



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY GARRISON
FORT McCLELLAN, ALABAMA 36205-5000

March 21, 2001

Environmental Office

Mr. Doyle T. Brittain
U.S. Environmental Protection Agency (EPA), Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Dear Mr. Brittain:

I have enclosed the final version of the initial Appendix A to the Land Use Control Assurance Plan (LUCAP). This version was prepared after reviewing and considering comments from Alabama Department of Environmental Management (ADEM), EPA, and Anniston-Calhoun County Fort McClellan Development Joint Powers Authority (JPA). Comments on the draft Appendix A submitted by ADEM and EPA at the Base Realignment and Closure Cleanup Team's meeting on February 14 along with comments submitted by JPA and the Army's responses are at enclosure 2.

The LUCAP states decision documents will be used as the basis for final land use controls. In consideration of that requirement we removed some sites that were included in the draft Appendix A because there is no decision document on them at this time. Although the Base Realignment and Closure Cleanup Team has approved final land use controls on the sites, the signed decision document will serve as the basis for adding those sites to the Appendix A.

As prescribed in the LUCAP, we will update and distribute a revised Appendix A after issuance of a Record of Decision or other decision or source document to reflect any additions or deletions to the Appendix.

Please contact Ms. Karen Pinson at (256)848-6831 or E-mail karen.pinson@mcclellan.army.mil if you have comments or questions.

Sincerely,

Glynn D. Ryan
Site Manager

Enclosures

Copies Furnished:

Environmental Office, HQ TRADOC
BRAC Office, HQ TRADOC



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY GARRISON
FORT McCLELLAN, ALABAMA 36205-5000

March 21, 2001

Environmental Office

Ms. Miki Schneider
Anniston-Calhoun County Fort McClellan
Development Joint Powers Authority (JPA)
P. O. Box 5327
Fort McClellan, Alabama 36205-5000

Dear Ms. Schneider:

I have enclosed the final version of the initial Appendix A to the Land Use Control Assurance Plan (LUCAP). This version was prepared after reviewing and considering comments from Alabama Department of Environmental Management (ADEM), Environmental Protection Agency (EPA) Region 4, and the JPA. Comments on the draft Appendix A submitted by ADEM and EPA at the Base Realignment and Closure Cleanup Team's meeting on February 14 along with comments submitted by JPA and the Army's responses are at enclosure 2.

The LUCAP states decision documents will be used as the basis for final land use controls. In consideration of that requirement we removed some sites that were included in the draft Appendix A because there is no decision document on them at this time. Although the Base Realignment and Closure Cleanup Team has approved final land use controls on the sites, the signed decision document will serve as the basis for adding those sites to the Appendix A.

As prescribed in the LUCAP, we will update and distribute a revised Appendix A after issuance of a Record of Decision or other decision or source document to reflect any additions or deletions to the Appendix.

Please contact Ms. Karen Pinson at (256)848-6831 or E-mail karen.pinson@mcclellan.army.mil if you have comments or questions.

Sincerely,

Glynn D. Ryan
Site Manager

Enclosures

Copies Furnished:

Environmental Office, HQ TRADOC
BRAC Office, HQ TRADOC



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY GARRISON
FORT McCLELLAN, ALABAMA 36205-5000

March 21, 2001

Environmental Office

Mr. Philip Stroud
Alabama Department of Environmental Management (ADEM)
Hazardous Waste Branch, Land Division
P.O. Box 301463
Montgomery, Alabama 36130-1463

Dear Mr. Stroud:

I have enclosed the final version of the initial Appendix A to the Land Use Control Assurance Plan (LUCAP). This version was prepared after reviewing and considering comments from ADEM, Environmental Protection Agency Region 4 (EPA), and Anniston-Calhoun County Fort McClellan Development Joint Powers Authority (JPA). Comments on the draft Appendix A submitted by ADEM and EPA at the Base Realignment and Closure Cleanup Team's meeting on February 14 along with comments submitted by JPA and the Army's responses are at enclosure 2.

