

August 3, 2023

Ms. Ashley T. Mastin, 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

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**SUBJECT:** Response to ADEM Comments dated July 21, 2023, associated with the *Land Use Control Effectiveness Report – 2022, dated January 4, 2023*

Dear Ms. Mastin:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (MES) is pleased to submit Response to ADEM Comments dated July 21, 2023, associated with the *Land Use Control Effectiveness Report – 2022, dated January 4, 2023*. Also included are two copies of the revised document.

Please contact me at (256) 847-0780 should you have any questions or comments.

Sincerely,

**MATRIX ENVIRONMENTAL SERVICES, LLC**



Richard Satkin, P.G.  
McClellan Program Manager

Enclosure

CC: Mrs. Brandi Little, ADEM (two paper copies)  
Mr. Jason Odom, 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 21, 2023**

RE: *Land Use Control Effectiveness Report – 2022, dated January 4, 2023*

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### **Specific Comment 1**

**Page 2, Section 2.0:** *Please identify the acronym MRS in the bulleted list. Please also separate Training Areas T-31 and T-24A, which are included in the same bullet.*

#### **MDA Response:**

MRS acronym has been identified as requested. The two referenced sites have been separated into individual bullets.

### **Specific Comment 2**

**Page 11, Section 2.20:** *The document references modified environmental covenant, FY-12-04.01, and states that “revisions to the land use restrictions would allow residential use.” Please delete this erroneous statement as the text clarifies in the subsequent paragraph that only a surveyed area has been released for residential reuse.*

#### **MDA Response:**

Statement has been deleted.

### **Specific Comment 3**

**Page 11, Section 2.20:** *The text states that the revised environmental covenant FY-12-04.01 was filed in probate on March 16, 2022 and ADEM concurred with the revisions to the covenant on September 15, 2022. However, the covenant was signed by ADEM on March 9, 2022 and issued to MDA on March 10, 2022. ADEM concurred with the Request for Removal of Environmental Covenants on September 15, 2022. Please revise the text for clarity.*

#### **MDA Response:**

Text has been revised as noted.

### **Specific Comment 4**

**Table 1, Page 1 of 6:** *The land use controls (LUCs) presented for Landfill 4 and Industrial Landfill appear to be incomplete. The text states that groundwater restrictions are “pending completion of ADEM-required.” Please revise the table to include the groundwater restrictions in their entirety.*

#### **MDA Response:**

The text has been revised.

### **Specific Comment 5**

**Table 1, Page 2 of 6:** *The table lists LUCs presented in covenant FY-12-01.01 for Training Area T-38, Antitank Ranges and Munitions Response Site (MRS)-13. The use restrictions presented in*

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*the covenant also include a groundwater use prohibition for these sites. Please revise the table to include the groundwater use restriction.*

### **MDA Response:**

Groundwater use restriction has been added to the Antitank Ranges and MRS-13 in Table 1. The restriction was listed for T-38.

### **Specific Comment 6**

*Table 1, Page 2 of 6: Please revise the LUCs for Training Area T-6 and Cane Creek Training Area parcels to include restrictions presented in covenant FY-12-06.00.*

### **MDA Response:**

The LUCs have been updated.

### **Specific Comment 7**

*Figure 1: The table of contents lists Figure 1 as Security Gates. However, Figure 1 is titled Land Use Controls. Please revise either the table of contents or the title of the figure and please also include “Figure 1” on the figure.*

### **MDA Response:**

The table of contents has been revised and Figure 1 added to bottom of the page.

### **Specific Comment 8**

*Appendix B: The signature page for Landfill 1 cap inspection has an erroneous date of November 29, 2021. Please revise.*

### **MDA Response:**

The date has been revised.