



**DEPARTMENT OF THE ARMY**  
**OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9**  
**600 ARMY PENTAGON**  
**WASHINGTON DC 20310-2400**

REPLY TO  
ATTENTION OF

DAIN-ISE

12 February 2021

MEMORANDUM FOR Deputy Assistant Secretary of the Army, Environment, Safety, and Occupational Health (DASA-ESOH / Ms. Borman), 600 Army Pentagon, 5C140, Washington, DC 20310-0600

SUBJECT: Notification and Authorization Pursuant to Releases of Per- and Polyfluoroalkyl Substances (PFAS) on Base Realignment and Closure (BRAC) Property at Former Fort McClellan Transferred Property

1. Purpose:

a. Document the Army's review of existing information pertaining to the former Fort McClellan property and make a determination whether historical use or storage of PFAS containing materials may have resulted in a release of PFAS compounds into the environment. The term PFAS includes, but is not limited to perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA) and perfluorobutanesulfonic acid (PFBS). This MFR provides background and justification for the site-specific PA/SI recommendation related to PFAS on Fort McClellan.

b. This MFR also provides notice, in accordance with AR 200-1 Ch. 11-10, and provides the notification to gain access to real property that is formerly Army-owned, but transferred outside the Federal Government, for the purposes of sampling, investigating, and potential remedial response to releases of PFAS substances at Fort McClellan.

2. Background:

a. BRAC 1995 closed Fort McClellan. At the time of closure, Fort McClellan consisted of 41,013 acres, of which 18,443 acres were determined to be excess property. The Army retained approximately 22,570 acres for an Alabama National Guard (ALNG) enclave. The Army has conveyed 18,431 acres of excess property to various federal, state, and local entities with two transfer parcels consisting of approximately 11.82 acres remaining to be transferred. A detailed conveyance breakout is included in Attachment A.

b. In May 2016, the U.S. Environmental Protection Agency (EPA) declared a Lifetime Health Advisory (LHA) for PFOS and PFOA, singly or combined, of 0.07 micrograms per liter (µg/L) or 70 parts per trillion (ppt) in drinking water. In September 2018, the Army issued guidance and instructions to complete historical research to find potential PFAS source areas, and a "Key Word" search effort within the Defense Environment Restoration Program (DERP) environmental site inventory was performed. Words such as crash, burn, fire, training, and pit were searched for within the inventory. The search resulted in a list of installations with environmental sites that may have potentially used, stored, or released PFAS. The list includes an environmental site located on former Fort McClellan property; however, the environmental site is located on property that is no longer owned by the Army.

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3. Recommendation:

Recommend, as described in detail in Attachment A, approval for a site-specific PA/SI for the former Fire Training Pit (FTMC-022) only, and for no further action for the remaining Fort McClellan, which includes the Snap Road Parcel and the Highway 21 parcels scheduled for conveyance in FY21 and FY22.

The point of contact for this memorandum is Owen Nuttall, Site Manager and BRAC Environmental Coordinator, 404-469-3399, owen.m.nuttall.civ@mail.mil.

Encls

BRANDYE L. WILLIAMS  
COL, GS  
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## ATTACHMENT A

**BLUF:** Recommend site-specific PA/SI for the former Fire Training Pit (FTMC-022) because there is a potential that PFAS-containing material was released at this site. This site was remediated through excavation and clean backfill in 1986, and transferred to private ownership in 2001. The current private ownership re-use of this site is industrial manufacturing. No Further Action is recommended for the remaining former Fort McClellan, which includes the Snap Road Parcel (1.65 miles from FTMC-022) and Highway 21 Parcel (1.59 miles from FTMC-022) that is about to be transferred (the Snap Road Parcel deed already has recipient's signature).

