

RESPONSES TO COMMENTS

Document: Prescribed Burn 2006, MRS-16, After Action Report, Former Fort Ord, Monterey County, California

Comments from MBUAPCD

"Figure 6 – Satellite Images, Caption (p. 31)

The text of the note should be clarified to indicate that the smaller smoke plume, which affected some of the monitoring sites, was from an agricultural burn northeast of Salinas."

Response:

Corrected as recommended.

Comments from MBUAPCD

"Conclusion (p. 32, paragraph 3, last sentence)

The District received no complaint calls where smoke impacts reports could be verified as being the result of the MRS-16 prescribed burn."

POMFD Response

Corrected as recommended.

Comments from Fort Ord Environmental Justice Network

"The report notes that the burn caused a small spot fire outside the designated boundaries of the burn. While the fire was small and quickly put out, it is not clear what sort of strain the spot fire would have put on efforts to contain other escapes. These spot fires are particularly dangerous not only because they occur outside established fire breaks but because they have the potential to cause other spot fires in locations much more difficult to combat. The report should examine how prepared the contractors would have been for such a scenario, as one of the major flaws noted with the after action report of the last burn was a lack of a failure analysis. The purpose of these reports is to provide an in-depth analysis of all events and what lessons can be learned from those events. By skimming over this, the Army is abdicating one of its primary responsibilities in the compilation of this report."

Response:

Clarification: The letter from Fort Ord Environmental Justice Network refers to the burn operations being conducted by "contractors". The MRS-16 prescribed burn was not conducted by a contractor but rather by the Presidio of Monterey Fire Department. The POMFD is the Federal fire department located on Fort Ord.

The spot fire caused no "strain" on any "efforts to contain other escapes". Initially one (1) Presidio of Monterey Fire Department (POMFD) engine was used to contain the spot fire however a second POMFD engine was brought in to expedite the spot fire mop-up so that firing operations could resume.

Two (2) suppression helicopters were utilized for water drops around the spot fire area to assist in containment and prevent any additional spot fires. Two (2) more helicopters remained in reserve for fire operations use. During the burn preparation, secondary control lines were pre-established in every direction in the event that a spot-fire spread. Upon the report of a spot-fire, the Incident Commander and Burn Boss immediately moved to the secondary control lines to ensure that the spot-fire had not moved beyond the fire engines initial attack.

Our contingency resources of three (3) engines from California Department of Forestry and Fire Protection (CDF) were held on a stand-by status next to the burn unit to use for back up resources, if necessary. Although their assistance was not utilized, they could have been activated at any time.

Also, two (2) additional engines that were on-site were still on patrol, monitoring the fire operations and surrounding area to watch for any potential spot-fires.

Due to the extensive contingency planning and quick action by fire personnel not only was the spot-fire kept small and extinguished rapidly but the spot-fire was never a strain on the fire resources, nor caused any threat of additional spot-fires.

RESPONSES TO COMMENTS

Document: Prescribed Burn Air Monitoring Report, Munitions Response Site 16, Former Fort Ord, Monterey County, California

Comments from Monterey Bay Unified Air Pollution Control District

Section 2.0 Results - The data collected by the District, which are in agreement with and support these results, should be included as part of this Report. These data were transmitted to the Army's contractor earlier this year.

Response:

The Army will work with the District to facilitate the incorporation of their data into the monitoring report, possibly as an additional Appendix containing the District's data in their report format.

Comments from Monterey Bay Unified Air Pollution Control District

Section 5.0 Conclusions (p.5-1, paragraph 2, last sentence) - The impact of agricultural burns being conducted in the Salinas Valley during the same time period as the prescribed burn at MRS-16 should be mentioned. District data support this conclusion. In addition, reference should be made to Figure 6 in the "Draft Prescribed Burn After Action Report, Former Fort Ord, Monterey County, California".

Response:

Text has been added to Section 5.0 to emphasize those points as described.

General comments from Fort Ord Environmental Justice Network

Please see attached hard copy, enclosed report submitted by Fort Ord Environmental Justice Network, Inc. for inclusion in the Administrative Records.

Comments from Fort Ord Environmental Justice Network

FOEJN is concerned that particulate matter from the smoke, including the chemical (Alumael), Red Oak, lead contaminated soil, and Military Munitions are not being counted as health threats. Everyone is impacted, especially those who are experiencing respiratory problems, Asthmas, and other ailments for years of exposure. The elderly can experience Strokes and Heart attacks. Children are experiencing increased Asthma levels. FOEJN is concerned that the Bureau of Land Management (another Federal Agency is also burning, and we are told that other groups are burning, as well. We seem to have free will burning, no matter who is exposed or impacted in our vastly populated areas of Fort Ord and it's surrounding cities. Please, stop the burning, cheaper is not better.

