FINDING OF SUITABILITY TO TRANSFER (FOST)
PENINSULA OUTREACH WELCOME HOUSE PARCEL
BUILDINGS T-2814 THROUGH T-2817 AND T-2836
FORMER FORT ORD, CALIFORNIA

On the authority delegated to me by the Acting Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health, (20 Jul 95), and on the basis of an Environmental Baseline Survey (EBS) for the McKinney Homeless Act Group A Parcels, I have determined that the Peninsula Outreach Welcome House (POWH) Parcel, Buildings T-2814 through T-2817 and T-2836, at former Fort Ord, California (Property), is suitable for transfer to POWH for transitional and emergency housing. The area to be assigned and transferred includes five buildings on approximately ¾ acre (Plate 1).

A determination of the environmental condition of the Property was made by the United States Army by conducting an EBS that included reviewing existing environmental documents and making associated visual site inspections. The documents reviewed included the final Fort Ord Community Environmental Response Facilitation Act (CERFA) Report, April 1994, U.S. EPA Region IX's concurrence to the CERFA Report (Memorandum, 19 April 1994), and various remedial investigation/feasibility studies documents. Comments received from U.S. EPA Region IX (10 July 1995) and California EPA DTSC (11 July 1995) on the 31 May 1995 Version 1 EBS/FOST/FOSL for the McKinney Group A Parcels have been reviewed and incorporated where possible. A single unresolved comment on Asbestos Indemnification Language is attached. The results of the EBS indicated that the Property is environmentally suitable for transfer to POWH.

The results of the EBS are as follows:

- Five buildings (T-2814 through T-2817 and T-2836) are located on the Property. The buildings were previously used for guest or temporary housing at Fort Ord.

- An asbestos survey conducted by the Army shows that Buildings T-2814 through T-2817 and T-2836 contain nonfriable asbestos and that Building T-2817 contains friable asbestos in undamaged condition. The asbestos in these buildings does not present an immediate health hazard.

- The five buildings are suspected to contain LBP because they were constructed prior to 1978.

- No elevated radon levels were detected on the Property during a 1990 survey at Fort Ord.

- No radiological surveys have been conducted within the Property because these buildings were not used to store radiological materials.

- There have been no reported releases of PCB-contaminated dielectric fluids from any transformer present on the Property.

- Ordnance and Explosives (OE) surveys show that no potential OE locations are within or immediately adjacent to the Property.

- No underground or aboveground storage tanks or solid waste management units are present on the property, and no studies associated with them have been conducted by the Army for the Property.

- The final CERFA report identifies the Property as a CERFA disqualified parcel because of its inclusion within Installation Restoration Site 28. However, no part of the Property was included in the site characterization activities at Site 28. Furthermore, Site 28, which was investigated under the Fort Ord RI/FS program, was categorized as a No Action site .

- No groundwater monitoring wells are present on the Property.

On the basis of the above results from the EBS and subsequent investigations, certain terms, conditions, reservations, restrictions, and notifications are required. Use restrictions and disclosure of conditions are described below and will be included in the transfer documents.

NOTICE OF THE PRESENCE OF ASBESTOS. The Property existing on the date of this conveyance may contain certain amounts of asbestos in the floor tile, linoleum and associated mastic, asbestos-containing pipe and tank insulation, heating, ventilating, and air condition vibration joint cloths, exhaust flues, acoustic ceiling treatment, siding, drywall, drywall compound, debris in some of the buildings, or incidental amounts in the window putty or gasketing, etc.

The GRANTEE covenants and agrees, on behalf of it, its successors and assigns, that in its use and occupancy of the Property, it will comply with all applicable laws relating to asbestos, and that the GRANTOR assumes no liability for damages for personal injury, illness, disability or death, to the GRANTEE, its successors or assigns, or to any other person including members of the general public, arising from or incident to the purchase, transportation, removal, handling, alterations, renovations, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos on the Property described in this Deed, regardless of whether the GRANTEE, its successors or assigns have properly warned or failed properly to warn the individual(s) injured.

NOTICE OF THE PRESENCE OF LEAD-BASED PAINT. The GRANTEE is hereby informed and does acknowledge that any Property existing on the date of this Deed which was constructed or rehabilitated prior to 1978 is presumed to contain lead-based paint.

