

**FINDING OF SUITABILITY TO TRANSFER (FOST)
VIETNAM VETERANS OF MONTEREY COUNTY PARCEL
FORMER FORT ORD, CALIFORNIA**

On the basis of the Community Environmental Response Facilitation Act (CERFA) report for Fort Ord, I have determined that the Vietnam Veterans of Monterey County (VVMC) Parcel (the Property), at former Fort Ord, California, is suitable for transfer to VVMC for administrative offices and transitional housing. The area to be assigned and transferred includes 13 buildings on approximately 19.0 acres (Disposal Polygon's L 9.1.1, L.9.1.2, L.9.2, L.9.3, Plate 1).

A determination of the environmental condition of the Property was made by the United States Army by conducting an Environmental Baseline Survey (EBS) that included reviewing existing environmental documents and making associated visual site inspections. The documents reviewed included the final Fort Ord 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. Final comments received from U.S. EPA, Region IX (15 December 1996), and California EPA DTSC (18 December 1996) on the 29 February 1996 Version 2 EBS/FOST for the McKinney Group C Parcels have been reviewed and incorporated where possible. Unresolved comments are attached. The EBS indicated that the Property is environmentally suitable for transfer to VVMC. The results of the EBS are as follows:

- Thirteen buildings (2798, T-2988, T-2990, 8720-8723, and 8736-8741) are located on the Property. The buildings were previously used as a welcome center, support services, and family housing and will be used for administrative offices (2798), warehouses (T-2988 and T-2990), and transitional housing.
- An asbestos survey conducted by the Army shows that buildings 2798, 8720 - 8723, and 8736 - 8741 contain friable asbestos containing material (ACM) with various ratings. Following is a list of the friable ratings for these buildings; building 2798, rated 5 (immediate repair, management with 6 month inspection cycle), buildings 8720, 8723, and 8741 rated 10 (long-term removal), with buildings 8721, 8722, and 8736-8741 rated 12 (management with 1 year inspection cycle). The remaining nonfriable ACM in buildings 2798, 2988, 2990, 8720 - 8723, and 8736 - 8741 is in good condition with a rating of 13 (of lowest concern) with a recommended 2 year (biannual) inspection cycle. The Army does not intend to remove or repair the ACM in these structures, but to disclose its existence and condition.
- Because all the buildings were constructed prior to 1978 (1940-1962), they are presumed to contain lead-based paint (LBP). The Army does not intend to abate the LBP presumed to be present in the Vietnam Veterans buildings within the Patton Park housing area, but to disclose its existence.
- No radon levels above 4 picocuries per liter (pCi/L) were detected on the Property during a 1990 survey at Fort Ord.
- No radiological surveys have been conducted within the Property because radiological materials were reportedly not used or stored in the buildings.
- No releases of polychlorinated biphenyl (PCB) PCB-contaminated dielectric fluids on the Property have been reported.
- Routine application of pesticides occurred around the residential areas on the former Fort Ord, based on available pesticide applications records which dates from 1985 to the present. The records show

the type of pesticide used, location and date of application, final application concentration and the name of the applicator. All pesticides were used in accordance with labeled instructions. The following is a list of the pesticides applied in residential areas at Fort Ord during this time. These pesticides are still in use today and are considered safe for use in residential or outdoor areas.

- Carbamates - methylcarbamates (Ficam, Baygon); carbaryl (Sevin): propoxur (Terminate)
 - Chloropyrifos (Dursban, Empire)
 - Combination Pesticides - Purge (diazinon, pyrethrin, piperonyl butoxide), ULD-100 and Drione (pyrethrin, piperonyl butoxide and petroleum distillate); Precore methoprene and permethrin)
 - Diazinon
 - Herbicides: glyphosate (Round-up, Rodeo); 2-4D; Amitrole; sulfometuron methyl (Oust)
 - Propetamphos (Safrotin)
 - Pyrethrum and synthetic Pyrethroids -pyrethrin; phenothrin; resmethrin: cypermethrin (Demon); cyfluthrin (Tempo)
 - Rodenticides: chlorofacinone; strychnine; brodifacoum; zinc phosphide
 - Thuricide (Dipel)
- Ordnance and explosives (OE) surveys show that adjacent to the Property there may be a potential OE location (the 75-mm Pack Howitzer Firing Area), the boundary of which is approximate. The area under OE investigation is not part of this transfer. However, because OE were used throughout the history of Fort Ord, the potential for OE to be present on the Property exists. This notice will be included in the deed.
 - No underground or aboveground storage tanks or solid waste management units are present on the Property.
 - The final CERFA report identifies the Property as CERFA disqualified parcel 4. This was based on the Property's proximity to the Fort Ord Landfills (OU 2), the Installation Restoration Program (IRP) Site 2/12 groundwater contamination plumes, and partial inclusion in IRP Site 28. Site 28 was subsequently determined to be much smaller and therefore no part of the Property was included in the site characterization activities at Site 28.
 - No groundwater monitoring wells are present on the Property; however, there are two monitoring wells immediately adjacent to the VVMC Parcel. The Property is approximately 5,000 feet from the OU 2 landfill and is at the western edge of the groundwater contamination plume associated with OU 2. Groundwater beneath buildings T-2988, T-2990, and some housing units may contain volatile organic compounds (VOCs) at concentrations of between 1 and 5 micrograms per liter. A table showing maximum VOC concentrations elsewhere in the OU2 groundwater plume is attached (Table 1). Current groundwater monitoring data indicates that the Site 2/12 groundwater plume does not extend beneath the property.

