



Alabama Department of Environmental Management  
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

May 24, 2012

Mr. Scott Bolton  
Site Manager  
US Army Transition Force  
P.O. Box 5022  
Fort McClellan, Alabama 36205

RE: **Acknowledge Receipt**  
Submittal of *Land Use Control Assurance Plan (LUCAP)*; dated March 21, 2012  
Fort McClellan, Calhoun County, Alabama  
Facility I.D. No. AL4210020562

Dear Mr. Bolton:

The Alabama Department of Environmental Management (ADEM or the Department) received the Army's *LUCAP* on March 22, 2012. The subject document was reviewed by the Governmental Compliance Unit and is considered to be complete.

If you have any questions concerning this matter, please contact Mrs. Brandi Little of the Remediation Engineering Section at 334-274-4226 or via email at [blittle@adem.state.al.us](mailto:blittle@adem.state.al.us).

Sincerely,

Brandi C. Little  
Governmental Hazardous Waste Branch  
Land Division

cc: Mrs. Tracy P. Strickland/ADEM  
Ms. Leigh Lattimore/EPA Region 4  
Mr. Robin Scott/MDA





DEPARTMENT OF THE ARMY  
U.S. ARMY GARRISON  
FORT McCLELLAN, ALABAMA 36205-5000

March 21, 2012

REPLY TO  
ATTENTION OF

Office of the Site Manager

Mr. Stephen A. Cobb  
Alabama Department of Environmental  
Management (ADEM)  
Hazardous Waste Branch, Land Division  
P.O. Box 301463  
Montgomery, Alabama 36130-1463

Dear Mr. Cobb:

This letter transmits the annual report, required by the Land Use Control Assurance Plan (LUCAP), reflecting the status of land use controls (LUCs) established for properties on the former Fort McClellan. The LUCAP Appendix A, listing sites on the former Fort McClellan where LUCs constitute either a part of or the entire interim or final remedy, is updated and included at Enclosure 1. The LUCAP Appendix D, listing agency points of contact, is updated and included at Enclosure 2.

This letter affirms that LUCs for which the Army remains responsible for have been effective in protecting human health and safety. Daily security checks are performed. Warning signs are replaced when found to be damaged or missing.

The Calhoun County McClellan Development Authority (MDA) has responsibility for LUCs at many of the sites as shown on Appendix A. The MDA submitted to ADEM the Land Use Control Effectiveness Report (LUCER), dated March 2012, which addresses those sites. In a letter dated October 12, 2011, ADEM concurred with the Revised 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) (Enclosure 3). The Former Base Service Station was removed from Appendix A.

Copies of this correspondence with enclosures were provided to Mrs. Leigh Lattimore, EPA Region 4; Mr. Robin Scott, MDA; Mr. Roger Hall, Matrix Environmental Services; and Mrs. Sarah Clardy, U.S. Fish and Wildlife Service.

For additional information, please contact Ms. Lisa Holstein, [lisa.holstein@us.army.mil](mailto:lisa.holstein@us.army.mil), 256-848-7455.