The LUCAP states decision documents will be used as the basis for final land use controls. In consideration of that requirement we removed some sites that were included in the draft Appendix A because there is no decision document on them at this time. Although the Base Realignment and Closure Cleanup Team has approved final land use controls on the sites, the signed decision document will serve as the basis for adding those sites to the Appendix A.

As prescribed in the LUCAP, we will update and distribute a revised Appendix A after issuance of a Record of Decision or other decision or source document to reflect any additions or deletions to the Appendix.

Please contact Ms. Karen Pinson at (256)848-6831 or E-mail karen.pinson@mcclellan.army.mil if you have comments or questions.

Sincerely,

Glynn D. Ryan
Site Manager

Enclosures

Copies Furnished:

Environmental Office, HQ TRADOC
BRAC Office, HQ TRADOC

LUCAP FINAL INITIAL APPENDIX A
FORT MCCLELLAN, ALABAMA
MARCH 2001

Site Name and Description from EBS (a)	EBS Parcel Label (a)	X,Y Coord (b)	Source or Decision Document
Former Post Garbage Dump(N. of Reilly Air Field)	126(7)	(24,50)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Landfill # 1. FTMC Landfill from 1945-1947.	78(6)	(10,32)	EBS 1998. SI Rpt Final 8/93. RI Rpt Final 7/00. EE/CA Fill Area Definition Work Plan Final 2/00.
Landfill # 2. FTMC Landfill opened at an unknown date and closed in 1947.	79(6)	(22,40)	EBS 1998. SI Rpt Final 8/93. RI Rpt Final 7/00. EE/CA Fill Area Definition Work Plan Final 2/00.
Landfill # 3. FTMC Landfill from 1946 to 1967.	80(6)	(18,48)	EBS 1998. SI Rpt Final 8/93. RI Rpt Final 7/00. EE/CA Fill Area Definition Work Plan Final 2/00.
Industrial Landfill	175(5)	(20,48)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Landfill # 4. FTMC Closed Sanitary Landfill 1967-1994,	81(5)	(19,46)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Fill Area north of Landfill No. 2.	230(7)	(24,42)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Fill Area, east end of Reilly Air Field.	227(7)	(24,50)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Fill Area NW of Reilly Air Field.	229(7)	(19,49)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Probable Fill Area at Range 30.	231(7)	(25,47)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Stump Dump, Central Main Post	82(7)	(30,32)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
Fill Area west of Range 19.	233(7)	(10,26)	EBS 1998. EE/CA Fill Area Definition Work Plan Final 2/00.
M1.01 Parcel for OE EE/CA	none	attached map	Master Conceptual Plan OE Response Final 1/01
Alpha Area for OE EE/CA	multiple	attached map	EBS 1998. ASR Final 7/99. Work Plan Alpha Area O&E Response Final 2/01. Master Conceptual Plan OE Response Final 1/01.
Bravo Area for OE EE/CA	multiple	attached map	EBS 1998. ASR Final 7/99. Work Plan Bravo Area O&E Response Draft 2/01. Master Conceptual Plan OE Response Final 1/01.
Charlie Area for OE EE/CA	multiple	attached map	EBS 1998. ASR Final 7/99. Master Conceptual Plan OE Response Final 1/01.
Training Area T-24A: Former Chemical Munitions Disposal Area	187(7)	(33,15)	EBS 1998. SI Rpt Final 8/93. ASR Final 7/99. RI Rpt Final 7/00. RI (Supplemental) Work Plan Final 9/00 Work Plan CWM Site EECA Final 9/00.
Training Area T-38: Former Technical Escort Reaction Area. Reservoir Ridge.	186(6)	(26,38)	EBS 1998. SI Rpt Final 8/93. ASR Final 7/99. RI Rpt Final 7/00. RI (Supplemental) Work Plan Final 9/00 Work Plan CWM Site EECA Final 9/00.