The GRANTEE, its successors and assigns, shall not permit the use of any such structure for residential habitation unless the GRANTEE has eliminated the hazards of lead-based paint by treating any defective lead-based paint surface in accordance with all applicable laws and regulations. Residential structures are defined as any house, apartment, or structure intended for human habitation, including but not limited to a non-dwelling facility commonly used by children under 7 years of age such as a child care center, elementary school, or playground.

National Environmental Policy Act (NEPA) requirements are satisfied by the analysis contained in the June 1993 Fort Ord Disposal and Reuse Final Environmental Impact Statement (FEIS), and December 1993 Record of Decision (ROD) .

On the basis of the above, I conclude that the POWH Parcel, Buildings T-2814 through T-2817 and T-2836, should be assigned Department of Defense (DoD) Environmental Condition Category 3 (because of its inclusion in IRP Site 28) and is transferable under Section (§) 120(h)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The deed for this transaction will contain:

- The covenant under CERCLA §120(h)(3)(B)(i) warranting that all remedial action necessary to protect human health and the environment with respect to hazardous substances remaining on the Property has been taken

- The covenant under CERCLA §120(h)(3)(B)(ii) any remedial action found to be necessary after the date of transfer shall be conducted by the United States

- The clause under CERCLA §120(h)(3)(C) granting the United States access to the Property in any case in which remedial action or corrective action is found to be necessary after the date of transfer.

29 APR 1996

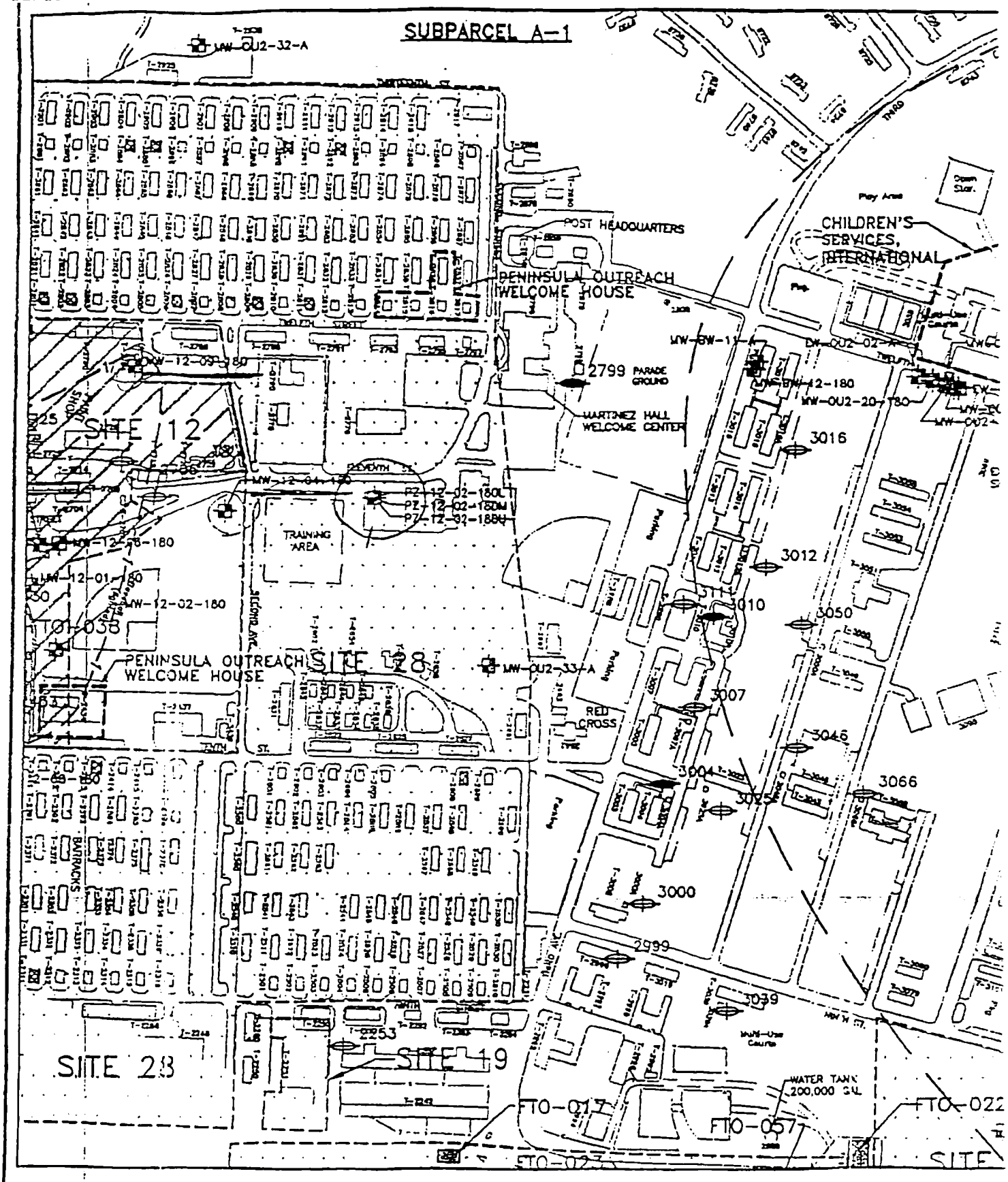
Toni B. Wainwright
Assistant Deputy Chief of Staff
for Base Operations Support
United States Army Training and Doctrine Command

