

**FINAL**

**FINDINGS OF SUITABILITY TO TRANSFER  
(FOST)**

**JPA E7 TRANSFER  
FORT MCCLELLAN, CALHOUN COUNTY, ALABAMA**

**DECEMBER 2000**

## TABLE OF CONTENTS

1.0	PURPOSE .....	1
2.0	PROPERTY DESCRIPTION .....	1
3.0	ENVIRONMENTAL CONDITION OF THE PROPERTY .....	3
3.1	Environmental Condition of Property Categories .....	3
3.2	Storage, Release, or Disposal of Hazardous Substances.....	5
3.3	Petroleum and Petroleum Products .....	5
3.3.1	Storage, Release, or Disposal of Petroleum Products .....	5
3.3.2	Underground and Above-Ground Storage Tanks (UST/AST).....	5
3.4	Polychlorinated Biphenyls (PCBs).....	5
3.5	Asbestos .....	6
3.6	Lead-Based Paint (LBP).....	6
3.7	Radiological Materials .....	6
3.8	Radon .....	7
3.9	Ordnance and Explosives.....	7
3.10	Other Hazardous Conditions .....	7
4.0	REMEDIATION .....	7
5.0	REGULATORY/PUBLIC COORDINATION .....	7
6.0	NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE AND CONSISTENCY WITH LOCAL REUSE PLAN .....	7
7.0	ENVIRONMENTAL PROTECTION PROVISIONS .....	8
8.0	FINDING OF SUITABILITY TO TRANSFER .....	8
9.0	REFERENCES .....	9

### **List of Tables**

1. Condition of Property
2. Community Environmental Response Facilitation Act Categories and Codes
3. Notification of Petroleum Product Storage, Release, and Disposal

### **List of Figures**

1. Fort McClellan: Main Post and Choccolocco Corridor
2. JPA E7 Area, Fort McClellan: Main Post and Choccolocco Corridor
3. Site Map, Building 350 Compound
4. Site Map, Building 3181

### **Attachments**

**Attachment 1** - Environmental Protection Provisions

**Attachment 2** - Asbestos Containing Material Report, Building 3181

**Attachment 3** - Response to Comments by ADEM and EPA

## LIST OF ACRONYMS

ACM	Asbestos Containing Material
ADEM	Alabama Department of Environmental Management
AST	Aboveground Storage Tank
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERFA	Community Environmental Response Facilitation Act
CFR	Code of Federal Regulations
DOD	Department of Defense
DRMO	Defense Reutilization and Marketing Office
EBS	Environmental Baseline Survey
EIS	Environmental Impact Statement
ECP	Environmental Condition of Property
EPA	Environmental Protection Agency
FMC	Fort McClellan
FOST	Finding of Suitability to Transfer
JPA	Joint Powers Authority
LBP	Lead-Based Paint
NEPA	National Environmental Policy Act
MDA	Minimum Detectable Activity
OE	Ordnance and Explosives
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
ppm	Parts Per Million
TSCA	Toxic Substances Control Act
UST	Underground Storage Tank
VCR	Video Cassette Recorder

**FINDING OF SUITABILITY TO TRANSFER  
(FOST)  
JPA E7 Transfer  
Fort McClellan, Calhoun County, Alabama  
December 2000**

**1.0 PURPOSE**

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of the JPA E7 property (herein referred to as the Property), U.S. Army Garrison Fort McClellan (FMC), Alabama, for transferring to the Anniston-Calhoun County Fort McClellan Development Joint Powers Authority (JPA). The proposed use of the Property is consistent with Fort McClellan Comprehensive Reuse Plan and the Comprehensive Environmental Responses, Compensation and Liability Act (CERCLA) §120(h), the Department of Defense (DOD) and Army policy. In addition, the FOST identifies use restrictions necessary to protect human health or the environment as specified in the attached Environmental Protection Provisions (Attachment 1).

**2.0 PROPERTY DESCRIPTION**

Fort McClellan is located in Calhoun County in the foothills of the Appalachian Mountains in northeast Alabama (Figure 1). The proposed property for transferring is located in the north central and west central portions of the Main Post of FMC (Figure 2). The JPA E7 property consists of Building 350 Compound and Building 3181. Building 350 Compound consists of the Consolidated Maintenance Facility; Buildings 349, 350, 351, and 352, associated facilities; Facilities 353, 354, 356 and 356W( UST), and the surrounding land measuring approximately 7.3 acres located south of 18th Street, east of 3rd Avenue and west of 2nd Avenue. A site map of Building 350 Compound is shown on Figure 3. Building 3181 is located east of 13th Avenue, south of Sumerall Gate Road, and north of 23rd Street (Figure 4). Facilities included in the JPA E7 property are summarized in Table 1.

**Building 350 Compound.** The facilities within the compound were constructed in 1991 and were used for maintenance purposes until December 1999. The main building, Building 350, consists of a small electronic repair shop, radio repair and installation shop, weapons cleaning and storage, supply room for new batteries and other equipment, vehicle training and maintenance area, and old smoke generator storage. The electronics repair shop was

mainly used to repair videocassette recorders (VCRs) and televisions. The radio shop repaired and installed radios used by the Army and Alabama National Guard. Small arms weapons were checked out from the weapon supply shop and, on return were broken down and cleaned with Safety Kleen<sup>7</sup>. The vehicle maintenance area was mainly used for organizational maintenance, engine changes, and air-conditioning repairs. One room in the building was used to store and repair smoke generators. Some maintenance was done on the M12 and M17 power driven steam cleaner decontamination units. A paint booth that was previously located at Building 338 was relocated to Building 350 and was used for storage. Building 350 is bermed with the maintenance floor sloped to an oil/water separator that discharges to the sanitary sewer. No releases have been documented at this building (EBS, 1998).

Building 349 housed a radiator repair shop, battery maintenance shop, a paint booth, and an all-wheel drive balancing station. The building drains to the gravity oil/water separator (Facility 354). At the radiator repair shop, radiator fluid was drained, and the radiators were cleaned with a caustic solution. At the Battery Maintenance Area, batteries were drained and either recharged for use or marked as wet batteries and sent to the Defense Reutilization and Marketing Office (DRMO) for disposal. Prior to maintenance, the floor drain was plugged to prevent a discharge to the oil/water separator. Vehicles were repainted in the paint booth after repair work was finished. Paint wastes were disposed of in a drum that was emptied every 3 to 6 months, depending on the amount of use. The waste was disposed of through the installation's Directorate of Environment. There are no documented releases at Building 349 (EBS, 1998).

Facility 351 is a steam-generated washrack, used to remove oil and grease from vehicles. The washrack contains a coalescing plate oil/water separator attached to a settling basin that discharges to the sanitary sewer system. Building 352 was used as a temperature-controlled storage area for paints and oils. All containers stored in the building were well marked. The building has a drain to the facility oil/water separator (Facility 354). There are no documented releases at Building 352, the building is currently empty. Facility 353 is a water/gravity separator adjacent to the oil/water separator.

One 10,000-gallon diesel Underground Storage Tank (UST) (Facility 356) installed in 1991 and one 2,500-gallon waste oil UST (Facility 356W) installed in 1995 were active until closure of the maintenance facility in December 1999. The diesel and waste oil USTs are located to the southwest and east of main Building 350, respectively. A fence surrounds the entire Building 350 Compound.

**Building 3181.** Building 3181 was constructed in 1954 and utilized as a Chemical School Instructional Facility until 1973. Since 1975 until installation closure in September 1999, Building 3181 was used as the Military Police School.

### **3.0 ENVIRONMENTAL CONDITION OF THE PROPERTY**

A determination of the environmental condition of the property was made by reviewing existing environmental documents, aerial photographs, and recorded chain of title documents, completing associated physical and visual inspection of the site and the properties immediately adjacent to Building 350 Compound; and conducting interviews with FTMC Real Estate Personnel. Documents reviewed included the Final Environmental Baseline Survey (EBS) and Community Environmental Response Facilitation Act (CERFA) Letter Report (January, 1998); U. S. Environmental Protection Agency (EPA) Region IV and the Alabama Department of Environmental Management's (ADEM) conditional concurrence to the CERFA Report; Asbestos Containing Material Survey Report (1998); Lead-Based Paint Assessment Report, 1995; Commodity Site Survey Report (March 2000); the Disposal and Reuse Environmental Impact Statement (August 1998) and its associated Record of Decision (June 1999); Final UST Summary Report (1999); Site Investigation Report, Former Fire Training Pit, EBS Parcels 77(7), 170(7), and 7(7) (April 2000); Decision Document for "No Further Action" at the Former Fire Training Pit, EBS Parcels 77(7), 170(7), and 7(7) (April 2000); and the Fort McClellan Archive Search Report, (1999).

#### **3.1 Environmental Condition of Property Categories**

DOD Environmental Condition of Property (ECP) Categories and codes are summarized in Table 2. Following are the ECP categories included in the JPA E7 property for transferring:

**ECP Category 1:** Buildings 349, 350, and 352, Consolidated Maintenance Facility, EBS Parcel 76(1)  
Building 3181, General Installation Building, EBS Parcel 161(1)

**ECP Category 3:** Building 350, Former Fire Training Pit, EBS Parcels 77(3)  
Building 351, Washrack, Parcel EBS 170(3)  
Facilities 356 and 356W, Diesel UST and Waste Oil UST, respectively, EBS Parcel 7(3)

Buildings 349, 350, and 352, Consolidated Maintenance Buildings, EBS Parcel 76(1), were previously classified as Category 2 property. DOD revised the environmental condition of property categories so that property may be classified as Category 1, if there was storage of hazardous substances, but no release or disposal of the materials. Based on review of existing records, there is no documentation of any release or disposal of hazardous substances at the three buildings and they are therefore reclassified as Category 1 property.

One 10,000-gallon diesel tank (Facility 356) and one 2,500-gallon waste oil tank (Facility 356W), EBS Parcel 7(3), have met all ADEM requirements and satisfied tank tightness tests within the last 5 years.

The Former Fire Training Pit, EBS Parcel 77(3), was located where Building 350, Consolidated Maintenance Facility is built. Dates of operation of the pit are unknown; however, use of the pit was discontinued prior to 1986. The entire area (pad and soil) was excavated when Building 350 was constructed in 1991.

The Washrack, Facility 351, EBS Parcel 170(3), built in 1991, is a steam-generated washrack used to remove oil and grease from vehicles.

A site investigation was conducted for the Former Fire Training Pit, washrack and the USTs. Investigation results indicated that there are no chemicals associated with the sites that present an unacceptable risk to either human health or the environment. A “No Further Action” was recommended for the Former Fire Training Pit, washrack and the UST sites (IT, 2000a). The Final Decision Document for the former Fire Training Pit (EBS Parcels 77(3), 7(3), and 170 (3) was signed on 29 November 2000. A copy of the site investigation report will be provided to the JPA.

Based on site investigation results, chemical constituents detected in site media are at concentrations that do not require a removal or remedial action. Therefore, the Property is reclassified to Category 3; an area where release, disposal, and or migration of hazardous substance has occurred, but at concentrations that do not require a removal or remedial response.

Adjacent properties to the Building 350 Compound include the DRMO, EBS Parcel 85(7), to the east and northeast, and the Former Ordnance Motor Repair Area and adjacent warehouses, EBS Parcel 75(7), to the south and west. The Former Motor Pool Area 600,

EBS Parcel 149(7), is located to the north and EBS Parcel, 161(1) lies to the north, northwest and southeast of the Compound.

