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May 30, 2017

Mr. Stephen A. Cobb, Chief
c/o Mrs. Brandi Little
Governmental Hazardous Waste Branch Land Division
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, Alabama 36130-1463

SUBJECT: Response to ADEM Comments dated May 18, 2017 associated with the *Corrective Measures Effectiveness Report, June 2015 to March 2016 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)*; dated May 5, 2016

Dear Mr. Cobb:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (MES) is pleased to submit the Response to ADEM Comments dated May 18, 2017 associated with the *Corrective Measures Effectiveness Report, June 2015 to March 2016 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)*; dated May 5, 2016. Also included are two copies of the replacement pages referenced in the comment response.

Two hard copies of these pages have been provided to Mrs. Brandi Little. Please contact me at (256) 847-0780 should you have any questions or comments.

Sincerely,
MATRIX ENVIRONMENTAL SERVICES, LLC

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

Richard Satkin, P.G
McClellan Program Manager

Enclosure

CC: Mrs. Brandi Little, ADEM (two paper copies)
Mr. Robin Scott, MDA (transmittal letter only)
Ms. Lisa Holstein, U.S. Army (one paper copy)
MES Files (one paper copy)

Response to ADEM Review and Comments dated May 18, 2017

RE: *Corrective Measures Effectiveness Report, June 2015 to March 2016 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7); dated May 5, 2016*

Specific Comment 1

Page 1-1, Section 1.1: The bulleted list states that Appendix B contains the Analytical Data table and Lab Data Sheets; however, the Lab Data Sheets are in Appendix D. Please address.

MDA Response:

Page 1-1, Section 1.1 has been revised to state that “Appendix B contains the Analytical Data Table.” The List of Appendices on Page iii was also revised to state “Appendix B Analytical Data Table.”

Specific Comment 2

Page 2-1, Section 2.2, Paragraph 2: The text states that land use controls at the site include "a prohibition on consumptive use or direct contact with groundwater and installation of any well for extraction of groundwater for purposes of consumptive or other uses." Please revise the text to include that covenant FY-12-06.00 also prohibits public access and use of the property for any purpose until the remedy is completed.

MDA Response:

The text has been revised to state “Land use controls (LUCs) at the Site include a prohibition on consumptive use or direct contact with groundwater, installation of any well for extraction of groundwater for purposes of consumptive or other uses, and also prohibits public access and use of the property for any purpose until the remedy is completed.”

Specific Comment 3

Page 3-1, Section 3.1, Paragraph 2: The text states that the "monitoring well sample collection logs are provided in Appendix B". Please revise the text to state that these collection logs are in Appendix A.

MDA Response:

The text has been revised to state that these collection logs are located in “Appendix A.”

Specific Comment 4

Page 5-1, Section 5.3: The text states that the addition of the emulsified vegetable oil in combination with a bioaugmentation culture has been effective in decreasing corrective action constituents of concern (COCs). "Four quarterly monitoring events have been conducted for the first year following the ISB [in-situ bioremediation] implementation. Two semi-annual events will be conducted during this next year and the frequency of monitoring will then be reassessed." Please note that in Table V.1. of the Cleanup Agreement, the sampling frequency given for Training Area T-6 wells is "quarterly until reduction of COCs, then semi-annually." ADEM notes that the referenced sampling frequency was based off the previous remedy of soil vapor extraction/air sparging as discussed in the Final Corrective Measures Implementation Plan (CMIP). ADEM concurred with the Addendum to the Final CMIP to change the selected remedy to ISB, but no changes were requested for the sampling frequency. Before revisions can be made to the sampling frequency for T-6 or any other site at Fort McClellan, MDA should submit a request to modify the Cleanup Agreement. Please address.

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RE: *Corrective Measures Effectiveness Report, June 2015 to March 2016 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7);* dated May 5, 2016

MDA Response:

Matrix and Geosyntec Consultants, on behalf of the MDA, met with the Department on November 14, 2013 to provide a summary of the transition from Air Sparge/Soil Vapor Extraction (AS/SVE) to the in-situ bioremediation (ISB). The transition was completed in January 2015 with the injection of the emulsified vegetable oil in combination with the bioaugmentation culture. The sampling schedule of four quarterly events the first year, followed by two semi-annual sampling events the second year was presented to the Department in the transition meeting on November 14, 2013, in the summary of minutes provided on December 17, 2013, in the 2014 UIC permit application, and in the 2015 Corrective Measures Effectiveness Report. Although a separate letter to the Department requesting a change in the monitoring schedule in the Cleanup Agreement was not provided, MDA believes that the correspondences listed above were sufficient to meet that intent.

Specific Comment 5

Table 4-5: In the values presented for monitoring well (MW) MW07, the information given for the amount of methylene chloride for sampling dates 4/4/13 and 12/7/15 appears to be incomplete due to formatting. Please address. Please note that similar formatting issues appear for MWI6, MW22 and MW23.

MDA Response:

The formatting has been fixed in the revised table.

Specific Comment 6

Figures 4-9 through 4-22: It appears that sampling data collected on March 4, 2016 is not included in these figures. Please address.

MDA Response:

The March 4, 2016 sampling data was inadvertently omitted in Figures 4-9 through 4-22. The figures have been revised to include the March sampling data.