UNRESOLVED AGENCY COMMENT
MCKINNEY GROUP A EBS/FOST/FOSL

U.S. EPA 10 July 1995 Comment

Comment 3: **Page 3, 3rd paragraph - Public law 102-484, as amended by Public Law 103-160, provides for indemnification by the military services when property is transferred or leased. This law provides that the military indemnify persons and entities acquiring ownership or control of property at a closing military base from liability for personal injury and property damages resulting from the release or threatened release of a hazardous substance (such as asbestos), unless the person or entity acquiring the property contributed to the release. The Army's statement in the FOST may conflict with the required indemnification. We recommend that the Army delete this paragraph and rely on the statutory language to determine any future liability as a result of exposure to asbestos.**

Response: Comment noted. However, the text will remain unchanged. This comment is to be included as an unresolved comment to the FOST.



PROPERTY BOUNDARIES INDICATED ARE APPROXIMATE AND ARE NOT INTENDED TO REPRESENT THE LEGAL DESCRIPTION OF THE PARCEL(S).

ATZP-EP 28 November 1995

MEMORANDUM FOR THE RECORD

SUBJECT: Record of Non-Applicability (RONA) to the Clean Air Act Amendment General Conformity Rule Regarding the Transfer of Real Property Designated for McKinney Homeless Group A Parcel. This Action Covers Activities Associated with Land Conveyances Between the U.S. Army and Peninsula Outreach Welcome House (POWH).

1. Scope Definition: The Department of the Army is considering granting parcels of land located at the former Fort Ord, California in agreement with the McKinney Homeless Act for use by POWH. Buildings situated within subject parcel were formerly utilized by the U.S. Army as military family housing units.

2. Presidio of Monterey, Defense Language Institute is required to make a review of direct and indirect air emission sources for each criteria pollutant as outlined in 40 CFR 51.853 and 93.153 for Federal initiatives located within a region designated as nonattainment to national ambient air quality standards (NAAQS). The analysis is to ensure that Federal actions will not delay or prevent an area from achieving attainment status.

3. Grantee intends to reuse subject buildings transitional and emergency housing.

4. The General Conformity Rule requirements do not apply to subject Federal action under CAA Section 176(c), 40 CFR part 51 subpart W, and pursuant to Section 201(c)2i of Monterey Bay Unified Air Pollution Control District rule, as incorporated into the State Implementation Plan (SIP); where the National Environmental Policy Act (NEPA) documentation was completed prior to 31 January 1994 (*Fort Ord Disposal and Reuse Final Environmental Impact Statement*, Harding Lawson Associates, June 1993).

5. Any utilization of subject parcel by the grantee influencing facility emissions not identified in the SIP, has neither been disclosed to Army Environmental personnel, nor considered in subject General Conformity Rule review.

MARK G. REESE
Air Pollution Environmental Coordinator
Directorate Environmental and Natural
Resources Management
POM, DLIFLC

DEPARTMENT OF THE ARMY
DEFENSE LANGUAGE INSTITUTE FOREIGN LANGUAGE CENTER
AND PRESIDIO OF MONTEREY
PRESIDIO OF MONTEREY, CA 93944-5006

REPLY TO
ATTENTION OF

August 10, 1995

Directorate of Environmental and Natural
Resources Management

Mr. James Austreng
California Environmental Protection Agency
Department of Toxic Substances control
10151 Croydon Way, Suite 3.
Sacramento, California 95827

Approval Memorandum
Proposed No Action
Site 28 - Barracks and Main Garrison Area
Fort Ord, California

Dear Mr. Austreng:

This letter presents the approval memorandum for No Action (NoA) Site 28 - Barracks and Main Garrison Area, Fort Ord, California. Copies of this letter have been sent to the United States Environmental Protection Agency (EPA), and departments of the California Environmental Protection Agency (Cal/EPA), including the Central Coast Regional Water Quality Control Board (RWQCB) and the Department of Toxic Substances Control (DTSC).

