

ADEM



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US

(334) 271-7700

JAMES W. WARR

DIRECTOR

November 14, 2001

DON SIEGELMAN

GOVERNOR

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

RE: **ADEM Review and Concurrence:** *Final Site Investigation for Site-Specific Field Sampling Plan, Site-Specific Safety and Health Plan, and Site-Specific Unexploded Ordnance Safety Plan Attachments for Range 23A, Multipurpose Range, Parcel 109(7)/152Q-X, dated October 2001, Fort McClellan, Calhoun County, Alabama*

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the subject document entitled *Final Site Investigation for Site-Specific Field Sampling Plan, Site-Specific Safety and Health Plan, and Site-Specific Unexploded Ordnance Safety Plan Attachments for Range 23A, Multipurpose Range, Parcel 109(7)/152Q-X, dated October 2001.*

The subject document was discussed during the Base Realignment and Closure Team (BCT) meeting on August 21, 2001. During the BCT meeting, the Department provided its comments on the document in an interactive manner such that the Army and BCT stakeholders could jointly resolve the Department's comments. The Department's comments are noted in the documented minutes of this meeting. It is important to note that the title of this sampling plan is referring to Range 23A which is a multipurpose range and is considered Parcel 109(7)/152Q-X. Range 23A was assigned 2 separate parcel designations in the Environmental Baseline Study (EBS). Neither is a subparcel of the other. On one hand, it was assigned as a Category 7 Community Environmental Response Facilitation Act (CERFA) site (Parcel 109[7]) which is a parcel where site-specific chemicals were stored and possibly released into the environment, or disposed of on site and where the lack of adequate documentation necessitates additional evaluation to determine the environmental condition of the property. On the other hand, Range 23A was assigned as a non-Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site based on other environmental or safety issues. In the case of Range 23A, the range activities make UXO a safety concern and therefore the site was also assigned as Parcel 152Q-X, with "X" designating the parcel for potential UXO. Because of both potential CERCLA and non-CERCLA issues, the site was assigned as Parcel 109(7)/152Q-X. The letter "Q" designates the parcel as a Community Environmental Response Facilitation Act (CERFA) Category 1 Qualified Parcel.

An overview of the discussion that took place during the August BCT meeting is presented below. The following is a paraphrased narrative of the meeting minutes issued by IT Corporation (IT) on September 24, 2001:

Birmingham Branch
110 Vulcan Road
Birmingham, Alabama 35209-4702
(205) 942-6168
(205) 941-1603 [Fax]

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, Alabama 35603-1333
(256) 353-1713
(256) 340-9359 [Fax]

Mobile Branch
2204 Perimeter Road
Mobile, Alabama 36615-1131
(251) 450-3400
(251) 479-2593 [Fax]

Mobile - Coastal
4171 Commanders Drive
Mobile, Alabama 36615-1421
(251) 432-6533
(251) 432-6598 [Fax]



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Range 23A, Multipurpose Range: Parcel 109(7)/152Q-X- This site comprises 41-acres in north-central Pelham Range, specifically the area in front of the bleachers. Army engineers trained in demolition procedures at this site. The "Hasty Mine" area is included in this parcel. This mine training area is an anti-personnel training area where Clay-more mines have historically been used. The Alabama Army National Guard (Guard) provided detailed and helpful explanations of the different types of training that occurred under its direction in the entire parcel area. This site also presently contains 29 investigation-derived waste (IDW) drums from a previous investigation completed by CH2M Hill in 2000. The drums are all identified in terms of where the IDW originated.

CH2MHill submitted a Site Investigation Report showing metals, semivolatile organic compounds (SVOCs), Total petroleum hydrocarbons (TPH), and explosives in soils. The Army also constructed a sediment retention pond to try to control runoff from the site. IT's proposed plan reflects CH2MHill's report and subsequent recommendations. The Army indicated that this is an active range, even though there will be no further "Wall of Flame" or "nuke simulation" Training. Only Guard demolition training will occur at this site in the future. The U.S. Environmental Protection Agency (USEPA) expressed its concern about the sedimentation pond, the wetland area, and the receiving surface water or creek as it exits the parcel. ADEM wants data on groundwater flow. The Guard indicated that, if necessary, it would coordinate range operations to accommodate well installation. The Guard wants additional sample collection for volatile organic compounds (VOCs), SVOCs, explosives and metals. The BCT agreed to the supplemental SI activities requested by EPA, ADEM, and the Guard. Therefore, IT will install four monitoring wells, collect 11 surface soil samples, 11 subsurface soil samples, four groundwater samples, and six sediment samples at Range 23A. Chemical analyses of all media samples collected during the additional field sampling program will include VOCs, SVOCs, nitroaromatic/nitramine explosives, and metals. In addition, sediment samples will be analyzed for total organic carbon (TOC) and grain size. The TOC and grain size was requested by the Guard for potential future remedial goals.

Because the Department provides its review comments in an interactive manner prior to Fort McClellan's development of the submittal, the October 2001 submittal was developed to account for ADEM's comments. As such, the Department concurs with the BCT's recommendations and specific sampling locations and protocols presented in the Final Site Investigation Plan.

Mr. Ronald M. Levy
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For any questions or concerns regarding this matter please contact Mr. Philip Stroud at 334-270-5646 or via email at pns@adem.state.al.us.

Sincerely,



Stephen A. Cobb, Chief
Hazardous Waste Branch
Land Division

SAC/ps

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Ellis Pope/USA COE, Mobile District
Mr. Jim Grassiano/ADEM

File: ADEM Land Division/Hazardous Waste Branch/Fort McClellan, Correspondence, 2001