Adjacent properties to Building 3181 include the Boiler Plant No.1, EBS Parcel 89(7) to the northeast, the Reported Chemical Warfare Materiel site, EBS Parcel 192(7), to the northwest, the Printing Plant Building 3183, EBS Parcel 162(7) and the Old Toxic Training Area, EBS Parcel 188(7) to the southwest.

Site investigations are currently ongoing for the Category 7 sites adjacent to the Property to determine the presence or absence of contamination.

### **3.2 Storage, Release, or Disposal of Hazardous Substances**

Based on a review of existing records and available information, there is no evidence that hazardous substances were stored for 1 year or more, released, or disposed on the property in excess of the reportable quantities listed in 40 Code of Federal Regulations (CFR), Parts 373 and 302.4. Accordingly, there is no need for any notification of hazardous substance storage, release, or disposal.

### **3.3 Petroleum and Petroleum Products**

#### **3.3.1 Storage, Release, or Disposal of Petroleum Products**

Petroleum products were stored in two USTs at Facilities 356 and 356W, EBS Parcel 7(3) on the Property. There is no record of petroleum releases at the two tanks.

#### **3.3.2 Underground and Above-Ground Storage Tanks (UST/AST)**

Two USTs are present within the Building 350 Compound that were used for storage of petroleum products. One 10,000-gallon diesel tank (Facility 356) and one 2,500-gallon waste oil tank (Facility 356W) are located to the southwest and east of the Main Building 350, respectively. The 10,000-gallon diesel UST was installed in 1991 and the 2,500-gallon waste oil UST was installed in 1995. The tanks were both active until closure of the maintenance facility in December 1999. The two tanks have met all ADEM requirements and satisfied tank tightness tests within the last 5 years. A site investigation was conducted for the two USTs. Results indicated that there are no chemicals associated with the tanks that present an unacceptable risk to either human health or the environment. A summary of the petroleum product activities is provided in Table 3.

### **3.4 Polychlorinated Biphenyls (PCBs)**

Based on a review of existing records and available information, there are no PCB contaminated transformers located on the Property and no evidence of releases from PCB equipment. Some fluorescent light ballasts in the buildings may contain PCB in excess of 50 parts per million (ppm), which are subject to the Toxic Substances Control Act (TSCA) requirements. The deed will contain the fluorescent light ballasts PCB warning and covenant provided in the Environmental Protection Provisions (Attachment 1).

### **3.5 Asbestos**

Based on the 1998 Asbestos Containing Material (ACM) Survey Report (1998), Building 3181 contains friable and non-friable asbestos. Friable ACM includes white chalky asbestos containing insulation compound applied to 8-inch and 12-inch pipes throughout the first floor and in some cases the crawlspace of the building, white air-cell type asbestos containing pipe insulation found on runs of 6-inch, 8-inch, and 12-inch piping throughout the building, and white asbestos containing pipe fitting insulation applied to various pipes in the building. Non-friable asbestos containing mastics and 12 by 12 and 9 by 9-inch vinyl floor tiles are found throughout the building (Attachment 2). The deed will contain the asbestos warning and covenant provided in the Environmental Protection Provisions (Attachment 1).

### **3.6 Lead-Based Paint (LBP)**

Building 3181 was constructed in 1954. Based on the age of the building (constructed prior to 1978), it is presumed to contain lead-based paint. The interior and exterior of Building 3181 were repainted in 1991 and 1994, respectively, the paint is in good condition. The deed will contain the lead-based paint warning and covenant provided in the Environmental Protection Provisions (Attachment 1).

### **3.7 Radiological Materials**

Building 350 contains two bays (rooms 16-D and 18-B) that were used for maintenance of military vehicles containing radium dials. A radiological survey was conducted in the two bays that had radiological activities and the survey results indicated that all readings were at or below background or minimum detectable activity (MDA) levels. The survey concluded that all areas are suitable for unrestricted use (Allied Tech. Group, 2000).

Building 3181 housed an isotope laboratory in Room 35 and Scaler Laboratory T in Room 36. The facility operated from the 1950s to 1973. Room 36 was reportedly used for teaching and not for storage of radiological sources. Sources were brought into the room immediately prior to class and removed immediately after class. Room 35 was used to prepare unsealed sources under a fume hood with a vent fan and “absolute” filter. Materials reportedly used in

Room 35 included SR/Y-90 M6 source sets; plutonium alpha particle sources; Cobalt-60, and Cesium-137. The Military Police School last used Room 35 as a computer room. Prior to being used as the computer room, the area was cleaned to acceptable levels. During installation closure, a radiological survey was conducted for unrestricted release for rooms 35 and 36. All surveys were at or below background or MDA levels. A copy of the survey report will be given to the JPA.

### **3.8 Radon**

Radon surveys were not conducted for Buildings located on the Property. The buildings do not contain basements.

### **3.9 Ordnance and Explosives**

Based on a review of existing records and available information, the Property and the surrounding land is not known or suspected to contain ordnance and explosives. However, since FMC is a former military installation with a history of OE use, there is a potential for OE to be present on the Property. The deed will contain the OE notice provided in the Environmental Protection Provisions (Attachment 1).

### **3.10 Other Hazardous Conditions**

Based on a review of existing records and available information, there are no other hazardous conditions that present an unacceptable threat to human health or the environment on the property.

## **4.0 REMEDIATION**

There are no environmental remediation orders or agreements applicable to the property. However, in the event that remedial action is found to be necessary that has not been taken on the date of the transfer, the U.S. Army will conduct the appropriate remedial action. The transfer will contain a provision reserving the U.S. Army's right to conduct remediation activities as provided in the Environmental Protection Provisions (Attachment 1).

## **5.0 REGULATORY/PUBLIC COORDINATION**

The U.S. EPA Region IV, the ADEM, and the public were notified of the initiation of the FOST. There are no unresolved comments, and all comments received were reviewed and incorporated as appropriate. ADEM and EPA comments received during the FOST development are provided as Attachment 3.

## **6.0 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE AND CONSISTENCY WITH LOCAL REUSE PLAN**

The environmental impacts associated with the proposed transfer of the property have been analyzed in accordance with the National Environmental Policy Act (NEPA). The results of this analysis have been documented in the Disposal and Reuse Environmental Impact Statement (EIS) (1998). Any encumbrances or conditions identified by the analysis as being necessary to protect human health or the environment have been incorporated into the FOST. In addition, the proposed transfer is consistent with the intended reuse of the property as set forth in the Comprehensive Reuse Plan adopted by the JPA.

## **7.0 ENVIRONMENTAL PROTECTION PROVISIONS**

In consideration of the results from the EBS, other environmental studies, and the intended use of the Property, certain terms and conditions are required for the proposed transfer. These terms and conditions are set forth in the attached Environmental Protection Provisions (Attachment 1) and will be included in the deed.

## **8.0 FINDING OF SUITABILITY TO TRANSFER**

Based on the above information, I conclude that all DOD requirements to reach a finding of suitability to transfer the Property to the JPA have been met subject to the terms and conditions in the attached Environmental Protection Provision (Attachment 1). In addition, the deed for this transaction will contain the following provisions:

- The covenant under CERCLA §120(h)(3)(A)(ii)(II) warranting that any remedial action under CERCLA found to be necessary after the date of transfer with respect to such hazardous substances remaining on the Property shall be conducted by the United States.
- The clause as required by CERCLA §120(h)(3)(A)(iii) granting the United States access to the Property in any case in which remedial action or corrective action is found to be necessary after the date of transfer.

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Philip E. Sakowitz, Jr.  
Deputy Chief of Staff for Base Operations Support  
Headquarters United States Army Training and Doctrine Command

## 9.0 REFERENCES

Allied Technology Group, 2000, *Commodity Site Survey Report, Fort McClellan, Calhoun County, Alabama*, March.

Environmental Science and Engineering, Inc. (ESE), 1998, *Final Environmental Baseline Survey, Fort McClellan, Alabama*, prepared for U.S. Army Environmental Center, Aberdeen Proving Ground, Maryland, January.

Fort McClellan (FTMC), 1997, *Fort McClellan Comprehensive Reuse Plan*, Fort McClellan Reuse and Redevelopment Authority of Alabama, prepared under contract to the Calhoun County Commission, November.

IT Corporation (IT), 2000a, *Site Investigation Report, Former Fire Training Pit, Parcels 77(7), 170(7), and 7(7), Fort McClellan, Alabama*, April.

IT Corporation (IT), 2000b, *Decision Document for No Further Action at the Former Fire Training Pit, Parcels 77(7), 170(7), and 7(7), Fort McClellan, Alabama*, April.

IT Corporation (IT), 1999, *Final UST Summary Report, Fort McClellan, Calhoun County, Alabama*, April.

John Calvert Environmental, Inc., 1995, *Lead-Based Paint Risk Assessment Report for Fort McClellan, Alabama*, July.

Riesz Engineering, 1998, *Asbestos Containing Material Survey Report, Fort McClellan, Calhoun County, Alabama*.

U.S. Army Corps of Engineers (USACE), 1999, *Archives Search Report, Maps, Fort McClellan, Anniston, Alabama*, July.

U.S. Army Corps of Engineers (USACE), Mobile District, 1998, *Final Environmental Impact Statement, Disposal and Reuse of Fort McClellan Alabama*, August.

U.S. Army Office of the Assistant Secretary Installation, 1999, *Final Record of Decision, Fort McClellan Alabama*, June.

## **TABLES**

1. Condition of Property
2. Community Environmental Response Facilitation Act Categories and Codes
3. Notification of Petroleum Product Storage, Release, and Disposal

**Table 1**  
**Condition of Property**  
**Building 350 Compound and Building 3181**  
**JPA E7 Transfer**  
**Fort McClellan, Alabama**

Bldg. No.	Year Built	Area (sq.ft)	Design Use Description	CERFA Category	CERFA Parcel Label	Non-CERCLA Parcel Number	Non-CERCLA Issues					Remarks/Remedial Action
							A	L	R	P	X	
349	1991	7,200	MAINTENANCE GENERAL PURPOSE	1	76(1)							Bldg. 349 houses a radiator repair shop, battery maintenance shop, a paint booth, and an all-wheel drive balancing station. There are no documented releases at this building.
350	1991	87,832	MAINTENANCE GENERAL PURPOSE	1 3	76(1) 77(3)PR/HR(P)							Located in Bldg. 350 is a small electronic repair shop, radio repair and installation shop, weapons cleaning and storage, supply room for new batteries and other equipment, vehicle training area and maintenance area, and old smoke generator storage. No releases have been documented at this building.  A Former Fire Training pit was located where Building 350 is constructed. The entire pit was excavated and soil was removed during construction of Building 350. A site investigation was conducted for the site. Investigation results indicate that there are no chemicals associated with the site that present an unacceptable risk to either human health or the environment. No further action is recommended for the site.
351	1991		WASH PLATFORM ORGANIZATION	1 3	76(1) 170(3)							A site investigation was conducted for the Washrack. Investigation results indicate that there are no chemicals associated with the washrack that present an unacceptable risk to either human health or the environment. No further action is recommended for the site.
352	1991	1,200	MAINTENANCE GENERAL PURPOSE	1	76(1)							Building 352 is a temperature-controlled storage area for paints and oils, and all containers are well marked. There are no documented releases at this building.
353	1991		WATER/GRAVITY SEPARATOR	1	76(1)							
354	1991		GRAVITY OIL/GREASE SEPARATOR	1	76(1)							
356	1991		BULK OIL UST	3	7(3)							One 10,000-gallon diesel UST was installed in 1991 and has met ADEM requirements and all tank tightness tests in the last five years.
356W	1995		WASTE OIL UST	3	7(3)							One 2,500-gallon waste oil UST has met all ADEM requirements and all tank tightness tests in the last five years.  A site investigation was conducted for the two tanks. Investigation results indicate that there are no chemicals associated with the tanks that present an unacceptable risk to either human health or the environment. No further action is recommended for the tanks.

