

April 13, 2011

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: Final Groundwater Sampling Report, June 2006 and
Request for NFA with Land Use Controls
Former Motor Pool Area 3100, Parcels 24(7), 25(7), 73(7), 212(7), and 146(7)
McClellan, Anniston, Alabama**

Dear Mr. Cobb:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (MES) is submitting the *Final Groundwater Sampling Report, June 2006, Former Motor Pool Area 3100, Parcels 24(7), 25(7), 73(7), 212(7), and 146(7) (Groundwater Sampling Report)* for your approval. This report incorporates the MDA's responses, dated October 10, 2008 and September 28, 2010, to Alabama Department of Environmental Management (ADEM) comments. ADEM provided concurrence on the responses and subsequently the report on December 20, 2010. The concurrence includes approval for No Further Action (NFA) with Land Use Controls (LUCs).

The MDA notes that the use of LUCs was previously approved by ADEM in a concurrence letter issued on July 8, 2008 for the *Draft Land Use Control Implementation Plan: Motor Pool Area 3100, Parcels 24(7), 25(7), 73(7), 212(7), and 146(7), and Former Washrack, Building 1740, Soldier's Chapel, Parcel 127(7)*, dated April 16, 2007, to restrict consumptive use and direct contact to groundwater and to prohibit the drilling of wells for water at this site.

This document was completed in accordance with the requirements of the Cleanup Agreement (CA) between the MDA and the ADEM and is being provided to ADEM in partial fulfillment of the requirements set forth in the Environmental Services Cooperative Agreement (ESCA) between the MDA and the Army. With the submittal of this *Final Groundwater Sampling Report*, the MDA is requesting several changes to the Cleanup Agreement once the ADEM grants final approval of the subject document.

- Motor Pool 3100, Parcels 24(7), 25(7), 73(7), 212(7), and 146(7), referred to as the Site, currently resides in **Table III.1 (List of Parcels, Sites, SWMUs and/or AOCs Requiring an RFI)** of the CA. Because ADEM has concurred on the use of LUCs and NFA for this site, the MDA requests moving this Site to **Table III.2, List of SWMUs and AOCs Requiring No Further Action at this Time**.

- Also, if acceptable to ADEM, the MDA requests a new section describing the Final LUCs for the Site be added as IV.2.K. Draft text has been provided to ADEM for incorporation in an upcoming CA modification.
- If the above changes are acceptable to ADEM, the MDA also requests updates to Tables I.1, I.2 and VI.1 to reflect the revised location of the Site in the NFA table as well as the table summarizing LUCs.

Due to the recently promulgated regulations establishing minimum requirements governing environmental covenants pursuant to the Alabama Uniform Environmental Covenants Act (UECA), Code of Alabama 1975, §§ 35-19-1 to 35-19-14. ADEM Admin. Code r. 335-5 (effective May 26, 2009), the MDA plans to submit the required covenant request for the Site within 90-days of the effective date of the CA modification. This upcoming submittal will include a copy of the survey plat, covenant language, and appropriate fees. In addition, Quitclaim Deed 13 will be amended at a later date to impose ADEM approved LUCs.

Two hard copies and one electronic copy of the document have been provided to Mrs. Brandi Little. It has been a pleasure working with you on this program. Please contact me at (256) 847-0780 (Anniston) or (770) 594-0331 (Atlanta) should you have any questions or comments.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC



Richard Satkin, P.G.

McClellan Program Manager

CC: Mrs. Brandi Little, ADEM (two paper copies and one electronic copy on CD-ROM)
Mr. Robin Scott, MDA (transmittal letter only)
Ms. Lisa Holstein, U.S. Army (one paper copy and one electronic copy on CD-ROM)
Mr. Roger Hall, MES (transmittal letter only)
Ms. Jennie Keys, MES (transmittal letter only)
Anniston Project File (one paper copy and one electronic copy on CD-ROM)
Denver Project File (one paper copy and one electronic copy on CD-ROM)