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

March 20, 2006

REPLY TO
ATTENTION OF

Office of the Site Manager

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

Dear Mr. Cobb:

This letter transmits the annual report, required by the Land Use Control Assurance Plan (LUCAP), reflecting the status of land use controls (LUC) established for properties on the former Fort McClellan. The LUCAP Appendix A showing sites on the former Fort McClellan where LUC constitute either a part of or the entire interim or final remedy is updated and included at enclosure 1. The LUCAP Appendix D listing agency points of contact is updated and included at enclosure 2.

This letter affirms that LUC for which the Army remains fully or partially responsible have been effective in protecting human health and safety. Signs are replaced when found to be damaged or missing. The Transition Force security personnel and Fish and Wildlife Service personnel note occurrences of sporadic trespassing and warn trespassers to stay out of the restricted areas.

The Joint Powers Authority (JPA) has responsibility for LUC at some of the sites listed on Appendix A. The JPA submitted to ADEM a Land Use Control Effectiveness Report in 2006 for those sites. Additionally, the JPA affirmed that the LUC for the GSA Warehouse Area are in place and are being monitored.

The Parcels 194(7) and 518(7), located in the part of the Ranges West of Iron Mountain Road that lie outside the Bravo Area, have been removed from Appendix A. ADEM concurred with the Draft Site Investigation (SI) Report for the Ranges West of Iron Mountain Road dated August 2003; the concurrence letter is at enclosure 3. The Army implemented a No Further Action decision for Comprehensive Environmental Response, Compensation, and Liabilities Act-related hazardous substances for the Ranges West of Iron Mountain Road and signed a Decision Document in August 2005. The Environmental Protection Agency issued comments on the Draft SI Report, and the Army's response to those comments is at enclosure 4.

The Former Waste Chemical Storage Area for which the National Guard Bureau had LUC responsibility has been removed from Appendix A because arsenic-contaminated soil was removed in 2005. ADEM and the Environmental Protection Agency concurred with the Removal Action Report dated November 2005; the concurrence letters are at enclosures 5 and 6.

Electronic copies of this correspondence with enclosures were provided to Mr. Doyle T. Brittain, U.S. Environmental Protection Agency, Region 4, Atlanta, Georgia; Ms. Miki Schneider, JPA, Anniston, Alabama; Mr. Tom Lederle, Base Realignment and Closure Hampton Field Office, Fort Monroe, Virginia; Ms. Michelle Beekman, Matrix Environmental Services, Colorado Springs, Colorado; Mr. Steve Miller, U.S. Fish and Wildlife Service, Fort McClellan, Alabama; COL Gerald Walter, NGB, Arlington, Virginia; LTC Wayne Sartwell, Alabama National Guard, Montgomery, Alabama; Mr. Bernie Case, Fort McClellan Army National Guard Training Center, Fort McClellan, Alabama, and Mr. Scott Weber, Army Environmental Center, Aberdeen Proving Ground, Maryland.

For additional information, please contact Mrs. Karen Pinson, karen.pinson@us.army.mil, 256-848-6831.