**Table 1**  
**Condition of Property**  
**Building 350 Compound and Building 3181**  
**JPA E7 Transfer**  
**Fort McClellan, Alabama**

Bldg. No.	Year Built	Area (sq.ft)	Design Use Description	CERFA Category	CERFA Parcel Label	Non-CERCLA Parcel Number	Non-CERCLA Issues					Remarks/Remedial Action
							A	L	R	P	X	
3181	1954	119,990	GENERAL INSTALLATION BUILDING	1	161(1)	14Q-A/L(P)	X	X				In 2000, a radiological survey was conducted for unrestricted release for rooms 35 and 36 including the ventilation duct. All surveys were at or below background or MDA levels.

- A – Asbestos
- L – Lead-based Paint
- R – Radon
- P – PCB
- X - Ordnance and explosives

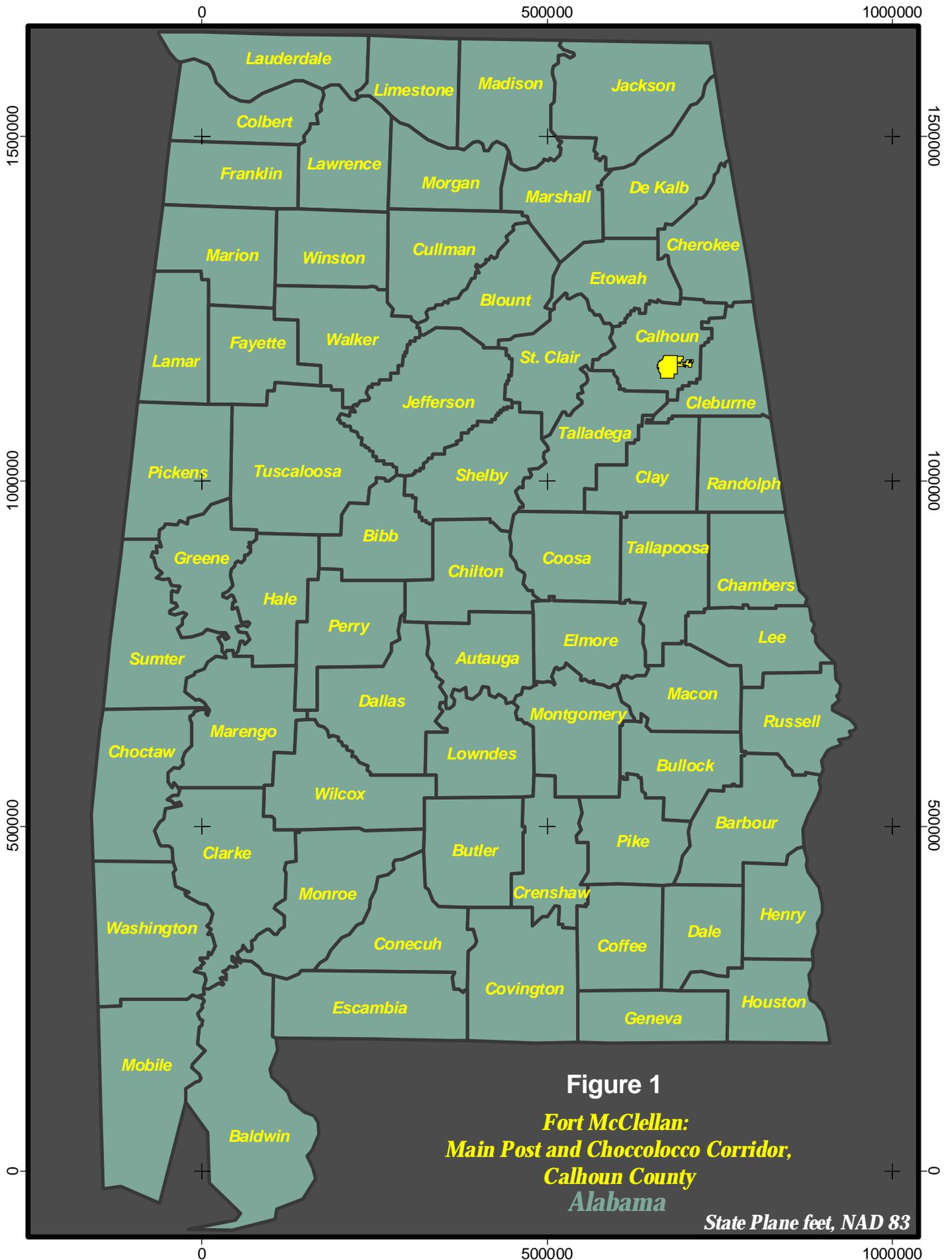
**Table 2**  
**Community Environmental Response Facilitation Act Categories and Codes**  
**Environmental Condition of Property**  
**Fort McClellan, Calhoun County, Alabama**

Category	Description
Category 1	Areas where no storage, release, or disposal of a hazardous substance or petroleum products has occurred (including no migration of these substances from adjacent areas)
Category 2	Areas where only release or disposal of petroleum products has occurred
Category 3	Areas where release, disposal, and or migration of a hazardous substance has occurred, but at concentrations that do not require a removal or remedial response
Category 4	Areas where release, disposal, and or migration of a hazardous substance has occurred, and all removal or remedial actions to protect human health and the environment have been taken
Category 5	Areas where release, disposal, and or migration of a hazardous substance has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken
Category 6	Areas where release, disposal, and or migration of a hazardous substance has occurred, but required actions have not yet been implemented
Category 7	Areas that are not evaluated or require additional evaluation
<b>CERCLA Codes for Categories 2 through 7</b>	
HS	indicates hazardous substance storage
HR	indicates hazardous substance release and/or storage
PR	indicates petroleum substance release and/or storage
PS	indicates petroleum substance storage
(P)	indicates possible release or disposal, unverified by sampling or analysis



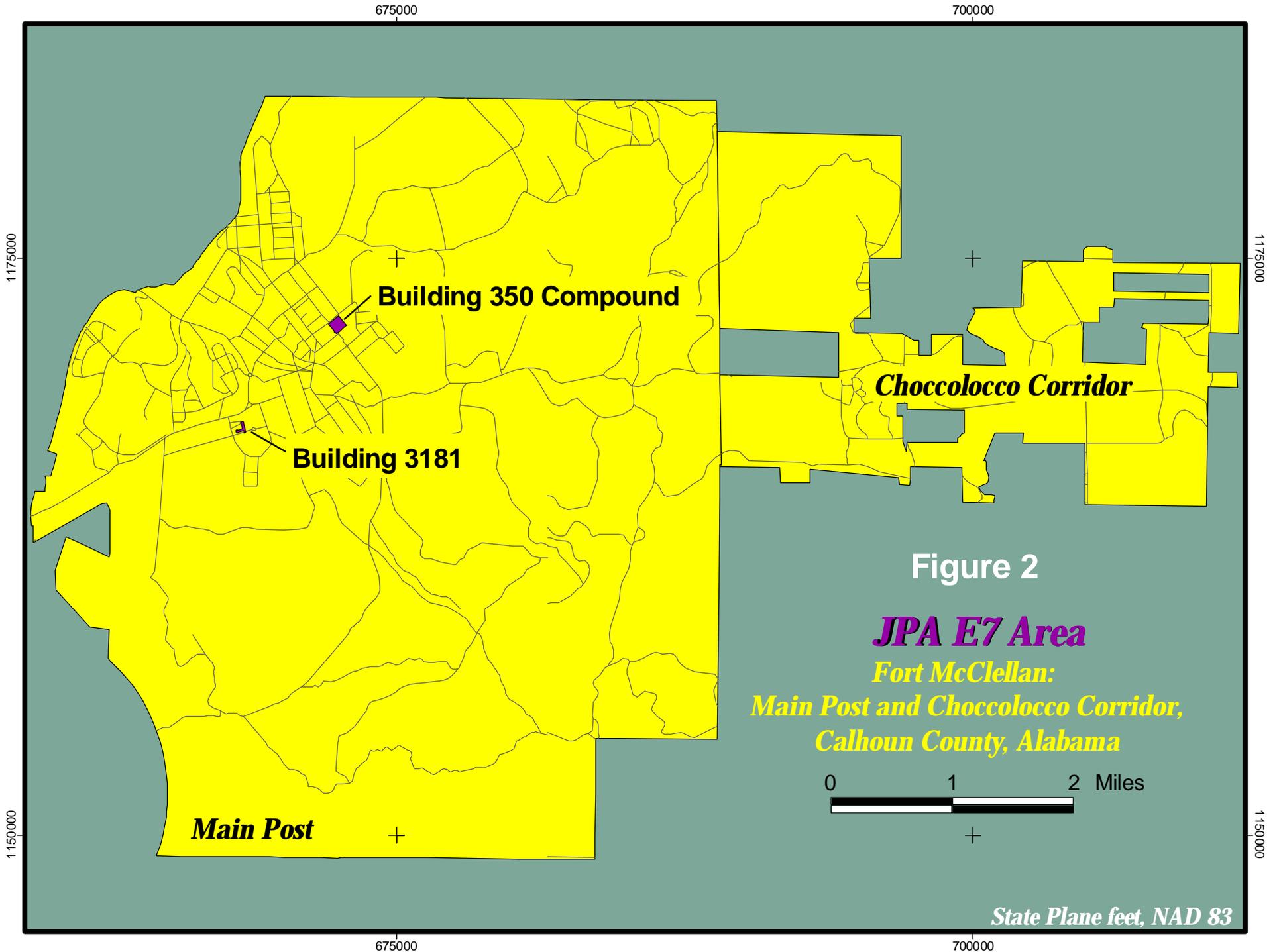
## **FIGURES**

1. Fort McClellan: Main Post and Choccolocco Corridor
2. JPA E7 Area, Fort McClellan: Main Post and Choccolocco Corridor
3. Site Map, Building 350 Compound
4. Site Map, Building 3181



