

4.0 Development and Detailed Analysis of Remedial Alternatives

4.1 Development of Remedial Alternatives

In this chapter, the remedial technologies and associated process options that were carried forward from the initial screening are used to form remedial alternatives for the Parcel 66(7) residuum groundwater. These alternatives are carried through the detailed analysis of alternatives included in Section 4.2. The remedial alternatives to be considered for detailed analysis include the following:

- Alternative 1 - No Action
- Alternative 2 - Land-Use Controls
- Alternative 3 - In Situ Chemical Oxidation using Potassium Permanganate and Groundwater Monitoring

4.1.1 Alternative 1 – No Action

As recommended by the NCP, the no-action alternative is intended to serve as a baseline for comparison with the other alternatives. This alternative would leave the contaminated groundwater in place with no controls to prevent human or ecological exposure. No remedial actions would be undertaken as part of this alternative to contain, remove, monitor, or treat the contaminated groundwater at Parcel 66(7).

4.1.2 Alternative 2 – Land-Use Controls

This alternative, which would not provide treatment of the contaminated groundwater, involves the implementation, documentation, and management of LUCs at Parcel 66(7). Establishment and implementation of the LUCs at the site would be based on the *Department of Defense Guidance on Land Use Controls Associated with Environmental Restoration Activities for Property Planned for Transfer Out of Federal Control* (DOD, 2001). LUCs include physical, legal, or administrative mechanisms that place restrictions on the use of, or limits access to, real property to prevent exposure to contaminants above permissible levels. The groundwater monitoring schedule would be based on the sampling required to ensure that the groundwater plume at Parcel 66(7) has not migrated beyond the boundaries of the site. The intent of the LUCs remedial alternative is to reduce the risk to human health and the environment by restricting land use and monitoring the concentrations of the COCs in the groundwater.

1 **4.1.2.1 Land-Use Controls (Physical, Legal, and Administrative Mechanisms)**

2 The following is a description of the DOD process for implementing, documenting, and
3 managing LUCs for property such as Parcel 66(7) designated for transfer from DOD to
4 nonfederal entities. Prior to property transfer, the following actions would require completion:
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- 6 • **Consideration of Land Use Controls** – LUCs would be developed that are
7 most effective to protect human health and the environment and to facilitate reuse
8 of the property. For BRAC property such as Parcel 66(7), the Local
9 Redevelopment Authority land use plan would provide the basis for the
10 implementation of the LUCs. Parcel 66(7) has been designated for industrial
11 reuse; therefore, the LUCs established at the site would be consistent with that
12 land use.
13
- 14 • **Finding of Suitability to Transfer (FOST)** – After defining the LUC, the
15 USACE would provide a description of the LUC, the rationale for the LUC, and
16 the description and location of the affected property. The information would be
17 included in the FOST document or in a functionally equivalent document. The
18 FOST would include detailed information about the LUC that would be
19 incorporated into the deed and would serve as the bridge between the
20 environmental process and the real estate process.
21
- 22 • **Implementation of Land-Use Controls** – The implementation of LUCs
23 would be completed in compliance with local, state, federal, and DOD-specific
24 laws and policies. To clearly delineate the responsibilities of all parties involved
25 in the implementation of the LUCs, a LUC implementation plan (LUCIP) would
26 be developed. The LUCIP would explain in detail how the LUCs would be
27 established and documented and would define who would be responsible for their
28 maintenance and management. The LUCIP would be included in the property
29 transfer documents and specifically include the following: a description of the site
30 subject to the LUC, an explanation of the LUC (e.g., restrictions on groundwater
31 use), specification of the duration of the LUC and frequency of inspections, and a
32 reference to the location of the pertinent LUC records.
33

34 After the LUCs have been detailed in the FOST and an LUCIP has been established, the property
35 would be ready for transfer. Concurrent with property transfer, the following actions would
36 require completion:
37

- 38 • **Deed Restrictions/Transfer Agreements** – The LUCs will be incorporated
39 into the deed as restrictions. The deed will also include a reference to the FOST
40 document, appropriate environmental documents (e.g. EBS, RI, and FFS), and a
41 copy of the LUCIP.
42
- 43 • **Recordation of Land-Use Controls** – Recordation of LUCs would be
44 completed in accordance with Alabama real estate and environmental law

1 governing the implementation of land-use restrictions. A copy of the deed with
2 the LUCIP would be provided to applicable local, state, and federal agencies.
3

4 Upon completion of property transfer, the LUCIP would be implemented to ensure adherence to
5 the LUC requirements. The DOD would work with relevant local government agencies and the
6 transferee to ensure adherence to the LUCIP after the property has been transferred. Should the
7 LUCs require modification or termination (i.e., change in land use, or if the RGOs are achieved),
8 or if a deviation from the LUCIP is found, ADEM and EPA shall be issued notification. Post-
9 transfer records management shall include establishment of a central database for tracking the
10 LUCs and retention by USACE of the FOST, LUCIP, deed copies, and applicable environmental
11 studies.
12

13 LUCs at Parcel 66(7) would be implemented via physical, legal, and administrative mechanisms.
14 LUC physical mechanisms at Parcel 66(7) would include expanding the current fence around the
15 parcel boundary and posting signs to limit access and warn of the risk associated with the
16 groundwater contamination. Legal mechanisms would include deed and zoning restrictions at
17 Parcel 66(7) for restriction of groundwater well installation. Deed and zoning restrictions serve
18 to alert concerned parties of the presence of contaminants in the groundwater. Administrative
19 mechanisms would include internal notices and site inspections to serve as a reminder of the
20 existence of the LUCs; a site approval process to review construction projects and other land-use
21 changes at Parcel 66(7) to ensure the LUCs are followed; training of federal, state, and local
22 government officials regarding the existence and care of the LUCs; regular inspection and
23 maintenance of the LUCs, and maintenance of an LUC database and reporting to the regulatory
24 agencies, as required (annual certification and report and five-year review).
25

26 LUCs implemented at Parcel 66(7) would ensure that potential receptors (e.g., future resident)
27 are not exposed to the groundwater (through consumption or bathing) by prohibiting the
28 installation of potable water wells. The existing water distribution system at Anniston Water
29 Works located southwest of FTMC would continue to supply potable water to FTMC and the
30 surrounding communities.
31

32 An LUC database would be maintained after implementation of the LUC. The Army would
33 track the selection and management of the LUCs in the Defense Site Environmental Restoration
34 Tracking System. The following information shall be captured in the tracking system: title of the
35 LUC; location/applicable restoration area (e.g., CERCLA, Resource Conservation and Recovery
36 Act); record of the LUC (type of document where the LUC is recorded [e.g., the FOST]); LUC

1 enforcement (e.g., five-year reviews, transferee reporting); in-place date; actual termination date;
2 type of engineering control; type of institutional control; and description of control.

3
4 The USACE would perform annual certification and reporting of the LUCs. As part of the
5 annual certification and reporting process, USACE personnel would conduct quarterly
6 inspections of the LUCs, which would include visual checks to ensure that proper maintenance is
7 taking place. The inspection would include a visual check of physical restriction mechanisms
8 (e.g., fencing and signs) and checks to ensure that no well installations are taking place. The
9 USACE would provide notice of the inspection to ADEM and EPA and provide a description of
10 any deficiencies and the appropriate measures that have been taken to correct the deficiencies.
11 An annual report would be prepared for ADEM and EPA certifying the continuation of the
12 LUCs. As recommended by CERCLA, a five-year review would be completed and documented
13 to review Parcel 66(7) site conditions and the effectiveness of the LUCs in place, to ensure the
14 restrictions are being enforced, and to make a determination to continue, modify, or terminate the
15 LUCs at the site.

16 17 **4.1.2.2 Land-Use Controls (Groundwater Monitoring)**

18 Groundwater monitoring would be conducted to ensure that the groundwater contaminant plume
19 does not migrate horizontally beyond the Parcel 66(7) property boundary or vertically into
20 bedrock. Existing permanent residuum and bedrock wells at Parcel 66(7) would be sampled to
21 monitor the groundwater for VOCs. Groundwater sampling would be conducted in accordance
22 with existing site sampling protocols.

23
24 Sampling and analysis for VOCs would be conducted at all existing residuum monitoring wells
25 (except PPMP-66-MW04) and at bedrock wells PPMP-66-MW08 and PPMP-66-MW12. The
26 sampling frequency would be quarterly for the first two years and annually thereafter. USACE
27 would complete an annual review of the groundwater results to observe COC concentration
28 trends and to ensure that groundwater contamination does not migrate beyond the Parcel 66(7)
29 property boundary or vertically into bedrock. The results of the quarterly and annual
30 groundwater sampling would be provided to ADEM and EPA.

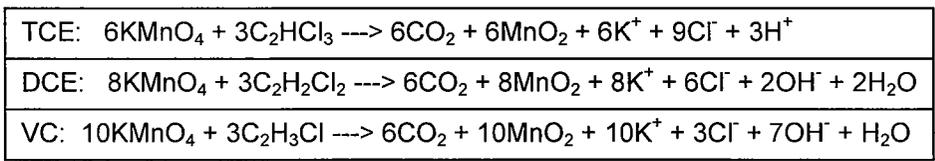
31 32 **4.1.3 Alternative 3 – In Situ Chemical Oxidation Using Potassium Permanganate** 33 **and Groundwater Monitoring**

34 Alternative 3 entails the use of pneumatic fracturing and in situ chemical oxidation using
35 potassium permanganate (KMnO₄) to achieve the RGOs for the COCs in the residuum water-
36 bearing zone at Parcel 66(7). Pneumatic fracturing would be conducted in the weathered shale of
37 the residuum water-bearing zone, followed immediately by a KMnO₄ injection. A KMnO₄

1 slurry (1 pound [lb] of KMnO_4 per gallon of water) would be injected into the residuum water-
 2 bearing zone from a depth of approximately 10 to 30 feet bgs over an area of 8,200 square feet.
 3 The area of the injection comprises the contaminant plume with concentrations of total
 4 chlorinated VOCs greater than or equal to 0.001 mg/L. The KMnO_4 application would be
 5 enhanced with pneumatic fracturing of the weathered shale of the residuum followed by
 6 pressurized/atomized liquid injection of the chemical oxidant. The injected KMnO_4 would react
 7 with the COCs (except 1,2-DCA) in the residuum water-bearing zone, resulting in the formation
 8 of innocuous breakdown products. The chlorinated ethane 1,2-DCA is present in the residuum
 9 groundwater at a concentration below its MCL; therefore, active remediation for this COC is not
 10 required. The entire process of Alternative 3 is described in detail in the following paragraphs.
 11 In preparation for the KMnO_4 injection, an underground injection control (UIC) permit would be
 12 obtained from ADEM. In order to implement in situ chemical oxidation using KMnO_4 , a work
 13 plan and a health and safety plan would also be completed.

14
 15 KMnO_4 is a dark purple, odorless, nonvolatile, granular solid with a metallic luster. It has a
 16 specific gravity of 1.039 and a bulk density of 100 lbs per cubic foot. KMnO_4 forms a visible
 17 (purple) solution, which makes the injection influence or the degree of treatment easy to track.
 18 KMnO_4 is chemically stable in groundwater and stays in solution until it reacts. Pharmaceutical
 19 grade KMnO_4 is recommended for in situ applications because trace metal impurities (e.g.,
 20 arsenic, chromium, nickel, and molybdenum) are at nondetectable levels as compared to metal
 21 concentrations typically present in technical grade KMnO_4 .

22
 23 The permanganate ion (MnO_4^-) in KMnO_4 oxidizes a wide range of common organic compounds
 24 relatively quickly and completely. In particular, MnO_4^- reacts rapidly with the double bonds in
 25 chlorinated ethenes, such as the chlorinated ethene COCs identified at Parcel 66(7) (i.e., TCE,
 26 DCE isomers, and VC). The products of the chemical reactions are innocuous breakdown
 27 products, including carbon dioxide, manganese dioxide, potassium ion, and chloride ion. The
 28 balanced chemical equations for KMnO_4 oxidation of chlorinated ethenes are as follows:



29
 30
 31 As can be seen from these equations, the lower the degree of chlorination, the more KMnO_4 is
 32 required to oxidize the chlorinated ethene. However, the lower the degree of chlorination, the
 33 faster the reaction rate between KMnO_4 and the chlorinated ethenes (Yan and Schwartz, 2000).

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In addition to reacting with the chlorinated ethene COCs at Parcel 66(7), KMnO_4 will also oxidize organic matter and chemically reduced metal species in the aquifer soil matrix. The KMnO_4 demand required to oxidize the soil matrix (i.e., organic matter and other oxidizable species in the soil such as sulfides and reduced metal species) is called the soil oxidant demand (SOD). SOD was measured through laboratory testing of a soil sample collected from the residuum water-bearing zone at Parcel 66(7). Results of the SOD test indicate a demand of 12 grams of KMnO_4 per kilogram of wet soil (Appendix C). The weathered shale at Parcel 66(7) can best be described as a fractured medium, rather than a porous medium. Therefore, the porosity is attributed primarily to microfractures and not pore space. The SOD test was conducted by completely saturating the soil sample with KMnO_4 . Since the actual field application of KMnO_4 would not result in the complete saturation of the weathered shale, the KMnO_4 demand of the microfractures was estimated to be 25 percent of the SOD calculated for soil through laboratory testing. Calculations of the chemical demand presented in Appendix C indicate a total KMnO_4 requirement of approximately 54,120 lbs.