No further action is proposed for Site 28. Site 28 meets the criteria specified in the approved *No Action Plug-in Record of Decision, Fort Ord, California* (NoA ROD) dated February 1994. The NoA ROD outlined a process and established necessary criteria for identifying and approving sites for NoA. NoA sites at Fort Ord are either Category 1 sites that are already in a protective state and pose no current or potential future threat to human health or the environment, or Category 2 sites, for which CERCLA does not provide authority to take any remedial action. This approval memorandum provides a description of the site and completed investigations, and demonstrates the site's conformance with the NoA criteria for Category 1 sites established in the NoA ROD.

CHARACTERIZATION REPORT SUMMARY

The Army has prepared the *Draft Final Site Characterization Report, Site 28 - Barracks and Main Garrison Area (July 3, 1995)*. Site 28 consists of four buildings and surrounding areas, all located west of Second Avenue in the Main Garrison: the Visual Information Center (Building T-2842); the Photo Developing Unit (Building T-2850); the Print Shop (Building T-2353); and Building T-2000 (a former laundromat). The purpose of the site characterization was to assess conditions associated with the use of chemicals at these four buildings, and to investigate a possible dry well at Building T-2000.

Field Program

Soil gas samples were collected from 10 locations each around both the Visual Information Center and the Print Shop. The soil gas samples were analyzed for total recoverable hydrocarbons (TRPH); benzene, toluene, ethylbenzene, xylenes, tetrachloroethene, trichloroethene, 1,1,1-trichloroethane, cis-1,2-dichloroethene, trans-1,2-dichloroethene, and vinyl chloride. Six soil borings were drilled and a total of 21 soil samples were collected and submitted for chemical analysis at Site 28. Three soil borings were drilled at both the Visual Information Center and the Print Shop to a maximum depth of approximately 21 feet below ground surface (bgs). Three soil samples were collected from each of these 6 borings. In addition to the 18 samples collected from borings at the Visual Information Center and the Print Shop, 3 surface soil samples were collected from beneath the Photo Developing Unit. All soil samples were analyzed for volatile organic compounds (VOCs) and pH; the 3 surface soil samples from beneath the Photo Developing Unit were also analyzed for priority pollutant metals.

Subsurface Conditions

Subsurface soil at Site 28 consists of fine- to medium-grained sand and silty sand. Particle size analysis indicates that the soil is generally classified as sand and sand with clay. The color varies from brown to yellowish-brown. Groundwater was not encountered during drilling. The depth to groundwater at the site is approximately 100 feet bgs based on groundwater levels measured under the basewide monitoring program and on information presented in the *Draft Basewide Hydrogeologic Characterization*, dated June 10, 1993.

Analytical Results

A comparison of maximum detected chemical concentrations of site-related chemicals (SRCs) detected in soil at Site 28 with preliminary remediation goals (PRGs) is provided in Table 1. PRGs are chemical concentrations in soil expected to result in acceptable cancer risks (i.e., one-in-one-million) and noncancer health effects. Except for acetone, no VOC concentrations were reported above the laboratory reporting limits. Acetone was detected above the reporting limit in 4 soil samples at a maximum detected concentration of 27 µg/kg (which is less than 5 times the reporting limit). Acetone was therefore assumed to be a laboratory contaminant and was not evaluated as a SRC. Six metals were detected above the background values established for Fort Ord (Table 2); these metals were therefore evaluated as SRCs (Table 1). None of these 6 metals were detected above PRGs. All other inorganic compounds analyzed for were either not detected or detected at concentrations below the background values (Table 2).

Health Risk Evaluation

The NoA ROD identified Category 1 sites as sites where the level of contamination is below the levels required for protection of human health (e.g., PRGs) and the environment. PRGs were developed specifically for Fort Ord and represent soil concentrations considered to result in estimated daily doses (1) associated with an estimated one-in-one-million probability that an exposed individual would develop cancer (i.e., 10^{-6} cancer risk) or (2) expected to be without appreciable risk of deleterious noncancer health effects (i.e., hazard quotient less than 1). The methodology and assumptions used to develop PRGs were presented in the *Draft Final Technical Memorandum, Preliminary Remediation Goals*, dated June 24, 1994. The PRGs were used to evaluate contributions site-related chemicals (SRCs) might make to cumulative area-related health risks.

