

**Final
Decision Document
for the LaGarde Park Site
of the former Fort McClellan,
Anniston, Alabama**

June 2006

**Submitted to:
U.S. Army Corps of Engineers
Mobile District
109 St. Joseph Street, P.O. Box 2288
Mobile, AL 36628-0001**

**Prepared by:
STEP, Inc.
1006 Floyd Culler Court
Oak Ridge, TN 37830
under
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List of Acronyms

ADPH	Alabama Department of Public Health
ALARA	as low as reasonably achievable
ATG	Allied Technology Group
BRAC	Base Realignment and Closure Commission
CERCLA	Comprehensive Environmental Response Compensation and Liability Act of 1980
CFR	<i>Code of Federal Regulations</i>
Co ⁶⁰	cobalt-60
CRP	community relations plan
Cs ¹³⁷	cesium-137
DCGL	derived cleanup guideline level
DD	decision document
DoD	Department of Defense
EPA	U.S. Environmental Protection Agency
ESE	Environmental Science and Engineering, Inc.
ESI	expanded site investigation
FUDS	Formerly Utilized Defense Site
LLRW	low-level radioactive waste
mrem	milliroentgen equivalent man (millirem)
mSv	milliSievert
NCP	National Contingency Plan
NRC	U.S. Nuclear Regulatory Commission
pCi/g	picocuries per gram
RAB	Restoration Advisory Board
STEP	Solutions To Environmental Problems, Inc.
TCRA	Time Critical Removal Action
USACE	U.S. Army Corps of Engineers
yd ³	cubic yards

1. DECLARATION

1.1 SITE NAME AND LOCATION

The John B. LaGarde Interpretive Park is located in Anniston, Alabama. The site in question is positioned on the northeast side of the park adjacent to the perimeter fence of the former Fort McClellan.

1.2 STATEMENT OF BASIS AND PURPOSE

This Decision Document (DD) presents the selected remedy for the LaGarde Park site. The remedy selected in this DD was developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendment and Reauthorization Act of 1986, and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan, also known as the National Contingency Plan (NCP). This decision is based on the Administrative Record for the former Fort McClellan and the LaGarde Park site. This document is issued by the United States (U.S.) Department of the Army, as represented by the U.S. Army Corps of Engineers (USACE) Mobile District. The term "Decision Document" has been adopted by the Department of Defense for the documentation of remedial action (RA) decisions at non-National Priorities List (NPL) Formerly Used Defense Site (FUDS) properties. The Decision Document is equivalent to the Record of Decision (ROD) required by the NCP [NCP 300.430(f)(4)(i)]. The Joint Powers Authority, the Alabama Department of Public Health (ADPH) (on behalf of the state of Alabama), and the U.S. Environmental Protection Agency (EPA) concur with the selected remedy.

Training activities at the former Fort McClellan resulted in residual soil contamination at this site. The soil contamination consisted of the radionuclides cobalt-60 (Co^{60}) and cesium-137 (Cs^{137}). A CERCLA Time-Critical Removal Action (TCRA) was conducted in September 2003 and an interim remedial action (additional soil removal) was conducted in March 2005. Confirmatory soil analysis and field radiation screening conducted at the conclusion of the interim remedial action indicated that all of the soil contamination presenting an unacceptable exposure risk to human health or the environment has been removed from the site.

1.3 DESCRIPTION OF SELECTED REMEDY

An interim remedial action (soil excavation and removal) was utilized to remove all radioactive soils and materials from the site. No further CERCLA remedial action is necessary for this site and this site can be released for unrestricted use.

1.4 STATUTORY DETERMINATIONS

The results of the field radiation screening and analyses of soil samples collected following the removal actions conducted at this site indicate that no further remedial action is warranted. This site presents no current or future risk of exposure to human health or the environment and complies with all federal and state requirements. Therefore, because the remedy employed

resulted in no "...hazardous substances, pollutants, or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure,..." [NCP 300.430(f)(4)(ii)], a five-year review will not be required for this remedial action.

