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June 18, 2015

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
Transmittal of Responses to Comments and the *After Action Report for Munitions
Response Site 7 (MRS-7), McClellan, Anniston, Alabama Final Document*

Dear Ms. Ange and Mr. Lederle:

This letter is sent to forward copies of responses to comments and the *After Action Report for Munitions Response Site 7 (MRS-7), McClellan, Anniston, Alabama* 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, appearing to read "Richard L. Satkin".

Richard L. Satkin, P.G.
Vice President

c: Robin Scott - MDA
Lisa Holstein – Army TF
Bob Bohn – UXOPro

Responses to ADEM Review Comments dated 19 March 2015 to
*Munitions and Explosives of Concern (MEC) Remediation After Action
Report (AAR) Munitions Response Site 7 (MRS-7) McClellan, Anniston
Alabama* dated December 2014

Comment 1. Page 1, Line 14: The text states that a total of 2,458 pounds of non-MEC scrap and 16,441.5 pounds of MEC scrap were removed from the site. However, the Executive Summary (page iii, line 7) reverses the numbers for MEC and non-MEC scrap. Please revise the text appropriately.

Response 1. The text was revised to indicate that MEC scrap was 2,458 lbs. and non-MEC scrap was 16,441.5 lbs.

Comment 2. Pages 1 and 2: Section 1.0 does not identify the tracts where each MEC subcontractor performed operations. Please provide this information in the report.

Response 2. Tracts where each contractor worked have been added to the bullets as requested.

Comment 3. Page 8, Line 22: The Garrett Recon Pro analog geophysical sensor with the regular search head is listed as an approved instrument for clearance of data gaps. Field change request #18 (FCR-18) approved the UXO head for clearance to depth operations but not the regular head. Please verify that the regular search head was not used for clearance of data gaps in clearance to depth areas.

Response 3. We verify that only the (Garrett) UXO head was utilized for clearance to depth operations. The text on the data gap bullet on page 8 was revised accordingly.

Comment 4. Page 11, Line 18: Please add a reference to the location of the maps showing the data gap areas.

Response 4. The text was revised as follows “These data gaps, called non-DGM (clearance) areas, were identified on the DGM grid maps (Appendix D) for separate clearance using hand held instruments.”

Comment 5. Page 12, Line 9: Section 2.8.2 states that the target selection threshold was 7 mV while Sections 2.9 and 2.10.1 state that the threshold was 10 mV. Please confirm which value is correct and revise the report accordingly.

Response 5. Both are correct. The DGM data target selection threshold was 7 mV. Subsequent interrogation of the targeted anomalies with an EM61 operated in analog mode during reacquisition precisely located and measured the peak amplitude of each target. The reacquisition peak amplitude threshold was 10 mV. The text in Sections 2.9 and 2.10.1 has been clarified regarding the targeting and reacquisition thresholds.

Comment 6. Page 19, Section 4.1: Please include a statement indicating whether or not each data quality objective (DQO) was achieved. Also, if a DQO was not achieved, please indicate the reason and discuss any associated effects on the usability of the data to support decision making.

Response 6. The text was revised to include the DQO attainment information requested. All DQOs were met except we didn't quite get 100% of QC seeds (517/520 - 99.4%) and the data was of acceptable quality and utility for decision making.

Comment 7. Page 22, Lines 21 to 23: The report states that unit of production (UoP) certification shifted during the project from randomly selected grids to those with blind seed quality control (QC) items. Please provide an explanation in the report describing

the rationale behind this change.

Response 7. The text was supplemented to state this was because the blind (but locations known to the GeoQCS) QC seed locations were useful for confirming both positional accuracy and anomaly targeting in the data during QC data evaluation and reprocessing. The QC seeds were located randomly within the UoPs so the reprocessing grid selection remained random.

Comment 8. Page 27, Line 21: Section 4.6 states that QC confirmation remapping was performed on 45 of 768 grids. Appendix E, however, indicates that 64 grids were remapped after intrusive investigation and 12 were remapped before. Section 10.5 of the work plan requires 10-30% remapping. Please confirm the correct number of confirmation grids that were remapped and revise the text appropriately. Also, please indicate whether or not the DQO was met.

Response 8. See text in Section 4.6.1. The DQO of 10-30% remapping was met with a combination of QC and QA remapping totaling 10.8% of the DGM area (1.7% predig + 9.1% postdig) in accordance with the MRS-7 and MRS-9A remapping plan which was concurred on by ADEM in June 2013. The text has been revised and clarified to indicate that the remapping DQO was met. We note that there a number of partial grids on the MRS perimeter and in step outs such that the 76 grids total greater than 10% of the MRS DGM area.

Comment 9. Pages 20 and 21, Sections 4.2 and 4.3: Please provide a reference to the location of inspection documentation for each item being discussed in these sections.

Response 9. As requested, the directories in QC Appendix E where specific QC documentation can be found have been added to the text. For example QA/QC inspection reports are in Appendix E (QC Acceptance) directory.