

APPENDIX A
RESPONSES TO AGENCY COMMENTS ON
DRAFT EBS/FOSTs
MCKINNEY GROUP C PARCELS

RESPONSES TO U.S. EPA COMMENTS (12/15/95)
DRAFT EBS/FOSTs
McKINNEY HOMELESS ACT GROUP C PARCELS
FORMER FORT ORD, CALIFORNIA

ENVIRONMENTAL BASELINE SURVEY (EBS) COMMENTS

Comment 1: Section 3.0, Page 9, paragraph 2. "New information may be available in the future because some of the programs are ongoing." Is the Army expecting to discover new information about contamination on the Group C parcels? If so, what are the possible impacts for imminent transfer of these parcels? If not, perhaps this sentence should be modified.

Response: The statement that new information regarding environmental conditions may become available is true for the installation as a whole. However, the Army does not expect there to be significant additional information made available regarding the McKinney Group C Parcels. The wording in this paragraph has been modified for clarity and the final sentence deleted.

Comment 2: Section 4.9.1.2, third paragraph, page 24, and Plates 8 and 9. The text should be revised to state that EPA, in its April 19, 1994 CERFA concurrence letter, did not concur that all CERFA Parcels with Qualifiers, particularly those suspected of containing ordnance and explosive waste, were suitable for transfer under CERCLA §120(h)(4). In addition, where EPA has given concurrence that a CERFA Parcel with Qualifiers meets the requirements of CERCLA §120(h)(4), why is the Army proposing to transfer it under CERCLA §120(h)(3)?

Response: The EBS has been revised to reflect that the EPA did not necessarily concur with all the Army's parcel categorizations in the final CERFA report. The Army will transfer those CERFA with qualifiers parcels that the EPA has concurred are CERFA "uncontaminated" under CERCLA §120(h)(4).

Comment 3: Page 26, section 4.9.2.2. The second to last paragraph of this section states that potential risks for the area will be low because "...ingestion of groundwater from the contaminated aquifer is unlikely (drinking water is currently available from other sources)." Not only is the ingestion of groundwater "unlikely", but EPA understands that it will be prohibited based on local ordinances already in place which prevent pumping groundwater from affected aquifers and on deed restrictions which the Army will place on the property at the time of transfer. Please enhance the discussion in this section.

Response: As appropriate, the EBS has been revised to indicate that "...ingestion of contaminated groundwater from the affected aquifer will be prohibited through use restrictions to be included in the deed." The FOSTs for specific parcels will mention the prohibition against well drilling and use of groundwater which will be included in the deeds as a use restriction.

Comment 4: Page 31, Section 5.2, and Plate 9. As discussed in comments on the Housing Authority of Monterey County Parcel (10 Buildings) FOST below, EPA believes the

parcel should be transferred under CERCLA §120(h)(4), unless the Army has new information to suggest otherwise.

Response: The EBS has been revised to state that the HAEC Parcel (10 buildings) will be transferred under CERCLA §120(h)(4) as discussed in the response to Comment 2 above.

FINDING OF SUITABILITY TO TRANSFER (FOST) COMMENTS:

Draft FOST for Housing Authority of Monterey County Parcel (Buildings T 2793, T-2795, and T-2797))

Comment 1: The CERCLA §120(h)(1) and (h)(3) notices for the releases of volatile organic compounds to groundwater should be included, similar to what was done in the Golden Gate University Parcel FOST, because low levels of VOCs from OU-2 and/or Sites 2/12 are suspected of existing in the groundwater beneath this parcel. List the specific chemicals released and their concentration in groundwater (as an indicator of the magnitude of the release).

Response: Unlike the Golden Gate University Parcel, historical and recent groundwater sampling in the vicinity of this parcel does not indicate that groundwater beneath this property contains volatile organic compounds (VOCs) above laboratory detection limits of 0.5 microgram per liter. Therefore, notice of hazardous substance storage, release, or disposal under CERCLA § 120(h)(1) is not necessary.

Comment 2: Page 1, second bullet. Please provide additional information in the FOST with regard to the significance of the friable asbestos mentioned in the bullet.

Response: Comment noted; the discussion of ACM in the FOST has been expanded.

Comment 3: Page 1, third bullet. Does the Army suspect that exterior lead-based paint may have been released to the environment? If so, please provide information to document whether it could present a threat to future users of the property.

