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November 6, 2017

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 Evaluations dated October 6, 2017 on the Responses to ADEM Comments RE: *Land Use Control Effectiveness Report (LUCER) - 2016*; dated May 31, 2017

Dear Mr. Wilson:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (Matrix) is pleased to submit the Response to ADEM Evaluations dated October 6, 2017 on the 2016 *Land Use Control Effectiveness Report*; dated May 31, 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)

Response to ADEM Evaluations dated October 6, 2017

RE: Response to ADEM Comments on *Land Use Control Effectiveness Report (LUCER)* - 2016; dated May 31, 2017

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.

ADEM Evaluation: The April 2003 minutes state that "the BCT agreed to NFA for parcel 184, and to acknowledge that parcel 185 overlays parcel 230Q-X in that site's RI. The BCT also wants the wells on parcel 184 to be included in the RI effort for parcel 230Q-X." However, upon submittal of the December 2003 Draft Site Investigation for these parcels, the U.S. Environmental Protection Agency submitted comments on January 22, 2004, which included a recommendation that these parcels be included in the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) for Parcel 230Q-X due to uncertainties regarding nature and extent of contamination in the groundwater and the locations of training activities. ADEM did not comment or concur on the Draft Site Investigation because the sites were transferred to MDA in September 2003 to complete environmental cleanup. These parcels are also included in the Cleanup Agreement between MDA and ADEM in Part IV - Corrective Measures Implementation. Section IV.C.I. A. states that the land use controls for the Training Area T-31 parcels are "public access is not allowed and use of the property for any purpose is not allowed pending completion of the remedy." Without No Further Action (NFA) concurrence from ADEM on the remedy for these parcels, it is not appropriate to remove these sites from the LUCER.

MDA Response:

The MDA will continue to include Training Area T-31, Parcels 184(7) and 185(7) in the LUCER. The text has been modified accordingly to reflect this assessment.

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.

ADEM Evaluation: The revision to the text is noted. However, since portions of these parcels are located on MDA property and are included in the Cleanup Agreement between MDA and ADEM, MDA should continue to monitor the land use controls until such time as the Army completes its cleanup. These parcels should remain in the LUCER.

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MDA Response:

The MDA will continue to include Training Area T-24A, Parcels 112Q, 213Q and 214Q in the LUCER. The text has been modified accordingly to reflect this assessment.