



McCLELLAN DEVELOPMENT AUTHORITY

April 10, 2018

Mr. Owen Nuttall
BRAC Environmental Coordinator
1508 Hood Avenue, Room A-103
Forest Park, GA 30297

We are in receipt of your letter dated March 20, 2018 regarding your position with respect to the *Corrective Measures Implementation Report, Soil Remediation, Former Fort McClellan – Baby Bains Gap Road Ranges, Range 23 & 25 East*, Anniston, AL, dated November 2016, Rev.1 (CMIR). The Alabama Department of Environmental Management (ADEM) approved the CMIR, through the issuance of a concurrence letter, on December 8, 2017.

The work documented in the CMIR was completed in accordance with the ADEM – approved *Corrective Measures Implementation Plan – Soil Remediation McClellan Baby Bains Gap Road Ranges, Range 23 & 25 East*, Anniston, AL, Rev. 1 (CMIP). The CMIP was developed in accordance with the Cleanup Agreement, No. AL4 210 020 562, Mod. 4 (CA) between the MDA and ADEM, the then current *Alabama Environmental Investigation and Remediation Guidance document, Rev.3*, September 2005, the *Superfund Lead- Contaminated Residential Sites Handbook* (EPA, 2003), *Alabama Risk Based Corrective Action Manual, Rev. 3.0*, February 2017 (ARBCA), and the ADEM Corrective Measures Implementation (CMI) remediation checklist.

It is important to note that during the Remedial Investigation (RI) completed by the Army, sampling data from ten target mounds was extrapolated to be representative of all 96 target mounds in Range 23. Following completion of the RI and prior to performing the metals remediation two events, that had a notable impact on the projected areas of contamination associated with the target mounds, occurred. First, MEC remediation efforts in Range 23 included the digging and removal of the concrete structures associated with the pop up targets at each mound. The second event, which was a precursor to the metals remediation, was the cutting and removal of all trees/vegetation in the range. Both of these events disturbed the contaminant distribution in the surface soil. Additionally, active contaminant fate and transport mechanisms can result in the redistribution of site contaminants. Therefore, prior to performing soil remediation the decision was made to characterize the entire range.

The delineation sampling performed by MDA and its contractors as part of the remediation was complete, thorough, and systematic for determining areas requiring removal. The composite sampling approach that was employed for delineating contamination is a widely accepted technique throughout the industry. The entire target mound area encompassing all 96 mounds was gridded and sampled using a cell size appropriate to account for the features and protective of human health and the environment. The geometry of the grid system was established to more closely represent the site conditions of Range 23, which resulted in 50 grids encompassing all 96 mounds. Furthermore, the cell size used (65 x 154-foot) is smaller than the recommended size for achieving unrestricted use in a residential setting (1/3 acre – 1 acre), even though the projected reuse of the area is industrial.

During the execution of the delineation phase of the remediation process, the MDA collected more than fifty (50) samples in the area of Range 23, including more than ten (10) additional duplicate samples in this area. As part of the Quality Assurance/Quality Control procedures established for this remediation, the MDA also performed four (4) spatial variability duplicate samples to ensure that the selected sample locations were representative of site conditions. These samples were analyzed with an X-Ray Fluorescence instrument (XRF), with select samples being sent for offsite laboratory analysis to ensure the XRF accuracy. It should be noted that this remediation process is similar to the remediation work performed by the Army at the Alabama Department of Transportation portions of the Iron Mountain Road Ranges, as presented in the *Final, Removal Action Report, Iron Mountain Road Ranges Soil Remediation on ALDOT Eastern Bypass Corridor Property*, March 2006.

The environmental remediation of Ranges 23 & 25 East was performed in strict accordance with the approved CMIP under ADEM oversight. No deviations from the approved technical approach were implemented during the remediation activities.

Environmental Services Cooperative Agreement No. W9128F-07-2-0163 (ESCA) between the Army and the MDA states that the Recipient (MDA) is obligated to comply with the Cleanup Agreement under oversight by ADEM, and that the Army and MDA agree that the performance of the Environmental Services by the MDA will satisfy those obligations of the Army under CERCLA and NCP.

Bottom line, the MDA believes that the lead contamination delineation sampling on Range 23 was thorough and complete and all requirements with respect to the Environmental Services (remediation) for Ranges 23 and 25 East were satisfied. The MDA is currently in the process of completing the Final Report of Corrective Measures (FRCM) for this Site.

One final note; the Army Transition Force and JPA/MDA have enjoyed a close and productive collaboration dealing with environmental cleanup issues on McClellan for well over a decade. Our offices are less than a one mile drive from each other. As we have done in the past, The MDA /Matrix team stands ready to meet informally at any time and answer any questions or provide additional clarifications that may arise during Army review of related program decision documents. More often than not, such issues can be quickly resolved in this manner and obviate the need for formal notifications and, if required, follow-on negotiations in accordance with the ESCA agreement.

Respectfully,



Robin Scott
Executive Director
McClellan Development Authority

Cc: Mr. Tom Lederle/U.S. Army BRAC
Mr. Jason Wilson/ADEM
Mr. Richard Satkin/Matrix