



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

June 7, 2004

REPLY TO
ATTENTION OF

Environmental Office

Mr. Philip Stroud
Alabama Department of Environmental Management
Government Facilities Section
Hazardous Waste Branch, Land Division
1400 Coliseum Blvd.
Montgomery, Alabama 36110-2059

Dear Mr. Stroud:

The review comments on the Draft-Final Site-Specific Work Plan (SSWP) Ordnance and Explosives (OE) Removal Action for the Water Tank Construction Sites in the Bravo Area of Fort McClellan provided in your letter of 9 April 2004 have been reviewed and two copies of the responses to the comments are enclosed. Revisions have been made to the Final SSWP as indicated in the responses to your comments. Two copies of a slip sheet to the SSWP to incorporate the change requested in comment 4 of the 9 Apr letter are enclosed with this response.

Point of contact for this action is Mr. Bill Shanks, (256) 848-3071 or e-mail bill.shanks@us.army.mil.

Sincerely,



Ronald M. Levy
Environmental Coordinator

Enclosures
as

Response to ADEM Review Comments
Draft-Final Site-Specific Work Plan Ordnance and Explosives (OE) Removal Action
for the Water Tank Construction Sites in the Bravo Area
Fort McClellan, Alabama

1. The Department and the Army met on February 2-3, 2004 at ADEM to discuss issues associated with clean-up of munitions and explosives of concern (MEC) at Fort McClellan. In that meeting a discussion of the Army's quality control (QC) process and its QC product was presented to the Department. According to the minutes of this meeting, ADEM revised minutes were submitted to Fort McClellan via e-mail on March 16, 2004. The Army stated: "*The QC process for the task is the responsibility of the contractor and Quality Assurance (QA) is the Corps check of the contractors QC. The QC included both process and product QC. The product QC for a UXO project starts with the GPO using the test grid established on site.*" Please clarify if the referenced QC product and process refer to MIL-STD-1916 and whether or not the proposed MEC work for the water tank construction sites will be conducted in accordance with MIL-STD-1916. If not, please explain. The department believes the implementation of acceptance sampling based on statistically valid sampling plans, such as MIL-STD-1916, rather than rules of thumb or percentages provides for making a defensible and objective decision on the suitability of land parcels or other products offered for public use. Please clarify the geophysical instruments and overall system that the Army proposes to use in its QA process.

Response: The process and product discussed refers to any QA/QC including that performed in accordance with MIL-STD-1916. It is an overall statement about QA/QC. MIL-STD-1916 was applied to the contractor's acceptance sampling on the Water Tank Construction Sites. (See Final Revision 1 of the Final Site-Specific Work Plan Ordnance and Explosives (OE) Removal Action for the Water Tank Construction Sites in the Bravo Area of Fort McClellan sent to your office on 18 May 2004). The Corps of Engineers Safety Specialist used the Schonstedt as his Quality Assurance instrument. The Quality Assurance Surveillance Plan (QASP) for the Water Tank Construction Sites Removal Action was provided by e-mail on 21 May 2004 to ADEM.

2. The Department requests that the Army submit its quality assurance plan (QAP) to ADEM for review and comment, this includes both the site-wide and the site-specific QAP.

Response: The Corps of Engineers does not have a written site-wide quality assurance plan (QAP) but is preparing individual site-specific QAPs that detail what is being done for quality assurance at each site. The government QASP for the Water Tank Construction Sites Removal Action was provided by e-mail on 21 May 2004 to ADEM.

3. The Department understands that the Army will perform a clearance to depth of MEC on the Water Board Sites within the Bravo Area. After the removal of MEC, the Army's contractor will reportedly perform a product QC followed by a second independent QA conducted by the Army. The Department requests that the Army's QA include a MIL-STD-1916 acceptance sampling inspection of the entire footprint of the tank areas to verify the validity of removal process. This inspection will verify that the work performed by the contractors and the Army is valid and/or still in question. The Department requests that the Army explain its definition of "clearance to depth". The Department understands that a valid characterization of the site and a valid depth matrix based on the munitions used at the site should result in a reliable clearance depth matrix. The ultimate land use may dictate the depth of clearance, but if an anomaly is at a greater depth than the clearance criteria, then the anomaly must be further investigated or recorded as an uninvestigated anomaly resulting in land use and/or other controls.

Response: The Government's contractor used MIL-STD-1916 for quality control sampling inspection. Government quality assurance is defined within the MIL-STD as the various functions, including inspection, performed by the Government to determine whether a contractor has fulfilled the contract obligations pertaining to quality and quantity. The Government's role is not to repeat the same processes and products to verify compliance with contract specifications. In the QASP provided to ADEM, the Government has described the means of Government QA for this site.

A clearance to depth includes the surface and subsurface clearance of OE items to a depth corresponding to the maximum depth of OE encountered in each sector. Investigation of an anomaly will continue until the source of the anomaly is found, or until it is determined that no OE item is present. For removal actions using digital geophysical mapping techniques, the failure criterion is defined as finding any ferrous object within the range of diameters of the smallest and largest items expected to be found to a depth of 11 diameters of the object.

4. **Page 2.3, Section 2.3.8.1, Task 10-Perform UXO/OE Clearance, Line 23:** The last sentence of Section 2.3.8.1 states: "Any anomalies located under paved roads will not be excavated." The Department disagrees with this statement. Anomalies should be investigated by the Army to verify the existence of MEC underneath paved roads. If MEC items are found or potentially identified then they should be removed accordingly.

Response: The anomalies under the pavement were investigated to the same level as other anomalies within the project area. The roads were mapped and no target size anomalies were detected. The Work Plan (WP) was revised to eliminate the statement that the anomalies located under paved roads will not be excavated. A slip sheet for the WP to incorporate this change is enclosed with this response.