1. **Name of Installation:** Former Fort McClellan
2. **Installation Summary:** Fort McClellan was closed under the 1995 Base Realignment and Closure (BRAC) Program on September 30, 1999. Prior to closing, Fort McClellan was a U.S. Army Garrison Command under the jurisdiction of the U.S. Army Training and Doctrine Command. The installation housed three major organizations, including the U.S. Army Military Police School, the U.S. Army Chemical School, and the Training Center. Fort McClellan also served as a training facility for U.S. Army Reserve and National Guard units. In 1998, the Army completed an Environmental Baseline Survey (EBS) to identify parcels on Fort McClellan that may have impacted the environment. In 2001, to supplement the EBS, the Army completed an additional investigation that focused on the installation's munitions training areas, and the findings from this investigation were documented in an Archives Search Report (ASR). The information from the EBS and ASR was used as the basis for identifying sites at Fort McClellan that may pose a threat to human health, safety, and the environment. Site Investigations were conducted at potential hazardous waste sites identified in the EBS and ASR from 1998 through 2013. The site investigations revealed two predominant types of contamination: metals in soil caused by small-arms ammunition from historical use of ranges for weapons firing, and chlorinated volatile organic compounds in groundwater believed to be from decontamination solutions used during chemical warfare material training activities. Sites where contamination was found to be present were investigated further to determine the nature and extent of the contamination, and to develop and evaluate remedial alternatives. There is no information in the Fort McClellan environmental assessments/investigations that indicate Per- and Polyfluoroalkyl Substances (PFAS) were used, stored, or released on the installation.
3. **Date Transferred, Authority Used:** The authority used to transfer Fort McClellan was under BRAC Act of 1990 (part A of the title xxix of Public Law No.101-510; U.S.C § 2687 note). The Army has conveyed 18,431 of the installation's 18,443 excess acres. Recipients are listed below by conveyance authority.

| Economic Development Conveyance (EDC)        |         |
|--|---------|
| Parcel Recipient                             | Acres   |
| Joint Powers Authority (original LRA)        | 9,714.5 |
| Ft. McClellan Credit Union                   | 1.0     |
| Alabama Department of Transportation (ALDOT) | 271.6   |

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|   |          |
|---|----------|
| McClellan Development Authority (MDA) (current LRA) | 23.0     |
| Total   | 10,010.1 |

| Fed-to-Fed                                   |         |
|--|---------|
| Parcel Recipient                             | Acres   |
| U.S. Fish and Wildlife Service               | 7,758.7 |
| U.S. Department of Justice                   | 64.3    |
| U.S. Department of Health and Human Services | 18.8    |
| Total  | 7,841.8 |

| Public Benefit Conveyance (PBC)     |       |
|-------------------------------------|-------|
| Parcel Recipient                    | Acres |
| ALDOT                               | 365.0 |
| State of Alabama                    | 72.3  |
| Montgomery County                   | 7.1   |
| City of Anniston                    | 129.9 |
| Developer                           | 4.6   |
| Federal Emergency Management Agency | 0.5   |
| Total                               | 579.3 |

- a. The former Fire Training Pit (FTMC-022) was remediated through excavation and clean backfill in 1986, and transferred to private ownership (McClellan Development Authority) in 2001.
4. **Anticipated Transfer of Army-owned Property:** The Army plans to convey the remaining 11.82 acres in accordance with the schedule below.

| Parcels                   | Parcel Acres | Disposal FY | Parcel Recipient | Conveyance Authority |
|---------------------------|--------------|-------------|------------------|----------------------|
| Snap Road Water Tank Site | 0.94         | 2021        | MDA              | EDC                  |
| Highway 21                | 10.88        | 2028        | ALDOT            | PBC                  |

