



REPLY TO  
ATTENTION OF

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

August 3, 2004

Fort McClellan, Alabama

Mr. Ron Shell  
Alabama Department of Environmental Management  
Land Division  
Governmental Hazardous Waste Branch  
1400 Coliseum Blvd.  
Montgomery, Alabama 36110-2059

Dear Mr. Shell:

Pursuant to Administrative Order No. 04-086-EHW dated July 30, 2004, I am requesting your approval to continue cleanup operations to remove 3X scrap materials at T-38, a former chemical warfare materiel training area where remnants of military training remain. Work is scheduled to resume August 5, 2004. Enclosed are a justification prepared by the Mobile District Corps of Engineers for continuance of the scrap removal (enclosure 1) and a letter previously provided to the members of the Joint Powers Authority notifying them of our intention to continue work at the site (enclosure 2).

Copies of this letter with attachments were furnished to Mr. Jim Grassiano, ADEM; Ms. Robin Mills, Base Realignment and Closure Hampton Field Office; Mr. Lee Coker, Mobile District Corps of Engineers.

Please contact Mr. Ron Levy at 256-848-6853 if you have any questions.

Sincerely,

  
Gary E. Harvey  
Site Manager

Encls



DEPARTMENT OF THE ARMY  
MOBILE DISTRICT, CORPS OF ENGINEERS  
P.O. BOX 2288-0001  
Mobile, Alabama 36628-0001  
August 3, 2004

REPLY TO  
ATTENTION OF:  
EN-GE/Lee Coker

Gary Harvey  
Site Manager  
US Army Garrison/Transition Force  
Environmental Office  
291 Jimmy parks Blvd., Bldg. 251  
Fort McClellan, AL 36205-5000

Subject: Continuance of Work on the 3X Scrap Removal Project at T-38

Dear Mr. Harvey:

As you are aware, ADEM has issued Administrative Order No. 04-086-EHW, dated July 30, 2004, which requires the USAG and its contractors to stop all "munitions investigations and recovery actions" on Fort McClellan. Therefore, the 3X scrap removal at Training Area T-38 (See Attached Site Map) has been halted. To date, our contractor, Shaw, Inc., has mobilized all personnel and equipment to Ft. McClellan this week with intrusive work at the site scheduled to begin on Thursday, August 5, 2004.

This letter provides justification for the continuance of the 3X scrap removal in order to avoid additional costs and delays.

In support of this justification, the following points are made:

- Of the 6-acre site located within the fenced area at T-38, the 3X scrap removal project is comprised of two anomalies covering approximately 2,200 sq. ft.
- T-38 lies within the Range Surface Danger Zone for multiple historic ranges at Fort McClellan. A range surface danger zone identifies an area where an ordnance trajectory may reach without regard to topography.
- All of the ranges that overlie T-38 are believed to be small arms ranges. Therefore, ordnance and explosive (OE) impact areas are not anticipated within the fenced area at T-38.
- Several investigations have been conducted at T-38:
  - HTRW investigations (SI and RI; SAIC, 1993 and 1995)
  - CWM EE/CA (Parsons, 2002)
  - HTRW investigations (RI and expanded RI; IT Corporation, 1999-2003)

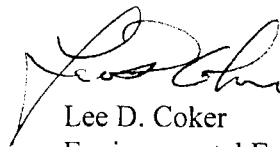
- 3X Scrap Removal (Shaw, 2003 to present)

As part of each of these investigations, UXO avoidance, and in some cases UXO construction support, were employed to complete. **During the course of all site activities at T-38 over the past 11 years, there have not been any UXO discoveries to indicate the presence of an OE impact area.**

- The only OE items encountered at T-38 since 1993 were found in the burial pit anomalies identified by Parsons as containing 3X scrap. Those items were used as training aides and had been previously filled with agent, decontaminated, and then disposed in the burial pits.

The U.S. Army Corps of Engineers, Mobile District respectfully request you obtain clarification from ADEM as to the status of this project.

Sincerely,



Lee D. Coker  
Environmental Engineer

Attachment: Site Map





REPLY TO  
ATTENTION OF

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

July 19, 2004

Fort McClellan, Alabama

Commissioner James "Pappy" Dunn  
1702 Noble Street  
Suite 103  
Anniston, Alabama 36201

Dear Commissioner Dunn:

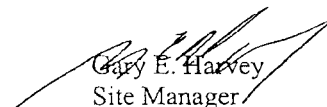
We are preparing to resume cleanup operations to remove scrap materials at T-38, a former chemical warfare materiel (CWM) training area where remnants of military training remain. Operations are set to begin on August 2 and the fieldwork should be completed by September 24, 2004. We will provide a press release to local media detailing the upcoming activities.

Based on evaluation (Engineering Evaluation/Cost Analysis (EE/CA)) of the military training history at the site, we determined there was only a remote probability that any actual CWM would be found during cleanup of scrap left over from training. Additionally, any scrap that may have been contaminated with or in contact with CWM during the training would have been decontaminated under strict training procedures to a level defined as 3X wherein no detectable CWM would remain. Based on this determination, we undertook and managed scrap removal at the site as a hazardous toxic waste response action. In November 2003 we found a vial containing chemical agent from a Chemical Agent Identification Set. We stopped the removal, assessed the situation, and decided the history of the site still warranted only a remote probability of finding additional CWM. Because we were confident with the EE/CA findings and still considered the probability for finding additional CWM to be remote, we requested approval from the Department of the Army to continue managing the site as a hazardous toxic waste response action. After a complete review of all the pertinent data by all the agencies involved along with careful consideration given for the safety of both the workers and the community, the Department of the Army granted approval for us to continue managing the removal as a hazardous toxic waste response.

Copies of this letter were furnished to Ms. Shana Decker, Alabama Department of Environmental Management; Mr. Doyle Brittain, Environmental Protection Agency Region 4; and Ms. Francine Cole, Base Realignment and Closure Hampton Field Office.

Please do not hesitate to call me, 256-848-3847, if you have any questions.

Sincerely,

  
Gary E. Harvey  
Site Manager