National Environmental Policy Act (NEPA) requirements for this transfer were satisfied by the analysis conducted in the June 1993 Fort Ord Disposal and Reuse Environmental Impact Statement (EIS) and the December 1993 Record of Decision (ROD).

Clean Air Act General Conformity Rule requirements for this transfer were satisfied by a Record of Non-Applicability based upon an exemption for property transfers where the proposed action is a transfer of ownership, interest and title in the land, facilities, and associated real and personal property.

On the basis of the above results, certain terms, conditions, reservations, restrictions, and notifications are required. Disclosure of conditions and use restrictions are described below and will be included in the deed.

NOTICE OF THE PRESENCE OF ASBESTOS

- A. The Grantee is hereby informed and does acknowledge that friable and nonfriable asbestos containing materials (ACM) have been found on the Property, as described in the ATC Environmental Inc. (ATC) report, *Asbestos Survey Report for U.S. Army Corps of Engineers, Abrams Park, Fort Ord Installation, Fort Ord, California*, dated October 21, 1994.
- B. The Grantee covenants and agrees that its use and occupancy of the Property will be in compliance 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, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos on the Property described in this transfer, 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

Every purchaser of any interest in residential real property on which a residential dwelling was built prior to 1978 (target housing) is notified that such property may present exposure to lead from lead-based paint that may place young children at risk of developing lead poisoning. Lead poisoning in young children may produce permanent neurological damage including learning disabilities, reduced intelligence quotient, behavioral problems and impaired memory. Lead poisoning also poses particular risk to pregnant women. The seller of any interest in target housing is required to provide the buyer with any information on lead-based paint hazards from risk assessments or inspections in the seller's possession and notify the buyer of any known lead-based paint hazards. A risk assessment or inspection for possible lead-based paint hazards is recommended prior to purchase. "Target housing" means any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing) or any 0-bedroom dwelling.

Buildings constructed prior to 1978 are assumed to contain lead-based paint. Buildings constructed after 1977 are assumed to be free of lead-based paint. The Grantee hereby acknowledges receipt of the federally required lead-hazard pamphlet.

The Grantee acknowledges that it has received the opportunity to conduct a risk assessment or inspection for the presence of lead-based paint and/or lead-based paint hazards as required by law or regulations.

The Grantee and its successors shall not permit the use of any such structure for residential habitation unless the Grantee has abated the hazards of lead-based paint 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 6 years of age such as a child care center, elementary school, or playground.

NOTICE OF THE PRESENCE OF CONTAMINATED GROUNDWATER

The groundwater beneath the property is contaminated with volatile organic compounds (VOCs), primarily trichloroethane (TCE). The maximum estimated TCE concentration in the groundwater beneath the Property is less than 5 micrograms per liter. This notice is provided pursuant to CERCLA Section (§) 120(h)(1) and (3). A pump-and-treat groundwater remediation system is in place and shown to be operating effectively. Drilling of water wells or use or access to groundwater beneath the Property is prohibited, and will be recorded in the deed.

Without the expressed written consent of the Grantor in each case first obtained, neither the Grantee, its successors or assigns, nor any other person or entity acting for or on behalf of the Grantee, its successors or assigns, shall interfere with any response action being taken on the Property by or on behalf of the Grantor, or interrupt, relocate, or otherwise interfere with any remediation system now or in the future located on, over, through, or across any portion of the Property.

NOTICE OF THE POTENTIAL FOR THE PRESENCE OF ORDNANCE AND EXPLOSIVES

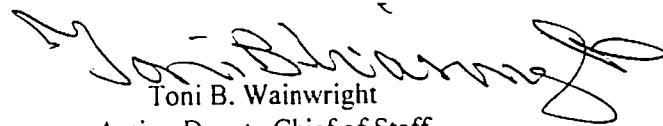
Ordnance and explosives (OE) investigations indicate that OE is not likely on this Property. However, because this is a former military installation with a history of OE use there is a potential for OE to be present on the property. In the event Grantee, its successors, and assigns, should discover any ordnance on the Property, it shall not attempt to remove or destroy it, but shall immediately notify the local Police Department and the Directorate of Law Enforcement at the Presidio of Monterey. Competent U.S. Army Explosive Ordnance personnel will be dispatched promptly to dispose of such ordnance properly at no expense to the Grantee.

