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April 19, 2021

ELECTRONICALLY TRANSMITTED

Mr. Jason C. Odom ESCA Case Manager McClellan Development Authority 4975 Bains Gap Road Anniston, AL 36205

RE: ADEM Review and Concurrence: Corrective Measures Effectiveness Report, Tenth Year Long-Term Monitoring, Former Small Weapons Repair Shop, Parcel 66(7), dated January 14, 2021
Fort McClellan, Calhoun County, Alabama
Facility I.D. No. AL4 210 020 562

Dear Mr. Odom:

The Alabama Department of Environmental Management (ADEM or the Department) has completed its review of the McClellan Development Authority's (MDA) Corrective Measures Effectiveness Report (CMER), Tenth Year Long-Term Monitoring, Former Small Weapons Repair Shop, Parcel 66(7), received on January 20, 2021. Based on this review, the Department considers the subject document to be complete and concurs with MDA's recommendation to continue with routine groundwater monitoring in accordance with the Final Corrective Measures Implementation Plan Addendum and the Second Amendment to the Corrective Measures Implementation Plan.

However, please note that the groundwater sampling documentation in "Appendix A" of the document shows that some monitoring wells may have been sampled before they were adequately purged. In accordance with the *Alabama Environmental Investigation and Remediation Guidance (AEIRG)*, "An adequate purge is achieved when a minimum of 3 to 5 total well volumes of standing water have been removed and when the pH, specific conductance, and temperature of groundwater have stabilized and the turbidity has either stabilized or is below 10 Nephelometric Turbidity Units (NTUs)." The turbidity of the wells during sampling at the Former Small Weapons Repair Shop in 2020 ranged from 2.67 NTUs to 102.6 NTUs, which potentially indicates a true representative sample of the raw water in the well may not have been attained in some of the samples collected last year. The Department recommends that MDA adequately purges all wells in accordance with the ADEM's *AEIRG* during future groundwater monitoring events.



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For any questions or concerns regarding this matter, please contact Mrs. Heather Guerrero of the Remediation Engineering Section at 334-271-7738 or via email at heather.guerrero@adem.alabama.gov.

Sincerely,

Jason Wilson, Chief

Governmental Hazardous Waste Branch

Land Division

JJW/ATM/HLG/md

Cc via email: Mr. Richard Satkin/ Matrix

Mr. Gerald Hardy/Matrix Ms. Lisa Holstein/ FTMC Mrs. Brandi Little/ ADEM

Mr. Norman Lee Thomas/ ADEM Mrs. Ashley T. Mastin/ ADEM