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May 31, 2017

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:** Response to ADEM Comments dated April 28, 2017 on the *Land Use Control Effectiveness Report (LUCER) - 2016*; dated January 19, 2017

Dear Mr. Cobb:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (Matrix) is pleased to submit the Response to ADEM Comments dated April 28, 2017 on the 2016 *Land Use Control Effectiveness Report*; dated January 19, 2017. Due to the nature of the changes, Matrix is providing this revised LUCER as slip-pages only. Please update your existing copy of the report with the enclosed pages. Two hard copies of these pages have been provided to Mrs. Brandi Little and a pdf version will be sent via email. 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)

**Specific Comment 1**

*Page 4, Section 2.3, Paragraph 3: The text states that the 2015 Annual Closure System Report, Landfill 3, Parcel 80(6) and Fill Area Northwest of Reilly Airfield, Parcel 229(7) (2011 Landfill 3 Closure System Report) is provided in Appendix C; however, the report was not found in Appendix C. Please clarify where the referenced 2011 Landfill 3 Closure System Report is provided or if it is a typographical error.*

**MDA Response:**

The text has been revised to state “(2016 Landfill 3 Closure System Report) is provided in Appendix C.”

**Specific Comment 2**

*Page 8, Section 2.11, Paragraph 3: The text states that ADEM approved no further action for hazardous, toxic, and radioactive waste (HTRW) issues at Range 31 on July 31, 2013. "The Covenant will be resubmitted for ADEM review and concurrence in the future to reflect this determination." Please provide a timeline for submitting the revised covenant.*

**MDA Response:**

The MDA is currently revising Covenant FY-12-01.00 and we anticipate it will be submitted to ADEM for review within the next 120 days. However, this may need to be extended to allow adequate time to obtain signatures from the Federal Government because of the presence of the COBRA facility.

**Specific Comment 3**

*Page 14, Section 2.26: The text states that the Base Realignment and Closure (BRAC) team "agreed to no further action and unrestricted land reuse with regard to CERCLA-related hazardous substances for Parcel 184(7) in 2003. They also concurred with the recommendation that Parcel 185(7) be included in the investigation of Parcel 230Q-X because these parcels overlap on another. As such the next LUCER report will remove reference to Parcel 184(7)...." Please provide the title of the referenced document and date that ADEM provided concurrence.*

**MDA Response:**

The April 22-23, 2003 Fort McClellan BCT minutes documented the NFA concurrence and the June 12, 2003 BCT minutes accepted the April 2003 minutes as final. Both minutes are attached.

**Specific Comment 4**

*Page 14, Section 2.28: The text states that Training Area T-24A Parcels 112Q, 213Q and 214Q are "non-ESCA sites and are not on MDA property. As such the next LUCER report will remove references to these parcels." It is the Department's understanding that these three parcels, or portions of these parcels, are located on MDA property and are included in Section IV of the Cleanup Agreement with ADEM, but the Army is conducting the cleanup. Please address.*

**MDA Response:**

The Department is correct that portions of these parcels are located on MDA property. The text has been revised.

**Response to ADEM Review and Comments dated April 28, 2017**

RE: *Land Use Control Effectiveness Report (LUCER) - 2016*; dated January 19, 2017

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**Specific Comment 5**

*Appendix B: The Landfill Cap Inspection Checklist Items report for Fill Area East of Reilly, Parcel 227(7) is incorrectly presented as Parcel 222(7). Please revise.*

**MDA Response:**

The text has been revised to state Parcel 227(7).