The screening risk evaluation presented in the *Draft Final Site Characterization, Site 28 - Barracks and Main Garrison Area*, dated July 3, 1995, identified six potentially site-related chemicals (SRCs): chromium (total), copper, lead, mercury, silver, and zinc (Table 1). PRGs for the Site 28 SRCs were used to assess the need for further action at the site by calculating ratios of the chemical concentrations to the PRGs. The chemical concentrations used in the ratios included the:

Maximum detected site concentration (MSC)

The portion of the MSC attributable to background, i.e., the threshold or maximum background concentration (MBC)

Calculated component concentration representing the portion attributable to site activities, i.e., maximum site-related concentration (MSRC).

A chemical-specific ratio less than or equal to 1 indicates the maximum detected or calculated concentration is less than or equal to the PRG and, therefore, that substantial health risks are not likely to be associated with that chemical. To evaluate the possible exposure to multiple chemicals, the effects of multiple chemicals were assumed to be additive, and the chemical-specific ratios were added together to calculate a ratio sum. Table 6 of the *Draft Final Site Characterization, Site 28 - Barracks and Main Garrison Area* presents a site-related ratio sum which combines both possible cancer risk and noncancer health effects. Based on regulatory agency comments and to conservatively evaluate possible cumulative effects of multiple chemicals, Table 1 of this approval memorandum presents separate ratio sums addressing possible cancer risk and noncancer health effects. A ratio sum less than 1 indicates that substantial health risks are not likely to be associated with exposure to the multiple chemicals evaluated. The ratios and ratio sums for site-related chemicals are presented in Table 1.

As shown in Table 1, the MSRCs for the six chemicals are below their respective PRGs and the resulting MSRC/PRG ratios are less than 1. The total chemical MSRC/PRG ratio sum of 0.66 is also less than 1 (Table 1), indicating that health risks from possible exposure to the six site-related chemicals are acceptably low.

Potential Groundwater Impacts

The *Draft Final Site Characterization, Site 28 - Barracks and Main Garrison Area*, dated July 3, 1995, presents a qualitative evaluation of the potential impacts of SRCs to groundwater at the site. The results of this evaluation indicate that no significant groundwater impacts are expected from the concentrations of the six site-related chemicals detected at the site.

Ecological Risk Evaluation

A preliminary hazard assessment was conducted for Site 28 as part of the quantitative ecological risk assessment and is presented in the *Basewide Remedial Investigation/Feasibility Study (RI/FS), Fort Ord, California, Volume IV*. That assessment indicated that no risks to the environment are expected because: (1) the site is developed, (2) the detected chemicals are either present beneath pavement and below the depth of plant roots, or beneath buildings in areas not suitable for supporting ecological receptors, and (3) no potentially complete exposure pathways were identified for species associated with ecological assessment endpoints.

RECOMMENDED ACTION

On the basis of the investigation completed and summarized above, no further action at Site 28 is recommended under the remedial investigation/feasibility study (RI/FS) at Fort Ord.

Please feel free to contact Ms. Gail Youngblood, BRAC Environmental Coordinator at (408) 242-7918 with any questions you may have regarding the proposed No Action. Notification of the proposed No Action will be placed in a major local newspaper within 2 weeks of approval of this memorandum.

Your prompt attention to this proposed No Action Approval Memorandum in sincerely appreciated.

Sincerely,

James M. Wilson
Director, Environmental and Natural
Resources Management

Enclosures: Table 1 Comparison of Concentrations of Site-Related Chemicals with Preliminary Remediation Goals

Table 2 Comparison of Maximum Metals Concentrations in Soil with PRGs and Background Threshold Values

Plate 1 Site Plan

Table 1. Comparison of Concentrations of Site-Related Chemicals with Preliminary Remediation Goals
Site 28 - Barracks and Main Garrison Area
Fort Ord, California