Sincerely,

Gary E. Harvey
Site Manager

Enclosures

LAND USE CONTROL ASSURANCE PLAN APPENDIX A

FORT MCCLELLAN, ALABAMA

March 2006

Site Name & Description from Environmental Baseline Survey (EBS) or Other Document	EBS Parcel Label	X,Y Coordinates	Source or Decision Document	Status of LUC	Site Owner	LUC Responsibility
Eastern Bypass Ordnance and Explosive Site 2 (OES 2)	none	in pretransfer LUCIP	see LUCIP, also Statement of Clearance Apr04	Interim	Army	Army
Bravo Area of the Redevelopment Area	multiple	Deed 13	see LUCIP	Interim	JPA	Army
Blacktop Training Area, Fenced Yard in Blacktop Area	511(7) and 512(7)	Deed 13	see LUCIP	Interim	JPA	Army
Charlie Area Mountain Longleaf National Wildlife Refuge	82Q-X, 88(6), 108(7), 112Q, 113Q-X, 187(7), 213Q, 214Q, 87Q-X, 111Q, 76Q-X, 84Q-X, 223Q, 77Q, 78Q, 80Q, 85Q, 109Q-X, 89Q-X, 215Q, 137Q-X, 82(7)	Letter of Transfer	see LUCIP	Interim	Interior	Army and Interior
General Services Administration (GSA) Warehouse Area	151(7), 2(7), 3(7), 4(7), 67(7), 69(7), 91(7), 111(7), 128(7), 129(7), 238(7)	Deed 12	Final Revision 3 Decision Document 12/02	Final	JPA	JPA
Alpha Area of the Redevelopment Area	multiple	Deed 13	see LUCIP	Interim	JPA	JPA
Former Small Weapons Repair Shop	66(7)	Deed 13	see LUCIP	Interim	JPA	JPA
Former Chemical Laundry and Former Motor Pool Areas 1400 & 1500	94(7)	Deed 13	see LUCIP	Interim	JPA	JPA
Sanitary Landfill # 1	78(6)	Deed 13	see LUCIP	Interim	JPA	JPA
Sanitary Landfill # 2	79(6)	Deed 13	see LUCIP	Interim	JPA	JPA
Sanitary Landfill # 3	80(6)	Deed 13	see LUCIP	Interim	JPA	JPA
Sanitary Landfill # 4 and the Industrial Landfill	81(5), 175(5)	Deed 13	see LUCIP	Interim	JPA	JPA
Fill Area East of Reilly Air Field and the Former Post Garbage Dump	227(7), 126(7)	Deed 13	see LUCIP	Interim	JPA	JPA
Fill Area Northwest of Reilly Air Field	229(7)	Deed 13	see LUCIP	Interim	JPA	JPA
Fill Area North of Landfill No. 2	230(7)	Deed 13	see LUCIP	Interim	JPA	JPA
Reilly Lake	none	Deed 13	see LUCIP	Interim	JPA	JPA
Training Area T-6 (Naylor Field), Training Area T-38, Cane Creek Training Area	183(6), 186(6), 510(7)	Deed 13	see LUCIP	Interim	JPA	JPA

JPA - Anniston-Calhoun County Fort McClellan Development Joint Powers Authority

LUCIP - Land Use Control Implementation Plan

NGB - National Guard Bureau

APPENDIX D

AGENCY POINTS OF CONTACT UPDATED 2006

U.S. Department of the Army

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Army Environmental Center for National Guard Bureau

Mr. Scott Weber
Army Environmental Center
Aberdeen Proving Ground, MD
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U.S. Environmental Protection Agency

Mr. Doyle T. Brittain
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JPA

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U.S. Department of Interior - Fish and Wildlife Service (not a co-signing agency for the LUCAP)

Mr. Steve Miller
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Encl 2

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Laboratory: 277-6718
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May 25, 2005

Mr. Ronald M. Levy
BRAC Environmental Coordinator
Environmental Office, 291 Jimmy Parks Blvd.
US Army Garrison
Fort McClellan, Alabama 36205

RE: ADEM Review and Concurrence: *Draft Site Investigation Report for Ranges West of Iron Mountain Road: Parcels 73Q-X, 91Q-X, 115Q, 116Q-X, 117Q-X, 129Q-X, 151Q, 181(7), 194(7)/518(7), 200Q, 201Q, 228Q, 229Q-X, 231Q, 232Q-X, Washington Tank Range and 1950 Rocket Launcher Range;* dated August 25, 2003
Fort McClellan, Calhoun County, Alabama
Facility I.D. No. AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has completed its review of Fort McClellan's *Draft Site Investigation Report for Ranges West of Iron Mountain Road.* ADEM submitted its initial comments to the Army on November 11, 2003. These comments centered around ADEM's concern that significant lead contamination, in soil and groundwater, was present at these parcels. The Army requested "No Further Action", but ADEM disagreed and requested additional field work be conducted.