In situ oxidation is a chemical reaction. The effectiveness of the treatment is a function of three elements: the kinetics of the reactions between the KMnO_4 and the contaminants, the contact between the KMnO_4 and the contaminants, and competitive reactions of KMnO_4 with other oxidizable species in the soil. If the contaminants targeted for chemical oxidation are reactive (e.g., chlorinated ethenes), and if sufficient oxidant has been added to overcome the SOD, the limiting factor to the successful application of in situ oxidation is the transport of the oxidant to the areas of contamination and not the rate of reaction between the KMnO_4 and the contaminants. A uniform distribution of KMnO_4 in the subsurface is essential to achieving the RGOs. Residual KMnO_4 will physically stain the soil and groundwater until such time that groundwater carries sufficient chemical reductants (e.g., dissolved organic carbon) into the affected area or until soil species in the area can react to consume the KMnO_4 . Short-term water quality changes in color, total dissolved solids, metals concentrations, and chloride concentrations are to be expected.

An undesirable side effect of the KMnO_4 injection is the oxidation of select metals present in the natural soil matrix, which could result in mobilization of metals. The most common metals that may potentially be oxidized and mobilized in the presence of KMnO_4 are chromium, selenium, and molybdenum. Under natural conditions, chromium is typically present as the chemically reduced trivalent form, which is immobile. In the presence of KMnO_4 , chromium undergoes chemical oxidation to the mobile hexavalent form. The reaction may result in the temporary increase of chromium concentrations above its MCL. However, the elevated chromium,

1 selenium, or molybdenum concentrations generated from the KMnO_4 treatment would attenuate
2 to pre-injection levels as the oxidative conditions dissipate and the aquifer geochemistry returns
3 to background conditions. Pre- and post-injection monitoring for metals will be conducted to
4 ensure compliance with ARARs.

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6 Injecting the KMnO_4 in solution using injection wells or direct-push rods would be difficult due
7 to the low hydraulic conductivity of the weathered shale at Parcel 66(7). Not only would it be
8 difficult to achieve uniform distribution of the chemical oxidant, but also the duration of the
9 injection would be extended due to anticipated low groundwater flow rates. These factors would
10 reduce the radius of influence of the injection points, thereby requiring a larger number of
11 injection points, which translates into higher capital costs. Therefore, it is recommended that
12 pneumatic fracturing be performed, immediately followed by pressurized liquid atomization
13 injection of the KMnO_4 slurry into the residuum water-bearing zone. Fracturing would enable a
14 uniform distribution of KMnO_4 to be accomplished in shorter duration. The atomized injection
15 would reduce the volume of water required to deliver the KMnO_4 to the subsurface, because the
16 KMnO_4 could be injected as a slurry.

17
18 Pneumatic fracturing is a process whereby a gas is injected into the subsurface at pressures
19 exceeding the natural pressures present in the soil interface (i.e., overburden pressure and
20 cohesive stresses). The fracturing is conducted at flow volumes exceeding the natural
21 permeability of the subsurface, resulting in the propagation of fractures outward from the
22 injection point. Unconsolidated silts and clays typically exhibit fracture propagation distances of
23 20 to 40 feet (ARS Technologies, 2002). During fracturing, the pressure is monitored in the
24 injection points. The pressure-time history curve is typically the best evidence that cohesive
25 bonds within the geologic matrix are broken and fractures are created in the subsurface.

26 Pneumatic fracturing is implemented by lowering a packer system down an open borehole and
27 applying the injection in 2- to 3-foot intervals. Following pneumatic fracturing, the formation
28 settles and the fracture network constricts. Since the cohesive bonds of the geologic matrix are
29 broken, closure of the fractures due to overburden stress will not occur at shallow depths (less
30 than 75 feet bgs) (ARS Technologies, 2002).

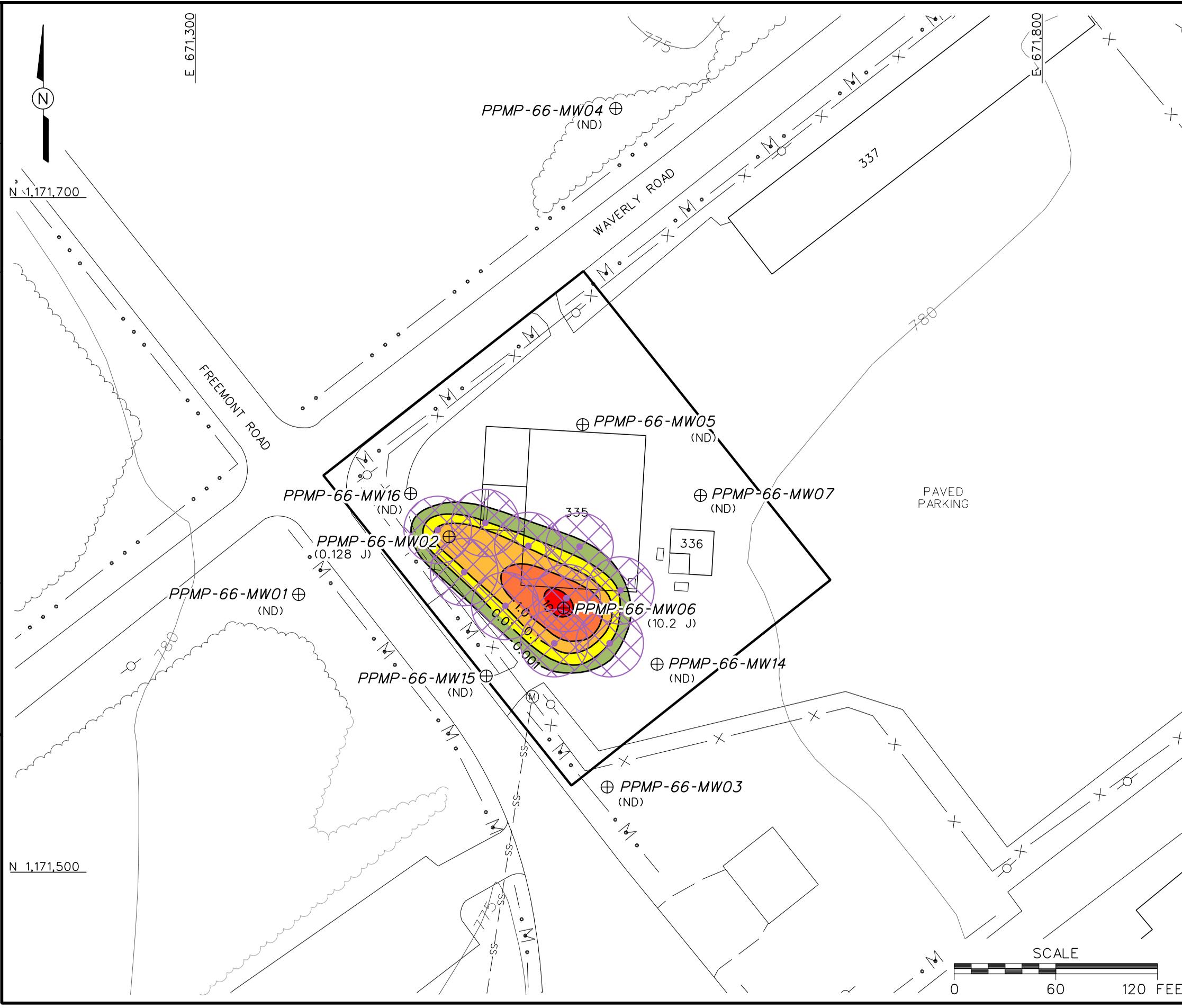
31
32 Once created, the fracture network is capable of transmitting significant amounts of fluid flow.
33 The KMnO_4 would then be injected into the fractures in the form of an atomized slurry. If
34 significant gas-to-slurry ratios are maintained, the slurry will change physical states and
35 transform into a mist within the gas stream. Therefore, fracturing of the weathered shale coupled
36 with atomized injection of the KMnO_4 slurry would increase the injection flow rates and the
37 radius of influence, decrease the injection time, and improve the distribution of the KMnO_4 .

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2 A portion of the contaminant plume at Parcel 66(7) is located beneath the southwest corner of
3 Building 335. Several injection points would have to be placed within Building 335 in order to
4 conduct pneumatic fracturing and atomized injection to treat this portion of the plume. Since
5 Building 335 is in relatively poor condition, pneumatic fracturing would probably compromise
6 the structural integrity of Building 335 because of the resulting upward surface heave during the
7 fracturing process. Because of the potential safety hazards to workers during fracturing activities
8 near the building, Building 335 would be demolished and removed prior to conducting
9 pneumatic fracturing at Parcel 66(7). The demolition of Building 335 would be conducted using
10 conventional construction/demolition equipment. During the course of the demolition, like
11 materials would be segregated prior to off-site disposal. Wood, concrete, and miscellaneous
12 debris would be transported and disposed at a solid waste landfill, and metal debris would be
13 transported to a metal recycling facility.

14
15 Ten injection points will be used to deliver the 54,120 lb of KMnO_4 into the subsurface. The
16 radius of influence of each injection point is estimated to be 20 ft, and the injection rate of the
17 atomized KMnO_4 slurry is estimated to be 25 gallons per minute. The time required for injection
18 of the KMnO_4 slurry, assuming one injection point at a time at 3-foot depth intervals, is
19 estimated to be 18 days. A conceptual layout of the injection points is shown on Figure 4-1.
20 Placement of the injection points was based on treating total chlorinated VOC concentrations
21 within the plume that are greater than or equal to 0.001 mg/L and assuming an estimated radius
22 of influence of 20 feet.

23
24 During the injection process, monitoring wells screened in both the residuum and bedrock water-
25 bearing zones will be monitored for KMnO_4 to indicate if the wells are being influenced by the
26 injection. One week following completion of the KMnO_4 injection, monitoring wells screened in
27 the residuum water-bearing zone will be sampled for VOCs to monitor the decrease in the COC
28 concentrations. Additional sampling for VOCs in select monitoring wells will be conducted
29 once a month for the first three months, followed by quarterly monitoring for a period of two
30 years. This sampling schedule is required to verify treatment and monitor for a rebound in the
31 COC concentrations. Detections of COCs above the RGOs may warrant further KMnO_4
32 injections. Four consecutive quarters with COC concentrations below cleanup levels would
33 indicate that the RGOs have been achieved. In addition, groundwater samples from select
34 monitoring wells collected during the sampling events will be analyzed for metals to monitor the
35 long-term effects of the KMnO_4 injection on metals concentrations. As a contingency, a second
36 injection activity would be conducted in the event that cleanup levels are not reached after one
37 year following the initial injection. For cost estimating purposes, the second injection event is

DWG. NO.: \774645es.952
 PROJ. NO.: 774645
 INITIATOR: J. MALINO
 PROJ. MGR.: J. YACOB
 DRAFT. CHK. BY:
 ENGR. CHK. BY: S. MORAN
 DATE LAST REV.:
 DRAWN BY:
 STARTING DATE: 10/01/02
 DRAWN BY: D. BOMAR
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LEGEND	
	UNIMPROVED ROADS AND PARKING
	PAVED ROADS AND PARKING
	BUILDING
	TOPOGRAPHIC CONTOURS (CONTOUR INTERVAL - 5 FOOT)
	TREES / TREELINE
	PARCEL BOUNDARY
	CULVERT WITH HEADWALL
	SURFACE DRAINAGE / CREEK
	MANMADE SURFACE DRAINAGE FEATURE
	FENCE
	UTILITY POLE
	SANITARY SEWER LINE
	MANHOLE
	RESIDUUM MONITORING WELL LOCATION
	TOTAL CHLORINATED VOC CONCENTRATION (mg/L)
	CONCENTRATION IN MILLIGRAMS PER LITER (mg/L)
	NOT DETECTED
	ESTIMATED CONCENTRATION
	LOCATION AND AREA OF INFLUENCE OF POTASSIUM PERMANGANATE INJECTION (20-FOOT RADIUS OF INFLUENCE)

- NOTES:**
- TOTAL CHLORINATED VOC CONCENTRATION EXCLUDES COMMON LABORATORY CONTAMINANTS CHLOROFORM AND METHYLENE CHLORIDE.
 - POTASSIUM PERMANGANATE WOULD BE INJECTED THROUGH BOREHOLES USING PNEUMATIC FRACTURING.
 - TEN INJECTION POINTS ARE REQUIRED TO INJECT POTASSIUM PERMANGANATE THROUGHOUT THE CHLORINATED VOC PLUME.

