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October 12, 2016

Ms. Julie Ange and Mrs. Brandi Little
Alabama Department of Environmental
Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

Subject: Cleanup Agreement No. A14 210 020 562
*After Action Report for Munitions Response Site 6 (MRS-6), McClellan, Anniston,
Alabama, Final Document March 2016*

Dear Ms. Ange and Mr. Lederle:

This letter is sent to respond to the follow up comment dated 6 September on the *After Action Report for Munitions Response Site 6 (MRS-6), McClellan, Anniston, Alabama, Final Document March 2016* on behalf of the McClellan Development Authority.

Please contact me at 404.414.7054 if you have any questions on this submittal.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC.

A handwritten signature in black ink that reads "Richard L. Satkin".

Richard L. Satkin, P.G.
Vice President

c: Robin Scott - MDA
Lisa Holstein – Army TF

Response to Follow-up ADEM Review Comment dated 06 September 2016
to *Munitions and Explosives of Concern (MEC) Remediation After Action
Report (AAR) Munitions Response Site 6 (MRS-6) McClellan, Anniston
Alabama* dated June 2015

Original Comment 1. Page 23, Section 4.1.3: The text states that the digital geophysical mapping (DGM) sensor was used to interrogate all no-find/geologic locations. However, the no-find data is not presented in the dig-sheets. Please provide the no-find data to demonstrate compliance with the data quality objective (DQO).

Original Response 1. All no find (0) and geologic (301) DGM targets were dug to a minimum of 2 feet and interrogated with an EM61MK2 during GeoQC. See the “Nature of Dig”, “Geo QC Comments” and “Initial Post Dig QC Readings”, and “Final post Dig QC Readings” fields of the Anomaly Tracking Information table for these DGM targets in the project database. It is not surprising that there were zero no-find locations as the center of the peak response of the targeted anomaly was previously identified, measured, and flagged during interrogation of each target with an EM61 MK2 during anomaly reacquisition. Any targets with less than a Channel 2 maximum amplitude of 10mV were removed and daughter targets were added as necessary during this process. Targets were deemed “geologic” if no metal was found after excavation to a minimum of two feet and reduction of the target response to less than 10 mV or local background.

Follow-up Comment 1. Target ID #1 (N114E027001) had an initial mV reading of 18.85 and a final mV reading after excavation to two feet of 22mV. No metal was found, the reading was above background and not reduced to below 10mV as stated in the response. Additionally, six other targets were also above 10mV and not reduced nor QC approved: CN114E033016, N104E0211S028, N104E0211S030, QAN122E018906, N119E019059, N116E019004. Please address.

Follow-up Response 1. Original response should have stated “... to less than 10mV or local background as approved by QC.” QC inspection of the 7 targets listed is documented in the Anomaly Tracking Information table. The (final) “GeoQC Comments” are the QC determinations reached by GeoQC team members working in conjunction with MES UXO QC.

In the 6 of the 7 cases indicated the (final) GeoQC determination was “Geologic Response”(see table below). The seventh was a DB mis-entry which should have been “Geologic Response” (now fixed). There are areas of MRS-6 and elsewhere where “hot” ferrous soil conditions yield EM61 responses >10mV without the presence of other metallic debris. In all cases where “Geologic Response” was indicated the target was investigated to a minimum of 24 inches and QC initially interrogated the dig with an EM61, intrusively investigated the hole as needed, and collected a final EM61 reading and documented the final QC acceptance. If the dig team failed QC on a target, a corrective action was performed until it could pass QC. This final “Geologic Response” entry is consistent with the documentation of QC acceptance utilized in previous MRS DBs which were accepted by ADEM.

Post Dig QC of DGM Geologic Targets

Target ID	Initial Post Dig QC Reading (mV)	Depth (inches)	Final Post Dig QC Reading (mV)	Geo QC Comments
N114E027001	25	24	22	Geologic Response
CN114E033016	20	24	3	Geologic Response
N104E0211S028	25	48	18	Geologic Response
N104E0211S030	23	24	19	Geologic Response
QAN122E018906	50	24	18	<10mv ²
N119E019059	16	24	13	Geologic Response
N116E019004	13	24	10	Geologic Response

Notes:

1. The 18.85 mV “initial mV” reading in ADEM’s follow-up comment was the Geosoft targeting “Grid Value mV” value. We have used the Initial Post Dig QC mV value in the table above.
2. Corrected to “Geologic Response”



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March 23, 2016

Ms. Julie Ange and Mrs. Brandi Little
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Subject: Cleanup Agreement No. A14 210 020 562
Transmittal of *After Action Report for Munitions Response Site 6 (MRS-6),
McClellan, Anniston, Alabama, Final Document March 2016*

Dear Ms. Ange and Mr. Lederle:

This letter is sent to forward copies of *After Action Report for Munitions Response Site 6 (MRS-6), McClellan, Anniston, Alabama, Final Document March 2016* on behalf of the McClellan Development Authority.

The UECA covenants for MRS-6 have been included in Appendix K of the Report.

Please contact me at 404.414.7054 if you have any questions on this submittal.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC.

A handwritten signature in black ink, appearing to read "Richard L. Satkin".