Comments received from U.S. EPA Region IX and California EPA DTSC on the Version 1 FOST were reviewed and incorporated where possible into this Version 2 FOST. All comments were resolved with the exception of two, one concerning certain language regarding asbestos indemnification language and one regarding lead-based paint. They are attached as unresolved comments.

On the basis of the above information, I conclude that the Vietnam Veterans Monterey County Parcel for the McKinney Homeless Act Group C Parcel, buildings 2798, T-2988, T-2990, 8720-8723, and 8736-8741 should be assigned Department of Defense (DoD) Environmental Condition Category 3 (areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response) and is transferable under CERCLA § 120(h)(3). The deed for this transaction will contain:

- The covenant under CERCLA § 120 (h)(3)(B)(i) warranting that all remedial action under CERCLA 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) warranting that any response action under CERCLA or corrective action found to be necessary after the date of transfer shall be conducted by the United States.
- The covenant under CERCLA § 120 (h)(3)(C) granting the United States access to the Property in any case in which response action or corrective action is found to be necessary after the date of transfer.

12 JUN 1997



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

**UNRESOLVED AGENCY COMMENT
MCKINNEY GROUP C EBS/FOSTS**

US EPA 15 December 1995 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.

Army Response:

Army believes that the standard Army indemnification language is legally sufficient.

U.S. EPA Comment:

Based on the fact that the buildings were constructed before 1978, at a time when lead-based paint was commonly used on the exterior of such structures, lead from lead-based paint may be present in the surrounding soils. The Army, however, has declined to conduct soil sampling to determine whether such soils present a risk to human health and the environment as requested by EPA. For those areas that are being transferred pursuant to section 120(h)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) EPA believes that the Army would be unable to include a covenant in the deed of transfer warranting that "all remedial action necessary to protect human health and the environment has been taken".

CAL EPA Comment:

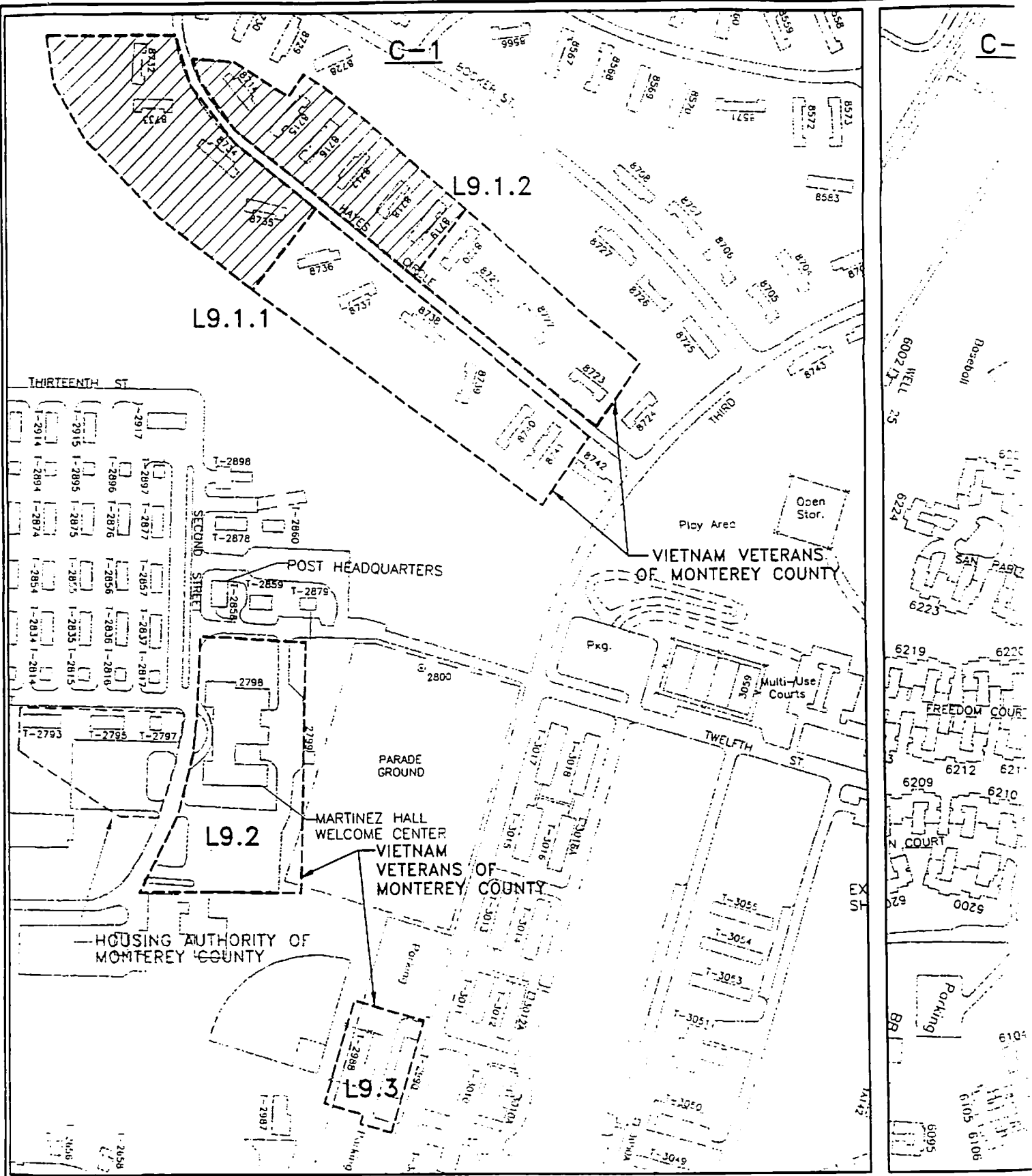
The Army has declined to conduct soil sampling to determine whether soils surrounding Buildings (constructed prior to 1978) contain lead from lead-based paint at levels which may pose a threat to human health and the environment. Therefore, Cal-EPA is unable determine whether all remedial actions have been taken with respect to potential releases of lead from Lead-based-paint.

