

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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MONTGOMERY, ALABAMA

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JAMES W. WARR

DIRECTOR

July 8, 2004

BOB RILEY

GOVERNOR

**CERTIFIED MAIL #7003 0500 0001 2708 1563
RETURN RECEIPT REQUESTED**

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

Facsimiles: (334)
Administration: 271-7950
General Counsel: 394-4332
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-8131
Laboratory: 277-6718
Mining: 394-4326
Education/Outreach: 394-4383

RE: Request for Information and Requirements for ADEM Notification

Fort McClellan, Calhoun County, Alabama
Facility ID No. AL4 210 020 562

Dear Mr. Levy:

In reference to ongoing investigations to identify and remove munitions of explosive concern (MEC) at Fort McClellan, the Alabama Department of Environmental Management (ADEM or the Department) is informing the Army that it requires regular and timely notification of site explosive safety conditions. Please notify ADEM of any and all potential finds of unexploded ordnance (UXO) and/or MEC of any kind that are not in keeping with the most current version of the Conceptual Site Model (CSM).

Please also report to ADEM any and all actual or potential UXO finds or anomalies that have the potential to result in adverse human health risks to DoD or non-DoD property, including private property, state-owned property (e.g., state highways), and other federal property. The list of anomalies should include, but not be limited to, fuzed ordnance (including practice rounds) and any HE configured items (whether fuzed or not).

It is ADEM's understanding that Fort McClellan's UXO contractor is required to comply with Data Item Description (DID) OE-085 regarding weekly status reports. These reports are reportedly due to Fort McClellan (or its Corps of Engineer representative) on the first working day of each week. Section 10.1.4 of this DID requires among other things, that the report include the following information:

- Number of live items located during the week and to date
- Number of inert OE items recovered during the week and to date
- The disposition of any OE items found during the week
- A summary of all OE recovered to date by ordnance type



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For any UXO/OE/MEC finds or anomalies that have the potential to result in human health risks to DoD and non-DoD property, please notify ADEM within 24 hours of identification of such potential concerns. Please also provide ADEM a copy of the weekly report addressing any potential UXO/OE/MEC finds within 48 hours of receipt by Fort McClellan or its DoD representative.

Please institute this notification protocol immediately. Likewise, if there are any instances of historical UXO/OE/MEC finds for which notification was warranted but did not occur, please also bring these to the attention of the Department at this time.

In the development of Fort McClellan's notification requirement, please consider the following DID excerpts governing the UXO/OE/MEC work conducted at this former DoD installation:

DID OE-005-06.01 -- Site Safety and Health Plan: Reference Section 2.3, Hazard Analysis and Risk Assessment:

Identify potential ordnance/UXO items that may be encountered and the necessary steps to mitigate the hazards.

Establish action levels and methods to mitigate hazards, addressing implementation of engineering controls and work practices, work stoppage and/or emergency evacuation of on-site personnel, prevention and/or minimization of public exposures to hazards created by site activities.

DID OE-005-02 – Technical Management Plan: Reference Section 10.1:

Expected number of excavations and procedures to be employed if changed site conditions occur.

Detailed procedures for the reporting and disposition of UXO, including responsibilities of personnel, overall safety precautions, UXO identification, transportation, safe holding areas, operations in populated/sensitive areas, and all demolition and post demolition operations and any required engineering controls for intrusive operations and intentional detonations.

DID OE-010 – Engineering Evaluation/Cost Analysis(EE/CA) Report: Reference Section 10.2.4.3:

Description of Hazards or Specific OE Encountered. Summarize OE on site and characterize hazard presented by each of those items. Include photographs and/or schematics of all significant items.

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DID OE-005-11 – Quality Control Plan: Reference Section 10.1.2:

Personnel performing quality functions shall have well-defined responsibilities, to include stop-work authority, and the organizational freedom to identify, evaluate, initiate, recommend or provide solutions, and approve corrective actions.

DID OE-060 – Conventional Explosives Safety Submission: Reference Sections 10.3.2 and 10.10:

If, during the course of actual removal, a round with greater fragment distance is encountered, then Q-D arcs shall be adjusted and an amendment to the safety submission shall be submitted for approval. Personnel performing quality functions shall have well-defined responsibilities, to include stop-work authority, and the organizational freedom to identify, evaluate, initiate, recommend or provide solutions, and approve corrective actions.

For real property being released outside DOD, summarize any land use restrictions or other institutional controls to be placed on the property.

- ❑ The Department requests that Fort McClellan acknowledge receipt of this letter and provide a statement of understanding to the Department in writing within 7 days from the date of receipt.

Should you have any questions, contact Mr. Jim Grassiano at (334) 271-7738 or via e-mail at jwg@adem.state.al.us.

Sincerely,



Wm. Gerald Hardy, Chief
Land Division

WGH/CDB/JWG/:L:Gov Fac Sec/Bush/ UXO notification.doc

cc: Mr. Jim Grassiano/ADEM
Ms. Shana Decker/ADEM
Mr. Phillip Stroud/ADEM
Mr. Dan Copeland/COE
Mr. Art Holcomb/TT/FW
Mr. Spencer Nelson/URS
Mr. Buddy Cox/ALDOT

File: Land Division/Hazardous Waste/Fort McClellan/Correspondence/2004

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