

APPENDIX A
AGENCY COMMENTS TO DRAFT EBS
AND RESPONSES

Response to USEPA Comments (June 3, 1994)
Draft Environmental Baseline Survey
Fritzsche Army Airfield (FAAF) Parcel
Fort Ord, California

Note: Please refer to the above-referenced comments (Appendix A) for the complete text of the abbreviated comments listed below.

General Comments

Comment 1: Categories of Property to be Transferred:

Response 1: A map (Plate 9) has been included in Version 2 of the FAAF EBS identifying the areas of Phase I that are being transferred under CERCLA §120(h)(3) and §120(h)(4) respectively. Plate 9 shows the following information supporting transfer of Phase I of FAAF:

- FAAF Parcel Boundary
- Phase I
- Property Transferable now under CERCLA §120(h)(4)
- Property Transferable now under CERCLA §120(h)(3)
- Property Not Transferable now (NPL or OEW sites)

The information on Plate 9 is sufficient to identify the authority under which areas of Phase I are being transferred.

Comment 2: The Draft EBS does not discuss the use of pesticides:

Response 2: After being placed on the NPL, basewide investigations were undertaken to assess areas on the installation where above normal pesticide use occurred. Areas of above-normal pesticide use identified in the basewide investigation are being investigated under the NPL program, including both documentation review and field sampling. There are three areas that are being investigated for possible above normal pesticide use. These include Site 15, Site 24, and Site 33. None of these sites is located within the FAAF Parcel and they are not being proposed for transfer at this time. The EBS has been revised to reflect this information.

Comment 3: NPL Site Terminology:

Response 3: The use of the terms 'NPL site' and 'Non-NPL site' has been a common practice for several years and are used to distinguish sites for which an investigation is being conducted under CERCLA from those areas being investigated under separate programs, such as those in the underground storage tanks program. Three types of NPL sites, RI/FS sites, Interim Action Sites, and No Action Sites, have been identified in coordination with the regulatory agencies. Because these terms, including the use of the NPL site terminology, have been in common use for some time and help distinguish the various investigative activities being conducted at Fort Ord, no changes to the document are warranted.

Specific comments

Comment 4: Page 13 (also pp. vii, 15, 20, Table 10), References to NPL Sites:

Response 4: See response to General Comment 3 above.

Comment 5: Page 17, EBS Guidance:

Response 5: The most recent guidance received from the Department of Defense is dated June 1, 1994, and was received after the preparation of the draft EBS for FAAF. This most recent guidance was reviewed and used when preparing the Version 2 EBS for FAAF.

Comment 6: Page 23, Reference to 6 NPL Sites:

Response 6: See response to General Comment 3 above.

Comment 7: Page 27, Asbestos Surveys:

Response 7: Asbestos surveys have now been completed for 43 structures on the FAAF parcel, which represents all habitable buildings on the parcel. The structures not surveyed previously may have included facilities such as flagpoles and loading docks that are not habitable buildings, but were assigned structure numbers.

Comment 8: Page 31, Summary of Lead-Based Paint Management Program:

Response 8: Because housing structures are not present on the FAAF parcel, sampling of defective lead-based paint surfaces was not necessary. The suspected presence of LBP in 26 non-housing buildings on the FAAF parcel is based on their date of construction (1978 or pre-1978). The exteriors of buildings were not surveyed for LBP.

Comment 9: Page 35, Decommissioning of Buildings

Response 9: Seven buildings on the FAAF parcel were surveyed and sampled for radioactive materials. No radiological health hazards were identified and the seven buildings were recommended for radiological decommissioning.

Comment 10: Page 41, Spills of waste oil onto fuel pods:

Response 10: There are no motor pool areas on the FAAF parcel and there are no reported spills of waste oil involving the transfer of waste oil into fuel pods used as temporary ASTs.

Comment 11: Page 43, UST Program

Response 11: The UST program status for the 11 known tanks at the FAAF parcel has been updated for Version 2 of the EBS. Two ASTs have been identified on the FAAF parcel and their status is reported. The FOST reflects the known status of the tanks.

Comment 12: Page 44, SWMUs Program

Response 12: The 1993 update on SWMUs presented in the FAAF EBS is the most current information available. No evidence of environmental release was present at any of the six SWMUs present at FAAF.

Comment 13: Pages 48 and 49, CERFA Report and Agency Concurrence

Response 13: The Version 2 EBS has been revised to include reference to maps from the final CERFA Report, and shows the areas where EPA concurred on the identification of CERFA-uncontaminated parcels.

Comment 14: Page 49, Reference to CERCLA §120(h)(3)

Response 14: Uncontaminated property is to be transferred under CERCLA §120(h)(4) not (3). Also, see response to General Comment 1 above.

Comment 15: Page 50, CERFA with Qualifiers Parcels

Response 15: The CERFA with Qualifiers category was developed by the Department of the Army for the CERFA Program as one of four categories. The CERFA report is considered the base report for all EBS-related activities, and parcel-specific EBSs incorporate information from the final CERFA FAAF report. Plate 9 presents the requested information on which portions of the parcel are transferable under CERCLA §120(h)(3) or (4).

Comment 16: Page 50, CERCLA §120(h)(3) vs. §120(h)(4)

Response 16: See response to General Comment 1 above. The text of the EBS has been revised to reflect current DoD guidance and to clarify under which section of CERCLA property transfers will take place.

