

ADEM



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 ♦ 1400 COLISEUM BLVD. 36110-2059

MONTGOMERY, ALABAMA

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JAMES W. WARR

DIRECTOR

DON SIEGELMAN

GOVERNOR

May 13, 2004

Ronald M. 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: ADEM Review and Concurrence: *Final Site Investigation Report – Former Range 43, Parcel 97Q, Range, Choccolocco Corridor, Parcel 144Q-X and Impact Area, Choccolocco Corridor, Parcel 147Q-X* dated April 16, 2004
Fort McClellan, Calhoun County, Alabama
Facility I.D. No. AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort McClellan's *Draft Site Investigation Report* regarding Parcels 97Q, 144Q-X and 147Q-X in the Choccolocco Corridor. ADEM concurs with the overall content and intent of the submittal. ADEM also concurs with Fort McClellan's response to ADEM's comments regarding the Draft Site Investigation for these parcels submitted on January 9, 2004.

After conducting the site investigation for these three parcels, Fort McClellan concluded that a remedial investigation was warranted. ADEM and EPA agree that further investigation is appropriate and warranted at this time. Fort McClellan has already submitted a remedial investigation (RI) work plan to ADEM addressing several parcels located in the Choccolocco Corridor, including Parcels 97Q, 144Q-X and 147Q-X. The RI work plan is currently under review by the Department.

According to the text, Parcel 97Q was used as a small arms range and possibly smoke training. Parcel 144Q-X was a former range. Reportedly, impact areas within the range suggest that large-caliber weapons may have been fired toward this parcel. Also, fused ordnance may be present at this parcel. Parcel 147Q-X was a former impact area. Fused ordnance may also be present at this parcel. The report states that the most significant contaminant of potential concern is lead. As with several other ranges at Fort McClellan, the presence of lead bullets and bullet fragments must be resolved with regard to human and ecological risk.

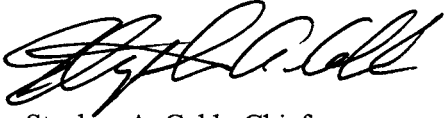
The Department understands that Fort McClellan conducted an Ordnance and Explosive (OE) Engineering Evaluation/Cost Analysis for the Charlie Area, which includes the Choccolocco Corridor. At this time, UXO matters remain unresolved in this area and will be addressed during ADEM's review of the related work plans and reports for this area.



Mr. Ronald M. Levy
January 9, 2004

If you have any questions or concerns regarding this matter please contact Mrs. Brandi Little at 334-274-4226 or via email at blittle@adem.state.al.us.

Sincerely,

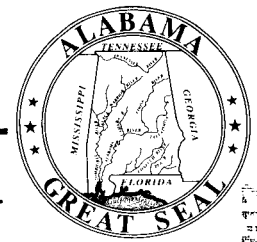


Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

SAC/BCL/:L:Gov Fac Sec/Stroud/Fort McClellan/ADEM Concurrence, Final SI for Parcels 97Q, 144Q-X and 147Q-X, April 16, 2004.doc

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Lee Coker/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
Mr. Philip Stroud/ADEM
Ms. Shana Decker/ADEM
Ms. Kristy Wright/ADEM
Mr. Richard Cumbie/Alabama Forestry Commission

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



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JAMES W. WARR
DIRECTOR

BOB RILEY
GOVERNOR

January 9, 2004

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

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RE: ADEM Review and Concurrence: Draft Site Investigation Report – Former Range 43, Parcel 97Q, Range, Choccolocco Corridor, Parcel 144Q-X and Impact Area, Choccolocco Corridor, Parcel 147Q-X dated April 30, 2003
Fort McClellan, Calhoun County, Alabama
Facility I.D. No. AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort McClellan's *Draft Site Investigation Report* regarding Parcels 97Q, 144Q-X and 147Q-X in the Choccolocco Corridor. ADEM concurs with the overall content and intent of the submittal. However, ADEM and EPA have some comments that warrant future attention. These comments are attached for your review.

After conducting the site investigation for these three parcels, Fort McClellan concluded that a remedial investigation was warranted. ADEM and EPA agree that further investigation is appropriate and warranted at this time. Fort McClellan has already submitted a remedial investigation (RI) workplan to ADEM addressing several parcels located in the Choccolocco Corridor, including Parcels 97Q, 144Q-X and 147Q-X. The RI workplan is currently under review by the Department.

