



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

June 08, 1998

Mr. Ron Levy
Director of Environment
USACMLS and MPCENS and FM
Building 141 A, 13th Avenue
Fort McClellan, Alabama 36205-5000

RE: Environmental Baseline Survey

Dear Mr. Levy

I have reviewed the Environmental Baseline Survey (EBS) dated January 1998. I am in agreement with the determinations of property conditions with the following exceptions:

1. EPA considers all Ranges to be category 7 parcels. The rationale for this position has been presented to the Army on numerous occasions.
2. EPA considers Lead Based Paint (LBP) to be a hazardous material. Accordingly, EPA considers those properties contaminated or potentially contaminated with LBP to also be category 7 parcels.

Should you have any questions or if I can be of any assistance, please contact me at the letterhead address or at 404-562-8541.

Sincerely,

A handwritten signature in black ink, appearing to read "Bart Reedy".

Bart Reedy
EPA Project Manager

cc: Lisa Kingsbury, FTMC
Chris Johnson, ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR
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May 27, 1998

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Ronald M. Levy
Directorate of Environment
USACMLS & MPCENS & FM
Building 141A, 13th Avenue
Fort McClellan, Alabama 36205-5000

**RE: Final Environmental Baseline Survey (January 1998)
Base Realignment and Closure Program
Fort McClellan, Alabama**

Dear Mr. Levy:

The Alabama Department of Environmental Management has received and reviewed the Final Environmental Baseline Survey (EBS) for Fort McClellan dated January 1998. The Department concurs with the majority of the submittal with the following exceptions.

1. According to CERCLA, as amended by CERFA, the Army is responsible for "identifying real property on which no hazardous substances and no petroleum products or their derivatives were stored for one year or more, known to have been released, or disposed of." The January 1998 EBS concludes that no areas within the ranges contain hazardous substances, petroleum products or their derivatives. The Department argues that there are both known and potential releases of hazardous substances and petroleum products within the ranges of Main Post and Choccolocco Corridor. An example of a known release would be lead in soils within the pistol ranges, or explosives in soils and sediment, such as TNT or RDX, from artillery fire within the ranges. The Department is unclear as to how the Army intends to identify, investigate, and remediate (if deemed necessary) areas containing known or potential hazardous substances and petroleum products or their derivatives within the ranges. Our position is that ranges are not excluded from requirements set forth in CERCLA, CERFA and the NCP.



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2. Lead-Based Paint in soils will be regulated as a CERCLA hazardous substance. All parcels that are suspect of containing LBP in soils shall be delineated and defined as a CERFA Category 7. If investigations within these areas reveal that human health and/or the environment have been impacted, then the appropriate remedial efforts should be taken to mitigate such impacts.

For any questions or concerns regarding this matter, please contact me at 334-271-7789 or facsimile at 334-279-3050.

Sincerely,



Christopher L. Johnson
Governmental Facilities Section
Hazardous Waste Branch
Land Division

CLJ/tc

Enclosure

cc: Bart Reedy, EPA Region IV