1.5 AUTHORIZING SIGNATURE



Peter F. Taylor, Jr
Colonel, Corps of Engineers
Commanding

26 June 06

Date

2. DECISION SUMMARY

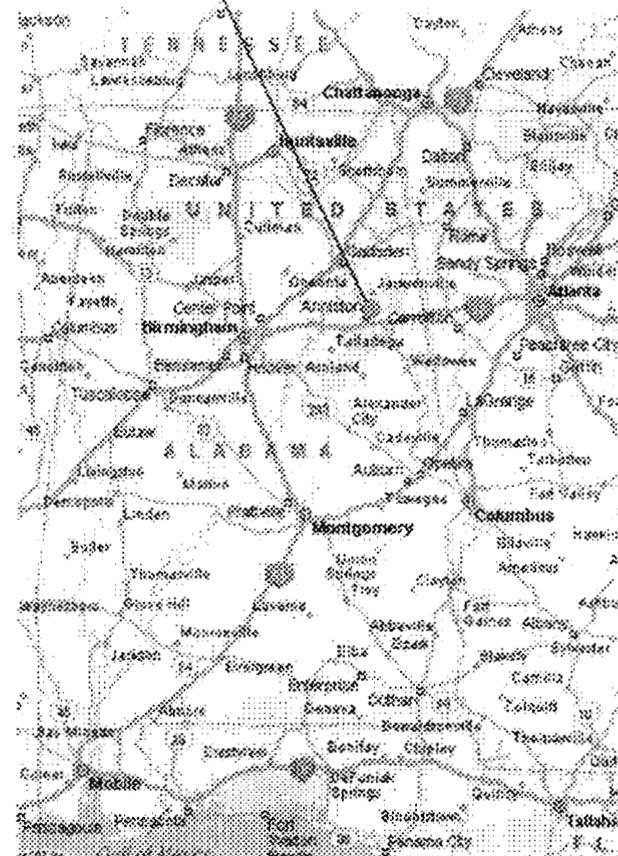
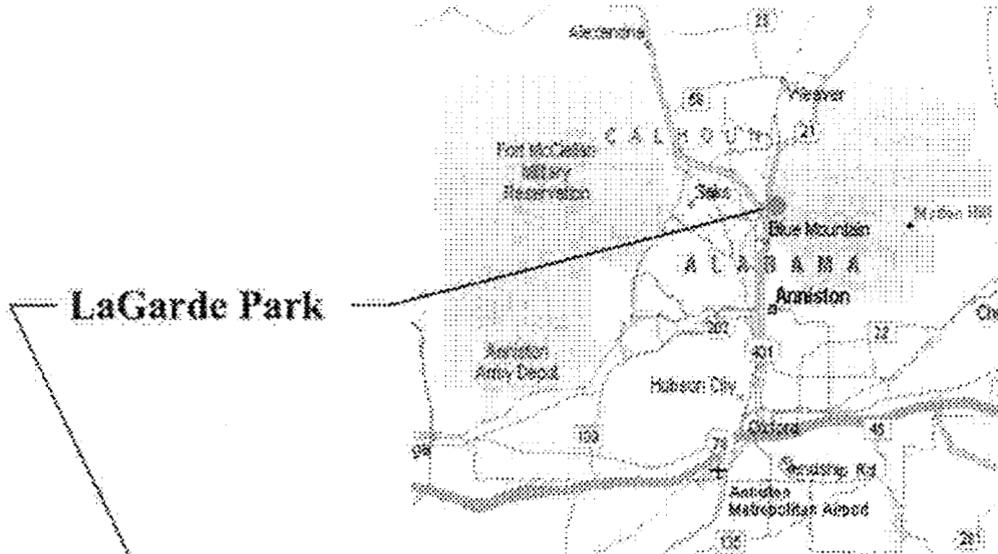
2.1 SITE NAME, LOCATION, AND DESCRIPTION

Fort McClellan is a former U.S. Army training base situated north of Interstate 20 in Anniston, Alabama, approximately halfway between Birmingham, Alabama, and Atlanta, Georgia. The John B. LaGarde Interpretive Park (a public recreational park) is adjacent to the former Fort McClellan and lies within the city limits of Anniston. The site in question is on the east side of the park adjacent to the Fort McClellan perimeter fence. Figure 2-1 shows the location of LaGarde Park and the former Fort McClellan. Figure 2-2 shows the location of the site within the park.