Response: The Army conducts its Lead-Based Paint Management Program in accordance with Public Law 102-550 and following DoD and Army policy and guidelines. For buildings built prior to 1960 and intended for reuse as residences, the Army plans to conduct sampling and abatement of LBP within and surrounding the buildings in accordance with Public Law 102-550. For structures built after 1960 but prior to 1978, the Army is required to disclose the suspected presence of LBP in and around the structures, but is not under obligation to remove it even if the structures are to be used as residences.

Comment 4: Page 2, sixth bullet. The text should mention that the CERFA Report also disqualified this area due to the potential for groundwater contamination in this area between the OU-2 and Sites 2/12 plumes. In addition, the Army indicated to EPA at a recent project manager meeting that new data from piezometer and monitoring well sampling suggests that the Sites 2/12 groundwater plume may extend further in the easterly direction towards this parcel. Please provide EPA with an up-to-date groundwater isoconcentration map for this area.

Response: Comment noted; the text has been revised to discuss the potential for groundwater contamination from OU2 and Site 2/12. The TCE isoconcentration maps for the September 1995 sampling round have been forwarded separately to the EPA and DTSC in the basewide groundwater monitoring report. This information does not indicate that the groundwater beneath the HAEC Parcel is affected by groundwater contamination from these sites.

Comment 5: **Page 2, last bullet. Given the proximity of this parcel to the OU-2 and Sites 2/12 groundwater plumes, does the Army intend on placing a restriction in the deed prohibiting the drilling of wells?**

Response: Because the groundwater beneath the HAEC Parcel is not believed to contain detectable concentrations of VOCs, the FOST will not include the restriction on well drilling and use of groundwater.

Comment 6: **Page 3, Notice of the Presence of Asbestos paragraph. We have verbally discussed our concern regarding this paragraph with the Army and understand that the paragraph will not be revised. Therefore, we suggest that the following text be attached as an unresolved comment:**

Public Law 102-484, as amended by Public Law 103-160, provides for indemnification by the military services when property on closing military bases is transferred. 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 damage 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. It is unclear whether the FOST's statements on the Army not assuming liability for the transferee's contact with asbestos are consistent with the indemnification required by law. To avoid confusion over the indemnification that the Army is required to provide, EPA recommends that the mention of future liability be deleted and that the statutory language be relied on to determine any future liability.

Response: Comment noted; this comment will be included as an unresolved comment attached to the FOST.

Draft FOST for Vietnam Veterans of Monterey County Parcel (26 Buildings)

Comment 1: **Page 1, second bullet. This parcel contains buildings with asbestos that has been characterized as in the need of immediate/short term repair/removal? The FOST should disclose whether the Army will repair and/or remove the asbestos prior to transfer or whether use restrictions are necessary.**

Response: The FOST has been revised to state that the Army does not intend to remove or repair the ACM present in these structures. A Notice of the Presence of Asbestos, which includes use restrictions, is included in the FOST.

Comment 2: **Page 2, first bullet. Does the Army suspect that exterior lead-based paint may have been released to the environment? If so, please provide information to document whether it could present a threat to future users of the property.**

Response: The Army conducts its Lead-Based Paint Management Program in accordance with Public Law 102-550 and following DoD and Army policy and guidelines. For buildings built prior to 1960 and intended for reuse as residences, the Army plans to conduct sampling and abatement of LBP within and surrounding the buildings in accordance with Public Law 102-550. For structures built after 1960 but prior to 1978, the Army is required to disclose the suspected presence of LBP in and around the structures, but is not under obligation to remove it even if the structures are to be used as residences.

Comment 3: **Page 2, fifth bullet. Please provide more information, such as that found in the EBS, to support the Army's conclusion that OE is not an issue at this site.**

Response: The discussion of OE for the 75-mm Pack Howitzer Firing Point has been expanded to include more information from the EBS.

Comment 4: **Page 3, first full bullet. Based on the discussion in this and the previous bullet, the CERCLA §120(h)(1) and (h)(3) notices for the releases of volatile organic compounds to groundwater should be included, similar to what was done in the Golden Gate University Parcel FOST, because low levels of VOCs from OU-2 and/or Sites 2/12 are suspected of existing in the groundwater beneath this parcel. List the specific chemicals released and their concentration in groundwater (as an indicator of the magnitude of the release).**

In addition, given the proximity of this parcel to the OU-2 and Sites 2/12 groundwater plumes, does the Army intend on placing a restriction in the deed prohibiting the drilling of wells?