Army Response:

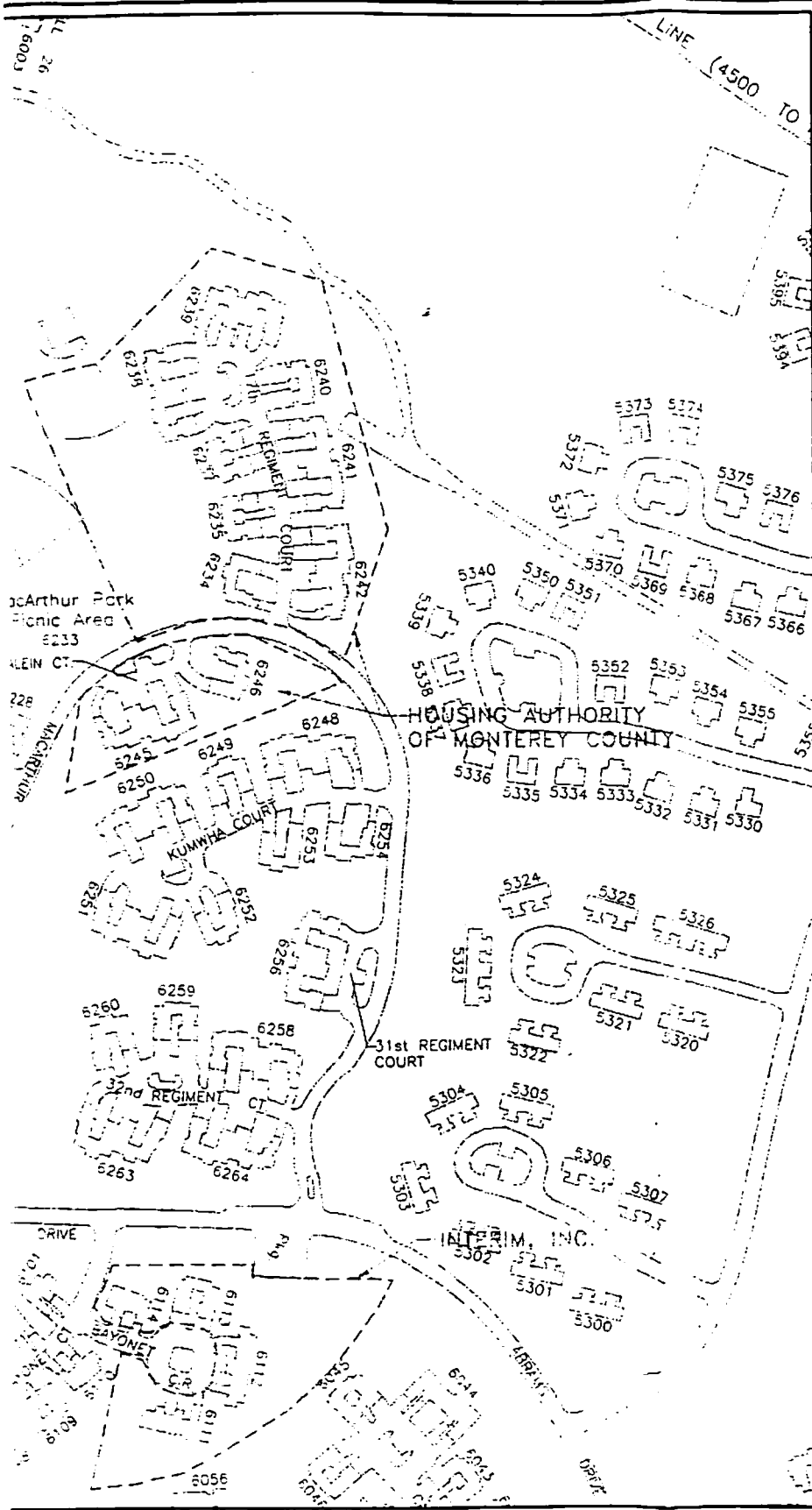
Army believes that the risk from lead-based paint in the soil around these buildings is negligible because the buildings have been well maintained. Additionally, the Army does not agree that lead-based paint in soil is governed under CERCLA.