Comment 17: Page 52 and Table 9, No Further Action

Response 17: The term "no further action" has been changed to "no action." A note has been added to Table 9 indicating that categories of NPL sites may change as additional information becomes available.

Comment 18: Page 52, 53, 56, NPL Sites

Response 18: See response to General Comment 3 above.

Comment 19: Page 60, Asbestos Surveys

Response 19: The text will be changed to reflect that 43 buildings have been surveyed for asbestos. See response to Comment 7 above.

Comment 20: Page 61, CERFA Parcels

Response 20: The Version 2 EBS reflects the information from the final CERFA report.

Comment 21: Page 61, SWMUs Program

Response 21: The Department of the Army is investigating all SWMUs at Fort Ord for inclusion in the basewide RI/FS report under RCRA/CERCLA interface requirements. No additional SWMUs have been identified, nor does the Army expect to find additional SWMUs as a result of the investigation.

Comment 22&23: Page 62, NPL Sites

Response 22&23: See response to General Comment 3 above.

Comment 24: Page 62, Health-Related Conditions

Response 24: The specific health-related environmental conditions known to exist on the FAAF parcel are presented in the EBS. Evaluation of the possible exposure pathways and health risks to individuals working in or occupying buildings associated with these conditions is beyond the scope of the EBS.

This concludes the written responses to USEPA comments on the draft EBS for the FAAF parcel.

Response to DTSC Comments (June 6, 1994)
Environmental Baseline Survey
Fritzsche Army Airfield (FAAF) Parcel
Fort Ord, California

Note: Please refer to the above-referenced comments for the text of the comments and questions responded to below.

General Comments

Comment 1: Phase 1 Property Boundaries, FOST:

Response 1: FAAF Phase I parcel boundaries were not defined at the time the draft EBS was issued in March 1994. Information in the EBS was used to define the FAAF Phase I area. The Version 2 EBS contains a map showing the boundaries of the Phase I area and the legal description of the property. The FOST also contains a map of the FAAF Phase I area.

Comment 2: Existing Environmental Conditions and Use Restrictions:

Response 2: The EBS addresses the requested environmental issues either directly or in conjunction with discussions on basewide restoration programs. Use restrictions for portions of reuse parcels will be delineated in the transfer documents (e.g., deeds) per DoD guidance and in accordance with CERCLA §120(h)(3).

Comment 3: Outstanding Survey Results:

Response 3: The EBS for FAAF presents information available at the time the EBS was prepared and represents a snap-shot of the environmental conditions, based on those available data and in accordance of DoD guidance for preparing EBSs. At the time the draft EBS for FAAF was prepared, asbestos surveys had been completed for most of the non-housing buildings. Plate 4 of the EBS for FAAF showed building-specific information about asbestos, including (1) the location of buildings for which asbestos surveys had been completed and the condition of the asbestos in those buildings and (2) the location of buildings for which asbestos surveys had not been completed as of the time the draft report was issued. The Department of the Army, through the Sacramento District COE, has conducted additional asbestos surveys for buildings not previously surveyed. Results of those surveys will be made available for review to new property owners upon completion. The Version 2 EBS will include the most current information available.

Lead-based paint surveys are currently underway at Fort Ord. Information from these surveys will be made available through the EBS process or will be made available for potential property recipient review. However, when definitive lead-based paint survey information was not available, our approach was to conservatively estimate the likelihood of the presence of lead-based paint based

on building construction information. Buildings constructed in or prior to 1978 were assumed to contain lead-based paint.

Radon surveys have been recently completed and no radon levels above 4 picocuries/liter were observed in buildings on the FAAF parcel.

Radiological surveys of seven buildings within the FAAF parcel have been completed and results are included in the Version 2 EBS.

In general, individual Memoranda of Agreements between the Army and potential property holders will include use restrictions that allow no occupation of the buildings until final survey results are available or appropriate corrective actions have been taken.

Specific Comments

Comment 4: Page vii, Executive Summary

Response 4: Current DoD FOST guidance dated June 1, 1994, states that the regulatory agencies will be provided an opportunity to review draft FOSTs prior to their being signed by the Department of the Army (DA). DoD guidance states that the Army will include the agencies in the process and will also notify them of the Army's intention to sign a FOST. In accordance with that guidance, unresolved comments from the agencies will be appended to the FOST.

Comment 5: Page 7, Section 1.6, Limitations

Response 5: In accordance with DoD guidance, an EBS is prepared prior to property transfer. The purpose of an EBS is to document the existing environmental conditions of the property and to provide for informed the DA decisions on the suitability of the property for transfer consistent with the requirements of CERCLA §120(h). In addition, the EBS aids in the Army's preparation of deed covenants, if required. The EBS was not prepared to directly support any other purpose beyond DA decision making. The EBS is placed in information repositories making it available for public review prior to property transfer. In addition, the Army is required to publish a Notice of Intent to sign a FOST that announces where a public 30-day review period may be conducted.

Comment 6: Page 15, Section 2.6, Historical Uses on Property Adjacent to Parcel

Response 6: Site investigation activities at adjacent NPL Sites 27 and 35 have been completed. Field observations and chemical analysis of samples collected at the sites suggest that subsurface soil and groundwater have not been significantly impacted by site activities. Sites 27 and 35 are considered No Action sites. The EBS has been modified to reflect their status.

