

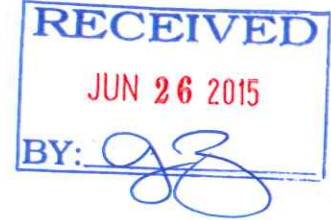
LANCE R. LEFLEUR
DIRECTOR



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ROBERT J. BENTLEY
GOVERNOR



June 24, 2015

Mr. Robin Scott
Chief Executive Officer
McClellan Development Authority
4975 Bains Gap Road
Anniston, Alabama 36205

RE: ADEM Review and Concurrence: Risk Management Plan, Revision 4- Calculation of Risk Management-1 Risk-Based Target Levels to meet Alabama Risk-Based Corrective Action Guidance dated June 19, 2015
Fort McClellan, Calhoun County, Alabama
Facility I.D. AL4 210 020 562

Dear Mr. Scott,

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the McClellan Development Authority's (MDA) subject document. MDA submitted the subject document (replacement pages) in response to the attached informal ADEM comment sent via email on June 5, 2015. Based on this review, ADEM has determined that all comments regarding the *Risk Management Plan* have been resolved and concurs with the overall content of the subject document.

If you have any questions or concerns regarding this matter please contact Ms. Kaneshia Townsend at 334-394-4356 or via email at ktownsend@adem.state.al.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Cobb".

Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

SAC/ATM/KLT/akr

cc: Mr. Richard Satkin/Matrix
Ms. Lisa Holstein/Army
Ms. Ashley Mastin/ADEM
Ms. Brandi Little/ADEM

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ATTACHMENT
ADEM Informal Comment
Risk Management Plan, Revision 3 – Calculation of Risk Management-1
Risk-Based Target Levels to meet Alabama Risk-Based Corrective Action
Guidance dated April 24, 2015
Fort McClellan, Alabama

1. The Technical Memorandum should document the approach that sites will meet a cumulative cancer risk level of $1E-05$, as stated in Supplement to Response to General Comment 1, Explanation of Risk Additivity in Setting Final Clean-up Levels:

“The final potential remedies for each site will be evaluated in the context of the total risks to ensure that the overall risk target of $1E-05$ has been met for each potential receptor. A similar approach will be taken for total hazard, which must not exceed 1.0. However, unlike cancer risk, noncarcinogenic hazards may be evaluated separately for each target organ, with a total target Hazard Index of 1.0 for each organ system (in accordance with USEPA guidance and ARBCA Section 2.7).”

This text should be added to the Notes and Decision Inputs Used for the Development of RBTLs section of the Technical Memorandum. Please address.

MDA Response: Submittal of replacement pages dated June 19, 2015 incorporating the above text.

ADEM Evaluation: Response is adequate and comment is resolved.