

**DRAFT SITE INVESTIGATION REPORT  
AND DECISION DOCUMENT FOR THE  
CHEMICAL DEFENSE TRAINING FACILITY  
PARCELS 126Q, 62(2), 59(7), AND 104(7)  
FORT MCCLELLAN, CALHOUN COUNTY, ALABAMA  
RESPONSE TO COMMENTS BY  
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 4**

*Reference: Comments by Bart Reedy.*

**Specific Comments**

**Comment 1:**           **Table 3-3: The table indicates that sumps exist for monitoring wells CDTF-126Q-MW01 at "23 to 23" feet below ground surface (bgs) and CDTF-126Q-MW04 at "36.5 to 36.5" feet bgs. The well construction diagrams do not show the existence of sumps. To avoid confusion, the table should be corrected to read "not applicable (NA)" or "no sump installed" for these two sump intervals.**

**Response:**           Agree. The table will be revised as recommended.

**Comment 2:**           **Table 3-5: The table shows that the groundwater sampling depth of monitoring well CDTF-126-MW03 is 3 to 13 feet below ground surface (bgs). However, depth to water from the sample collection log in Appendix A on August 5, 1999 is 11.69 feet bgs. The sample could not have been collected from an interval of 3 to 11.68 feet bgs because no groundwater was present at this interval. The table should be corrected to show the correct sampling interval and the sampling date should be provided on the table.**

**Response:**           Agree. The table will be revised to show the correct sampling interval. Groundwater sample collection dates are already provided on Table 3-6.

**Comment 3:**           **Appendix A: The chain of custody record does not have a "received by" signature. All chain of custody records should always have this signature or an explanation should be provided as to why these signatures were omitted. Without this signature, the chain of custody is not complete.**

**Response:**           The chain of custody records included in the Appendix A Draft were the copies made in the field when the sample cooler was shipped to the laboratory. Samples being sent to the laboratory via Fed Ex are signed by the sample custodian at the site, leaving the received signature blank for

the receiving laboratory. For the Final report, COC records that have been signed by the laboratory receiving personnel have been included.

## **RISK ASSESSMENT COMMENTS**

### **General Comments**

**Comment 1:** The text of Section 5.0 presents a summary of the analytical results available for the Chemical Defense Training Facility (CDTF). It is stated that the analytical results were compared to Draft site-specific screening levels (SSSLs). However, the text does not provide any information on the derivation of these values or the reference in which they are contained. For a complete understanding of the analytical results presented in this section, additional information on SSSLs should be included.

**Response:** Agree. The *Final Human Health and Ecological Screening Values and PAH Background Summary Report* was submitted July 2000, and will be referenced in the text and tables. The Executive Summary, Section 1.2, 5.0, 6.0, and Section 5.0 table endnotes were changed for the Final report.

**Comment 2:** In this report, lead detections in surface soil and depositional soil samples that exceed 2X background are compared to maximum background values. It is inappropriate to use maximum background values for screening purposes at any Ft. McClellan parcel. The Background Metals Survey Report (SAIC, 1998) was prepared so that 2X average background values could be determined to be used for screening purposes. The discussion of maximum background values should be omitted from the report.

**Response:** Disagree. As agreed to during the August 2000 BCT meeting, the comparison to the maximum background value was to demonstrate that the value was within range of background sample values collected and was not an abnormally high result. No change to the document was made.

### **Risk Related Specific Comments**

**Comment 1:** Tables 5-1 through 5-5: The tables present a comparison of the analytical results from various media with established human health and ecological screening levels. However, the table does not include source information for the SSSLs. A complete reference should be included in the endnotes of the table.

**Response:** Agree. See response to General Comment 1.

**Comment 2:**

**Section 6.3, Page 6-3: This section provides conclusions and recommendations for the analysis performed at the Chemical Warfare Training Facility (CWTF). The first sentence of the second paragraph states that with the exception of lead, there does not appear to be a well-defined spatial distribution of metals detected in any site media. This statement should be reworded to state that with the exception of lead, there does not appear to be a well-defined spatial distribution of metals detected *above background values and ecological screening values* in any site media. Metals were detected in all of the surface soil/depositional soil samples; however, concentrations do not exceed background or ecological screening values. Making this change will help to avoid confusion for the reader.**

**Response:**

Agree. The text will be revised to incorporate the understanding that statement should be reworded to state that with the exception of lead, there does not appear to be a well-defined spatial distribution of metals detected *above background values and ecological screening values* in any site media.

**DRAFT ENVIRONMENTAL BASELINE SURVEY  
FOR THE  
CHEMICAL DEFENSE TRAINING FACILITY  
PARCELS 126Q, 62(2), 59(7), AND 104(7)  
FORT MCCLELLAN, CALHOUN COUNTY, ALABAMA  
RESPONSE TO COMMENTS BY FORT MCCLELLAN**

**Comment 1:**           **Figure 1-2 and page 1-3, line 5: The Filter Pad Building is incorrectly listed as 4489, should be 4479.**

**Response:**           The filter pad will be referenced as Building 4479 throughout the document including tables and figures as FTMC suggests. Figures 1-2, 3-1, 4-1, and 4-2 and Section 1.3 were changed for the Final report.

**Comment 2:**           **Page 1-3, lines 10-11: The Facility Storage Building was not built during the initial construction of the CDTF but in 1998.**

**Response:**           The text will be revised to incorporate this change.

**Comment 3:**           **Page 1-3, line 38: Wrong building numbers are used. “(4482)” after Filter Pad Building should be moved to immediately after Training Building. “(4479)” should be inserted after Filter Pad Building.**

**Response:**           The filter pad will be referenced as Building 4479 throughout the document including tables and figures as FTMC suggests.

**Comment 4:**           **Page 3-1, line 14; page 3-8, line 11 and cover sheet, Appendix H: Information on pages 3-1, 3-8 and cover sheet for appendix H indicates air monitoring was done in Building 4484 however the documentation in appendix H shows the air monitoring done in the training building bays which are in Building 4482.**

**Response:**           Appendix H was provided to IT by the U.S. Army Chemical School. The information, with regards to the building number, is probably incorrect as stated in the letter. However, IT has no way of correcting Appendix H. A statement that includes a description of the discrepancy will be added to Section 3.8. The reference to the building number will be revised throughout the text (Table of Contents, Executive Summary, Sections 1.2, 3.1, 3.8, 5.6, and the Appendix H title page).

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RESPONSE TO COMMENTS BY USACE, MOBILE DISTRICT**

*Reference: Comments by Michael H. Thompson.*

**Comment 1:** Analytical data should be compared to industrial site specific Screening Level (SSSLs) rather than residential SSSLs. The site is currently industrial and the reuse will not change after transfer.

**Response:** The site was compared against the most conservative SSSLs, the residential values. Since the data passed screening against the most conservative values, the site is cleared for any of the reuse scenarios.

**Comment 2:** The text should make a stronger statement regarding Chemical Warfare material (CWM) being contained within the Training Building so the reader understands that there have been no CWM releases outside the Training Building, and therefore, no reason to sample for CWM or breakdown products in soils or water.

**Response:** Agree. The text will be revised to incorporate this. Section 1.3 (1<sup>st</sup> and 3<sup>rd</sup> paragraphs) and the last paragraph of Section 2.0 were changed for the Final report.