RESPONSE TO COMMENTS

Response to Alabama Department of Environmental Management Comments
Draft Site Investigation Report, Range, Choccolocco Corridor, Parcel 143Q
(dated August 2003)
Fort McClellan, Calhoun County, Alabama

Comments from Stephen A. Cobb, Chief, Governmental Hazardous Waste Branch, Land Division, dated April 12, 2004.

Comment 1: **The Alabama Department of Environmental Management (ADEM or the Department) has completed its review of the above referenced document. The Department's Governmental Hazardous Waste Branch and Hydrogeology Unit have reviewed the referenced document. Based on the information presented in the draft SI report, it appears that activities conducted on this site have not adversely impacted the environment and that the site does not pose a threat to human or ecological health.**

The Department concurs with the Army's recommendation for no further action and unrestricted land reuse for this site.

Response 1: Comment noted.

Response to U.S. Environmental Protection Agency Comments
Draft Site Investigation Report, Range, Choccolocco Corridor, Parcel 143Q
Fort McClellan, Calhoun County, Alabama

Comments from Doyle T. Brittain, Senior Remedial Project Manager, dated September 11, 2003.

General Comment

Comment 1: **EPA agrees with the conclusions and recommendation of no further action for this Draft Site Investigation Report.**

Response 1: Comment noted.

Specific Comment

Comment 1: **<u>Appendix A</u>. The reason for using chain of custody forms is to allow the reconstruction of the custody of the samples from time of collection until time of receipt by the analytical laboratory. This is accomplished by signatures at the appropriate locations on the appropriate forms. The sampling records in this appendix will not allow for the reconstruction of the COC for the following reasons.**

- **On all of the sample collection logs (SCLs), the sampling team block contained printed names or initials, not signatures. Anyone can print someone else's name.**
- **The name of the person who signed the relinquished block on all of the chain of custody (COC) forms does not appear on the sample collection logs.**
- **On one of the COC forms, the received by block contains a printed name, not a signature.**

Response 1: Disagree. The main thrust of the reviewer's comment regards chain of custody yet the first bullet above addresses irregularities with the sample collection logs (SCL). Chain of custody is documented on the COC form as noted by the reviewer in the comment. While Shaw agrees that the SCLs should have been thoroughly completed as a matter of course, the irregularities therein do not invalidate the chain of custody because that is not their purpose.

With regard to the second bullet, Shaw followed the procedures outlined in Section 6.1.7.1 *Field Custody Procedures* presented in the *Draft Installation-Wide Sampling and Analysis Plan*, Revision 3, February 2002 (SAP). This section states, "The sampling team, sample coordinator, and site manager will maintain overall responsibility for the care and custody of the samples until they

are transferred or properly dispatched to the on-site screening facility and/or fixed-based laboratory." In addition, SAP Section 6.1.7.2 *Transfer of Custody and Shipment* states, "General custody of the sample will be maintained by the sample collection team members from the time of collection in the field through preparation and shipment to the laboratory. The main custody transfer will occur when the sample shipment is received into the laboratory from the field and is documented." Similar language is also provided in the QAP.

Using these two sections as guidance, all Shaw field personnel who are responsible for the collection of field samples (which includes the sample coordinator and the site manager) were considered part of the "sample team." No custody transfer record was considered necessary among members of the *same* sample collection team. If another contractor, a subcontractor to Shaw, the Army, or other personnel had collected samples and transferred them to Shaw for processing or analysis, then the transfer of custody of those samples would have been formally recorded using a COC form.

Multiple sample technicians were responsible for collecting samples and completing the sample collection logs. The samples and logs were funneled to the Shaw sample coordinator, who then reviewed the documentation, inventoried all of the samples collected, and compiled a single COC record to list all the samples collected (daily) for transfer to the receiving analytical laboratories. Therefore, the sample coordinator's signature on the form represents the transfer of custody from the Shaw sample team in the field to the analytical laboratory personnel (per Section 6.1.7.2 of the SAP). Shaw believes that this is satisfactory custody transfer documentation and, therefore, does not agree this indicates that sample custody was not maintained as stated in the comment. Shaw personnel followed the same chain-of-custody procedures that have been in effect since the beginning of the FTMC project in 1998. It is perplexing that until now these issues have never been called into question.

However, in light of recent comments received by ADEM and EPA, Shaw has changed its COC procedures to include a separate COC for each sample collection team. Each sample collection team will submit samples, COCs, and SCLs to the sample coordinator. The SCLs and COCs will be reviewed by the sample coordinator prior to taking possession of the samples and signing the COC. This process will be repeated for each sample collection team in the field. The COCs will then be copied for the field records and maintained onsite. The original forms will be transmitted to the office for filing in the project central files. In future reports, this appendix will include all "supplementary" sample team COCs to document intra-team custody transfers and all SCLs.

Regarding the last bullet: Is EPA implying that someone's "signature" can only be made through cursive writing? If an individual willingly marks a document and affirms that the mark is indeed his own, then the manner in which that mark is made and the form that mark takes are irrelevant.