According to the text, Parcel 97Q was used as a small arms range and possibly smoke training. Parcel 144Q-X was a former range. Reportedly, impact areas within the range suggest that large-caliber weapons may have been fired toward this parcel. Also, fused ordnance may be present at this parcel. Parcel 147Q-X was a former impact area. Fused ordnance may also be present at this parcel. The report states that the most significant contaminant of potential concern is lead. As with several other ranges at Fort McClellan, the presence of lead bullets and bullet fragments 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 Choccolocco Corridor. 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.



Mr. Ronald M. Levy
January 9, 2004

If you have any questions or concerns regarding this matter please contact Mrs. Brandi Little at 334-274-4226 or via email at blittle@adem.state.al.us.

Sincerely,



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

Enclosure

SAC/BCL/:L:Gov Fac Sec/Stroud/Fort McClellan/ADEM-EPA Comments, Draft SI for Parcels 97Q, 144Q-X and 147Q-X, April 30, 2003.doc

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Lee Coker/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
Mr. Philip Stroud/ADEM
Ms. Shana Decker/ADEM
Ms. Kristy Wright/ADEM
Mr. Richard Cumbie/Alabama Forestry Commission

File: Land Division/Hazardous Waste/Fort McClellan/Correspondence/2003

ATTACHMENT

ADEM and EPA Review Comments
On Fort McClellan's Draft Site Investigation Report for Former Range 43,
Parcel 97Q, Range, Choccolocco Corridor, 144Q-X and Impact Area,
Choccolocco Corridor, Parcel 147Q-X
Fort McClellan, Alabama

General Comments

1. Throughout the document, figures illustrating analytical results indicate up to eight significant digits for the SSSL values making it difficult to read and compare. The number of significant figures should be consistent.
2. Figure 3-1: This figure illustrates sampling locations for groundwater, surface soil, subsurface soil, and depositional soil samples taken during the site investigation. One sampling location (HR-147Q-MW02) was noted in Table 3-1 as being the only groundwater, surface soil, and subsurface soil sampling location. According to Figure 3-1, HR-147Q-MW02 is correctly identified, but HR-144Q-MW01 and HR-147Q-MW01 are identified similarly. Please revise the figure to identify these two sampling locations as subsurface and surface soil locations only, not groundwater locations.
3. Figure 5-2: On this figure, sample location HR-144-DEP04 illustrates lead and selenium concentrations above their respective ecological screening values (ESVs) and background values. Depositional soils downgradient of this site could also be impacted by these metals. ADEM and EPA recommend that the potential for off-site migration of these metals be examined during the RI phase of work.
4. Figure 5-2: On this figure, sample location HR-144-GP04 illustrates nine metals which exceed their respective ESVs and background values. According to the figure, this sampling location is off-site. Due to the metals present and their concentrations, the potential extent of contamination has not been fully delineated. ADEM and EPA recommend that this area be further addressed in the RI site work.
5. Appendix A: The reason for using chain of custody (COC) forms is the ability to reconstruct the custody of the samples from time of collection until time of receipt by the analytical laboratory. Signatures must be present at the appropriate location on the appropriate forms. The sampling records in this appendix will not allow for the reconstruction of the COC for the following reasons:
 - On all but one sample collection log (SCL), the sampling team members printed, but did not sign, their names.

Mr. Ronald M. Levy

January 9, 2004

- On the remaining SCL, the sampling team members were not identified.
- The name of the person who signed the "Relinquished By" block on all of the COC forms does not appear on the SCLs.
- On one of the COC forms, the "Relinquished By" block contains a printed name, not a signature.
- On four of the COC forms, both the "Relinquished By" blocks and "Received By" blocks contain printed names, not signatures.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

May 10, 2004

EMAIL & US MAIL

4WD-FFB

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

SUBJ: Final Site Investigation Report, Former Range 43, Parcel 97Q; Range Choccolocco Corridor, Parcel 144Q-X; and Impact Area, Choccolocco Corridor, Parcel 147Q-X
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject document. EPA agrees that a Remedial Investigation is needed but disagrees with limiting it to the soil. The Remedial Investigation needs to adequately consider all environmental media. If you have any questions, please call me at (404) 562-8549.

Sincerely,

Doyle T. Brittain
Senior Remedial Project Manager

cc: Lisa Holstein, Ft. McClellan
Philip Stroud, ADEM
Lee Coker, USA/COE
Jeanne Yacoub, Shaw Environmental
Daniel Copeland, CEHNC-OE-DC
Bernie Case, ALANG
Miki Schneider, JPA