Sincerely,

  
Scott J. Bolton  
Site Manager

Enclosures



LAND USE CONTROL ASSURANCE PLAN APPENDIX A  
FORT MCCLELLAN, ALABAMA  
March 2012

Site Name	EBS Parcel Lable	Site Location Reference	Reference for Source Document(s) or Decision Document	LUCIP Status	Site Owner	Implementing Agency	Remarks
Charlie Area, Mountain Longleaf National Wildlife Refuge	82Q-X, 88(6), 108(7), 112Q, 113Q-X, 187(7), 213Q, 214Q, 87Q-X, 111Q, 76Q- X, 84Q-X, 223Q, 77Q, 78Q, 80Q, 85Q, 109Q-X, 89Q-X, 215Q, 137Q-X, 82(7)	ECOP LUCIP Enclosures 1 thru 8 Figures	ECOP LUCIP January 2007	Interim	DOI	Army and DOI	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP was submitted in Sep03 as an attachment to the ECOP in Apr03. This area includes the Stump Dump, Parcel 82(7), and Training Area T-24A, Parcel 187(7), which were stand alone sites in Appendix A in 2001 and 2002. The ECOP LUCIP was revised in 2007 to allow public access in portions of Bains Gap Road. ADEM concurred with the Bains Gap Road MEC Removal Action Report in a letter dated 1Sep06.
Eastern Bypass OES2	N/A	Eastern Bypass OES2 LUCIP Figure	Action Memorandum August 2001	Final	ALDOT	ALDOT	The Action Memorandum for the Eastern Bypass was signed in Aug01 and the site was added to Appendix A in Dec01. The initial interim LUCIP was submitted in Mar04. The final LUCIP was submitted as Enclosure 13 of the FOST for the Eastern Bypass - Eastern Portion of Tract No. 3, October 2008, and is included in Appendix C.
GSA Warehouse Area	151(7), 2(7), 3(7), 4(7), 67(7), 69(7), 91(7), 111(7), 128(7), 129(7), 238(7)	FOST LUCIP Figures	Decision Document dtd - August 2003 Signed - October 8, 2003	Final	MDA	MDA	The site was added to Appendix A in Mar03 and the Decision Document was signed in Oct03. The Final LUCIP was submitted 29Mar04 and is included in Appendix C.
Alpha Area	184(7), 185(7), 126(7), 227(7), 230(7), 186(7), 88Q and 103Q, 89Q-X and 215Q, 100Q and 101Q, 132Q-X, 230Q-X and 149Q, Area North of MOUT	FOSET LUCIP Enclosure 1 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP was submitted in Sep03 as an attachment to the FOSET.
Former Small Weapons Repair Shop	66(7)	FOSET LUCIP Enclosure 2 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04.
Former Chemical Laundry/ Motor Pool Area 1500	94(7)	FOSET LUCIP Enclosure 2 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04.



LAND USE CONTROL ASSURANCE PLAN APPENDIX A  
FORT MCCLELLAN, ALABAMA  
March 2012

Site Name	EBS Parcel Lable	Site Location Reference	Reference for Source Document(s) or Decision Document	LUCIP Status	Site Owner	Implementing Agency	Remarks
Landfill # 1	78(6)	FOSET LUCIP Enclosure 3 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Landfill # 2	79(6)	FOSET LUCIP Enclosure 4 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Landfill # 3	80(6)	FOSET LUCIP Enclosure 5 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Landfill # 4	81(5)	FOSET LUCIP Enclosure 6 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Industrial Landfill	175(5)	FOSET LUCIP Enclosure 6 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Former Post Garbage Dump	126(7)	FOSET LUCIP Enclosure 7 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Fill Area East of Reilly Air Field	227(7)	FOSET LUCIP Enclosure 7 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Fill Area Northwest of Reilly Air Field	229(7)	FOSET LUCIP Enclosure 8 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Fill Area North of Landfill No. 2	230(7)	FOSET LUCIP Enclosure 9 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 21Mar02, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.



LAND USE CONTROL ASSURANCE PLAN APPENDIX A  
FORT MCCLELLAN, ALABAMA  
March 2012

Site Name	EBS Parcel Lable	Site Location Reference	Reference for Source Document(s) or Decision Document	LUCIP Status	Site Owner	Implementing Agency	Remarks
Bravo Area	180(7), 182(7), 511(7), 512(7), 513(7), 514(7), 516(7), 69Q, 70Q, 71Q, 75Q, 221Q, 222Q-X, 72Q-X, 150Q, 74Q, 79Q, 83Q, 84Q, 86Q, 118Q-X, 223Q, 224Q, 226Q, 227Q, 87Q-X, 110Q, 111Q, 239Q- X, 112Q, 213Q, 214Q, 114Q-X, 130Q-X, 73Q-X, 91Q-X, 115Q, 116Q-X, 117Q-X, 129Q-X, 151Q, 181(7), 200Q, 201Q, 228Q, 231Q, 232Q-X, Washington Tank Range, 1950 Rocket Launcher Range	FOSET LUCIP Enclosure 11 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP was submitted in Sep03 as an attachment to the FOSET.
Bravo Area - Dog Kennel Area	N/A	FOSET LUCIP Encl 11-1 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site is within the Bravo Area which was included in the initial Mar01 Appendix A. The initial interim LUCIP for the Bravo Area was submitted in Sep03 as an attachment to the FOSET. The FOSET LUCIP was revised in October 2004 by adding Enclosure 11-1 that allowed temporary occupancy of the Dog Kennel Area until July 1, 2005. Enclosure 11-1 was revised in March 2006 to allow occupancy to continue until August 30, 2007, at which time the lease would expire. The lease continues to be renewed and the MDA incorporated provisions into the lease prohibiting intrusive activity on the property.
Training Area T-38	186(6)	FOSET LUCIP Enclosure 12 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the initial Mar01 Appendix A. The initial interim LUCIP, submitted 18May01, was removed from Appendix B and replaced with the FOSET LUCIP in Sep03.
Training Area T-6	183(6)	FOSET LUCIP Enclosure 12 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04.
Cane Creek Training Area	510(7)	FOSET LUCIP Enclosure 12 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04.