FIGURE 4-1
POTASSIUM PERMANGANATE
INJECTION POINTS LAYOUT IN THE
RESIDUUM WATER-BEARING ZONE
SMALL WEAPONS REPAIR SHOP
PARCEL 66(7)

U. S. ARMY CORPS OF ENGINEERS
 MOBILE DISTRICT
 FORT McCLELLAN
 CALHOUN COUNTY, ALABAMA
 Contract No. DACA21-96-D-0018



1 scoped at 25 percent of the initial injection. A closeout report summarizing the results of the in
2 situ chemical oxidation implementation will be submitted once the RGOs are achieved to
3 demonstrate compliance with regulatory criteria.
4

5 **4.2 Detailed Analysis of Alternatives**

6 A detailed analysis of alternatives provides a basis for making an informed decision as to which
7 remedial alternative is most appropriate for the site. CERCLA recommends the evaluation of
8 alternatives against nine criteria; however, the “state acceptance” and “community acceptance”
9 criteria will be evaluated in the decision document after comments from the regulatory agencies
10 and the public, as required, have been received on this report. The nine CERCLA evaluation
11 criteria are summarized as follows:
12

- 13 • **Overall Protection of Human Health and the Environment.** This criterion
14 assesses the degree of protection to human health and the environment provided by
15 an alternative. The evaluation should determine if the alternative achieves the
16 RAO and explain how the alternative reduces, eliminates, and/or controls risks
17 posed by each of the potential exposure pathways identified for the site.
18
- 19 • **Compliance with ARARs.** This evaluation criterion is used to determine if an
20 alternative complies with federal and state ARARs and TBC requirements. If an
21 alternative does not comply with ARARs, justification for a waiver should be
22 provided. Under CERCLA, an ARAR may be waived if one of the following
23 conditions is met: (1) the action is a interim action and the ARAR will be met
24 upon project completion, (2) compliance with the ARAR would pose a greater risk
25 to human health and the environment, (3) it is technically impractical to meet the
26 ARAR, (4) the standard performance of an ARAR can be met by an equivalent
27 method, (5) a state ARAR has not been consistently applied, or (6) ARAR
28 compliance would not provide a balance between the protection achieved at one
29 site and the demands on Superfund for other sites.
30
- 31 • **Long-Term Effectiveness and Permanence.** This evaluation criterion
32 evaluates the long-term ability of an alternative to protect human health and the
33 environment after remedial response levels have been achieved. The primary
34 consideration under this criterion is the effectiveness of controls that are necessary
35 to manage the risks posed by treatment residuals or untreated wastes.
36
- 37 • **Reduction of Toxicity, Mobility, and Volume.** This evaluation criterion
38 addresses EPA’s statutory preference for remedial alternatives that (1)
39 permanently reduce the toxicity, mobility, and volume of the compounds of
40 concern and (2) utilize treatment as a principal element. This criterion focuses on
41 the following factors:
42

- The amount of hazardous materials treated or destroyed
- The degree of reduction in toxicity, mobility, and volume of contaminated material
- The degree to which the treatment method will be irreversible
- The characteristics and quantity of residual material that will remain.

- **Short-Term Effectiveness.** This evaluation criterion assesses the potential effects the construction and implementation of the alternative may have on human health and the environment (e.g., what are the risks to worker health and safety). Factors to be evaluated include protection of the workers and the community during the implementation of remedial actions, environmental impacts resulting from the implementation of the remedial actions, and the time required for achieving protection.
- **Implementability.** This evaluation criterion assesses the technical and administrative feasibility of implementing an alternative. Technical feasibility addresses the difficulties and unknowns associated with a technology, the reliability of a technology, the ease of undertaking future remedial actions, and the ability to monitor the effectiveness of the system. Administrative feasibility refers to the activities required to coordinate with regulatory agencies and the availability of equipment and services.
- **Cost.** This criterion evaluates the capital and O&M costs associated with an alternative. Cost estimates typically provide an accuracy of +50 percent to -30 percent. Present worth analysis is used to evaluate expenditures that occur over multiple years (maximum 30 years).
- **State Acceptance.** This evaluation criterion addresses the state's (or lead agency's) concurrence with or potential concerns with the alternative. State acceptance will be addressed once comments have been received from the lead agencies.
- **Community Acceptance.** This evaluation criterion addresses the community's concurrence with or potential concerns with the alternative. Community input regarding the selection of remedial alternatives will be solicited during the public comment period on the proposed plan.

CERCLA recommends that, to the maximum extent practical, the remedial action alternatives must (1) be protective of human health and the environment, (2) attain ARARs, (3) be cost effective, (4) utilize permanent solutions and alternative treatment technologies, and (5) reduce toxicity, mobility, or volume. The Parcel 66(7) remedial action alternatives are individually evaluated against seven criteria in the following sections.

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4.2.1 Alternative 1 – No Action

The evaluation of the no-action alternative with respect to the seven evaluation criteria is presented in the following sections.

4.2.1.1 Overall Protection of Human Health and the Environment

Alternative 1, no action, provides no control of exposure to the contaminated medium and no reduction in the risk to human health and the environment posed by groundwater at Parcel 66(7). The no-action alternative does not actively reduce the COC concentrations in groundwater to the RGOs or eliminate the pathway for exposure to human receptors and, therefore, it does not achieve the RAO for Parcel 66(7). A decrease in the COC concentrations may occur over time through natural processes. However, the reduction of contaminant concentrations in groundwater is anticipated to be minimal based on the results of a natural attenuation evaluation completed for Parcel 66(7).

This alternative does not rely on an active treatment method to reduce COC concentrations to the RGOs or prevent exposure to groundwater. The results of the SRA indicated that, under current conditions, the risk to human health posed by the groundwater would not be realized if the groundwater is not developed as a potable water source. The no-action alternative would not ensure the long-term prevention of groundwater development as a potable water source. Therefore, the no-action alternative would not be effective in protecting human health.

4.2.1.2 Compliance with ARARs

Since no remedial activities are associated with this alternative, compliance with the chemical-specific ARARs for groundwater would not be met. Since no remedial activities would be conducted under this alternative, action-specific and location-specific ARARs would not apply.

4.2.1.3 Long-Term Effectiveness and Permanence

The no-action alternative does not provide for any controls to reduce the potential for human exposure to the COCs or long-term risk management measures for the untreated contaminants. All current and potential future risks would remain the same under this alternative.

4.2.1.4 Reduction of Toxicity, Mobility, and Volume

The implementation of this alternative does not employ any treatment that would reduce the toxicity, mobility, or volume of the COCs in groundwater; therefore, this alternative does not satisfy the statutory preference for treatment. A decrease in the COC concentrations may occur over time through natural processes. However, the reduction of contaminant concentrations in

1 groundwater is anticipated to be minimal based on the results of a natural attenuation evaluation
2 completed for Parcel 66(7).

3 4 **4.2.1.5 Short-Term Effectiveness**

5 Because the no-action alternative does not involve any active remedial measures, no short-term
6 risks to the community, workers or the environment would exist.

7 8 **4.2.1.6 Implementability**

9 This criterion does not apply because no remedial action would be taken as part of this
10 alternative.

11 12 **4.2.1.7 Cost**

13 No capital or O&M costs would be associated with this alternative because no remedial activities
14 would be conducted.

15 16 **4.2.2 Alternative 2 – Land-Use Controls**

17 The evaluation of the LUC alternative with respect to the seven evaluation criteria is presented in
18 the following sections.

19 20 **4.2.2.1 Overall Protection of Human Health and the Environment**

21 The implementation of LUCs as part of this alternative would prevent human exposure to the
22 COCs through physical, legal, and administrative mechanisms and, therefore, would be
23 protective of human health. Physical mechanisms would include fencing and warning signs to
24 warn of groundwater contamination. Legal mechanisms would protect potential current and
25 future human receptors through deed and zoning restrictions on potable water well installation at
26 Parcel 66(7). Groundwater contamination at Parcel 66(7) does not present an unacceptable risk
27 to human health provided that groundwater at the site is not developed as a source of potable
28 water.

29
30 This alternative does not actively reduce the COC concentrations in groundwater to the RGOs.
31 This alternative would, however, eliminate potential contaminant exposure pathways to human
32 receptors through the implementation of the LUCs. Therefore, this alternative would achieve the
33 RAO for Parcel 66(7). Furthermore, none of the COCs in groundwater presents a risk to
34 terrestrial ecosystems at FTMC.

1 **4.2.2.2 Compliance with ARARs**

2
3 **Chemical-Specific ARARs.** This alternative would not achieve the chemical-specific
4 ARARs (Table 2-2) for the COCs that exceed their respective MCLs in groundwater (i.e., 1,1-
5 DCE, cis-1,2-DCE, TCE, and VC).
6

7 **Location-Specific ARARs.** Location-specific ARARs are listed in Table 2-3. Since no
8 remedial action would be associated with this alternative, no location-specific ARARs have been
9 identified.
10

11 **Action-Specific ARARs.** Action-specific ARARs are listed in Table 2-4. Since no remedial
12 action would be associated with this alternative, no action-specific ARARs have been identified.
13

14 **4.2.2.3 Long-Term Effectiveness and Permanence**

15 This alternative does not provide for active treatment to reduce or eliminate groundwater
16 contamination. However, it does provide long-term controls for eliminating potential human
17 exposure to groundwater contaminants through the implementation of LUCs. The maintenance
18 of the LUCs and groundwater monitoring would be required indefinitely, since no significant
19 decrease in groundwater contaminant concentrations is expected over the long term.
20

21 Adequate long-term control would be established as long as the LUCs are maintained as defined
22 in the LUCIP. The long-term effectiveness of the LUCs would depend on the annual and five-
23 year reviews and inspections of the physical mechanisms in place at Parcel 66(7). The
24 effectiveness of the LUCs would also depend on the proper implementation and coordination of
25 activities defined in the LUCIP by the appropriate personnel from USACE, ADEM, EPA, and
26 the property transferee.
27

28 **4.2.2.4 Reduction of Toxicity, Mobility, and Volume**

29 This alternative would not reduce the toxicity, mobility, or volume of contaminants in the
30 groundwater through an active remedial process. A reduction in groundwater contaminant
31 concentrations may occur over time through natural processes; however, this reduction is
32 anticipated to be minimal. Although the migration of the groundwater contaminant plume would
33 be monitored for the duration of the LUCs, no active reduction of contaminant mobility in the
34 groundwater would be accomplished through this alternative.
35

1 **4.2.2.5 Short-Term Effectiveness**

2 No significant short-term risks to human health or the environment would exist during the
3 implementation of this alternative. However, worker exposure to contaminated groundwater is
4 possible during sampling activities associated with the groundwater monitoring events. The
5 short-term risks associated with groundwater monitoring activities may be minimized through
6 the implementation of an effective health and safety program.

7
8 The implementation of the LUCs would prevent exposure to contaminated groundwater by
9 prohibiting the installation of potable water wells at Parcel 66(7). This alternative could provide
10 almost immediate protection because LUCs can be implemented relatively quickly (e.g., within
11 six months).

12
13 **4.2.2.6 Implementability**

14 All components of this alternative are readily implementable. Minimal technical concerns exist
15 that would hinder the implementation of this alternative because no remedial activities would be
16 performed under this alternative. However, routine inspection and maintenance of the LUCs
17 would be required. All services and materials are readily available to conduct the inspection and
18 maintenance of LUCs for this alternative.

19
20 Although administratively implementable, LUCs would require the following: development of
21 the LUCIP; a site approval process to approve land-use changes to ensure the integrity of the
22 LUCs; the installation of markers to identify areas of restricted use; training of appropriate
23 personnel (i.e., property transferee) on the location and care of the LUC property; an internal
24 notice to relevant offices (i.e., ADEM and EPA) of the existence of the LUCs; and maintenance
25 of a LUC database by applicable local, state, and/or federal agencies.

26
27 **4.2.2.7 Cost**

28 The detailed costs associated with implementation of LUCs at Parcel 66(7) are presented in
29 Table 4-1. The capital cost for this alternative is estimated to be \$109,847. The capital cost
30 includes the development of the LUCIP and FOST documents, the site-specific health and safety
31 plan, the field sampling plan, and the quality assurance project plan. Capital costs also include
32 installation of fencing and warning signs. For the purpose of this FFS, O&M costs were based
33 on a 30-year time period. However, in actuality, LUCs would require maintenance as long as
34 groundwater contamination exists above the RGOs, which is expected to exceed the 30-year time
35 period. O&M costs include groundwater monitoring, reporting, meetings, and reviews. The
36 total net present worth cost (capital cost plus O&M present worth cost plus contingency) for this
37 alternative is \$529,100, based on a LUC maintenance period of 30 years.