**Figure 1**  
**Fort McClellan:**  
**Main Post and Choccolocco Corridor,**  
**Calhoun County**  
**Alabama**

State Plane feet, NAD 83



675000

700000

1175000

1175000

**Building 350 Compound**

**Building 3181**

**Choccolocco Corridor**

**Main Post**

**Figure 2**

**JPA E7 Area**

**Fort McClellan:  
Main Post and Choccolocco Corridor,  
Calhoun County, Alabama**

0 1 2 Miles

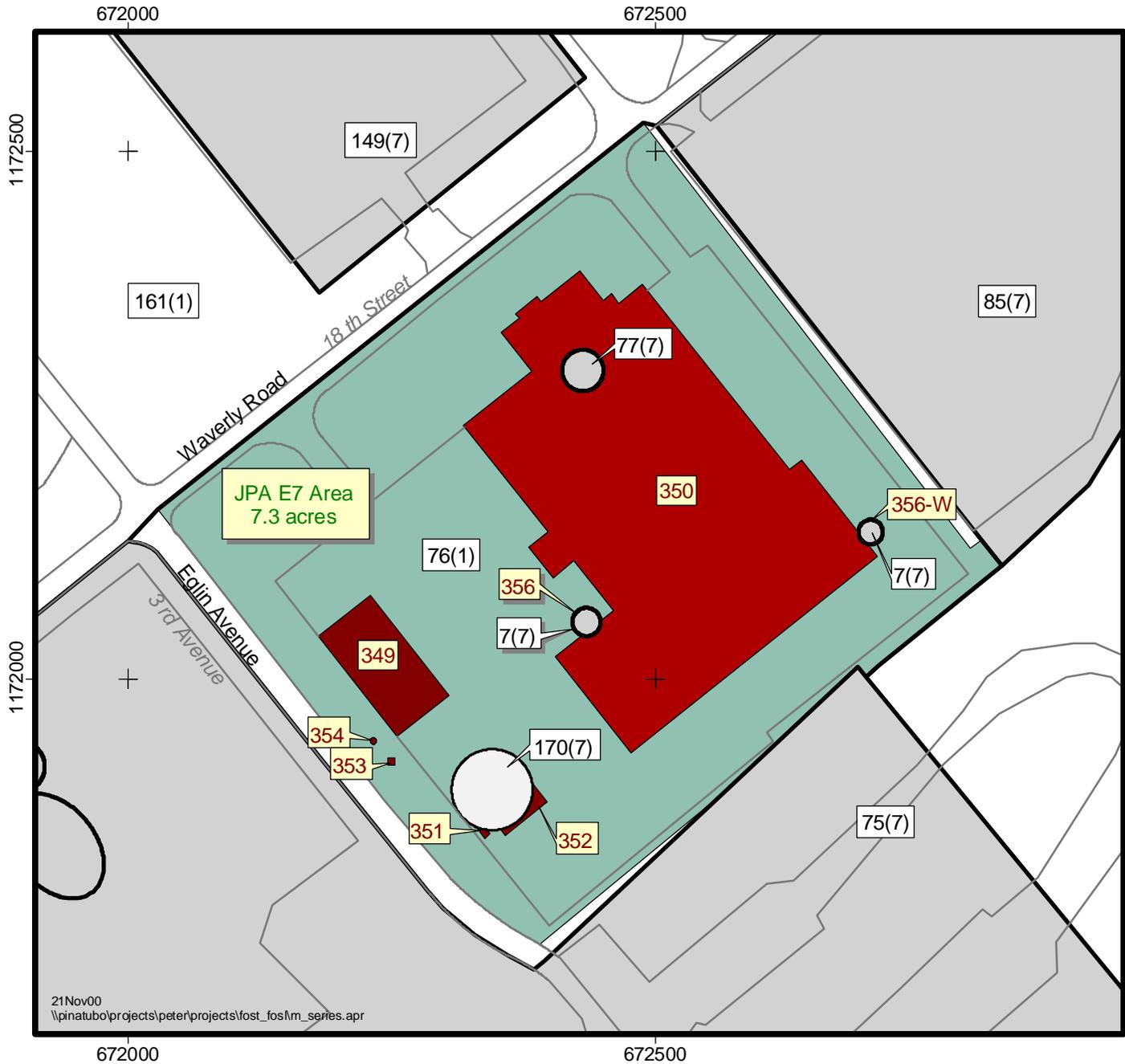
1150000

1150000

675000

700000

*State Plane feet, NAD 83*



**Figure 3**  
 Finding of Suitability to Transfer  
 Site Map  
**Building 350 Compound**

**Legend**

- Roads
- Buildings
- CERFA Parcels**
- Category 1
- Category 7
- JPA E7 Area

*former street names*  
 911-approved street names

N

0 50 100

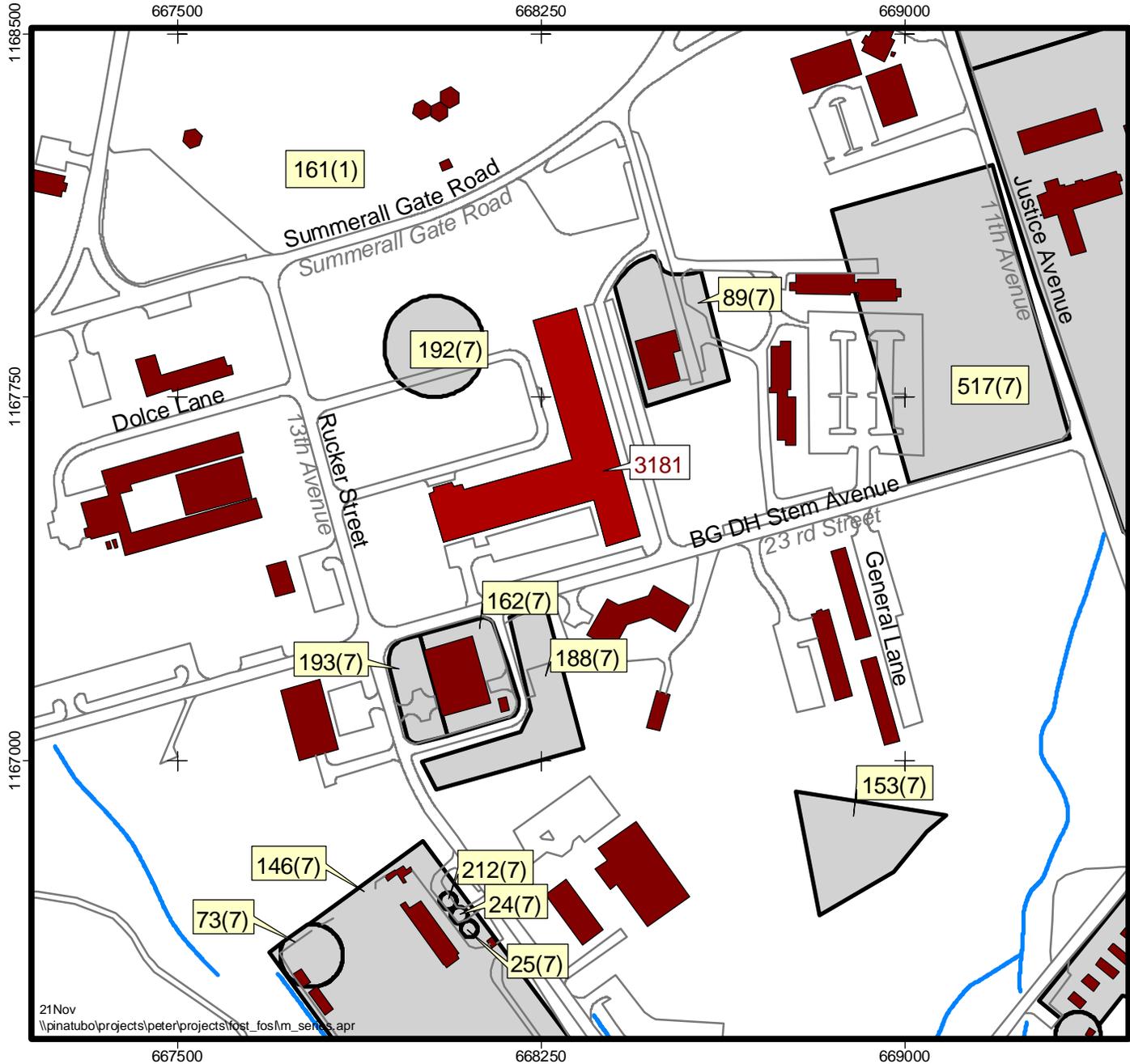
*State Plane feet, NAD83*

November 2000

U.S. Army Corps of Engineers  
 Mobile District  
 Fort McClellan  
 Calhoun County, Alabama  
 Contract No. DACA21-96-D-0018



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**Figure 4**  
 Finding of Suitability to Transfer  
 Site Map  
**Building 3181**

**Legend**

- Roads
- Buildings
- CERFA Parcels**
  - Category 1
  - Category 7

*former street names*  
 911-approved street names

N

0 150 300

State Plane feet, NAD83

November 2000

U.S. Army Corps of Engineers  
 Mobile District  
 Fort McClellan  
 Calhoun County, Alabama  
 Contract No. DACA21-96-D-0018

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## **ATTACHMENT 1**

# **ENVIRONMENTAL PROTECTION PROVISIONS**

# ATTACHMENT 1

## **ENVIRONMENTAL PROTECTION PROVISIONS**

The following conditions, restrictions, and notifications are to be included in the deed to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities at Fort McClellan.

### **INCLUSION OF PROVISIONS:**

The person or entity to whom the property is transferred shall neither transfer the property, lease the property, nor grant any interest, privilege, or license whatsoever in connection with the property without the inclusion of the environmental protection provisions contained herein, and shall require the inclusion of such environmental protection provisions in all further deeds, transfers, leases, or grant of any interest, privilege, or license.

### **NO LIABILITY FOR NON-ARMY CONTAMINATION:**

The U.S. Army shall not incur liability for response action or corrective action found to be necessary after the date of transfer, in any case, in which the person or entity to whom the property is transferred, or other non-Army entities is identified as the party responsible for contamination of the property.

### **NOTICE OF THE PRESENCE OF ASBESTOS-CONTAINING MATERIALS (ACM) AND COVENANT:**

- a. The Grantee is hereby informed and does acknowledge that friable and non-friable asbestos or asbestos-containing materials (“ACM”) have been found in Building 3181, as described in the EBS and in the Reisz Engineering Asbestos Surveys and Management Plans, FMC, Alabama. Except as provided for in (b) below, the ACM on the Property does not currently pose a threat to human health or the environment.
- b. Building 3181 has been determined to contain ACM that may pose a threat to human health. Detailed information is contained in the EBS and referenced asbestos surveys (Attachment 2). The non-friable ACM can be managed in place. The friable ACM can be effectively managed in place, provided the proper precautions are taken to eliminate exposure of personnel to airborne asbestos. The U.S. Army has agreed to transfer Building 3181 to the Grantee, prior to remediation of asbestos hazards, in reliance upon the express representation and promise that the Grantee will, prior to use or occupancy of said buildings, agree to undertake any and all abatement or remediation that may be required under applicable law or regulation. The Grantee acknowledges that the consideration for transfer of the Transferred Premises was negotiated based upon the Grantee’s agreement to the provision contained in this Condition.
- c. The Grantee agrees that its use and occupancy of the Transferred Premises will be in compliance with all applicable laws relating to asbestos; and that the U.S. Army assumes no liability for future remediation of asbestos or damages for personal injury, illness,

disability, or death, to the Grantee, its successors or assigns, or to any other person, including members of the general public, arising from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos or ACM on the Transferred Premises, whether the Grantee, its successors or assigns have properly warned or failed to properly warn the individual(s) injured. The Grantee agrees to be responsible for any future remediation of asbestos found to be necessary on the Transferred Premises. The Grantee assumes no liability for damages for personal injury, illness, disability, death or property damage arising from any exposure or failure to comply with any legal requirements applicable to asbestos in any portion of the Transferred Premises arising prior to the U.S. Army's transferring of such portion of the Property to the Grantee pursuant to this Deed, or any disposal of any asbestos or ACM prior to the transfer of the Transferred Premises.

