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July 11, 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 June 29, 2018 RE: *Land Use Control Effectiveness Report (LUCER) - 2017*; dated January 30, 2018

Dear Mr. Wilson:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (Matrix) is pleased to submit the Response to ADEM Comments dated June 29, 2018 on the 2017 *Land Use Control Effectiveness Report*; dated January 30, 2018. Also included is a redline strike out version to assist in your review.

Two hard copies and one electronic copy have been provided to Mrs. Brandi. 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 Evaluations dated June 29, 2018

RE: Response to ADEM Comments on *Land Use Control Effectiveness Report (LUCER) - 2017*; dated January 30, 2018

Specific Comment 1

Page 3, Section 2.2: The text states that the monuments and signs at Landfill 2 were in good condition. According to the Landfill Cover Inspection Checklist in Appendix B, one no digging sign was missing and reattached during the inspection. Please address.

MDA Response:

The text has been revised to state that “Monuments were in good condition. One no digging sign was reattached during the inspection.”

Specific Comment 2

Page 4, Section 2.3: The text states that cap inspection and repair work information for Landfill 3 is documented in the 2017 Annual Closure System Report, Landfill 3, Parcel 80(6) and Fill Area Northwest of Reilly Airfield (FANWR), Parcel 229(7) (2011 Landfill 3 Closure System Report), which is provided in Appendix C. Please revise the reference from 2011 to 2017.

MDA Response:

The text has been revised to reference “(2017 Landfill Closure System Report).”

Specific Comment 3

Page 5, Section 2.5: The text states that no digging signs were reattached or replaced during inspections of the Industrial Landfill. Please revise the text to state that two no digging signs were reattached or replaced as the original sentence gives the impression that none were.

MDA Response:

The text has been revised to state that “Two no digging signs were reattached or replaced during inspection operations in November 2017.”

Specific Comment 4

Page 6, Section 2.6: The text states that no digging signs were reattached or replaced during inspections of the Former Post Garbage Dump. Please revise the text to state that two no digging signs were reattached or replaced as the original sentence gives the impression that none were.

MDA Response:

The text has been revised to state that “Two no digging signs were reattached or replaced during inspection operations in November 2017.”

Specific Comment 5

Page 6, Section 2.7: The text states that monuments and signs at Fill Area North of Landfill 2 were installed, but does not mention findings during the annual inspection. According to the Landfill Cover Inspection Checklist in Appendix B, three no digging signs were missing and were reattached during the inspection. Please address.

MDA Response:

The text has been revised to state that “Monuments were in good condition. Three no digging signs were reattached during the inspection.”

Specific Comment 6

Page 7, Section 2.9: Please add the inspection date in this section to be consistent with all other sections.

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MDA Response:

The text has been revised to state that “A cap inspection was conducted for the Fill Area Northwest of Reilly Airfield on November 30, 2017.”

Specific Comment 7

Page 7, Section 2.10: The text states that Environmental Covenant FY-12-01.00 addresses land use controls (LUC) at Training Area T-38 and lists them. However, Environmental Covenant FY-12-01.01 repeals and replaces the previous covenant and should also be included in this section. Please address.

MDA Response:

The text has been revised to include “The MDA submitted Environmental Covenant Number FY-12-01.01 to ADEM for review on October 25, 2017 and will repeal and replace Environmental Covenant Number FY-12-01.00.”

Specific Comment 8

Page 8, Section 2.12: The text states that Environmental Covenant FY-12-01.00 addresses land use controls (LUC) at Antitank Range and Antitank Range: Former Rifle Range and lists them. However, Environmental Covenant FY-12-01.01 repeals and replaces the previous covenant and includes a groundwater restriction for this site. Please address.

MDA Response:

The text has been revised to include “The MDA submitted Environmental Covenant Number FY-12-01.01 to ADEM for review on October 25, 2017 and will repeal and replace Environmental Covenant Number FY-12-01.00.” Additional verbiage was added to include the groundwater restrictions for this site.

Specific Comment 9

Page 8, Section 2.13: The text states that Environmental Covenant FY-12-01.01 addresses LUCs at MRS-13 and lists them. However, Environmental Covenant FY-12-01.01 also includes a groundwater restriction for this site. Please address.

MDA Response:

The text was revised to include “a restriction on the consumptive or other use of groundwater except for monitoring purposes...”

Specific Comment 10

Page 11, Section 2.21: The text states that Environmental Covenant FY-15-01.00 addresses LUCs at MRS-1 and lists them. According to the covenant, residential use is also restricted for this site. Please address.

MDA Response:

The text has been revised to state “MRS-1 LUCs also include a restriction on residential use within the area of the MRS-1 boundary consisting of the entire Parcel 118Q-X and portions of Parcel 83Q as identified on the MRS-1 boundary map in the Covenant.”

Specific Comment 11

Page 12, Section 2.21: The text states that Environmental Covenant FY-17-02.00 addresses LUCs at MRS-11 and lists them. Please clarify why MRS-10 is not included in this section as it is included in the same covenant.

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MDA Response:

The MRS-10 description was included in the covenant because it is located within the boundary of MRS-11. However, there are no covenant use restrictions associated with MRS-10 and therefore was not included in this section.

Specific Comment 12

Page 13, Section 2.21: The text in Paragraph 4 states that munitions and explosives of concern warning signs are presented in Figure 2. Please label the figure as Figure 2.

MDA Response:

The figure has been labeled as "Figure 2".

Specific Comment 13

Page 15, Section 2.29: The text states that Environmental Covenant FY-15-01.00 addresses LUCs at Baby Bains Gap Road Ranges: Range 25 and lists them. According to the covenant, a prohibition on intrusive activities is also placed on this site. Please address.

MDA Response:

The prohibition on intrusive activities is confined to some roadways along the boundary of MRS-1 that were not cleared of munitions and explosives of concern to the depth detection and does not include Range 25.

Specific Comment 14

Table 1: Table 1 presents a summary of LUCs by site/parcel. This table includes all of the parcels listed in the bulleted list in Section 2.0 with the exception of Reilly Lake and Baby Bains Gap Road Ranges: Range 25. Please address.

MDA Response:

The Draft Final RFI (MES, January 2005), recommended LUCs for the Former Post Garbage Dump (Parcel 126(7)) and Fill Area East of Reilly (Parcel 227(7)) (Sections 2.6 and 2.8), however, LUCs for the Reilly Lake area were not recommended. On April 17, 2006, ADEM concurred with this recommendation and the RFI was subsequently finalized and dated May 2006. Upon selling or conveyance of the property, the transfer deed will rescind the deed restrictions in accordance with the RFI recommendations.

The residential use restriction for Baby Bains Gap Road Ranges: Range 25 is included on the third page of the Table 1.

Specific Comment 15

Appendix C: The 2017 Landfill 3 Closure System Report is included in Appendix C. The report states that "a few of the no digging signs had detached from the boundary markers and were reattached during the inspection." According to the on-site inspection maintenance forms in Attachment C1, one no digging sign was listed as damaged and replaced during inspection at FANWR. Please address.

MDA Response:

The text has been revised to state "One no digging signs had detached from the boundary markers and were reattached during the inspection."