U.S. Army Training and Doctrine Command

ACTION MEMORANDUM

Chemical Warfare Materiel (CWM) Engineering Evaluation and Cost Analysis Fort McClellan, Alabama

INTRODUCTION

The purpose of this Action Memorandum is to document the U.S. Army's decision regarding the selected risk-reduction alternatives to address chemical warfare materiel (CWM) at Fort McClellan, Alabama. No Further Action (NFA) achieves the objective of public health and safety and is the selected CWM response alternative for each of the 33 sites evaluated.

The DoD may address CWM hazards on closed, transferring, and transferred (CTT) military ranges using the Engineering Evaluation/Cost Analysis (EE/CA) process that is described in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300.120d, 40 CFR 300.415).

The response actions described in this Action Memorandum are based on the EE/CA and on input from stakeholders, where given, and are documented in the Administrative Record. As the primary decision document, the Action Memorandum becomes a critical component of the Administrative Record, required by Section 113(k) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

Fort McClellan is an 18,929-acre site located in Calhoun County, Alabama that was used by the Department of the Army for ordnance and chemical weapons training and other military exercises. During various periods of operations from the 1950's until the 1990's, training involving the use of chemical agents was conducted at Fort McClellan. Thirty-three locations were identified for evaluation, some of which involved the use of chemical agents.

In September 1999, the current mission of Fort McClellan ended with the post being closed under Base Realignment and Closure (BRAC) as recommended by the 1995 Defense Base Closure and Realignment Commission in conformance with Public Law 101-510, as amended, the Defense Base Closure and Realignment Act. According to the local reuse authority's reuse plan, the proposed future land use for the 33 sites includes recreational, transportation, commercial, mixed use, development reserve, and institutional.

The Chemical Warfare Materiel EE/CA Fort McClellan, Alabama, March 2002, presented the information for 33 sites that were evaluated for CWM contamination or breakdown products. The EE/CA incorporated information from various other evaluations of the sites to include the Archives Search Report, September 2001, and includes references for those evaluations. The EE/CA determined there was sufficient information available for 14 sites to demonstrate the absence of chemical agents without further investigation. The remaining 19 sites were investigated using geophysical methods, soil sampling and analysis, and/or excavation; and no residual chemical agent or agent degradation products were detected in the soils at sites sampled. The CWM EE/CA report documented a NFA decision for CWM based on a qualitative risk evaluation for the sites. Some of the sites have overlapping ordnance and explosives/unexploded ordnance (OE/UXO) concerns that are under investigation and will be reported in other documents upon completion of those investigations.

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An EE/CA was conducted at these 33 sites to determine whether any CWM or related chemical agent contamination remains at these sites, compare risk management alternatives, recommend response action alternatives, and document the selected alternative for each of the sites. The EE/CA investigation conducted at Fort McClellan indicated

that there are no known sources of chemical agent remaining in the environment and therefore the likelihood of any public exposure to chemical agents is unlikely.

NFA is the selected CWM response alternative for each of the 33 sites at Fort McClellan, Alabama. NFA is defined as no treatment, no engineering controls and no land use controls. However, it is important to note that the government will respond to any future CWM discovery regardless of whether the sites were designated as NFA. A map depicting the 33 sites within Fort McClellan is presented in Figure 1.

STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected action which was chosen under a process consistent with CERCLA. The Corps of Engineers chemical warfare materiel response program at Fort McClellan addresses the detection and disposal of CWM which if present, may pose an imminent and substantial endangerment to the public health, welfare, or the environment. The decision process is consistent with the NCP.

The response actions described in this Action Memorandum are based on the EE/CA and on input from stakeholders. They are documented in the Administrative Record. A copy of the EE/CA is available in the Information Repositories located at the Anniston Calhoun County Library, 108 E. 10th Street, Anniston, AL 36201 and the Houston Cole Library on the 9th Floor, Jacksonville State University, 700 Pelham Rd, Jacksonville, AL 36265.

The Environmental Protection Agency, Region 4 (EPA) and the Alabama Department of Environmental Management (ADEM) have concurred with the selected alternative.