Response:

The Army recognizes that there are many environmental issues present at the former Fort Ord, such as the presence of lead contaminated soil and munitions and explosives of concern (MEC) in certain parts of the former base. That is why the cleanup of the former Fort Ord is being conducted under the CERCLA (Superfund) program. Remedial investigation/feasibility studies (RI/FSSs) study the nature and extent of such contamination and cleanup alternatives that would address the risks to human health and the environment. Poison Oak is a native plant that exists naturally in this region of California.

A study of alternative vegetation removal techniques confirmed that prescribed burning best addresses habitat preservation requirements and worker safety without significant risk to the health of local residents. Data collected during recent prescribed burns on the former Fort Ord indicates that the

smoke generated by these events is not a threat to healthy local residents nor those with respiratory or other illness provided that they take reasonable precautions when smoke is in the air. Future prescribed burning conducted by the Army in preparation for MEC removal will be designed to minimize the impact to local communities.

Prescribed burning is widely used in California as a resource management tool. California regulations direct local air districts to implement smoke management programs with the goal of minimizing any significant impacts that agricultural or prescribed burning may have on air quality or public health. Elements of the smoke management program include registering and permitting of agricultural and prescribed burns, meteorological and smoke management forecasting, and daily burn authorization by the local air district. The Army conducts its prescribed burning in compliance with substantive regulatory standards and coordinates its prescribed burning activities with the Monterey Bay Unified Air Pollution Control District.

Comments from Environmental Stewardship Concepts on Behalf of The Fort Ord Environmental Justice Network, March 31, 2007

- ESC and FOEJN continue their opposition to future prescribed burns at Fort Ord
- The Army should adopt a cumulative risk approach when evaluating prescribed burns
- PM_{2.5} should be monitored during future burns
- The report should examine the ability of the contractors to handle more than one spot fire at a time.

Comments from Environmental Stewardship Concepts on Behalf of The Fort Ord Environmental Justice Network, March 31, 2007

This after action report continues to demonstrate many of the very real concerns citizens have expressed about the prescribed burn program at Fort Ord. The most notable of these concerns being the effect of the burn on the respiratory health of nearby residents. Elevated values of PM₁₀ were recorded all around the burn, and exceeded the California 24-hour standard at one location. ESC agrees with the Army's conclusion that a nearby burn unrelated to Fort Ord influenced the values at that station, but unlike the Army we do not believe that this makes the exceedance irrelevant. Fort Ord does not exist in a vacuum and the Army has a responsibility to take outside factors into account in its efforts to protect public safety. At the very least this violation should have led to a recommendation not to conduct burns at Fort Ord at the same time that burns are being conducted nearby.

Response:

The intent of the statement that the single PM₁₀ exceedance at the Spreckels School was not representative of particulate impacts from the MRS-16 prescribed burn was meant to clarify the nature of the PM₁₀ level seen relative to conditions/other sources near or adjacent to the sampling location. None of the other samples collected during the MRS-16 monitoring program exceeded the established PM₁₀ screening level; therefore, the Army does not consider those levels as "elevated". The Army conducts its prescribed burning in compliance with substantive regulatory standards and coordinates its prescribed burning activities with the Air District. The Army is committed to continue working with the Air District and other regulatory agencies in identifying appropriate procedures, conditions and timing, including outside factors such as other burns, when planning for future prescribed burns.

Comments from Environmental Stewardship Concepts on Behalf of The Fort Ord Environmental Justice Network, March 31, 2007

This is representative of a trend where the Army uses known, existing sources of pollution to mask or dismiss its own. One example of this is the often cited ATSDR report that asserted that elevated acrolien should not be a concern during prescribed burns because of the ambient levels that are already present in major cities as a result of car emissions etc. The problem with dismissing concentrations that exceed regulatory standards for this reason is that it places the Army in a position

where it is knowingly creating a situation that leads to an increase in already dangerous levels of compounds. In other words they are knowingly putting local residents at risk through their actions.

Response:

The Army acknowledges that prescribed burning produces particulates and other vegetation combustion-related contaminants for a short period. The data collected during recent prescribed burns on the former Fort Ord indicates that the smoke generated by these events is not a threat to healthy local residents nor those with respiratory or other illness provided that they take reasonable precautions when smoke is in the air. For contaminants such as particulate matter, many sources exist in the environment, so the air monitoring program must take that into account when evaluating the effects from the Army's burn. The data collected during the MRS-16 prescribed burn, including data from the Spreckels station are available to the Air District, who regulates agricultural and prescribed burns in the region.