Key to LUCAP Appendix A









- a. Site name, description, and parcel label are taken from the EBS. In cases where the CERFA category (noted in parentheses after the parcel label) was changed after investigation of the parcel, the new category is noted in parentheses after the original CERFA category designation.
- b. Coordinates indicate locations on the CERFA Parcel Map Figure 1 and the Non-CERCLA Issues Map Figure 2 found in the EBS.

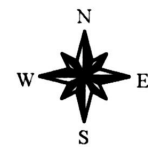
Acronyms:

ASR - Archives Search Report, Final, July 1999
CERCLA - Community Environmental Response, Compensation, and Liability Act
CERFA - Community Environmental Response Facilitation Act
CWM - Chemical Warfare Materiel
DPDO - Defense Property Disposal Office
EBS - Environmental Baseline Survey, Final, January 1998.
EE/CA - Engineering Evaluation, Cost Analysis
EPIC - Environmental Photographic Interpretation Center, U.S. Environmental Protection Agency photographic study
FTMC - Fort McClellan
LUC - Land Use Control
LUCAP - Land Use Control Assurance Plan
LUCIP - Land Use Control Implementation Plan
OE - Ordnance and Explosives
RI - Remedial Investigation
SI - Site Investigation
TBD - To be determined
UST - Underground Storage Tank