**Table 1. Maximum Chemical Concentration by Aquifer Zone
OU 2 Groundwater Plume
Former Fort Ord, California**


Aquifer Zone	Substance	Concentration (ug/L)
Upper Aquifer Zone	1,1,1-trichloroethane	18
	1,1-dichloroethene	33
	1,1-dichloroethene	14
	1,2-dichlorobenzene	16
	1,2-dichloroethane	3.7
	1,2-dichloroethene (total)	41
	1,2-dichloropropane	2.5
	1,4-dichlorobenzene	9
	bromodichloromethane	0.6
	chlorobenzene	2.8
	chloroform	3.7
	cis-1,2-dichloroethane	40
	dibromochloromethane	0.6
	Freon 113	9.1
	tetrachloroethene	20
	trans-1,2-dichloroethane	0.6
	trichloroethene	21
	vinyl chloride	1.7
	180-Foot Aquifer Zone	1,1,1-trichloroethane
1,1-dichloroethane		1.6
1,2-dichlorobenzene		0.9
1,2-dichloroethene(total)		15
1,2-dichloropropane		1.1
chloroform		3.1
cis-1,2-dichloroethene		15
tetrachloroethene		1.6
trichloroethene		43
400-Foot Aquifer Zone	No Detection's	
Salinas Valley Aquiclude	1,2-dichlorobenzene	1.9
	1,2-dichloroethene (total)	0.5
	cis-1,2-dichloroethene	0.5
	tetrachloroethene	1.0
	trichloroethene	1.9

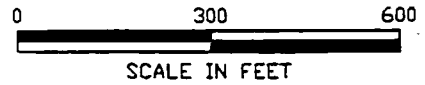


PROPER BOUNDARIES INDICATED ARE APPROXIMATE AND ARE NOT INTENDED TO REPRESENT THE LEGAL DESCRIPTION OF THE PARCEL(S).

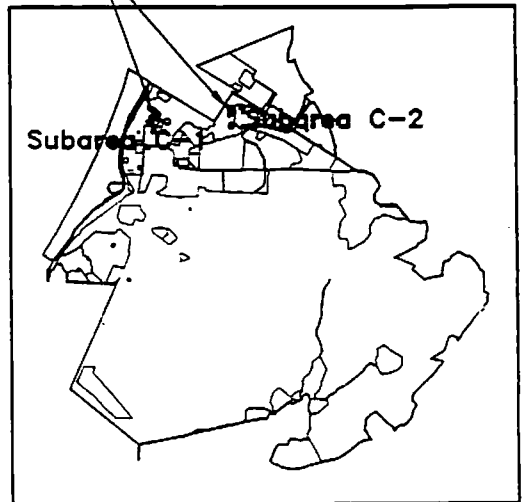


EXPLANATION

- PARCEL BOUNDARY
- L9.1.1 PARCEL NUMBER
-  EXCLUDED FROM PHASE I TRANSFER



McKINNEY HOMELESS ACT GROUP C PARCELS



KEY MAP



Harding Lawson Associates
Engineering and
Environmental Services

Parcel Map
McKinney Homeless Act
Group C Parcels
Environmental Baseline Survey
Former Fort Ord, California

PLATE

1

DRAWN CN JOB NUMBER 25894 0017616

APPROVED *JF*

DATE 2/95

REVISED DATE 10/95

25894.0333 - 300.0
19970306.1101

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 Vietnam Veterans . This Action Covers Activities Associated with Land Conveyance Between the U.S. Army and Vietnam Veterans .

