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September 26, 2007

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

Mr. Tom Lederle
Director Base Realignment and Closure
2530 Crystal Dr. Rm 5000
Taylor Bldg/NC3
Arlington, VA 22202

Re: Response to Comments on *Revision 1 to Final Program-Level Work Plan
Munitions and Explosives of Concern Remediation Alpha and Bravo Munitions
Response Areas of McClellan*; dated August 2007
McClellan, Anniston, Alabama
Cleanup Agreement No. AL4 210 020 562

Dear Mr. Cobb and Mr. Lederle:

Attached are our responses to ADEM's comments on *Revision 1 to Final Program-Level Work Plan Munitions and Explosives of Concern Remediation Alpha and Bravo Munitions Response Areas of McClellan* and the revised document. No comments were received from the Army.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC.

Richard L. Satkin, P.G.
Senior Project Manager

cc: Ms. Miki Schneider/JPA
Ms. Julie Ange/ADEM
Ms. Lisa Holstein/Army TF
Mr. Jim Pastorick/UXOPro

ADEM COMMENTS

1. Page 2-12, Section 2.5.8.1: The last two paragraphs of this section describe the certification of munitions and explosives of concern (MEC) scrap for disposal off-site. The description of the process used is complex and it is not possible to determine if it meets the requirement for 100% inspection and 100% reinspection of all MPPEH as required by Department of Defense Instruction 4140.62, *Management and Disposition of Material Potentially Presenting an Explosive Hazard (MPPEH)* (December 2004). Please clarify the method to be used to perform and document the 100% inspection and 100% reinspection of all MPPEH.

Response: Concur. We revised the text to clarify the methodology for performing 100% inspection and 100% re-inspection.

2. Page 2-16, Section 2.7: The final paragraph of this section says that no additional work plans will be developed for providing construction support. This policy is not in accordance with the requirements of EP 75-1-2, which requires that the construction support project be evaluated and that site-specific considerations be included in a construction support work plan. While the construction support work plan may be a brief document, it is required as a record of the evaluation of the probability of encountering MEC and the specific support that will be provided (ranging from on-call standby to construction footprint MEC clearance). Please address.

Response: Concur. We revised the text to indicate that a construction support work plan will be completed and submitted to cover future construction support activities.

3. Page 4-3, Section 4.4.1: This section prohibits entry of authorized visitors into the exclusion zone (EZ). This policy is contrary to the guidance in EP 385-1-95a, which specifically allows authorized visitors to enter the EZ. It is essential that ADEM retain the ability to enter the EZ, under the guidelines and restrictions of EP 385-1-95a, in order to perform regulatory oversight. Please revise this section to allow authorized visitors to enter the EZ.

Response: Concur. We revised the text to state that authorized visitors will be allowed inside the EZ.

4. Page 4-3, Section 4.4.2: This section states that, "Only UXO-qualified personnel will perform excavation and investigation of anomalies." This statement contradicts the staffing plan that "the intrusive teams will consist of seven EOD-qualified persons and include at least one UXO Tech III (team leader) and one UXO Tech II" proposed in Section 2.5.6 (Page 2-9). Section 2.5.6 indicates that the intrusive teams will likely have five members qualified only as UXO Tech I's. However, Department of Defense Explosive Safety Board (DDESB) Technical Paper 18 defines "UXO-Qualified Personnel" as UXO Tech II and above. By this definition, up to five members of each team, as UXO Tech I's, would not be able to perform intrusive investigations. Please address.

Response: Concur. We revised the text to be compliant with DDESB terminology.

5. Page 10-8, Table 10-1: The clearance depth shown for a 2.36-in rocket is deeper than that shown for a 3.5-in rocket. While the actual recovery depths thus far for 3.5-in. rockets have been significantly less than for 2.36-in. rockets as shown in Table 10-2, it doesn't make technical sense to have a lesser detection requirement for the larger 3.5-in. rocket and it is possible that they may be found at deeper depths. Please revise the detection requirement for 3.5-in. rockets to be the same depth as the 2.36-in rocket at 24-in.

Response: Concur. We revised the depths from 18 inches to 24 inches for a 3.5-inch Rocket in Tables 10-1 and 10-2.

6. Page 10-14, Section 10.7.3.4: The activity QC inspection points described in this section as QC Step 4 are actually the standards to be used for the follow-up inspections described as QC Step 2. Since the blind seeding program is not specifically incorporated into the Six Step Process, the Department recommends that the inspection points described in QC Step 4 be integrated with QC Step 2 and that a new QC Step 4 that formally incorporates the blind seeding program into the UoP (unit of production) certification process be added. Please address.

Response: Concur. We integrated the prior QC Step 4 with QC Step 2 and added the blind seed program as the new QC Step 4 as suggested.

7. Page 10-15, Table 10-3:
 - a. Please remove the column labeled "level of importance". There are only two items that are not designated as critical and there appears to be no difference between the critical and major definable features of work (DFW) with regard to the QC actions to be taken.
 - b. Please insert additional information in the spaces marked "N/A". This table should only describe important checks that must be made as part of the QC program. If there is no "attribute", "sampling frequency" or "red flag criteria" then there really is no inspection to be performed.
 - c. The "QC Action" for blind seeding for "UXO Surface and Near Surface Clearance" is "Minimum of one per UoP". However, Section 10.7.4.3 requires "a minimum of one per acre." Please correct Table 10-3 to require a minimum of one blind seed per acre.
 - d. The sampling frequency indicated for instrument checks for "Intrusive Investigation" is daily, but the sampling frequency for "Daily Instrument Static, Latency check" is weekly. Please revise the table so that the "daily" digital geophysical mapping (DGM) checks are done and confirmed by the geophysical quality control specialist (GeoQCS) on a daily frequency instead of weekly.

Response: Concur on all points. a) We removed the column. b) We removed all spaces marked as 'N/A' and added appropriate red-flag criteria. c) We clarified that a minimum of one blind seed per UoP will be installed. d) We changed the sampling frequency to daily (it is not our intent, however, to limit the QC seeding to the minimum frequency).