Table 4-1

**Cost Estimate for Alternative 2 - Land Use Controls
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

(Page 1 of 3)

Alternative 2 Land Use Controls (LUCs)		Parcel 66(7) Ft. McClellan		
Scope:				
1. Generation of the Land Use Control Implementation Plan (LUCIP) and Finding of Suitability to Transfer (FOST) Document.				
2. Completion of the Health and Safety Plan, Field Sampling Plan, and the Quality Assurance Project Plan.				
3. Fencing and Warning Sign Installation.				
4. Groundwater Monitoring.				
5. LUC Meetings, Inspections, Annual Certification, Database Management, Maintenance and 5-Year Reviews.				
6. Cost Summary (all present worth calculations assume a discount rate of 7%).				
1.0 Generation of the Land Use Control Implementation Plan (LUCIP) and Finding of Suitability to Transfer (FOST) Document				
Includes:				
1. Completion of the site-specific LUCIP and the FOST document.				
Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Paralegal	60	\$100.00	/hr.	\$6,000.00
Attorney	60	\$150.00	/hr.	\$9,000.00
Capital Cost Subtotal				\$15,000
2.0 Plan Writing				
Includes:				
1. Completion of the Health and Safety Plan, Field Sampling Plan, and the Quality Assurance Project Plan.				
Service/Materials	No. Units	Unit Cost	Unit	Cost
Health and Safety Plan	1	\$7,500.00	ls	\$7,500.00
Field Sampling Plan	1	\$7,500.00	ls	\$7,500.00
Quality Assurance Project Plan	1	\$5,000.00	ls	\$5,000.00
Capital Cost Subtotal				\$20,000
3.0 Fencing and Warning Sign Installation				
Includes:				
1. Expansion of existing fenceline to border the property boundary and signs (costs include labor).				
2. Unit Cost of Fenceline from <i>RSMMeans, Environmental Remediation Cost Data - Unit Price</i> 6th Annual Edition, 2000 adjusted to present day (2002) with a 3% inflation rate.				
3. Unit Cost of Warning Signs from <i>www.McMaster-Carr.com</i> .				
Service/Materials	No. Units	Unit Cost	Unit	Cost
6' high fenceline expansion	400	\$21.59	/ft.	\$8,635.73
Aluminum custom warning signs	10	\$33.90	/ea.	\$339.00
Capital Cost Subtotal				\$8,975

Table 4-1

**Cost Estimate for Alternative 2 - Land Use Controls
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

(Page 2 of 3)

4.0 Groundwater Monitoring

Includes:

1. Sampling and analysis for VOCs in 9 residuum monitoring wells and 2 bedrock monitoring wells quarterly for first two years and annually thereafter up to 30 years.
2. Contractor field crew consists of two field technicians; 2 wells/day (48 hours/tech/event).
3. Office labor for data validation, management, and results evaluation.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	12	\$100.00	/hr.	\$1,200.00
Field Technician (H-4)	48	\$35.00	/hr.	\$1,680.00
Field Technician (H-4)	48	\$35.00	/hr.	\$1,680.00
Project Chemist (E-6)	24	\$50.00	/hr.	\$1,200.00
Geologist (E-8)	12	\$58.00	/hr.	\$696.00
Equipment and Materials:				
PID	6	\$50.00	/day	\$300.00
DO, ORP, pH, and turbidity meter	6	\$70.00	/day	\$420.00
PPE	6	\$24.00	/day	\$144.00
Water level indicator	6	\$14.00	/day	\$84.00
Submersible pump and control box	6	\$90.00	/day	\$540.00
Generator (120 V)	6	\$30.00	/day	\$180.00
Consumable Supplies	1	\$750.00	ls	\$750.00
Analytical:				
VOCs - EPA 8260B	15	\$150.00	/ea.	\$2,250.00
Shipping	1	\$50.00	/ea.	\$50.00
Contractor Travel:				
Vehicle (4WD)	6	\$33.00	/day	\$198.00
Per Diem	12	\$30.00	/day	\$360.00
Lodging	12	\$55.00	/day	\$660.00
Total Cost Per Sampling Event:				\$12,392.00
1st Year Sampling Events (4 events):				\$49,568.00
Present Worth of 2nd Year Sampling Events (4 events):				\$46,326.25
Present Worth of 3rd to 30th Year Sampling Events (1 annual event):				\$129,740.52

Capital Cost Subtotal	\$49,568
Present Worth O&M Subtotal	\$176,067

Table 4-1

**Cost Estimate for Alternative 2 - Land Use Controls
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

(Page 3 of 3)

5.0 LUC Meetings, Inspections, Annual Certification, Database Management, Maintenance and 5-Year Reviews

Includes:

1. Quarterly meeting for the first two years and annual for the 3rd to 30th year to ensure the Land Use is consistent with the LUCs.
2. Quarterly LUC inspection.
3. 5 -year review, notice to EPA and ADEM, meeting, and review documentation.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor (Land Use Meeting):				
Project Manager (E-12)	4	\$100.00	/hr	\$400.00
Project Engineer (E-8)	8	\$62.00	/hr	\$496.00
Total Cost Per Land Use Meeting:				\$896.00
1st Year Quarterly Land Use Meetings:				\$3,584.00
Present Worth of 2nd Year Quarterly Land Use Meetings:				\$3,349.61
Present Worth of 3rd to 30th Year Annual Land Use Meetings:				\$9,380.85
Contractor Labor (Quarterly inspection):				
Project Manager (E-12)	4	\$100.00	/hr	\$400.00
Field Technician (H-4)	8	\$35.00	/hr.	\$280.00
Total Cost Per Quarterly Inspection:				\$680.00
1st Year of Quarterly LUC Inspection:				\$2,720.00
Present Worth of Year 2 to Year 30 of Quarterly LUC Inspections:				\$33,395.34

Annual Certification, DSERTS database management and LUC Maintenance:				
Annual Certification and DSERTS				
Database Management:	1	\$5,000.00	ls	\$5,000.00
LUC Maintenance	1	\$5,000.00	ls	\$5,000.00
1st Year of Annual Certification, DSERTS database management and LUC Maintenance:				\$10,000.00
Present Worth of Year 2 to Year 30 of Annual Certification, DSERTS database management and LUC Maintenance:				\$122,777.00
Contractor Labor (5-year review):				
Project Manager (E-12)	8	\$100.00	/hr	\$800.00
Project Engineer (E-8)	24	\$62.00	/hr	\$1,488.00
Total Cost Per 5-Year Review:				\$2,288.00
Present Worth of 30 Years of 5-Year Reviews:				\$5,282.53

Capital Cost Subtotal	\$16,304
Present Worth O&M Subtotal	\$174,185

6.0 Cost Summary

Base Capital Cost	\$109,847
Present Worth O&M Costs	\$350,252
Total Contingency (15%)	\$69,015
Total Present Worth Cost	\$529,100

1
2 **4.2.3 Alternative 3 – In Situ Chemical Oxidation Using Potassium Permanganate**
3 **and Groundwater Monitoring**

4 The evaluation of this alternative with respect to the seven evaluation criteria is presented in the
5 following sections.
6

7 **4.2.3.1 Overall Protection of Human Health and the Environment**

8 This alternative would reduce the COC concentrations in groundwater to their respective RGOs
9 through in situ chemical oxidation using KMnO_4 and, therefore, would be protective of human
10 health and the environment. In situ chemical oxidation using KMnO_4 has been demonstrated
11 through many pilot-scale and full-scale applications to achieve complete destruction of
12 chlorinated ethenes in groundwater. Since this alternative would actively reduce the COC
13 concentrations in groundwater to the RGOs through treatment, the groundwater remaining after
14 treatment would no longer pose an unacceptable potential risk to human health. Therefore, this
15 alternative would achieve the RAO for Parcel 66(7).
16

17 **4.2.3.2 Compliance with ARARs**

18 This alternative will comply with the chemical-, location-, and action-specific ARARs. The
19 KMnO_4 will react with the COCs at Parcel 66(7), resulting in the formation of innocuous
20 breakdown products and the reduction of COC concentrations to the RGOs. Post-injection
21 monitoring for VOCs will be conducted to verify long-term treatment effectiveness. A UIC
22 permit will be obtained prior to the KMnO_4 injection in order to comply with ADEM regulations.
23

24 Injection of KMnO_4 may mobilize some metals due to the creation of a highly oxidized
25 environment. The mobilization of metals may result in the temporary increase of metal
26 concentrations above MCLs. Elevated metals concentrations generated from the
27 KMnO_4 treatment typically attenuate to pre-injection levels as the oxidative conditions dissipate
28 and the aquifer geochemistry returns to background conditions. Pre-injection and post-injection
29 monitoring for metals will be conducted to ensure compliance with chemical-specific ARARs.
30

31 **4.2.3.3 Long-Term Effectiveness and Permanence**

32 The application of pneumatic fracturing followed by in situ chemical oxidation using KMnO_4
33 will significantly and permanently decrease the concentrations of the chlorinated ethenes at
34 Parcel 66(7) to the RGOs. Numerous pilot-scale and full-scale KMnO_4 applications have been
35 proven successful at treating chlorinated ethenes such as the COCs (except 1,2-DCA) detected in
36 the residuum water-bearing zone at Parcel 66(7). Implementation of this alternative will result in
37 the immediate decrease in the concentrations of chlorinated ethenes. Post-injection monitoring

1 for VOCs will be conducted to verify treatment. As a contingency, a second injection activity
2 may be conducted in the event that cleanup levels are not reached by one year after the initial
3 injection. Reduction of the chlorinated ethene concentrations to the RGOs would allow the
4 Army to release Parcel 66(7) to the public domain for unrestricted reuse (i.e., LUCs would not be
5 required).

6 7 **4.2.3.4 Reduction of Toxicity, Mobility, and Volume**

8 Implementation of pneumatic fracturing followed by in situ chemical oxidation using KMnO_4
9 will permanently reduce the toxicity, mobility, and volume of the chlorinated ethene COCs
10 through the irreversible oxidation of these chemicals to innocuous breakdown products.
11 Therefore, this alternative satisfies EPA's statutory preference for remedial actions that
12 permanently reduce the toxicity, mobility, and volume of the COCs and utilize treatment as a
13 principal element.

14 15 **4.2.3.5 Short-Term Effectiveness**

16 This alternative would involve potential short-term risks to workers associated with general
17 construction activities and potential exposure to the KMnO_4 . Subsurface pneumatic fracturing
18 and building demolition activities would require operation of heavy equipment that would
19 increase the risk to remediation workers. Other risks to workers include those generally
20 associated with construction activities (e.g., slips, trips, and falls). KMnO_4 also poses a risk to
21 remediation personnel because it is a strong oxidant and may cause damage to the eyes, skin, and
22 the respiratory tract.

23
24 The implementation of proper engineering controls and safety equipment would minimize the
25 potential short-term risks to the community or to remediation personnel conducting building
26 demolition, pneumatic fracturing, and KMnO_4 injection activities. Measures would be taken to
27 prevent the inhalation of KMnO_4 particulates during the mixing and injection processes. The
28 injection of KMnO_4 would be limited to contaminated areas, and measures would be taken to
29 ensure that the KMnO_4 slurry does not reach the surface. Remediation workers would be
30 equipped with the necessary personal protective equipment and would conform to the site health
31 and safety program. A site-specific health and safety plan, including hazard analyses for
32 pneumatic fracturing and in situ chemical oxidation using KMnO_4 , would be prepared prior to
33 implementing this alternative.

34
35 The estimated time to achieve groundwater RGOs is 12 to 24 months. This alternative includes
36 preparation of a final design work plan and site-specific safety and health plan, obtaining a UIC
37 permit, procurement, mobilization, building demolition, equipment rentals, borehole drilling,

1 pneumatic fracturing, KMnO₄ injection, groundwater monitoring for a total of three years after
2 the initial injection, data evaluation, and generation of a closeout report.

3 4 **4.2.3.6 Implementability**

5 This alternative is technically and administratively implementable. The chemicals and
6 equipment required for this remedial alternative are readily available. The injection approach
7 has been repeatedly field tested in similar lithologies and is not expected to pose any difficulties.
8 In situ chemical oxidation using KMnO₄ has been demonstrated in many field-scale applications
9 to be capable of achieving complete destruction of chlorinated ethenes.

10
11 The efficiency of treatment is limited only by the success of the delivery system in bringing the
12 oxidant into contact with the chlorinated ethenes. Pneumatic fracturing and atomized liquid
13 injection will enhance the distribution of the KMnO₄ slurry at Parcel 66(7). Post-injection
14 monitoring for VOCs will be conducted to verify treatment. As a contingency, a second
15 injection activity may be conducted in the event that cleanup levels are not reached after one year
16 following the initial injection.

