

FINAL
FINDING OF SUITABILITY TO TRANSFER (FOST)
WASTEWATER TREATMENT PLANT PARCEL 217(1)
FORT MCCLELLAN, ALABAMA

On the basis of the Community Environmental Response Facilitation Act (CERFA) Letter Report for Fort McClellan (FMC), environmental documents maintained in the Administrative Record, and associated visual site inspections, I have determined that the Wastewater Treatment Plant (WWTP), Parcel 217(1) (the Property), at Fort McClellan, Alabama, is suitable for transfer to the Water Works and Sewer Board of the City of Anniston for operation of the sewer and wastewater treatment systems. The Property to be assigned and transferred includes two buildings and four structures related to treatment plant operations. The fee interest to be transferred is 7.08 acres (Figure 1). The WWTP is referred to as Facility Number 05740. The facility includes headworks, water reuse equipment, piping, machinery, valves, basins, controls, sludge drying, and disposal facilities related to and necessary for plant operations. Two support buildings, Building 05708 - Power Plant Building and Building 05718 - Sewage Waste Treatment Building, are located on the Property. The remaining structures on the Property (05708-E, stand-by generator; 05709, oil/grease separator; 05710, overhead protection for sludge containment pad; and, 05711, sludge containment pad) support wastewater treatment plant operations and are used for no other purposes.

A determination of the environmental conditions of the Property was made by the U.S. Department of the Army by: a detailed search of federal government records pertaining to the property; recorded chain of title documents regarding the real property; aerial photographs that reflect prior uses of the real property; a visual inspection of the real property and any buildings, structures, equipment, pipe, pipeline, or other improvements on the real property, and a visual inspection of properties immediately adjacent to the real property; a physical inspection of property adjacent to the real property; federal, state, and local government records of each adjacent facility where there has been a release of any hazardous substance or any petroleum product or its derivatives, including aviation fuel and motor oil, and which is likely to cause or contribute to a release or threatened release of any hazardous substance or any petroleum product or its derivatives, including aviation fuel and motor oil, on the real property; and interviews with current or former employees involved in operations on the real property.

The Army's document review included Environmental Baseline Survey (EBS) and CERFA Letter Report (January 1998); U.S. Environmental Protection Agency Region IV (USEPA) and Alabama Department of Environmental Management (ADEM) concurrence to the CERFA Report; Radon Monitoring Report (June 1991); Underground Storage Tank (UST) Summary Report (June 1998); Biological Assessment Report (April 1998); Final Environmental Impact Statement Disposal and Reuse of FMC Alabama (August 1998); U.S. Department of Defense (DoD) Base Realignment and Closure Ordnance, Ammunition and Explosives, Chemical Warfare Materials Archives Search Report Findings FMC Anniston, Alabama Final (July 1999); FMC Reuse and Redevelopment Authority (FMRRA) FMC Comprehensive Reuse Plan (November 1997); and National Pollution Discharge Elimination System (NPDES) permit No. AL0024520. The review indicates the following environmental condition of the Property:

- Based on a review of existing records and available information, there is no evidence that hazardous substances were stored, released, or disposed on the property in excess of the reportable quantities listed in 40 CFR Part 373. Accordingly, there is no need for any notification of hazardous substance, release, or disposal.

- The WWTP operates under NPDES permit number AL0024520 issued by ADEM. The plant is permitted to accept up to 2.2 million gallons per day. The current permit expires on September 30, 1999.
- There are no existing buildings constructed prior to 1978 on the Property. Therefore, the two buildings located at the WWTP are considered to be free from lead-based paint hazards in accordance with Section 10.18, Title X of the Residential Lead-Based Paint Reduction Act of 1992.
- There are no buildings or structures with ACM on the Property.
- No radon surveys have been conducted on the Property.
- No radiological surveys have been conducted on the Property. The Property was not used to repair, maintain, or store radioactive commodities.
- There are no PCB containing transformers located on the property. There have been no reported releases of PCB-containing dielectric fluids on the Property. It is possible that some fluorescent light ballasts may contain PCBs in the potting material in excess of 50 ppm. If removed by the grantee, PCBs and PCB-contaminated materials must be stored in an approved hazardous waste storage facility and disposed in accordance with applicable regulations.
- No underground storage tanks or aboveground storage tanks are present on the Property.
- No groundwater monitoring wells are present on the Property.
- Sludge is generated from wastewater treatment plant operations. The sludge is transferred to a concrete pad/containment area with overhead protection on the Property. The sludge is dried and maintained until transferred to the Calhoun County Transfer Station. The sludge is classified as a Class B non-hazardous material.
- Moderate quality gray bat foraging habitat is located within 50 feet of the WWTP as documented in the Biological Assessment (BA) dated April 1998. Appropriate endangered species notice is provided in Sections 2.6.7 and 2.6.8 of the BA and will be included in the deed.
- National Environmental Policy Act (NEPA) requirements for this transfer were satisfied by the analyses conducted in the Final Environmental Impact Statement Disposal and Reuse of FMC Alabama (August 1998) and the accompanying Record of Decision, dated June 25, 1999.

On the basis of the above information, I conclude that the Wastewater Treatment Plant should be assigned to DoD Environmental Condition Category 1 (areas where no release or disposal of hazardous substances or petroleum products has occurred [including no migration of these substances from adjacent areas]), and is transferable under CERCLA Section § 120 (h)(4). The deed for this transaction will contain:

- The clause under CERCLA § 120 (h)(4)(D)(i) warranting that any response or corrective action found to be necessary after the date of such sale or transfer shall be conducted by the United States.
- The covenant under CERCLA § 120 (h)(4)(D)(ii) granting the United States access to property in any case in which a response action or corrective action is found to be necessary after or such access is necessary to carry out a response action or corrective action on adjoining property.

PHILIP E. SAKOWITZ, JR.
Deputy Chief of Staff
Base Operations Support
Headquarters United States Army
Training and Doctrine Command