- a. Status of the Snap Road Water Tank Site transfer parcel – The Alabama Department of Environmental Management (ADEM) concurred with the Finding of Suitability to Transfer (FOST) in February 2020. The Army signed the FOST in February 2020. The Army Corps of Engineers is preparing the deed for transfer to the McClellan Development Authority (MDA). No PFAS or PFAS-containing material has been found to be used, stored, or released on this property.
- b. Status of the Highway 21 transfer parcel – This transfer parcel is adjacent to a former landfill (Landfill No. 3) located on the western boundary of former Fort McClellan. Groundwater iso-concentration maps developed during the remedial investigation of Landfill No. 3 indicate that a chlorinated volatile organic compound (VOC) groundwater plume extends from the western boundary of the landfill into the median of State Highway 21. Completion of the groundwater characterization and remediation activities are being performed by the McClellan Development Authority (MDA) as set forth in the Environmental Services Cooperative Agreement (ESCA). Preparation of the FOST and deed will follow completion of the groundwater remedy and associated documentation. No PFAS or PFAS-containing material has been found to be used, stored, or released on this property.
5. **Groundwater Remedy/Use:** The water supply for the former Fort McClellan is, since 1917, Coldwater Springs as provided by the Anniston Water Works and Sewer Board. The Anniston Water Works and Sewer Board tested for PFOS and PFOA in 2014 under EPA's Unregulated Contaminant Monitoring Rule - UCMR3. PFOS and PFOA were non-detect. The groundwater at Fort McClellan is not used for potable purposes. There is no groundwater

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remedy for the former Fire Training Pit (FTMC-022), nor is there a groundwater use restriction.

6. **State Status:** The State of Alabama has not established a standard as a result of the U.S. Environmental Protection Agency's Lifetime Health Advisory. Additionally, the regulators involved at this site have not approached the Army to perform any PFAS investigations.
7. **Potential for PFC contamination? Yes or No or likely:** Unknown at the former Fire Training Area.
8. **Recommendation:** Fort McClelland did not have metal plating activities, nor did it have an aviation mission on any part of the property. A key word search of the Defense Environment Restoration Program (DERP) Environmental Site Inventory found one environmental site on Fort McClellan (Former Fire Training Pit, FTMC-022) within the inventory. Details are below.

FTMC-022, Fire/Crash Training Area (Former Fire Training Pit) and FTMC-234, Consolidated Maintenance Facility: The Former Fire Training Pit was used once a year to train firefighters. In 1986, the Fire Training Pit was excavated and backfilled with clean fill and the Consolidated Maintenance Facility (FTMC-234) was constructed on top. FTMC-022/FTMC-234 was transferred to the McClellan Development Authority on 13 July 2001 and is currently being used as an automotive components manufacturing plant. Because the site was excavated and backfilled with clean fill, there is only a small possibility of a potential Army historic source of PFAS contamination. The Army does not know whether AAAF was used during fire fighter training. The current private industrial re-use of the site complicates the ability to differentiate between any potential Army historic source from a present-day source since 2001.

There is no information in the Fort McClellan environmental assessments/investigations that indicate PFAS or PFAS-containing material were used or stored on any part of Fort McClellan property. Additionally, because environmental site FTMC-022 has been excavated and backfilled with clean fill, there is no known potential PFAS source located on the property. However, PFAS was not investigated or documents before or when the site was remediated in 1986. Consequently, there is a possibility that PFAS may have been used, stored or disposed at FTMC-022. Thus, a PFAS Preliminary Assessment and Site Inspection, to include sampling, is supported for FTMC-022 only.

A PFAS Preliminary Assessment is not supported for any other area on Fort McClellan because there is no documentation and a reasonable possibility of AAAF being used outside of the Former Fire Training Pit. Thus, a PFAS Preliminary Assessment is not supported for the Snap Road Parcel (1.65 miles from FTMC-022) and Highway 21 Parcel (1.59 miles from FTMC-022) because of the distance from FTMC-022 and different property usage.

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## **ATTACHMENT B**

1. 10 U.S.C. 2701 et. seq.
2. DoDM 4715.20 Defense Environmental Restoration Program Manual (9 March 2012)
3. DoDI 4715.18 Emerging Contaminants (13 December 2017)
4. AR 200-1 (13 December 2007)
5. Base Redevelopment and Realignment Manual (1 March 2006)
6. Department of Army Guidance to Address Perfluoro-octane Sulfonate and Perfluoro-octanoic Acid Contamination (29 August 2016)
7. Memorandum, Subject: Army Guidance for Addressing Releases of Per-Polyfluoroalkyl Substances (September 2018)