The Army issued its response to ADEM comments at the January 7, 2004 Base Closure Team (BCT) meeting. The Army's response disagreed with ADEM's concerns and stated that the BCT decisions regarding risks to human health and the environment have been greatly influenced by the reuse of the property. The BCT agreed to remove parcels 114Q-X and 221Q-X from this site investigation (SI) report and proceed to a remedial investigation (RI) to resolve lead contamination in soil.

ADEM representatives conducted a field visit on January 12-14, 2004 to inspect present conditions at the Ranges West of Iron Mountain Road (RWIMR) as well as ranges associated with the Baby Bains Gap Road Ranges, Bains Gap Road Ranges and Ranges East of Iron Mountain Road. ADEM performed x-ray fluorescence (XRF) spectroscopy to evaluate potential lead contaminated areas in these ranges and to verify that lead concentrations in surface soil were similar in concentrations to previous analysis; however, ADEM did not find any additional areas of significant lead contamination in soil nor any areas containing visible bullets/bullet fragments in the RWIMR.

ADEM issued its findings of field inspection memo to the Army at the February 17, 2004 BCT meeting. The field visit and XRF data collected, as outlined in the memo, resolved ADEM's lead contamination

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Encl 3

issues at the RWIMR. At that time, ADEM could have granted the Army "No Further Action" (NFA) with unrestricted reuse. However, the Environmental Protection Agency (EPA) had concerns with the RWIMR and insisted that all ranges be investigated under Remedial Investigation/Feasibility Study (RI/FS) with Baseline Risk Assessment and additional sampling be conducted. EPA reiterated these concerns at the October 13, 2004 BCT meeting. The Department decided not to issue the NFA until EPA presented its concerns.

On January 25, 2005, risk assessors from EPA, ADEM and the Army met in Atlanta to discuss many technical issues. Items were discussed and issues subsequently resolved relating to geochemistry, human health risk assessments and ecological risk assessments.

The Department concludes that lead contamination issues at RWIMR (excluding the sites to be evaluated via a pending RI) have been resolved. The Department concurs with the *Draft Site Investigation Report for Ranges West of Iron Mountain Road: Parcels 73Q-X, 91Q-X, 115Q, 116Q-X, 117Q-X, 129Q-X, 151Q, 181(7), 194(7)/518(7), 200Q, 201Q, 228Q, 229Q-X, 231Q, 232Q-X, Washington Tank Range and 1950 Rocket Launcher Range*. Therefore, ADEM concurs with the BCT's recommendation that these ranges warrant no further action and an unrestricted reuse designation.

The Department understands that Fort McClellan conducted an Ordnance and Explosive (OE) Engineering Evaluation/Cost Analysis (EE/CA) for the Bravo Area, which includes the RWIMR. At this time, UXO matters remain unresolved in this area and will be addressed during ADEM's review of the related work plans and reports for this area.

For any questions or concerns regarding this matter please contact Mrs. Brandi Little of the Governmental Hazardous Waste Branch. Mrs. Little can be contacted at 334-274-4226 or via email at blittle@adem.state.al.us.

Sincerely,

Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

SAC/TLP/BCL/:L:Eng Serv Sec/Little/Fort McClellan/ Draft Site Investigation Report for Ranges West of Iron Mountain Road: Parcels 73Q-X, 91Q-X, 115Q, 116Q-X, 117Q-X, 129Q-X, 151Q, 181(7), 194(7)/518(7), 200Q, 201Q, 228Q, 229Q-X, 231Q, 232Q-X, Washington Tank Range and 1950 Rocket Launcher Range, August 25, 2003

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Lee Coker/USA COE, Mobile District
Ms. Shana Decker/ADEM
Ms. Miki Schneider/JPA
Ms. Tracy L. Peace/ADEM
Mr. James H. Carlson/ADEM

Draft Site Investigation Report, Ranges West of Iron Mountain Road, Parcels 73Q-X, 91Q-X, 115Q, 116Q-X, 117Q-X, 129Q-X, 151Q, 181(7), 194(7)/518(7), 200Q, 201Q, 228Q, 229Q-X, 231Q, 232Q-X, Washington Tank Range, and 1950 Rocket Launcher Range, Fort McClellan, Calhoun County, Alabama, August, 2003

Response to all EPA Comments:

The Army appreciates the input provided by EPA on the SI conducted at the Ranges West of Iron Mountain Road (RWIMR). However, the Army considers all outstanding issues resolved at the RWIMR. Therefore, individual responses have not been provided.

