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March 1, 2018

Mr. William Duke and Mrs. Brandi Little
Alabama Department of Environmental
Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

Subject: Cleanup Agreement No. A14 210 020 562
Transmittal of *After Action Report for Munitions Response Site 3 (MRS-3),
McClellan, Anniston, Alabama*

Dear Mr. Duke and Mrs. Little:

This letter is sent to forward copies of responses to comments and the final *After Action Report for Munitions Response Site 3 (MRS-3), Bravo Munitions Response Area, McClellan, Anniston, Alabama (March 2018)* 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
Tom Bourque - UXOPro

Responses to ADEM Review Comments dated 20 February 2018 to
*Munitions and Explosives of Concern (MEC) Remediation After Action
Report (AAR) Munitions Response Site 3 (MRS-3) McClellan, Anniston
Alabama* dated 8 January 2018

Comment 1. Page iii, Executive Summary, Third Paragraph: This section states, "438 QC seeds (1.8 per acre) were placed to test aggressive (6 inch) surface and near surface clearance (not final product) operations and 434 (99.1%) were recovered. 264 QC seeds (1.4 per acre) were placed to test clearance to 1 foot operations and 261 (98.9%) were recovered. 453 QC seeds (1.7 per acre) were placed to test clearance to depth operations and 452 (99.8%) were recovered. Both DGM and non-DGM (data gap) areas were seeded. Of the 1,155 QC seeds placed to test final product clearance work, 1,147 (99.3%) were recovered." The text reads as though eight seeds were never recovered. Please address.

Response 1. All missed seeds were, after issuance of DNRs, recovered during rework. This wording has been consistently used in all the previous ADEM-approved McClellan AARs to provide numerical metrics for the seeding performed. We do not think that this warrants any changes to the document.

ADEM Evaluation of Response to Comment 1: Though it may be understood by those ADEM and MDA personnel that are familiar with munitions response activities that all blind seeds placed to ensure quality assurance/quality control (QA/QC) are achieved during site removal activities are eventually removed, this may not be clear to the majority of the general public. Therefore, please include text to clarify the fact that all missed blind QC seeds were recovered during rework of the area.

Follow-up Response 1. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.

Comment 2. Page 1, Section 1.0 Introduction, Second Paragraph: This section states, "Of 1,211 QC and QA blind seeds emplaced to test the effectiveness of the clearance, only eight were missed - 99.3% were recovered". The text reads as though eight seeds were never recovered. Please address.

Response 2. All missed seeds were, after issuance of DNRs, recovered during rework. This wording has been consistently used in all the previous ADEM-approved McClellan AARs to provide numerical metrics for the seeding performed. We do not think that this warrants any changes to the document.

ADEM Evaluation of Response to Comment 2: Please see Evaluation of Response to Comment 1.

Follow-up Response 2. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.

Comment 3. Page 3, Section 1.1 Project Description and Objective: Although this section

is titled "Project Description and Objective", the section only summarizes the activities performed and does not state the objective of the project. Please address.

Response 3. The project objective was the "MEC remediation of MRS-3" as indicated in the first sentence of this section.

ADEM Evaluation of Response to Comment 3: This comment has been adequately addressed.

Comment 4. Page 10, Section 2.1 Field Change Requests, Table 2-1: The field change requests (FCRs) within Table 2. 1 begin at number five while no explanation is given regarding FCRs one through four. Please address FCRs numbered one through four and, if they are not applicable, please explain the reasoning behind this decision.

Response 4. Multiple MRSs were being worked simultaneously under the programmatic work plan and the site specific work plan addenda. As many FCRs either applied to the programmatic work plan or addressed changes in procedures which applied to multiple MRSs, FCRs were numbered consecutively to minimize potential future confusion.

ADEM Evaluation of Response to Comment 4: This comment has been adequately addressed.

Comment 5. Page 35, Section 4.8 QC Seeding: Please see Specific Comment number two above.

Response 5. Please see the response Specific Comment number 2 above.

ADEM Evaluation of Response to Comment 5: Please see Evaluation of Response to Comment 1.

Follow-up Response 5. "All missed blind seeds were subsequently recovered during rework." was added after each relevant instance in the text.