- d. Unprotected or unregulated exposures to asbestos in product manufacturing, shipyard, building construction workplaces have been associated with asbestos-related diseases. Both the Occupational Safety and Health Administration (OSHA) and EPA regulate asbestos because of the potential hazards associated with exposure to airborne asbestos fibers. Both OSHA and EPA have determined that such exposure increases the risk of asbestos-related diseases, which include certain cancers and which can result in disability or death.
- e. The Grantee acknowledges that it has inspected the Property as to its asbestos content and condition and any hazardous or environmental conditions relating thereto prior to accepting the responsibilities imposed upon the Grantee under this subcondition. The failure of the Grantee to inspect, or to be fully informed as to the asbestos condition of all or any portion of the Property, will not constitute grounds for any claim or demand against the United States, or any adjustment under this Deed.
- f. The Grantee further agrees to indemnify and hold harmless the U.S. Army, its officers, agents and employees, from and against all suits, claims, demands or actions, liabilities, judgments, costs and attorneys' fees arising out of, or in any manner predicated upon exposure to the Grantee to asbestos contained wholly within the buildings on the Property, so long as the asbestos did not constitute a release or threat of release to the environment at the time of the Property transfer.

**NOTICE OF THE POTENTIAL FOR PRESENCE OF POLYCHLORINATED BIPHENYL (PCB) AND COVENANT:**

A. PCBs have been used widely as nonflammable insulating fluid in transformers, capacitors, and other electrical equipment, such as fluorescent light ballasts. PCBs are harmful because once released into the environment they are persistent (do not breakdown into other chemicals) and bio-accumulate in organisms throughout the environment. EPA considers PCBs to be possible cancer-causing chemicals.

B. PCBs at concentrations of 50 ppm or greater, when removed from service, must be stored and disposed according to regulations published in 40 CFR Part 761 Subpart D. The Grantee

is hereby informed that fluorescent light ballasts containing PCBs may be present on the Property. These ballasts do not currently pose a threat to human health or the environment and are presently in full compliance with applicable laws and regulations.

C. The Grantee agrees that its continued possession, use, and management of these ballasts (PCB Equipment) will be in compliance with all applicable laws relating to PCBs and PCB Equipment, and that the U.S. Army shall assume no liability for the future remediation of PCB contamination or damages for personal injury, illness, or disability or death to the Grantee, its successors or assigns, or to any other person, including members of the general public arising from or incident to future use, handling, management, disposition or any activity causing or leading to contact of any kind whatsoever with PCB Equipment. The Grantee agrees to be responsible for any remediation of PCB found to be necessary on the premises resulting from its use or possession thereof.

**NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP) AND COVENANT AGAINST THE USE OF THE PROPERTY FOR RESIDENTIAL PURPOSE:**

A. The Property does not contain structures or buildings suitable for residential dwellings. The Grantee is hereby informed and does acknowledge that Building 3181 on the Property was constructed prior to 1978 and is presumed to contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Exposure to lead from lead-based paint may place young children at risk of developing lead poisoning. Lead poisoning in young children may produce permanent neurological damage, including learning disabilities, reduced intelligence quotient, behavioral problems, and impaired memory. Lead poisoning also poses a particular risk to pregnant women.

B. Available information concerning known lead-based paint and/or lead-based paint hazards, the location of lead-based paint and/or lead-based paint hazards, and the condition of painted surfaces is contained in the Environmental Baseline Survey (EBS). The Grantee has been provided with the federally approved pamphlet on lead poisoning prevention. The Grantee hereby acknowledges receipt of all of the information described in this subparagraph.

C. The Grantee acknowledges that it has received the opportunity to conduct its own risk assessment or inspection for the presence of lead-based paint and/or lead-based paint hazards prior to execution of this document.

D. The Grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Real Property (means dwelling units, common areas, building exterior surfaces, and any surrounding lands, including outbuildings, fences, and play equipment affixed to the land, available for use by residents, but not including land use for agricultural commercial, industrial, or other non-residential purposed, and not including paint on the pavement of parking lots, garages, or roadways and buildings visited regularly by the same child, 6 years of age or under, or at least two different days within any week, including day-care centers, preschools and kindergarten classrooms) without complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards. Prior to permitting the occupancy of the

Property where its use subsequent to sale is intended for residential habitation (as defined above), the Grantee specifically agrees to perform, at its sole expense, the Army's abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential Lead-Based Paint Hazard Reduction Act of 1992) (hereinafter Title X).

The Grantee shall, after consideration of the guidelines and regulations established pursuant to Title X: (1) Perform a reevaluation of the Risk Assessment if more than 12 months have elapsed since the date of the last Risk Assessment; (2) Comply with the joint HUD and EPA Disclosure Rule (24 CFR 35, Subpart H, 40 CFR 745, Subpart F), when applicable, by disclosing to prospective purchasers the known presence of lead-based paint and/or lead-based paint hazards as determined by previous risk assessments; (3) Abate soil-lead hazards in pre-1978 residential real property, in accordance with the procedures in 24 CFR 35; (4) Abate lead-soil hazards following demolition and redevelopment of structures in areas that will be developed as residential real property; (5) Comply with the EPA lead-based paint work standards when conducting lead-based paint activities (40 CFR 745, Subpart L); (6) Perform the activities described in this paragraph within 12 months of the date of the lead-based paint risk assessment and prior to occupancy or use of the residential real property; and (7) Send a copy of the clearance documentation to the Grantor.

In complying with these requirements, the Grantee covenants and agrees to be responsible for any abatement or remediation of lead-based paint or lead-based paint hazards on the Property found to be necessary as a result of the subsequent use of the property for residential purposes. The Grantee covenants and agrees to comply with solid or hazardous waste laws that may apply to any waste that may be generated during the course of lead-based paint abatement activities.

The Grantee acknowledge that the seller of any interest in Residential Real Property is required to provide the buyer with any information on the LBP hazards form risk assessments or inspections in the seller's possession and notify the buyer of any known LBP hazards.

E. The Grantee further agrees to indemnify and hold harmless the Army, its officers, agents and employees, from and against all suits, claims, demands, or actions, liabilities, judgments, costs and attorney's fees arising out of, or in a manner predicated upon personal injury, death or property damage resulting from, related to, caused by or arising out of lead-based paint or lead-based paint hazards on the Property if used for residential purposes.

F. The covenants, restrictions, and requirements of this Section shall be binding upon the Grantee, its successors and assigns and all future owners and shall be deemed to run with the land. The Grantee on behalf of itself, its successors and assigns covenants that it will include and make legally binding, this Section in all subsequent transfers, leases, or conveyance documents.”

**NOTICE OF THE POTENTIAL PRESENCE OF ORDNANCE AND EXPLOSIVES (OE):**

Fort McClellan is a former military installation with a history of OE use and, therefore, there is a potential for OE to be present on the Property. Based on a review of existing records and available information, none of the [buildings or] land proposed for transfer is known to contain unexploded ordnance (UXO). In the event the JPA, its successors, and assigns, should discover any ordnance on the Property, it shall not attempt to remove or destroy it, but shall immediately notify the local Police Department and competent GRANTOR or GRANTOR designated explosive ordnance personnel will be dispatched promptly to dispose of such ordnance at no expense to the GRANTEE. A notice will be included in the deed.

**CONDITIONS, RESTRICTIONS, AND COVENANTS BINDING AND ENFORCEABLE:**

These restrictions and covenants are binding on the Grantee, its successors and assigns; and shall run with the land; are forever enforceable; shall benefit the public in general and the territory surrounding the Property, including lands retained by the United States; and shall further the common environmental objectives of the United States and the State of Alabama; and are therefore enforceable by the United States Government and the State of Alabama.

## **ATTACHMENT 2**

### **ASBESTOS CONTAINING MATERIAL REPORT BUILDING 3181**

ASBESTOS CONTAINING BUILDING MATERIALS SURVEY  
CLASSROOM  
BUILDING 3181

FORT McCLELLAN, ALABAMA

U.S. ARMY CONTRACT NO. DABT02-96-D-0005  
DELIVERY ORDER 0005

*Fort McClellan*



*Staying Beautiful*

*Conducted and Prepared by:*

**REISZ ENGINEERING**  
P.O. BOX 1349

HUNTSVILLE, ALABAMA 35807  
ASBESTOS CONTAINING BUILDING MATERIALS SURVEY  
CLASSROOM  
BUILDING 3181

FORT McCLELLAN, ALABAMA

U.S. ARMY CONTRACT NO. DABT02-96-D-0005  
DELIVERY ORDER 0005

*Prepared For:*

DIRECTORATE OF ENVIRONMENT  
FORT McCLELLAN

---

APPROVED FOR TRANSMITTAL BY  
JAMES R. WRIGHT

*Conducted and Prepared by:*

**REISZ ENGINEERING**

June, 1998

## TABLE OF CONTENTS

1.0	PURPOSE AND SCOPE OF SERVICES.....	1
2.0	REGULATORY STANDARDS.....	2
3.0	PROJECT CHARACTERISTICS.....	3
4.0	SURVEY METHODOLOGY.....	4
5.0	LABORATORY ANALYSIS .....	5
6.0	SUSPECT MATERIALS.....	5
7.0	ASBESTOS INSPECTION AND SAMPLING RESULTS.....	6
	FRIABLE ACM.....	7
	NON FRIABLE ACM.....	7
	INACCESSIBLE MATERIAL.....	8
8.0	CONCLUSIONS AND RECOMMENDATIONS.....	8
9.0	ASSUMPTIONS AND LIMITATIONS.....	8

### APPENDICES

- APPENDIX A - REPORT OF LABORATORY ANALYSIS
- APPENDIX B - SUMMARY TABLE OF ACM
- APPENDIX C - SAMPLE LOCATIONS PLANS
- APPENDIX D - SELECTED ACM LOCATIONS PLANS
- APPENDIX E - SELECTED ACM PHOTOGRAPHS (None)

## **1.0 PURPOSE AND SCOPE OF SERVICES**

The purpose of this survey was to locate and identify asbestos containing building materials at Building 3181 located at Fort McClellan, Alabama. Pursuant to the Contract, REISZ Engineering was required to provide the survey in accordance with AHERA (40 CFR Part 763 Subpart E) protocol. AHERA is applicable to interior building products installed prior to October 12, 1988. AHERA does not apply to the exterior of buildings and does not apply to non-building materials (e.g. cabinetry, special equipment and chalkboards). REISZ Engineering has included as part of the survey those readily accessible, suspect friable interior non-building materials (e.g. vibration dampers); but has not included certain items (e. g. interior linings of equipment and special supplies, some non-friable materials such as transite, etc.). Exterior building materials were not sampled as part of this contract unless those materials were suspected to be of friable nature and continuous with indoor materials (e.g. piping insulation). Specifically, REISZ Engineering was contracted to provide the following services:

1. Identify and collect samples of accessible suspect friable building materials within the referenced project area.
2. Perform a visual inspection to provide information on material condition, material quantities, material locations, and building use.
3. Analysis of all bulk samples for asbestos content utilizing Polarized Light Microscopy and Dispersion Staining Techniques performed in accordance with EPA Bulk Analysis Method  
EPA 600/M4-82-020.
4. Make recommendations as to response actions pertaining to those materials identified as asbestos containing.

5. Compilation of a final report (contained herein) which details all sample results, identifies sample locations, and provides recommendations based upon the results.
6. Preparation of a Building specific Operations & Maintenance (O&M) Plan for buildings containing friable asbestos materials.

## 2.0 REGULATORY STANDARDS

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) requires the Owner or Operator of a facility to determine the presence or non-presence of asbestos containing materials prior to conducting renovation or demolition activities. The NESHAP Standard for asbestos (40CFR Part 61 Sub-part M) requires the use of engineered control procedures for removal of asbestos materials that are or will become friable during renovation or demolition. The removal must occur before renovation or demolition activities impact those materials.