Response: Unlike the Golden Gate University Parcel, historical and recent groundwater sampling in the vicinity of this parcel does not indicate that groundwater beneath most of this property contains volatile organic compounds (VOCs) above laboratory detection limits of 0.5 microgram per liter ($\mu\text{g/L}$). Groundwater with trichloroethene (TCE) concentrations between 1 and 5 $\mu\text{g/L}$ may be present beneath Buildings T-2988, T-2990, and possibly some of the housing units. Notice of the presence of contaminated groundwater per CERCLA § 120(h)(1) will be included in the FOST. The FOST will include a table showing the maximum VOC concentrations elsewhere in the plume, a notice of the potential presence of contaminated groundwater, and the requested restriction on well drilling and use of groundwater.

Comment 5: **Page 3, Notice of the Presence of Asbestos paragraph. We have verbally discussed our concern regarding this paragraph with the Army and understand that the**

paragraph will not be revised. Therefore, we suggest that the following text be attached as an unresolved comment:

Public Law 102-484, as amended by Public Law 103-160, provides for indemnification by the military services when property on closing military bases is transferred. 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 damage 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. It is unclear whether the FOST's statements on the Army not assuming liability for the transferee's contact with asbestos are consistent with the indemnification required by law. To avoid confusion over the indemnification that the Army is required to provide, EPA recommends that the mention of future liability be deleted and that the statutory language be relied on to determine any future liability.

Response: Comment noted; this comment will be included as an unresolved comment attached to the FOST.

Draft FOST for HAEC Parcel (10 Buildings)

Comment 1: Page 2, Notice of the Presence of Asbestos paragraph. We have verbally discussed our concern regarding this paragraph with the Army and understand that the paragraph will not be revised. Therefore, we suggest that the following text be attached as an unresolved comment:

Public Law 102-484, as amended by Public Law 103-160, provides for indemnification by the military services when property on closing military bases is transferred. 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 damage 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. It is unclear whether the FOST's statements on the Army not assuming liability for the transferee's contact with asbestos are consistent with the indemnification required by law. To avoid confusion over the indemnification that the Army is required to provide, EPA recommends that the mention of future liability be deleted and that the statutory language be relied on to determine any future liability.

Response: Comment noted; this comment will be included as an unresolved comment attached to the FOST.

Comment 2: Page 3, last paragraph, and Page 2, sixth bullet. Based on EPA's April 19, 1994 CERFA concurrence letter, EPA concurred with the Army that this property is suitable for transfer under CERCLA §120(h)(4), knowing that the buildings may contain asbestos. The proposal to transfer this parcel under CERCLA §120(h)(3) appears to be in error.

Response: This parcel will be transferred under CERCLA §120(h)(4) as noted in response to Comment 4 on EBS.

Draft FOST for Interim, Inc. Parcel

Comment 1: Page 2, sixth bullet. Based on the discussion in this bullet, the CERCLA §120(h)(1) and (h)(3) notices for the releases of volatile organic compounds to groundwater should be included, similar to what was done in the Golden Gate University Parcel FOST, because low levels of VOCs from OU-2 are suspected of existing in the groundwater beneath this parcel. List the specific chemicals released and their concentration in groundwater (as an indicator of the magnitude of the release).

Response: Recent and historical groundwater sampling in the vicinity of this parcel indicates that groundwater beneath this property may contain volatile organic compounds (VOCs) at 1 microgram per liter or less. Notice of hazardous substance release under CERCLA § 120(h)(1) will be included in the FOST. The FOST will include a table showing the maximum VOC concentrations elsewhere in the plume, a notice of the potential presence of contaminated groundwater, and a restriction on well drilling and use of groundwater.

Comment 2: Page 2, seventh bullet. Given the proximity of this parcel to the OU-2 groundwater plume, does the Army intend on placing a restriction in the deed prohibiting the drilling of wells?

Response: The FOST will include the requested restriction on well drilling and use of groundwater.