Comment 7: Page 15, Section 2.6, Historical Uses on Property Adjacent to Parcel and Page 56, Potential Impacts from Adjoining Properties

Response 7: Soil remediation at OU1 is completed and groundwater remediation is ongoing. The groundwater chemical plume at OU1 does not extend onto the FAFF parcel and is not expected to do so in the future. Additional information is presented in the draft final OU1 Remediation Confirmation Study (May 3, 1994).

- Comment 8:** Page 17, Section 3.0, Approach to Conducting EBSs
- Response 8:** These sections provide a discussion of the procedures for conducting an EBS and FOST and are appropriate in this section rather than in an appendix. No changes to the report are necessary.
- Comment 9:** Page 18, Section 3.1, Records Search
- Response 9:** The Army's approach in preparing the EBS for FAAF was to review all available information, including inspection reports from federal, state, and local governments, to provide a snapshot of existing environmental conditions on the parcel. For example, Monterey County records were reviewed to identify USTs for which the county had granted closure.
- Comment 10:** Page 37, Section 4.6, PCB Management Program
- Response 10:** All transformers at Fort Ord with between 50 and 500 ppm PCBs have been removed and replaced with non-PCB transformers. According to Army records, there are no transformers with PCB levels greater than 50 ppm remaining at Fort Ord or FAAF. No reported releases of PCBs are known to have occurred on the FAAF parcel. Specific lists of transformers on the FAAF parcel and their PCB levels are not available. Visual inspection of transformers at FAAF was not performed as part of the EBS.
- Comment 11:** Page 41, Section 4.7.1 and Page 43, Section 4.7.2, Petroleum Storage Tank Management Program
- Response 11:** The 90-gallon diesel AST present on the FAAF parcel is double walled, but not contained by a berm. According to Army records no release from this AST has occurred. Another AST is present at the FAA radar facility in the north end of the FAAF parcel. This AST is double-contained and no release are known to have occurred.
- Comment 12:** Page 44, Section 4.8, SWMU Management Program
- Response 12:** Spill reports documenting specific releases over the last 2 or 3 years are internal Army documents that could not be retrieved from the files for review at the time of EBS preparation because of changes in DEH/ENRD facility, personnel, and office locations. However, according to the Army, no "reportable-quantity" spills occurred that would have regional notification of regulatory agencies. The reference in the draft EBS to "California-regulated" spills was meant to be synonymous with "reportable-quantity" spills; "California-regulated" has been deleted for clarity.
- Comment 13:** Page 47, Section 4.8.2, SWMU Program Status and EBS results
- Response 13:** The 1988 SWMU evaluation was updated in 1993; the results of the update are included in the Version 2 EBS. No evidence of environmental releases are known to have occurred from any of the six SWMUs present at FAAF. Table 7 has been modified to reflect the current in active status of the SWMUs.

- Comment 14:** Page 50, Section 4.9.1.2, CERFA Program Status:
- Response 14:** The final CERFA report was issued on April 1, 1994. Regulatory agencies (DTSC and USEPA) have provided concurrence or commented on the final CERFA report. Portions of the FAAF parcel for which the EPA has granted concurrence with the CERFA report are noted on Plate 8 of the Version 2 EBS.
- Comment 15:** Page 51, Section 4.9.2.1, Summary of RI/FS Program
- Response 15:** The text has been modified to acknowledge that the functions originally performed by the DHS are now performed by the DTSC. The Federal Facilities Agreement was signed by the DHS, the predecessor of the DTSC.
- Comment 16:** Page 53, Section 4.9.2.2, second paragraph:
- Response 16:** The word "gas" has been clarified in the text to mean "gasoline."
- Comment 17:** Pages 53-54, Section 3.9.2.2, RI/FS Program Status and EBS results
- Response 17:** The EBS text has been revised to indicate that the Interim Action Record of Decision (IAROD) was signed in March 1994, and that interim actions at one location in NPL Site 34 will be undertaken in 1995. This location (wash rack 516) is not on the FAAF parcel.
- Comment 18:** Page 53, Section 4.9.2.2, RI/FS Program Status and EBS Results and Table 9
- Response 18:** A footnote has been added to Table 9 indicating that categories of NPL sites may change as additional information becomes available.
- Comment 19:** Page 61, Section 5.0 Findings and Conclusions, SWMUs
- Response 19:** There are six inactive SWMUs on the FAAF parcel. They are listed in Table 7 and their locations are shown on Plate 6. Please see response to comment 13.
- Comment 20:** Page 61, Section 5.0 Findings and Conclusions, Radiological Surveys
- Response 20:** Radiological surveys and sampling at seven buildings at the FAAF have been completed. No radiological health hazards were identified and the buildings were recommended for radiological decommissioning.
- Comment 21:** Page 61, Section 5.0 Findings and Conclusions, USTs
- Response 21:** Monterey County Department of Health concluded that the four former USTs previously located in the FAAF parcel for which closure has been granted contain "no significant soil contamination and no further action is required at this time." Six additional USTs on the FAAF parcel are to be removed in the future and a work plan has been prepared. No removals are scheduled at this time.