This decision is based on the following developments:

1. ADEM granted written concurrence on May 25, 2005 for the Draft Site Investigation Report for RWIMR, stating "ADEM concurs with the BCT's recommendation that these ranges warrant no further action and an unrestricted reuse designation." Please see enclosed letter.

2. The *Former Large Caliber Weapons Range, Parcel 114Q-X* and the *Former Rifle Grenade Range North of Washington Range, Parcel 221Q-X* have been removed from the RWIMR site investigation and will undergo a Remedial Investigation and Feasibility Study (RI/FS) to determine potential human and ecological impacts resulting from lead in the site media.

3. A substantial portion of the RWIMR has been permanently altered by land clearing and road construction activities for the Anniston Eastern Bypass Highway.

Comments received from Doyle T. Brittain, Senior Project Manager, dated October 7, 2003

GENERAL COMMENTS

Comment 1: **It must be kept in mind that the purpose for a Site Investigation is to determine whether or not a CERCLA release has occurred. This having been demonstrated by the subject document now requires the next step in the CERCLA process, i.e., a Remedial Investigation and Feasibility Study (RI/FS) with a comprehensive human health and ecological risk assessment.**

Comment 2: **Application of Tier II Background Screening: According to RAGS Part A, background screening is conducted to distinguish site-related contamination from naturally occurring or other non-site related levels of chemicals. Process-related chemicals, i.e., lead bullets at firing ranges, provide undeniable evidence that lead detected at levels exceeding site-specific background is site-related and should be carried forward into the risk assessment. A statistical evaluation, no matter what the degree of**

statistical significance, cannot substitute for forensic evidence from site history. This comment was written because lead was the eliminated based on Tier II and Tier III background reviews. For example, lead bullets were potentially used at many of the ranges and lead in surface soil had a maximum concentration of 3,180 mg/kg. In addition to lead detected in surface soil, lead was also detected above its ESV and background (where appropriate) in surface water, sediment, and groundwater.

The issue of how lead and other site related constituents are evaluated was commented on by EPA in the August 7, 2003, review of the Review and Comments Report for the Data Evaluation Report and Screening Level Ecological Risk Assessment, Baby Bains Gap Ranges (dated July 2003). Many of the comments for the SLERA for the Baby Bains Gap Ranges dealt with the interpretation of the geochemical processes, potential natural sources of metals such as lead or arsenic, and the characteristics of soils present at the ranges that are important in affecting the behavior of the inorganics of interest.

Additionally, if lead bullets or bullet fragments are present at any range contained in this document, then this range should be further evaluated to determine the potential ecological risk derived from particulate lead ingestion.

Comment 3: Warning Against Potential Misapplication of Tier III Background Screening: The geochemical analysis relies on assumed linearity between the concentration of the constituent being evaluated and levels of either iron or aluminum in soil. Caution must be applied when a conclusion is based on extrapolation of a linear relationship beyond the range of the reference data. Iron, aluminum, calcium, magnesium, sodium, silicon, and potassium are macro constituents in soil. The constituents being evaluated in Tier III tend to be trace constituents in natural soils. The concentration of a macro constituent cannot be increased logarithmically without decreasing the relative proportion of other macro constituents. A natural soil will contain a balance of macro constituents, derived from natural weathering of parent rock material, and will exhibit only a certain range of variability in proportions. Due to competition for adsorption sites with other naturally-occurring metal ions and the limited supply of trace metal ions in natural soils, the plot of trace metal concentration versus iron (or aluminum) will tend to bend toward the x-axis as iron concentration increases when iron levels are high. Thus, caution must be applied any time the plot of the line for the geochemical analysis is extended beyond the reference data set, because the relationship will be linear only in the low concentration range.