2.2 SITE HISTORY AND REMEDIAL ACTIONS

In the 1950s, the Department of Defense (DoD) decided to consolidate training for all branches of the military service. The United States Army, Navy, Marine, and Air Force chemical officers and non-commissioned officers, military police, civilian law officers, and various government agencies were sent to Fort McClellan for training. The U.S. Army Chemical School was established at the facility where radiation survey training was conducted for all aforementioned branches. Radioactive wastes that resulted from this training were ultimately buried on Fort McClellan property. Interviews with personnel knowledgeable about operational and waste disposal activities at various sites at Fort McClellan indicated that radioactive wastes were deposited on Iron Mountain. It was also reported that a laboratory building, consisting of cinder blocks and sand bags, was located on the "northwest side of Iron Mountain" in "Rattlesnake Gulch." This laboratory was reportedly used to prepare training "sources" of Co^{60} and Cs^{137} . At some point in the late 1960s the laboratory building was demolished, the surrounding barbed wire fence was removed, and the debris was deposited in a waste disposal area east of the building site and higher up on Iron Mountain. In 1971, a radiation survey was conducted on Iron Mountain and 22 contaminated spots were identified on the ground surface. In the summer of 1971, five containers of Co^{60} and Cs^{137} radioactive waste and 18 55-gallon drums of contaminated soils and debris were removed from the disposal area located approximately 400 feet southeast of the former laboratory site and were reportedly taken to Pelham Range for disposal. Anecdotal information indicates that building debris (i.e., concrete blocks and fencing) was included in the debris removed.

The removal area was cleared for surface military use by the Fort McClellan Health Physics Office; however, no official closeout survey was found in the records. In 1974, approximately 185 acres (which included the former "Rattlesnake Gulch" laboratory site) were deeded as a public park to the City of Anniston. This acreage was subsequently named the John B. LaGarde Interpretive Park.



Alabama

Legend

◆ Site Location

Source: Microsoft MapPoint
 Project: LaGarde Park Remedial Investigation
 Anniston, Alabama

Figure 2-1 LaGarde Park Location Map



Legend

-  Area of Investigation
-  Boundary Fence

Source: U.S. Geological Survey
Project: Remedial Investigation at
LaGarde Park, Anniston, Alabama

Figure 2-2 Location of LaGarde Park Site

The Base Realignment and Closure Act of 1988 (Public Law 100-526, 102, Statute 2623) (BRAC 88) and the Defense Base Realignment and Closure Act of 1990 (Public Law 101-510, 104 Statute 1808) (BRAC 91, 93, 95) designated more than 100 Department of the Army facilities for closure and/or realignment. In 1995, the Base Realignment and Closure Commission (BRAC) voted to permanently close Fort McClellan. The DoD closed the base in October 1999, making 45,000 acres, building facilities, and fully infrastructured property available for private sector reuse and redevelopment. At the time of closure, Fort McClellan was home to the U.S. Army Chemical School, the U.S. Army Military Police School, the Training Brigade, and the Department of Defense Polygraph Institute.

In order to terminate the Chemical School Radioactive Materials License as part of the BRAC proceedings, the U.S. Nuclear Regulatory Commission (NRC) required assurances that no radioactive material was left behind. The Army performed an aerial survey in October 2001 that indicated the presence of a radioactive "hot spot" about 100 feet outside Fort McClellan's fence line on property formerly occupied by the training site, but now within the boundaries of LaGarde Park. On February 5, 2002, a team consisting of the Chemical School's radiation protection officer, and representatives of the NRC, the ADPH Radiation Office, and EPA Region 4 visited the "hot spot" identified by the aerial survey to measure the radiation and determine the area involved. The radiation scan conducted by ADPH detected radiation exposure dose rates (assuming all radiation detected was in the form of gamma rays) in the highest areas as:

- **Surface (0 to 1 inch depth)** – 45 microRoentgen per hour ($\mu\text{R/hr}$) (approximately equivalent to 394 mrem/yr).
- **Subsurface (2 to 3 inch depth)** – 50 $\mu\text{R/hr}$ (approximately equivalent to 438 mrem/yr)
- **Subsurface (8 inch depth)** – 70 $\mu\text{R/hr}$ (approximately equivalent to 613 mrem/yr).

A concentration of 2.22 pCi/g for Co^{60} and 416 pCi/g for Cs^{137} were detected in a soil sample from the initial sampling conducted by the ADPH. The reported dose rates did not present an imminent threat given that the site was isolated and infrequently visited; however, the team recommended that excavation or removal of vegetation from the area should not be allowed. Because this property was transferred from U.S. government control to the City of Anniston in the mid-1970s, the Army classified the site as a Formerly Used Defense Site (FUDS). The USACE, Mobile District took action in 2002 under the authority of the Defense Environmental Restoration Program/FUDS and installed fencing around the site to prevent access to the area.