Richard L. Satkin, P.G.
Vice President

c: Robin Scott - MDA
Lisa Holstein – Army TF

Responses to ADEM Review Comments dated 22 January 2016 to
*Munitions and Explosives of Concern (MEC) Remediation After Action
Report (AAR) Munitions Response Site 6 (MRS-6) McClellan, Anniston
Alabama* dated June 2015

Comment 1. Page 23, Section 4.1.3: The text states that the digital geophysical mapping (DGM) sensor was used to interrogate all no-find/geologic locations. However, the no-find data is not presented in the dig-sheets. Please provide the no-find data to demonstrate compliance with the data quality objective (DQO).

Response 1. All no find (0) and geologic (301) DGM targets were dug to a minimum of 2 feet and interrogated with an EM61MK2 during GeoQC. See the “Nature of Dig”, “Geo QC Comments” and “Initial Post Dig QC Readings”, and “Final post Dig QC Readings” fields of the Anomaly Tracking Information table for these DGM targets in the project database. It is not surprising that there were zero no-find locations as the center of the peak response of the targeted anomaly was previously identified, measured, and flagged during interrogation of each target with an EM61 MK2 during anomaly reacquisition. Any targets with less than a Channel 2 maximum amplitude of 10mV were removed and daughter targets were added as necessary during this process. Targets were deemed “geologic” if no metal was found after excavation to a minimum of two feet and reduction of the target response to less than 10 mV or local background.

Comment 2. Page 23, Section 4.1.3: The text states that all munitions and explosives of concern (MEC) items were positively identified as to type, fuze, condition, and filler. Please provide data to support this claim such as the target dig-sheets and intrusive investigation results.

Response 2.. In the project databases Anomaly Final Disposition Table the type, fuze, condition, and filler are provided for each demolition item in the “FinalDisp”, “DemoItem”, “FireStat”, “FuzeStat”, “FuzeDetail”, and “OrdFill” fields.

Comment 3. Page 30, Table 4-3: The confirmation mapping results shown for grid CN109E031 indicate that 84 targets were identified but none were recovered. Similarly, other grids, such as CN112E035 and CN113E003, also had a high number of targets identified and a very small number of targets recovered. Please provide an explanation for the large difference in the number of targets identified and the number of items recovered.

Response 3. Confirmation DGM was performed over previously investigated and cleared grids with open holes and adjacent spoils piles. During the original investigation the spoils piles were flagged with a white pin flag to assist QC if residual bits of metal or hot rock were present, e.g. nails, small frag, wire, etc. As residual metal in these piles is now above the ground surface, they are closer to the detectors and have higher and often targetable DGM response. See Database Anomaly Tracking Table Reac Comments - during EM61 interrogation of each target during reacquisition of the confirmation mapping targets, most of these targets were determined to be either sourced from the spoils piles such that there was no single large piece of metal or the target had less than 10mV response when the spoils pile was spread back to ground level.

Comment 4. No digital geophysical mapping (DGM) data is provided for Tract 6-A. The data was collected and shown in the Mosaic file but was not included in the report.

Please add the data to Appendix D.

Response 4. Tracts 6A and 6B (McClellan Park System) were mag and dig clearances to one foot tract. No DGM data was collected for these tracts and DGM data is not shown on the DGM mosaic (Figure 2-1) for these tracts. DGM-based clearance to depth of detection was performed for Tracts 6C and 6D and DGM data is provided for these tracts.

Comment 5. Appendix E: The scrap collection reports do not provide any tracking or clarification whether the scrap being inspected and stored is cultural debris or munitions debris. Please provide the details of the scrap handling process by category so that it is consistent and follows the "cradle to grave" method.

Response 5. Appendix E surveillance reports for scrap inspections address both munitions- debris and cultural/other debris. UXO teams coming out of the field placed their buckets of scrap on the loading dock near the locking rolloff containers for MDAS and cultural/other debris (OD). MDAS and OD underwent final inspection simultaneously before being placed and locked in the appropriate container. Disposal records by category including Form 1348s and certification of final disposal are included in Appendix H. We have modified the file names to be more descriptive.

Comment 6. Appendix F: The USAE Environmental daily reports are not signed by the Senior Unexploded Ordnance Supervisor (SUXOS) or the Project Manager. Please include a statement as to why these documents are not signed.

Response 6. USAE electronic Daily Report forms were emailed daily to MES without a hardcopy signature. They were prepared daily by the USAE SUXOS David Wilson and the signature was overlooked. A statement "USAE Dailys Memo" was included in Appendix F in the USAE Dailys folder as requested.

Comment 7. Appendix J: The quality assurance (QA) grid acceptance for clearance to depth grids in Tract 6-D reports on multiple sheets that "all targets checked were below threshold". There is not a digital threshold on the handheld detectors used in the aggressive surface clearance procedure. The instruments used provide no recordable feedback to the operator. Please revise these forms to use a "pass/fail" criteria.

Response 7. Agree. Normally the forms would be revised going forward, but as fieldwork is complete, a memo noting this and indicating that it should be read as "all targets passed inspection criteria" for the clearance to one foot tracts was placed in the Appendix J "QC QA acceptance for grids" folder. This does not affect any of the results.