On October 11, 1994 an OSHA promulgated regulation (29 CFR Part 1926.1101) became effective. This Standard is related to asbestos exposure in construction, renovation and building maintenance work places. Building owners are required, pursuant to the Standard, to notify employees, tenants and prospective employers (contractors) of the presence, location and quantities of ACM in the building. Implementation of the "communication of hazards" provisions in the Standard were originally to be not later than April 10, 1995 but was extended to July 10, 1995 and is now in effect. The OSHA Standard does not apply to work performed by employees of State agencies in states without state run OSHA programs (e.g. Alabama).

In October 1986, the Asbestos Hazard Emergency Response Act (AHERA) was signed into law. Included in this act are provisions directing E.P.A. to establish rules and regulations

(40CFR Part 763) addressing asbestos-containing materials in schools. Specifically, the E.P.A. was directed to address the issues of: 1) identifying, 2) evaluating, and 3) controlling asbestos containing materials (ACM) in schools. AHERA requires schools to perform building inspections and to prepare management plans for ACM control. Although the AHERA regulation does not specifically apply to this project it is generally accepted as the industry standard and was cited by Fort McClellan in the Asbestos Survey Request as the basis of survey methodology. The AHERA inspections must be conducted using specific guidelines that include a minimum number of samples per material type. This survey was conducted in accordance with those guidelines per the Contract requirements.

On November 28, 1992 a law became effective which extended the EPA's Model Accreditation Plan to all public and commercial buildings. Currently the rule extends the accreditation requirements of persons performing asbestos work (inspectors, project designers, abatement supervisors, and workers) in public and commercial buildings, but does not extend the other aspects of AHERA. This project was conducted utilizing EPA accredited personnel.

### 3.0 PROJECT CHARACTERISTICS

During the month of June 1997, Reisz Engineering accredited Asbestos Inspectors performed inspections of Building 3181 for the purpose of identifying building materials suspected to contain asbestos. Building 3181 is a large classroom facility containing approximately 120,000 sq. ft. of floor space. Based on information provided by Fort McClellan representatives the building was originally constructed in 1941. Various renovations may have taken place since the building was originally constructed but no building plans have been found which can be used to verify specific dates and activities.

The dominant flooring conditions existing in the facility are 1) 12x12 vinyl floor tile, and 2) 9x9 vinyl floor tile. Several types of suspect pipe insulations are found on pipe throughout the building.

#### 4.0 SURVEY METHODOLOGY

The building was visually inspected for the presence of material suspected to contain asbestos. Those suspect materials were identified, bulk samples were obtained and placed into individual vials for transportation to the University of Alabama in Huntsville. General areas for sample locations were selected on a random basis with a preference for exact positioning at existing damage. Each sample location is represented by a number on the plans in Appendix C. Those numbers directly correspond with the numbers listed elsewhere in this report.

If any additional suspect materials are identified during renovation or demolition they should be analyzed for asbestos content. Materials visibly identifiable as non-asbestos (fiberglass, foam rubber, wood, etc.) were not sampled. Materials installed after October 12, 1988 (as reported by Fort McClellan staff) were not sampled.

#### Hazard Assessment Factors

Each time suspect ACM was sampled, it was classified as either a friable or a non-friable material. Friable material may be crumbled, pulverized, or reduced to powder by hand pressure. Friable ACM is more hazardous than non-friable ACM because friable material can release airborne asbestos fibers more easily. In assessing the fiber release potential, the current condition of all ACM identified was noted. Evidence of deterioration, physical damage, water

damage, erosion of ACM due to its' proximity to an air plenum, high vibration, or contact potential was also noted.

## 5.0 LABORATORY ANALYSIS METHODOLOGY

All bulk samples were analyzed at UAH by polarized light microscopy utilizing dispersion staining or Becke line techniques, in accordance with the EPA's "Interim Method for Determination of Asbestos in Bulk Insulation Samples" (EPA 600/m4-82-020). Quality control samples were taken as duplicates at a rate of 1 to 10 and were sent to a second accredited laboratory. This type of analysis requires the microscopist to take a portion of the bulk sample and treat it with an oil of specific refractive index. This prepared slide is then subjected to a variety of optical tests.

Each type of asbestos displays unique characteristics when subjected to these tests. Percentages of the identified types of asbestos are determined by visual estimation. Even though this is an estimation, any material that contains greater than one percent of any type of fibrous asbestos is considered ACM and must be handled according to OSHA and EPA regulations if disturbed during maintenance, renovation, demolition or removal.

The UAH laboratory participates in the American Industrial Hygiene Association (AIHA) quality assurance program for polarized light microscopy and is accredited by the AIHA through their voluntary program.

## 6.0 SUSPECT MATERIALS

The following is a general list of building materials that were suspected to contain asbestos. A complete and more detailed description of these substances can be found in Appendix B.

#### Surfacing

- None

#### Thermal System Insulation

- White chalky insulation is found on piping straight runs throughout the building
- White paper-like insulation is found on some piping straight runs
- White pipe fitting insulation is found on various pipes in the building

#### Miscellaneous Material

- 12x12 vinyl floor tile
- 9x9 vinyl floor tile
- Vinyl flooring mastic

### 7.0 ASBESTOS INSPECTION AND SAMPLING RESULTS

A total of 21 bulk samples were collected and analyzed. Samples #31 & 32 are out of sequence and should be labeled #'s 20 & 21. Details of all laboratory results can be found in Appendix A. A listing of all suspect materials, their corresponding sample numbers, general location, and approximate quantity are indicated in Appendix B. A narrative description of all "Friable Asbestos Containing Material" and "Non-Friable ACM" identified during the survey, is given below.

## FRIABLE ACM

Laboratory analysis determined asbestos is present in three types of friable materials: 1) white paper-like pipe insulation, and 2) white powdery pipe insulation, and 3) white pipe fitting insulation.

- 1) A friable, white, chalky asbestos containing insulation compound is applied to 8 & 12 inch pipes throughout the 1<sup>st</sup> floor and in some cases the crawlspace of Building 3181.
- 2) A friable, white air-cell type asbestos containing pipe insulation is found on runs of 6 inch piping throughout Building 3181.
- 3) A friable, white, asbestos containing pipe fitting insulation is found applied to various pipes in Building 3181.

## NON FRIABLE ACM

Three types of non-friable ACM were found to be present in the building: 1) 12x12 inch vinyl floor tile, 2) 9x9 inch vinyl floor tile, and 3) mastics associated with vinyl floor tile.

- 1) Asbestos containing 12x12 inch vinyl floor tile is found in various locations of the building.
- 2) Asbestos containing 9x9 inch vinyl floor tile is found in various location of the the building.
- 3) Asbestos containing mastics associated with vinyl floor tile is found throughout the majority of the building.

## INACCESSIBLE MATERIAL

Insulation and spray-on compounds associated with inaccessible crawl-space and tunnel areas may should be assumed as "like" materials corresponding to materials sampled within the building.

## 8.0 CONCLUSIONS AND RECOMMENDATIONS

None of the materials identified within this report are damaged to the extent that significant asbestos fiber release may be likely under normal conditions. Proper management of the material in-place may be acceptable assuming the proper precautions are taken to eliminate exposure of personnel to any airborne asbestos. Reisz Engineering has written a Building Operations & Maintenance Plan for Building 3181 and we suggest that recommendations included in this plan be followed.

## 9.0 ASSUMPTIONS AND LIMITATIONS

The results, findings, conclusions and recommendations expressed in this report are based only on conditions that were observed during the inspections of Building 3181 during June, 1997. Reisz Engineering and this report make no representation or assumptions as to past conditions or future occurrences.

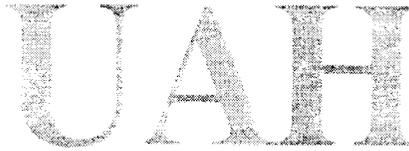
Our inspection was generally non-destructive in nature. Any conditions or materials that were not visible on the surface were not inspected and may differ from those observed. It was not within the scope of this investigation to remove surface materials to investigate portions of the structure or materials that may lie beneath the surface. Our selection of sample locations and

frequency is based upon our observations and the assumption that all materials in the same area are homogeneous.

This report is designed to aid the building owner, architect, construction manager, general contractors, and potential asbestos abatement contractors in locating ACM. Under no circumstances is this report to be utilized as a bidding document or as a project specification document.

## **APPENDIX A**

### **REPORT OF LABORATORY ANALYSIS FOR ASBESTOS**



Environmental Laboratory  
 Kenneth E. Johnson Research  
 Center

The University of Alabama in Huntsville

Huntsville, Alabama 35899  
 Phone: (205) 890-6391  
 Fax: (205) 890-6376

Re : Bulk Asbestos  
 Analysis EPA  
 600/R-93/116  
 AIHA: 023601

Receipt Date: 06/27/97

Sample Date : 06/24-26/97

Client: Reisz Engineering  
 Building 32 Suite, A2  
 3322 Memorial Parkway South  
 Huntsville, AL 35801

Microscopist: Tom Canington

Sample/Description	Asbestos Fibers (%)			Non-Asbestos Material (%)					
	Chry	Amos	Croc	Othr	Cell	Fbgl	MW	CaSO4	Othr
B3181-01/ Pipe Insul (black rock-looking)					5	15			80
B3181-02/ Pipe Insul (brown rock-looking)						80			20
B3181-03/ Pipe TSI (orange rock-looking)						85			15
B3181-04/ Pipe TSI (black cork)					5				95
B3181-05/ Pipe TSI 12" paperlike	10					80			10
B3181-06/ Pipe TSI 12" White powder	10	45	3				12		30
B3181-07/ Pipe TSI 8" White powder	5	50	10						35
B3181-08/ Pipe TSI 8" Paperlike	25					65			10
B3181-09/ Pipe TSI 8" paperlike						90			10

ry = Chrysotile  
 Amos = Amosite  
 Croc = Crocidolite

Othr = Other  
 Cell = Cellulose

MW = Mineral Wool  
 Ca S04 = Calcium Sulfate  
 Fbgl = Fiberglass



# UAH

Environmental Laboratory  
Kenneth E. Johnson Research  
Center

The University of Alabama in Huntsville

Huntsville, Alabama 35899  
Phone: (205) 890-6391  
Fax: (205) 890-6376

Re : Bulk Asbestos  
Analysis EPA  
600/R-93/116  
AIHA: 023601

Receipt Date: 08/04/97

Sample Date : 07/31/97

Client: Reisz Engineering  
Building 32 Suite, A2  
3322 Memorial Parkway South  
Huntsville, AL 35801