In February 2003 a site investigation that included surface radiation screening, vegetation sampling, and surface/subsurface soil sampling was conducted at several locations in and around the fenced perimeter. This investigation determined that the only zone of surface contamination was a relatively small area within the fenced perimeter that had Cs^{137} concentrations above the NRC screening levels. Based on the findings of the investigation, the removal of the Cs^{137} contaminated soils and associated vegetation was recommended (STEP, June 2003).

In September 2003, a CERCLA TCRA was conducted to excavate and dispose of the Cs^{137} contaminated soil and debris. Based on the site investigation findings, the estimated volume of contaminated soil to be removed was approximately 30 cubic yards (yd^3); however, a total of 170 yd^3 (approximately 238 tons) of contaminated soil was ultimately removed and shipped off site for disposal. Due to the greater than anticipated volume of contaminated soil, the TCRA was halted and an Expanded Site Investigation (ESI) was recommended to fully define the lateral and vertical extent of contamination (STEP, May 2004).

The ESI, conducted in July 2004, included a detailed surface radiation survey, collection of surface/subsurface soil samples from a regular grid array, and downhole (subsurface) radiation scanning. The ESI identified two small and isolated areas of subsurface contamination remaining. An additional interim remedial action was recommended to remove the last two areas of contamination (STEP, April 2005). Figure 2-3 presents the results of the surface radiation scan and the location of the two areas recommended for removal.

