



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

MONTGOMERY, ALABAMA 36130-1463

WWW.ADEM.STATE.AL.US

(334) 271-7700

JAMES W. WARR
DIRECTOR

DON SIEGELMAN
GOVERNOR

July 5, 2000

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

Ronald M. Levy
BRAC Environmental Coordinator
Environmental Office, Bldg. 215, 15th Street
US Army Garrison
Fort McClellan, Alabama 36205-5000

RE: ADEM's Concurrence on the Human Health and Ecological Screening Values and PAH Background Summary Report, March 2000, Fort McClellan, Alabama

Dear Mr. Levy:

The Alabama Department of Environmental Management has received and reviewed the incorporated comments into the Human Health and Ecological Screening Values and PAH Background Summary Report, March, Fort McClellan, Alabama. We agree that the comments have been adequately addressed. Based on our review, we concur with the submittal and offer no further comments for Army review.

For any questions or concerns regarding this matter please contact me at 334-271-7750 or email at <mailto:pns@adem.state.al.us>

Sincerely,

A handwritten signature in black ink that reads "Philip N. Stroud".

Philip N. Stroud
Governmental Facilities Section
Hazardous Waste Branch
Land Division

PNS/

cc: Bart Reedy, EPA Region 4
Ellis Pope, USAC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4



61 Forsyth Street
Atlanta, Georgia 30303-3104

06/27/00

Mr. Ron Levy
BRAC Environmental Coordinator
U.S. Army Garrison
Environmental Office
Building 215
15th Street
Fort McClellan, Alabama 36205-5000

RE: EPA Position on the Screening Document and PAH issue at Fort McClellan

Dear Mr. Levy,

I am in receipt of an e-mail from your Command dated 06/27/00. That e-mail responds to my response to a former e-mail. In the 06/27/00 e-mail, references are made to my letter to you dated 06/14/00 that requested a few changes in the screening values to be used at Fort McClellan.

Drs. Thoms and Simon are actually standing beside me as I write this. If there was confusion or ambiguity in my 06/14/00 letter to you, I can assure you that my goal was exactly the opposite. We shall now try again to convey our position.

EPA believes that the Army has sufficient information and a sufficiently robust process to screen sites for chemical contamination at Fort McClellan. As the screening process continues, sites at which No Further Action is a clear choice based upon passing the screen should be made available for immediate transfer.

My 06/14/00 letter to you contained comments that attempted to assist the Army and the Public by making the screen less burdensome but still be protective of Human Health and the Environment. Those 06/14/00 comments were, in the words of Drs. Thoms and Simon, intended to "fine tune" the IT screening process and background data used therein.

First we shall speak to the Background PAH issue: although Drs. Thoms and Simon expressed reservations about the PAH background screening levels, EPA believes the levels are acceptable. As I indicated in my 06/14/00 letter to you, we believe the PAH background screening values at Fort McClellan are representative of true background. Therefore we approve the use of the PAH Background Report. Further, we agree that the use of these levels is

appropriate for the *Human Health and Ecological Screening Values and PAH Background Summary Report*. We agree with the values and process as stated in IT's report. As suggested in my 06/14/00 letter, there is still some low level of risk associated with PAH background levels at Fort McClellan. Communicating these risks to the Public in the Decision Document is a choice for the Army to make. EPA concurrence or non-concurrence on site dispensation will not be impacted by the Army decision.

Now we shall clarify our position regarding the Ecological Screening Values. Because Dr. Thoms believes that the PAH background values were high, she suggested an alternate set of screening values to distinguish concentrations potentially posing unacceptable risk. However, because we accept the PAH background screening levels, changing the PAH toxicity screening levels becomes a moot issue. Hence, the PAH Ecological Screening Values are acceptable as written.

Now we shall attempt to clarify our position regarding Human Health Screening. Only the most minor of disagreements exists between Dr. Simon and the Army risk assessors. As previously indicated, Dr. Simon's comments were submitted with the goal of "fine-tuning" the Human Health Screening Values. We believe that the Human Health Screening Levels as proposed in the *Human Health and Ecological Screening Values and PAH Background Summary Report* are acceptable to EPA and should be used at Fort McClellan. Therefore, no changes in the Human Health Screening Levels are needed and the screening process should commence forthwith.

Drs. Thoms and Simon and I look forward to the final version of the *Human Health and Ecological Screening Values and PAH Background Summary Report*.

Should you have any questions, please contact me at the letterhead address or at 404-562-8541.

Sincerely


Bart Reedy

cc: David Treuting, COL, FTMC
Philip Stroud, ADEM