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FORT MCCLELLAN, ALABAMA  
March 2012

Site Name	EBS Parcel Label	Site Location Reference	Reference for Source Document(s) or Decision Document	LUCIP Status	Site Owner	Implementing Agency	Remarks
Black Top Training Area	511(7)	FOSET LUCIP Enclosure 12 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04.
Fenced Yard in Black Top Area	512(7)	FOSET LUCIP Enclosure 12 Figure	FOSET LUCIP September 2003	Interim	MDA	MDA	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04.
Motor Pool Area 3100	24(7), 25(7), 73(7), 212(7), and 146(7)	Preparation of Final LUCIP by MDA is Underway	Decision Document dtd - July 2005 Signed - August 8, 2005	Preparation of Final LUCIP by MDA is Underway	MDA	MDA	The site was added to Appendix A in Apr07. ADEM required LUCs restricting groundwater usage in a letter dated 7Jul04. The Army notified the JPA in Mar05 that LUCs would be necessary for the site. The site was inadvertently omitted from Appendix A in Mar05 and Mar06. The site was leased to Auburn University in 2009. The lease includes a clause that restricts use of the property to surface use only.
Washrack Soldier's Chapel	127(7)	Preparation of Final LUCIP by MDA is Underway	Decision Document dtd - July 2005 Signed - August 8, 2005	Preparation of Final LUCIP by MDA is Underway	MDA	MDA	The site was added to Appendix A in Apr07. ADEM required LUCs restricting groundwater usage in a letter dated 10Jul05. The Army notified the JPA in Mar05 that LUCs would be necessary for the site. The site was inadvertently omitted from Appendix A in Mar05 and Mar06.
M1.01 Area and M3 Miscellaneous Property	N/A	Requires LUCIP	Final Letter Report November 2006	Requires LUCIP	MDA	MDA	The site was included in the initial Mar01 Appendix A. A clearance to 1-foot was performed in 2002 and the site was removed from Appendix A in Mar03. ADEM would not concur with the removal report until the Army agreed to provide construction support for the site. ADEM concurred with the removal report in a letter dated 19Jan07. The site was inadvertently omitted from Appendix A in Apr07, and was added back to Appendix A in Mar08.
Eastern Bypass "Y" Area Junction	N/A	Requires LUCIP	Final Report May 2007	Requires LUCIP	MDA	MDA	This site was previously addressed as part of the Bravo Area, and was added to Appendix A as a stand alone site in Mar08. ADEM concurred with the removal report requiring construction support in a letter dated 28Jun07.



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FORT MCCLELLAN, ALABAMA  
March 2012

Site Name	EBS Parcel Lable	Site Location Reference	Reference for Source Document(s) or Decision Document	LUCIP Status	Site Owner	Implementing Agency	Remarks
Iron Mountain Road Ranges (Range 12)	70Q	FOSET LUCIP Enclosure 11 Figure	ADEM Letter October 16, 2009	Interim	MDA	MDA	This site falls within the Bravo Area. The September 2003 Interim FOSET LUCIP remains in effect for this site. A maintenance and inspection plan for erosion control was required by ADEM as detailed in ADEM letter dated October 16, 2009. The MDA submitted a maintenance and inspection plan to ADEM on 23Mar10, As documented in the Land Use Control Effectiveness Report - 2010, dated March 2011.
Base Service Station	21(7) and 22(7)	EBS - X,Y Map Coordinates (17,30) (17,31)	Revised Amendment to the Final Groundwater Sampling Report, June 2006 ADEM Letter October 12, 2011	Removed	MDA	MDA	This site was added to Appendix A in Mar11. The site was removed from Appendix A in Mar12.
Probable Fill Area at Range 30	231(7)	EBS - X,Y Map Coordinates (25,47)	Decision Document dtd - October 2006 Signed - December 26, 2006	Removed	JPA	Army	The site was included in the initial Mar01 Appendix A, and the initial interim LUCIP was submitted 21Mar02. The site was removed from Appendix A and B in Mar04 and the NFA DD was signed 26Dec06. ADEM and EPA concurred with the SI report in letters dated 23Feb06 and 12Oct06 respectively.
Fill Area West of Range 19	233(7)	EBS - X,Y Map Coordinates (10,26)	Decision Document dtd - July 2005 Signed - July 26, 2005	Removed	JPA	Army	The site was included in the initial Mar01 Appendix A, and the initial interim LUCIP was submitted 21Mar02. The site was removed from Appendix A and B in Mar04 and the NFA DD was signed 26Jul05. ADEM and EPA concurred with the SI report in letters dated 6May05 and 27Sep04 respectively.



