



## *McClellan Development Authority*

October 7, 2011

Mr. Stephen A. Cobb  
Alabama Department of Environmental Management  
Chief, Governmental Hazardous Waste Branch Land Division  
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Mr. Tom Lederle  
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**Subject: Response to ADEMs Comments dated September 29, 2011 and Replacement Pages for the 2010 Land Use Control Effectiveness Report (LUCER) dated March 2, 2011**

Dear Mr. Cobb and Mr. Lederle:

Enclosed are the McClellan Development Authority's (MDA's) responses to the Alabama Department of Environmental Management's (ADEM's) comments dated September 29, 2011 on the 2010 Land Use Control Effectiveness Report dated March 3, 2011. Replacement pages are enclosed to address the comments as requested.

ADEM notes a discrepancy related to monuments and signs at the Fill Area North of Landfill 2 in that there is no mention of installation of these features at the Landfill. The corrective measures scheduled to be conducted at the Fill Area North of Landfill 2 are shown in the Corrective Measures Implementation Plan (CMI Plan) for Landfill 1, Parcel 78(6); Landfill 2, Parcel 79(6); Former Post Garbage Dump, Parcel 126(7); Fill Area East of Reilly Airfield, Parcel 227(7); and Fill Area North of Landfill 2, Parcel 230(7) dated January 2008. To date the procedures identified in the CMI Plan have not been completed because the site, which is in the Alpha Area within the vicinity of Munitions Response Site 13 (MRS-13), requires the remediation of munitions and explosives of concern (MEC) before the activities at the Fill Area North of Landfill 2 can be performed. CMI Plan activities including the installation of monuments and signs will be implemented and documented in accordance with the CMI Plan pending completion of MEC clearance in MRS-13 and funding of the planned activities. Until such time that the MEC clearance and CMI Plan activities are complete, access to the fill area is controlled using the locked gates at the Alpha Area boundary. The text in Section 2.7 has been revised and replacement pages (text pages 5 through 9 and Table 1) are enclosed with this submittal.

ADEM also requested information about the inspection of signs installed at the landfills and fill areas. Inspections at the subject Landfills and Fill Areas are conducted annually in October. In October 2010, signs had not yet been posted. This is documented in MES' December 2, 2010 response to ADEM's September 3, 2010 comments related to the Draft Corrective Measures Implementation Report for Landfill 1, Parcel 78(6); Landfill 2, Parcel 79(6); Former Post Garbage Dump, Parcel 126(7); and Fill Area East of Reilly Airfield, Parcel 227(7), dated February 2010. Response to General Comment 1 indicates the signs for the aforementioned landfills and fill areas were scheduled to be installed as weather permits. Installation of the signs at Landfill 1, Landfill 2, Landfill 3, Fill Area Northwest of Reilly, Former Post Garbage Dump, and the Fill Area East of Reilly Airfield was completed in January 2011 after the 2010 LUCER reporting period and will be inspected during the upcoming 2011 inspections. The cap inspection forms will be modified to include the inspection of signs prior to conducting the 2011 landfill and fill area inspections. No signs were installed at the Fill Area North of Landfill 2 for the reasons discussed above.

Two hard copies of this letter and the 2010 LUCER replacement pages have been provided to Mrs. Brandi Little. Please contact me at (256) 236 - 2011 if you have any questions or require further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'R Scott', with a stylized flourish at the end.

Robin Scott  
Executive Director

cc: Richard Satkin - Matrix Environmental Services (MES)  
Roger Hall - MES  
Scott Bolton-Transition Force  
McClellan Development Authority File Copy  
MES File Copy

# **Land Use Control Effectiveness Report - 2010**

## **McClellan Anniston, Alabama**

**Prepared for:**

**McClellan Development Authority**



**Prepared by:**



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**March 2011**

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                         and Garbage Dump and Fill Area East of Reilly
- Appendix C     *2010 Annual Closure System Report, Landfill 3, Parcel 80(6) and Fill Area  
                         Northwest of Reilly Airfield, Parcel 229(7)*

## **ACRONYMS**

ADEM	Alabama Department of Environmental Management
Army	United States Department of the Army
BMP	Best Management Practice
CA	Cleanup Agreement
Deed 13	Early Transfer Quitclaim Deed 13
ESCA	Environmental Services Cooperative Agreement
FOSET	Finding of Suitability for Early Transfer
GSA	General Services Administration
JPA	Anniston-Calhoun County McClellan Development Joint Powers Authority
LUC	Land Use Control
LUCER	Land Use Control Effectiveness Report
LUCIP	Land Use Control Implementation Plan
Matrix	Matrix Environmental Services, LLC
MDA	McClellan Development Authority
MDA security officer	Matrix security contractor
MEC	Munitions and Explosives of Concern
ROW	Right-of-way

## 1.0 INTRODUCTION

This 2010 Annual Land Use Control Effectiveness Report (LUCER) has been prepared by Matrix Environmental Services, LLC, (Matrix) on behalf of the McClellan Development Authority (MDA) to document the effectiveness of land use controls (LUCs) on certain parcels at McClellan owned by the MDA and for which the MDA is responsible for LUC enforcement. This report is intended to satisfy the requirements stipulated in the Cleanup Agreement (CA) between the Alabama Department of Environmental Management (ADEM) and the MDA, dated September 30, 2003 and amended November 2005; and the Environmental Services Cooperative Agreement (ESCA) between the United States Department of the Army (Army) and the MDA's predecessor entity, the Anniston-Calhoun County McClellan Development Joint Powers Authority (JPA) dated September 29, 2003, and amended in September 2005 and June 2006. In September 2007 a new ESCA was negotiated, into which the 2003 ESCA was incorporated. The 2007 ESCA was amended September 28 and 29, 2007.