- Comment 22:** Page 62, Section 5.0 Findings and Conclusions, CERFA Parcels
- Response 22:** The CERFA parcels as presented in the final CERFA report are presented on Plate 8 of the Version 2 EBS. Agency concurrence on CERFA parcels is also indicated. The areas of FAAF that the Army believes are suitable for transfer under CERCLA §120 (h)(3) or (4) are shown on Plate 9. The NPL sites are shown as not being transferrable at this time.
- Comment 23:** Table 4, Buildings with Planned Radiological Decommissioning
- Response 23:** Table 4 has been modified to include a list of the objects stored in the buildings surveyed, and the radioactive isotopes typically contained in those objects. More detailed information can be found in the referenced radiation survey reports.
- Comment 24:** Table 7, SWMUs
- Response 24:** Available information regarding the status of SWMUs is included in the text and in Table 7. A footnote listing typical contents of the motorpool container storage areas has been added to Table 7.
- Comment 25:** Plate 5, OU1 Boundary
- Response 25:** The OU1 chemical plume does not extend beneath the revised FAAF parcel boundary. Further information on the plume is presented in the Draft Final OU1 Remediation Confirmation Study (*May 3, 1994*).

This concludes the written responses to DTSC comments on the draft EBS for FAAF.

**Response to DHS Comments (April 21, 1994)
Draft Environmental Baseline Survey
Fritzsche Army Airfield (FAAF) Parcel
Fort Ord, California**

Note: Please refer to the above-referenced comments for the text of the comments and questions responded to below.

Comment 1: Radiological Survey Results

Response 1: The radiological survey program is outlined in the EBS for FAAF. The full details of what materials were used and where they were used or stored is beyond the scope of the EBS. However, Table 4 has been modified to include a list of the objects stored in the building surveyed and the radioactive isotopes typically contained in those objects. The seven buildings at FAAF were surveyed and sampled in early 1994. No radiological health hazards were identified and the buildings were recommended for radiological decommissioning and release for unrestricted use. Because the final results of these and other environmental surveys are presented in the EBS, the actual survey reports are not included. Copies of the reports are available from the Army upon request.

Comment 2: Radiological Survey Results

Response 2: See above.

This concludes the written responses to DHS comments on the draft EBS for the FAAF parcel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

June 3, 1994

Ms. Gail Youngblood, Department of the Army
H.Q., U.S. Army Garrison
Attn: AFZW-DPW-ENR (Youngblood)
Fort Ord, CA 93941

Re: EBS for University of California Santa Cruz (UCSC) Parcel
EBS for Fritzsche Army Airfield Parcel

Dear Ms. Youngblood:

EPA received the draft Environmental Baseline Survey (EBS) for the Fritzsche Army Airfield Parcel on March 14, 1994 and the University of California Santa Cruz (UCSC) Parcel on March 24, 1994. We appreciate the opportunity to review and comment on these documents.

These documents were provided to our office without a cover letter indicating Notice of Intent to Sign a FOST or FOSL. No specific review period was indicated. It is our understanding from your office that no FOST or FOSL notification accompanied the Draft EBS documents because these parcels have not yet been designated for lease or transfer.

We submit the following comments on the Draft EBSS. Our meeting with Army representatives and contractors on May 11 covered a few of our more general concerns about the Army's parcel-specific EBSS. The following comments reflect that discussion and provide comments on specific documents.

I. EBS for University of California Santa Cruz (UCSC) Parcel

GENERAL COMMENTS

Categories of Property to be Transferred --

Transfer of property at federal facilities requires the demonstration that either all necessary remedial action has been taken [CERCLA §120(h)(3)] or the parcel can be identified as "uncontaminated" [CERCLA §120(h)(4)]. The identification by the Army and the concurrence by U.S. EPA on CERFA 120(h)(4) is complete. The Army need only present such parcels, by description in the text and designation on maps, as 120(h)(4) parcels and the review process for the FOST will be streamlined. All other parcels must then satisfy the requirements of 120(h)(3) that all necessary remedial action has been taken. The EBS for

this parcel must describe and designate these areas for which 120(h)(3) should be satisfied.

Pesticides --

The Draft EBS for UCSC does not discuss the use of pesticides on the FAAF parcel and how this may impact the 120(h)(3) determination. In our concurrence on the CERFA Report for Fort Ord, EPA acknowledged that the Army identified as uncontaminated parcels where pesticides and herbicides containing hazardous substances may have been applied. Our concurrence letter recommended that the Army provide positive confirmation that residual levels, if any, do not pose a threat to human health or the environment. This recommendation applies to the review of 120(h)(3) parcels as well. We would be glad to work with you to determine any steps necessary to evaluate any pesticide or herbicide residual levels at this parcel.

NPL Site Terminology --

The term "NPL site" or "Non-NPL site" is used consistently in the text in reference to certain activity being undertaken, e.g., interim action, no action, RI/FS investigations. The use of these terms is confusing to the extent that they imply that Fort Ord consists of both NPL and non-NPL sites, when in fact the entire base is listed on the NPL. Please replace these references to "NPL sites" with a more accurate term, such as "sites which are being investigated as part of the CERCLA RI/FS at Fort Ord".

SPECIFIC COMMENTS

P. 3 "The EBS addresses ... certain substances not regulated under CERCLA, such as petroleum products, asbestos, and lead-based paint in structures." In certain instances, CERCLA regulates each of these substances.