Comment 3: Page 3, Notice of the Presence of Asbestos paragraph. We have verbally discussed our concern regarding this paragraph with the Army and understand that the paragraph will not be revised. Therefore, we suggest that the following text be attached as an unresolved comment:

Public Law 102-484, as amended by Public Law 103-140, provides for indemnification by the military services when property on closing military bases is transferred. 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 damage 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. It is unclear whether the FOST's statement on the Army not assuming liability for the transferee's contact with asbestos are consistent with the indemnification required by law. To avoid confusion over the indemnification that the Army is required to provide, EPA recommends that the mention of future liability be deleted and that the statutory language be relied on to determine any future liability.

Response: Comment noted; this comment will be included as an unresolved comment attached to the FOST.

RESPONSE TO DTSC COMMENTS (12/18/95)
DRAFT EBS/FOST
MCKINNEY HOMELESS ACT GROUP C PARCEL
FORMER FORT ORD, CALIFORNIA

Comments for EBS:

Comment 1: Page 11, Section 3.3, Visual Inspections: The text states that "... only a limited number of visual inspections for the McKinney Group C Parcels were conducted during the EBS." This EBS relies upon previous inspections accomplished during routine investigations associated with the installation restoration areas. In accordance with Department of Defense FOST/Finding of Suitability to Lease policy, visual inspections should be specifically conducted for the EBS to ensure that the environmental condition of a parcel has not changed since previously inspected. This is especially important if a significant period of time has passed since the property was last inspected. Please provide the dates of these previous inspections.

Response: As stated in the EBS, limited visual inspections of the McKinney Group C Parcels were conducted during preparation of the EBS to confirm the information from previous investigations. The Army did not rely solely on the results of the previous investigations as the DTSC implies. The dates of the previous inspections are noted in the reports of investigations cited in the EBS.

Comment 2: Page 27, Section 4.10, Potential Impacts from Adjoining Properties: Please provide statements which more clearly reflect the Army's conclusion regarding the potential impact to the McKinney Group C Parcels from the various adjacent contaminated areas.

Response: A concluding sentence stating that the identified environmental conditions on adjoining properties are not expected to affect the McKinney Group C Parcels has been added.

Comment 3: Page 13, Section 4.1.2, Program Status and EBS Results: What are the Army's plans regarding buildings containing asbestos (e.g. Buildings T-2990 and 2798) identified for immediate repair? Will repair/removal occur prior to transfer?

Response: Under Army policy the ACM identified in Buildings T-2990 and T-2798 will not be repaired by the Army either before or after transfer. The recipient of the property will be responsible for ACM repair/removal.

Comment 4: Page 13, Section 4.1.2, Program Status and EBS Results: Please clarify how the asbestos "numerical condition assessment ratings" for various buildings correlate to the condition of asbestos, that is, whether the asbestos is damaged, deteriorated or in good condition. This point is unclear, for example, the text states that building T2990 contains non-friable asbestos containing material in good condition but has a rating of 2 (immediate repair/short-term removal recommended). If the asbestos is in good condition, why does it need immediate repair? In any case, the Army should disclose the condition of asbestos (e.g. damaged or deteriorated) for all buildings.

Response: The numerical condition assessment ratings for ACM assigned to buildings surveyed by the Army's contractor were a means to identify and rank potential health hazards posed by the ACM identified. The response/removal actions were recommendations and are not requirements for the Army to perform any actions. The condition of the ACM may or may not be directly related to the ranking. For example, the ACM in Building T-2990 was rated 2 even though it is in good condition because it presented a potential hazard being in the air handling system of the building. The condition of the ACM, if known, will also be specified in the FOSTs.

Comment 5: **Page 14, Section 4.2, Lead-Based Paint Management Program: DTSC has new information showing elevated lead levels in soils surrounding some housing structures containing lead-based paint (LBP) at Department of Defense facilities. DTSC, therefore, recommends the Army conduct soil sampling to confirm whether lead in soil surrounding housing structures containing LBP, if any, pose a threat to human health or the environment. The sampling strategy should be developed in consultation with, and approval by the Base Realignment and Closure (BRAC) Cleanup Team.**

Response: The Army conducts its Lead-Based Paint Management Program in accordance with Public Law 102-550 and following DoD and Army policy and guidelines. For buildings built prior to 1960 and intended for reuse as residences, the Army plans to conduct sampling and abatement of LBP within and surrounding the buildings in accordance with Public Law 102-550. For structures built after 1960 but prior to 1978, the Army is required to disclose the suspected presence of LBP in and around the structures, but is not under obligation to remove it even if the structures are to be used as residences.

