

**Response to Alabama Department of Environmental Management (ADEM) Comments on
Draft Report for the Charlie Area Remedial Investigation (dated June 2016)
Fort McClellan, Alabama**

Comments from Stephen A. Cobb, Chief, Governmental Hazardous Waste Branch, Land Division, provided in a letter dated January 5, 2017.

Comment 1: The document mixes the terms “no further investigation” and “no further action”. For example, 4.2.2.1 is titled “Areas Recommended for No Further Action” which is then followed by Section 4.2.2.1.1 which lists six areas that are recommended for “no further investigation” with no further discussion of the areas being recommended for “no further action”. These terms are not interchangeable. “No further investigation” indicates that an area has been sufficiently characterized while “no further action” indicates that nothing needs to be done to address contamination. Please ensure that these terms are used appropriately and consistently throughout the document.

Response 1: The title of Section 4.2.2.1 was revised to correct the inconsistency in the terms “no further investigation” and “no further action.” The only other similar inconsistency in the RI Report that required correction was in Step 5 of the DQO for “Quantifying the MEC Density in the Residual Non-Target/Impact Area.”

Comment 2: Section 2.4.6.3 states that for the six areas recommended for no further investigation, “the EE/CA (engineering evaluation/cost analysis) fieldwork results provide sufficient investigation coverage and appropriate thoroughness of investigation to qualitatively determine that the MEC (munitions and explosives of concern) hazards in these areas are minimal.” Table 4-1 quantifies the MEC density at 95% confidence as .6 or fewer MEC/acre for the Choccolocco Corridor Parcels. Section 7.3.1.3 then states that a MEC Hazard Analysis (HA) is not appropriate for MRS-03, which is largely comprised of these areas, based on the lack of a MEC source. While the Department agrees that the area does not require any further investigation for characterization, the result of the RI document indicate a minor, but existing, MEC hazard. Therefore, please update the Conceptual Site Model in Figure 5-12 to show a potentially complete exposure pathway in MRS-03 and complete a MEC HA for this MRS.

Response 2: The RI Report has been revised to address the MEC hazard in MRS-03. This includes revision of the CSM for MRS-03, preparation of a MEC HA for MRS-03, as well as recommending that MRS-03 proceed to the Feasibility Study. See Supplemental Response 2 for further revisions incorporated into the RI Report for this MRS.

Supplemental Responses:

1. The MRS boundaries have been revised in the Draft Final RI Report to better correspond to their anticipated long-term management requirements. These revisions are primarily administrative in nature and consist of the following changes:

- a. MRS-01: The boundaries of the 11 MRS sub-areas have been expanded to encompass all adjacent areas that were subject to Removal Actions that have been previously conducted and approved by ADEM (refer to Section 2.4.5 of the RI Report for a list of these Removal Actions). Whereas the Draft RI Report characterized MRS-01 based on the conditions encountered during the RI fieldwork, the Draft Final RI Report characterizes MRS-01 based on both the current and historical conditions within this MRS. As a result of this revision, MRS-01 now contains 12 sub-areas.
- b. MRS-02: By shifting the previous Removal Action acreage from MRS-02 to MRS-01, the reduction in the MRS-02 footprint had a minor effect on the previous RI results for MRS-02. However, the recalculated MEC density for MRS-02 only resulted in an increase from 0.5930 MEC per acre to 0.5946 MEC per acre at 99% confidence. This MEC density still meets the RI DQO for “Quantifying the MEC Density in the Residual Target/Impact Areas.” Therefore, this MRS boundary revision does not present a significant change in the RI results for MRS-02.

The MRS-02 boundary was also modified to encompass the U.S. Fish and Wildlife Service property not included in MRS-01. Because this change is administrative in nature, we have not revised the methodology presented in Section 5.1.6.5 that was used to quantify the residual MEC density. Therefore, we have conservatively assumed that the recalculated MEC density, 0.5946 MEC per acre at 99% confidence, will apply over this additional portion of MRS-02.

- c. MRS-03: The size of MRS-03 was reduced to include only the Alabama Forestry Commission’s property. This did not change the calculated MEC density for the five Choccolocco Corridor parcels, except for CC-1L-FM, which is described below.
2. While the Draft RI Report was under ADEM review, two MEC items were encountered in MRS-03, specifically in Parcel CC-1L-FM. Instead of conducting additional RI activities, the Army conducted an Interim Removal Action in the vicinity of these MEC items. After discovering this new site information, we reviewed the potential for these results to present a data gap in the RI and have concluded that they do not. The results of the Interim Removal Action indicate that this area did not meet the DQO Step 7 requirements for consideration as a “Target/Impact Area” since the resulting munitions-related anomaly density was only 24.3 anomalies per acre as opposed to the 100 anomalies per acre criterion used to delineate the

target/impact areas in the RI. The MEC density was recalculated for Parcel CC-1L-FM. This resulted in an increase in MEC density from 0.05486 MEC per acre to 0.1186 MEC per acre at 95% confidence, which still meets the RI DQO for “Quantifying the MEC Density in the Residual Non-Target/Impact Areas.” Therefore, the results of the Interim Removal Action correspond with the revisions to the MRS’s CSM that have been made to address ADEM’s Comment 2 above. Documentation of the Interim Removal Action, along with Army verification that the data is of sufficient quantity and quality for use in the RI statistical calculations, are referenced in the Draft Final RI Report.

3. During preparation of the Final RI Report, the U.S. Fish and Wildlife Service (FWS) determined that the land use activities previously planned for the Sensitive Forest Management Areas will not sufficiently protect the threatened and endangered species present in those areas. Instead, the FWS will be required to periodically perform close proximity controlled burn and intrusive activities to conduct vegetation management activities at the site. This new information has been incorporated into the revised Conceptual Site Model (Section 5.3).