In March 2005, the final interim remedial action was conducted to remove the two remaining areas of contamination identified in the ESI. As soil was removed from the excavations, it was scanned with radiation detection instruments. Any soils scanning higher than the background gamma radiation count of 7,000 counts per minute were placed in metal low-level radiation waste (LLRW) containers for transport off-site. When excavation was complete in each of the two areas, a radiological scan of the base and sidewalls of the excavation was conducted. Soil was removed from any part of an excavation that showed elevated gamma counts (i.e., at or above background), and the area was re-scanned until the entire floor and sidewalls of each excavation were below background. As a result of field radiation screening, a total of approximately 4 yd³ (approximately 6 tons) of additional soil and debris were removed and shipped off site for disposal during the second interim remedial action.

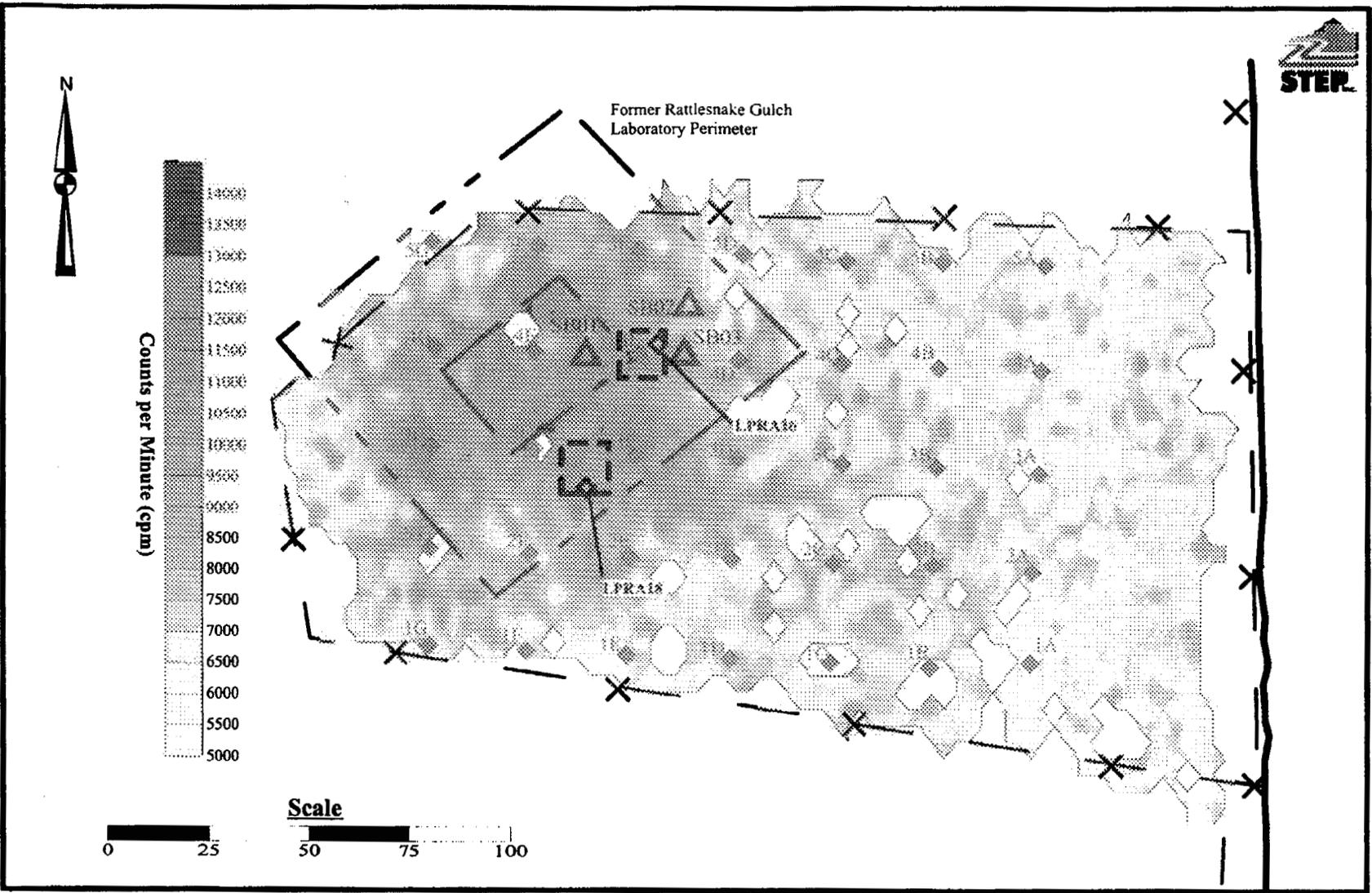
As a result of the two removal actions, a total of 174 yd³ (approximately 244 tons) of contaminated soil and debris were removed from the site. After the radiation scans indicated that all contaminated material had been removed, confirmatory soil samples were collected from each excavation. One sample was collected from the base of the excavation at each of the four corners, and one sample was collected from the center of the excavation. A total of 11 soil samples were submitted for laboratory analyses for cesium and cobalt. The highest radioactive concentrations in the soil samples were 0.228 picoCuries per gram (pCi/g) for Co⁶⁰ and 5.93 pCi/g for Cs¹³⁷. These concentrations were both detected in the same sample, collected at the base of the southeast corner of the second excavation. Figure 2-4 shows the areas excavated in both removal actions and the location and analytical results of the final confirmatory samples.

