



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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March 30, 2004

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

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Field Operations: 272-8131

Laboratory: 277-6718

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RE: ADEM Response to Comments: Final Site Investigation (SI) Report, Range 4A Fog Oil Storage Area Parcel 123(6), Response to ADEM Review Comments, November 18, 2002
Fort McClellan, Alabama
Facility ID No. AL4 210 020 562
DSMOA Project No. 2525-223-0445

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort McClellan's response to ADEM's review comments on the subject SI Report. In Fort McClellan's response, the Army continues to state that Parcel 123(6) should be released with no further action and unrestricted land reuse. The April 2002 Final SI Report presented analytical results for four subsurface soil samples and identified arsenic as the only risk driver, yielding an unacceptable incremental lifetime cancer risk (ILCR) and an elevated hazard index (HI) value for potential residential exposure.

Sample location HH0002 indicated that arsenic was present at 66 mg/kg at a sample depth of 6 to 7 feet below grade. This result exceeded the established SSSL (0.4 mg/kg), the nominal background (18.3 mg/kg), the upper background (38.0 mg/kg), and the preliminary remediation goal (PRG) established by EPA Region 4 (20 mg/kg). The Final SI report indicates that the Army was not able to identify a source of arsenic that may have been historically used at the site and that may have contributed to the elevated level of arsenic present at Parcel 123(6).

It appears from the data and information submitted in the SI Report that the elevated level of arsenic at sample location (HH0002) is an anomaly and is not representative of the nominal arsenic level at the site. Because only one sample was noted to be somewhat elevated, the single anomalous sample occurred at depth, there is no source of arsenic anticipated, and no surface soil contamination was noted, the Department does not believe that further investigation is warranted at this site for arsenic.



In its review of this submittal, the Department has noted that certain groundwater sampling and analysis protocols were not appropriately followed by Fort McClellan's field personnel. The Army presented analytical results for nineteen metals from groundwater sample PR-123-MW01. Nine of these metals exceeded established SSSL concentrations. However, the SI Report further documented that the single groundwater sample had significantly elevated levels of turbidity exceeding 1000 NTU's. Based on this observation, the Army apparently directed its contract laboratory to re-analyze the sample after a period of quiescent settling to settle out particulates. The decant represented the sample that was re-analyzed. The decant sample yielded detection of only ten metals with only three metals exceeding SSSLs. It should be noted here that all of the samples but one according to this report had high levels of turbidity during the sampling event.

The Installation Wide Sampling and Analysis Plan describes the standard operating procedures (SOP) that Fort McClellan is to follow for its groundwater sampling. The SOP is located in attachment 5 of Volume I of the approved sampling and analysis plan (SAP). The SAP states that wells are to be purged, maintaining a turbidity level of less than 10 NTU or less than 20 NTU for samples not requiring metals analysis. If purging does not result in turbidity level of less than 10 NTU then, in accordance with the SAP, Fort McClellan is to implement low-flow purging of the well.

Based on ADEM's review of the SI report, it appears that Fort McClellan did not follow the approved procedures described Installation-Wide SAP. Based on the groundwater sampling data submitted in this particular SI Report, it does not appear that further groundwater sampling is warranted at this site; however, the Army should prevent recurrence of improperly sampling turbid well samples.

This issue has been previously noted by ADEM at various partnering meetings and in prior ADEM correspondence. In response, the Army conducted a groundwater monitoring well study specifically concerning turbidity in monitoring wells on Fort McClellan. The Army submitted a letter to ADEM dated August 7, 2000 (attached as appendix K to the Site Investigation Report for the Former Washrack, Building 1740, Soldiers Chapel Parcel 127(7)) that describes the turbidity problem associated with groundwater sampling on Fort McClellan. The letter described the procedures that Fort McClellan was to follow for all future groundwater sampling events. The Department requests that the Army again refer to this letter. Also, if there are any other exceptions to the approved SAP that may have been implemented at this or other sites at Fort McClellan, please bring these to the attention of the Department.

The Department concurs with the Army's recommendation of no further action with the subsequent release of Parcel 123(6) for unrestricted land reuse.

A copy of this letter is being sent to the Joint Powers Authority. The JPA will in turn be responsible for revising the present Cleanup Agreement to address the present status of Parcel 123(6).

Mr. Ron Levy
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Should you have any questions, contact Mr. David Bush of the Governmental Hazardous Waste Branch at (334) 270-5651 or via e-mail at cdb@adem.state.al.us.

Sincerely,



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

SAC/CDB/PNS//:L:Gov Fac Sec/Bush/Fort McClellan/Final Site Investigation Report Range 4A
Fog Oil Storage Area, Parcel 123(6)

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Jim Grassiano/ADEM
Ms. Shana Decker/ADEM
Ms. Miki Schneider/JPA

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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ATLANTA, GEORGIA 30303-8960

November 27, 2002

EMAIL & US MAIL

4WD-FFB

Mr. Philip Stroud
Alabama Department of Environmental Management
Hazardous Waste Branch, Land Division
1400 Coliseum Boulevard
PO Box 301463
Montgomery, AL 36110-2059

SUBJ: Response to Fort McClellan's Comments on the Final Site Investigation Report and
Decision Document for the Range 4A Fog Oil Storage Area, Parcel 123(6);
Fort McClellan

Dear Mr. Stroud:

The Environmental Protection Agency (EPA) has reviewed the subject documents and, as agreed upon in the February 2002, On-Board Review, considers the documents acceptable for approval. As the Alabama Department of Environmental Management (ADEM) considers appropriate, please transmit these comments to Fort McClellan (FTMC). If you have any questions, please call me at (404) 562-8549.

Sincerely,

Doyle T. Brittain
Senior Remedial Project Manager

cc: Ron Levy, FTMC
Lisa Holstein, FTMC
Lee Coker, USA/COE
Jeanne Yacoub, Shaw Environmental
Daniel Copeland, CEHNC-OE-DC
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