P. 7 "Limitations": The Draft EBS designates the Army Corps of Engineers as the only intended beneficiary of the draft document. We note that the final EBS should not include such a limitation, in that the final EBS is intended to be a publicly-available document for the purpose of facilitating reuse.

p. 14 Please revise references to the NPL; see general comments.

p. 15 Sites under investigation as part of the RI/FS program: how might any of these sites affect finding of suitability for UCSC?

p. 18 Approach to Conducting Environmental Baseline Surveys: This section discusses a number of ongoing environmental programs at Fort Ord which may lead to the development of new information in the future. Of specific concern to EPA is the investigation for additional SWMUs. EPA expects that information regarding

SWMUs will be finalized prior to submission of the FOST.

p. 23 Procedures for management of hazardous materials and waste should include information about application of pesticides. See general comment above.

P. 23 Revise reference to NPL sites. [See general comments.]

p. 23-24, 28 Since not all asbestos survey information will be completed prior to the completion of the EBS, it is advisable that the final EBS indicate which areas were not surveyed at the date of publication, and when and where this final survey information will be made available to EPA and the public. In EPA's view, the presence of these materials should be disclosed to the public and to potential future users of the property.

P. 24 Revise reference to "[a]pproximately 11 NPL sites". [See general comments.]

p. 38 "So-called 3.5-inch Rocket Site": It is unclear to EPA what the Army's intentions are for further investigation at the site. On first evaluation, the site appears not to be an issue, in that it was never mentioned in the Army's CERFA report (it was found in an area that was identified as uncontaminated and EPA concurred with this decision), and information in the UC Santa Cruz EBS identifies the area as a place where one 3.5-inch rocket was recovered approximately fifteen years ago. However, if the Army judges this area to be of sufficient concern that further ordnance surveys are to be conducted at this site, then the Army should notify EPA of its plans for investigation, and EPA and the Army can discuss how to handle this area given that it already has been classified as a 120(h)(4) parcel. Please update our office with any plans for investigation in this area.

p. 44 Table 5 indicates that the County has not granted closure to one of the tanks and no reason is provided. Please explain why closure is not complete, and if possible provide an estimated date for closure. In addition, one of the 14 tanks slated for removal will be removed under a separate program; please provide an explanation.

p. 51 Please update the discussion of the CERFA process by providing information concerning EPA concurrence. Also, please revise Plate 7 reflecting only those parcels upon which EPA concurred as to 120(h)(4) requirements.

p. 51-52 As noted in the comments to the Draft CERFA Report, EPA does not agree with the use of the "CERFA with Qualifiers" category. As stated in the General Comments above, EPA believes that it will streamline the process at the FOST stage if the EBS simply identifies whether a parcel will be transferred under 120(h)(3) or (h)(4).

p. 54 Revise reference to NPL site. [See general comment]

p. 55 Interim Action sites: Sites proposed for interim action should be completed and the requisite confirmation reports signed before these areas can be transferred. It is premature to consider them suitable for transfer at this date.

p. 55 Table 9 and references to Table 9: Sites in the No Action and Interim Action category are not final until a decision document is in place. Thus, the heading "category" might be changed to "expected or proposed category".

p. 56 Since the OU 1 confirmation study is under review, and a ROD has not yet been completed, it is premature to consider this area suitable for transfer at this date.

p. 56 We recommend that lead-based paint surveys be made accessible to EPA and the public when completed.

p. 57 We recommend that radiological testing surveys be made accessible to EPA and the public when completed.

p. 58 "Eight NPL sites": please revise reference per general comment.

p. 64 Please revise reference to NPL sites per general comment.

p. 64 Regarding Interim Action sites (please spell out the acronym), the Interim Action ROD was finalized in March 1994.

p. 65 Please revise reference to NPL sites per general comment.

II. EBS for Fritzsche Army Airfield (FAAF) Parcel

p. 13 (also, pp. vii, 15, 20, Table 10) "Three NPL sites": please revise reference per general comment, e.g., "Three sites are being investigated as part of the Superfund or CERCLA RI/FS at Fort Ord ... these sites are:".

p. 17 Draft EBS guidance identified in first paragraph is not Army guidance, and as of this date it is no longer the most current guidance.

p. 23 "6 NPL sites" and subsequent references in final paragraph: please revise reference per general comment.

p. 27 The EBS states that 37 of the 39 buildings within the FAAF parcel have been surveyed for asbestos containing material (ACBM) as part of the asbestos management program at Fort Ord. Why didn't the Army survey all buildings?

p. 31 Summary of Lead-Based Paint Management Program: The text notes that "walkthroughs of all the housing units" will involve sampling defective surfaces. No housing areas exist on the FAAF parcel. Does the Army plan to conduct walk-throughs and sampling

of buildings types other than housing areas? Since lead-based paint has been identified in exterior surfaces of buildings, will defective surfaces on the exterior surfaces of the buildings also be sampled?