17 18 **4.2.3.7 Cost**

19 The detailed cost estimate associated with implementing this alternative at Parcel 66(7) is
20 presented in Table 4-2. Additional backup cost information associated with KMnO₄ material,
21 KMnO₄ injection (including pneumatic fracturing), and Building 335 demolition is included in
22 Appendix C. The capital cost of this alternative is estimated to be \$805,675. The capital cost
23 includes preparing the final design work plan, developing the site-specific safety and health plan,
24 Building 335 demolition, obtaining a UIC permit, procurement, mobilization, chemical costs,
25 equipment rentals, borehole drilling, pneumatic fracturing, KMnO₄ injection, and post-injection
26 monitoring for one year. O&M costs include groundwater monitoring for two years, reporting,
27 and a second permanganate injection. The total net present worth cost (capital cost plus O&M
28 present worth cost plus contingency) is \$1,200,700.

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

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**Alternative 3
In Situ Chemical Oxidation using Potassium
Permanganate and Groundwater Monitoring**

Parcel 66(7)
Ft. McClellan

Scope:

1. Generate pneumatic fracturing and in situ chemical oxidation work plan, H&S plan, and materials list.
2. Conduct baseline sampling and analysis.
3. Procure drilling subcontractor, fracturing subcontractor, and KMnO₄.
4. Generate plans and permits, mobilization and demobilization of equipment and personnel, and perform Bldg. 335 demolition.
5. Mobilize and setup equipment, personnel, KMnO₄, and subcontractors for in situ chemical oxidation activities.
6. Drill ten (10) 5-inch diameter injection boreholes.
7. Initiate fracturing and injection activities.
8. Post-injection sampling and analysis.
9. Demobilize equipment and personnel for permanganate injection.
10. Second permanganate injection.
11. Reporting.
12. Cost Summary (all present worth calculations assume a discount rate of 7%).

1.0 Work Plan, Health and Safety Plan, and Materials List for Fracturing/Permanganate Injection

Includes:

1. Labor to generate work plan, eng. specifications, and Health and Safety Plan as needed.
2. Generate materials list.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	16	\$100.00	/hr.	\$1,600.00
Senior Engineer (E-12)	40	\$97.00	/hr.	\$3,880.00
Task Manager (E-8)	40	\$62.00	/hr.	\$2,480.00
Project Engineer (E-8)	120	\$62.00	/hr.	\$7,440.00
Geologist (E-8)	60	\$58.00	/hr.	\$3,480.00
Health and Safety Specialist (E-5)	40	\$33.00	/hr.	\$1,320.00
Drafting (E-6)	30	\$40.00	/hr.	\$1,200.00
Document Reproduction (Draft and Final)	2	\$1,000.00	/ea.	\$2,000.00
Fracturing and Injection Subcontractor:				
Fracturing Work Plan and Assessment	1	\$12,500.00	ls	\$12,500.00
Capital Cost Subtotal				\$35,900

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

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2.0 Baseline Sampling and Analysis

Includes:

1. Monitoring of groundwater quality parameters in the field (ORP, pH, turbidity).
2. Sampling and analysis for VOCs using EPA Method 8260B in 14 monitoring wells.
3. Sampling and analysis for Metals using EPA Method 6010B in 14 monitoring wells.
4. Sampling and analysis for Chloride using EPA Method 300 in 14 monitoring wells.
5. Contractor field crew consists of two field technicians; 2 wells/day, total of 7 days.
6. Office labor for data validation and management.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	16	\$100.00	/hr.	\$1,600.00
Field Technician (H-4)	56	\$35.00	/hr.	\$1,960.00
Field Technician (H-4)	56	\$35.00	/hr.	\$1,960.00
Project Chemist (E-6)	30	\$50.00	/hr.	\$1,500.00
Geologist (E-8)	15	\$58.00	/hr.	\$870.00
Equipment and Materials:				
PID	7	\$50.00	/day	\$350.00
DO, ORP, pH, and turbidity meter	7	\$70.00	/day	\$490.00
PPE	7	\$24.00	/day	\$168.00
Water level indicator	7	\$14.00	/day	\$98.00
Submersible pump and control box	7	\$90.00	/day	\$630.00
Generator (120 V)	7	\$30.00	/day	\$210.00
Consumable Supplies	1	\$750.00	ls	\$750.00
Analytical:				
VOCs - EPA 8260B	18	\$150.00	/ea.	\$2,700.00
Metals - EPA 6010B	18	\$250.00	/ea.	\$4,500.00
Chloride - EPA 300	18	\$50.00	/ea.	\$900.00
Shipping	2	\$50.00	/ea.	\$100.00
Contractor Travel:				
Vehicle (4WD)	7	\$33.00	/day	\$231.00
Per Diem	14	\$30.00	/day	\$420.00
Lodging	14	\$55.00	/day	\$770.00
Capital Cost Subtotal				\$20,207

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

(Page 3 of 8)

3.0 Procurement

Includes:

1. Procure Drilling Subcontractor.
2. Procure Fracturing and Injection Subcontractor.
3. Procure 54,120 lbs of KMnO₄.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	8	\$100.00	/hr.	\$800.00
Project Engineer (E-8)	30	\$62.00	/hr.	\$1,860.00
Procurement	40	\$32.00	/hr.	\$1,280.00

Capital Cost Subtotal \$3,940

4.0 Building Demolition

Includes:

1. Completion of building demolition work plan, H&S plan, and associated permits.
2. Mobilization of demolition equipment and personnel.
3. Demolition of the building and transportation and disposal of waste as non-hazardous.
4. Demobilization of demolition equipment and personnel.
5. Site support equipment and personnel.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Work Plan Completion	1	\$8,651.00	ls	\$8,651.00
Health & Safety Plan Completion	1	\$6,658.00	ls	\$6,658.00
Permit Completion	1	\$5,542.00	ls	\$5,542.00
Mobilization of Equipment	1	\$2,331.00	ls	\$2,331.00
Setup Prior to Demolition	1	\$2,300.00	ls	\$2,300.00
Mobilization of Personnel	1	\$2,546.00	ls	\$2,546.00
Removal of Interior Piping & Equipment	1	\$24,304.00	ls	\$24,304.00
Demolition of Top 20ft. Of Building	1	\$54,254.00	ls	\$54,254.00
Demolition of Block Wall to Grade	1	\$78,213.00	ls	\$78,213.00
Demobilization of Equipment	1	\$2,331.00	ls	\$2,331.00
Demobilization of Personnel	1	\$2,546.00	ls	\$2,546.00
Site Support	1	\$29,276.00	ls	\$29,276.00
Oversight Support	1	\$30,723.00	ls	\$30,723.00

Capital Cost Subtotal \$249,675

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

(Page 4 of 8)

5.0 Fracturing/Injection Mobilization and Setup

Includes:

1. Mobilization of contractor personnel.
2. Mobilization of drilling subcontractor.
3. Mobilization of fracturing and injection subcontractor.
4. Mobilization of materials and equipment.
5. Mobilization and setup time is estimated at 3 days.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	8	\$100.00	/hr.	\$800.00
Project Engineer (E-8)	30	\$62.00	/hr.	\$1,860.00
Geologist (E-8)	30	\$58.00	/hr.	\$1,740.00
Field Technician (H-4)	30	\$35.00	/hr.	\$1,050.00
Drilling Subcontractor:				
Mobilization and Setup	1	\$2,500.00	ls	\$2,500.00
Fracturing and Injection Subcontractor:				
Mobilization and Setup	1	\$10,500.00	ls	\$10,500.00
Materials and Equipment:				
USP KMnO ₄ chemical cost	54,120	\$1.59	/lb	\$86,050.80
Water	54	\$10.00	00 gallons	\$541.20
Secondary containment and pump	1	\$1,000.00	/ea.	\$1,000.00
50kw Electric generator	3	\$300	/wk	\$900.00
Generator fuel (Diesel)	100	\$1.50	/gal	\$150.00
Forklift	3	\$500	/wk	\$1,500.00
Safety Gear (baricades)	10	\$25.00	/ea.	\$250.00
PPE	16	\$24.00	/day	\$384.00
Water level indicator	3	\$60.00	/wk	\$180.00
PID	3	\$200.00	/wk	\$600.00
DO, ORP, pH, and turbidity meter	3	\$275.00	/wk	\$825.00
Colorimetric Analyzer	3	\$100.00	/wk	\$300.00
Quenching supplies (peroxide and vinegar)	100	\$5.00	/gal	\$500.00
Miscellaneous supplies	1	\$1,000.00	ls	\$1,000.00
IDW Rolloff Box (mobe/demobe, rental)	1	\$1,500.00	ls	\$1,500.00
Contractor Travel:				
Vehicle (4WD)	3	\$33.00	/day	\$99.00
Roundtrip Airfare (3 personnel)	3	\$800.00	/ea	\$2,400.00
Per Diem (3 personnel)	9	\$30.00	/day	\$270.00
Lodging (3 personnel)	9	\$55.00	/day	\$495.00

Capital Cost Subtotal

\$117,395

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

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6.0 Injection Points Drilling

Includes:

1. Drilling of ten (10) 5-inch boreholes to a depth of 32-ft bgs (total of 320 feet).
2. Assume drilling of three boreholes per day.
3. Total field time is 4 days.
4. Contractor geologist will be onsite for oversight.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	4	\$100.00	/hr.	\$400.00
Geologist (E-8)	40	\$58.00	/hr	\$2,320.00
Drilling Subcontractor:				
Borehole Drilling	320	\$50.00	/ft	\$16,000.00
Contractor Travel:				
Vehicle (4WD)	4	\$33.00	/day	\$132.00
Per Diem	4	\$30.00	/day	\$120.00
Lodging	4	\$55.00	/day	\$220.00
Capital Cost Subtotal				\$19,192

7.0 Fracturing and Injection Activities

Includes:

1. Daily monitoring of KMnO₄ mixing system (system runtime, changing drums).
2. Daily monitoring of KMnO₄ delivery system (manifold, hoses, injection points).
3. Monitoring of subsurface parameters in select monitoring wells (ORP, water levels, KMnO₄).
4. Maintenance of test activity log and tracking amount injected.
5. Injection of KMnO₄ slurry according to designed injection sequence.
6. The KMnO₄ slurry will be injected into one injection point at a time, at 3-foot intervals, starting at 10-ft and extending to a maximum depth of 30-ft bgs (depending on refusal). The estimated injection rate is 25 gallons per minute. The estimated field time is 18 days.
7. Contractor Personnel On-Site: Field engineer (100%), geologist, technician (100%), and site superintendent (25% of time).
8. Off-Site Support: Task Manager and Senior Engineer at 10% and Project Manager at 5%.
9. Assume 12-hour field days to allow for setup, maintenance, and shut-down.
10. Total hours in the field: 18 days x 12 hours/day = -----> 216 hrs.
12. All equipment, rentals, and materials included under system set-up.
13. Airfare included under mobilization.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	16	\$100.00	/hr.	\$1,600.00
Task Manager (E-8)	24	\$62.00	/hr.	\$1,488.00
Senior Engineer (E-12)	24	\$97.00	/hr.	\$2,328.00
Project Engineer (E-8)	216	\$62.00	/hr.	\$13,392.00
Geologist (E-8)	216	\$58.00	/hr.	\$12,528.00
Field Technician (H-4)	216	\$35.00	/hr.	\$7,560.00
Site Superintendent (E-8)	54	\$60.00	/hr.	\$3,240.00
Fracturing and Injection Subcontractor:				
Field Injection Implementation	1	\$199,000.00	ls	\$199,000.00

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

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7.0 Fracturing and Injection Activities (continued)

Contractor Travel:

Vehicle (4WD)	18	\$33.00	/day	\$594.00
Per Diem (3 personnel)	54	\$30.00	/ea.	\$1,620.00
Lodging (3 personnel)	54	\$55.00	/ea.	\$2,970.00

Capital Cost Subtotal \$246,320

8.0 Post-Injection Sampling and Analysis

Includes:

1. Sampling and analysis for VOCs, Chloride, and Metals in 14 monitoring wells one week post-injection, monthly for 3 months, followed by quarterly sampling for two years.
2. Total number of sampling events is 12.
3. Monitoring of groundwater quality parameters (ORP, pH, turbidity, conductivity, temperature).
4. Contractor field crew consists of two field technicians; 2 wells/day (56 hours/tech/event).
5. Office labor for data validation, management, and results evaluation.
6. Assume the first four sampling events will occur during the first year, and the quarterly sampling the 2nd and 3rd years.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	16	\$100.00	/hr.	\$1,600.00
Field Technician (H-4)	56	\$35.00	/hr.	\$1,960.00
Field Technician (H-4)	56	\$35.00	/hr.	\$1,960.00
Project Chemist (E-6)	30	\$50.00	/hr.	\$1,500.00
Geologist (E-8)	16	\$58.00	/hr.	\$928.00

Equipment and Materials:

PID	7	\$50.00	/day	\$350.00
DO, ORP, pH, and turbidity meter	7	\$70.00	/day	\$490.00
PPE	7	\$24.00	/day	\$168.00
Water level indicator	7	\$14.00	/day	\$98.00
Submersible pump and control box	7	\$90.00	/day	\$630.00
Generator (120 V)	7	\$30.00	/day	\$210.00
Consumable Supplies	1	\$750.00	ls	\$750.00

Analytical:

