

ADEM



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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December 1, 2003

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

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Groundwater: 270-5631
Field Operations: 272-8131
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RE: ADEM Review and Concurrence: *Draft- Site Specific Work Plan, Remedial Investigation, Addendum IV, Ranges Near Training Area T-24 Alpha, Parcels 88(7), 108(7), 112Q, 113 Q-X, 123Q, 187(7), 213Q, and 214Q, dated October 15, 2003, Fort McClellan, Calhoun County, Alabama*
Facility ID No. AL4 210 020 562
DSMOA Fund Code: 2535-223-0445

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort McClellan's Addendum IV *Draft Remedial Investigation (RI) Workplan for the ranges near Training Area T-24 Alpha.*

Prior to its proposed fourth phase of RI at T-24A, Fort McClellan has already reportedly performed a Site Investigation (SI) and several phases of remedial investigation at these parcels. These early RI phases have already been completed at this time. However, it appears that ADEM has not received an RI Report documenting the complete findings obtained by the Army to date. The Addendum IV Workplan only provides a graphical summary of certain monitoring well data collected in 1994, 1998, 2001 and data summary tables for monitoring wells analyzed in 2003. The Army should submit a complete RI Report to the Department that provides a summary of all RI data and findings to date.

According to Fort McClellan's Addendum IV RI Work Plan, Fort McClellan identified a carbon tetrachloride plume and a benzene plume present in groundwater at concentrations exceeding established site specific screening levels. Fort McClellan determined that further investigation will be required to fully characterize the nature and extent of VOC contamination in the groundwater at this site.

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Mr. Ronald M. Levy
December 1, 2003

Based on ADEM's review of the subject Site Specific work plan submittal, the Department concurs with Fort McClellan's recommendation to further investigate groundwater contamination at the Ranges Near Training Area T-24A, including the installation of three additional groundwater monitoring wells in the vicinity of Parcel 187(7).

Once again, the Department has not yet received an RI Report summarizing the Army's complete findings to date. However, based on the results of the previous soil sampling, further investigation of the Ranges Near Training Area T-24A also appears warranted to define the extent of metal contamination in surface soils. As with several other ranges at Fort McClellan, the presence of lead bullets and bullet fragments, as well as the presence of any related antimony, chromium, and copper in this area, must be resolved with regard to human and ecological risk.

The Department understands that Fort McClellan conducted an Ordnance and Explosive (OE) Engineering Evaluation/Cost Analysis for the Charlie Area, which includes the ranges near Training Area T-24A. At this time, UXO matters remain unresolved in this area and will be addressed during ADEM's review of the related workplans and reports for this area.

If you have any questions or concerns regarding this matter please contact Ms. Shana Decker of the Governmental Hazardous Waste Branch. Ms. Decker may be contacted at 334-270-5636 or via email at sdecker@adem.state.al.us.

Sincerely,



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

SAC/MDH/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Lee Coker/USA COE, Mobile District
Ms. Miki Schneider/JPA
Mr. Jim Grassiano/ADEM
Mr. Philip Stroud/ADEM

File: Land Division/DSMOA/HW/Fort McClellan/Correspondence, 2003



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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January 27, 2004

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Mr. Ron Levy
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U.S. Army Garrison/Transition Force
Environmental Office
291 Jimmy Parks Boulevard, Bldg. 215
Fort McClellan, AL 36205-5000

SUBJ: Draft Site-Specific Work Plan Remedial Investigation, Addendum IV; Ranges Near Training Area T-24 Alpha; Parcels 88(7), 108(7), 112Q, 113 Q-X, 123Q, 187(7), 213Q, and 214Q; Fort McClellan

Dear Mr. Levy:

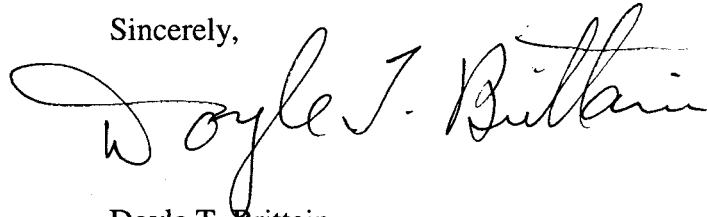
The Environmental Protection Agency (EPA) has reviewed the subject document. EPA approves the subject document and offers three comments for consideration.

1. The purpose of the Remedial Investigation (RI) is to determine the nature and extent of contamination both horizontally and vertically in all environmental media. Regardless of the number of samples taken or the number of groundwater monitoring wells installed, EPA expects the RI Report to have adequate data in all environmental media so the Army can draw an isocontour line showing that the area within the line in each media is the area of contamination and the area outside of the isocontour line is uncontaminated.
2. The summary of the groundwater results already generated are being compared to risk assessment screening values when they should be being compared to background. Risk assessment follows, and then risk management follows that.
3. Figure 1 has the note that "Common lab contaminants acetone, methylene chloride, bis(2-ethylhexyl) phthalate not included." While EPA does not argue that these are contaminants sometimes encountered in laboratory analyses, it is incumbent on the Army to demonstrate whether or not this is an issue in the samples taken and if necessary to resample to determine whether or not these are actual environmental contaminants or laboratory artifacts.

ROD JAWO4 222

If you have any questions, please call me at (404) 562-8549.

Sincerely,

A handwritten signature in cursive script that reads "Doyle T. Brittain". The signature is fluid and elegant, with a large initial 'D' and a long horizontal flourish extending across the line.

Doyle T. Brittain
Senior Remedial Project Manager

cc: Lisa Holstein, Ft. McClellan
Philip Stroud, ADEM
Jeanne Yacoub, Shaw