Comment 4: Inappropriate Aggregation of Data: During the Tier II and Tier III reviews, the sample data from all the ranges was combined into one large

review. The data from each range or area of concern within this document should have been evaluated individually. The combination of all the data from all the areas within this SI serves to dilute the potential risk present at an individual unit. Grouping data for all ranges together impedes assessment of the spatial variation in contamination levels among ranges. Aggregation may conceal inadequate site characterization at individual ranges.

The data from each range should be evaluated separately to ensure that issues associated with potential contamination are adequately addressed (i.e., range use, soil type, habitat, etc.). After the examination of the unit-specific data, any ranges that are contiguous with the unit under consideration can be examined on a larger scale basis if the units had similar contaminants, geology, and use. For example, Parcel 221 Q-X is located in the northeast corner of the ranges in this SI for ranges west of Iron Mountain road. Only Parcel 232Q-X is contiguous to Parcel 221Q-X, therefore, any larger scale review of Parcel 221Q-X should only include Parcel 232Q-X and only if it had similar use history. When there is distance separating one study area from another, the data sets should be treated as separate populations for statistical analysis and risk assessment.

Comment 5: Adequacy of Site Characterization: It appears that many of the ranges in this document have not been fully characterized. For example, the elevated detection of lead (3,180 mg/kg from sample location HR-73Q-GP01) was obtained from Range 17. There are no other sampling locations for surface soil within 150 feet of this sampling location and there are no sampling locations to the east of this location. There were only 6 samples taken on site, with 7 samples off site. Only 1 of the off site samples was within 50 ft of the site, the remaining 6 off site samples were a minimum of 400 feet away from the unit.

This same issue is present for Areas 45 where lead in surface soil, surface water, and sediment had lead exceedances greater than the ESV and background. The lead concentration in surface water at sample location HR-232QX-SW/SD03 is located outside of the parcel boundary (Figure 3-15) and there are no samples taken further downstream to determine the potential extent of contamination.

Comment 6: EPA Background Policy: The presence of concentrations of lead or other constituents detected at levels above risk assessment benchmarks must be communicated to the public in the baseline risk assessment. See OSWER Directive 9285.6-07P. If the concentration levels of a constituent are such that the site cannot support unrestricted use, this fact must be presented to the local reuse authority even when the three-tiered background evaluation suggests that the constituent is naturally occurring.

Comment 7: Rationale to Support Conclusions: As written, the PERA fails to contain

sufficient detail to support the rationale used to eliminate chemicals as COPECs. In this document, the PERA combines the review of all data into one generalized discussion and 4 summary tables. When just looking at lead in surface soil, lead was detected in 101 of 101 samples with a maximum concentration of 3,180 mg/kg. No text is included in Appendix J (the PERA) discussing this chemical. In Section 5.0, the 6 sample locations where lead exceeded both the ESV and background are presented but no discussion concerning these exceedances is included.

It is acknowledged that the PERA included in this document was performed during the site investigation and therefore, should be concise and to the point. However, sufficient discussion must be included in the document to support COPEC selection/elimination.

SPECIFIC COMMENTS

Comment 1: Page 1-5, Section 1.3. This section contains the site description and history for each range included in this SI. However, the actual or approximate size of each individual unit is not included in the descriptions. For each range, the size of the unit should be added to the text.

Comment 2: Page 5-3, Line 11. This section presents the sample locations that exceeded the arsenic ESV and background. Due to the vast size of this document, it would have facilitated review if the range associated with the sample location exceedances had been included in the text. This comment also applies to other metals presented in this section.

Comment 3: Page 10, Appendix H. The results of the slippage test and WRS test for lead is presented. The final conclusion is that lead is within the range of background. Lead concentrations exceeded the 2X background screen and passed the slippage test. It was eliminated as a COPEC based on the WRS test. If a chemical is deemed to be of concern due to site related practices (i.e. lead from bullets), then this chemical should not be eliminated based solely on geochemical analysis. More discussion must be provided to support the overall rationale for exclusion of a chemical as a COPEC, especially if it is deemed to be associated with site use. This comment applies to any other chemical deemed to be related to site practices.