1. Scope Definition: The Department of the Army is granting parcels of land located at the former Fort Ord, California for use by Vietnam Veterans . Subject parcel requested by Vietnam Veterans was formerly utilized by the U.S. Army for family housing.
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. Intended future reuse of subject parcel by grantee is for residential purposes .
4. In accordance with Section 51.853 of the General Conformity Rule, subject Federal action is exempt from conformity requirements where proposed action is a transfer of ownership, interest and title in the land, facilities, and associated real and personal property.
5. Any utilization of subject parcel by the grantee influencing facility emissions not identified in the State Implementation Plan, has neither been disclosed to Army Environmental personnel, nor considered in this determination.



CHRISTINE LAWSON
Air Pollution Environmental Coordinator
Directorate Environmental and Natural
Resources Management

OTH-091

CalEPA

Department of
Toxic Substances
Control

400 P Street,
4th Floor
P.O. Box 806
Sacramento, CA
95812-0806

January 9, 1997



Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Mr. Bill Raines
Department of the Army
Commander, DLIFLC and POM (Fort Ord)
ATTN: ATZP-EP
Presidio of Monterey, California 93944-5006

REVIEW OF FINAL VERSION OF THE FINDING OF SUITABILITY TO
TRANSFER (FOST) DOCUMENT (VERSION 2) FOR VIETNAM VETERANS OF
MONTEREY COUNTY PARCEL DATED DECEMBER 20, 1996, FORMER
FORT ORD, CALIFORNIA.

Dear Mr. Raines:

Thank you for the opportunity to review the draft final
version of the FOST for Vietnam Veterans of Monterey County
Parcel. Please find our comments below:

1. In the December 11, 1996 Base Realignment and
Closure Cleanup Team meeting, the Army mentioned
that a "Notice of Potential Ordnance" is included
in all deeds since the nature of former military
activities at Fort Ord presents the potential for
the discovery of ordnance and explosives (OE) for
any property transferred. We request that the
FOSTs state that this notice be included in the
deed. Further, we suggest the FOST include the OE
notice language anticipated for the deed similar
to what is done for other types of notices
described in the FOST (i.e. contaminated
groundwater, etc.). At a minimum, the OE notice
should be included when OE areas have been
identified in close proximity to parcels to be
transferred.



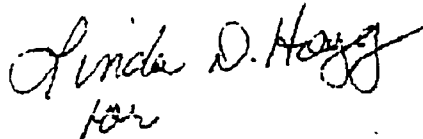
Mr. Bill Raines
January 9, 1997
Page 2

2. Second paragraph of FOST. Please reference the Version 2 Environmental Baseline Survey dated February 2, 1996 that was prepared for this parcel.

3. Lead-based paint (LBP). The Army has declined to conduct soil sampling to determine whether the soil surrounding buildings constructed prior to 1978 contain lead from LBP at levels which may pose a threat to human health and the environment. Therefore, the Department of Toxic Substance Control (DTSC) is unable to determine whether all remedial actions have been taken with respect to potential release of lead from LBP. The Army has attached DTSC's unresolved comment to the FOST as required by Department of Defense FOST policy. In addition, the Notice of the Presence of Lead-Containing Paint states that the "grantee.... should abate and eliminate LBP by treating any defective LBP surface...". We request this notice also acknowledge the potential for abating soil lead hazards in residential areas in accordance with applicable laws and regulations.

If you have any questions regarding these comments, please contact me at (916) 323-3466.

Sincerely,



for
Theresa McGarry
Environmental Assessment
and Reuse Specialist
Base Closure and Conversion
Office of Military Facilities

cc: See next page.

Mr. Bill Raines
January 9, 1997
Page 3

cc: Ms. Leda Tan
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Mr. Hector Hernandez
California Regional Water Quality Control Board
Central Coast Region
81 Higuera Street, Suite 200
San Luis Obispo, California 93401-5414

Ms. Gail Youngblood
BRAC Coordinator
Department of the Army
Commander, DLIFC and POM (Fort Ord)
ATTN: ATZP-EP
Presidio of Monterey, California 93944-5006

Mr. Dan McMindes
U.S. Army Corps of Engineers
1325 J Street
Sacramento, California 95814

Mr. Steven Farley
Harding Lawson Associates
P.O. Box 6107
Novato, California 94948



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-2901

January 4, 1996

Raymond Fatz
Acting Deputy Assistant Secretary of the Army
(Environment, Safety and Occupational Health)
Installations Logistics and Environment
110 Army Pentagon
Washington, D.C. 20310-0110

Re: Fort Ord - CERCLA §120(h)(3) Transfer of Property
Overlying OU-2 (Landfills) Groundwater Plume

Dear Mr. Fatz:

The U.S. Environmental Protection Agency, Region IX (EPA) received on December 8, 1995, a document entitled "Technical Memorandum: Demonstration of Groundwater Plume Capture, Operable Unit (OU-2) Groundwater Remedy, Fort Ord, California" (Technical Memorandum), dated December 7, 1995 and prepared by IT Corporation on behalf of the Army. The purpose of the memorandum is to demonstrate to EPA that the OU-2 groundwater remedy is constructed and operating properly and successfully for purposes of satisfying property transfer requirements under §120(h)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9620.