VOCs - EPA 8260B	18	\$150.00	/ea.	\$2,700.00
Metals - EPA 6010B	18	\$250.00	/ea.	\$4,500.00
Chloride	18	\$50.00	/ea.	\$900.00
Shipping	2	\$50.00	/ea.	\$100.00

Contractor Travel:

Vehicle (4WD)	7	\$33.00	/day	\$231.00
Per Diem	14	\$30.00	/day	\$420.00
Lodging	14	\$55.00	/day	\$770.00

Total Cost Per Sampling Event: \$20,265.00
Total Cost Per Year (4 Sampling Events): \$81,060.00
1st Year Sampling Events: \$81,060.00
Present Worth of 2nd Year Sampling Events: \$75,758.68
Present Worth of 3rd Year Sampling Events: \$70,797.80

Capital Cost Subtotal \$81,060
Present Worth O&M Subtotal \$146,556

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

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9.0 Demobilization of Equipment and Personnel

Includes:

1. Decontamination and washdown of injection equipment (1/2 day).
2. Demobilization of Contractor Labor (1 day).
3. Demobilization of drilling subcontractor (cost included under mobilization).
4. Demobilization of fracturing and injection subcontractor (cost included under mobilization).
5. Demobilization of contractor sampling equipment, forklift, and generator.
6. Disposal of IDW.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	4	\$100.00	/hr.	\$400.00
Project Engineer (E-8)	12	\$62.00	/hr	\$744.00
Geologist (E-8)	12	\$58.00	/hr	\$696.00
Field Technician (H-4)	12	\$35.00	/hr	\$420.00
Equipment and Materials:				
50 kW Generator	1	\$100.00	/ea.	\$100.00
Forklift	1	\$250.00	/ea.	\$250.00
Field sampling and analysis equipment	1	\$100.00	/ea.	\$100.00
IDW Waste Characterization	1	\$2,000.00	ls	\$2,000.00
IDW Disposal	1	\$1,000.00	ls	\$1,000.00
Contractor Travel:				
Vehicle (4WD)	2	\$33.00	/day	\$66.00
Per Diem (3 personnel)	6	\$30.00	/ea.	\$180.00
Lodging (3 personnel)	6	\$55.00	/ea.	\$330.00
Capital Cost Subtotal				\$6,286

10.0 Second Permanganate Injection

Includes:

1. If required, a second permanganate injection is proposed should cleanup levels not be reached within one year of the initial injection.
2. For cost estimating purposes, the second injection is scoped at 25% of the initial injection.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Second Permanganate Injection	0.25	\$393,133.00	ls	\$98,283.25
Present Worth of Second Injection:				\$91,855.53
Capital Cost Subtotal				\$0
Present Worth O&M Subtotal				\$91,856

Table 4-2

**Cost Estimate for Alternative 3 - In Situ Chemical Oxidation
using Potassium Permanganate
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

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11.0 Reporting

Includes:

1. Fracturing and injection subcontractor summary letter report.
2. Contractor reporting on treatment events and summary of quarterly sampling results.

Service/Materials	No. Units	Unit Cost	Unit	Cost
Contractor Labor:				
Project Manager (E-12)	16	\$100.00	/hr	\$1,600.00
Senior Engineer (E-12)	20	\$97.00	/hr	\$1,940.00
Task Manager (E-8)	40	\$62.00	/hr	\$2,480.00
Project Engineer (E-8)	120	\$62.00	/hr	\$7,440.00
Geologist (E-8)	80	\$58.00	/hr	\$4,640.00
Drafting (E-6)	40	\$40.00	/hr	\$1,600.00
Document Reproduction (Draft and Final)	2	\$1,000.00	/ea.	\$2,000.00
Fracturing and Injection Subcontractor:				
Field Summary Letter Report	1	\$4,000.00	ls	\$4,000.00
Capital Cost Subtotal				\$25,700

12.0 Cost Summary

Base Capital Cost	\$805,675
Present Worth O&M Costs	\$238,412
Total Contingency (15%)	\$156,613
Total Net Present Worth Cost	\$1,200,700

5.0 Comparative Analysis of Alternatives

This chapter presents a comparative analysis of alternatives to evaluate the relative performance of each alternative with respect to the seven evaluation criteria presented in Chapter 4.0. The purpose of this analysis is to determine the advantages and disadvantages of each alternative, which will ultimately provide the rationale for recommending a preferred alternative.

5.1 Overall Protection of Human Health and the Environment

The three alternatives provide varying levels of human health protection. Alternative 1 (no action) does not achieve the RAO; it provides no reduction in human health risk because measures would not be implemented to eliminate the pathway for human exposure to groundwater. Furthermore, Alternative 1 does not actively reduce the COC concentrations in the groundwater to the RGOs.

Alternative 2 (LUCs) would be protective of human health because LUCs would prohibit the development of groundwater as a potable water source, thereby eliminating the potential contaminant exposure pathway for human receptors. Alternative 2 satisfies the RAO for Parcel 66(7), although no active reduction of COC concentrations in groundwater would be achieved under this alternative.

Alternative 3, which involves in situ chemical oxidation using KMnO_4 and groundwater monitoring, would provide the highest level of human health protection as compared to the other remedial alternatives selected for detailed analysis. Alternative 3 achieves the RAO by reducing the above-MCL COC concentrations in groundwater to the RGOs; therefore, the ILCR and HI estimates would be reduced to acceptable risk management levels. Per the RI, no site media at Parcel 66(7) do not present a risk to the terrestrial ecosystems at FTMC.

5.2 Compliance with ARARs

5.2.1 Chemical-Specific ARARs

Alternatives 1 and 2 do not comply with the chemical-specific ARARs for the above-MCL levels of COCs in groundwater because no remedial activities are associated with either alternative. Alternative 3 complies with the chemical-specific ARARs because the KMnO_4 would react with the COCs in the groundwater resulting in the formation of innocuous breakdown products and the reduction of COC concentrations to the RGOs.

1 **5.2.2 Location-Specific ARARs**

2 Location-specific ARARs do not pertain to Alternatives 1 and 2 because no active remedial
3 actions would be conducted under these alternatives. Alternative 3 complies with all location-
4 specific ARARs.

5
6 **5.2.3 Action-Specific ARARs**

7 Action-specific ARARs do not pertain to Alternatives 1 and 2 because no remedial activities
8 would be conducted under these alternatives. Alternative 3 complies with all action-specific
9 ARARs.

10
11 **5.3 Long-Term Effectiveness and Permanence**

12 Alternative 1 (no action) does not reduce the COC concentrations in groundwater or provide any
13 controls to reduce the potential for human exposure and would therefore be the least effective
14 alternative over the long term. Alternative 1 would not provide a permanent remedy for the
15 exposure risk posed by the elevated COC concentrations in the groundwater.

16
17 Alternative 2 (LUCs) offers a moderate degree of long-term effectiveness through the
18 implementation of LUCs, which would eliminate the potential for human exposure to the
19 elevated COC concentrations in the groundwater. The long-term effectiveness of the LUCs
20 would depend on the proper implementation and coordination of activities defined in the LUCIP.
21 Alternative 2, however, does not actively reduce the COC concentrations in the groundwater to
22 the RGOs; therefore, maintenance of the LUCs would be required indefinitely.

23
24 Alternative 3 (in situ KMnO_4 oxidation) would significantly and permanently decrease the
25 chlorinated ethene concentrations in groundwater at Parcel 66(7) to the RGOs. Although in situ
26 chemical oxidation using KMnO_4 will not treat the chlorinated ethane 1,2-DCA, this COC is
27 present in the residuum groundwater at a concentration below its MCL. Therefore, active
28 remediation for this COC is not required. This alternative offers the highest degree of long-term
29 effectiveness compared to the other remedial alternatives. Reduction of the above-MCL levels
30 of COCs to the RGOs would allow the Army to release Parcel 66(7) to the public domain for
31 unrestricted reuse (i.e., LUCs would not be required).

32
33 **5.4 Reduction of Toxicity, Mobility, and Volume**

34 Alternatives 1 and 2 would not reduce the toxicity, mobility, or volume of contaminants in the
35 groundwater at the site because no active remedial process would be conducted under these
36 alternatives. Alternative 3 will permanently reduce the toxicity, mobility, and volume of the

1 chlorinated ethenes through the irreversible oxidation of these chemicals to innocuous
2 breakdown products.

4 **5.5 Short-Term Effectiveness**

5 Because Alternatives 1 and 2 do not involve any active remedial measures, no short-term risks to
6 worker health and safety or the community are expected. Alternative 2 would provide almost
7 immediate protection from the risk associated with elevated COC concentrations in the
8 groundwater through the installation of fencing and warning signs and the prohibition of potable
9 well installation. However, for Alternative 2, worker exposure to contaminated groundwater is
10 possible during groundwater monitoring activities. Since Alternative 2 does not actively reduce
11 the COC concentrations in the groundwater to the RGOs, maintenance of the LUCs would be
12 required indefinitely.

13
14 Alternative 3 would involve potential short-term risks to workers associated with general
15 construction activities and potential exposure to KMnO_4 . The demolition of Building 335 and
16 subsurface fracturing activities would require operation of heavy equipment that would increase
17 the risk to remediation workers. Other risks to workers include those generally associated with
18 construction activities, (e.g., slips, trips, and falls). The use of KMnO_4 during the injection
19 activities would also increase the risk to the remediation workers because KMnO_4 is a strong
20 oxidant and may cause damage to the eyes, skin, and the respiratory tract. The implementation
21 of proper engineering controls and safety equipment would minimize any short-term risks to the
22 community or remediation workers. The estimated time to achieve the groundwater RGOs under
23 this alternative is 12 to 24 months.

25 **5.6 Implementability**

26 This criterion does not apply to Alternative 1 because no remedial action would be taken as part
27 of this alternative. Alternative 2 is easily implemented because no remedial activities would be
28 performed, although routine inspections and maintenance of the LUCs would be required.
29 Alternative 3 is also easily implementable, although less so than Alternatives 1 and 2. The
30 chemicals and equipment required for Alternative 3 are readily available, and the injection
31 approach has been repeatedly field tested in similar lithologies.

33 **5.7 Cost**

34 The progression of present worth costs from the least expensive alternative to the most expensive
35 alternative is as follows: Alternative 1, Alternative 2, and Alternative 3.

1 No cost is associated with Alternative 1 because no remedial activities would be conducted to
2 address groundwater contamination at the site. Although no remedial activities would be
3 conducted for Alternative 2, cost is associated with maintenance of the LUCs, annual and five-
4 year reviews, meetings, and groundwater monitoring. The cost associated with Alternative 3 is
5 the highest because remedial activities would be conducted under this alternative. A cost
6 comparison of the alternatives is included in Table 5-1.

Table 5-1

**Detailed Cost Analysis Summary
Small Weapons Repair Shop, Parcel 66(7)
Fort McClellan, Calhoun County, Alabama**

ALTERNATIVE	DESCRIPTION	BASE CAPITAL COST	PRESENT WORTH O&M COST	TOTAL PRESENT WORTH COST (INCLUDES 15% CONTINGENCY)
1	No Action	\$0	\$0	\$0
2	Land-Use Controls	\$109,847	\$350,252	\$529,100
3	In Situ KMnO ₄ Oxidation	\$805,675	\$238,412	\$1,200,700

1 **6.0 Recommended Remedial Alternative**

2
3 Based on the detailed analysis of remedial alternatives presented in Chapter 5.0, Alternative 2 –
4 Land-Use Controls, most appropriately addresses the groundwater contamination at Parcel 66(7)
5 in a manner that is cost-effective and consistent with the Army’s intent to transfer the parcel to
6 the public domain for future industrial reuse. The SRA conducted as part of the RI concluded
7 that the groundwater contamination would not present an unacceptable risk to human health
8 provided that groundwater at the site is not developed as a source of potable water. Alternative 2
9 would be protective of human health because the LUCs would prohibit development of
10 groundwater as a potable water source, thereby eliminating the potential contaminant exposure
11 pathway for human receptors. Alternative 2 also satisfies the RAO for Parcel 66(7), although no
12 active reduction of COC concentrations in groundwater to the RGOs would be achieved under
13 this alternative. Furthermore, because Alternative 2 does not involve any active remedial
14 measures, it is easily implemented and no significant short-term risks to worker health and safety
15 or the community would be expected. Therefore, the recommended remedial alternative for
16 Parcel 66(7) is Alternative 2 - Land-Use Controls.

1 **7.0 References**

2
3 ARS Technologies, 2002, online, www.arstechnologies.com.

4
5 Environmental Science and Engineering, Inc., (ESE), 1998, ***Final Environmental Baseline***
6 ***Survey, Fort McClellan, Alabama***, prepared for U. S. Army Environmental Center, Aberdeen
7 Proving Ground, Maryland, January.

8
9 Fort McClellan (FTMC), 1985, Letter from LTC Robert Cooper to LTC George Pincince
10 (Director of Engineering and Housing, Fort McClellan, Alabama), "*Possible Water Pollution at*
11 *Weapons Branch, Building 335*," December 18.

