

## **RESPONSE TO COMMENTS**

**Response to Alabama Department of Environmental Management Comments  
Draft Site Investigation Report  
Former Range 40, Parcel 94Q and Range, Choccolocco Corridor, Parcel 146Q  
Fort McClellan, Calhoun County, Alabama  
Dated April 22, 2003**

---

*Comments from Stephen A. Cobb, Chief, Governmental Hazardous Waste Branch, Land Division, dated November 21, 2003.*

***Specific Comments***

**Comment 1:**     **The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort McClellan's *Draft Site Investigation Report* regarding Parcels 94Q and 146Q in the Choccolocco Corridor. ADEM concurs with the overall content and intent of the submittal. However, ADEM and EPA have some comments that warrant future attention. These comments are provided below for your review.**

**After conducting the site investigation for these two parcels, Fort McClellan concluded that a remedial investigation (RI) was warranted. ADEM and EPA agree that further investigation is appropriate and warranted at this time. Fort McClellan has already submitted an RI workplan to ADEM addressing several parcels located in the Choccolocco Corridor, including Parcels 94Q and 146Q. The RI Work Plan is currently under review by the Department.**

**Both parcels were reportedly used only as small-arms ranges. The report states that the most significant contaminant of potential concern is lead. As with several other ranges at Fort McClellan, the presence of lead bullets and bullet fragments must be resolved with regard to human and ecological risk.**

**ADEM notes that the figures presented in Section 5.0 provide analytical data up to eight significant digits for SSSL values. The number of significant digits should be consistent and reasonable. Otherwise, the data are more difficult to read and compare. Please avoid this practice in the future.**

**The Department understands that Fort McClellan conducted an Ordnance and Explosive (OE) Engineering Evaluation/Cost Analysis for the Charlie Area, which includes the Choccolocco Corridor. At this time, UXO matters remain unresolved in this area and will be addressed during ADEM's review of the related workplans and reports for this area.**

**Response to Alabama Department of Environmental Management Comments  
Draft Site Investigation Report  
Former Range 40, Parcel 94Q and Range, Choccolocco Corridor, Parcel 146Q  
Fort McClellan, Calhoun County, Alabama  
Dated April 22, 2003**

---

**Response 1:** Comments noted. The figures in Chapter 5.0 were revised to show an appropriate number of significant digits.

**Response to U.S. Environmental Protection Agency Comments**  
**Draft Site Investigation Report**  
**Former Range 40, Parcel 94Q, and Range, Choccolocco Corridor, Parcel 146Q**  
**Fort McClellan, Calhoun County, Alabama**  
**April 2003**

---

*Comments from Doyle T. Brittain, Senior Remedial Project Manager, dated May 29, 2003.*

***Overall Comments***

**Comment 1:** A review of the ecological risk sections of this document was performed and the recommendation that a remedial investigation be conducted at this site is appropriate. As with other ranges at Ft. McClellan, the issue of bullet fragments present in any areas of the site must be resolved with regard to ecological risk.

**Response 1:** Comment noted.

**Comment 2:** Figures showing analytical results show up to 8 significant digits for the SSSL values. This is not really appropriate and makes the values difficult to read and compare. The number of significant figures should be consistent and defensible.

**Response 2:** Agree. The figures were revised accordingly.

***Specific Comment***

**Comment 1:** Appendix A. The reason for using chain of custody forms is to be able to reconstruct the custody of the samples from the time of sample collection until time of receipt by the analytical laboratory. This is accomplished by signatures at the appropriate location on the appropriate forms. The sampling records in this appendix will not allow for the reconstruction of the COC for the following reasons.

