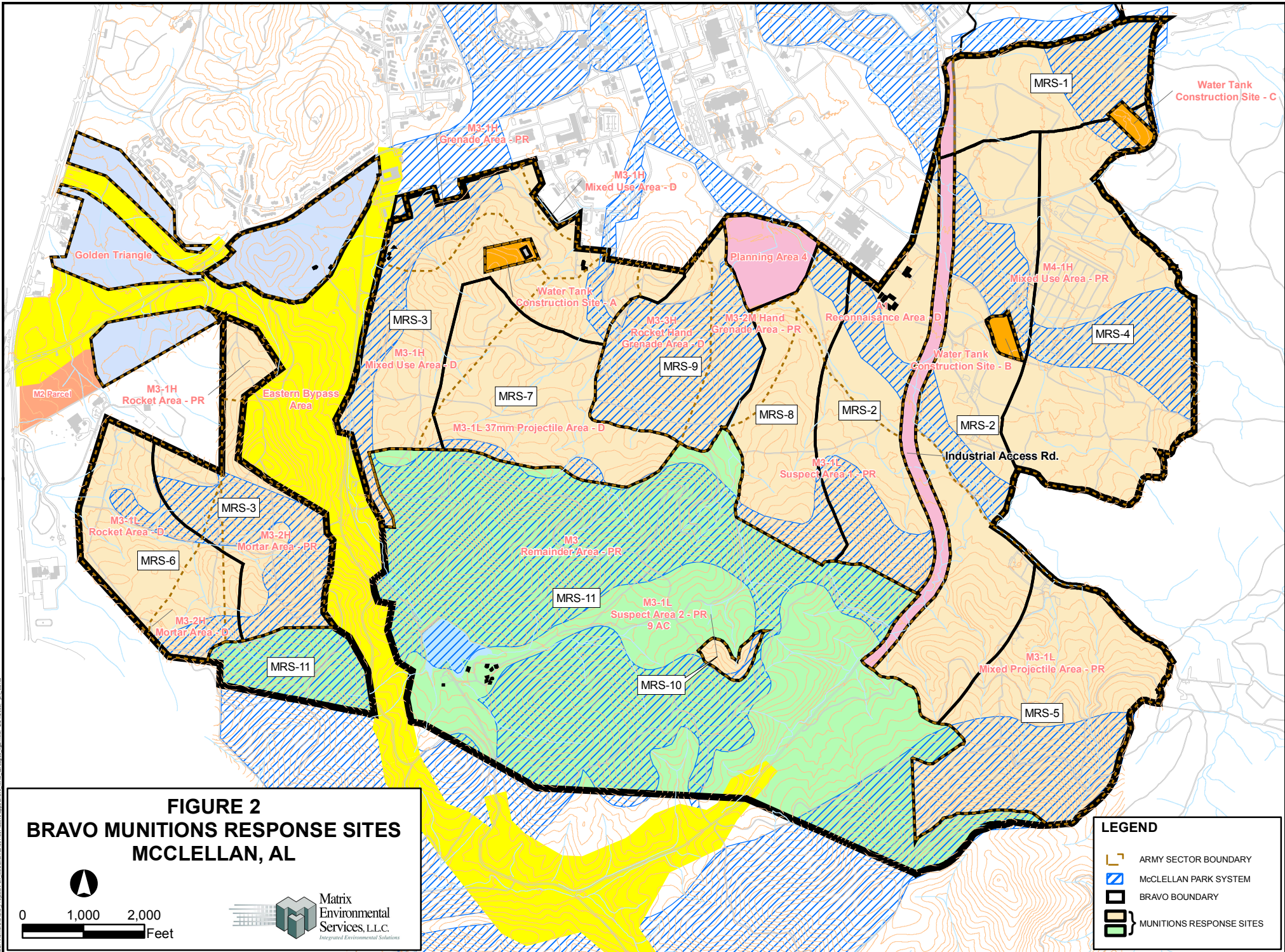
### Legend

-  Alpha Munitions Response Area
-  Bravo Munitions Response Area
-  Charlie Munitions Response Area
-  Golden Triangle
-  Eastern Bypass
-  M2 Parcel

**FIGURE 1**  
**Munitions Response Areas**

McClellan  
Munitions Response Site  
Anniston, Alabama





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