On August 22, 2008, the Circuit Court of Calhoun County issued an order dissolving the JPA and charging Calhoun County with "administering all funds and fiscal operations" and taking action concerning the development of McClellan. The order transferred the JPA's responsibilities for the development and environmental remediation of McClellan to Calhoun County. Calhoun County has assumed these responsibilities as the MDA.

The CA (Section IV.C.) requires interim land use controls on certain parcels described in the Army's Finding of Suitability for Early Transfer (FOSET). These interim land use controls are further described in the Deed Notices that are attached to the Deed for the FOSET Parcels that have been transferred from the Army to the JPA (Early Transfer Quitclaim Deed, also known as "Deed 13"). The CA requires that the MDA maintain and enforce the provisions of the Deed 13 notices until investigation and corrective measures required under the CA have been completed, and final remedies implemented. This LUCER documents the enforcement of the LUCs and interim LUCs described in Deed 13, the CA, the Land Use Control Implementation Plans (LUCIPs), the *General Services Administration (GSA) Warehouse Area, Parcels 151(4), 2(4), 3(4), 4(4), 67(4), 69(4), 91(4), 111(4), 128(4), 129(4), and 238(4) LUCIP*, and the *LUCIP for Former Motor Pool Area 3100, Parcels 24(7), 25(7), 73(7), 212(7), and 146(7) and Former Washrack, Building 1740, Soldier's Chapel, Parcel 127(7)*. Table 1 presents a summary of LUCs by site/parcel.

The ESCA, Attachment E.1., Section 2.1.3 (6) requires the MDA to *"Implement, administer, and enforce LUCs. Such implementation and administration of land use controls may be evidenced by the filing by the MDA with ADEM and the Army of an annual compliance report. The report shall certify, after inspection, that all components of land use controls are in place, and reporting any apparent violations of the land use controls, and describing actions, if any, taken in response to such violations."*

This report has been prepared to fulfill the requirements specified above. The following sections describe the LUCs established for each applicable parcel, a description of the status of the LUCs, inspection summaries, and any noted violations.

## 2.0 LAND USE CONTROLS

The MDA has assumed responsibility for conducting site-wide security patrols in the Main Cantonment Area, Alpha Area, and Bravo Area. Dynamic Security, Matrix' security contractor, performed the role of MDA security officer. Daily and weekly patrol notes are recorded on inspection forms that are signed and dated by the MDA security officer. The inspection forms are filed in the LUC notebook and are retained by the MDA security officer. Examples of these forms are included in Appendix A. The inspection forms are available for review upon request. In addition to site-wide security, the MDA is responsible for enforcement of LUCs and interim LUCs at the following sites:

- Landfill 1, Parcel 78(6) (Landfill 1)
- Landfill 2, Parcel 79(6) (Landfill 2)
- Landfill 3, Parcel 80(6) (Landfill 3)
- Landfill 4, Parcel 81(5) (Landfill 4)
- Industrial Landfill, Parcel 175(5) (Industrial Landfill)
- Former Post Garbage Dump, Parcel 126(7) (Garbage Dump)
- Fill Area North of Landfill 2, Parcel 230(7) (Fill Area North of Landfill 2)
- Fill Area East of Reilly, Parcel 227(7) (Fill Area East of Reilly)
- Fill Area Northwest of Reilly Airfield, Parcel 229(7) (Fill Area Northwest of Reilly)
- Training Area T-38 Former Technical Reaction Area, Parcel 186(6) (Training Area T-38)
- Training Area T-6 (Naylor Field), Parcel 183(6) (Training Area T-6)
- Cane Creek Training Area, Parcel 510(7) (Cane Creek Training Area)
- Small Weapons Repair Shop, Parcel 066(7) (Small Weapons Repair Shop)
- Motor Pool Area 1500 and Chemical Laundry, Parcel 94(7) (Chemical Laundry)
- Former Motor Pool Area 3100, Parcels 24(7), 25(7), 73(7), 212(7), and 146(7) (Motor Pool Area 3100)
- Former Washrack, Building 1740, Soldier's Chapel, Parcel 127(7) (Soldier's Chapel)
- Reilly Lake
- General Services Administration (GSA) Warehouse Area, Parcels 151(4), 2(4), 3(4), 4(4), 67(4), 69(4), 91(4), 111(4), 128(4), 129(4), and 238(4) (GSA Warehouse Area)
- Alpha Area and Bravo Area (Multiple Parcels)
- Dog Kennel Area
- Blacktop Training Area, Parcel 511(7) and Fenced Yard in Blacktop Training Area, Parcel 512(7) (Blacktop Training Area), part of the Training Area T-5 Sites
- M1.01, M3 Miscellaneous Property and Eastern Bypass "Y" Area Junction (Golden Triangle and Y Area)
- Iron Mountain Road Ranges, Parcels 069Q, 070Q, 071Q, 075Q, 221-Q-X, 222Q-X (Iron Mountain Road Ranges)

The following sections include a parcel-by-parcel description of LUCs and/or interim LUCs as specified in Deed 13, the CA, and LUCIP. Also included are summaries of the inspections performed during 2010 and violations with associated corrective actions taken, as well as summaries of the landfill cap inspections performed in 2010.