Chemical warfare training activities historically conducted at Fort McClellan included confidence training, shell tapping and agent transfer, and decontamination and reaction training. Based on the results of the completed EE/CA, a NFA response action for CWM is recommended for each of the 33 sites. Conventional OE and/or hazardous, toxic, and radioactive wastes (HTRW) investigations may be conducted at some of these sites.

PROJECT JUSTIFICATION

Results of the EE/CA investigation showed that CWM and related chemical agent contamination and their breakdown products were not present at the 33 sites evaluated and are consistent with what is known about the decontamination training practices that were historically used at Fort McClellan. The public has unrestricted access to all of the sites, except for sites T-38 and Training Area 24A which are fenced.

The results from a qualitative risk analysis indicate the risk of public exposure to CWM or chemical agents is very unlikely; therefore, the NFA response alternative for CWM achieves the objective of protection of public health and safety.

Scrap materials resulting from CWM training exercises such as inert ordnance items and containers remaining at Sites T-38 and Training Area 24A should be managed as 3X waste. Although no chemical agents were detected during the investigation, under Army Regulations, 3X waste must be incinerated to destroy any potential residual agent. The Department of the Army has developed procedures that can be used for risk management at sites such as T-38 and Training Area 24A. These procedures were applied to determine whether the Army could conduct follow-on activities at these locations as if they were non-CWM sites. The results of applying that guidance to these sites indicated that the probability of encountering CWM was remote and therefore these sites and any remaining scrap resulting from CWM training activity can be addressed under follow-on HTRW investigations. This additional risk management process is discussed further in Sections 7 and 18 of the EE/CA Report.

ALTERNATIVES CONSIDERED

The CWM findings during this EE/CA demonstrated that the risk of public exposure to chemical agents at the 33 sites is very unlikely. Because these sites present no unacceptable risk, no response actions are required to meet the CERCLA criterion of protectiveness. Therefore, evaluation of response alternatives was not necessary.

HIGHLIGHTS OF COMMUNITY PARTICIPATION

A public meeting was held on March 19, 2002, at the Anniston Meeting Center to present the conclusions and recommendations of the EE/CA to the public and to address any public concerns. The 30-day period for public comment ran from March 13 to April 11, 2002.

Fort McClellan established the Restoration Advisory Board (RAB) in 1995 to enable the affected communities and representatives of Government agencies to meet and exchange information about Fort McClellan's environmental cleanup program. The RAB meets on a monthly basis to review and advise

the Army on restoration activities for the Fort McClellan cleanup. The RAB has participated in the EE/CA process and was invited to the public meeting. The Army updated the RAB on the status of the CWM EE/CA action through its monthly meetings and provided the EE/CA results and recommendations at the meeting held on March 18, 2002.

All public involvement requirements for the EE/CA project have been satisfied.

COORDINATION SUMMARY

Project activities for the Fort McClellan EE/CA have been coordinated with both the EPA and ADEM. EPA and ADEM reviewed all phases of the EE/CA project from Work Plan/Site Safety Submission through fieldwork to the draft and final EE/CA Report.

SELECTION CRITERIA

Because there was no basis for CERCLA removal or remedial actions at the 33 sites, there was no need for any selection criteria to evaluate response alternatives.

DESCRIPTION OF SELECTED REMEDIES

The NFA response alternative achieves the objective of the protection of public health and safety from chemical warfare agents. Implementation of a recurring review program for CWM is not required at the 33 sites evaluated in this EE/CA because no chemical agents were found. No other long-term monitoring activities are required.

TRADE OFF ANALYSIS

The alternative recommended for each of the 33 sites is the best alternative for each of these sites as determined by the EE/CA Report.

DOCUMENTATION OF SIGNIFICANT CHANGES

As the probability of current and future risk of public exposure to chemical agents is very unlikely, there is no potential for substantial endangerment to public health, welfare, and the environment if the actions outlined in this Action Memorandum are delayed or not taken.

RESPONSIVENESS SUMMARY

The public meeting of March 19, 2002, was attended by a dozen people including the Mayor of Anniston and an Anniston City Councilman. There were two comment sheets received and all comments have been considered.