2.3 COMMUNITY PARTICIPATION

The following information was derived from the Fort McClellan Transition Force website [<http://www.mcclellan.army.mil/Default.asp>].

2.3.1 Community Relations Plan

The purpose of the community relations plan (CRP) is to facilitate effective communications and timely information exchange among various U.S. Army, federal, state, county, city and township agencies, community organizations, and the general public. The CRP outlines a specific program for establishing and maintaining community involvement in the decision-making processes for ongoing BRAC environmental activities. Fort McClellan finalized an initial CRP in 1997. Community interviews conducted in March/April 1996 assessed the public interest in Fort McClellan's environmental programs and identified issues of concern, interested individuals and groups, and potential communication methods for maintaining dialogue with the community.



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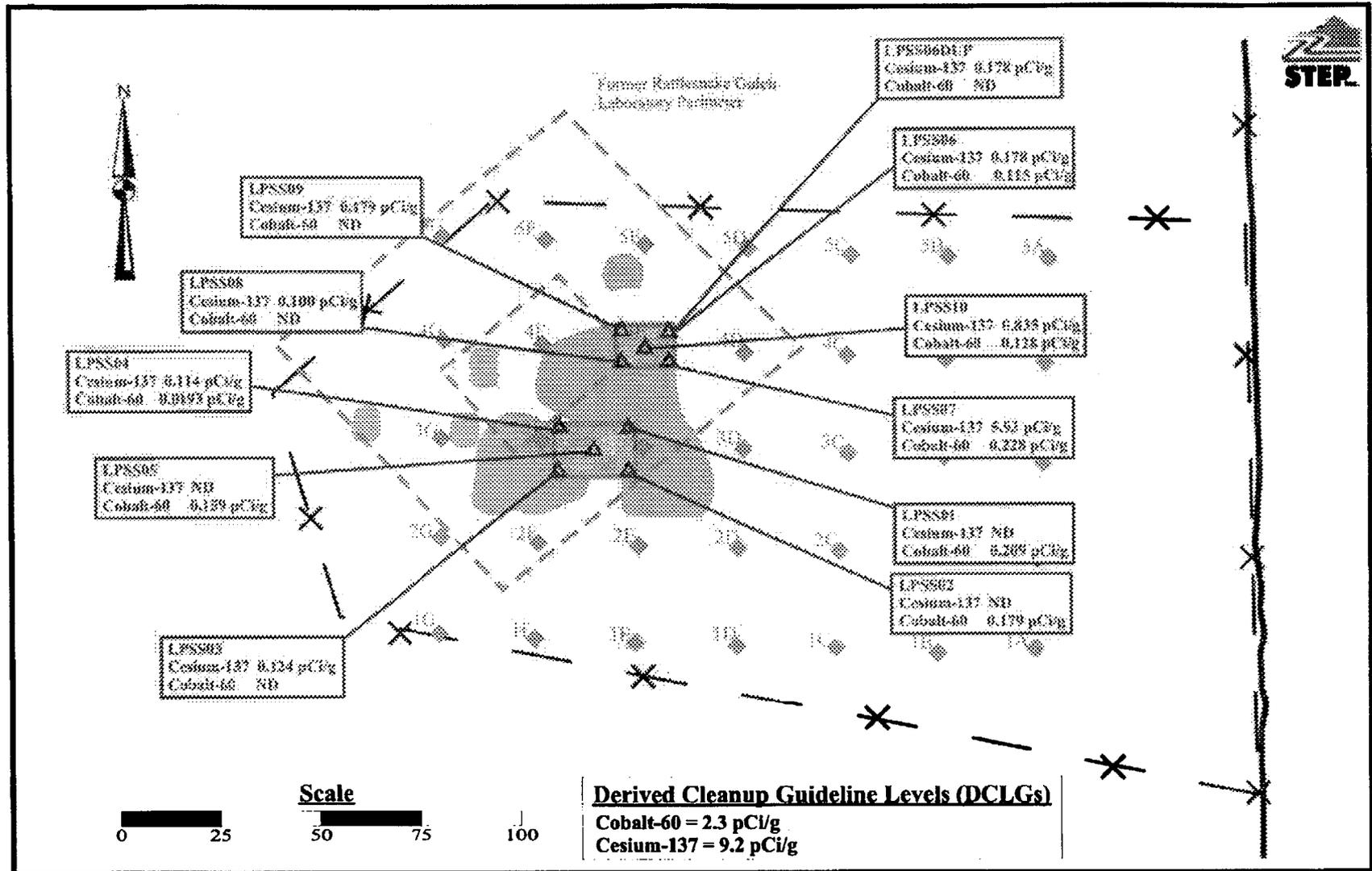
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Sample Location	Proposed removal area
Soil Boring	Remaining Locations Exceeding Screening Levels
Fence	LPR-118

Prepared By: STEP Inc. Oak Ridge, TN
 Job Title: Final Removal Action
 at La Garde Park
 Anniston, Alabama

Figure 2-3 Expanded Site Investigation Surface Radiation Survey



Legend

- △ Sample Location
- Area Excavated in 2nd Removal Action
- ▨ Area Excavated in 1st Removal Action
- ✕ Fence
- △ Confirmatory Sample Location
- pCi/g = picocuries per Gram
- ND = not detected

Prepared by: STEP Inc. Oak Ridge, TN
Job Title: Remedial Action Report
La Gade Park
Anniston, Alabama

Figure 2-4 Excavated Areas and Confirmatory Sample Results

The CRP summarizes the opinions obtained from the interviews and provides recommendations for community relations activities to ensure a proactive community outreach program. The Fort McClellan CRP was revised in 2000 and is maintained in the administrative record and the information repositories.

2.3.2 Restoration Advisory Board

The DoD has made a strong commitment to keeping citizens informed and giving communities a voice in environmental cleanup decisions. In meeting this commitment, the DoD makes information available on environmental restoration activities, provides opportunities for comment, and seeks public participation on Restoration Advisory Boards (RABs). Fort McClellan established the RAB to enable affected communities and representatives of Government agencies to meet and exchange information about Fort McClellan's environmental cleanup program. The Fort McClellan RAB meets in the Transition Force Conference Room, 291 Jimmy Parks Boulevard, Building 215, Fort McClellan, Alabama.