## **2.1     *Landfill 1, Parcel 78(6)***

LUCs at Landfill 1 include a restriction on digging or disturbance of soils without ADEM approval and the installation of signs and monuments around the landfill. Signs and monuments were installed in January 2007 to alert personnel and visitors where the landfill cap was installed and that it should not be damaged. No digging was performed during 2010 nor is any anticipated in the future. A cap inspection was conducted at Landfill 1 on October 21, 2010. The cap appeared to be in good condition. Vegetation cover across Landfill 1 was thick and healthy. No signs of subsidence, erosion, or disturbances were observed. An oak tree in the center of the landfill had died and had been broken in half by the wind. However, the rootball was not exposed and the fallen tree branches did not penetrate the cap surface. The Landfill Cap Inspection Checklist Items report for the cap inspection is provided in Appendix B.

## **2.2     *Landfill 2, Parcel 79(6)***

LUCs at Landfill 2 include a restriction on residential use, a restriction on digging or disturbance of soils without ADEM approval, and installation of signs and monuments around the landfill. Residential use includes housing, daycare facilities, playgrounds, and schools for persons under age 18. Landfill 2 was not used for residential purposes in 2010, nor is residential use anticipated in the future. In the event the parcel is sold to another party, the “Notice of Non-Residential Use” will be included in the transfer deed. Signs and monuments were installed in July 2008 to alert personnel and visitors where the landfill cap is located and that it should not be damaged. No digging or soil disturbance was performed in 2010 nor is any anticipated in the future. A cap inspection was conducted at Landfill 2 on October 21, 2010. The cap appeared to be in good condition. Thick vegetation covered Landfill 2. No signs of subsidence, erosion, or disturbances were observed. The Landfill Cap Inspection Checklist Items report for the cap inspection is provided in Appendix B.

## **2.3     *Landfill 3, Parcel 80(6)***

LUCs at Landfill 3 include a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcel, unless proper safety and disposal measures as approved by ADEM are implemented. No direct contact, or consumptive or other use of groundwater occurred in 2010, and none is anticipated in the future.

The MDA has selected an *enhanced in situ* bioremediation remedy for groundwater. This remedy is not anticipated to result in additional exposure to groundwater as it is an *in situ* remedy. Ongoing groundwater sampling activities will be performed with appropriate personal protective equipment in order to prevent adverse exposure. The planned performance and compliance monitoring associated with the groundwater remedy is described in the Corrective Measures Implementation Plan for Landfill 3 Groundwater.

LUCs also include a restriction on residential use of this parcel and a restriction on digging or disturbance of soils without ADEM approval. Boundary markers were placed in 2007, and LUCs applicable to the cap have been implemented. No residential use of the parcel occurred



during 2010, and none is anticipated in the future. No digging was performed in Parcel 80(6) in 2010 nor is any anticipated in the future. However, repair of the cap on Landfill 3 included minimal soil disturbance. As per the CA and the Post-Closure Care Program for Landfill 3, cap inspection and repair work information is documented in the *2010 Annual Closure System Report, Landfill 3, Parcel 80(6) and Fill Area Northwest of Reilly Airfield, Parcel 229(7) (Landfill 3 Closure System Report)*, which is provided in Appendix C of this report. The repair and maintenance activities performed at Landfill 3 during 2010 are described in the *Landfill 3 Closure System Report*. Summaries of the quarterly cap inspections performed in 2010 and copies of the cap inspection reports are also included in the *Landfill 3 Closure System Report* in Appendix C.

#### **2.4    *Landfill 4, Parcel 81(5)***

LUCs at Landfill 4 include a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcel, unless proper safety and disposal measures as approved by ADEM are implemented; in addition there is a restriction on digging or disturbance of soils without ADEM approval, and a requirement for the installation of signs and monuments around the landfill. Monuments and signs have been installed around the landfill to alert personnel and visitors that the cap should not be damaged. No consumptive or other use of groundwater occurred in 2010, and none is anticipated in the future. With the exception of groundwater sampling associated with long-term operations and maintenance of this ADEM-approved closed landfill, no direct contact with groundwater below the parcel occurred in 2010, and none is anticipated in the future. Unless associated with cap maintenance and repair, no digging or soil disturbance was performed in 2010, nor is any anticipated in the future. A cap inspection was conducted at Landfill 4 on October 21, 2010. In September 2010, low areas along the western edge of the landfill were repaired by applying fill material, then seeding and mulching the disturbed area. Two small areas in the northeast corner of Landfill 4 were void of vegetation. No signs of erosion or exposed debris were observed. The Landfill Cap Inspection Checklist Items report for the cap inspection is provided in Appendix B.

#### **2.5    *Industrial Landfill, Parcel 175(5)***

LUCs at the Industrial Landfill include a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcel, unless proper safety and disposal measures as approved by ADEM are implemented, a restriction on digging or disturbance of soils without ADEM approval, and the installation of signs and monuments around the landfill. No consumptive or other use of groundwater occurred in 2010, and none is anticipated in the future. With the exception of groundwater sampling conducted to comply with ADEM landfill permit requirements, no direct contact with groundwater below the parcel occurred in 2010, and none is anticipated in the future. The Industrial Landfill is an actively-permitted landfill and is used by the MDA for disposal of construction debris from redevelopment activities at McClellan. Waste disposal is conducted in accordance with an ADEM-approved Landfill Solid Waste Disposal Permit #08-02. Monuments and signs were installed in conjunction with the monuments and signs placed around Landfill 4.

