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May 3, 2012

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: Response to ADEM Review and Comments: *Range 12: Iron Mountain Road Ranges Maintenance and Inspection Plan*, dated February 24, 2012 Fort McClellan, Calhoun County, Alabama Facility I.D. No. AL4210 020 562

Dear Mr. Cobb:

On behalf of the McClellan Development Authority (MDA), Matrix Environmental Services, LLC (MES) is pleased to submit the Response to ADEM's Comments dated February 24, 2012 regarding the *Range 12: Iron Mountain Road Ranges Maintenance and Inspection Plan*, dated March 23, 2010 for your review.

We respectfully request you consider our suggested monitoring approach at this site, rather than expending resources developing a full Erosion Control and Best Management Practices Plan. Such an approach will be utilized at the time a lead remediation is accomplished on the remaining up-gradient portion of this range. We believe the photographs support a "No Harm, No Cure" approach. We would strongly suggest a site visit to support our contention of "No Harm".

Two hard copies of these responses to comments have been provided to Mrs. Ashley T. Mastin. If you have any questions or need further information, please contact me at (256) 847-0780.

Regards,

A handwritten signature in black ink that reads "Roger Hall".

Roger Hall, P.E.  
McClellan Program Manager

cc: Mr. Robin Scott, MDA  
Mr. Roger Hall, MES  
Mr. Scott Bolton, U.S. Army Transition Force  
Anniston Project File  
Denver Project File