Chemical	CONCENTRATIONS				RATIOS /a/		
	Maximum Detected Site Concentration (MSC) (mg/kg) /b/	Maximum (or Threshold) Background Concentration (MBC) /c/ (mg/kg)	Maximum Site-Related Concentration (MSRC) /d/ (mg/kg)	Preliminary Remediation Goal (PRG) /e/ (mg/kg)	Chemical Total MSC/PRG Ratio	Background-Related MBC/PRG Ratio /f/	Site-Related MSRC/PRG Ratio /g/
PRGs Based on Cancer Risk							
	NA	NA	NA	NA	NA	NA	NA
			Ratio Sum (Cancer Risk Basis) /h,i/		0.000	0.000	0.000
PRGs Based on Noncancer Health Effects							
Chromium (Total)	27.40	24.00	3.40	67,000 /j/	0.000 /k/	0.000 /k/	0.000 /k/
Copper	42.40	18.20	24.20	2,500	0.017	0.007	0.010
Lead	155	51.80	103.2	240	0.646	0.216	0.430
Mercury	0.31	0.12	0.19	20	0.016	0.006	0.010
Silver	72.50	0.36	72.14	340	0.213	0.001	0.212
Zinc	93.50	75.80	17.70	20,000	0.005	0.004	0.001
		Ratio Sum (Noncancer Health Effects Basis) /i/			0.90	0.23	0.66

Source: Draft Site Characterization, Site 28 - Barracks and Main Garrison Area, Fort Ord, California, dated July 3, 1995.
NA = Not available or not applicable.
/a/ All ratios are reported to three decimal places to facilitate verifying computations, not to reflect the precision of the analysis.
/b/ Milligrams per kilogram.
/c/ From: Tables 19 and 20, Draft Final Basewide Background Soil Investigation, dated March 15, 1993.
/d/ MSRC = MSC - MBC.
/e/ From: Draft Final Technical Memorandum, Preliminary Remediation Goals, dated June 24, 1994 and Draft Final Basewide Background Soil Investigation, dated March 15, 1993.
/f/ Risks reflected are those not associated with site activity.
/g/ Addresses only chemical concentrations that might be related to site activity (no background component).
/h/ For site-related chemicals at Site 28, all PRGs are based on noncancer health effects.
/i/ Ratio Sum Subtotal or Total = Sum of MSC/PRG, MBC/PRG, and MSRC/PRG ratios. These sums are reported to two decimal places to facilitate verifying computations, not to reflect the precision of the analysis.
/j/ No PRG was developed for total chromium; the PRG for chromium III was used to evaluate detected concentrations of total chromium.
/k/ Calculated ratio is less than 0.0005.

Table 2. Comparison of Maximum Metal Concentrations in Soil
with PRGs and Background Threshold Values
Site 28 - Barracks and Main Garrison Area
Fort Ord, California

Detected Chemicals	Maximum Chemical Concentrations Detected in Soil (mg/kg)		PRG[3] (mg/kg)	Background Thresholds Shallow NQTP[4] (mg/kg)	Background Threshold Deep NQTP[5] (mg/kg)
	Shallow NQTP[1]	Deep NQTP[2]			
Mercury	0.31	NA	20	0.12[6]	NA
Lead	155	NA	240	51.8[6]	3.7[6]
Thallium	NA	NA	4.8	0.45[6]	0.39[6]
Beryllium	0.12	NA	0.39	0.35	0.48
Cadmium	1.20	NA	8.1	NA	1.9[6]
Chromium	27.40	NA	NA	24.0	16.61
Copper	42.40	NA	2,500	18.2[6]	8.2[6]
Nickel	10.00	NA	130	58[6]	19.5[6]
Silver	72.50	NA	340	0.36[6]	0.49[6]
Zinc	93.50	NA	20,000	75.8[6]	13.9[6]

NQTP Qal, Qoal, Oar, Qod, Qd, Tsm

[1] Soil sample collected from 0 to 2 feet and derived from the following geologic units: Qal, Qoal, Qar, Qod, Qd, Tsm

[2] Soil sample collected at a depth greater than 2 feet and derived from the following geologic units: Qal, Qoal, Qar, Qod, Qd, Tsm

[3] Lowest PRG values from *Draft Technical Memorandum, Preliminary Remediation* Goals, dated June 14, 1993.