OE EE/CA Areas Alpha, Bravo, Charlie & M1.01

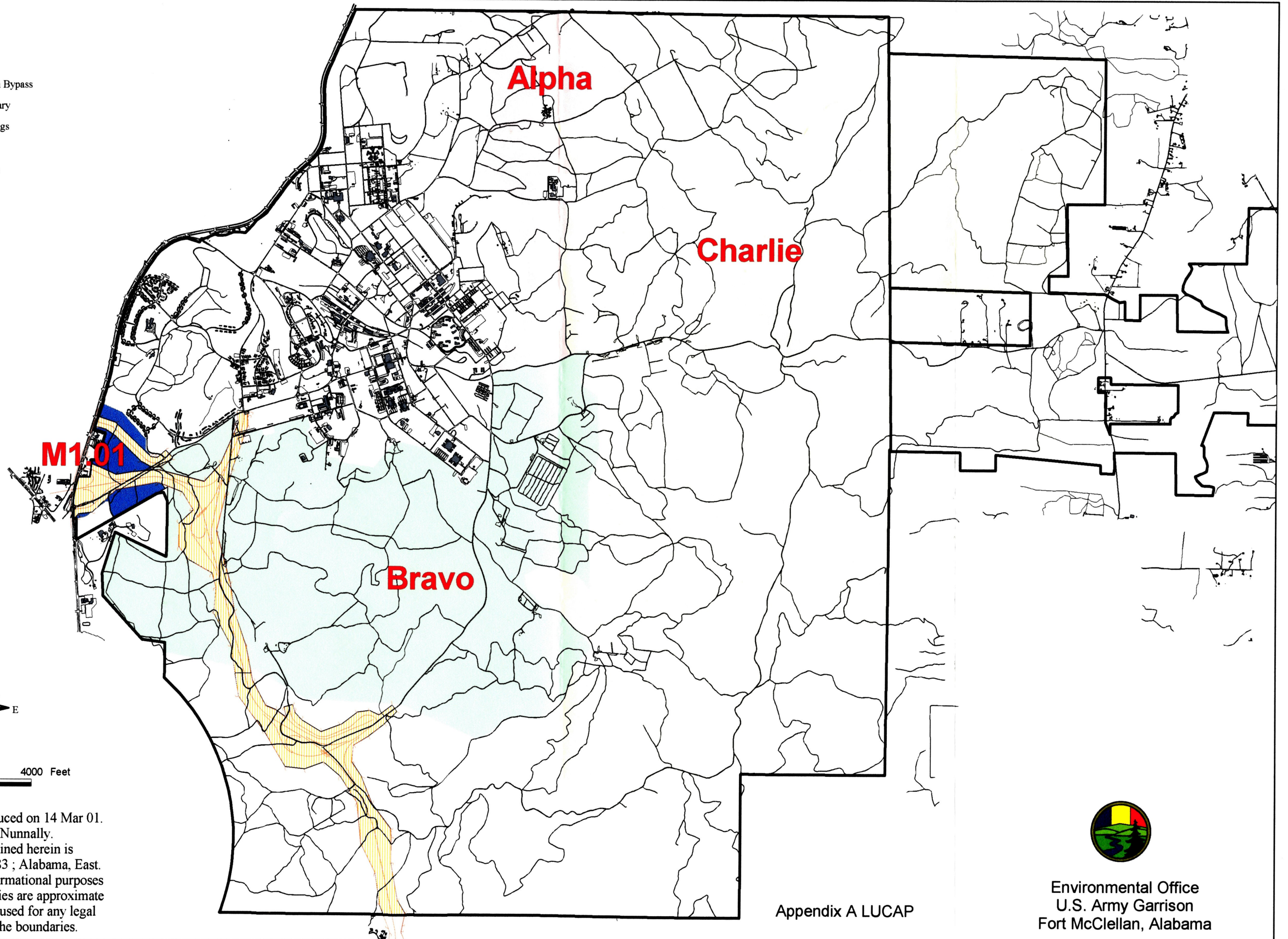
Legend

-  Roads
-  Eastern Bypass
-  Boundary
-  Buildings
-  M1.01
-  Charlie
-  Bravo
-  Alpha



0 2000 4000 Feet

This map was produced on 14 Mar 01.
By Jackie Nunnally.
All data contained herein is
in State Plane - 1983 ; Alabama, East.
This map is for informational purposes
Only. The boundaries are approximate
and should not be used for any legal
description of the boundaries.



Appendix A LUCAP



Environmental Office
U.S. Army Garrison
Fort McClellan, Alabama

Response to Comments from Alabama Department of Environmental Management
(ADEM) and Environmental Protection Agency Region 4 (EPA)
on
Draft Initial Appendix A of the Land Use Control Assurance Plan (LUCAP)

ADEM and EPA reviewed the Draft Appendix A and provided comments in the Base Realignment and Closure Cleanup Team's (BCT) monthly meeting held February 14, 2001, at Fort McClellan. Their comments, documented in the BCT minutes, and the Army's responses are provided below.

1. Based upon investigation of Former Smoke Area R, Environmental Baseline Survey (EBS) Community Environmental Response Facilitation Act (CERFA) parcel 105(6), remove Hazardous, Toxic, and Reactive Waste (HTRW) as an issue at this site.

FMC response: We removed the column titled "Issues" from the final Initial Appendix A. The final Initial Appendix A includes those elements required by the LUCAP - site name, description, and location as specified in the decision or source document, and the name and date of such document. The individual LUCIPs will address each site or area in more detail.

2. Based upon review of investigations and the Army's agreement to remove some contaminated soil within the GSA warehouse area, you may remove this site from Appendix A.

FMC response: The site is removed from the final initial Appendix A.

**Response to Comments from Anniston-Calhoun County Fort McClellan
Development Joint Powers Authority (JPA)
On
The Draft Initial Appendix A of the Land Use Control Assurance Plan (LUCAP)**

The JPA's comments were submitted to the Army in an E-mail dated March 5, 2001. Those comments and the Army's responses are provided below.

JPA: Thank you for meeting with me regarding Appendix A for Land Use Control Plan (LUCP). As we discussed there are a few items that I would request be revised on the chart as currently drafted those concerns are listed below. It is my understanding that some changes are being made to the January 24, 2001 document you sent to me. Please provide me with a revised copy to review.

FMC Response: We are revising the Draft Appendix A based upon comments from the Alabama Department of Environmental Management (ADEM), the Environmental Protection Agency Region 4 (EPA), JPA, and the Army. According to the LUCAP the Army shall respond to comments by the JPA and regulators before finalizing an initial Appendix A. The Army finalized its Initial Appendix A included in this package after considering those comments. We believe this revised and streamlined Appendix A along with our responses to your comments addresses many of your concerns.