## **2.6    *Former Post Garbage Dump, Parcel 126(7)***

LUCs at the Garbage Dump include a restriction on digging or disturbance of soils as well as access control and the installation of signs and monuments. Signs and monuments were installed in January 2007. The Former Post Garbage Dump is east of Reilly Lake and access is controlled by locked gates that control vehicular access to Reilly Lake. These gates are checked daily and recorded on an inspection form that is signed and dated by the MDA security officer. No digging was performed in 2010 nor is any anticipated in the future. However, ADEM-approved routine maintenance and repair work on the landfill cap included minimal soil disturbance during 2010. In April and May 2010, areas with sparse vegetation were over-seeded and fertilized. A cap inspection was conducted at Garbage Dump on October 20, 2010. The cap appeared to be in good condition. No signs of subsidence, erosion, or exposed debris were observed. Areas with limited vegetation, located on the western perimeter near the entrance to the Garbage Dump were seeded and mulched. The Landfill Cap Inspection Checklist Items report for the cap inspection is provided in Appendix B.

## **2.7    *Fill Area North of Landfill 2, Parcel 230(7)***

LUCs at the Fill Area North of Landfill 2 include a restriction on digging or disturbance of soils as well as access control. No digging or soil disturbance was performed in 2010 nor is any anticipated in the future. The fill area is within the Alpha Area boundary and access is controlled by locked gates which are checked daily and recorded on an inspection form that is signed and dated by the MDA security officer. Munitions and Explosives of Concern (MEC) warning signs are posted along the perimeter of the Alpha Area which includes the Fill Area North of Landfill 2. Implementation of the cap repairs and the installation of signs and monuments in accordance with the ADEM approved Final Corrective Measures Implementation (CMI) Plan for Landfill 1, Parcel 78(6); Landfill 2, Parcel 79(6); Former Post Garbage Dump, Parcel 126(7); Fill Area East of Reilly Airfield, Parcel 227(7); and Fill Area North of Landfill 2, Parcel 230(7) dated January 2008 is pending completion of MEC clearance in MRS-13 and funding of the planned activities.

## **2.8    *Fill Area East of Reilly, Parcel 227(7)***

LUCs at the Fill Area East of Reilly include a restriction on digging or disturbance of soils as well as access control and the installation of signs and monuments. Signs and monuments were installed in January 2007. No significant digging was performed in 2010 nor is any anticipated in the future. The fill area is east of Reilly Lake and access is controlled by locked gates that control vehicular access to Reilly Lake. These gates are checked daily and recorded on an inspection form that is signed and dated by the MDA security officer. A cap inspection was conducted at the Fill Area East of Reilly on October 20, 2010. The cap appeared to be in good condition. No signs of subsidence, erosion, or exposed debris were observed. The Landfill Cap Inspection Checklist Items report for the cap inspection is provided in Appendix B.

## **2.9    *Fill Area Northwest of Reilly, Parcel 229(7)***

LUCs at the Fill Area Northwest of Reilly include a restriction on digging or disturbance of soils and the installation of signs and monuments. Boundary markers were placed in 2007, and LUCs

applicable to the cap have been implemented. During 2007, construction of a cap on the Fill Area Northwest of Reilly included the excavation and removal of waste material in conjunction with an ADEM-approved remedy for the fill area. To make way for future road construction activities, waste was excavated from the southwest portion and relocated to the north edge of the fill area. No significant digging was performed in 2010 nor is any anticipated in the future, however, ADEM-approved maintenance and repair work on the landfill cap was completed in 2010. As per the CA and the Post-Closure Care Program for Landfill 3 and the Fill Area Northwest of Reilly, cap inspection and repair work information is documented in the *2010 Annual Closure System Report, Landfill 3, Parcel 80(6) and Fill Area Northwest of Reilly Airfield, Parcel 229(7) (Closure System Report)*, which is provided in Appendix C of this report. The repair and maintenance activities performed at the Fill Area Northwest of Reilly during 2010 are described in the *Closure System Report*. Summaries of the quarterly cap inspections performed in 2010 and copies of the cap inspection reports are also included in the *Closure System Report* in Appendix C.

### ***2.10 Training Area T-38 Former Technical Reaction Area, Parcel 186(6)***

LUCs at the Training Area T-38 include a restriction on public access and a restriction barring use of the property for any purpose pending completion of characterization and any required response action. There has been no evidence of public access to Training Area T-38 during 2010. A locked gate at the entrance to T-38 prevents public access. The gate is checked daily and recorded on an inspection form that is signed and dated by the MDA security officer.

### ***2.11 Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)***

LUCs at the Training Area T-6 and Cane Creek Training Area include a restriction on public access and a restriction barring use of the property for any purpose pending completion of characterization and any required response action. In 2010, MDA-approved contractors accessed the site for sampling purposes, to install 8 air sparging wells and 8 soil vapor extraction wells, and to install the air sparging/soil vapor extraction system. There has been no evidence of unauthorized public access to Training Area T-6 during 2010. These areas abut the Bravo Area and the locked gate restricting access is checked by MDA security officers daily and recorded on an inspection form.