Comment 6: **Page 15, Section 4.2, Lead-based Paint Management Program: Please clarify the Army's obligation, based on Army and Department of Defense LBP Policy, to complete LBP surveys for each structure before property is conveyed for residential purposes. For example, the Army makes conclusions regarding LBP on structures intended for use by families based on representative sampling of like structures. Also, the text states "No hazard assessment was conducted . . . ", please clarify the Army's obligation under Department of Defense (DoD) policy to inspect and abate LBP hazards for pre-1960 structures before the property is conveyed for residential use whether the abatement is performed by the Army or property recipient. Are you required to evaluate each pre-1960 structure?**

Response: Please see response to Comment 5 above. As stated in the EBS, the Army has performed LBP surveys of selected representative units in the homogeneous housing areas at former Fort Ord. On the basis of the surveys, it is presumed that the unsurveyed units would be similar to the surveyed units in these homogenous housing areas.

Comment 7: **Page 24, Section 4.9.1.2, Program Status and EBS Results and Table 8: We would like to clarify the following point regarding the standard text found under this section in EBSs submitted to date: The text references Table 8 which lists the definitions of Community Environmental Response Facilitation Act (CERFA) Categories developed in the Army's CERFA report. Both United States Environmental Protection Agency (U.S. EPA) and DTSC did not agree with the**

definition of "CERFA" and "CERFA With Qualifier" in the CERFA Report and found in Table 8 of the EBS. Primarily, this was because the definitions included property containing unexploded ordnance. Consequently, some of the parcels the Army designated as CERFA with qualifier did not receive U.S. EPA concurrence and are therefore not considered CERFA parcels.

Response: Comments noted; a sentence has been added to this section noting that the EPA and the DTSC did not necessarily concur with the Army's identification of CERFA uncontaminated property in all cases. However, transfer of property under CERCLA §120(h)(4) includes only those areas for which the EPA did provide concurrence as uncontaminated.

Comment 8: Page 31, Section 5.2: As mentioned in our comment for the FOST below, we believe that the HAEC Parcel (10 buildings - Subarea C-2) should be transferred pursuant to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h)(4) since U.S. EPA concurred on this parcel as being "uncontaminated" under CERFA.

Response: The EBS has been revised to state that the HAEC Parcel (10 buildings) will be transferred under CERCLA §120(h)(4).

Comments for FOST Housing Authority of Monterey County Parcel (Buildings T-2793, T2795 and T-2797):

Comment 1: Page 1, Second bullet: Statements regarding asbestos should include the condition of the asbestos. For example, is the asbestos damaged or deteriorated?

Response: The FOST has been revised to reflect the condition of the ACM present in these buildings.

Comment 2: Page 2, Sixth bullet: The FOST should state that this parcel was also disqualified under CERFA because of the potential for groundwater contamination from Operable Unit (OU) 2 and Sites 2/12 plumes. Please provide to DTSC and the RWQCB a revised groundwater isoconcentration map for this area.

Response: Comment noted; the text has been revised to discuss the potential for groundwater contamination from OU2 and Site 2/12. TCE isoconcentration maps for the September 1995 sampling round have been forwarded separately to the EPA and DTSC in the annual basewide groundwater monitoring report. This information does not indicate that the groundwater beneath the HAEC Parcel is affected by groundwater contamination from these sites.

Comment 3: Page 4. Please address the notification requirements under CERCLA Section 120(h)(1) and (3) since contaminants from OU-2 and possibly Sites 2/12 are suspected of existing in groundwater beneath this parcel.

Response: The statement in the draft FOST that groundwater beneath the parcel contains chemicals below remediation levels was not correct. Historical and recent groundwater sampling in the vicinity of the parcel does not indicate that groundwater beneath the property contains volatile organic compounds above

laboratory detection limits of 0.5 microgram per liter. Therefore, notice of hazardous substance storage, release, or disposal under CERCLA §120(h)(1) is not necessary.

Comment 4: Please provide the Army's conclusion regarding the impact of the OU-2 and Sites 2/12 groundwater plumes on this parcel. Appropriate restrictions regarding use of groundwater should be included. Are restrictions necessary?

