

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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MONTGOMERY, ALABAMA

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JAMES W. WARR

DIRECTOR

BOB RILEY

GOVERNOR

June 14, 2004

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

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Water: 279-3051
Groundwater: 270-5631
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Laboratory: 277-6718
Mining: 394-4326
Education/Outreach: 394-4383

RE: ADEM reply to Department of the Army letter dated May 20, 2004, regarding ADEM's LUCIP Submittal Request for the Water Supply Wells on Pelham Range

Fort McClellan, Calhoun County, Alabama
Facility I.D. No. AL8 213 700 000
DSMOA Fund Code 535-232-0445

Dear Mr. Levy:

ADEM's May 6, 2004 concurrence letter regarding the Water Supply Wells on Pelham Range stated that "no further investigative action" is necessary at the water supply wells. The NGB has already implemented the administrative Land Use Controls (LUCs) by installing "non-potable water" signs at each of the outlets to each water supply well in question. ADEM also requested a Land Use Control Implementation Plan (LUCIP) which would provide documentation of the LUCs being used, provide a plan to maintain said institutional LUCs, and provide documentation on future land owners' real property records that the site groundwater may not be suitable for groundwater consumption. The Army objected to ADEM's requirements by stating that the Water Supply Wells do not require LUCs, or a LUCIP.

The intent of a LUCIP is to ensure long term maintenance of the institutional controls currently in place at the Water Supply Wells. Because the Army is not remediating the Water Supply Wells water to unrestricted land use levels (e.g., as public drinking water), LUCs are required to ensure controls remain in place indefinitely. The Army states that the issues outlined in ADEM's comments to the Final Water Supply Well Report for Pelham Range, Rev. 1 (dated May 6, 2004) are related to requirements under the Safe Drinking Water Act. The Land Division is not aware of any Safe Drinking Water Act regulations imposed on these Pelham Range wells.

In the *Final Decision Document for the Water Supply Wells at Pelham Range* dated May 11, 2004, the Army states that the wells are released for unrestricted land reuse with regard to CERCLA related hazardous substances. The Department agrees that no CERCLA related hazardous substance has been left in place at the wells; however,

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Mobile Branch
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Mobile - Coastal
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thallium is present in the SOTS Administrative Building 8203 water supply well at levels exceeding the SSSL, background, and MCL levels. Because the well water is unsuitable for drinking, the wells are *not* unrestricted, they require "non-potable water" signs at each outlet, and therefore LUC's are required. In addition, ADEM notes that some level of future monitoring may be required at the contaminated well.

The Army or NGB does not provide assurance that the signs will remain in place, via a deed notice or other permanent record, which is readily available to a researcher upon transfer, sale, or change of status of the property at some point in the future. The "No Further Action" determination cannot be enacted without a LUCIP to properly document the use of land use controls.

For any questions or concerns regarding this matter, please contact Ms. Shana Decker via email at sdecker@adem.state.al.us or at (334) 270-5684.

Sincerely,



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

SAC/JWG/SD/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mr. David Bush/ADEM
Mr. Bernie Case/NGB
Mr. Lee Coker/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
Maj. Kim O'Keefe/NGB
Mr. Philip Stroud/ADEM

File:Land Div/Hazardous Waste/Fort McClellan/AL8213700000/Correspondence/2004



REPLY TO
ATTENTION OF

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

May 20, 2004

Environmental Office

Mr. Stephen A. Cobb
Alabama Department of Environmental Management (ADEM)
Governmental Hazardous Waste Branch, Land Division
P.O. Box 301463
Montgomery, Alabama 36130-1463

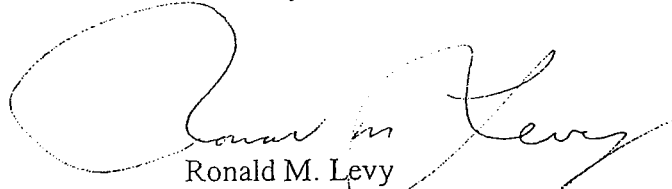
Dear Mr. Cobb:

I am in receipt of your letter dated May 6, 2004, regarding your request for submittal of a Land Use Control Implementation Plan (LUCIP) on the water supply wells located on Pelham Range. The issues outlined in the letter serve to protect human health but do not require land use controls or a LUCIP. They are related to requirements under the Safe Drinking Water Act and are being addressed as such by the Army and the Army National Guard.

Copies of this correspondence have been furnished to Mr. Doyle Brittain, Environmental Protection Agency Region 4; Mr. David Bush, ADEM; Mr. Bernie Case, Fort McClellan Army National Guard Training Center; Mr. Lee Coker, Corps of Engineers, Mobile District; Mr. Jim Grassiano, ADEM; and Maj. Kim O'Keefe, National Guard Bureau.

If you wish to discuss this matter please contact me at 256-848-6853. You may also contact Mr. Bernie Case (256-847-4373) or Mr. Paul James (256-847-4592) at the Fort McClellan Army National Guard Training Center.