Comments from Environmental Stewardship Concepts on Behalf of The Fort Ord Environmental Justice Network, March 31, 2007

This is precisely why the EPA has developed a framework for cumulative risk assessment. The Army and the EPA should be working diligently to insure that their actions at Fort Ord do not compound risks local residents already face. A failure to do so represents a complete disregard for the very people these organization are tasked with protecting.

Response:

The appropriate air screening level for the air monitoring program was identified through the cooperative efforts of the Army, U.S. Environmental Protection Agency (USEPA), California Environmental Protection Agency Department of Toxic Substances Controls (DTSC), California Air Resources Board (CARB), and Monterey Bay Bay Unified Air Pollution Control District (MBUAPCD). Except for the sample collected at the Spreckels School, all sample results were below that screening level. In regards to cumulative risk assessment, case studies and issue papers are in progress, the information from which would help toward eventual development of cumulative risk assessment guidance by EPA. At this time, the framework is neither a procedural guide nor a regulatory requirement within EPA. The Army will continue to follow existing EPA guidance for implementing environmental investigations at the former Fort Ord.

Comments from Environmental Stewardship Concepts on Behalf of The Fort Ord Environmental Justice Network, March 31, 2007

ESC also maintains that the Army should be monitoring for PM_{2.5} during these burns. These smaller particles of particulate matter represent a much graver threat to public health because of the ease that they are inhaled into the lungs and trapped there (REFERENCE). PM_{2.5} has been strongly linked to increases in heart attacks, strokes, and respiratory illness; much more so than PM₁₀ (REFERENCE). As a result, the regulatory standards for PM_{2.5} are significantly lower than those for PM₁₀. PM_{2.5} is often associated with PM₁₀ (REFERENCE?), and open burns such as those being conducted at Fort Ord should not be expected to be any different. Virtually every regulatory agency involved in the process has requested that the Army do so, and yet the Army continues to defy both regulatory agencies and the people in a way that puts public health at risk.

Response:

The monitoring plan for the MRS-16 prescribed burn which identified sampling for PM₁₀ to assess smoke impacts was reviewed and accepted by the regulatory agencies, including the MBUAPCD (Air District). The monitoring program was designed to allow comparison to the results of the previous program in 2003, and to be consistent with the Air District's monitoring program for 2006. The scope of air monitoring program for future prescribed burns conducted by the Army in preparation for MEC removal at Fort Ord will be site-specific and in a manner consistent with substantive regulatory requirements for air monitoring for similar burns. Future air monitoring plans would be developed by the

Army in cooperation with USEPA, DTSC, CARB, and MBUAPCD, and will be available for public review.

RESPONSES TO COMMENTS

Document: After Action Report, Notification and Voluntary Relocation Plan

Comments from Fort Ord Environmental Justice Network

FOEJN is concerned that particulate matter from the smoke, including the chemical (Alumael), Red Oak, lead contaminated soil, and Military Munitions are not being counted as health threats. Everyone is impacted, especially those who are experiencing respiratory problems, Asthmas, and other ailments for years of exposure. The elderly can experience Strokes and Heart attacks. Children are experiencing increased Asthma levels. FOEJN is concerned that the Bureau of land management (another Federal Agency is also burning, and we are told that other groups are burning, as well. We seem to have free will burning, no matter who is exposed or impacted in our vastly populated areas of Fort Ord and it's surrounding cities. Please, stop the burning, cheaper is not better.

Response

The Army recognizes that there are many environmental issues present at the former Fort Ord, such as the presence of lead contaminated soil and munitions and explosives of concern (MEC) in certain parts of the former base. That is why the cleanup of the former Fort Ord is being conducted under the Superfund program. Remedial investigation/feasibility studies (RI/FSs) study the nature and extent of such contamination and cleanup alternatives that would address the risks to human health and the environment. Poison Oak is a native plant that exists naturally at the former Fort Ord.

A study of alternative vegetation removal techniques confirmed that prescribed burning best addresses habitat preservation requirements and worker safety without significant risk to the health of local residents. Data collected during recent prescribed burns on the former Fort Ord indicates that the smoke generated by these events is not a threat to healthy local residents nor those with respiratory or other illness provided that they take reasonable precautions when smoke is in the air. Future prescribed burning conducted by the Army in preparation for MEC removal will be designed to minimize the impact to local communities.

Prescribed burning is widely used in California as a resource management tool. California regulations direct local air districts to implement smoke management programs with the goal of minimizing any significant impacts that agricultural or prescribed burning may have on air quality or public health. Elements of the smoke management program include registering and permitting of agricultural and prescribed burns, meteorological and smoke management forecasting, and daily burn authorization by the local air district. The Army conducts its prescribed burning on compliance with substantive regulatory standards and coordinates its prescribed burning activities with the Monterey Bay Unified Air Pollution Control District.