LAND USE CONTROL ASSURANCE PLAN APPENDIX A  
FORT MCCLELLAN, ALABAMA  
March 2012

Site Name	EBS Parcel Lable	Site Location Reference	Reference for Source Document(s) or Decision Document	LUCIP Status	Site Owner	Implementing Agency	Remarks
Former Weapons Demonstration Area, South Gate Toxic Gas Yard, Ranges West of Iron Mountain Road (Areas are located outside of Bravo Area)	194(7), 518(7), and Ranges West of Iron Mountain Road	FOSET LUCIP Enclosure 12 Figure	Decision Document dtd - August 2005 Signed - August 26, 2005	Removed	JPA	Army	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04. The site was removed in Mar06 after the NFA DD was signed on 26Aug05. ADEM concurred with the SI report in a letter dated 25May05. The Army submitted responses to EPA 7Oct03 comments in a letter dated 11Aug05.
Waste Chemical Storage Area	87(4)	Waste Chemical Storage Area LUCIP Figure	Removal Action Report November 2005	Removed	Army	Army	The Decision Document was signed in Dec01 and the site was included in Appendix A in Dec01. The initial LUCIP was submitted in Mar04. Arsenic contaminated soil was removed in 2005. EPA and ADEM concurred with the Removal Action Report in letters dated 25Nov05 and 10Mar06 respectively. The Final LUCIP was removed from Appendix A and C in Mar06.
Reilly Lake	N/A	FOSET LUCIP Enclosure 10 Figure	RCRA Facility Investigation May 2006	Removed	JPA	JPA	The site was included in the Sep03 FOSET LUCIP and added to Appendix A in Mar04. The RFI for the Fill Area East of Reilly, Parcel 227(7) and Former Post Garbage Dump, Parcel 126(7), determined that constituents in surface water and fish tissue did not pose an unacceptable risk. ADEM concurred with the RFI in a letter dated 28Jul06 and the site was removed from Appendix A in Apr07. MDA will amend Deed 13 to remove restrictions on Reilly Lake upon selling or conveyance of the property.



LAND USE CONTROL ASSURANCE PLAN APPENDIX A  
FORT MCCLELLAN, ALABAMA  
March 2012

Site Name	EBS Parcel Lable	Site Location Reference	Reference for Source Document(s) or Decision Document	LUCIP Status	Site Owner	Implementing Agency	Remarks
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Acronyms

ADEM - Alabama Department of Environmental Management

ALDOT - Alabama Department of Transportation

DD - Decision Document

DOI - Department of Interior

ECOP - Environmental Condition of Property

EPA - Environmental Protection Agency

EBS - Environmental Baseline Survey, Final, January 1998.

FOSET - Finding of Suitability for Early Tranfer

FOST - Finding of Suitability for Transfer

GSA - General Services Administration

JPA - Anniston-Calhoun County Fort McClellan Development Joint Powers Authority

LUC - Land Use Control

LUCER - Land Use Control Effectiveness Report

LUCIP - Land Use Control Implementation Plan

MDA - Calhoun County McClellan Development  
Authority

MEC - Munitions and Explosives of Concern

NFA - No Further Action

OES -Ordnance and Explosive Site

RCRA - Resource Conservation and Recovery Act

RFI - RCRA Facility Investigation

SI - Site Investigation



**APPENDIX D**  
**AGENCY POINTS OF CONTACT 2012**

**U.S. Department of the Army**

Mr. Scott J. Bolton  
U.S. Army Transition Force  
681 Castle Avenue, Building 200  
Fort McClellan, AL 36205  
Mailing address: PO Box 5022, Anniston, AL 36205  
Telephone: 256-848-3847  
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E-mail: [scott.j.bolton@us.army.mil](mailto:scott.j.bolton@us.army.mil)

**U.S. Environmental Protection Agency**

Mrs. Leigh Lattimore  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104  
Telephone: 404-562-8768  
FAX: 404-562-8518  
E-mail: [lattimore.leigh@epa.gov](mailto:lattimore.leigh@epa.gov)