When entering into a deed for transfer under §120(h)(3) of CERCLA, the Army is required to include in such deed a covenant warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substance remaining on the property has been taken before the date of transfer, and that any additional remedial action found to be necessary after the date of the transfer shall be conducted by the United States. In the case of a contaminated groundwater plume such as OU-2, the statute provides that the covenant can be given if the construction and installation of an approved remedial design has been completed, and the remedy has been demonstrated to the EPA Administrator to be operating properly and successfully. The ongoing requirement for pumping and treating, or other operation and maintenance, after the remedy has been demonstrated to be operating properly and successfully does not preclude the transfer of the property.

EPA and the Army have established the following conditions with respect to the Fort Ord OU-2 groundwater remedy for demonstrating compliance with §120(h)(3) of CERCLA:

- 1) Construction of an approved remedial design will be considered complete when:
 - a) Construction completed per approved design for the 1) extraction well system, 2) conveyance (piping) system, 3) treatment system, and 4) discharge system
 - b) Army notifies EPA that construction is complete
- 2) Remedy will be considered to be operating properly and successfully when:
 - a) The entire system is activated and is pumping, treating, and discharging per approved design
 - b) Army submits a technical memorandum to EPA describing the results of the following activities:
 - 1) Army collects groundwater elevation data from monitoring well network to demonstrate an inward gradient of the contaminated plume in the Upper and 180-foot aquifers toward the extraction wells.
 - 2) Army conducts sampling at influent and effluent of treatment system to demonstrate that system is meeting discharge requirements.

The Army has demonstrated that the conditions described above have been met based on a brief period of operation and an initial, limited evaluation of performance. However, the performance of the pumping system, particularly in the eastern portion of the 180-foot aquifer, indicates the need for further refinement. As the pump and treat system continues to operate, analyses of plume capture will also continue, and modifications to the existing design may be necessary to increase the effectiveness of the remedy in order to ensure that the remedy will meet the goals and standards established in the OU-2 Record of Decision (ROD) and Explanation of Significant Differences (ESD). These adjustments are an expected part of groundwater remedies, and are described in the ROD. Under the terms of the ROD, the Army remains responsible for continuing evaluation of the remedy and for any modifications necessary to achieve the requirements of the ROD (and ESD).

EPA is comfortable with an approach utilizing the above conditions to satisfy CERCLA §120(h) (3) at Fort Ord because of the following:

- 1) **Enforceability** - Under the Federal Facility Agreement (FFA) for Fort Ord, entered into by EPA, the State of California, and the Army, the Army has committed to implement the OU-2 groundwater cleanup in accordance with the OU-2 ROD (and ESD), and is obligated to perform any necessary post-land transfer cleanup.
- 2) **Contract Flexibility** - EPA understands that the Army's contract provides for the performance of all work necessary to meet the ROD (and ESD). Thus modifications to the pump and treat system can be easily implemented.
- 3) **Risk to human health and the environment** - There are no current or identified future users of the groundwater, nor does the groundwater contamination impact any environmental receptors.

EPA has reviewed the Technical Memorandum; the OU-2 ROD signed on August 23, 1994, which includes Final Upper Aquifer and Interim 180-foot Aquifer cleanup standards for treatment and discharge which must be achieved by the remedy; the ESD to the OU-2 ROD, signed on August 23, 1995, which specifies Final 180-foot Aquifer cleanup standards; the Design Analysis for the OU-2 Groundwater Remedy ("100% Design"), approved on December 7, 1995; and various OU-2 related documents including remedial investigation/feasibility study reports, groundwater monitoring reports, and the remedial design/remedial action work plans, operation and maintenance plan, and sampling and analysis plan (collectively, "Documentation").

Without independent investigation or verification of certain information contained in the Documentation, the undersigned has evaluated the Army's demonstration and has determined that an approved OU-2 groundwater remedy is operating properly and successfully. The Army continues to be responsible for long-term pumping and treating as well as operation and maintenance of the system until conditions of the FFA, the ROD and the ESD have been satisfied. The review of the Documentation was completed pursuant to CERCLA §120(h) (3) and the sole purpose of this letter is to satisfy the requirements of that provision. This letter shall not modify any obligation, right or authority existing under the Fort Ord FFA, and all amendments thereto, entered into by EPA, the State of California, and the Army, including the Army's obligation to meet the requirements of the OU-2 ROD and ESD. The undersigned expressly reserves all rights and authorities relating to information not contained in the Documentation, whether such

information was known as of this date, or is discovered in the future.