JPA: Issues with LUCAP Draft Appendix A
The column titled "Parcel Label" should reference which document these identification numbers are taken from.

FMC Response: We will add "EBS" to the column title to indicate those parcel labels were identified in the *Environmental Baseline Survey January 1998* (EBS). The key attached to the Appendix A also addresses this issue.

JPA: The column titled "LUC Required" should be revised. Until the LUC has been approved should this title read "LUC Recommended".

FMC Response: After reviewing and considering comments and concerns with the content of the draft Appendix A, the final Appendix A will include only those elements required by the LUCAP - site name, description and location as specified in the decision or source document, and the name and date of such document. The Land Use Control Implementation Plan (LUCIP) for each area or site will address the specific areas or sites in more detail.

JPA: Size column- We have a concern with the acres that are identified as being impacted by the LUC's. Example on page 2 of 7 the last row; the column references 4,891 acres of land. Does this mean all 4,891 acres will be tied up in the LUC? We need to discuss the acres and how this chart will impact us.

FMC Response: The Army will manage **all** areas being investigated for ordnance and explosives (OE) under interim LUCs. The OE areas requiring LUCs are grouped into four areas shown on the map attached to Appendix A. The four areas will be investigated under four Engineering Evaluation/Cost Analyses (EE/CAs) covering OE issues. The JPA Parcel M1.01 will be addressed in the M1.01 Parcel EE/CA. The Alpha and Bravo Area EE/CAs will investigate OE issues in JPA parcels M5 and M6 (inclusive of M8) and the northern portion of JPA Parcels M3 and M4, respectively. The property slated for transfer to the U.S. Fish and Wildlife Service will be addressed within the Charlie Area EE/CA.

JPA: The word “predecisional” is used in the document but is not defined anywhere.

FMC Response: The column containing this word will not appear in the final Appendix A. The word “predecisional” means prior to a remedy decision reached under CERCLA.

JPA: On pages 1-5, it is my understanding the Army will provide an “Interim” LUC for all sites listed and the JPA will have the opportunity to respond to each sites report. Is this correct?

FMC Response: Yes. The final Initial Appendix A lists only sites requiring Interim LUCs.

JPA: The sites listed on pages 6-7 should be labeled “Draft Final”. You indicated that all of the sites under GSA warehouse have been deleted. Please make sure the revised Appendix A shows these sites deleted.

FMC Response: The final Initial Appendix A lists only those sites requiring Interim LUCs. The General Services Administration (GSA) warehouse site will be deleted from the final Initial Appendix A.

JPA: Landfills- Regarding the landfills listed on the chart, if the EE/CA has not been completed how is the LUCIP determined?

FMC Response: The LUCIPs written for the fill areas will document interim LUCs the Army determines are necessary to protect human health and the environment. The Army uses Interim LUCs to assist in managing its property during investigation and, if necessary, during cleanup phases. Interim LUCs are not based upon potential future reuse of property nor are they necessarily based upon CERCLA remedy decisions.

JPA: Overall, please keep in mind that the JPA intends for all LUC’s placed on property to be removed when the cleanup is completed. We do not intend for the Army to leave land with a LUC in perpetuity.

FMC Response: While the Army's desire is to transfer the land with as few encumbrances as possible, the reality is there will almost certainly be LUCs for some areas of Fort McClellan property. The signing Parties of the LUCAP agreed that for sites not meeting residential reuse requirements, LUCs would be employed to protect human health and the environment (LUCAP section III).

JPA: Once you receive this letter and have a chance to review it please contact me and I will be glad to meet with you.

