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Alabama Department of Environmental Management
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June 26, 2008

PCDR \ PCDR3 \ FORT RUCKER
\ 080408 \ FRK080174

U.S. Army Aviation Center - Fort Rucker
ATTN: IMSE-RCK-PWE (Mr. Jim Swift)
Fort Rucker, AL 36362

**RE: ADEM Concurrence: Draft Final Ash Delineation and Characterization
Report for Area of Concern (AOC)-S.**

Dated May 27, 2008

U. S. Army Aviation Center - Fort Rucker
Fort Rucker, Alabama
EPA I.D. No. AL6 210 020 776

Dear Mr. Swift:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort Rucker's submittal of the above referenced Ash Delineation and Characterization Report for Area of Concern AOC-S. AOC-S is located west of and adjacent to Solid Waste Management Unit (SWMU)-8, a closed ash landfill comprising approximately 4.3 acres along the southern boundary of Fort Rucker.

To delineate the horizontal and vertical extent of ash at AOC-S, 30 Direct Push Technology (DPT) soil borings were drilled in January, 2008. A total of 20 ash samples were collected and analyzed for ADEM Division 13 Appendix I Volatile Organic Compounds (VOCs) and metals. Ash was observed in 19 of the 30 DPT soil borings. Ash was observed to a depth of 14-ft below ground surface (bgs), with thicknesses ranging from one to 10-ft. Ash covers approximately 11.5 acres.

All concentrations of Appendix I metals and VOCs were compared to EPA Region IX Residential Preliminary Remediation Goals (PRGs) with the exception of arsenic which was compared to a Residential cleanup level of 40-mg/kg established by the U.S. Environmental Protection Agency (USEPA) Region IV in 2004. All metals and VOCs detected in the ash fill were at levels below Residential PRGs. In underlying soil, all metals and VOCs detected in the ash fill, with the exception of Vanadium, were detected at levels below Residential PRGs. Vanadium was detected in two of 19 locations sampled at (113-mg/kg and 79.4-mg/kg) slightly exceeding the Residential PRG of 78-mg. The elevated concentrations of vanadium are significantly below the Migration to Soil Screening Level of 300-mg/kg, as well as the Industrial PRG of 1,000-mg/kg.

Based on the level of investigation and acceptable levels of Appendix I constituents detected in the ash and underlying soil, the Department concurs with the Army's assertion that no further ash delineation and characterization at AOC-S is warranted.

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Mr. Jim Swift
June 26, 2008

For any questions or concerns regarding this matter, please contact Mr. Mark Harrison at 334-270-5610 or via email at mdharrison@adem.state.al.us.

Sincerely,

A handwritten signature in black ink, appearing to read "S.A. Cobb". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

Cc: Mr. Rick O'Donnell/USAEC
Mr. Bill Woodall/USACE-Mobile
Mr. John Johnston/EPA
Mr. Mark Sherrill/CH2MHill
Mr. Bob Barnwell/ADEM
Mr. Wesley Edwards/ADEM