### ***2.12 Small Weapons Repair Shop, Parcel 66(7)***

LUCs at the Small Weapons Repair Shop include a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcel, unless proper safety and disposal measures as approved by ADEM are implemented. No consumptive or other use of groundwater occurred in 2010, and none is anticipated in the future. With the exception of groundwater sampling conducted in accordance with ongoing ADEM-approved environmental investigations at this parcel, no direct contact with groundwater below the parcel occurred in 2010.

**2.13 Motor Pool Area 1500 and Chemical Laundry, Parcel 94(7)**

LUCs at the Chemical Laundry include a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcel, unless proper safety and disposal measures as approved by ADEM are implemented. No consumptive or other use of groundwater occurred in 2010. Ongoing ADEM-approved groundwater sampling activities are performed with appropriate personal protective equipment in order to prevent adverse exposure.

**2.14 Former Motor Pool Area 3100, Parcels 24(7), 25(7), 73(7), 212(7), and 146(7)**

LUCs at the Motor Pool Area 3100 include a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcels, unless proper safety and disposal measures as approved by ADEM are implemented. No consumptive or other use of groundwater occurred in 2010, and none is anticipated in the future. Similarly, no direct contact with groundwater below the parcels occurred in 2010, and none is anticipated in the future. In 2009, the MDA entered into a lease agreement with Auburn University. The lease includes a clause that restricts Auburn University's use of Motor Pool Area 3100 to surface use only.

**2.15 Former Washrack, Building 1740, Soldier's Chapel, Parcel 127(7)**

LUCs at the Soldier's Chapel include a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcel, unless proper safety and disposal measures as approved by ADEM are implemented. No consumptive or other use of groundwater occurred in 2010, and none is anticipated in the future. In addition, no direct contact with groundwater below the parcel occurred in 2010, and none is anticipated in the future.

**2.16 Reilly Lake**

LUCs at Reilly Lake as specified in Deed 13 include restrictions on swimming, wading, fishing, or harvesting aquatic animals in the lake wetlands, and streams. In addition, Deed 13 restricts consumption of fish or other aquatic animals in the lake, streams, and wetlands. However, during a Resource Conservation and Recovery Act Facility Investigation (RFI) it was determined that constituents detected in surface water and fish tissue do not pose an unacceptable risk to human health and the environment; thereby finding the lake, wetlands, and stream suitable for swimming, wading, fishing, harvesting, and consuming aquatic animals. The RFI recommended LUCs for the Former Post Garbage Dump (Parcel 126(7)) and Fill Area East of Reilly (Parcel 227(7)) (Sections 2.6 and 2.8), however, LUCs for the Reilly Lake area were not recommended. On April 17, 2006, ADEM concurred with this recommendation. The MDA is updating Deed 13 to reflect this change.

### ***2.17 GSA Warehouse Area, Parcels 151(4), 2(4), 3(4), 4(4), 67(4), 69(4), 91(4), 111(4), 128(4), 129(4), and 238(4)***

LUCs on the GSA Warehouse Area include a restriction on the property to industrial and commercial reuse. The current proposed redevelopment plan for the GSA Warehouse Area calls for industrial and commercial uses in this area.

An additional LUC includes a restriction on the consumptive or other use of groundwater and direct contact with groundwater below the parcels, unless proper safety and disposal measures as approved by ADEM are implemented. No consumptive or other use of groundwater occurred in 2010, and none is anticipated in the future. No direct contact with groundwater below the parcels occurred in 2010, and none is anticipated in the future.

### ***2.18 Alpha Area and Bravo Area***

LUCs for the Alpha Area and Bravo Area pertain to MEC, and are intended to minimize the risk to human health and the environment, and to promote human safety. The LUCs require controlled access to the Alpha Area and Bravo Area as well as public education on the explosive hazards associated with munitions that may be present on the parcel and actions they should take should a MEC item be encountered. Gates have been installed to restrict vehicular access to these areas (Figure 1). Each gate is maintained under lock and key control. Signs are posted on the gates warning persons to keep out of the areas beyond the gates. Locked gates are inspected daily by MDA security officers, and results of the inspection recorded on an inspection form. The inspection forms are filed in the MDA's offices and are available upon request.

MEC warning signs (Figure 2) are installed around the perimeter of the Alpha Area and Bravo Area, and are inspected by MDA security officers on a weekly basis. Missing or damaged signs are replaced. The MDA coordinates the community outreach program with the Army. A training video explaining the dangers of MEC is mandatory for anyone performing work on McClellan. The MDA and Matrix brief all contractors conducting work in these areas at McClellan on the possibility of encountering MEC, and describe emergency procedures to implement should MEC be encountered.

During 2010, construction was performed to rehabilitate a portion of Iron Mountain Road within MRS-2 and MRS-11. Construction crews were provided training in MEC avoidance, warning signage was provided along the new right-of-way (ROW) for the roadway, and gates were established along the ROW where feeder roads intersected the new road (named the Industrial Access Road). The Industrial Access Road was scheduled for opening in January 2011.