Microscopist: Tom Canington

Sample/Description	Asbestos Fibers (%)			Non-Asbestos Material (%)		
	Chry	Amos	Croc Othr	Cell	Fbgl	MW CaSO4 Othr
B3181-31/6" dia. pipe Insul (paper)		30		50		20
B3181-32/ 6" dia. pipe Elbow insulation		45			25	30

ry = Chrysotile  
Amos = Amosite  
Croc = Crocidolite

Othr = Other  
Cell = Cellulose

MW = Mineral Wool  
Ca SO4 = Calcium Sulfate  
Fbgl = Fiberglass

**APPENDIX B**

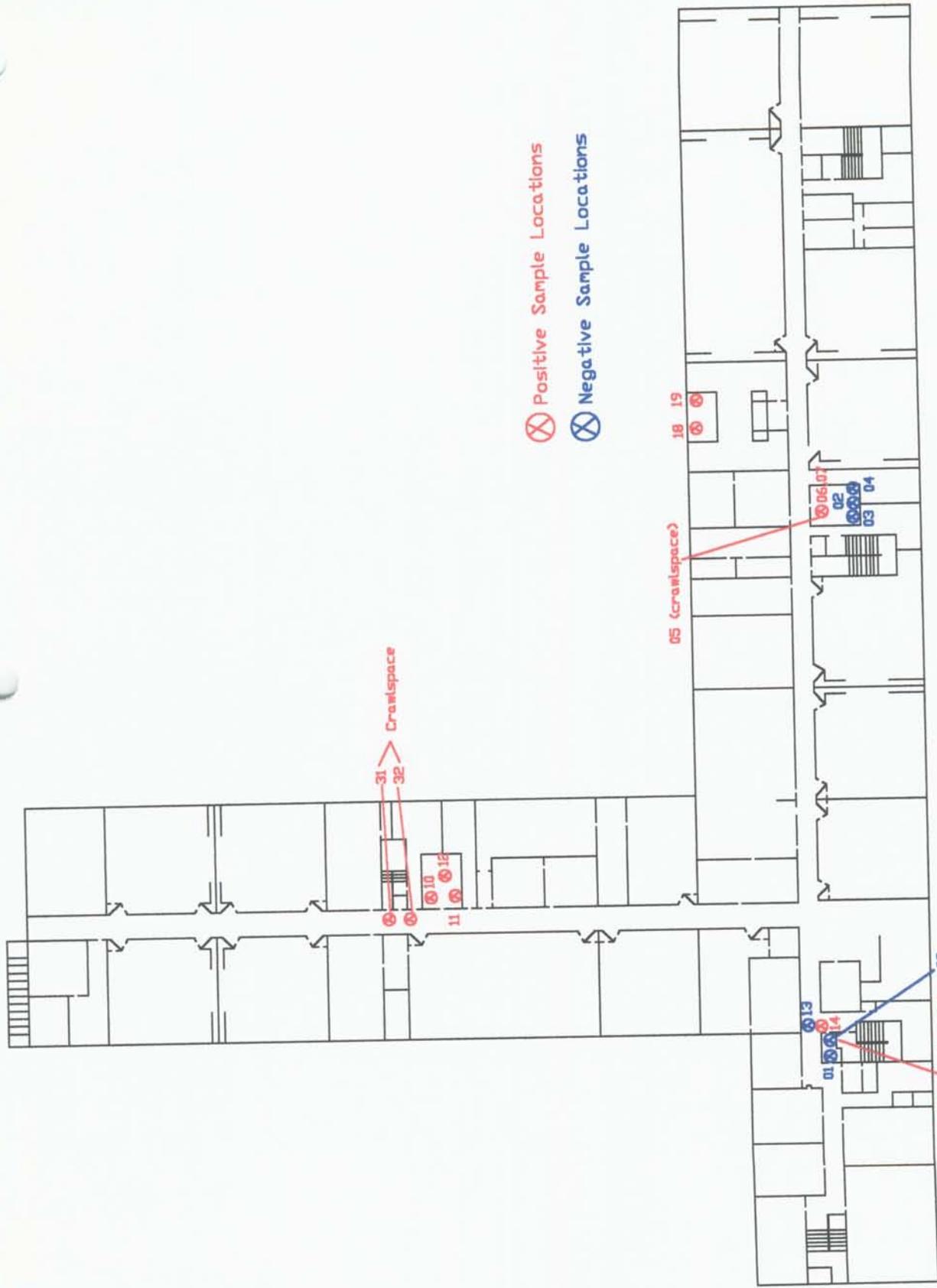
ASBESTOS CONTAINING MATERIALS

**SUMMARY TABLE  
ASBESTOS CONTAINING MATERIALS  
CLASSROOM  
BUILDING 3181  
FORT McCLELLAN, ALABAMA**

<b>SAMPLE #(S)</b>	<b>Description of Materials</b>	<b>General Location of Material</b>	<b>Quantity (approx.)</b>
B3181-05	White air-cell type pipe insulation	12 inch piping throughout building	700 linear ft.
B3181-06,07	White powdery pipe insulation	8 & 12 inch pipe insulation, length of bldg.	300 linear ft.
B3181-08,09	White air-cell type pipe insulation	8 inch piping throughout building	1,000 linear ft.
B3181-10,31	White air-cell type pipe insulation	6 inch piping associate with AH #7	260 linear ft.
B3181-11,12,32	Pipe fitting insulation	On 6 inch piping at AH #7	30 fittings
B3181-14	Mastic associated with 12x12 floor tile	Under 12x12 floor tile Throughout building	13,200 sq. ft.
B3181-15,16,18,19	9x9 inch floor tile & mastic throughout building	Throughout various Locations in building	15,824 sq. ft.

**APPENDIX C**

SAMPLE LOCATIONS PLANS



LAYOUT PLAN

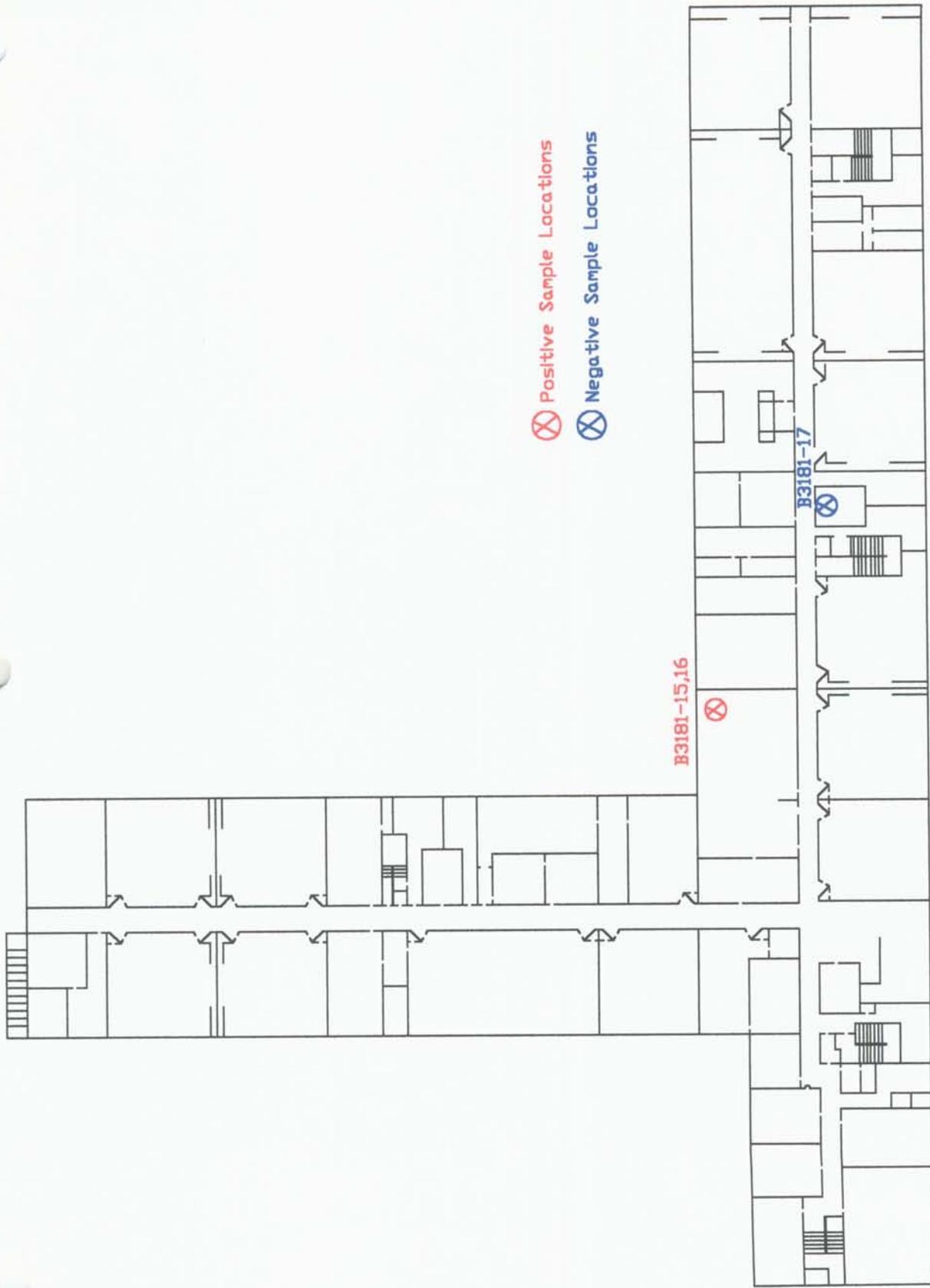
FIG 1:

**REISZ ENGINEERING**

ASBESTOS SURVEY  
 DABT02-96-D-0005  
 FM705

FIG. 1 FIRST FLOOR

BUILDING: 3181



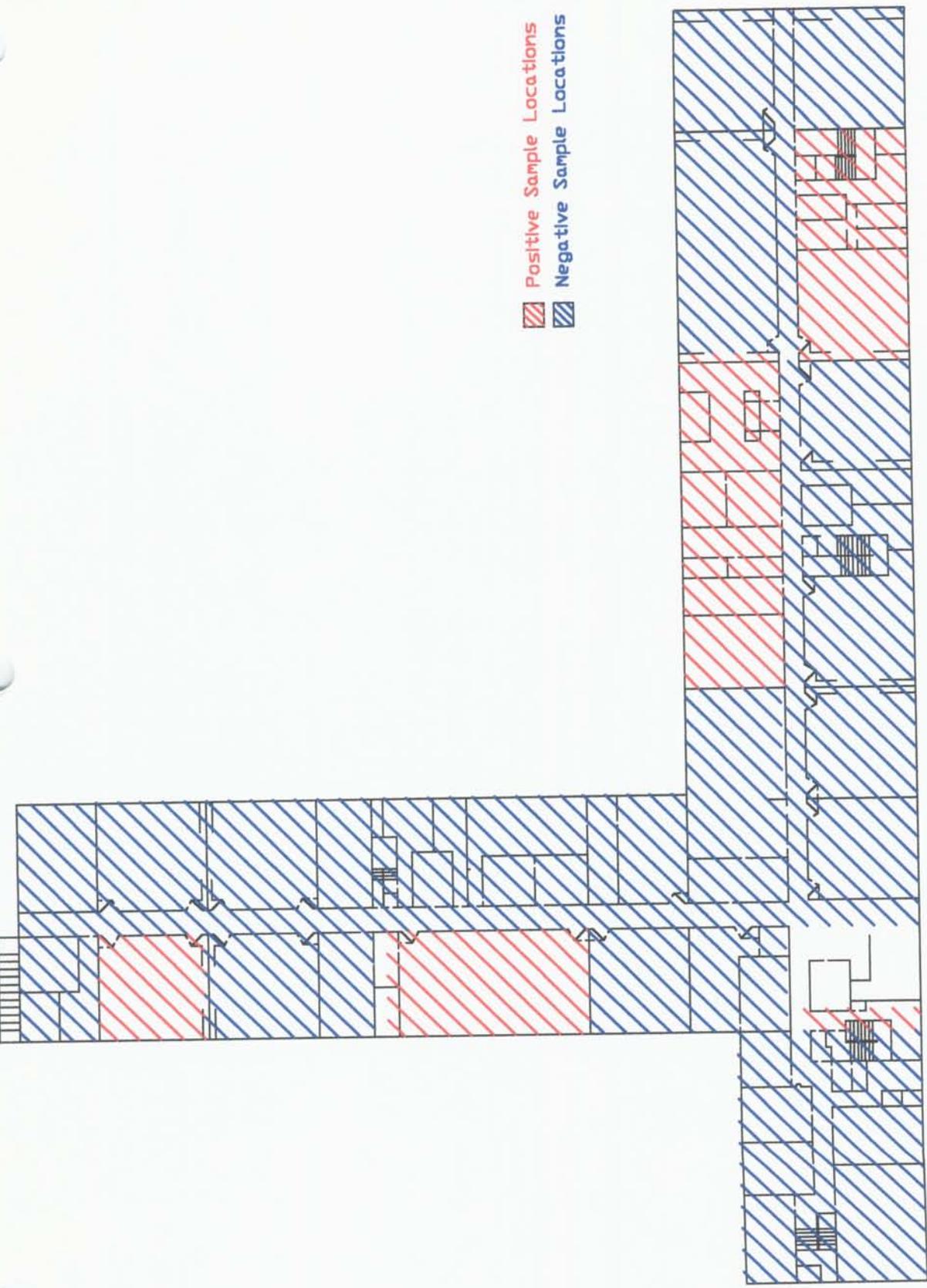
⊗ Positive Sample Locations  
⊗ Negative Sample Locations