FT. McCELLAN BCT MEETING MINUTES
PARTNERING SESSION #33
FT. McCELLAN, AL
FEBRUARY 13 – 14, 2001

AGENDA ITEM	RESPONSIBILITY	NOTES
Check In Guest Introduction and Roles	Host: Ellis Pope Leader: Recorder: Jeanne Yacoub	See Attendees List -- Attachment A.
Ground Rules	BCT	Attachment B provides the ground rules established in October, 1997.
Agenda	BCT	The BCT revised the February agenda, and proceeded accordingly. Attachment C provides the draft March agenda. Attachment D provides the February meeting summary.
Accept Previous Minutes	BCT	The team reviewed the draft January minutes, and accepted the minutes with revisions as final.
Action Items	BCT	Action items were reviewed and updated, as indicated in Attachment D.
Long-Term Planning (BCP)	BCT	One of the main agenda items for the June, 1999 meeting was BCP discussions. The team had set the BCP aside pending resolution of some policy issues that required resolution prior to completion of the BCP. Now that the team has worked through the LUCAP issue, they are prepared to readdress the BCP. IT will brief the BCT in March on the approach to the BCP. Attachment E provides the reporting and review schedule for the deliverables that will be part of the BCP master schedule.
Goals/Metrics Update	BCT	Goals and metrics remain on the agenda (Attachment C). The team began brainstorming this topic during the June, 1998 meeting, and also began development of preliminary goals for consideration by the group. Attachment

ATTACHMENT D
MEETING SUMMARY
With
ACTION ITEMS

Next Meeting: March 27 - 28, 2001
Ft. McClellan, AL

Primary Agenda: BCP, Team Processes

February Meeting Summary:

Finalize Agenda and Minutes - The BCT reviewed the January minutes, made some clarifying revisions, and accepted them as final. The group also added the following items to the agenda:

- Review Ground Rules and Mission Statement
- RAB Meeting
- Conference Calls

Action Items - The BCT reviewed January's action items, and updated them. The updates are presented in Attachment D.

Parcel Boundaries - Lisa will coordinate the Army's parcel boundary maps with what is in IT's GIS database, and compare it with what the installation is transferring.

BCP - The team decided that Agnes should provide a briefing on the BCP during the March BCT meeting. The objective of the briefing is for Agnes to describe the data she has for each section and her proposed approach, and to solicit ideas from the team about BCP content. All team members agree that this approach to the BCP should result in fewer surprises and a document that everyone can accept.

Asbestos and PCB Briefing - Doyle requested a short briefing on the installation's asbestos and PCB programs. Lisa indicated she would coordinate this activity with Ron, and the team agreed that this would be a March agenda item.

Advocacy Balanced with Inquiry - David provided a short discussion as a follow-up of the previous month's activities. He also provided some written material for the team to read and discuss. The group then participated in an exercise designed to apply the principles of listening, and advocacy balanced with inquiry. David's report is found at Attachment F.

CWM/UXO History - Phil Potter of FWENC provided an overview of the Ft. McClellan UXO program as currently being implemented through Huntsville's contract with Foster Wheeler. Ken Stockwell of Parsons Engineering provided an analogous overview of the CWM program as being implemented through Huntsville's

contract with Parsons Engineering. Fieldwork in both programs is expected to start in the spring. Field activities associated with these programs often require large exclusion zones; IT indicated that coordination of these various programs would become increasingly important due to the need for access to HTRW sites that might fall within these large exclusion zones. Field schedules are necessary from all participants so that downtime can be minimized through work-arounds. The team decided that this topic should be discussed between the various installation departments during a separate meeting to ensure that proper coordination would occur. Members from IT, Mobile, Huntsville, and Ft. McClellan will meet to begin this coordination.

LUCAP/LUCIP - Karen Pinson reviewed the draft Appendix A of the LUCAP with the team and presented a draft LUCIP for T-38. She also indicated that she would provide Doyle and Philip with a copy of the signed LUCAP, once the Army had a copy. Ft. McClellan is expecting to receive the signature sheets shortly, since the signing ceremony took place on December 12. She also indicated that Doyle may receive a copy before Ft. McClellan, since Martha Brock of EPA was a signer. After reviewing the draft LUCIP for T-38, Doyle noted Karen's work on the draft. He used the draft LUCIP as an example of how the team might work "smarter" instead of "harder." He felt that Karen had provided more information in the draft LUCIP than was necessary, specifically he identified two full pages that he felt could be dropped from the document with no adverse affect on the outcome. He also indicated that two pages may not seem like a lot of work, but considering how many sites the team and Karen might have to address, two pages multiplied by numerous sites can result in much extra work and review. Karen and the team totally supported Doyle's assessment. Karen will modify the draft LUCIP for T-38 accordingly.