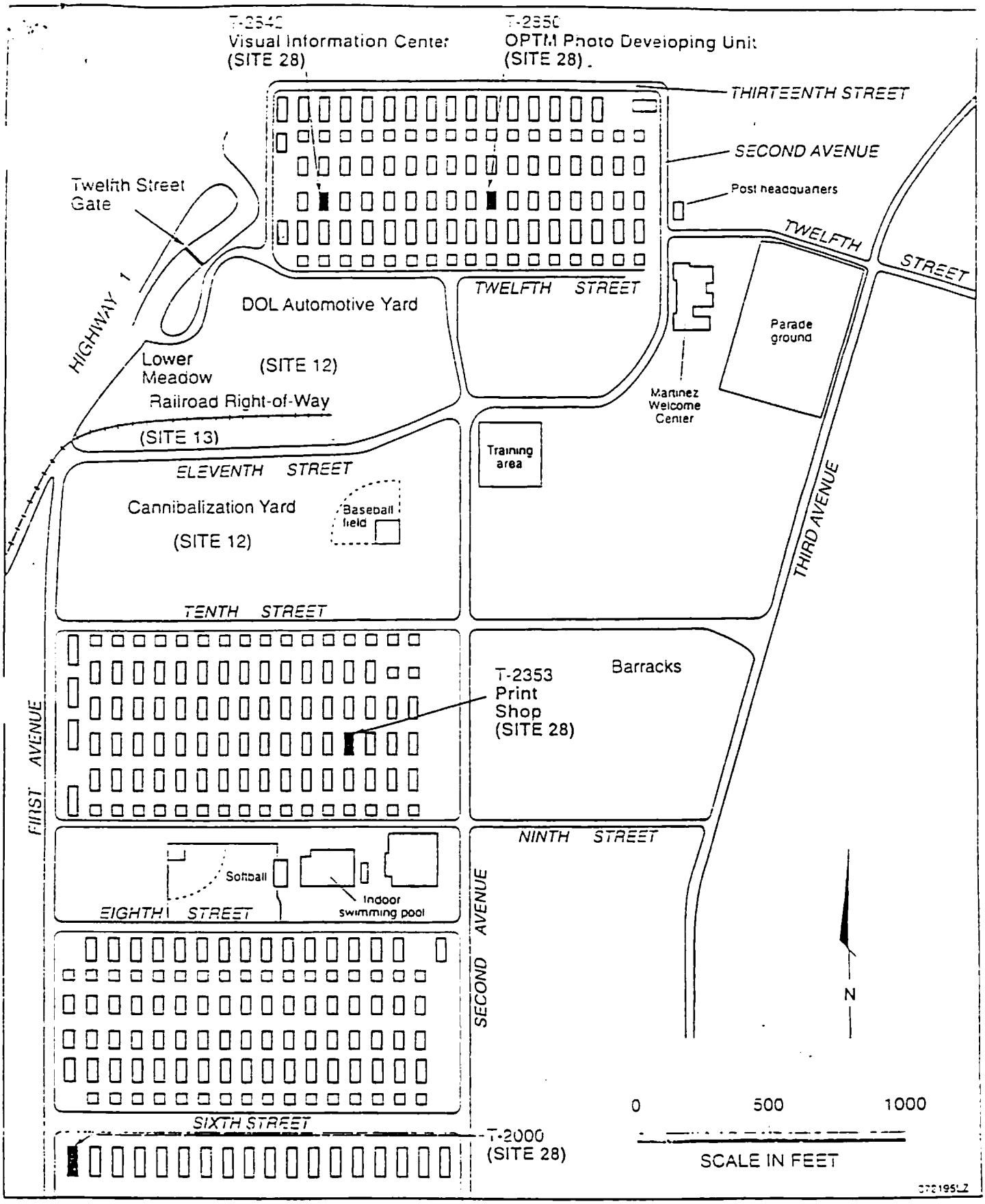
[4] Shallow NQTP soil type estimated threshold values from Table 20, *Draft Final Basewide Background Soil Investigation*, dated March 15, 1993

[5] Deep NQTP soil type estimated threshold values from Table 20, Draft Final Basewide Background Soil Investigation, dated March 15, 1993

[6] Maximum background value from Table 19, *Draft Final Basewide Background Soil Investigation*, dated March 15, 1993

NA Not applicable

g/kg Milligrams per kilogram



Harding Lawson Associates
Engineering and Environmental Services

Site Plan
Approval Memorandum, Proposed No Action
Site 28 - Barracks and Main Garrison Area
Fort Ord, California

PLATE 1

DRAWN	PROJECT NUMBER	APPROVED	DATE	REVISED DATE
RG	23366 08971		7/95	