The undersigned recommends that this document be referenced in Finding of Suitability to Transfer documents, and that it be made available to the public. If you have any questions, please call John Chesnutt, EPA Remedial Project Manager for the Fort Ord Site, at (415) 744-2393.

Sincerely,



Julia Anderson, Director
Federal Facilities Cleanup Office

cc: Congressman Sam Farr
David Wang, California Department of Toxic Substances Control
Gail Youngblood, Fort Ord BRAC Environmental Coordinator
Bob Carr, EPA-HQ

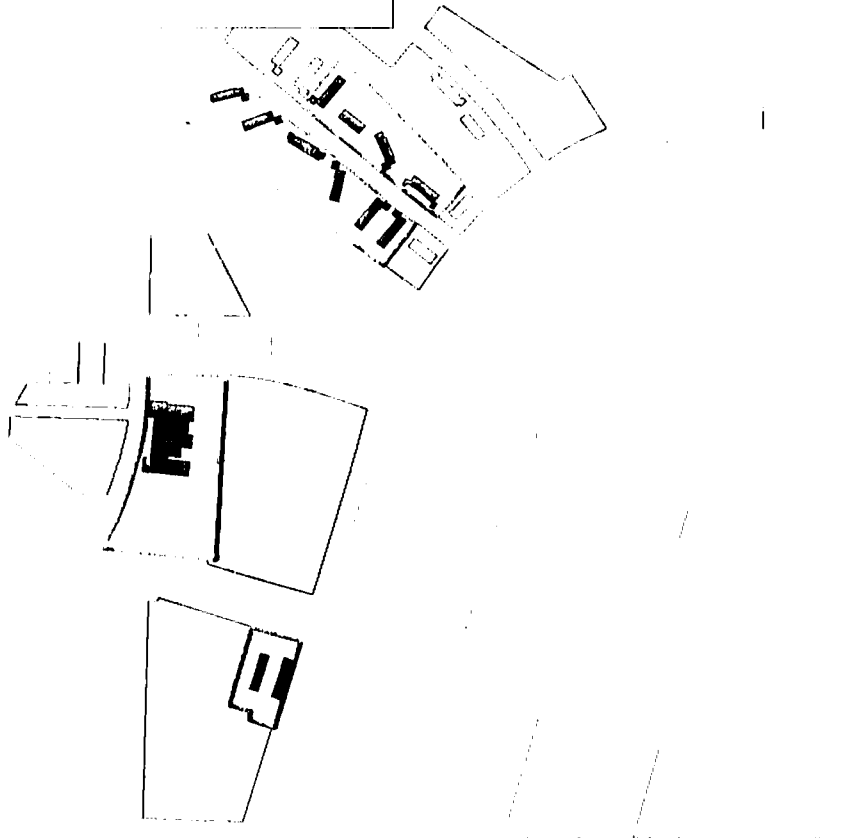
Former Ft. Ord

Vietnam Veterans of Monterey County



Parcel Locator Map

Vietnam Veterans
of Monterey County



No Buildings: 13

No. Sq. Ft.: 70,950

No. Acres: 19.0

DoD Category: 3

Reuse: Administrative Use
and Transitional Housing

Recipient: Vietnam Veterans of
Monterey County



400 0 400 800 1200 Feet



FOST/FOSL COMPLETION CHECK LIST

TYPE: FOST				
NAME: VIETNAM VETERANS OF MONTEREY COUNTY				
INITIAL REVIEW		COMPLETED		
REGULATOR REVIEW		COMPLETED		
FINAL REVIEW		6/12/97		
IDENTIFY PROPERTY		13 BLDGS / 19.0 ACR		
IDENTIFY DOD CATEGORY		CAT 3		
IDENTIFY CONTAMINANTS		ASB/LBP / SEE TABLE 1		
IDENTIFY REMEDIATION STANDARDS				
IDENTIFY REMEDIATION		PUMP & TREAT		
IDENTIFY REUSE		TRANS. HOUSING		
IDENTIFY RESTRICTIONS		ASB/LBP / NO WELLS		
EPA LETTER ATTACHED		DU-2	4 JAN 96	
STATE LETTER ATTACHED			9 JAN 97	
UNRESOLVED COMMENTS ATTACHED			ASB / LBP	
SATISFY NEPA REQUIREMENTS			EIS	
SATISFY CLEAN AIR ACT REQS			BONA	
COORDINATION		PHONE	NAME	DATE
BRACO	ATCS-OR	727-3849	MR TAYLOR	5/16-21/97
ENVR	ATBO-SE	727-2299	MR AIKEN	6/11/97
REAL ESTATE	ATBO-GP	727-2569	MR BLANCHARD	5/20/97
LEGAL	ATJA	727-2773	MAJ EGAN	5/20/97
PAO	ATPA	727-3506	NOTIFIED	6/12/97