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March 2, 2018

Mr. William Duke and Mrs. Brandi Little
Alabama Department of Environmental
Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

Subject: Cleanup Agreement No. A14 210 020 562
Transmittal of *After Action Report for Munitions Response Site 8 (MRS-8),
McClellan, Anniston, Alabama*

Dear Mr. Duke and Mrs. Little:

This letter is sent to forward responses to comments and final copies of *After Action Report for Munitions Response Site 8 (MRS-8), Bravo Munitions Response Area, McClellan, Anniston, Alabama (March 2018)* on behalf of the McClellan Development Authority. This includes an environmental covenant pursuant to the Alabama Uniform Environmental Covenants Act, Code of Alabama 1975, §§ 35-19-1 to 35-19-14 which has been filed in Probate and included in the report as Appendix K. Please contact me at 404.414.7054 if you have any questions on this submittal.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC.

A handwritten signature in black ink, appearing to read "Richard L. Satkin".

Richard L. Satkin, P.G.
Vice President

c: Robin Scott - MDA
Lisa Holstein – Army TF
Tom Bourque - UXOPro

Responses to ADEM Review Comments dated 20 February 2018 to
*Munitions and Explosives of Concern (MEC) Remediation After Action
Report (AAR) Munitions Response Site 8 (MRS-8) McClellan, Anniston
Alabama* dated 18 September 2017

Comment 1. Page iii, Executive Summary, Second Paragraph: This section states, "The contractors recovered 447 of 458 (97.6%) QC and Quality Assurance (QA) blind seeds testing the clearance operations." The text reads as though eleven seeds were never recovered. If all seeds were indeed recovered during rework, please include a sentence within the document where this fact is explicitly stated.

Response 1. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.

Comment 2. Page 3, Section 1.1 Project Description and Objective, Fourth Paragraph: This section states, "A total of 688 MPPEH items, which included 434 MEC items, were recovered and explosively destroyed in demolition operations." However, the executive summary stated that 1,122 Material Potentially Presenting an Explosive Hazard (MPPEH) items were recovered. Please address.

Response 2...1,122 MPPEH items of which 434 were MEC (and 688 which were determined to be MDAS after demolition). Text was corrected accordingly.

Comment 3. Page 13, Section 2.7 Aggressive Surface/Near-Surface Clearance, Second Paragraph: This section states, "Teams would delineate five-foot lanes using ropes and search the area using hand-held magnetometers." Previously within the report, it was stated that the typical main instrument utilized was the White due to lack of Valons. The White is not considered a magnetometer. Please revise the terminology throughout the report to include both types of instrumentation, if appropriate.

Response 3. Text was revised to indicate magnetometers and all metals detectors as appropriate.

Comment 4. Page 20, Section 2.13 Demolition Operations: This section states, "A total of 1,122 MPPEH items were found. Of these, 434 were determined to be MEC by explosive investigation or x-ray operations as summarized below in Table 2-2 below: ..." The Department notes that the database labeled "X-ray" is blank. Please clarify whether or not this specific activity was performed and, if so, please include all relevant data within the database.

Response 4. X-ray operations were authorized (by FCR 8) starting in November 2009. However, as 2.36-in rockets were the primary driver for x-ray inspection, and no 2.36-in rocket MPPEH were found in MRS-8, no X-rays were performed in this MRS. The reference to the x-ray operation has been stricken from the text.

Comment 5. Page 26, Section 4.1.3 Intrusive Investigation, Fourth Bullet: This section states, "367 blind QC seeds were placed in MRS-8 (1.34 per acre) to test UXO operations. 363 (98.9%) of the seeds were recovered during UXO operations just

missing the 100% recovery goal." The text reads as though four seeds were never recovered. If all seeds were indeed recovered during rework, please include a sentence within the document where this fact is explicitly stated.

Response 5. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.

Comment 6. Page 41, Section 5.2.1 UXO QA Blind Seeding Program: This section states, "A total of 91 QA seed items were placed in MRS-8 by the UXOQA to test final product MEC clearance results (Table 5-4). USAE missed 4 QA seeds in tract 8-E. As part of the corrective action SGO (Sterling Global Operations) was brought on to complete work in 8-E. 84 QA seeds were recovered resulting in a 92.1% recovery rate." The text reads as though seven seeds were never recovered. If all seeds were indeed recovered during rework, please include a sentence within the document where this fact is explicitly stated.

Response 6. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.

Comment 7. Page 42, Section 5.3 QA Conclusions, Third Bullet: This section states, "84 of 91 (92%) QA blind seeds were recovered." Please see Comment 6 above.

Response 7. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.

Comment 8. Page 43, Section 6.0 Conclusions, Second Paragraph: This section states, "The dig teams recovered 363 of 367 QC blind seeds and 84 of 91 QA blind seeds." Please see Comments 5 and 6 above.

Response 8. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.

Comment 9. Appendix H, Waste Disposal Records: According to the Department of Defense Form 1348-1 A within Appendix H, ADEM notes that Material Documented as Safe (MDAS) from other MRSs were combined with MRS-8 MDAS. Please provide an explanation regarding this decision.

Response 9. Multiple MRSs in various stages of completion were being worked concurrently over the duration of the performance of MRS-8 (2009, 2010 and the range butt exception area in 2017). As a result, inspected, processed, and certified MDAS from more than one MRS was comingled in locked 20-yard roll-off containers which were sent offsite for final recycling when full. This is consistent with all previous MRS remediations at McClellan which have been accepted by ADEM.