### ***2.19 Dog Kennel Area, Parcel 516(7)***

Interim LUCs have been established at the Dog Kennel Area to facilitate temporary use of the site by Auburn University for use in their canine training program. The interim LUCs for the Dog Kennel Area pertain to unexploded ordnance, and are intended to minimize the risk to human health and the environment, and to promote human safety. Therefore, use of the Dog Kennel Area property is restricted to surface use. The tenant's personnel, including employees

or authorized visitors, on site at the Dog Kennel Area must receive ordnance familiarization training. Additionally, “No Trespassing” signs are posted.

The MDA has incorporated provisions in the lease document prohibiting intrusive activity on the property. A training video explaining the dangers of MEC is mandatory for persons who enter and/or use the Dog Kennel Area. In 2009, MEC clearance activities were conducted in the Dog Kennel Area. An after Action Report is underway.

## ***2.20 Blacktop Training Area, Parcel 511(7) and Fenced Yard in Blacktop Training Area, Parcel 512(7)***

LUCs at the Training Area T-5 Sites include a restriction on public access and a restriction barring use of the property for any purpose pending completion of characterization and any required response action. Interim LUCs have been established at the Blacktop Training Area (part of the Training Area T-5 Sites) to facilitate temporary use of the site by Auburn University for use in their canine training program. Use of the Blacktop Training Area property is restricted to surface use.

## ***2.21 Golden Triangle and Y Area: M1.01, M3 Miscellaneous Property and Eastern Bypass “Y” Area Junction***

LUCs at the Golden Triangle and Y Area, located in the northern portion of the Bravo Area, include a deed notice in the property transfer documents that informs future property owners of the historical military use and provides notification procedures in the event a MEC item is discovered. A LUCIP modification documenting the requirement for construction support for MEC avoidance during construction of commercial buildings and infrastructure on the M1.01 Parcel and M3 Miscellaneous Property is pending approval of the current CA modification.

## ***2.22 Iron Mountain Road Ranges, Parcels 069Q, 070Q, 071Q, 075Q, 221-Q-X, 222Q-X***

LUCs at the Iron Mountain Road Ranges include a restriction on public access and a restriction barring use of the property for any purpose pending completion of characterization and any required response action. Currently the gate used to control access to Iron Mountain Road Ranges is controlled and locked by L&T. L&T is constructing a new four lane bypass road (Veterans Memorial Parkway) at the site. There is no public access until the road is finished. There is also a security fence on both sides of the new road that control access to the range.

On March 23, 2010, the MDA submitted to ADEM an inspection and maintenance plan to address the erosion control requirements for the slope of Range 12 in Parcel 70Q. Upon approval of the *Range 12 Supplemental Soil Removal and Erosion Control Report* (dated March 23, 2010), the MDA will perform quarterly inspections and routine maintenance to the Best Management Practices (BMPs) already installed at the slope of Range 12 to ensure BMP effectiveness until the slope is stabilized.



### **3.0 LUC VIOLATIONS AND ACTIONS**

LUC violations that occurred in 2010 are listed in Table 2. The security checks performed by the MDA security officer include checking for trespassers of any kind. The most common trespassers are poachers, walkers, and joggers. Both Federal and State Game Wardens occasionally patrol the areas frequented by poachers and have chased and apprehended poachers during sting operations. The Federal and State Game Wardens patrol throughout the site; including the Alpha and Bravo areas. The Wardens are trained in MEC awareness and patrol only on roadways and trails. The total elimination of poaching would be difficult due to the large area of the base, remoteness of many areas, the number of egress points through the woods onto the base, and the use of all-terrain vehicles by the poachers. The MDA security officers and Federal and State Game Wardens will continue to patrol known areas of poaching and trespassing.

Another LUC violation is warning sign theft. Warning signs are inspected by MDA security officers on a weekly basis. Missing or damaged signs are replaced.

#### **4.0 RECOMMENDATIONS**

It is recommended that regular inspections continue. Vigilance by MDA and Matrix employees in identifying areas where trespassing may be occurring should also continue, as well as support for the Federal and State Game Wardens.

