

ONIS "TREY" GLENN, III
DIRECTOR

ADEM

Alabama Department of Environmental Management
adem.alabama.gov
1400 Coliseum Blvd. 36110-2059 • Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700
FAX (334) 271-7950

BOB RILEY
GOVERNOR

October 8, 2009

Mr. Scott Bolton
Site Manager
US Army Transition Force
P.O. Box 5022
Fort McClellan, Alabama 36205

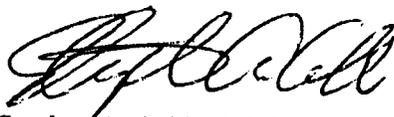
RE: ADEM Review and Concurrence: Draft First Five-Year Review Report for GSA Warehouse Area, Parcels 151(4), 2(4), 3(4), 4(4), 64(4), 69(4), 91(4), 111(4), 128(4), 129(4) and 238(4); dated April 13, 2009 Fort McClellan, Calhoun County, Alabama Facility I.D. No. AL4 210 020 562

Dear Mr. Bolton:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the Draft First Five-Year Review for GSA Warehouse Area. The purpose of this five-year review is to determine the protectiveness of the remedy at the site. Deed restrictions are in place to prohibit access to or use of groundwater and will only allow industrial reuse of the property due to low levels of contaminants in groundwater and soil contamination caused by lead-based paint. The Department submitted informal comments to the Army on June 17, 2009 via email. Attached are the Army's responses to ADEM's informal comments. The Department considers all comments to be resolved and agrees that the selected remedy (i.e., deed restrictions) is currently protective of human health and the environment.

If you have any questions or concerns regarding this matter, please contact Mrs. Brandi Little at 334-274-4226 or via email at blittle@adem.state.al.us.

Sincerely,



Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

SAC/TPS/BCL/mal

cc: Mr. Doyle Brittain/EPA Region 4
Mrs. Tracy P. Strickland/ADEM

Mr. Lee Coker/USA COE, Mobile District
Mr. Robin Scott/Calhoun County MDA

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

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



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

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

ATTACHMENT

ADEM Review Comments

Draft First Five-Year Review GSA Warehouse Area, Parcels 151(4), 2(4), 3(4), 4(4), 67(4), 69(4), 91(4), 111(4), 128(4), 129(4) and 238(4)

Specific Comments and Responses

1. Page ES-1, Paragraph 3 notes that Quit Claim Deed #12 documents a groundwater restriction due to low levels of pesticides. The Summary Form on ES-3 states that deed restrictions are based on contaminants in groundwater and lead-based paint in soil. Please add another sentence regarding the lead-based paint issue in the Executive Summary.

Response: Another sentence will be incorporated into the executive summary of the final report stating that because of low levels of contaminants in groundwater and soil contamination caused by lead-based paint, the U.S. Army placed deed restrictions on the GSA Warehouse property. Comment resolved.

2. Please include a figure of Fort McClellan with the GSA Warehouse Area shaded to help the reviewer gain perspective as to the site location.

Response: A site location figure will be incorporated into the final report showing FTMC Main Post with the location of the GSA Warehouse Area. Comment resolved.

3. Page 5-1, Paragraph 1 states that a public meeting was held on March 5 to respond to concerns from the public prior to the final submittal of this five-year report. Please clarify that this is the Draft report.

Response: Yes, this is the draft report. The public meeting was held on March 5 and the draft report was issued in April. The 30-day public comment period ran from April 30 through May 29, 2009, prior to submittal of the final report which will occur when regulator comments are addressed. No comments from the public were received. Comment resolved.

4. EPA Guidance on conducting five-year reviews states that after completion of the first five-year review, the trigger date for the next five-year review is the signature date of the previous report. Please clarify if the date in Section 10 should change to 2014.

Response: EPA guidance states "the review should be completed within 5 years of the trigger date". The Five-Year Review Summary Form indicates the trigger action date of October 8, 2003 and the actual review was conducted within the 5 year review period (September, 2008). Therefore, the next scheduled 5 year review should be completed by September 2013. Comment resolved.

