

**Responses to Alabama Department of Environmental Management Review Comment
Focused Feasibility Study
Former 81mm Mortar Range, Parcel 137Q-X
Fort McClellan, Calhoun County, Alabama
September 2011**

Review Comments from Stephen A. Cobb Chief, Governmental Hazardous Waste Branch, Land Division, letter dated December 2, 2011.

General Comments

Comment 1: Stabilized lead-contaminated soil that is to be disposed off-site, as in Alternatives 3a, 3b, and 4, would be considered a “RCRA special waste” throughout the report. Please clarify this description and how it applies to the waste soil.

Response 1: The statement “RCRA special waste” was revised to “nonhazardous special waste” The following text was also added where the term “special waste” is first introduced in Section 4.1.3: “Special waste is defined by ADEM 335-13-1 as those wastes requiring specific processing, handling or disposal techniques as determined necessary by the Department which are different from the techniques normally utilized for handling or disposal. Many disposal facilities require special waste approval of lead-contaminated soil prior to acceptance for disposal.”

Comment 2: Please indicate in the report that alternative treatment standards will be used during the remediation of the lead-contaminated soil at the site in accordance with ADEM Admin. Code r. 335-14-9-.04(9).

Response 2: Page 3 of Table 2-2 currently cites ADEM 335-14-9 as applicable for waste disposal. No changes to the document are necessary.

Specific Comments

Comment 1: Section 3.2, Page 3-1, Paragraph 3. The first sentence is misleading when describing lead concentration of 4,390 mg/kg in a subsurface soil sample as “slightly” above the residential site-specific screening level of 400 mg/kg. Please address.

Response 1: The word “slightly” was deleted from the text.

Comment 2: Section 3.2, Page 3-1, Paragraph 3. Please insert a comma after “location” in Line 35.

Response 2: Text was revised as suggested.

Comment 3: Section 3.2, Page 3-1, Paragraph 3. Please omit “to a depth” where it is repeated on Line 38.

Response 3: Text was revised as suggested.

Comment 4: **Section 4.1.6, Page 4-23, Paragraph 1.** The Department notes that **Alternative 5 – Excavation of Soil, Land-Use Controls, On-Site Soil Washing, Phytoremediation, and Off-Site Disposal** is not the recommended remediation alternative in this FFS. However, in **Alternative 5**, after the lead-contaminated soil has been washed, the 1/4 –inch-minus material would be replaced back onto the range to be further remediated via phytoremediation. **If this alternative was the recommended remediation method, there would be several issues that would need to be addressed such as biomass management, land disposal restriction standards, and land use controls. Please address.**

Response 4: The following sentence was added to the 2nd paragraph of Section 4.1.6: “Plant biomass must be harvested and removed, followed by metal reclamation or proper disposal of the biomass with consideration to disposal requirements including land disposal restriction standards.” Land-Use Controls are briefly discussed in the 3rd paragraph of Section 4.1.6. Additional details for the design and implementation of a remedial alternative would be included in a remedial action work plan.

Comment 5: **Section 5.1, Page 5-1.** Please include some discussion regarding the protection of ecological receptors.

Response 5: The phrase “human health or the environment” was changed to “human health or ecological receptors (i.e., flora, fauna)” in the first paragraph of Section 5.1 to clarify that the remedial alternative’s protectiveness also applies to ecological receptors.