RECOMMENDATION AND APPROVAL

This Action Memorandum decision document represents the selected risk-reduction alternative for the 33 CWM EE/CA sites on Fort McClellan in Calhoun County, Alabama. The selected risk-reduction alternative has been developed in a manner consistent with CERCLA, as amended, and with the NCP. This decision is based on the administrative record for this site.

Approval of the response action is included in the signature box below.

SITE AND LOCATION

Fort McClellan is an inactive U.S. Army post located in Calhoun County, Anniston, Alabama.

DESCRIPTION OF THE SELECTED REMEDY

As described in this Action Memorandum, the CWM response alternative for the 33 sites is based on existing site conditions and an understanding of the projected land use, and represents conclusions based on data developed for the area. No Further Action is the selected CWM response action alternative for these sites.

DECLARATION

This decision represents the selected risk reduction alternative for CWM for the 33 sites on Fort McClellan in Calhoun County, Alabama. The selected risk reduction alternative has been developed in a manner consistent with CERCLA, as amended, and the NCP. This decision is based on information contained in the Administrative Record for this site. This document has been approved by the undersigned.

Glynn D. Ryan, Site Manager

18 oct 2002
Date

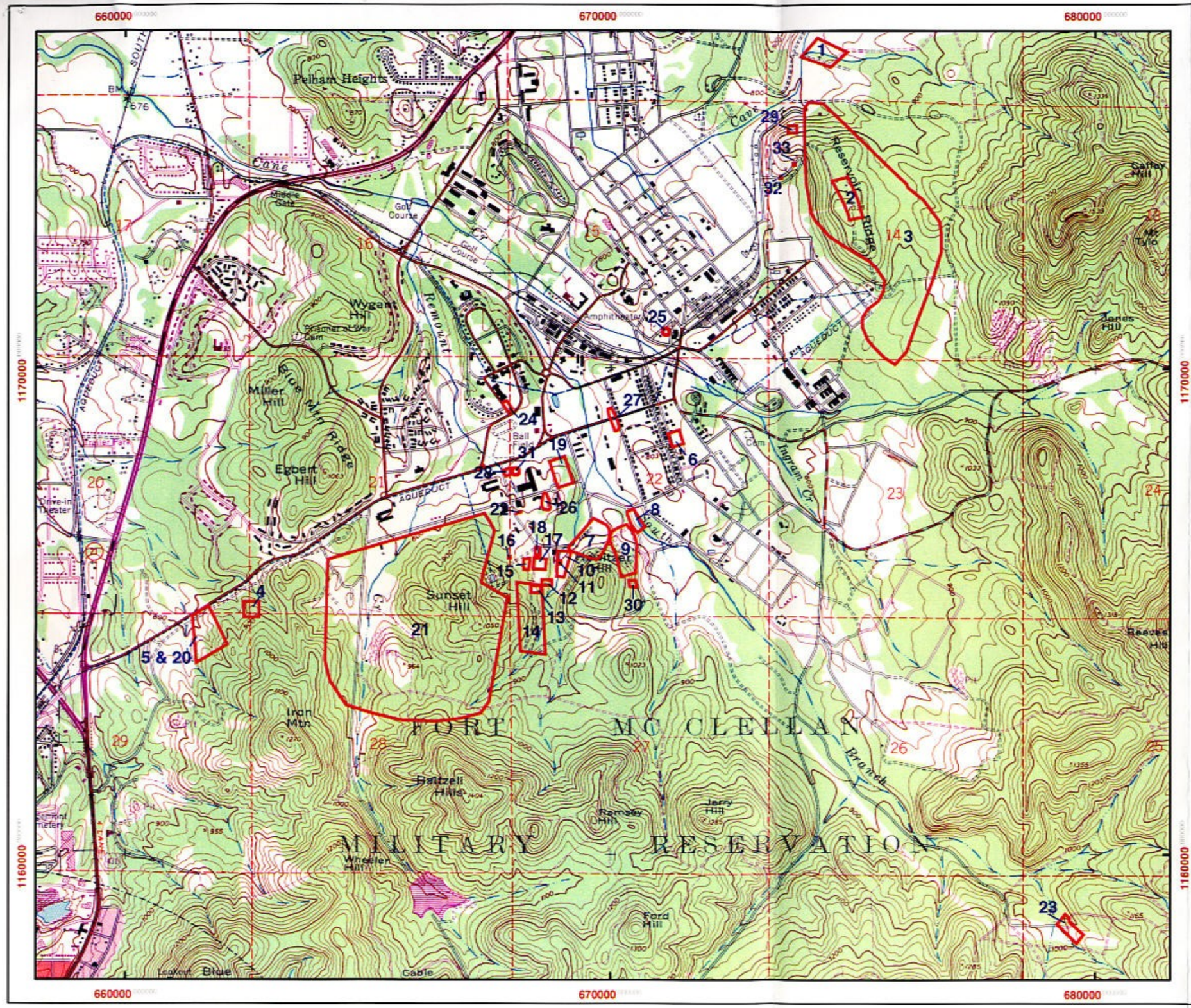

Figure 1

CWM EE/CA SITE LOCATION MAP

No.	Site ID
1	Training Area 31
2	T-38 (Reservoir Ridge)
3	Smoke Ranges R & S
4	T-4 Biological Warfare Area
5	Old Chemical Weapons Demo Area
6	Agent ID Area
7	Sandell Field
8	Cane Creek Training Area
9	Naylor Field
10	Blacktop Training Area
11	Fenced Yard in Blacktop Area
12	Dog Training Area
13	Dog Kennel Area
14	Reaction Area T-5
15	Detection and Identification Area
16	Old Burn Pit
17	Field Personnel Decontamination Area
18	Decontamination Building 3185
19	Chemical, Biological, and Radiological Proficiency Area
20	South Gate Toxic Gas Yard
21	Sunset Hill Area
22	Old Toxic Training Area
23	Training Area 24A
24, 25, 26, 27, 31	Mustard Spills
28, 29, 30	Goat Yards
32	Building 4415 (Igloo13)
33	Building 4416 (Igloo 14)
	Site Boundary

Source: US Geological Survey Topographic Map
Anniston 1972

0 1,000 2,000 4,000 6,000 Feet