**ADEM**

Mr. Stephen A. Cobb  
Alabama Department of Environmental Management  
Hazardous Waste Branch, Land Division  
1400 Coliseum Boulevard  
Montgomery, AL 36110-2059  
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**MDA**

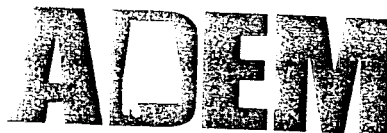
Mr. Robin Scott  
Calhoun County McClellan Development Authority  
4975 Bains Gap Road  
Anniston, AL 36205  
Mailing address: PO Box 5327, Anniston, AL 36205  
Telephone: 256-236-2011  
FAX: 256-236-2020  
E-mail: [robinscott@ccmda.org](mailto:robinscott@ccmda.org)

**U.S. Fish and Wildlife Service (not a co-signing agency for the LUCAP)**

Mrs. Sarah Clardy  
Mountain Longleaf National Wildlife Refuge  
664 Powers Avenue, Suite 200  
Anniston, AL 36205  
Telephone: 256-848-6833  
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E-mail: [Sarah\\_Clardy@fws.gov](mailto:Sarah_Clardy@fws.gov)

Enclosure 2





Alabama Department of Environmental Management  
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(334) 271-7700 ■ FAX (334) 271-7950

October 12, 2011

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

RE: **ADEM Review and Concurrence:** Revised 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), received via email October 6, 2011  
McClellan, Calhoun County, Alabama  
Facility I.D. No. ALA 210 020 562

Dear Mr. Scott:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the McClellan Development Authority's (MDA) Revised Amendment to the *Final Groundwater Sampling Report, June 2006* for the Former Base Service Station, Building 2109, Parcels 21(7) and 22(7), dated October 6, 2011. The Department notes that the purpose of the revision to the amendment was to address ADEM's comment letter dated September 30, 2011. The Department agrees with the revised Amendment and the requested changes to the Cleanup Agreement.

However, please note that the Department's final concurrence is contingent upon the completion of the actual modification of the Cleanup Agreement to reflect this change. Modifications to the Cleanup Agreement will be processed as determined by the Department in conjunction with the MDA.

If you have any questions concerning this matter, please contact Mrs. Ashley T. Mastin of the Remediation Engineering Section at 334-271-7797 or via email at [atmastin@adem.state.al.us](mailto:atmastin@adem.state.al.us).

Sincerely,

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

SAC/TPS/ATM/lac

Cc: Mr. Richard Satkin/Matrix  
Mr. Roger Hall/Matrix  
Ms. Lisa Holstein/Army

Ms. Brandi Little/ADEM  
Ms. Tracy P. Strickland/ADEM

Enclosure 3

Birmingham Branch  
200 Vulcan Road  
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Matrix  
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# Transmittal

<b>To:</b>	Mrs. Brandi Little	<b>VIA:</b>	Fed Ex
<hr/>			
	Governmental Hazardous Waste Branch Land Division		
<b>Address:</b>	Alabama Department of Environmental Management		
	P.O. Box 301463		
	Montgomery, Alabama 36130-1463		
<hr/>			
<b>Phone:</b>	(334) 274-4226		
<hr/>			
<b>Date:</b>	October 6, 2011		
<hr/>			
<b>From:</b>	Jennifer Keys		
<hr/>			
<b>Re:</b>	McClellan Former Base Service Station, Building 2109, Parcels 21(7) and 22(7)		
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☐ Urgent    ☒ For Review    ☐ Please Comment    ☐ Please Reply    ☐ As Requested

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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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[www.matrixdesigngroup.com](http://www.matrixdesigngroup.com)

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

Denver

Anniston

Atlanta

Colorado Springs



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.

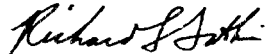
It is understood that this request may trigger a 45-day public comment period if ADEM considers this a major permit modification. In addition, a deed notification will also be provided to inform future property owners of the historical use as a military installation.

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)	UST-21-MW06		UST-21-MW10		UST-21-MW11		UST-21-MW15	
	Residential	6/14/2006	Residuum	6/14/2006	Residuum	6/14/2006	Residuum	6/14/2006
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)	UST-21-MW20		UST-21-MW22		UST-22-MW01	
	Residential	6/14/2006	Residuum	6/14/2006	Residuum	6/14/2006
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

RCTL = 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).