Response: Because the groundwater beneath the HAEC Parcel is not believed to contain detectable concentrations of VOCs, no restrictions on well drilling and use of groundwater will be included in the FOST for the HAEC Parcel.

Comment 5: Since this parcel is intended for use as transitional housing, DTSC recommends the Army sample the soils surrounding structures containing lead-based paint to confirm that residual lead levels, if any, do not pose a threat to human health or the environment prior to transfer.

Response: Please see response to EBS Comments 5 and 6. These three buildings will be used for administrative purposes to support the transitional housing located in Abrams Park (10 buildings). The FOST has been revised to reflect this point.

Comments for FOST on Vietnam Veterans of Monterey County Parcel (26 buildings):

Comment 1: Page 1, second bullet: It would be helpful to include a statement about the condition of the asbestos in the buildings on the parcel. Also, the EBS notes that buildings on this parcel are identified for immediate repair. The FOST should address whether the Army will repair or remove asbestos prior to transfer.

Response: The FOST has been revised to discuss the condition of the ACM present in buildings located on the VVMC Parcel. In accordance with Public Law 102-550, the Army is not under obligation to remove or repair the ACM identified in these buildings.

Comment 2: Page 2 of 2. Please address the notification requirements under CERCLA Section 120(h)(1) and (3) since the groundwater contains contaminants. Given the proximity of Sites 2/12 groundwater plume to this parcel, please provide the Army's position on potential impacts to this parcel. Are restrictions necessary?

Response: Recent and historical groundwater sampling in the vicinity of this parcel does not indicate that groundwater beneath most of the property contains volatile organic compounds above laboratory detection limits of 0.5 microgram per liter ($\mu\text{g/L}$). Trichloroethene (TCE) concentrations between 1 and 5 $\mu\text{g/L}$ may be present beneath Buildings T-2988, T-2990 and possibly some of the housing units. Notice of hazardous substance release under CERCLA §120(h)(1) will be included in the FOST. The FOST will include a table showing the maximum VOC concentrations elsewhere in the plume, a notice of the potential presence of contaminated groundwater, and a restriction on well drilling and the use of groundwater.

Comment 3: The FOST states "Groundwater beneath the Property likely contains chemicals below remediation levels". The Army should confirm the levels of contaminants in groundwater or address the need for a restriction in the FOST and deed which prevents extraction and consumption of groundwater.

Response: Please see response to Comment 2 above. Restrictions on well drilling and use of groundwater will be included in the FOST.

Comment 4: Since this parcel is intended for use as transitional housing, DTSC recommends the Army sample the soils surrounding structures containing lead-based paint to confirm that residual lead levels, if any, do not pose a threat to human health or the environment prior to transfer.

Response: Please see response to EBS comments 5 and 6.

Comments for FOST on Housing Authority of Monterey County Parcel (10 Buildings):

Comment: We understand that U.S. EPA concurred with the Army that this property is "uncontaminated" and suitable for transfer under CERCLA Section 120(h)(4). Why does the Army want to transfer this property under CERCLA Section 120(h)(3)?

Response: Please see response to EBS Comment 8.

Comments for FOST on Interim, Inc., Parcel:

Comment 1: Page 1, 3rd bullet. The FOST should include date of construction of the four buildings located on parcel. What is the Army's obligation under DoD policy to survey each building for the presence of LBP?

Response: The FOST has been revised to include the date of construction (1978) of these buildings. The Army has performed LBP surveys of selected representative units in the homogeneous housing areas of Fort Ord. On the basis of the surveys, it is presumed that the rest of the similar units in these areas contain LBP. The Army does not intend to perform surveys of these individual housing units because they were constructed in 1978.

Comment 2: Page 2, 6th bullet. Since the FOST states groundwater may contain chemicals because of the proximity to OU-2 plume, the Army should confirm the levels of contaminants in groundwater or address the need for a restriction in the FOST and deed which prevents extraction and consumption of groundwater.

Response: Recent and historical groundwater sampling in the vicinity of this parcel indicates that groundwater beneath the property may contain volatile organic compounds (VOCs) at 1 microgram per liter or less. Notice of hazardous substance release under CERCLA §120(h)(1) will be included in the FOST. The FOST will include a table showing the maximum VOC concentrations elsewhere in the plume and a notice of the potential presence of contaminated groundwater. Restrictions on well drilling and use of groundwater will also be included.