[p. 35 -- are any of the buildings for decommissioning located on the FAAF parcel?]

p. 41 Spills of waste oil onto fuel pods: did any of these spills occur on the FAAF parcel?

p. 43 "Although the tanks within the FAAF parcel are currently slated for removal, changes in UST program objectives may change priorities in tank removals:" When the Army issues a FOST for the FAAF parcel, it should be prepared to present an accurate report of the UST program status objectives for the parcel.

p. 44 The text seems to imply that the base should have more information available about hazardous materials and waste management. If so, this information should be obtained and included in the final EBS.

p. 48, 49 The EBS discusses CERFA issues which need to be updated, e.g. "this section discusses the CERFA program ... and the preliminary findings of the draft Fort Ord CERFA Report" [the report is final]; "Discussions are ongoing among EPA, DoD, and State regarding the vehicle for such concurrence" [concurrence was via letter]; Plate 7 presents CERFA parcels proposed by the Army, but EPA did not concur on all proposed parcels.

p. 49 The last sentence in section 4.9.1.2 incorrectly references 120(h)(3) in connection with uncontaminated property; the correct reference is 120(h)(4).

P. 50 "CERFA with Qualifiers" parcels: As noted in the comments to the Draft CERFA Report, EPA does not agree with the use of the "CERFA with Qualifiers" category. EPA believes that it will streamline the process at the FOST stage if the EBS simply identifies whether a parcel will be transferred under 120(h)(3) or (h)(4).

p. 50 In the context of the discussion of CERFA parcels, the Army states that "the areas identified as CERFA parcels within the FAAF parcel meet requirements under CERCLA 120(h)(3)." The correct citation is 120(h)(4). If this was not a typographical error and the Army intended (h)(3), then it seems that the Army may be trying to present 120(h)(4) CERFA parcels as a subset of 120(h)(3) parcels or for some other reason trying to establish that CERFA parcels "meet requirements under CERCLA 120(h)(3)." These two provisions should not be integrated because they contain different standards and require different analysis. More importantly, as transfer mechanisms, they require different types of covenants. EPA has already concurred on CERFA parcels and these are ready for transfer. The Army must now present the

remaining parcels and show that these satisfy the requirements of 120(h)(3) in order to transfer.

This section also states: "According to EPA, no other decision documents are necessary to provide a covenant in the deed warranting that necessary remedial action has been taken for these CERFA parcels, in accordance with CERCLA 120(h)(3)." Again, for the first part of this sentence to be true ("no other decision documents are necessary"), the previous sentence must refer to (h)(4) parcels, not (h)(3). In addition, the second part of this sentence is inaccurate because the covenant required for an (h)(4) transfer does not contain language regarding "necessary remedial action has been taken" because the property has already been identified as uncontaminated. The (h)(4) covenant covers only response actions found to be necessary after the date of transfer, i.e., possible future, but not present, contamination.

This section also states, "As noted above, a focus of the CERFA program is the identification of uncontaminated property, but CERFA does not directly support property transfer. The CERFA report does provide information, however, that supports the parcel-specific EBS currently in preparation at Fort Ord." While the CERFA 120(h)(4) identification is not sufficient for transfer (the Army should complete a Finding of Suitability for Transfer of these parcels which specifically delineates the parcels to be transferred), the CERFA identification does support transfer.

p. 52, Table 9: The term "no further action" should be replaced with "no action" for consistency with other documents, e.g., No Action ROD. The heading "category" should read "proposed category" because the decisions for no action sites and interim action sites have not been finalized.

p. 52 "41 Ft Ord NPL sites": please revise reference per general comment.

p. 53 "Three NPL sites" and subsequent references in first paragraph: please revise reference per general comment.

p. 56 "NPL sites": please revise reference per general comment.

p. 60 The bullet section describing findings for asbestos surveys should note that 37 out of a total of 39 structures on the FAAF parcel have been surveyed for asbestos.

p. 61 Update information on CERFA parcels.

p. 61 All SWMUs were recommended for no further action, yet the Army will be conducting a RCRA RFA/RFI equivalent program addressing the SWMUs at Fort Ord. Please explain the purpose of the RCRA RFA/RFI in this situation. Will these SWMUs be re-evaluated, and does the Army expect to find additional SWMUs?

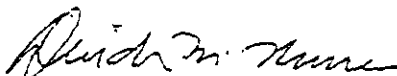
p. 62 "Several NPL sites" and subsequent references in all four paragraphs: please revise reference per general comment.

p. 62 "On the basis of available information, the requirements of CERCLA 120(h)(3) appear to have been met, outside of the NPL sites." Regarding "NPL sites", see general comment.

p. 62 "Several health-related conditions ... exist or are suspected to exist on the FAAF parcel and could pose a health risk to workers or occupants of structures." Does the reference to workers indicate individuals who are constructing areas for new use after property transfer, or long-term use of the area? What health-related environmental conditions apply to occupants of structures -- asbestos, lead-based paint, and radon only, or other kinds of conditions addressed under the IRP program? It would be helpful to be more specific.

Thank you for the opportunity to comment on this EIS. If you have any questions about these comments, please contact me at (415) 744-2387, or Deirdre Nurre, Base Closure Specialist, at (415) 744-2466.

Sincerely,



for: John Chesnutt
Remedial Project Manager
Federal Facilities Cleanup Office

cc: Ms. Mary Rose Cassa, CA DTSC Reg 2
Mr. David Eisen, CRWQCB Central Coast Reg
Mr. Harvey Don Jones, US Army COE, Sacramento

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 P STREET 4TH FLOOR

P O BOX 606

SACRAMENTO, CA 95812-0806



June 6, 1994

Mr. Joe Cochran
BRAC Environmental Coordinator (BEC)
Commander, U.S. Army Garrison and Fort Ord
Attention: AFZW-DPW-ENR
Fort Ord, California 93941-5000

Dear Mr. Cochran:

Thank you for the opportunity to review the Environmental Baseline Survey (EBS) for the Fritzsche Army Airfield (FAAF) Parcel dated March 11, 1994.

