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July 27, 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 July 17, 2018 associated with the *Corrective Measures Effectiveness Report, September 2017 to March 2018 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)*; dated May 29, 2018

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 July 17, 2018 associated with the *Corrective Measures Effectiveness Report, September 2017 to March 2018 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)*; dated May 29, 2018. Also included are two copies of the revised document and a redline strike out version to assist in your review.

Two hard copies 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 July 17, 2018

RE: *Corrective Measures Effectiveness Report, September 2016 to March 2018 Monitoring Events Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7); dated May 29, 2018*

Specific Comment 1

Page ES-1, Executive Summary, Paragraph 6. The text states that an additional round of sampling was collected during December 2017 to satisfy the requirements of the underground injection control permit. Please add in the text that the results of this sampling round are found in Appendix B.

MDA Response:

The text has been revised to state “The results of the UIC sampling are found in Appendix B.”

Specific Comment 2

Page 1-1, Section 1.1. The bulleted list describes the different sections in the CMER. Appendix B contains the Analytical Data Table and Appendix E contains the Analytical Data for Performance Monitoring Wells. Please clarify which wells are the performance monitoring groundwater wells as the information presented in both Appendices is almost identical.

MDA Response:

The bulleted list has been revised to “Appendix E Additional Analytical Data”. Additionally, page iii, List of Appendices has been revised to read “Appendix E Additional Analytical Data” and references to performance monitoring wells have been removed.

Specific Comment 3

Page 3-1, Section 3.0, 4th bullet. This bullet discusses which monitoring wells were sampled for corrective action constituents of concern (COC) and degradation products only. It appears that CWM-183-MW15 is missing from the list and CWM-183-MW25 was listed twice. Please address.

MDA Response:

The text has been revised and the duplicate listing of CWM-183-MW25 has been removed. The 4th bullet did not include CWM-183-MW15 as it was analyzed for not only the Corrective Action COCs and degradation products, Ethane, Ethene, Methane, total organic carbon, but also anions Ammonia, Nitrate and Sulfate

Additionally, the text on page 5-1, Section 5.1, 4th bullet was also revised to remove the duplicate listing of CWM-183-MW25.

Specific Comment 4

Page 3-1, Section 3.1, Paragraph 1. The text states that Figure 3-1 shows the locations of the long-term monitoring (LTM) and performance monitoring groundwater wells. The title of Figure 3-1 is Long-Term Groundwater Monitoring Well Locations and it appears to only show the LTM wells. Please clarify which wells are the performance monitoring groundwater wells and if they are highlighted in the figure.

MDA Response:

The text has been revised to read “Figure 3-1 shows the locations of the LTM groundwater wells”.

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Specific Comment 5

Page 5-1, Section 5.2. The text states that Figures 4-19 to 4-22 illustrate the exceedances of the COCs in the wells that are listed, including CWM-183-MW07. The lateral extent of 1,1,2,2-tetrachloroethene contamination does not extend to this well on Figure 4-19. Please address.

MDA Response:

The MDA believes that the constituents in question should be 1,1,2,2- tetrachloroethane. Figure 4-19 has been revised.