Sincerely,



Ronald M. Levy
BRAC Environmental Coordinator

ADEM



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May 6, 2004

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RE: ADEM Notice of Concurrence;
ADEM Request for Submittal of LUCIP
Final Water Supply Well Report for Pelham Range, Response to Comments, dated
March 8, 2004
Fort McClellan, Calhoun County, Alabama
Facility ID No. AL8 213 700 000

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the subject submittal addressing ADEM's review of the May 21, 2003 report entitled *Final Water Supply Well Report for Pelham Range*. ADEM's review comments on the Final Report were sent to the Army via letter dated February 3, 2004.

The Department understands that Ft. McClellan has already implemented certain physical Land Use Controls (LUCs) to prevent the ingestion of the non-potable water at the Pelham Range wells addressed in the report. The LUCs implemented include signs providing notice of "non-potable" water at the well houses and at the building entrances, and also located above the kitchen faucet inside the SOTS Administration Building and other buildings that use the water from these wells. Ft. McClellan is reportedly also providing bottled water to military personnel on Pelham Range at the areas that are served by the wells and is reportedly only using the water from these wells for flushing restroom facilities, watering grass, and cleaning vehicles.

ADEM personnel Shana Decker, David Bush, Deirdra Hahn, and Philip Stroud conducted a site visit to Pelham Range on April 28, 2004 and observed the effectiveness of the land use controls implemented at each of the facilities which use the water supply wells. Overall, the "non-potable water" warning signs are very visible and in good condition at the well houses and main entrances of the buildings using this water, and on each of the outdoor water spigots connected to the wells. Bottled water for drinking was observed at the facilities. However, there were some deficiencies which will require correction to allow ADEM to approve Land Use Controls at the water supply wells. (1) At Range 59 next to the latrines,

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Mr. Ronald M. Levy
May 6, 2004

there was a new spigot installed which did not have a "non-potable water" sign in place at the time of the visit. Water from this new spigot is meant for cleaning the nearby latrines. ADEM personnel were told that a sign would be put up soon. (2) Across the road from the SOTS Administration Building, there is an area where tractors and land maintenance equipment is stored and maintained. This building uses the non-potable water from the SOTS Administration building, and signs are posted on the back door and on the spigot outside the building, but not on the front door. Signage should be posted on all entrances of the building. (3) At the SOTS Administration building and at the aforementioned building across the street, the signs over all faucets (the kitchen sink and bathrooms) did not have adequate permanent signage. At the SOTS Administration building, ADEM personnel observed a piece of paper taped to the wall over the sink and a similar sign in a picture frame at the building across the street stating that the water is non-potable. All non-potable water signs inside the buildings should be made permanent and attached to the wall so they cannot be easily removed.

ADEM concurs that no further investigative action is required at the water supply wells at this time. The Department understands that the Pelham Range property will be transferred to the National Guard Bureau in the coming months, and the Land Use Control measures will become their responsibility. To ensure that the water remains truly limited to non-potable usage, ADEM requires that the Army submit a site-specific Land Use Control Implementation Plan describing Fort McClellan's approach to the implementation and maintenance of LUCs on this property. Please submit the LUCIP within 45 days from the date of receipt of this letter.

For any questions or concerns regarding this matter, please contact Ms. Shana Decker via email at sdecker@adem.state.al.us or at (334)-270-5684.

Sincerely,



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

SAC/CHC/SD/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mr. David Bush/ADEM
Mr. Bernie Case/NGB
Mr. Lee Coker/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
Maj. Kim O'Kieffe/NGB

File:Land Div/Hazardous Waste/Fort McClellan/AL8213700000/Correspondence/2004



REPLY TO
ATTENTION OF

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

March 8, 2004

Environmental Office

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

Dear Mr. Stroud:

Enclosed are responses to Alabama Department of Environmental Management (ADEM) comments on the Final Water Supply Well Report for Pelham Range, Revision 1. Request your office provide a letter of concurrence on this document.

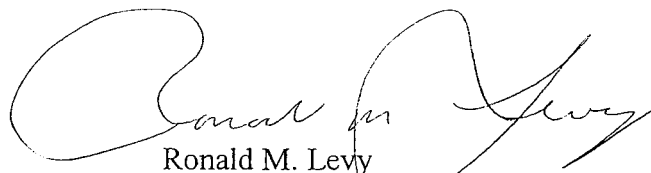
These responses were reviewed during the March 3, 2004 BCT conference call. Following discussions to clarify ADEM concerns regarding use of the water supply wells, ADEM accepted the responses as written. These responses do not involve any changes to the subject document.

To reiterate discussions during the conference call, the water supply wells are not used for potable water. Bottled water is provided to all military personnel. Signs stating "Non-potable Water" are posted at all well houses, building entrances, and inside the SOTS Administration building above the kitchen faucet. Water from the wells is used only for flushing restroom facilities, watering grass, and cleaning vehicles.