## **TABLES**

**Table 1**  
**Land Use Control Summary**  
**Land Use Control Effectiveness Report**

Site - Parcel	Land Use Control
Landfill 1 - Parcel 78(6)	Restriction on digging or disturbance of soil (Deed 13, LUCIP) Monuments and signs (CA)
Landfill 2 - Parcel 79(6)	Restriction on residential use (Deed 13) Monuments and signs (Deed 13, CA) Restriction on digging or disturbance of soil (LUCIP)
Landfill 3 - Parcel 80(6)	Restriction on consumptive, other use or contact with groundwater (Deed 13, LUCIP) Restriction on digging or disturbance of soil (LUCIP) Restriction on residential use (Deed 13, LUCIP)
Landfill 4 - Parcel 81(5)	Restriction on consumptive, other use or contact with groundwater (Deed 13, LUCIP) Monuments and signs (Deed 13) Restriction on digging or disturbance of soil (LUCIP)
Industrial Landfill - Parcel 175(5)	Restriction on consumptive, other use or contact with groundwater (Deed 13, LUCIP) Monuments and signs (CA) Restriction on digging or disturbance of soil (LUCIP)
Former Post Garbage Dump - Parcel 126(7)	Restriction on digging or disturbance of soil (Deed 13, LUCIP) Access control, monuments and signs (CA)
Fill Area North of Landfill 2 - Parcel 230(7)	Restriction on digging or disturbance of soil (Deed 13, LUCIP) Access control, monuments and signs (CA) <sup>1</sup>
Fill Area East of Reilly - Parcel 227(7)	Restriction on digging or disturbance of soil (Deed 13, LUCIP) Access control, monuments and signs (CA)
Fill Area NW of Reilly - Parcel 229(7)	Restriction on digging or disturbance of soil (Deed 13, LUCIP) Monuments and signs (CA)
Training Area T-38 Former Technical Reaction Area - Parcel 186(6)	Restriction on public access (Deed 13) No use of property pending completion of characterization and a required response action (LUCIP)
Training Area T-6 (Naylor Field) - Parcel 183(6) and Cane Creek Training Area - Parcel 510(7)	Restriction on public access (Deed 13) No use of property pending completion of characterization and a required response action (LUCIP)
Small Weapons Repair Shop - Parcel 66(7)	Restriction on consumptive, other use or contact with groundwater (Deed 13, LUCIP)
Motor Pool Area 1500 and Chemical Laundry - Parcel 94(7)	Restriction on consumptive, other use or contact with groundwater (Deed 13, LUCIP)
Former Motor Pool Area 3100 – Parcels 24(7), 25(7), 73(7), 212(7), and 146(7)	Restriction on consumptive, other use or contact with groundwater (Motor Pool 3100 and Soldier's Chapel LUCIP)

**Table 1**  
**Land Use Control Summary**  
**Land Use Control Effectiveness Report**

Site - Parcel	Land Use Control
Former Washrack, Building 1740, Soldier's Chapel – Parcel 127(7)	Restriction on consumptive, other use or contact with groundwater (Motor Pool 3100 and Soldier's Chapel LUCIP)
General Services Administration (GSA) Warehouse Area – Parcels 151(4), 2(4), 3(4), 4(4), 67(4), 69(4), 91(4), 111(4), 128(4), 129(4), and 238(4)	Restricted to commercial and industrial reuse (GSA Warehouse LUCIP) Restriction on consumptive, other use or contact with groundwater (GSA Warehouse LUCIP)
Alpha Area (Multiple Parcels) and MRS-1 (Bravo Area)	Public education and restriction on public access (Deed 13) No use of property pending completion of characterization and a required response action (LUCIP)
Dog Kennel Area	Restricted to surface use only Ordnance familiarization training No trespassing signs
Blacktop Training Area, Parcel 511(7) and Fenced Yard in Blacktop Training Area, Parcel 512(7) (part of Training Area T-5 Sites)	Restriction on public access (Deed 13) Restricted to surface use only No use of property pending completion of characterization and a required response action (LUCIP)
Golden Triangle and Y Area: M1.01, M3 Miscellaneous Property and Eastern Bypass “Y” Area Junction	Deed notice in the property transfer documents with procedures to follow if MEC items are discovered. A LUCIP modification re: construction support for MEC avoidance during construction activities pending approval of CA modification.
Iron Mountain Road Ranges, Parcels 069Q, 070Q, 071Q, 075Q, 221Q-X, and 222Q-X	Restriction on public access (CA) No use of property pending completion of characterization and a required response action (CA)

CA - Cleanup Agreement

LUCIP - Land Use Control Implementation Plan

<sup>1</sup> Monument and sign installation pending MEC Clearance.

