

APPENDIX E
COMMENTS AND RESPONSES

Environmental Protection Agency Comments on the
Draft Site Investigation Report for Pelham Range Sites-Lima Pond, Old
Water Hole, and
Former Decontamination Area South of Toxic Gas Area

1. Something should be added to the title to indicate that the subject report deals only with a CWM investigation.

Response: The title will be changed to "Pelham Range Sites for Recovered Chemical Warfare Materiel (RCWM)..."

2. A short executive summary should be added which states that no CWM materials were detected in any of the media at these sites.

Response: An executive summary will be added.

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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REC'D AUG 16 '02 11:07

JAMES W. WARR
DIRECTOR

August 9, 2002

Ronald M. Levy
BRAC Environmental Coordinator
Environmental Office, 291 Jimmy Parks Blvd
US Army Garrison
Fort McClellan, Alabama 36205

RE: ADEM Review and Concurrence: *Draft Site Investigation Report for Pelham Range Sites for Chemical Warfare Materiel (CWM): Lima Pond, Old Water Hole, and Former Decontamination Area South of Toxic Gas Area*

Dated May 2002

Fort McClellan, Calhoun County, Alabama

Facility ID. No. AL8 213 700 000

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the above referenced document. Draft findings related to the subject document were discussed at the Base Realignment and Closure Team (BCT) meeting on May 21-22, 2001. During the meeting, the Department provided its comments on the site in an interactive manner such that the Army and BCT stakeholders could jointly resolve the Department's comments.

The Department agrees with Fort McClellan's investigation results in the *Site Investigation (SI) Report for Lima Pond, the Old Water Hole, and the Former Decontamination Area south of the Toxic Gas Area*. However, the Department requests that the Army add an acronym list to the report and also add "Chemical Warfare Materiel" to the title of this SI report as shown above in the suggested title.

Based on the data presented, Fort McClellan believes that exposure to environmental media related to CWM at Lima Pond, the Old Water Hole, and the Former Decontamination Area south of the Toxic Gas Area poses no potential threat to human health and the environment. ADEM concurs with Fort McClellan's findings that the above referenced sites be designated as NFA with respect to CWM. Hazardous, toxic, and radiological waste (HTRW) concerns will be addressed separately and are not addressed in the subject report.

ADEM has recently obtained the services of an ordnance and explosives/unexploded ordnance (OE/UXO) contractor to provide OE/UXO services to the Department. ADEM will provide comments concerning OE/UXO related issues, under separate cover, after the contractor has had an opportunity to review OE/UXO related activities at this site.

Mr. Ronald M. Levy

August 5, 2002

Page 2

For any questions concerning this matter, please contact Mr. Philip Stroud at 334-270-5646 or via email at pns@adem.state.al.us.

Sincerely,



Stephen A. Cobb, Chief
Hazardous Waste Branch
Land Division

SAC/pns/:L:Gov Fac Sec/Fort McClellan/Draft Site Investigation Report for Pelham Range Sites of CWM for Lima Pond, Old Water Hole, Former Decon Area S. of TGA.doc

cc: Mr. Jim Grassiano/ADEM
Mr. Philip Stroud/ADEM
Mr. Dan Copeland/USA COE, Huntsville
Mr. Lee Coker/USA COE, Mobile District

File: Land Division/DSMOA/HW/Fort McClellan/Correspondence, 2002

Responses to Comments in the Letter from the Alabama Department of Environmental Management by Stephen A. Cobb, dated August 5, 2002.

The comments are summarized below along with responses to the comments:

Comment 1. The Department requests that an acronym list be added to the report.

Response: An acronym list will be added to the report.

Comment 2. The words “Chemical Warfare Materiel” should be added to the title of the SI Report.

Response: The report title will be changed to “Final Site Investigation Report for Pelham Range Sites for Recovered Chemical Warfare Materiel (RCWM), Lima Pond, Old Water Hole, and Former Decontamination Area South of Toxic Gas Area.” This title was chosen in response to several comments.

