

August 28, 2023

Ms. Ashley T. Mastin, 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 August 8, 2023, associated with the *Resource Conservation Recovery Act Facility Investigation (RFI) Report for Impact Area South of Prisoner-of-War Training Facility Former Rifle/Machine Gun Ranges, Parcels 100Q and 101Q; dated September 8, 2022*

Dear Ms. Mastin:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (MES) is pleased to submit Response to ADEM Comments dated August 8, 2023, associated with the *Resource Conservation Recovery Act Facility Investigation (RFI) Report for Impact Area South of Prisoner-of-War Training Facility Former Rifle/Machine Gun Ranges, Parcels 100Q and 101Q; dated September 8, 2022*. Also included are two copies of the revised document.

Please contact me at (256) 847-0780 should you have any questions or comments.

Sincerely,
MATRIX ENVIRONMENTAL SERVICES, LLC



Richard Satkin, P.G.
McClellan Program Manager

Enclosure

CC: Mrs. Brandi Little, ADEM (two paper copies)
Mr. Jason Odom, MDA (transmittal letter only)
Ms. Lisa Holstein, U.S. Army (one paper copy)
MES Files (one paper copy)

Response to ADEM Review and Comments dated August 8, 2023

RE: Resource Conservation Recovery Act Facility Investigation (RFI) Report for Impact Area South of Prisoner-of-War Training Facility Former Rifle/Machine Gun Ranges, Parcels 100Q and 101Q; dated September 8, 2022

General Comment 1

The following acronyms are not identified when they are first presented in the document: Eco-SSL, MDA, USACE, and UXO. Please revise the text. Please also add GPS and LANL to the List of Acronyms.

MDA Response:

Text has been revised as requested. Missing acronyms have been added to List of Acronyms.

Specific Comment 1

***List of Acronyms and Abbreviation:** COPC is identified as constituent of potential concern in the list and as chemical of potential concern in the text. Please use one term consistently throughout the document. Please also revise mg/L to milligrams per liter and Eco-SSL to ecological soil screening level.*

MDA Response :

Acronyms and Abbreviations have been revised as requested.

Specific Comment 2

***Page 1-1, Section 1.0, Paragraph 3 :** The text states that the cleanup agreement (CA) between MDA and ADEM was amended most recently in February 2014. Please revise the text to include the last CA modification dated July 2019.*

MDA Response:

Text updated as requested.

Specific Comment 3

***Page 3-1, Section 3.1, Munitions Remediation and Bullet Pickup:** This section references the Corrective Measures Implementation Report (CMIR) that the Department concurred with in an April 14, 2015 letter. Please revise the text to state that the CMIR was for the Firing Line Areas and was dated September 2014, not December 2014.*

MDA Response:

Text revised as requested.

Specific Comment 4

***Page 3-5, Section 3.4. Analytical Program:** This section lists samples collected and the Environmental Protection Agency (EPA) analytical methods used. Two bullets list target analyte*

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list metals – EPA Method 6010B17000. Please revise the text in both bullets to state EPA Method 6010B/7000.

MDA Response:

Text revised as requested.

Specific Comment 5

Page 5.2. Section 5.1. Surface Soil Analytical Results: *Both bulleted lists present background values for lead at 40 mg/kg (milligrams/kilogram). Figure 5-1 also lists the background value for lead at 40 mg/kg. However, Table 5-1 lists the lead background value at 40.1 mg/kg. Please revise the text to be consistent throughout the document.*

MDA Response:

Table 5-1 has been revised.

Specific Comment 6

Pages 5-3 and 5-4. Section 5.1. Surface Soil Analytical Results: *The bulleted list at the bottom of Page 5-3 and top of Page 5-4 lists the ecological screening values (ESV) for copper at 28 mg/kg and lead at 11 mg/kg. However, Table 5-1 lists the ESV for copper at 40 mg/kg and for lead at 50 mg/kg. Please revise.*

MDA Response:

As discussed in Section 5.0, Table 5-1 summarizes results from the Site Investigation performed by IT in 2000 and references the ESVs used in the risk evaluation at that time. The ESVs on pages 5-3 and 5-4 for copper and lead are the current ESVs. No revisions made to the text.

Specific Comment 7

Page 5-7. Section 5.3. Groundwater Results: *In the sixth paragraph, the text states that herbicides were not detected in the sample collected at MW-02. However, in Appendix F, two samples are presented for MW-02 and the second one shows two herbicides (2,4-DB and Dinoseb) were detected and J-flagged. Please address.*

MDA Response:

The MW-02 field duplicate sample contained very trace level estimated detections of 2,4-DB (0.00028J mg/L) and Dinoseb (0.00016J mg/L) that are below human health and ecological screening levels. The results were estimated (J flag) because they are below the reporting limit but above the method detection limit. The tapwater EPA RSL for Dinoseb is 0.0015 mg/L which is an order of magnitude higher than the reported estimated value of 0.00016J mg/L. The ESV for Dinoseb is 0.00048 mg/L which is also higher than the reported value. There are no RSLs or ESVs for 2,4-DB however, the chemical is similar to 2,4-D which has an MCL of 0.7 mg/L, a tapwater

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EPA RSL of 0.017 mg/L, and an ESV in surface water of 0.079 mg/L, all which are well above the measured trace concentration. The text has been revised to note the trace level detections of the duplicate sample.

Specific Comment 8

Table 3-1. This table is missing Page 1 of 2 in the printed document and the digital copy. Please address.

MDA Response:

The missing page has been added.

Specific Comment 9

Figure 5-2: This figure presents background for copper at 12.6 mg/kg and the ESV at 28 mg/kg. Table 5-1 lists the background value as 12.7 mg/kg and the ESV at 40 mg/kg. Please revise the figure to be consistent with the document.

MDA Response:

Figure 5-2 has been revised to be consistent with Table 5-1. See response to Comment #6.

Specific Comment 10

Appendix F: This appendix presents the analytical data from all samples collected. The samples contain J, B, P, R, and U qualifiers. Please provide a key for each qualifier.

MDA Response:

This key has been added in Appendix F before the 2022 sample results.

J – Result is less than the reporting limit but greater than or equal to the method detection limit and the concentration is an approximate value.

B – Compound was found in the blank and sample.

P – Gas chromatography or High-performance liquid chromatography confirmation criteria exceeded.

R – Data are not useable

U – Indicates the analyte was analyzed for but not detected.