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ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 36130-1463 • 1400 COLISEUM BLVD. 36110-2059

MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US

(334) 271-7700

ONIS "TREY" GLENN, III, P.E.
DIRECTOR

BOB RILEY
GOVERNOR

November 23, 2005

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

Facsimiles: (334)

Administration: 271-7950
General Counsel: 394-4332
Communication: 394-4383
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-6131
Laboratory: 277-6718
Mining: 394-4326

RE: ADEM Review and Comment: *Final Site Inspection Report for Inactive Ranges at Fort Rucker*

Dated May 12, 2005

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 the U.S. Army Corps of Engineers (USACE or Corps) May 12, 2005 (received by ADEM on September 1, 2005) submittal of the above referenced Final Site Inspection (SI) Report. The subject document presents the Corp's various proposed/ongoing investigative activities pertaining to the Military Munitions Response Program (MMRP) being conducted at Fort Rucker.

The inactive ranges being investigated by MPI in the MMRP include the following:

- Anti-Tank Rocket/Grenade Range
- Infiltration/Grenade Range
- .22 Caliber Target Butt
- Grenade and Bayonet Court A
- Grenade and Bayonet Court B
- Grenade and Bayonet Court C

On March 24, 2005, ADEM, Fort Rucker, USACE, Army Environmental Command (AEC) and the Corp's contractor (Malcolm Pirnie, Inc. or MPI) held a technical project planning meeting to review the status of Corp's site investigations being conducted at Fort Rucker's inactive ranges as part of the ongoing MMRP.

Based on more comprehensive descriptions of current site conditions and historical information provided by MPI during the above referenced meeting, the Department concurred with Corp's recommendation that Grenade and Bayonet Courts A, B, and C be designated as requiring no further action (NFA).

Birmingham Branch
110 Vulcan Road
Birmingham, Alabama 35209-4702
(205) 942-6168
(205) 941-1603 [Fax]

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, Alabama 35603-1333
(256) 353-1713
(256) 340-9359 [Fax]

Mobile Branch
2204 Perimeter Road
Mobile, Alabama 36615-1131
(251) 450-3400
(251) 479-2593 [Fax]

Mobile - Coastal
4171 Commanders Drive
Mobile, Alabama 36615-1421
(251) 432-6533
(251) 432-6598 [Fax]



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Mr. Jim Swift
November 23, 2005

ADEM stated in the meeting that concurrence with the NFA designation of the three Grenade and Bayonet Courts was contingent on the inclusion of additional information, supporting the NFA recommendation, in the Final SI Report. Based on its review of Corp's submittal of the Final SI Report, the Department finds that the additional information provided during the meeting, on which ADEM based its conditional concurrence, is sufficiently addressed in the subject document.

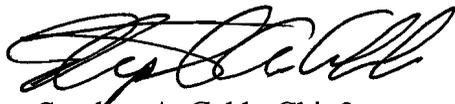
Therefore, the Department concurs, based on the Final SI Report, that an NFA designation of the three referenced Grenade and Bayonet Courts is appropriate.

The Department notes that the listed inactive ranges are also solid waste management units/areas of concern (SWMUs/AOCs) pursuant to the Alabama Hazardous Waste Management and Minimization (AHWMMA) permit. Therefore the permit must be modified (Permit Condition III.B.1) to add the six inactive ranges and to formalize the NFA remedy selection for the three referenced Grenade and Bayonet Courts.

In order to better characterize the three remaining inactive ranges being investigated at Fort Rucker (Anti-Tank Rocket/Grenade Range, Infiltration/Grenade Range, and .22 Caliber Target Butt), ADEM concurs with MPI's decision to proceed to the remedial investigation/feasibility study (RI/FS) for munitions and explosives of concern (MEC). ADEM notes that future MEC investigations may also warrant additional munitions constituent (MC) investigation. All investigations should be conducted in accordance with the latest revision of the Alabama Environmental Investigation and Remediation Guidance (A.E.I.R.G.), which may be obtained at <http://www.adem.state.al.us>.

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,



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

Cc: Mr. Ken Eisele/Fort Rucker
Mr. Jimbo Carlson/ADEM
Mr. Rick O'Donnell/AEC
Mr. Al Larkins/MPI
Mr. John Nocera/MPI

File: Land Division/DSMOA/HW/USAAC Fort Rucker/Correspondence, 2005