Comments from the Regional Water Quality Control Board are incorporated into our response below. Comments from the Department of Health Services, Environmental Management Branch are attached.

GENERAL COMMENTS:

We understand that the FAAF parcel may not be transferred in its entirety. Therefore, we expect to see a parcel-specific EBS/Finding of Suitability to Transfer (FOST) which provides the specific property boundaries and a legal description of the property to be transferred.

Please include in the prospective parcel-specific FOST all existing environmental conditions which pose constraints in the use of the parcel. Also, please list the specific use restrictions as they relate to the environmental constraints present at the parcel or adjacent property. At a minimum, constraints associated with the following areas should be addressed in the FOST: asbestos; polychlorinated biphenyl (PCB); lead-based paint; radon; hazardous substances stored, released or disposed; tank storage; pesticides; biomedical wastes; unexploded ordnance; relationship of transferred site to the Installation Restoration Program sites.

The EBS states that building surveys for asbestos, radon and radiological decommissioning are not all complete. These surveys must be completed before any property is considered suitable for transfer. Please clarify.

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June 6, 1994
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SPECIFIC COMMENTS:

Page VII, Executive Summary. Please modify the text to state that regulatory agencies have the opportunity to review and comment on the EBS/FOST and that any unresolved comments are attached to the FOST.

Page 7, Section 1.6., Limitations. The text states that the Department of the Army, Corps of Engineers Sacramento District is the only intended beneficiary of the draft document. The Army should make the final version of the document available to the public to facilitate the reuse of the installation.

Page 15, Section 2.6., Historical Uses on Property Adjacent to Parcel. Please modify the sentence, "Activities within the Army Reserve Motor Pool are reportedly ongoing" to clearly indicate what kinds of activity are occurring (e.g., site characterization, etc.).

Page 15, Section 2.6., Historical Uses on Property Adjacent to Parcel, and page 56, Potential Impacts from Adjoining Properties. Please provide specific information on current remediation activities for the Operable Unit (OU) 1 groundwater plume including information on the migration of the plume and its potential impact on the FAAF parcel.

Page 17, Section 3.0. Approach to Conducting Environmental Baseline Surveys. This section could be included as an appendix to the EBS.

Page 18, Section 3.1., Records Search. Please state whether existing county, state and federal inspections reports were reviewed. Review of such documents should be accomplished if any exist and relevant findings reported in the EBS.

Page 37, Polychlorinated Biphenyls Management Program. Please clarify whether any PCB transformers are located on the FAAF parcel. If so, please specify the status of the transformers (e.g. in-service) and PCB concentration. Also, please include the results of visual inspections performed for the purposes of preparing the EBS.

Page 41, Section 4.7.1.; Page 43, Section 4.7.2. The condition of the above-ground storage tanks (AST) should be determined and presented in the EBS. Also, please provide information regarding any potential environmental impacts to FAAF parcel, regulatory

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June 6, 1994
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status (i.g., permits) and future plans for removal. The condition, and regulatory status of the AST currently located on the FAAF parcel should be determined and reported in the EBS.

Page 44, Section 4.8. The text states that "Spill reports...are not currently available for review." These are Army documents so it is unclear why they are unavailable for review. Please clarify. Also, please define the term "California-regulated" spills?

Page 47, Program Status and EBS Results. The text states "None of these SWMUs had evidence of an environmental release according to the IFR and none required further action (AEHA, 1988)." Please clarify whether visual inspections of these units have been conducted since the last assessment in 1988 to determine whether there have been recent environmental releases.

Page 50, Section 4.9.1.2. Program Status and EBS Results. The text states "Plate 7 shows a number of areas within the FAAF parcel that have been categorized as uncontaminated or Community Environmental Response Facilitation Act (CERFA) Parcels, as defined by CERFA." Please revise maps to identify the CERFA parcel determinations with which the regulatory agencies concurred.

Page 51, Section 4.9.2.1., Summary of RI/FS Program: The description of the Federal Facilities Agreement (FFA) should note that the functions originally performed by Department of Health Services (DHS) are now performed by Department of Toxic Substances Control Board (DTSC).

Page 53, Section 4.9.2.2., 2nd paragraph, Program Status and EBS Results. Please use the word "gasoline" instead of "gas" to avoid confusion with soil gas.

Pages 53-54, Section 4.9.2.2., Program Status and EBS Results. The text regarding the Interim Action Record of Decision (IAROD) should indicate that the IAROD was signed on March 15, 1994. Please discuss how this signed IAROD relates to the actions planned for Site 34.

Page 53, Section 4.9.2.2., Program Status and EBS Results and page 1 of 1, Table 9, Basewide NPL Site Summary. Please note that the categories listed are for planning purposes only and that the regulatory agencies have not formally approved the actions listed under the "Category" column.

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Pg.61, Section 5.0, Findings and Conclusions. The text states that six former or existing Solid Waste Management Unit (SWMUs) are located on the FAAF parcel. The number of SWMUs currently located on the parcel should be confirmed and identified on the map and in the text.