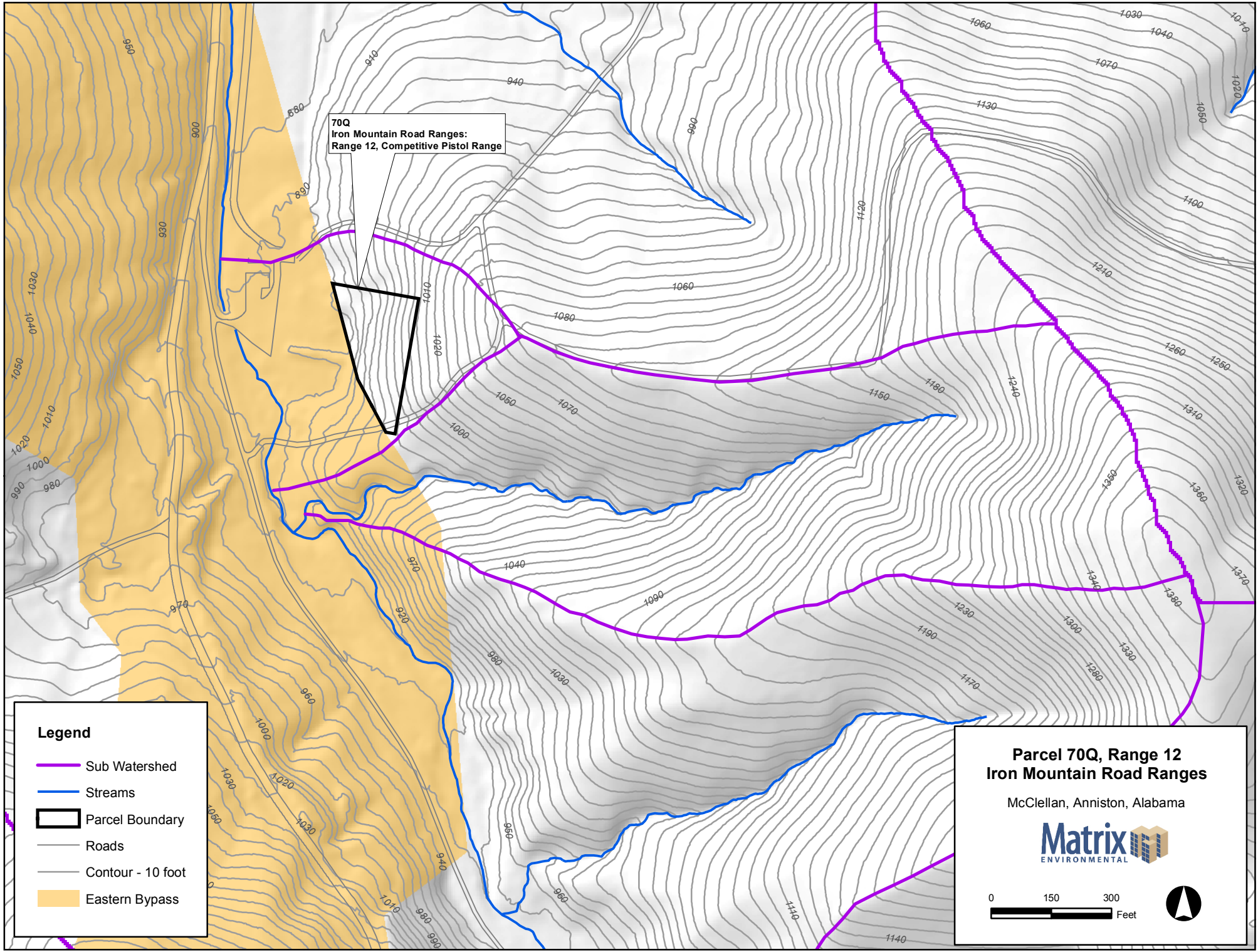
Enclosures

**Response to Comments**  
**ADEM Review Comments Dated February 24, 2012**  
**Range 12: Iron Mountain Road Ranges Maintenance and Inspection Plan**  
**McClellan, Anniston, Alabama**

Comment	Response to Comment
<b>General Comments</b>	
1. Please provide a drawing of the area containing best management practices (BMPs) including topography contours and drainage patterns.	Matrix has attached a 1ft Lidar map of parcel 70Q. We have shown drainage features, as few as exist, on the attached map. The BMPs installed by Shaw, which include silt fence, are in some disrepair. However, removal, or an attempt to upgrade the silt fence will not increase stability of the site.
2. The Plan indicates that the site will be inspected quarterly or as often as needed. Please clarify what is meant by “as needed”. Also, the BMPs should be inspected after significant rainfall events (i.e., one inch or greater in one hour or less). Please address.	The original Plan, submitted in March 2010, did include the phrase “inspected quarterly or as needed”. During the October 2011 inspection, it was noted, photographed, and documented that the site was being “reclaimed by nature”. All of the photos taken, if placed in a time sequence, clearly show no erosion taking place on the site. The soil portion of the disturbed area has now established native small trees with roots holding the soil in place. Please note that no erosive sediment has build up along the ALDOT fence and no sediment has been observed in the grassy area down slope of the fence. This indicates that stabilization is progressing rapidly and quarterly inspections are not needed. This is the reason for the yearly inspection request in the October report.
3. The Plan does not specify if or when an inspection report would be submitted to the Department. Please address.	Matrix will perform one annual inspection, in the early spring, and submit a letter report, complete with photos documenting the site conditions.
4. Please provide a checklist of inspection and maintenance activities in inspection reports.	Matrix does not believe any maintenance or improvements of existing BMPs is required or will help to further slope

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<b>Comment</b>	<b>Response to Comment</b>
	stabilization. Any attempt to access the slope to straighten silt fence or wooden boards will cause more migration of sediment than leaving the existing BMPs intact.
5. Please include descriptions of maintenance activities and a schedule for the activities if appropriate.	No maintenance activities, other than initial slope stabilization BMPs, have been performed at the site.
6. Please include discussion on how it will be determined that the slope at the site has been permanently stabilized so that the BMPs can be removed and the site no longer requires inspection.	<p>It is Matrix's opinion that the slope is presently stabilized. Instability would show itself as sediment accumulated at the toe of the slope. Presently no accumulation of sediment exists either along the fenced base of the slope or in the grass filter beyond the ALDOT fence. There are no flow features on the entire site, as noted on the attached figure.</p> <p>When the MDA decides to prioritize funding for lead removal projects along this portion of Iron Mountain Road, it may become necessary to disturb the upgradient area adjacent to the site. Matrix feels this is the appropriate time to review the need for BMPs for the area. Until such time, we propose that no harm is being done to the site environment and no sediment is leaving the site.</p>
7. According to the attached pictures, there are no controls upgradient of the erosion area to prevent storm water drainage from continuing to erode the site. Please address.	It is our contention that with the absence of any erosion feature, sediment transport, or drainage features having been formed, there is no significant stormwater drainage entering the site from upgradient.



70Q  
Iron Mountain Road Ranges:  
Range 12, Competitive Pistol Range

**Legend**

- Sub Watershed
- Streams
- Parcel Boundary
- Roads
- Contour - 10 foot
- Eastern Bypass

**Parcel 70Q, Range 12  
Iron Mountain Road Ranges**

McClellan, Anniston, Alabama

**Matrix**  
ENVIRONMENTAL

0 150 300 Feet