5. EPA Guidance on conducting five-year reviews states that it is recommended that the public be notified that the five-year review will be conducted, notified that it is completed, and provided the results in a local repository. Please clarify if the Army plans on conducting any other community involvement activities besides the public meeting held in March.

Response: The Army notified the local residents that a public meeting would be held on March 5, 2009 from 5 to 7 p.m. at the Anniston City Meeting Center, Room B, 1615 Noble Street, Anniston, Alabama. The Notice of Public Meeting was placed in the Anniston Star Newspaper on Thursday, February 26 and again on Sunday, March 1 prior to the meeting. An administrative record related to the GSA Warehouse Area at Fort McClellan is available to the public for review at the website www.mcclellan.army.mil, at the Anniston Calhoun Public Library, and at the Houston Cole Library at Jacksonville State University. Additionally, the Army made a second public notification that the meeting was completed via the Anniston Star Newspaper. Please see below the 30-day public review period that was placed in the Anniston Star Newspaper on Wednesday April 29 and Sunday May 3, 2009.

NOTICE

The U.S. Army Corps of Engineers completed a five-year review for the GSA Warehouse Area at Fort McClellan, Alabama, a Base Realignment and Closure site. Because of the presence of low levels of organic chemicals in groundwater, and elevated lead levels in soil caused by lead-based paint, the U.S. Army placed land use controls in the form of deed restrictions on the property. The purpose of the five-year review is to determine if the land use controls continue to be protective of human health and the environment. Copies of the five-year review report are available to the public for review at www.mcclellan.army.mil, and are also on file at the Anniston Calhoun County Library on the 1st Floor, 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. Public comments on the five-year review report will be accepted until May 29, 2009. Written comments may be provided to Ms. Lisa Holstein at U.S. Army Transition Force, 291 Jimmy Parks Boulevard, Building 215, Fort McClellan, AL, 36205-5000 or e-mailed to lisa.holstein@us.army.mil.

Comment resolved.

**Responses to U.S. Environmental Protection Agency Comments on
Draft First Five-Year Review Report, GSA Warehouse Area, Parcels 151(4), 2(4), 3(4),
4(4), 67(4), 69(4), 91(4), 111(4), 128(4), 129(4), and 238(4),
Fort McClellan, Calhoun County, Alabama**

Comment from Doyle T. Brittain, Senior Remedial Project Manager, dated May 6, 2009.

Comment 1: **Failure to ensure the Land Use Controls were documented in Quit Claim Deed Number 12, filed on September 19, 2003, places an additional burden and responsibility on the Army to ensure compliance with the Land Use Controls. Note that transfer of property does not relieve the Army of compliance with Land Use Controls on that property.**

Response 1: Comment noted. The Army will ensure compliance with the LUCs.

**Responses to Fort McClellan Army Transition Force Comments on
Draft First Five-Year Review Report, GSA Warehouse Area, Parcels 151(4), 2(4), 3(4),
4(4), 67(4), 69(4), 91(4), 111(4), 128(4), 129(4), and 238(4),
Fort McClellan, Calhoun County, Alabama**

Comments from Mr. Bill Shanks dated April 20, 2009.

Comment 1: ES-1, Line 19-20: Change “two” to “three” and add “, 230” after “229”.
Rationale: Building 230 was included in the area deeded to A. W. Group,
LLC.

Response 1: The text will be revised per the comment.

Comment 2: Page 3-4, Line 3 & 5: Add “, 230” after “229” in line 3 and delete “230,”
in line 5. Rationale: Building 230 was included in the area deeded to A.
W. Group, LLC.

Response 2: The text will be revised per the comment.

Comment 3: Page 3-4, Table 2: Change the description to “Violin and Music
Supplier” and the owner or business to “Howard Core Company” for
Building Number 230 in Table 2.
Rationale: Building 230 was included in the area deeded to A. W. Group,
LLC and is used by Howard Core Company.

Response 3: The table will be revised per the comment.