Name: Karen Pinson
Date: 24 Jun 02

**Comment Response Matrix for the Draft May 2002 SI Report Pelham Range Sites (CWM)
BRAC 95 - Disposal and Reuse of Fort McClellan, Alabama**

Who	Page	Line	Comment and Rationale	Response to Comment
KBP	1-1	1.2.1	In sentence beginning on 8 th line, add as follows: In addition ... degradation products, Parsons collected sediment and surface water samples from Lima Pond ... Rationale: To clarify that Parsons collected the samples.	The collection of samples by Parsons will be clarified. [see response to comment about paragraphs 1.1.2 and 1.2.1 above.]
KBP	2-3	Para 2.3.3.1	Has the information in the last sentence been verified? Should the sentence be deleted? The clay lining could hold the water until it evaporates rather than allowing slow drainage. Pelham is known to have some areas where there is a type of clay that generally holds water well.	The sentence is speculation and will be deleted.
KBP	2-3	Para 2.3.4.2	Need to spell out HTRW or change it to HTW. Rationale: In the last sentence, "HTRW" is used but is not previously defined. On page 1-1, "HTW" is defined.	The text will be changed to HTW for consistency.
KBP	2-5	Para 2.4.2.3	Suggest stating the investigation where this information was obtained. If it was in the RI/BRA mentioned in paragraph 2.4.2.2, then the information in paragraph 2.4.2.3 should be included with paragraph 2.4.2.2.	Both paragraphs discuss information from the RI/BRA. Clarification will be provided regarding the source of information.
KBP	Fig 2.1		Need to move the legend to the right. Rationale: The hole punch goes through part of it.	The legend will be moved.
KBP	3-3	3.2.1.2	Should this section state what the NOSE distance was? Rationale: The similar sections for the Old Water Hole and Former Decon Area state the NOSE distance.	The NOSE distances will be added for all three sites.
KBP	Fig 3.3		Do you want to have the legend identify the SAIC geophysical anomaly? Rationale: On Figure 3.1 for Lima Pond the SAIC geophysical positions are noted by a grid pattern.	The symbol used in Figure 3.3 will be changed to match Figure 3.1.
KBP				

Name: Bill Shanks (BRS, Paul James (PEJ), and Karen Pinson (KBP) Date: 16 June 2002	Comment Response Matrix for the Draft Site Investigation Report for Pelham Range Sites Lima Pond, Old Water Hole and Former Decontamination Area South of Toxic Gas Area
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Who	Page	Line	Comment and Rationale	Response to Comment
PEJ	3-11		In Figure 3.4 it would be helpful to have a footnote in the legend to direct the reader to the paragraph in the text which discusses the anomalies shown. Rationale: Clarity.	A note will be added to Figure 3.4 stating that a discussion of the anomalies can be found in Section 4.4.4.
PEJ	3-13		In Figure 3.6 it would be helpful to the reader to know within the text, where soil borings and FDA's are addressed. Rationale: Clarity	A note will be added to Figure 3.6 stating that soil sampling results are discussed in Section 4.3.2 and that anomaly investigation results are discussed in Section 4.4.4.
BRS	4-2	Line 4, Para. 4.2.2	Insert "to" between "forwarding" and "SBCCOM". Rationale: The word needs to be added to make the sentence complete.	The sentence will be revised as requested.
BRS	4-3	Line 2, Para. 4.3.1.1	Change "Old Water Hole" to "Former Decon Area". Rationale: The area for which PID monitoring information is being provided in this paragraph is the Former Decon Area.	The text will be corrected to read Former Decon Area.
PEJ	4-5	Table 4.1	Is there a simple way to correlate the sample numbers in this table with the Figures in Section 3 and the sample numbers in Appendix A. Rationale: I believe it could lead a better understanding of the document at first look, rather than having to "leaf" back and forth	Cross references will be added to the figures and text to simplify finding the results.
BRS	A-1	Line 1, Introduction Para.	Verify that 37 is the correct number of environmental soil samples. Rationale: Information in Section 4 of the report indicates that 36 soil samples were collected and that is the number shown in Table 4.1. It appears that sample FD-SB03-1-2' is included twice in the Clearance Reports from SBCCOM.	The number will be changed to 36 samples.
BRS		Appendix C	Add the page number on the last page of Appendix C. Rationale: Page numbers have been shown on all the pages in Appendix C except for the last page.	The page number will be added.

