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# Transmittal

**To:** Mrs. Brandi Little **VIA:** Fed Ex  
Governmental Hazardous Waste Branch Land Division  
**Address:** Alabama Department of Environmental Management  
P.O. Box 301463  
Montgomery, Alabama 36130-1463  
**Phone:** (334) 274-4226  
**Date:** October 6, 2011  
**From:** Jennifer Keys  
**Re:** McClellan Former Base Service Station, Building 2109, Parcels 21(7) and 22(7)

Urgent  For Review  Please Comment  Please Reply  As Requested

Dear Mrs. Little:

Attached please find a revised letter dated October 6, 2011 making the revisions requested in ADEM's September 30, 2011 Review and Comment Letter associated with the Amendment to the *Final Groundwater Sampling Report, June 2006* and Request for No Further Action without Land Use Controls at the Former Base Service Station, Building 2109, Parcels 21(7) and 22(7).

Kind regards,

Jennie Keys

Enclosures:

Revised Letter Request dated October 6, 2011

CC: Mr. Robin Scott, MDA (one paper copy)  
Ms. Lisa Holstein, U.S. Army (one paper copy)  
Mr. Richard Satkin (one paper copy)  
Mr. Roger Hall (one paper copy)  
Anniston Project File (one paper copy)  
Denver Project File (one paper copy)



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Original: May 10, 2011  
Revised: October 6, 2011

Mr. Stephen A. Cobb, 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: Amendment to the *Final Groundwater Sampling Report, June 2006* and  
Request for No Further Action without Land Use Controls  
Former Base Service Station, Building 2109, Parcels 21(7) and 22(7)  
McClellan, Anniston, Alabama**

Dear Mr. Cobb:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (MES) submitted the *Final Groundwater Sampling Report, June 2006, Former Base Service Station, Building 2109, Parcels 21(7) and 22(7) (Groundwater Sampling Report)* dated October 2009. The *Groundwater Sampling Report* incorporated the responses to the Alabama Department of Environmental Management's (ADEM) comments on the draft report.

With completion of the *Groundwater Sampling Report*, the MDA requested a No Further Action designation with Land Use Controls restricting the use of groundwater for direct use or ingestion at the Former Base Service Station, Building 2109, Parcels 21(7) and 22(7). This restricted reuse was due to the concentration of benzene in one groundwater well (UST-22-MW01) that was above the Site-Specific Screening Level (SSSL = 0.923 µg/L). SSSLs are based on a  $10^{-6}$  carcinogenic risk and 0.1 non-carcinogenic hazard as cited in the *Groundwater Sampling Report*.

The *Alabama Risk-Based Corrective Action Guidance Manual (ARBCA)* (ADEM, 2008), allows a cumulative carcinogenic risk for remediation of  $10^{-5}$ , and a noncarcinogenic cumulative hazard index of less than or equal to 1. Therefore, Risk-Based Target Levels (RBTLs) ( $10^{-5}$  carcinogenic risk and 1 non-carcinogenic hazard) are actually the site-wide cleanup standards appropriate for use at McClellan. Table 4-1 in the *Groundwater Sampling Report* has been revised and has been attached to this transmittal for your review. The sample results are summarized, but now compare these values to the RBTLs. Based on this comparison, the benzene concentration in UST-22-MW01 is less than the RBTL of 9.23 µg/L.

This letter serves as the request for a No Further Action and unrestricted reuse. Pending

approval of this revision, the MDA requests the following changes to the Cleanup Agreement between the MDA and the ADEM.

- If acceptable to ADEM, the MDA requests modification of **Table III.2 [List of SWMUs and AOCs requiring no further action (NFA) at this time]** to remove the LUC requirement.
- Also, the MDA requests deleting the text in **Section IV.C.2.D** and removing the site from **Table VI.1**.
- If the above changes are acceptable to ADEM, the MDA also requests updates to **Tables I.1 and I.2** adding this document as a decision document.

It is understood that this request may trigger a 45-day public comment period if ADEM considers this a major permit modification. In addition, a deed notification will also be provided to inform future property owners of the historical use as a military installation.

This document was completed in accordance with the requirements of the Cleanup Agreement (CA) between the MDA and the ADEM and is being provided to ADEM in partial fulfillment of the requirements set forth in the Environmental Services Cooperative Agreement (ESCA) between the MDA and the Army. Two hard copies of this letter and the revised table have been provided to Mrs. Brandi Little.

It has been a pleasure working with you on this program. Please contact me at (770) 594-0331 with questions or comments regarding this transmittal.

Sincerely,

**MATRIX ENVIRONMENTAL SERVICES, LLC**



Richard Satkin, P.G.

McClellan Program Manager

CC: Mrs. Brandi Little, ADEM (two paper copies)  
Mr. Robin Scott, MDA (one paper copy)  
Ms. Lisa Holstein, U.S. Army (one paper copy)  
Mr. Roger Hall (one paper copy)  
Ms. Jennie Keys (one paper copy)  
Anniston Project File (one paper copy)  
Denver Project File (one paper copy)

**REVISED**

**Table 4-1: Summary of Groundwater Detections Compared to RBTLs  
Former Base Service Station, Building 2109, Parcels 21(7) and 22(7)  
McClellan, Anniston, Alabama**

Parameter (µg/L)	Residential	UST-21-MW06	UST-21-MW10	UST-21-MW11	UST-21-MW15
	RBTL	6/14/2006 Residuum	6/14/2006 Residuum	6/14/2006 Residuum	6/14/2006 Residuum
Benzene	9.23	0.79 J	< 1.0	< 1.0	< 1.0
Ethylbenzene	1400	< 1.0	< 1.0	< 1.0	< 1.0
Toluene	2,940	0.55 J	< 1.0	< 1.0	< 1.0
Xylenes (total)	9,120	1.15 J	< 3.0	< 3.0	< 3.0

Parameter (µg/L)	Residential	UST-21-MW20	UST-21-MW22	UST-22-MW01
	RBTL	6/14/2006 Residuum	6/14/2006 Residuum	6/14/2006 Residuum
Benzene	9.23	< 1.0	< 1.0	2.1
Ethylbenzene	1400	< 1.0	< 1.0	< 1.0
Toluene	2,940	< 1.0	< 1.0	< 1.0
Xylenes (total)	9,120	< 3.0	< 3.0	< 3.0

**Notes:**

< = The result was not detected at the concentration shown.

FD = Field duplicate

µg/L = micrograms per liter

RBTL = Risk-based Target Level

The Xylene (total) value is a sum of m,p-Xylene and o-Xylene detections.

**Lab Flags:**

J = Estimated value. The analyte is positively identified and the concentration is less than the reporting limit (RL) but greater than the method detection limit (MDL).