12
13 IT Corporation (IT), 2002, ***Draft Remedial Investigation Report, Small Weapons Repair Shop,***
14 ***Parcel 66(7), Fort McClellan, Calhoun County, Alabama***, May.

15
16 IT Corporation (IT), 2000, ***Final Human Health and Ecological Screening Values and PAH***
17 ***Background Summary Report, Fort McClellan, Calhoun County, Alabama***, July.

18
19 U.S. Department of Defense (DOD), 2001, ***Department of Defense Guidance on Land Use***
20 ***Controls Associated with Environmental Restoration Activities for Property Planned for***
21 ***Transfer Out of Federal Control***, Office of the Under Secretary of Defense, Washington, DC,
22 August.

23
24 U.S. Environmental Protection Agency (EPA), 2000, ***Drinking Water Standards and Health***
25 ***Advisories***, Office of Water, Washington, DC, EPA 822-B-00-001, Summer.

26
27 U.S. Environmental Protection Agency (EPA), 1991, ***National Oil and Hazardous Substances***
28 ***Pollution Contingency Plan, Part 300, Subpart E***.

29
30 U.S. Environmental Protection Agency (EPA), 1988, ***Guidance for Conducting Remedial***
31 ***Investigations and Feasibility Studies Under CERCLA***, Interim Final, Office of Emergency and
32 Remedial Response, EPA/540/G-89/004, OSWER Directive 9355.3-01.

33
34 Yan, Y.E., and F.W. Schwartz, 2000, "Oxidative Degradation of Chlorinated Ethylenes by
35 Potassium Permanganate," ***Ohio State University Progress Report 2000***.

ATTACHMENT 1

LIST OF ABBREVIATIONS AND ACRONYMS

List of Abbreviations and Acronyms

2,4-D	2,4-dichlorophenoxyacetic acid	'B'	Analyte detected in laboratory or field blank at concentration greater than the reporting limit (and greater than zero)	CG	carbonyl chloride (phosgene)
2,4,5-T	2,4,5-trichlorophenoxyacetic acid	BCF	blank correction factor; bioconcentration factor	CGI	combustible gas indicator
2,4,5-TP	silvex	BCT	BRAC Cleanup Team	ch	inorganic clays of high plasticity
3D	3D International Environmental Group	BERA	baseline ecological risk assessment	CHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
AB	ambient blank	BEHP	bis(2-ethylhexyl)phthalate	CK	cyanogen chloride
AbB3	Anniston gravelly clay loam, 2 to 6 percent slopes, severely eroded	BFB	bromofluorobenzene	cl	inorganic clays of low to medium plasticity
AbC3	Anniston gravelly clay loam, 6 to 10 percent slopes, severely eroded	BFE	base flood elevation	Cl	chlorinated
AbD3	Anniston and Allen gravelly clay loams, 10 to 15 percent slopes, eroded	BG	Bacillus globigii	CLP	Contract Laboratory Program
Abs	skin absorption	BGR	Bains Gap Road	cm	centimeter
ABS	dermal absorption factor	bgs	below ground surface	CN	chloroacetophenone
AC	hydrogen cyanide	BHC	betahexachlorocyclohexane	CNB	chloroacetophenone, benzene, and carbon tetrachloride
ACAD	AutoCadd	BHHRA	baseline human health risk assessment	CNS	chloroacetophenone, chloropicrin, and chloroform
AcB2	Anniston and Allen gravelly loams, 2 to 6 percent slopes, eroded	BIRTC	Branch Immaterial Replacement Training Center	CO	carbon monoxide
AcC2	Anniston and Allen gravelly loams, 6 to 10 percent slopes, eroded	bkg	background	CO ₂	carbon dioxide
AcD2	Anniston and Allen gravelly loams, 10 to 15 percent slopes, eroded	bls	below land surface	Co-60	cobalt-60
AcE2	Anniston and Allen gravelly loams, 15 to 25 percent slopes, eroded	BOD	biological oxygen demand	CoA	Code of Alabama
ACGIH	American Conference of Governmental Industrial Hygienists	Bp	soil-to-plant biotransfer factors	COC	chain of custody; chemical of concern
AdE	Anniston and Allen stony loam, 10 to 25 percent slope	BRAC	Base Realignment and Closure	COE	Corps of Engineers
ADEM	Alabama Department of Environmental Management	Braun	Braun Intertec Corporation	Con	skin or eye contact
ADPH	Alabama Department of Public Health	BSAF	biota-to-sediment accumulation factors	COPC	chemical(s) of potential concern
AEC	U.S. Army Environmental Center	BSC	background screening criterion	COPEC	chemical(s)/constituent(s) of potential ecological concern
AEL	airborne exposure limit	BTAG	Biological Technical Assistance Group	CPSS	chemicals present in site samples
AET	adverse effect threshold	BTEX	benzene, toluene, ethyl benzene, and xylenes	CQCSM	Contract Quality Control System Manager
AF	soil-to-skin adherence factor	BTOC	below top of casing	CRDL	contract-required detection limit
AHA	ammunition holding area	BTV	background threshold value	CRL	certified reporting limit
AL	Alabama	BW	biological warfare; body weight	CRQL	contract-required quantitation limit
ALAD	- aminolevulinic acid dehydratase	BZ	breathing zone; 3-quinuclidinyl benzilate	CRZ	contamination reduction zone
amb.	amber	C	ceiling limit value	Cs-137	cesium-137
amsl	above mean sea level	Ca	carcinogen	CS	ortho-chlorobenzylidene-malononitrile
ANAD	Anniston Army Depot	CaCO ₃	calcium carbonate	CSEM	conceptual site exposure model
AOC	area of concern	CAA	Clean Air Act	CSM	conceptual site model
APEC	areas of potential ecological concern	CAB	chemical warfare agent breakdown products	CT	central tendency
APT	armor-piercing tracer	CAMU	corrective action management unit	ctr.	container
AR	analysis request	CBR	chemical, biological, and radiological	CWA	chemical warfare agent; Clean Water Act
ARAR	applicable or relevant and appropriate requirement	CCAL	continuing calibration	CWM	chemical warfare material; clear, wide mouth
AREE	area requiring environmental evaluation	CCB	continuing calibration blank	CX	dichloroformoxime
AS/SVE	air sparging/soil vapor extraction	CCV	continuing calibration verification	'D'	duplicate; dilution
ASP	Ammunition Supply Point	CD	compact disc	D&I	detection and identification
ASR	Archives Search Report	CDTF	Chemical Defense Training Facility	DAAMS	depot area air monitoring system
AST	aboveground storage tank	CEHNC	U.S. Army Engineering and Support Center, Huntsville	DAF	dilution-attenuation factor
ASTM	American Society for Testing and Materials	CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	DANC	decontamination agent, non-corrosive
AT	averaging time	CERFA	Community Environmental Response Facilitation Act	°C	degrees Celsius
ATSDR	Agency for Toxic Substances and Disease Registry	CESAS	Corps of Engineers South Atlantic Savannah	°F	degrees Fahrenheit
ATV	all-terrain vehicle	CF	conversion factor	DCA	dichloroethane
AUF	area use factor	CFC	chlorofluorocarbon	DCE	dichloroethene
AWARE	Associated Water and Air Resources Engineers, Inc.	CFDP	Center for Domestic Preparedness	DDD	dichlorodiphenyldichloroethane
AWQC	ambient water quality criteria	CFR	Code of Federal Regulations	DDE	dichlorodiphenyldichloroethene
AWWSB	Anniston Water Works and Sewer Board			DDT	dichlorodiphenyltrichloroethane

List of Abbreviations and Acronyms (Continued)

DEH	Directorate of Engineering and Housing	ESMP	Endangered Species Management Plan	gc	clay gravels; gravel-sand-clay mixtures
DEP	depositional soil	ESN	Environmental Services Network, Inc.	GC	gas chromatograph
DFTPP	decafluorotriphenylphosphine	ESV	ecological screening value	GCL	geosynthetic clay liner
DI	deionized	ET	exposure time	GC/MS	gas chromatograph/mass spectrometer
DID	data item description	EU	exposure unit	GCR	geosynthetic clay liner
DIMP	di-isopropylmethylphosphonate	Exp.	explosives	GFAA	graphite furnace atomic absorption
DM	dry matter; adamsite	E-W	east to west	GIS	Geographic Information System
DMBA	dimethylbenz(a)anthracene	EZ	exclusion zone	gm	silty gravels; gravel-sand-silt mixtures
DMMP	dimethylmethylphosphonate	FAR	Federal Acquisition Regulations	gp	poorly graded gravels; gravel-sand mixtures
DOD	U.S. Department of Defense	FB	field blank	gpm	gallons per minute
DOJ	U.S. Department of Justice	FD	field duplicate	GPR	ground-penetrating radar
DOT	U.S. Department of Transportation	FDA	U.S. Food and Drug Administration	GPS	global positioning system
DP	direct-push	Fe ⁺³	ferric iron	GRA	general response action
DPDO	Defense Property Disposal Office	Fe ⁺²	ferrous iron	GS	ground scar
DPT	direct-push technology	FedEx	Federal Express, Inc.	GSA	General Services Administration; Geologic Survey of Alabama
DQO	data quality objective	FEMA	Federal Emergency Management Agency	GSBP	Ground Scar Boiler Plant
DRMO	Defense Reutilization and Marketing Office	FFCA	Federal Facilities Compliance Act	GSSI	Geophysical Survey Systems, Inc.
DRO	diesel range organics	FFE	field flame expedient	GST	ground stain
DS	deep (subsurface) soil	FFS	focused feasibility study	GW	groundwater
DS2	Decontamination Solution Number 2	FI	fraction of exposure	gw	well-graded gravels; gravel-sand mixtures
DSERTS	Defense Site Environmental Restoration Tracking System	Fil	filtered	H&S	health and safety
DWEL	drinking water equivalent level	Flt	filtered	HA	hand auger
E&E	Ecology and Environment, Inc.	FMDC	Fort McClellan Development Commission	HCl	hydrochloric acid
EB	equipment blank	FML	flexible membrane liner	HD	distilled mustard
EBS	environmental baseline survey	FMP 1300	Former Motor Pool 1300	HDPE	high-density polyethylene
EC ₅₀	effects concentration for 50 percent of a population	f _{oc}	fraction organic carbon	HEAST	Health Effects Assessment Summary Tables
ECBC	Edgewood Chemical/Biological Command	FOMRA	Former Ordnance Motor Repair Area	Herb.	herbicides
ED	exposure duration	FOST	Finding of Suitability to Transfer	HHRA	human health risk assessment
EDD	electronic data deliverable	Foster Wheeler	Foster Wheeler Environmental Corporation	HI	hazard index
EF	exposure frequency	FR	Federal Register	H ₂ O ₂	hydrogen peroxide
EDQL	ecological data quality level	Frtn	fraction	HPLC	high performance liquid chromatography
EE/CA	engineering evaluation and cost analysis	FS	field split; feasibility study	HNO ₃	nitric acid
Elev.	elevation	FSP	field sampling plan	HQ	hazard quotient
EM	electromagnetic	ft	feet	HQ _{screen}	screening-level hazard quotient
EMI	Environmental Management Inc.	ft/day	feet per day	hr	hour
EM31	Geonics Limited EM31 Terrain Conductivity Meter	ft/ft	feet per foot	HRC	hydrogen releasing compound
EM61	Geonics Limited EM61 High-Resolution Metal Detector	ft/yr	feet per year	HSA	hollow-stem auger
EOD	explosive ordnance disposal	FTA	Fire Training Area	HTRW	hazardous, toxic, and radioactive waste
EODT	explosive ordnance disposal team	FTMC	Fort McClellan	'I'	out of control, data rejected due to low recovery
EPA	U.S. Environmental Protection Agency	FTRRA	FTMC Reuse & Redevelopment Authority	IATA	International Air Transport Authority
EPC	exposure point concentration	g	gram	ICAL	initial calibration
EPIC	Environmental Photographic Interpretation Center	g/m ³	gram per cubic meter	ICB	initial calibration blank
EPRI	Electrical Power Research Institute	G-856	Geometrics, Inc. G-856 magnetometer	ICP	inductively-coupled plasma
ER	equipment rinsate	G-858G	Geometrics, Inc. G-858G magnetic gradiometer	ICRP	International Commission on Radiological Protection
ERA	ecological risk assessment	GAF	gastrointestinal absorption factor	ICS	interference check sample
ER-L	effects range-low	gal	gallon	ID	inside diameter
ER-M	effects range-medium	gal/min	gallons per minute	IDL	instrument detection limit
ESE	Environmental Science and Engineering, Inc.	GB	sarin	IDLH	immediately dangerous to life or health

List of Abbreviations and Acronyms (Continued)