2.3.3 Administrative Record

In accordance with the NCP [40 CFR 300.805(a)], an administrative record file has been established for Fort McClellan. The contents of the file include a variety of written material, such as pieces of correspondence, data reports, assessments, plans, newspaper articles, notices, and fact sheets. The administrative record file also includes, but is not limited to, archive search reports, site photographs and maps, site descriptions and chronologies, reference documents, sampling and analysis data and plans, work plans, site safety and health plans, applicable or relevant and appropriate requirements, engineering evaluation/cost analyses, remedial investigation/feasibility studies, health and endangerment assessments, proposed plans for remedial action, records of decision, community relations plans, public meeting minutes/transcripts, environmental baseline studies, and findings of suitability to transfer/lease documents. The administrative record file is located at the Environmental Office in Building 251 at Fort McClellan. Copies of the file are also available at:

- **Anniston Calhoun County Public Library**
108 East 10th Street, 1st Floor
Anniston, Alabama 36201
Point of Contact: Sunny Gillespie
Telephone: (256) 237-8501, Extension 13

2.4 SITE CHARACTERISTICS

The LaGarde Park site is located on the northwest flank of Iron Mountain. The fenced area of the site covers approximately 27,000 square feet (less than ¾ acre). No areas of historical or archeological significance were identified at the site.

2.4.1 Regional Geology

The site lies within the Appalachian fold and thrust belt. Southeastward dipping thrust faults associated with minor folding are the predominant structural features. Geologic contacts generally strike northeast/southwest to north/south parallel to the faults; repetition of section is common. Geologic formations in the area range in age from Precambrian to Mississippian. On the eastern boundary of Fort McClellan, Talladega Slate crops out in a narrow band between the county line and the easternmost exposure of the Paleozoic rocks.

The Weisner formation, locally a sandstone and quartzite with thin bedded shale, is the basal formation on the unmetamorphosed sedimentary rocks. It is capped by the Shady Dolomite, followed in turn by the Rome Formation and the Conasauga Formation, all of Cambrian Age. The Shady Dolomite is a thin, gray, medium- to thick-bedded dolomite with some limestone beds. The Rome Formation is composed of shale with thin, interbedded sandstones and calcareous layers, and the Conasauga Formation is composed of interbedded limestones and shale.

2.4.2 Regional Hydrogeology

Groundwater in the area of the site occurs principally in the quartzites of the Weisner Formation in the Choccolocco Mountains and locally in lower Ordovician carbonates. Bedrock permeability may be locally enhanced by fracture zones associated with thrust faults. Shallow groundwater flow probably follows topography, with groundwater movement toward Cane Creek. Measured groundwater elevations range from 677 to 1,043 feet above mean sea level on the main post of Fort McClellan (ESE, 1998).

2.5 CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES

The site is currently contained in a public recreational park. The site is heavily wooded with hiking and mountain bike trails passing nearby. The site is, however, located at a considerable distance and elevation rise from the parking and general recreation areas of the park. There are no structures or other features to attract long term residence at the site. Because of the remote location, steep terrain, and heavy woods, the use of the site will remain the same for the foreseeable future, including the potential visits to the site by recreational users

2.6 SITE RISKS

The material from the Rattlesnake Gulch laboratory removed in 1971 was reportedly transported to the burial mound at Rideout Field, Pelham Range, Area 24C at Fort McClellan for disposal. Derived Concentration Guideline Levels (DCGLs) were developed during the remediation and decommissioning process for the Pelham Range Burial Mound (ATG, 1999). The DCGL process evaluated receptor exposures for different land use scenarios. The land use scenario that was judged to produce the greatest exposure potential was the residential scenario with backyard garden and cow. This scenario was used to evaluate the exposures from unrestricted release at the site. The computer code RESRAD 5.82 (Argonne National Laboratory, 1993) was used to evaluate the potential dose and long term risk from the scenario activities to a resident adult and resident child, and comply with Title 10 *Code of Federal Regulations (CFR) Part 20.1402.*⁵

Title 10 CFR Part 20 (*Standards for Protection Against Radiation*), Subpart E (*Radiological Criteria for License Termination*), Section 20.1402 (*Radiological criteria for unrestricted use*) states "A site will be considered acceptable for unrestricted use if the residual radioactivity that is distinguishable from background radiation results in a TEDE (total effective dose equivalent) to an average member of the critical group that does not exceed 25 mrem (millirem) [0.25 mSv (milliSievert)] per year, including that from groundwater sources of drinking water, and that the residual radioactivity has been reduced to levels that are as low as reasonably achievable (ALARA)."

