UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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June 8, 2001

EMAIL & US MAIL

4WD-FFB

Mr. Ron Levy
BRAC Environmental Coordinator
U.S. Army Garrison
Environmental Office
Building 215, 15th Street
Fort McClellan, AL 36205-5000

SUBJ: Final Site Investigation Report for the Former Waste Chemical Storage Area, Parcels 87(7), 10(7), and 135(7)
Final Decision Document for the Former Waste Chemical Storage Area, Parcels 87(7), 10(7), and 135(7)
Fort McClellan

Dear Mr. Levy:

The Environmental Protection Agency (EPA) has reviewed and approves the subject documents. We look forward to receipt of the Land Use Control Implementaion Plan (LUCIP). Thank you for your cooperation. If you have any questions, please call me at (404) 562-8549.

Sincerely,

Doyle T. Brittain
Senior Remedial Project Manager

cc: Lisa Kingsbury, Ft. McClellan
Ellis Pope, USA/COE
Phil Stroud, ADEM
Jeanne Yacoub, IT
Daniel Copeland, CEHNC-OE-DC
Maj. Wayne Sartwell, ALANG
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ADEM

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November 28, 2001

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

RE: **ADEM Review and Concurrence:** *Final Site Investigation Report* and *Decision Document for the Former Waste Chemical Storage Area, Parcels 87(7), 10(7), and 135(7)* dated May 2001, Fort McClellan, Calhoun County, Alabama
Facility I.D. No. AL4 210 020 562

Dear Mr. Levy:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the subject *Final Site Investigation Report* and the Army's *Decision Document for the Former Waste Chemical Storage Area, Parcels 87(7), 10(7), and 135(7)* dated May 2001 for Fort McClellan.

The subject documents were discussed during the Base Realignment and Closure Team (BCT) on-board review meeting on January 10, 2001. During the BCT on-board review meeting, the Department provided its comments on both documents in an interactive manner such that the Army and BCT stakeholders could jointly resolve the Department's comments. The Department's comments are noted in the documented minutes of this meeting. Also, an Alabama National Guard Sites Environmental Status Update Meeting was held at Fort McClellan in Anniston, Alabama on April 25, 2001 to discuss the status of the Former Waste Chemical Storage Area, Parcels 87(7), 10(7), and 135(7). The Army (Fort McClellan), Huntsville U.S. Army Corps of Engineers (USACE), U.S. Training and Doctrine Command (TRADOC), Alabama Army National Guard (AL-NG-CFMO), National Guard Bureau (NGB), U.S. Army Center for Health Promotion and Preventive Medicine (USCHPPM), and IT Corporation (IT) attended the meeting. ADEM and EPA were not invited to the April 25, 2001 meeting. However, the meeting was successful in presenting ADEM and EPA's concerns.

An overview of the discussion that took place during the January on-board-review meeting is presented below. The following is a paraphrased narrative of the meeting minutes issued by IT on January 10, 2001:

> *<u>Former Waste Chemical Storage Area: Parcels 87(7), 10(7), and 135(7)</u>- Issues concerning the Waste Chemical Storage Area are presented below:*
>
> - *Arsenic (112 milligram per kilogram [mg/kg]) exceeded established site-specific screening level (SSSL) (0.426 mg/kg) in one surface sample (WCS-87-GP03).*

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- *Dioxin was detected in several surface and subsurface soil samples. 2,3,7,8-TCDD (0.000018 mg/kg) exceeded SSSL (0.0000042 mg/kg) at one location (WCS-87-DEP02). However, the TCDD concentration is below groundskeeper and construction worker SSSLs.*
- *Polynuclear aromatic hydrocarbons (PAHs) exceeded SSSLs and background at a few locations; however, most of the site (all three parcels) is asphalt paved.*
- *High turbidity in groundwater samples caused elevated metals results.*
- *Two anomalies (potential USTs) at Parcel 135(7) were identified with geophysics. The anomalies were investigated using exploratory trenching/excavation; however, no USTs were found.*

Although the site is located within the Alabama Army National Guard enclave and is projected for industrial land use, the soils and groundwater analytical data were screened against residential human health SSSLs to evaluate the site for possible unrestricted land reuse.