IDM	investigative-derived media	max	maximum	MW	monitoring well
IDW	investigation-derived waste	MB	method blank	MWI&P	Monitoring Well Installation and Management Plan
IEUBK	Integrated Exposure Uptake Biokinetic	MCL	maximum contaminant level	Na	sodium
IF	ingestion factor; inhalation factor	MCLG	maximum contaminant level goal	NA	not applicable; not available
ILCR	incremental lifetime cancer risk	MCPA	4-chloro-2-methylphenoxyacetic acid	NAD	North American Datum
IMPA	isopropylmethyl phosphonic acid	MCS	media cleanup standard	NAD83	North American Datum of 1983
IMR	Iron Mountain Road	MD	matrix duplicate	NaMnO ₄	sodium permanganate
in.	inch	MDC	maximum detected concentration	NAVD88	North American Vertical Datum of 1988
Ing	ingestion	MDCC	maximum detected constituent concentration	NAS	National Academy of Sciences
Inh	inhalation	MDL	method detection limit	NCEA	National Center for Environmental Assessment
IP	ionization potential	mg	milligrams	NCP	National Contingency Plan
IPS	International Pipe Standard	mg/kg	milligrams per kilogram	NCRP	National Council on Radiation Protection and Measurements
IR	ingestion rate	mg/kg/day	milligram per kilogram per day	ND	not detected
IRDMIS	Installation Restoration Data Management Information System	mg/kgbw/day	milligrams per kilogram of body weight per day	NE	no evidence; northeast
IRIS	Integrated Risk Information Service	mg/L	milligrams per liter	ne	not evaluated
IRP	Installation Restoration Program	mg/m ³	milligrams per cubic meter	NEW	net explosive weight
IS	internal standard	mh	inorganic silts, micaceous or diatomaceous fine, sandy or silt soils	NFA	No Further Action
ISCP	Installation Spill Contingency Plan	MHz	megahertz	NG	National Guard
IT	IT Corporation	µg/g	micrograms per gram	NGP	National Guardsperson
ITEMS	IT Environmental Management System™	µg/kg	micrograms per kilogram	ng/L	nanograms per liter
'J'	estimated concentration	µg/L	micrograms per liter	NGVD	National Geodetic Vertical Datum
JeB2	Jefferson gravelly fine sandy loam, 2 to 6 percent slopes, eroded	µmhos/cm	micromhos per centimeter	Ni	nickel
JeC2	Jefferson gravelly fine sandy loam, 6 to 10 percent slopes, eroded	MeV	mega electron volt	NIC	notice of intended change
JfB	Jefferson stony fine sandy loam, 0 to 10 percent slopes have strong slopes	min	minimum	NIOSH	National Institute for Occupational Safety and Health
JPA	Joint Powers Authority	MINICAMS	miniature continuous air monitoring system	NIST	National Institute of Standards and Technology
K	conductivity	ml	inorganic silts and very fine sands	NLM	National Library of Medicine
K _d	soil-water distribution coefficient	mL	milliliter	NO ₃ ⁻	nitrate
kg	kilogram	mm	millimeter	NPDES	National Pollutant Discharge Elimination System
KeV	kilo electron volt	MM	mounded material	NPW	net present worth
K _{oc}	organic carbon partitioning coefficient	MMBtu/hr	million Btu per hour	No.	number
K _{ow}	octonal-water partition coefficient	MNA	monitored natural attenuation	NOAA	National Oceanic and Atmospheric Administration
KMnO ₄	potassium permanganate	MnO ₄ ⁻	permanganate ion	NOAEL	no-observed-adverse-effects-level
L	lewisite; liter	MOGAS	motor vehicle gasoline	NR	not requested; not recorded; no risk
L/kg/day	liters per kilogram per day	MOUT	Military Operations in Urban Terrain	NRC	National Research Council
l	liter	MP	Military Police	NRCC	National Research Council of Canada
lb	pound	MPA	methyl phosphonic acid	NRHP	National Register of Historic Places
LBP	lead-based paint	MPM	most probable munition	ns	nanosecond
LC	liquid chromatography	MQL	method quantitation limit	N-S	north to south
LCS	laboratory control sample	MR	molasses residue	NS	not surveyed
LC ₅₀	lethal concentration for 50 percent population tested	MRL	method reporting limit	NSA	New South Associates, Inc.
LD ₅₀	lethal dose for 50 percent population tested	MS	matrix spike	nT	nanotesla
LEL	lower explosive limit	mS/cm	millisiemens per centimeter	nT/m	nanoteslas per meter
LOAEL	lowest-observed-adverse-effects-level	mS/m	millisiemens per meter	NTU	nephelometric turbidity unit
LRA	land redevelopment authority	MSD	matrix spike duplicate	nv	not validated
LT	less than the certified reporting limit	MTBE	methyl tertiary butyl ether	O ₂	oxygen
LUC	land-use control	msl	mean sea level	O ₃	ozone
LUCAP	land-use control assurance plan	MtD3	Montevallo shaly, silty clay loam, 10 to 40 percent slopes, severely eroded	O&G	oil and grease
LUCIP	land-use control implementation plan	mV	millivolts	O&M	operation and maintenance

List of Abbreviations and Acronyms (Continued)

OB/OD	open burning/open detonation	ppt	parts per thousand	sc	clayey sands; sand-clay mixtures
OD	outside diameter	PR	potential risk	Sch.	Schedule
OE	ordnance and explosives	PRA	preliminary risk assessment	SCM	site conceptual model
oh	organic clays of medium to high plasticity	PRG	preliminary remediation goal	SD	sediment
OH•	hydroxyl radical	PS	chloropicrin	SDG	sample delivery group
ol	organic silts and organic silty clays of low plasticity	PSSC	potential site-specific chemical	SDWA	Safe Drinking Water Act
OP	organophosphorus	pt	peat or other highly organic silts	SDZ	safe distance zone; surface danger zone
ORC	Oxygen Releasing Compound	PVC	polyvinyl chloride	SEMS	Southern Environmental Management & Specialties, Inc.
ORP	oxidation-reduction potential	QA	quality assurance	SF	cancer slope factor
OSHA	Occupational Safety and Health Administration	QA/QC	quality assurance/quality control	SFSP	site-specific field sampling plan
OSWER	Office of Solid Waste and Emergency Response	QAM	quality assurance manual	SGF	standard grade fuels
OVM-PID/FID	organic vapor meter-photoionization detector/flame ionization detector	QAO	quality assurance officer	SHP	installation-wide safety and health plan
OWS	oil/water separator	QAP	installation-wide quality assurance plan	SI	site investigation
oz	ounce	QC	quality control	SINA	Special Interest Natural Area
PA	preliminary assessment	QST	QST Environmental, Inc.	SL	standing liquid
PAH	polynuclear aromatic hydrocarbon	qty	quantity	SLERA	screening-level ecological risk assessment
PARCCS	precision, accuracy, representativeness, comparability, completeness, and sensitivity	Qual	qualifier	sm	silty sands; sand-silt mixtures
Parsons	Parsons Engineering Science, Inc.	R	rejected data; resample; retardation factor	SM	Serratia marcescens
Pb	lead	R&A	relevant and appropriate	SMDP	Scientific Management Decision Point
PBMS	performance-based measurement system	RA	remedial action	s/n	signal-to-noise ratio
PC	permeability coefficient	RAO	remedial action objective	SO ₄ ⁻²	sulfate
PCB	polychlorinated biphenyl	RBC	risk-based concentration; red blood cell	SOD	soil oxidant demand
PCDD	polychlorinated dibenzo-p-dioxins	RCRA	Resource Conservation and Recovery Act	SOP	standard operating procedure
PCDF	polychlorinated dibenzofurans	RD	remedial design	SOPQAM	U.S. EPA's <i>Standard Operating Procedure/Quality Assurance Manual</i>
PCE	perchloroethene	RDX	cyclonite	sp	poorly graded sands; gravelly sands
PCP	pentachlorophenol	ReB3	Rarden silty clay loams	SP	submersible pump
PDS	Personnel Decontamination Station	REG	regular field sample	SPCC	system performance calibration compound
PEF	particulate emission factor	REL	recommended exposure limit	SPCS	State Plane Coordinate System
PEL	permissible exposure limit	RFA	request for analysis	SPM	sample planning module
PERA	preliminary ecological risk assessment	RfC	reference concentration	SQRT	screening quick reference tables
PES	potential explosive site	RfD	reference dose	Sr-90	strontium-90
Pest.	pesticides	RGO	remedial goal option	SRA	streamlined human health risk assessment
PETN	pentarey thritol tetranitrate	RI	remedial investigation	SRM	standard reference material
PFT	portable flamethrower	RL	reporting limit	Ss	stony rough land, sandstone series
PG	professional geologist	RME	reasonable maximum exposure	SS	surface soil
PID	photoionization detector	ROD	Record of Decision	SSC	site-specific chemical
PkA	Philo and Stendal soils local alluvium, 0 to 2 percent slopes	RPD	relative percent difference	SSHO	site safety and health officer
PM	project manager	RRF	relative response factor	SSHP	site-specific safety and health plan
POC	point of contact	RSD	relative standard deviation	SSL	soil screening level
POL	petroleum, oils, and lubricants	RTC	Recruiting Training Center	SSSL	site-specific screening level
POTW	publicly owned treatment works	RTECS	Registry of Toxic Effects of Chemical Substances	SSSSL	site-specific soil screening level
POW	prisoner of war	RTK	real-time kinematic	STB	supertropical bleach
PP	peristaltic pump; Proposed Plan	SA	exposed skin surface area	STC	source-term concentration
ppb	parts per billion	SAD	South Atlantic Division	STD	standard deviation
PPE	personal protective equipment	SAE	Society of Automotive Engineers	STEL	short-term exposure limit
ppm	parts per million	SAIC	Science Applications International Corporation	STL	Severn-Trent Laboratories
PPMP	Print Plant Motor Pool	SAP	installation-wide sampling and analysis plan	STOLS	Surface Towed Ordnance Locator System®
		SARA	Superfund Amendments and Reauthorization Act	Std. units	standard units

List of Abbreviations and Acronyms (Continued)

SU	standard unit	USATEU	U.S. Army Technical Escort Unit
SUXOS	senior UXO supervisor	USATHAMA	U.S. Army Toxic and Hazardous Material Agency
SVOC	semivolatile organic compound	USC	United States Code
SW	surface water	USCS	Unified Soil Classification System
SW-846	U.S. EPA's <i>Test Methods for Evaluating Solid Waste: Physical/Chemical Methods</i>	USDA	U.S. Department of Agriculture
SWMU	solid waste management unit	USEPA	U.S. Environmental Protection Agency
SWPP	storm water pollution prevention plan	USFWS	U.S. Fish and Wildlife Service
SZ	support zone	USGS	U.S. Geological Survey
TAL	target analyte list	UST	underground storage tank
TAT	turn around time	UTL	upper tolerance level; upper tolerance limit
TB	trip blank	UXO	unexploded ordnance
TBC	to be considered	UXOQCS	UXO Quality Control Supervisor
TCA	trichloroethane	UXOSO	UXO safety officer
TCDD	2,3,7,8-tetrachlorodibenzo-p-dioxin	V	vanadium
TCDF	tetrachlorodibenzofurans	VC	vinyl chloride
TCE	trichloroethene	VOA	volatile organic analyte
TCL	target compound list	VOC	volatile organic compound
TCLP	toxicity characteristic leaching procedure	VOH	volatile organic hydrocarbon
TDEC	Tennessee Department of Environment and Conservation	VQlfr	validation qualifier
TDGCL	thiodiglycol	VQual	validation qualifier
TDGCLA	thiodiglycol chloroacetic acid	VX	nerve agent (O-ethyl-S-[diisopropylaminoethyl]-methylphosphonothiolate)
TERC	Total Environmental Restoration Contract	WAC	Women's Army Corps
THI	target hazard index	Weston	Roy F. Weston, Inc.
TIC	tentatively identified compound	WP	installation-wide work plan
TLV	threshold limit value	WRS	Wilcoxon rank sum
TN	Tennessee	WS	watershed
TNT	trinitrotoluene	WSA	Watershed Screening Assessment
TOC	top of casing; total organic carbon	WWI	World War I
TPH	total petroleum hydrocarbons	WWII	World War II
TR	target cancer risk	XRF	x-ray fluorescence
TRADOC	U.S. Army Training and Doctrine Command	yd ³	cubic yards
TRPH	total recoverable petroleum hydrocarbons		
TSCA	Toxic Substances Control Act		
TSDF	treatment, storage, and disposal facility		
TWA	time-weighted average		
UBR	upper background range		
UCL	upper confidence limit		
UCR	upper certified range		
'U'	not detected above reporting limit		
UIC	underground injection control		
UF	uncertainty factor		
USACE	U.S. Army Corps of Engineers		
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine		
USAEC	U.S. Army Environmental Center		
USAEHA	U.S. Army Environmental Hygiene Agency		
USACMLS	U.S. Army Chemical School		
USAMPS	U.S. Army Military Police School		
USATCES	U.S. Army Technical Center for Explosive Safety		