The maximum DCGLs for residual radioactive soil (i.e., Co⁶⁰ and Cs¹³⁷) determined by the computer code RESRAD 5.82 which would not exceed the TEDE of 25 mrem per year allowable exposure limit were established as follows:

- **Resident Adult –**
 - Co⁶⁰ 2.9 picoCuries per gram (pCi/g) (Resulting Risk 9×10^{-5})
 - Cs¹³⁷ 12 pCi/g (Resulting Risk 3×10^{-4})
- **Resident Child –**
 - Co⁶⁰ 2.3 pCi/g (Resulting Risk 6×10^{-5})
 - Cs¹³⁷ 9.2 pCi/g (Resulting Risk 9×10^{-5})

Because the radioactive contaminants were identical and the same conservative exposure scenario applied to the LaGarde Park and Pelham Range sites, the DCGLs of 2.3 pCi/g for Co⁶⁰ and 9.2 pCi/g for Cs¹³⁷ developed for the Pelham Range Burial Mound were also selected for evaluating the radioactive soil concentrations at the LaGarde Park site.

The initial site surveys conducted by the ADPH indicated dose rates ranging from 394 to 613 mrem/yr and a concentration of Cs¹³⁷ in the soil as high as 416 pCi/g. These values exceeded the permissible radiation exposure level of 25 mrem/yr and therefore presented a potential risk to people and animals that might visit the site.

After conducting the removal actions at the site, the highest remaining radioactive concentrations of Co⁶⁰ (0.228 pCi/g) and Cs¹³⁷ (5.93 pCi/g) are well below the conservative DCGLs for surface soils that would indicate a potential exposure exceeding the allowable radiation exposure level (i.e., 2.3 pCi/g for Co⁶⁰ and 9.2 pCi/g for Cs¹³⁷). In addition, these detections are located 10 feet below ground surface and are covered with clean soil backfill to grade.

The results from verification surface surveying and sampling performed by ADPH, EPA, and the NRC, confirm that the current radiation levels at the surface are well below the permissible NRC radiation exposure levels and the DCGLs established for the site. Therefore, Co⁶⁰ and Cs¹³⁷ do not present a current or future risk to human health or the environment, and no further remedial action is recommended for the site.

2.7 DOCUMENTATION OF SIGNIFICANT CHANGES

No significant changes to the proposed remedy of "No Further Action" for the site have occurred.

3. RESPONSIVENESS SUMMARY

3.1 STAKEHOLDER ISSUES AND LEAD AGENCY RESPONSES

No comments were received from stakeholders or regulatory agencies on the proposed remedy during the public comment period.

3.2 TECHNICAL AND LEGAL ISSUES

No outstanding legal or technical issues were identified with the proposed remedy.

4. REFERENCES

- ATG (Allied Technology Group), September 1999. *Burial Mound Decommissioning Plan, Fort McClellan, Alabama.*
- ESE (Environmental Science and Engineering Inc.), January 1998. *Final Environmental Baseline Survey, Fort McClellan, Alabama.*
- EPA (U.S. Environmental Protection Agency), January 2001. *10 Code of Federal Regulations Part 20 Section 1402.*
- EPA, July 1999. *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents (EPA 540-R-98-031).*
- NRC (U.S. Nuclear Regulatory Commission), March 2000. NRC Inspection Report No. 01-12861-05/99-01.
- NRC, August 2000. *Multi-Agency Radiation Survey and Site Investigation Manual, NUREG-1575, Revision 1.*
- NRC Office of Nuclear Material Safety and Safeguards (NMSS), September 2002. *Final Consolidated NMSS Decommissioning Guidance – Volume 1 Decommissioning Process (NUREG 1757).*
- NRC, August 2003. NRC Inspection Report No. 01-02861-05/03-01.
- STEP (Solutions To Environmental Problems, Inc.), June 2003. *Final Completion Report Site Investigation at LaGarde Park Anniston, Alabama.*
- STEP, May 2004. *Final Report for Removal Action at LaGarde Park Anniston, Alabama.*
- STEP, June 2004. *Final Project Plans, Expanded Site Investigation at LaGarde Park Anniston, Alabama.*
- STEP, April 2005. *Final Remedial Investigation Report, Expanded Site Investigation at LaGarde Park Anniston, Alabama.*
- STEP, November 2005. *Final Remedial Action Report, Final Interim Removal Action at LaGarde Park, Anniston, Alabama.*
- Transition Force, United States Army Garrison, Fort McClellan, Alabama (website)
[<http://www.mcclellan.army.mil/Default.asp>]
- USACE (U.S. Army Corps of Engineers), May 2004. *Formerly Used Defense Sites (FUDS) Program Policy (ER 200-3-1).*