



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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January 4, 2002

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

RE: ADEM Review and Concurrence: Final Report - Ordnance and Explosives Surface Clearance for Construction Support at the Proposed Eastern Bypass, dated October 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 the subject *Final Report - Ordnance and Explosives Surface Clearance for Construction Support at the Proposed Eastern Bypass*, dated October 2001. The Department finds that the Final Report adequately addresses ordnance and explosives (OE) issues and results concerning surface clearance construction support activities. The OE surface clearance protocols related to Eastern Bypass construction have been generally addressed in several Base Realignment and Closure Team (BCT) and Restoration and Advisory Board (RAB) meetings. Based on such historical discussions regarding surface clearance of OE for the proposed Eastern Bypass and based on the Department's review of the *Final Report for OE Surface Clearance for Construction Support at the Eastern Bypass*, the Department concurs with the level of effort and overall findings presented by Fort McClellan in the subject document.

Below is a summary of the subsurface removal activities and findings related to the proposed Eastern By-Pass, as outlined in the subject document:

- EOD Technology Inc. (EODT) mobilized a small workforce to Range 16, and performed clearance of the most prevalent subsurface anomalies for two weeks.
- A larger scale OE clearance was performed by EODT from 13 October 1999 through 15 March 2001. EODT completed the clearance throughout 1,478 established grids.
- The project began as a 70-acre OE surface clearance but was ultimately expanded to address more than 3000 acres of UXO subsurface clearance to a depth of 1-foot below ground surface.
- A total of 1,046 live OE items were detonated in place. In addition to the live items, EODT recovered 38,700 inert items and 69,984 pounds of ordnance related scrap (ORS). A total of 366,802 anomalies were investigated by excavation.



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- Due to funding and contractual limitations, EODT was unable to complete the project because of significant UXO and target scrap contamination. Upon approval from the U.S. Army Engineering and Support Center, Huntsville (CEHNC), all remaining demolition material and Government Furnished Equipment (GFE) were transferred to Foster Wheeler, another on-site government UXO contractor. Thus, most of the OE clearance actions will be completed by Foster Wheeler. The removal action will include clearance to depth. The results of the cleanup of OE/UXO from Foster Wheeler will be presented in another report.

The Department also agrees with the recommendations outlined in Section 9 of the subject report. Fort McClellan's recommendations suggest that: 1.) an active metal detector such as the EM-61 should be used in areas heavily contaminated with non-UXO scrap (i.e., small ferrous items); and 2.) a non-electric shock tube firing system called "non-el" should be used when several pieces of ordnance require blow in place (BIP) destruction procedures.

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.

Sincerely,



Stephen A. Cobb, Chief
Hazardous Waste Branch
Land Division

SAC/ps

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Dan Copeland/ CEHNC-OE-DC, Huntsville
Mr. Ellis Pope/USA COE, Mobile District
Mr. Jim Grassiano/ADEM

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