FIG 1: LAYOUT PLAN

BUILDING: 3181	FIG. 1 SECOND FLOOR	ASBESTOS SURVEY DABT02-96-D-0005 FM705	<b>REISZ ENGINEERING</b>
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**APPENDIX D**

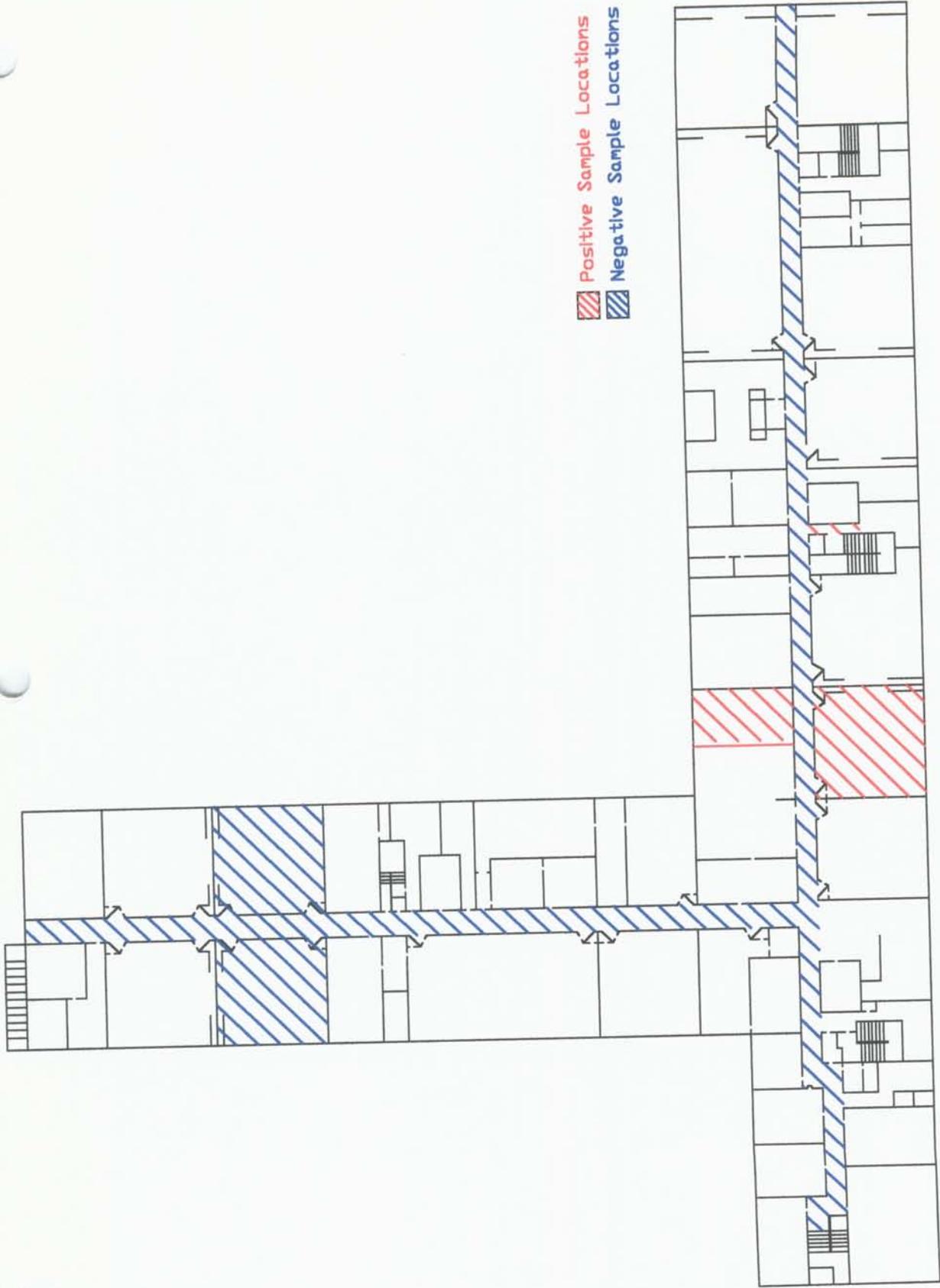
**SELECTED ACM LOCATION PLANS**



▨ Positive Sample Locations  
▨ Negative Sample Locations

FIG 1: LAYOUT PLAN

BUILDING: 3181	FIG. 1 FIRST FLOOR	ASBESTOS SURVEY DABT02-96-D-0005 FM705	<b>REISZ ENGINEERING</b>
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▨ Positive Sample Locations  
▨ Negative Sample Locations

FIG 1: LAYOUT PLAN

ASBESTOS SURVEY  
 DABT02-96-D-0005  
 FM705

**REISZ ENGINEERING**

FIG. 1 SECOND FLOOR

BUILDING: 3181

**ATTACHMENT 3**

**RESPONSE TO COMMENTS BY ADEM AND EPA**

**RESPONSE TO COMMENTS**  
**BY ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**DRAFT FINDING OF SUITABILITY TO TRANSFER**  
**JPA E7 TRANSFER**  
**FORT MCCLELLAN, ALABAMA**

*General Comments*

**Comment 1:** ADEM is aware that the language will be changing for the “No Further Action” as to the specifics of the land use and the land use controls. This language change was discussed in the September BRAC Cleanup Team (BCT) meeting.

Response: As agreed upon during the September BCT meeting, Parcels 170(7), 77(7), and 7(7) have been released for unrestricted reuse, therefore, there is “No Further Action” required.

**Comment 2:** There are several buildings that are discussed in this FOST. Only Building 3181 has been suggested to have asbestos and lead-based paint. Please check and verify if any other buildings have been tested for asbestos and lead-based paint.

Response: Except for Building 3181, all other facilities within Building 350 Compound were built in 1991 or after. Buildings surveyed for LBP and asbestos were those facilities built prior to 1978 and 1987, respectively. LBP and asbestos are not issues of concern for the facilities within Building 350 Compound.

*Specific Comments*

**Comment 1:** List of Acronyms: The acronym list is incomplete. Please add the following acronyms:  
AST  
VCR  
CFR  
Co-60  
Cs-137

Response: Technical editing rules dictate that if a word is spelled out and used only once in the document, it should not be included in the list of acronyms, however, the list of acronyms in the final report will be revised to reflect the comment.

**Comment 2:** Page 2, Section 2.0, 1<sup>st</sup> paragraph, Lines 3-4: Is there a “7” after “Safety Clean”? If not please delete the “7”.

Response: Safety Kleen7 is the correct nomenclature.

**Comment 3:** Page 2, Section 2.0, 1<sup>st</sup> paragraph, 6<sup>th</sup> line: What are M12 and M17 decontamination units? Please clarify.

then been submitted, therefore, the word preliminary will not be used in the final FOST document.

**Comment 10: Table 3: Remedial Actions: The word “Preliminary” should not be used in the final FOST. Please clarify.**

Response: At the time the draft FOST document was submitted, site investigation (SI) results were still preliminary, however, a final SI version has since then been submitted, therefore the word preliminary will not be used in the final FOST document.

**Comment 11: Figure 1: This figure needs “Calhoun County” identified on the Alabama map.**

Response: Figure 1 will be revised accordingly.

**Comment 12: Figure 2: This figure is lacking detail. Some details, if included in the figure, would help reference the property of concern to other areas in the depicted yellow area. Because there is no scale on the figure, it is hard to reference the property of concern to other areas of potential interest (roads, other buildings, creeks, etc.). Please include more details and a scale in the figure.**

Response: Figure 2 will be revised to reflect the comment.

**Comment 13: Figure 3: This figure is lacking detail. Please add details (road names and/or other features) that would make it reference better to Figure 2.**

Response: Figure 3 will be revised to reflect the comment.

**Comment 14: Figure 4: This figure is lacking detail. Please add details (road names and/or other features) that would make it reference better to Figure 2.**

Response: Figure 4 will be revised to reflect the comment.

Response: The text will be revised to reflect the comment.

**Comment 2:** **Section 1.0 Purpose. Please describe the intended use of the property, since this information is part of a suitability determination. The FOST indicates that the use will be consistent with the Fort McClellan Comprehensive Reuse Plan, but information specific to the use of this parcel would support the Finding of Suitability to Transfer.**

Response: The Final Decision Document based on site investigation results indicate that Building 350 Compound has been released for unrestricted reuse including residential, industrial, commercial, and recreational. Building 350 Compound and Building 3181 will be used consistent with the FTMC Comprehensive Reuse Plan.

**Comment 3:** **Section 3.1 Environmental Condition of Property Categories. This section states that a "No further Action" was recommended for this parcel. Please note that the language "No Further Action" conveys the notion that a prior removal or other response action addressed the contamination and eliminated the need for further remedial action. There is no description, however, of such prior action. The FOST, therefore, appears to refer to a "No Action" decision.**

Response: While it is understood that the comment refers to a remedial action and that no remedial action was taken on the property, the Army took action by conducting a site investigation and the results indicated that no further action was necessary.

**Comment 4:** **Attachment 1. Environmental Protection Provisions. Paragraph D. of the Notice of the Presence of Lead-Based Paint (LBP) and Covenant Against the Use of the Property for Residential Purpose. Since Lead-Based Paint poses a particular risk to children, the "Notice of the Presence of Lead-Based Paint (LBP) and Covenant Against the Use of the Property for Residential Purpose" should include in its covenant against the use of the property for uses for residential use, *other child occupied facilities* (e.g., day care centers, preschools, and kindergarten classrooms visited regularly by children under 6 years of age). Please amend the first sentence of Paragraph D of the covenant, inserting "which includes other child-occupied facilities (e.g., day care centers, preschools, and kindergarten classrooms visited regularly by children under 6 years of age)," after "Residential Real Property". Please revise the second sentence of Paragraph D of the covenant, inserting "as defined above," after "residential habitation."**

Response: The text will be revised to reflect the comment.