Page 61, Section 5.0., Findings and Conclusions. The EBS states that "Radiological decommissioning is expected to be conducted for seven buildings in the FAAF parcel" and that "groundwater and air samples for radiological testing are being collected at locations within or near the FAAF parcel." We expect the decommissioning and testing will be completed and the results reported in the final EBS/FOST before a transfer takes place.

Page 61, Section 5.0., Findings and Conclusions. The EBS states that the county has granted closure to three of the nine USTs on the FAAF parcel. Please clarify whether these were "clean" closure certifications by the county. Also, the text states the remaining six USTs are slated for removal. Please clarify whether these have been investigated for contamination. Also, please specify what time frame is expected for tank removals.

Page 62, Section 5.0., Findings and Conclusions. Please specify whether the 500 acres designated as CERFA on the FAAF parcel received regulatory concurrence. It would be helpful if the CERFA areas were clearly delineated on the parcel map.

Page 62. The EBS concluded that the entire Fritzsche parcel could not currently be transferred by deed because the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h)(3), has not been satisfied. However, the EBS concluded that "the requirements of CERCLA Section 120(h)(3), appear to have been met on the FAAF parcel, outside of the NPL sites." Please identify on the map, the area outside of the National Priorities List (NPL) Sites which the Army believes does meet the requirements of 120(h)(3). Please note that regulatory agencies must agree that these areas meet the requirements of 120(h)(3).

Table 4. Buildings with Planned Radiological Decommissioning. We recommend that the Army include a column in Table 4 which shows the radioactive materials used in each building. In addition, please include in the text a discussion of current and former activities conducted in these buildings.

Table 7. Please specify whether these SWMUs are active or inactive and include waste type and dates of operation.

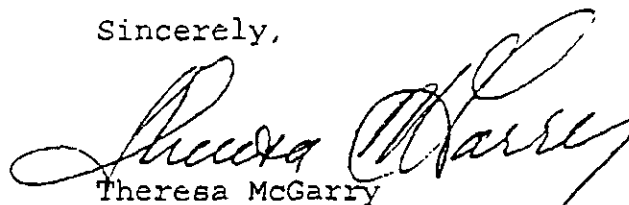
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Mr. Joe Cochran
June 6, 1994
Page Five

Plate 5. This map reflects the boundaries of the OU 1 plume which appears to extend beneath a small portion of the FAAF parcel. Please specify the data used to delineate the boundary for the OU 1 plume.

If you would like to discuss these comments any further, please do not hesitate to call me at (916) 255-2023.

Sincerely,



Theresa McGarry
Environmental Assessment and
Reuse Specialist

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

Mr. John Chestnutt
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Mr. Rufus Howell
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Sacramento, California 94234-7320

Mr. Harvey Jones
Department of the Army
Corps of Engineers
Sacramento District
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Sacramento, California 95814-2922

Mr. Stephen Farley
Harding Lawson Associates
Engineering and Environmental Services
105 Digital Drive
P.O. Box 6107
Novato, California 94948

HITCH

Memorandum

Date : April 21, 1994

o : John Adams, Chief
DOD/DOE Unit
Division of Clean Water Programs
State Water Resources Control Board
2014 T Street, Suite 130
P.O. Box 944212
Sacramento, CA 94244-2120

om : Environmental Management Branch
Drinking Water and Environmental
Management Division
P.O. Box 942732
Sacramento, CA 94234-7320

subject : Comments on Draft Environmental Baseline Survey for Fritzsche Army
Airfield Parcel, Fort Ord, California

The following comments are provided in support of the Interagency Agreement between the State Water Resources Control Board and the Department of Health Services.

1. The draft report indicates that the radiological survey program is being performed in accordance with a memorandum titled "Base Closure Actions-Radiological Surveys; Trip Report of Mr. John Manfre to Fort Ord, CA 14-16 Sep 93", and lists the major points included in the memorandum. The memorandum itself is not included as an attachment to the draft report, however, which makes it impossible to evaluate the program. In addition, the draft report refers to a memorandum titled "Revised List of Buildings at Fort Ord Recommended for Radiological Decommissioning", which identifies seven buildings for decommissioning work. The draft report lists the seven buildings but doesn't include a description of the current and former activities at buildings or the work that needs to be performed. For example, DHS is aware of radioactive materials licenses the Army held for certain devices used on its helicopters. How was this material handled or disposed of? Was this material handled in one of the seven buildings slated for decommissioning?

Without more specific information on how radiological hazards were identified it is impossible to comment meaningfully on the radiological cleanup activities at Fort Ord. DHS requests copies of the above mentioned memoranda for review, along with any other documentation on the process used for identifying parcels where radioactive materials are a concern. These documents should be appended to the Final Baseline Survey Report.

2. The report states that radiological decommissioning activities began in January 1994 and will be completed in April 1994, but gave

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no indication of what had been done to date. Since these activities should be completed in the near future, DHS requests a copy of the report on decommissioning activities in order to evaluate their effectiveness. Again, this document should be appended to the Final Baseline Survey Report.

If you have any questions regarding these issues please call me at (916) 324-7967.



Carl Lischeske, P.E.
Senior Sanitary Engineer

cc: Rufus Howell, DHS
Leslie Laudon, SWRCB
David Eisen, RWQCB-Region 3
Jennifer Smith, DTSC