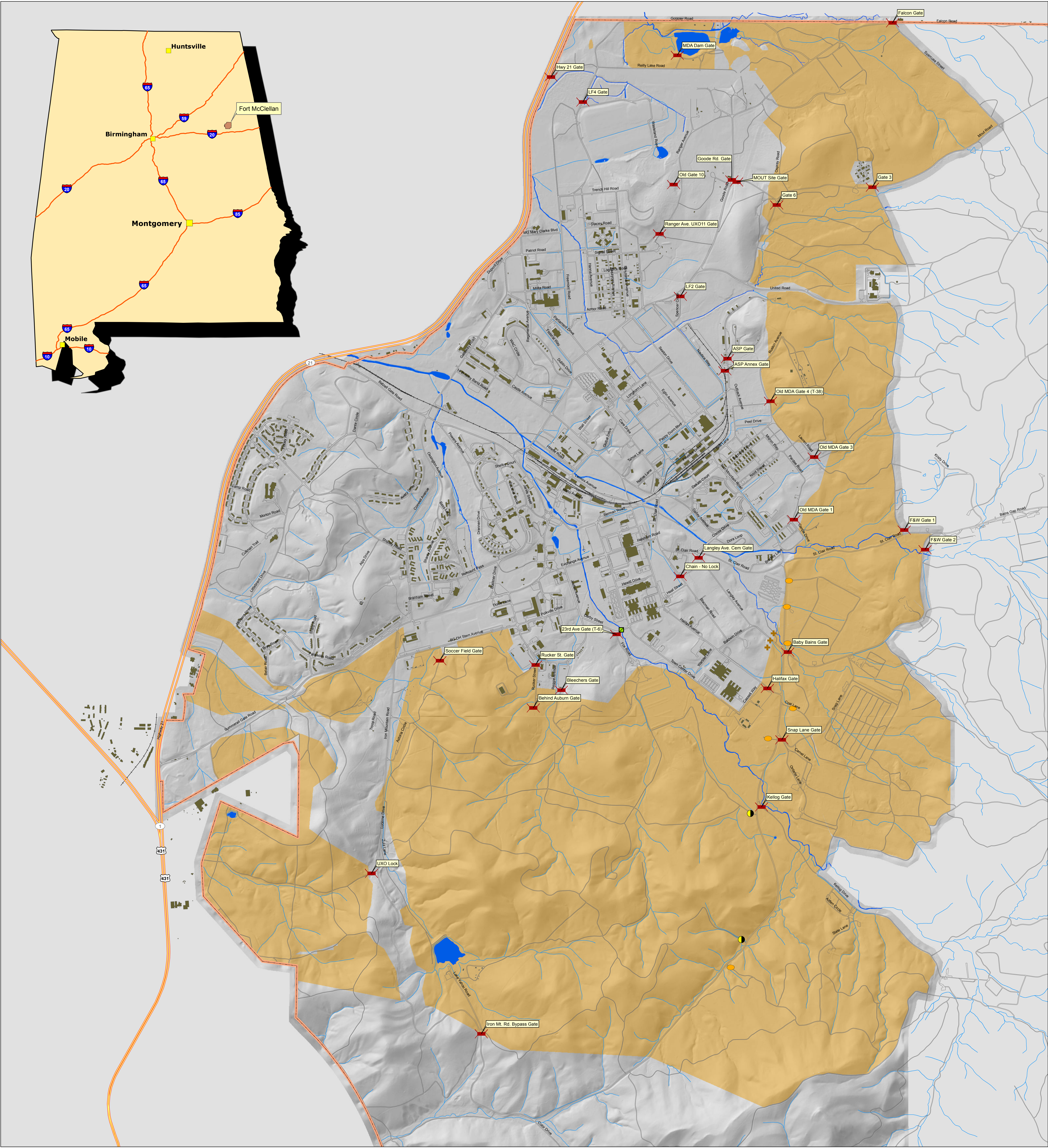
**Table 2. Incident Summary Table**

No.	Date of Incident	Time of Incident	Summary of Incident
1.	January 8, 2010	2:18 PM	MDA/UXO Gate #5 was found unlocked and open with no guard present. Security preformed a check and found the MDA to be unloading a trailer at the Industrial Landfill. The gate was secured once MDA left the area.
2.	January 9, 2010	9:20 AM	Security found the Goode Road Main gate chain completely removed from the gate. Security fastened the chain to the gate as a temporary fix until it could be repaired.
3.	January 12, 2010	8:54 AM	Highway 21 gate was found open and the contractor lock unlocked. A full search of the area was performed and no personnel was found in the area. The Highway 21 gate was secured.
4.	February 13, 2010	2:08 PM	Security witnessed two males in a dark colored F-150 pickup truck driving on the soccer field. Anniston police were called and proceeded to arrest the driver of the vehicle.
5.	April 29, 2010	8:44 AM	UXO Gate 18 at Baby Bains Road in MRS-2 is broken. NAEVA Penny had reported the gate to Matrix office and Matrix had contacted the contractor for repairs. Gate was temporarily secured until permanent repair could take place.
6.	April 30, 2010	6:24 PM	Security discovered the MRS-2 gate open after working hours. A patrol of the area found the Eastern Bypass gate unlocked as well but no personnel in the area. The two gates were relocked and Matrix was notified.
7.	June 5, 2010	1:48 PM	Security found the chain on MDA/UXO Gate #5 cut with bolt cutters. Security relocked the gate and searched the area for unauthorized personel. Matrix was notified and the chain was replaced and the gate secured.
8.	June 23, 2010	8:18 AM	Security found someone jogging down the road in the Charlie Area. Security escorted the jogger out of the area. Jogger said he was National Guard and had ran too far down the hiking trail.
9.	June 26, 2010	9:07 AM	Security found the Mout Site Gate #3 unlocked. The lock was attached to the chain but not completely locked. A search of the Mout site was performed and the lock was relocked upon exit.
10.	June 28, 2010	8:01 AM	Security found the ASP gate open with no guard. Matrix personel was found to be inside the gate. Security acted as gate guard until personel exited the ASP and the gate was relocked.
11.	July 2, 2010	7:21 AM	Security discovered the EODT building on 2nd Ave open and unlocked with no EODT personnel present. Security notified Matrix and EODT and closed and locked the building.
12.	July 2, 2010	4:26 PM	Security personnel noticed the barricades on 5th Avenue had been moved. The incident was reported to Matrix and the barricades replaced and area secured the morning of the 3rd.
13.	July 7, 2010	8:04 AM	Security discovered Old MDA gate #6 dummy locked. UXO crews were working in the vicinity so no patrol of trespassers was performed. The gate was relocked.
14.	October 10, 2010	11:22 AM	The old MDA gate # 2 chain was cut from the trees and removed. No unauthorized personnel was found.
15.	December 13, 2010	2:52 PM	UXO Gate 18 was found open with no gate guard.. A complete check of the area was performed and no unauthorized personnel was found. The gate was relocked upon exit.



## FIGURES





- Legend**
- Fencing
  - Gate
  - Chain
  - Dirt Berm
  - Jersey Barrier
  - Fort McClellan Boundary
  - Buildings
  - Water Body
  - Streams
  - Railroads
  - Highways
  - Roads

**LAND USE CONTROLS**

McCLELLAN  
ANNISTON, ALABAMA





**DANGER**

**IMPACT AREA  
KEEP OUT**

