

## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR

DIRECTOR

November 28, 2001

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

DON SIEGELMAN  
GOVERNOR

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**RE: ADEM Review and Concurrence: Final Site Investigation Report and Decision Document for the Contractor Laydown Area and Former Tar Plant-Parcels 86(7), 99(7), and 32(7), dated August 2001, Fort McClellan, Calhoun County, Alabama Facility I.D. No. AL4 210 020 562**

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed both the *Final Site Investigation Report and Decision Document for the Contractor Laydown Area and Former Tar Plant, Parcels 86(7), 99(7), and 32(7)*, both dated August 2001 for Fort McClellan.

The subject documents were discussed during the Base Realignment and Closure Team (BCT) on-board review meeting on May 10, 2001. During the BCT on-board review meeting, the Department provided its comments on both documents in an interactive manner such that the Army and BCT stakeholders could jointly resolve the Department's comments. The Department's comments are noted in the documented minutes of this meeting.

An overview of the discussion that took place during the May on-board-review meeting is presented below. The following is a paraphrased narrative of the meeting minutes issued by IT Corporation on May 10, 2001:

***Contractor Laydown Area and Former Tar Plant: Parcels 86(7), 99(7), and 32(7)***- This site was used as a contractor staging area, and at one time had an asphalt batch plant. During validation of the QST Inc. data for this site, IT Corporation (IT) rejected 40-50 percent of the semivolatile organic compound (SVOC) soil samples. The rejected data appear to have resulted from a bad quality assurance quality control (QAQC) batch at the laboratory. The rejected data were widely scattered at the site. The remaining SVOC soil data were also widely scattered at the site, but were acceptable from a data validation standpoint. Although the site is projected for recreational and industrial reuse, the soil and groundwater data were screened against residential human health site-specific screening levels (SSSLs) to evaluate the site for possible unrestricted future use. In soils, with the exception of iron in one sample, the metals that exceeded residential human health SSSLs were below their respective background concentrations or were present at levels generally within the range of background values and thus do not pose an unacceptable risk to future human receptors (Science Application International Corporation (SAIC), July 1998, ***Final Background Metals Survey Report, Fort McClellan, Alabama***).



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*Several polynuclear aromatic hydrocarbon (PAH) compounds were detected in surface soils at concentrations exceeding SSSLs and PAH background values (IT Corporation (IT), March 2000, **Final Human Health and Ecological Screening Values and PAH Background Summary Report, Fort McClellan, Calhoun County, Alabama**). However, the presence of PAH compounds was probably the result of general anthropogenic conditions at the Contractor Laydown Area and Former Tar Plant. Sampling evidence did not indicate any specific contamination that could be attributed to the former asphalt batch plant. Much of the site is covered by asphalt and the site soil sampling results are indicative of conditions found at or near an asphalt roadbed. In addition, a railroad spur runs through the site, though no contamination is specifically attributed to railroad operations.*

*In groundwater, several metals were detected in seven samples at concentrations exceeding SSSLs and background concentrations. However, these groundwater samples exhibited high turbidity at the time of sample collection and it is believed that this turbidity caused the elevated metals concentrations. The high turbidity is believed to be the cause of the elevated metals levels, based on results of follow-up confirmation sampling specifically conducted to prove this point. Evaluation of six low-turbidity groundwater samples collected at the site indicated that metals have not adversely impacted groundwater and all follow-up samples yielded metal results that were below SSSLs and/or that were within the range of background values.*

*The data show low levels of aldrin. The BCT discussed the EPA drinking water standard and health advisory level for aldrin (there is no maximum contaminant level (MCL) for aldrin) relative to the levels determined at this site. Since the site concentrations of aldrin are an order of magnitude lower than the EPA health advisory levels, the BCT agreed that the potential impact to human and ecological receptors is expected to be minimal.*

*Three metals (beryllium, mercury, and nickel) were detected in a limited number of surface soil and sediment samples at concentrations exceeding ecological screening values (ESVs) and the range of background values. In addition, PAHs, VOCs, pesticides, and one polychlorinated biphenyl (PCB) compound exceeded ESVs in site media. However, the potential threat to ecological receptors is expected to be low based on site conditions (IT Corporation (IT), March 2000, **Final Human Health and Ecological Screening Values and PAH Background Summary Report, Fort McClellan, Calhoun County, Alabama**). The site, which is located within the developed area of the Main Post, is mostly covered by asphalt and is surrounded by roads and buildings. The site does not support substantial ecological habitat.*

As discussed in the meeting and as presented in the Final Site Investigation Report and accompanying Decision Document, it appears that this parcel does not pose a substantial risk to potential human and ecological receptors. The Department understands that this Decision Document is an Army-lead document under the signatory approval of the Army. However, the Department concurs with the BCT's recommendation that this site warrants no further action and an unrestricted use designation.

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For any questions or concerns regarding this matter please contact Mr. Philip Stroud at 334-270-5646 or via email at [pns@adem.state.al.us](mailto:pns@adem.state.al.us).

Sincerely,



Stephen A. Cobb, Chief  
Hazardous Waste Branch  
Land Division

SAC/ps

cc: Mr. Doyle Brittain/EPA Region 4  
Mr. Ellis Pope/USA COE, Mobile District  
Mr. Jim Grassiano/ADEM  
Mr. Mark Harrison/ADEM

File: ADEM Land Division/Hazardous Waste Branch/Fort McClellan, Correspondence, 2001



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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August 30, 2001

EMAIL & HAND DELIVERY

4WD-FFB

Mr. Ron Levy  
BRAC Environmental Coordinator  
U.S. Army Garrison/Transition Force  
Environmental Office  
291 Jimmy Parks Boulevard  
Fort McClellan, AL 36205-5000

SUBJ: Final Site Investigation Report for the Contractor Laydown Area and Former Tar Plant,  
Parcels 86(7), 99(7), and 32(7)  
Final Decision Document for the Contractor Laydown Area and Former Tar Plant,  
Parcels 86(7), 99(7), and 32(7)  
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed the subject documents. Based upon the information provided to EPA and as agreed upon in the May 24-25, 2001, On Board Review Project Team Meeting, EPA agrees with and approves the subject documents. Thank you for your cooperation. If you have any questions, please call me at (404) 562-8549.

Sincerely,

A handwritten signature in cursive script that reads "Doyle T. Brittain".

Doyle T. Brittain  
Senior Remedial Project Manager

cc: Lisa Kingsbury, Ft. McClellan  
Ellis Pope, USA, COE  
Phil Stroud, ADEM  
Jeanne Yacoub, IT  
Dan Copeland, USACE  
Maj. Bernie Case, ALANG  
Maj. Wayne Sartwell, ALANG