- On all but six of the sample collection logs (SCLs), the sampling team members printed their name, not signed as is required by the guidance. Anyone can print someone else's name.
- On the remaining six of the SCLs, the sampling team members were identified by initials.
- The name of the person who signed the relinquished block on all of the chain of custody (COC) forms do not appear on the sample collection logs.
- On one of the COC forms the relinquished by block contains a printed name, not a signature.
- On seven of the COC forms the received by blocks contain printed

**Response to U.S. Environmental Protection Agency Comments**  
**Draft Site Investigation Report**  
**Former Range 40, Parcel 94Q, and Range, Choccolocco Corridor, Parcel 146Q**  
**Fort McClellan, Calhoun County, Alabama**  
**April 2003**

---

**names, not signatures.**

**Response 1:** Disagree. The main thrust of the reviewer's comment regards chain of custody yet the first two bullets above address irregularities with the sample collection logs (SCL). Chain of custody is documented on the COC form as noted by the reviewer in the comment. While Shaw agrees that the SCLs should have been thoroughly completed as a matter of course, the irregularities therein do not invalidate the chain of custody because that is not their purpose.

With regard to the third bullet, Shaw followed the procedures outlined in Section 6.1.7.1 *Field Custody Procedures* presented in the *Draft Installation-Wide Sampling and Analysis Plan*, Revision 3, February 2002 (SAP). This sections states, "The sampling team, sample coordinator, and site manager will maintain overall responsibility for the care and custody of the samples until they are transferred or properly dispatched to the on-site screening facility and/or fixed-based laboratory." In addition, SAP Section 6.1.7.2 *Transfer of Custody and Shipment* states, "General custody of the sample will be maintained by the sample collection team members from the time of collection in the field through preparation and shipment to the laboratory. The main custody transfer will occur when the sample shipment is received into the laboratory from the field and is documented." Similar language is also provided in the QAP.

Using these two sections as guidance, all Shaw field personnel who are responsible for the collection of field samples (which includes the sample coordinator and the site manager) were considered part of the "sample team." No custody transfer record was considered to be necessary among members of the same sample collection team. If another contractor, a subcontractor to Shaw, the Army, or other personnel had collected samples and transferred them to Shaw for processing or analysis, then the transfer of custody of those samples would have been formally recorded using a COC form.

Multiple sample technicians were responsible for collecting samples and completing the sample collection logs. The samples and logs were funneled to the Shaw sample coordinator, who then reviewed the documentation, inventoried all of the samples collected, and compiled a single COC record to list all the samples collected (daily) for transfer to the receiving analytical laboratories. Therefore, the sample coordinator's signature on the form represents the transfer of custody from the Shaw sample team in the field to the analytical laboratory personnel (per Section 6.1.7.2 of the SAP). Shaw believes that this is satisfactory custody

**Response to U.S. Environmental Protection Agency Comments**  
**Draft Site Investigation Report**  
**Former Range 40, Parcel 94Q, and Range, Choccolocco Corridor, Parcel 146Q**  
**Fort McClellan, Calhoun County, Alabama**  
**April 2003**

---

transfer documentation and, therefore, does not agree this indicates that sample custody was not maintained as stated in the comment. Shaw personnel followed the same chain-of-custody procedures that have been in effect since the beginning of the FTMC project in 1998. It is perplexing that until now these issues have never been called into question.

However, in light of recent comments received by EPA, Shaw has changed its COC procedures to include a separate COC for each sample collection team. Each sample collection team will submit samples, COCs, and SCLs to the sample coordinator. The SCLs and COCs will be reviewed by the sample coordinator prior to taking possession of the samples and signing the COC. This process will be repeated for each sample collection team in the field. The COCs will then be copied for the field records and maintained onsite. The original forms will be transmitted to the office for filing in the project central files. In future reports, this appendix will include all "supplementary" sample team COCs to document intra-team custody transfers and all SCLs.

Regarding the last two bullets: Is EPA implying that someone's "signature" can only be made through cursive writing? If an individual signs a document and is willing to affirm that the signature is indeed their own unique mark, then the manner in which that signature is made and the form that signature takes are irrelevant. For the reviewer's information, the "Relinquished By" block on all of the COCs contained cursive-written signatures.