Comment 4: Additionally, the Tier II statistical reviews combined the data from all the ranges into one large dataset. This approach is only valid if the ranges are contiguous and have similar geochemistry. Based on review of Figure 4-1, Site Geological Map, there are at least 5 different types of soils associated with the ranges west of Iron Mountain road. The combination of the all the data serves to dilute the importance of elevated concentrations of any particular constituent, and therefore, potentially serves to underestimate risk.

Comment 5: Page 6, Appendix J, Para 1. This paragraph discusses the use of the Tier II and Tier III review of data. A reference to where this data is located in this document needs to be added to the text.

Comment 6: Page 6, Appendix J, Para 2. The paragraph discusses the first step in the screening of chemicals to determine if they are COPECs. The text should be expanded to briefly discuss the chemicals determined to be COPECs after the Tier I review. This discussion should be followed by text briefly describing chemicals retained as COPECs after Tier II, followed by a brief Tier III discussion.

Comment 7: Figure 1-3. On Figure 1-4, the legend needs to add an explanation of the dashed lines present on the figure.

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March 10, 2006

Mr. Scott Weber
Army Environmental Center
Building E4480, 1st Floor, 5179 Hoadley Road
Aberdeen Proving Ground, MD 21010-5401

RE: ADEM Review and Concurrence: *Removal Action Report Former Waste Chemical Storage Area, Parcel 87(4),* dated November 16, 2005; *Draft Land Use Control Implementation Plan (LUCIP) for the Former Waste Chemical Storage Area, Parcel 87(4),* dated March 26, 2003; *Final Land Use Control Implementation Plan (LUCIP) for the Former Waste Chemical Storage Area, Parcel 87(4),* dated July 16, 2003
Fort McClellan, Calhoun County, Alabama
Facility I.D. No. AL4 210 020 562

Dear Mr. Weber:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the National Guard Bureau's (NGB) subject *Removal Action Report,* including the *Draft* and *Final LUCIPs*. The NGB accepted transfer of this former Fort McClellan property in February 2005.

Prior to transfer, the Army implemented land use controls (LUCs) on the site due to elevated arsenic levels in surface soil beneath the foundation of Building 598, which burned down in 1989. The LUC Implementation Plan (LUCIP) states if the foundation remains in place no remediation is warranted. However, if the foundation is removed the contaminated soil must be remediated for arsenic.

According to the subject document, the NGB demolished the foundation and excavated approximately 250 cubic yards of soil. Prior to backfilling the area with clean soil, confirmation samples taken indicated arsenic levels below the background screening value. Based on these results, the site no longer appears to pose a threat to human health or the environment. Therefore, ADEM concurs with the subject documents and the NGB's request to rescind the LUC Implementation Plan.

Encl 5

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If you have any questions or concerns regarding this matter, please contact Mrs. Brandi Little at 334-274-4226 or via email at blittle@adem.state.al.us.

Sincerely,

Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

SAC/TPS/BCL/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Lee Coker/USA COE, Mobile District
Mrs. Tracy P. Strickland/ADEM
Mr. Frederick Rudolph/ADEM
Ms. Miki Schneider/JPA
Mr. Paul James/ALARNG
Mr. Bernie Case/FM ARNGTC
Mr. Wayne Sartwell/ALARNG

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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November 25, 2005

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Ron Levy
BRAC Environmental Coordinator
U.S. Army Transition Force, Fort McClellan
P.O. Box 5022
Anniston, AL 36205-5000

SUBJ: Removal Action Report, Former Waste Chemical Storage Area, Parcel 87(4)
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject document, and approves it as written. If you have any questions, please call me at (404) 562-8549.

Sincerely,

Doyle T. Brittain

Doyle T. Brittain
Senior Remedial Project Manager

cc: Lisa Holstein, Ft. McClellan
Michael Kelly, US Army AEC
David Smith
Brandi Little, ADEM
Lee Coker, USA/COE
Steve Moran, Shaw Environmental
Daniel Copeland, CEHNC-OE-DC
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Miki Schneider, JPA
Wayne Sartwell, ALANG
Pete Tuttle, USF&WS

Encl 6