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June 13, 2018

Mr. Jason Wilson 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 30, 2018 associated with the *Corrective Measures Effectiveness Report, September 2016 to March 2017 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)*; dated June 1, 2017

Dear Mr. Wilson:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (MES) is pleased to submit the Response to ADEM Comments dated May 30, 2018 associated with the *Corrective Measures Effectiveness Report, September 2016 to March 2017 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)*; dated June 1, 2017. Also included are two copies of the revised document and a redline strike out version to assist in your review.

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 that reads "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 30, 2018

RE: *Corrective Measures Effectiveness Report, September 2016 to March 2017 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7);*  
dated June 1, 2017

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### **Specific Comment 1**

*Page ES-1, Paragraph 6: The text states that "four of the five corrective action COCs (1,1,2,2-tetrachloroethane [1,1,2,2-PCA], tetrachloroethene [PCE], trichloroethene [TCE], and one degradation product (vinyl chloride) exceeded the groundskeeper RBTLs ...." During the semi-annual sampling events, only three of the five corrective action COCs (constituents of concern) exceeded groundskeeper RBTLs (risk-based target levels). The three COCs in exceedance were 1,1,2,2-PCA, PCE and TCE. The text also identifies tetrachloroethene as both PCE and PCA. Please address.*

#### **MDA Response:**

The text has been revised to state that "Three of the five Corrective Action COCs (1,1,2,2-tetrachloroethane [1,1,2,2-PCA], tetrachloroethene [PCE], trichloroethene [TCE]) and one degradation product (vinyl chloride) exceeded the groundskeeper RBTLs in groundwater collected at the Site during the semi-annual sampling events during this reporting period."

### **Specific Comment 2**

*Page 4-1, Section 4.1.4, Paragraph 1: The text states that four of the five corrective action COCs exceeded groundskeeper RBTLs during the reporting period. Please revise the text to state that three of the five corrective action COCs exceeded groundskeeper RBTLs.*

#### **MDA Response:**

The text has been revised to state "Three of the five Corrective Action COCs and one Corrective Action COC degradation product (vinyl chloride) exceeded the groundskeeper RBTLs in the groundwater collected during this reporting period."

### **Specific Comment 3**

*Page 4-1, Section 4.1.4, Paragraph 2: The text states that eleven of the LTM (long-term monitoring) wells were above the groundskeeper RBTLs. Please revise the text to state that there were twelve LTM wells in exceedance and include CWM-183-MW08 in the list.*

#### **MDA Response:**

The text has been revised to state "...twelve of the LTM wells (CWM-183-MW04, CWM-183-MW07, CWM-183-MW08, CWM-183-MW09, CWM-183-MW11, CWM-183-MW13, CWM-183-MW16, CWM-183-MW17, CWM-183-MW20, CWM-183-MW21, CWM-183-MW22, and CWM-183-MW23) were above the groundskeeper RBTLs."

### **Specific Comment 4**

Page 4-2, Section 4.3: The text states that the concentrations of 1,1,2,2-PCA, 1,1,2-TCA, PCE and TCE exceeding the groundskeeper RBTLs in groundwater occurred in three wells. Please remove 1,1,2-TCA from the list as there were no exceedances in any wells during the reporting period.

#### **MDA Response:**

The text has been revised to remove 1,1,2-TCA from the list.

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### **Specific Comment 5**

*Page 5-1, Section 5.2: The text states in Line 1 that four of the five corrective action COCs exceeded groundskeeper RBTLs. The text in Lines 5 and 6 correctly states that 1,1,2-TCA and chloroform were not detected above groundskeeper RBTLs; however, the text in Line 7 identifies 1,1,2-TCA as exceeding RBTLs in three wells. Please address.*

#### **MDA Response:**

The text in Line 1 has been revised to state that “three of the Corrective Action COCs (1,1,2,2-PCA, PCE, and TCE) and one degradation product (vinyl chloride) exceeded the groundskeeper RBTLs in groundwater collected at the Site during this reporting period, as shown in Table 4-5. The text in Line 7 has been revised to state that “The concentrations of 1,1,2,2-PCA, PCE, and TCE exceeding the groundskeeper RBTLs in groundwater occurred in wells CWM-183-MW07, CWM-183-MW09, and CWM-183-MW23 as indicated in Figures 4-19 to 4-22.”

### **Specific Comment 6**

*Table 4-5: The sampling results presented for CWM-183-MW09 for 9/28/16 are highlighted as exceeding the groundskeeper RBTLs even though the well was listed as dry. Please address.*

#### **MDA Response:**

The table incorrectly presented CWM-183-MW09 as exceeding the groundskeeper RBTLs. The well was dry at the time of the sampling event and Table 4-5 has been revised

### **Specific Comment 7**

*Table 4-5: The sampling result presented for CWM-183-MW23 for 1,1,2,2-PCA for 9/28/16 should be highlighted as it exceeds the groundskeeper RBTL. Please address.*

#### **MDA Response:**

Table 4-5 sample result for CWM-183-MW23 for 1,1,2,2-PCA for 9/28/16 has been highlighted.

### **Specific Comment 8**

*Figures 4-5 through 4-18: All of these figures list three sampling dates, August 2016, November 2016 and March 2017, as the sample dates for this semi-annual reporting period. Please address.*

#### **MDA Response:**

The semi-annual sampling was conducted in September 2016 and March 2017. The August 2016 and November 2016 dates on the grid line are used to show the progression of time and not the actual date of sampling. The data point for the September 2016 sampling event is actually shown in between August and November 2016.

### **Specific Comment 9**

*Figures 4-5 through 4-18: These figures illustrate groundwater volatile organic compound (VOC) concentrations in different monitoring wells at the site. Please clarify why CWM-183-MW15 and CWM-183-MW17 are not included in these figures as each well has had exceedances of vinyl chloride.*

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### **MDA Response:**

Two figures have been added to include CWM-183-MW15 and CWM-183-MW17 exceedances of vinyl chloride.

### **Specific Comment 10**

*Figure 4-21: This figure illustrates the estimated lateral extent of corrective action COC concentrations in the residuum LTM wells exceeding RBTLs. According to Table 4-5, CWM-183-MW07 exceeded the RBTL for PCE. Please revise this figure to extend the lateral extent of PCE contamination to CWM-183-MW07.*

### **MDA Response:**

The Figure has been revised to extend the lateral extent of PCE contamination to CWM-183-MW07. Due to the insertion of two additional figures representing exceedances of vinyl chloride in CWM-183-15 and CWM-183-MW17, Figure 4-21 has been renamed to Figure 4-23.