In its real time review of the draft Appendix A, the BCT agreed to delete HTRW as an issue for Smoke Area R, EBS CERFA parcel label 105(6). Based upon recent BCT decisions, they also agreed to delete the GSA warehouse area from draft Appendix A. There were no further comments to the draft Appendix A. The team also reviewed the Site Listing that the Army must deliver to EPA and the State within 30 days of signature.

Doyle indicated he needed to check to see if parcel boundaries are to be surveyed on the Interim LUC; however, after further consideration, he indicated that a GPS survey and a map would be adequate for the LUCIPs and Interim LUCIPs. Once the deed is executed for property transfer, a land survey will be required.

On-Board Review Minutes - The BCT review the minutes from the on-board review meeting that took place during February 5-6. The team suggested some minor revisions. Jeanne will incorporate the revisions, finalize the minutes, and distribute them to the project team.

RAB Issues - Doyle suggested a briefing to the RAB on the CWM program at Ft. McClellan. The team discussed various means of notifying and disclosing this information to the public. Doyle also suggested that he and Philip meet with the Army at 1:00pm on the date of the RAB to hear the presentation before the Army presents it to the RAB; he felt that the group benefited from the previous 1:00pm pre-briefs. He also suggested that there be an exchange between the Anniston Army Depot (AAD) RAB and the Ft. McClellan RAB. Glynn indicated that he had already spoken with Joan McKinney about the AAD RAB, and has coordinated his attendance at that RAB. He will see if someone from the AAD RAB wants to attend the Ft. McClellan RAB. Philip and Doyle will attend the AAD RABs as well.

Conference Calls - The BCT decided that regularly scheduled conference calls are not required at this time. They can be scheduled if needed in the future.

Ground Rules - The team decided to put the ground rules in the minutes one more time. The group agreed to have a large poster-board with the ground rules displayed during meetings.

Goals and Metrics - Glynn will provide metrics information to the team at the next meeting. The team also decided to keep metrics information in the minutes for one more month pending further discussion of goals and metrics.

M101 Parcel - Dan provided a brief summary of the "Table-top EE/CA" Huntsville is planning to address this parcel. The parcel is included in the Bravo EE/CA contract, but it is a separate work product from the Bravo EE/CA. Huntsville's intention is to use the cleared areas on M2, the Eastern Bypass, the J-spur, and the Zapata clearance grids to demonstrate that the adjoining properties display similar characteristics. The EE/CA will clear to one foot.

Meeting Reflections - All team members indicated positive feedback from the meeting.

Future Meetings (3-month look ahead) - March 27 - 28, Ft. McClellan, April 9 - 12, New Orleans (in conjunction with UXO/Countermining Forum), May 22 - 23, Ft. McClellan.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 28, 2001

EMAIL & US MAIL

4WD-FFB

Mr. Ron Levy
BRAC Environmental Coordinator
U.S. Army Garrison
Environmental Office
Building 215, 15th Street
Fort McClellan, AL 36205-5000

SUBJ: Draft Appendix A of LUCAP; Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject document, and based on the best information available to EPA at this time agrees with it as written. Thank you for your cooperation. If you have any questions, please call me at (404) 562-8549.

Sincerely,

A handwritten signature in cursive script, reading "Doyle T. Brittain", is positioned above the typed name.

Doyle T. Brittain
Senior Remedial Project Manager

cc: Lisa Kingsbury, Ft. McClellan
Ellis Pope, USA, COE
Phil Stroud, ADEM
Karen Pinson, Ft. McClellan
Dave Jenkins, EPA/OTS

2001 JUN 14 01 PM 10:28