The PAHs are most likely the result of anthropogenic activities (i.e., asphalt) and do not appear to be related to site operations (IT Corporation (IT), March 2000, ***Final Human Health and Ecological Screening Values and PAH Background Summary Report, Fort McClellan, Calhoun County, Alabama****).*

In groundwater, aluminum (one location), thallium (one location), and vanadium (eight locations), were detected at concentrations exceeding both SSSLs and to establish range of background values (Science Application International Corporation (SAIC), July 1998, ***Final Background Metals Survey Report, Fort McClellan, Alabama****). However, the elevated metals concentrations are believed to be a result of high turbidity at the time of sample collection and are not related to site activities. A resampling effort was conducted in July 2000 (see Appendix J of the Site Investigation Report) to evaluate the effect of turbidity on metals concentrations in groundwater at Fort McClellan. The results of the low-flow resampling study showed that there was a decrease in metals concentrations and all results were found to be below screening levels and/or range of background. The results of the resampling study suggests that the high metals concentrations detected at the Former Waste Chemical Storage Area were a result of high turbidity.*

Metals (including low flow sampling results), semivolatile organic compounds (SVOCs), pesticides, and herbicides were detected in site media (primarily surface and depositional soils) at concentrations exceeding ecological screening values (ESVs). However the potential impact to ecological receptors is expected to be minimal based on the limited existing viable habitat and present and anticipated future site conditions. The site is covered with asphalt pavement and concrete building foundations with limited grass areas, and is projected for continued industrial use by the Alabama Army National Guard. Viable ecological habitat is presently limited and is not expected to increase in the future land use scenario.

Because of the presence of elevated arsenic concentrations in soil beneath the Building 598 concrete foundation, the U.S. Army will develop a Land Use Control Implementation Plan (LUCIP) that outlines the restrictions to be placed on future site activities and land use at this site. Prior to the site investigation activities, all three parcels comprising the Former Waste Chemical Storage area were identified as Category 7 (Environmental Science and Engineering, Inc. (ESE), 1998, ***final Environmental Baseline Survey, Fort McClellan, Alabama****, prepared for the U.S. Army Environmental Center, Aberdeen Proving Ground, Maryland, January). As a result of this study, the Army has re-categorized Parcels 87(7) and 10(7) as Community Environmental Response Facilitation Act (CERFA) Category 4 parcels. Category 4 parcels are areas where release, disposal, and/or migration of hazardous substances has occurred, and where all removal or remedial actions to protect human health and the environment have been collected. Parcel 135(7) is re-categorized as a CERFA Category 3 parcel. Category 3 parcels are areas where release, disposal, and/or migration of hazardous substances has occurred but where contaminations may not warrant removal or remedial response actions if institutional controls are believed to be adequate to protect human and ecological health. The BCT recommended "No Further Action (NFA) with land-use controls" because of arsenic contamination in surface soil at parcel 135(7).*

The presence of elevated arsenic levels in the soil beneath the concrete foundation of the former Building 598, Parcel 87(7), does not currently pose a risk to human health and the environment under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); but if the concrete foundation were removed, there is the potential for that risk to exist. As agreed to in the December 2000 Memorandum of Agreement (MOA), Land Use Control Assurance Plan (LUCAP), between the EPA, ADEM, Army, and the Joint Powers Authority (JPA), a Land Use Controls Implementation Plan (LUCIP) should be prepared to address the potential for risk to human health and the environment should the concrete foundation be removed.

As discussed in the January 10, 2001 meeting and as presented in the Final Site Investigation Report and accompanying Decision Document, the Army will develop a LUCIP for the site to protect human health and the environment. The Department understands that this Decision Document is an Army-lead document under the signatory approval of the Army. However, the Department concurs with the BCT's recommendation that this site warrants a LUCIP that will be protective of both human health and the environment. The pending LUCIP must comply with relevant federal, and state regulations.

For any questions or concerns regarding this matter please contact Mr. Philip Stroud at 334-270-5646 or via email at pns@adem.state.al.us.

Sincerely,

Stephen A. Cobb, Chief
Hazardous Waste Branch
Land Division

SAC/ps

cc: Mr. Doyle Brittain/EPA Region 4
Mr. Ellis Pope/USA COE, Mobile District
Mr. Jim Grassiano/ADEM
Mr. Mark Harrison/ADEM

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