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DESIGNED BY: MAD	FORT McCLELLAN ANNISTON, ALABAMA CALHOUN COUNTY		
DRAWN BY: MAD			
CHECKED BY: JC/JU	SCALE: 1 inch equals 2,000 feet	PROJECT NUMBER: 734643	
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October 7, 2002

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

RE: Notice of Concurrence: *Action Memorandum for Chemical Warfare Material (CWM) Engineering Evaluation and Cost Analysis (EE/CA)*
Dated May 16, 2002
Fort McClellan, Calhoun County, Alabama
Facility ID. No. AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management has received and reviewed the comments incorporated into the *Action Memorandum CWM EE/CA*. The Action Memorandum is reportedly intended to document the U.S. Army's decision regarding selected Risk-reduction alternatives to address CWM. However, the Army found no potential risk associated with CWM at the former Fort McClellan. Thus, an evaluation of response alternatives was deemed not necessary by the Army, and the Army designated all 33 potential CWM sites as No Further Action (NFA). The Army stated that NFA achieves the EE/CA objective of ensuring public health and safety regarding CWM; however, potential exposure risks may exist for conventional ordnance and explosives (OE) and/or hazardous, toxic, and radioactive wastes (HTRW). Therefore, further OE and HTRW investigation needs should be defined for these 33 sites.

In accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) public participation requirements, a public meeting was held on March 19, 2002, at the Anniston Meeting Center to present the Army's EE/CA conclusions and recommendations and to address any relevant public concerns. No written or verbal public comments were presented to ADEM on this matter.

The Department concurs that all review comments have been adequately addressed. ADEM also concurs with Fort McClellan's recommendation that the 33 sites be designated as NFA with regard to CWM.

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For any questions concerning this matter, please contact Mr. Philip Stroud at 334-270-5646 or via email at pns@adem.state.al.us.

Sincerely,

Wm. Gerald Hardy, Chief
Land Division

WGH/ps

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Jim Grassiano/ADEM
Mr. Stephen A. Cobb/ADEM

File: Land Division/DSMOA/HW/Fort McClellan/Correspondence, 2002