Copies of this memorandum with enclosures have been provided to Mr. Doyle Brittain, Environmental Protection Agency Region 4, Ms. Vicki Strause, National Guard Bureau, Mr. Mike Kelly, Army Environmental Center, LTC David McPherson, Alabama Army National Guard Training Center, and LTC Brian Barrontine, Alabama Army National Guard.

If further information is required or you have questions regarding this submittal, please contact Mrs. Lisa Holstein at (256) 848-7455.

Sincerely,



Ronald M. Levy
BRAC Environmental Coordinator

Enclosure

**Response to Alabama Department of Environmental Management Comments
On the Final Water Supply Well Report for Pelham Range (Revision 1)
(Dated May 21, 2003)
Fort McClellan, Calhoun County, Alabama**

Comments from Stephen A. Cobb, Chief, Governmental Hazardous Waste Branch, Land Division, dated February 3, 2004.

Comment 1: The Army did not state in the report whether the water supply wells supplied drinking water or non-potable water. The wells were equipped with an in-line potassium hypochlorite system, which presumably was used to treat the water for drinking. The water from SOTS water supply well was collected from a kitchen faucet inside the facility, apparently this is drinking water. The Army should revise the report to clarify this issue.

Response 1: Comment noted. None of the wells are used for potable water (i.e., drinking water); they are designated as "water supply" wells. This distinction has been discussed in numerous BCT meetings. However, the Army has no plans for reissuing the document at this time.

Comment 2:

Thallium	WSW-SOTS-ADM	
Result	6.14 x 10 ⁻³ mg/L	6 ppb
BKC	1.46 x 10 ⁻³ mg/L	1.5 ppb
SSSL	1.02 x 10 ⁻⁴ mg/L	0.1 ppb
MCL	2 x 10 ⁻³ mg/L	2 ppb

Thallium level in well WSW-SOTS-ADM is 4X the background value, 60X the SSSL, and higher than the Maximum Contaminant Level (MCL) for drinking water. Thallium MCL for drinking water is 2 ppb, this sample contains 6 ppb thallium.

If thallium is detected in drinking water supplies above the MCL, then it is required to be monitored every 3 months. If it is consistently above the MCL, then steps must be taken to reduce the amount of thallium in the water. When people are exposed to thallium in drinking water, short term health effects include gastrointestinal irritation and nerve damage. Long term (lifetime) exposure can cause changes in blood chemistry, hair loss, and damage to kidneys, liver, intestinal, and testicular tissues.

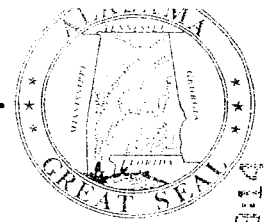
The Army took this SOTS Administration building sample from a water hose in October of 2000, and no further samples were taken. Unlike some other samples in this study, the sample had zero turbidity, therefore, the metal concentration should not be skewed to the high side. Even though

this value is estimated, it appears the Army found the thallium to be higher than all the screening levels.

The Army should explain why no further action is warranted for this well.

Response 2: Comment noted. The BCT made a risk management decision for NFA at the April 2003 meeting (originally, the BCT agreed to NFA at the May 2001 meeting). This decision was based on the following points:

- The water supply wells are not used for potable water; therefore, drinking water requirements are not applicable.
- The concentration is J-flagged indicating that the concentration is estimated and therefore a lower confidence level is associated with the result. The limitations of the analytical method (SW 6010B) at concentrations this low are significant.
- There are no known sources or historical uses of thallium at Pelham Range.



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February 3, 2004

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Education/Outreach: 394-4383

RE: ADEM Review Comments

Final Water Supply Well Report for Pelham Range, dated May 21, 2003
Fort McClellan, Calhoun County, Alabama
Facility ID No. AL8 213 700 000

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the Final Water Supply Well Report for Pelham Range. Enclosed are ADEM comments for your review and written response to the Department. Please submit response comments to the Department within 45 days from the date of receipt of this letter.

For any questions or concerns regarding this matter, please contact Ms. Shana Decker via email at sdecker@adem.state.al.us or at (334)-270-5636.

Sincerely,

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

Enclosure

SAC/CHC/SD/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Bernie Case/NGB
Mr. Lee Coker/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
Mr. Philip Stroud/ADEM
Ms. Vicki Strause/NGB

File: Land Div/Hazardous Waste/Fort McClellan/AL8213700000/Correspondence/2004



ADEM Review Comments
Final Water Supply Well Report for Pelham Range
Fort McClellan, Alabama

General Comments

1. The Army did not state in the report whether the water supply wells supplied drinking water or non-potable water. The wells were equipped with an in-line potassium hypochlorite system, which presumably was used to treat the water for drinking. The water from SOTS water supply well was collected from a kitchen faucet inside the facility, apparently this is drinking water. The Army should revise the report to clarify this issue.

2.

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The Army should explain why no further action is warranted for this well.