

APPENDIX B

**FINDING FO SUITABILITY TO TRANSFER (FOST)
MAIN GARRISON PARCELS, CERCLA 120(h)(3), DoD CATEGORY 4 FOST
FORMER FORT ORD, CALIFORNIA**

Parcels E2b1, E2c.1, E2c.2, E2c.3, E2e, E2c.4, L12.2.2, L12.2.3, S1.4, and S1.5.1

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Parcels E2b.1, E2c.1, E2c.2, E2c.3, E2e, E2c.4, L12.2.2, L12.2.3, S1.4, and S1.5.1

On the basis of the Environmental Baseline Survey (EBS) for the Main Garrison Parcels, I have determined that E2b.1, E2c.1, E2c.2, E2c.3, E2e, L12.2.2, L12.2.3, and S1.4 and portions of Parcels E2c.4 and S1.5.1 (the Property), at former Fort Ord, California, are suitable for transfer. The area to be assigned and transferred includes Parcels E2b.1, E2c.1, E2c.2, E2c.3, E2e, L12.2.2, L12.2.3 and a portion of E2c.4 to the Fort Ord Reuse Authority (FORA) for economic development and Parcel S1.4 and a portion of Parcel S1.5.1 to the California State University, Monterey Bay for educational purposes (Plate B-1).

A determination of the environmental conditions of the Property was made by the United States Army by conducting an EBS that included reviewing existing environmental documents and completing associated visual site inspections (3/97; 4/97; 9/97). The documents reviewed included the final Fort Ord Community Environmental Response Facilitation Act (CERFA) Report (April 1994), U.S. EPA Region IX's concurrence to the CERFA Report (19 April 1994), and various remedial investigation/feasibility study (RI/FS) documents, remedial action reports, and subsequent approval memoranda. The EBS indicated that the Property is environmentally suitable for transfer. The results are as follows:

- Parcel E2b.1 includes 185 buildings on approximately 85 acres. Parcel E2c.1 contains 1 building on approximately 13 acres. Parcel E2c.3 includes 41 buildings on approximately 60 acres. Parcel L12.2.2 contains 1 building approximately 0.27 acres; Parcel L12.2.3 contains 1 building on approximately 0.26 acres. Parcel S1.4 contains 18 buildings on approximately 90 acres. The portion of Parcel E2c.4 to be transferred includes 8 buildings on approximately 26 acres. The transfer of Parcel E2c.4 excludes that portion of ordnance and explosive (OE) Site 2 that overlies the parcel. The portion of Parcel S1.5.1 to be transferred includes 88 buildings on approximately 100 acres. The transfer of Parcel S1.5.1 excludes the area within Installation Restoration Program (IRP) Site 17 that is currently undergoing remediation. No buildings are present on Parcels E2c.2 or E2e (Plate 2; Main Garrison EBS).
- Asbestos surveys have been completed for the 343 buildings on the Property as part of a facility-wide asbestos survey (Table 3; Main Garrison EBS). These surveys show that 313 buildings contain friable and nonfriable asbestos-containing materials (ACM). Eighty-seven buildings contained friable and nonfriable ACM rated 1 to 5 (immediate total removal to immediate repair with 1-year inspection cycle recommended). The remaining buildings contain friable and nonfriable ACM rated 6 to 13 (good to fair condition). The Army does not intend to remove the ACM in any of these buildings, but only discloses its existence and condition. Recommended inspection of ACM present in these buildings will be the responsibility of the recipient.
- Three hundred fifty-nine buildings on the Property are presumed to contain lead-based paint (LBP) because they were constructed prior to 1978 (1940 through 1976) or have unknown dates of construction. In accordance with the Residential Lead-Based Paint Hazard Reduction Act of 1992, the Army does not intend to abate the LBP presumed to be present in these buildings because they

are not intended to be used as residences. No sampling for lead in soil has occurred on the Property. As agreed upon in an agency meeting on August 29, 1997, lead analytical results from soil samples collected adjacent to buildings on the Peninsula Outreach and the Marina Sports Center parcels will be used to represent lead concentrations in soil around the buildings on the Main Garrison parcels which were constructed of similar materials and during similar time periods. Average concentrations of lead detected in soil around the buildings on the Peninsula Outreach and Marina Sports Center parcels were 99.4 and 228 mg/kg, respectively. The maximum background concentration for lead in soil at Fort Ord is 51.8 mg/kg (Harding Lawson Associates, *Draft Final Basewide Background Soil Investigation, Fort Ord, California [HLA, 1993]*, dated March 15, 1993). The federal Preliminary Remediation Goal (PRG) for residential soil is 400 mg/kg. On the basis of these results, the BRAC Cleanup Team decided that, with regard to LBP in soil on the Property, no further action was necessary (August 29, 1997). Appropriate LBP notice is provided herein.

- No radon levels above 4 picocuries per liter (pCi/L) were detected on the Property during a 1990 survey at Fort Ord.
- Storage and/or use of radioactive commodities was suspected in 62 buildings on the Property. Representative buildings were surveyed and sampled in 1994 by the U.S. Army Environmental Hygiene Agency (AEHA; currently known as U.S. Army Center for Health Promotion and Preventive Medicine [USACHPPM]). No radiological health hazards associated with these buildings were identified by AEHA. The California Department of Health Services (DHS) released for unrestricted use 25 of the buildings in a letter dated June 4, 1997. Release of the remaining 37 buildings is pending.
- Routine application of pesticides occurred around the residential areas on the former Fort Ord, based on available pesticide applications records which date 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 of 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)
 - Chlorpyrifos (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: chlorophacinone; strychnine; brodifacoum; zinc phosphide

- Thurgicide (Dipel)
- There are no polychlorinated biphenyl (PCB) transformers on the Property and there have been no reported releases of PCB-contaminated dielectric fluids.
- OE investigations, consisting of the Archive Search Report and Supplement No. 1 (December 1993 and November 1994, respectively), Site 39 Data Summary and Work Plan (February 1994), OE contractor after-action reports (December 1994, November 1995), working maps, Fort Ord Training Facilities Map, and associated interviews from various ordnance-related community relations activities, show no OE locations on the Property. One potential OE site (OE Site 2) is located immediately adjacent to the Property. The OE site boundaries are based on the latest information from the information sources described above. Early preliminary surveys, including the Archive Search Report (ASR), ASR Supplement, which included interviews with former Fort Ord employees, resulted in identification of a number of OE sites. Some of the sites were identified by more than one source, which resulted in multiple site boundaries for many of the OE sites. Subsequently, the Army has conducted more focused studies including RI/FS studies (associated with former OE use), field work by the Army, other field activities by Army contractors (including OE sampling, mapping, global positioning system [GPS] surveys, and OE removal actions, and the expanded ASR process as part of the Phase I and II EE/CAs), have resulted in a refinement of the site boundaries. The current approximate extent of each of the OE sites is shown on Plate 3 of the Main Garrison EBS.

All or portions of three training areas, Machine Gun Proficiency Training Area (MGPTA) and Machine Gun Squares 3 and 4, lie within the Property. In a letter to the Department of Toxic Substances Control, dated February 24, 1997, the Department of the Army stated that although the MGPTA was identified on training maps, it and the Machine Gun Squares were not identified as a potential ordnance sites, based on the archive search process.

One OE location (OE Site 22; Site 3, Beach Trainfire Ranges) was identified near (approximately 550 feet away) Parcel E2b.1 (Plate 3; Main Garrison EBS). Additionally, one training area (75mm Pack Howitzer Firing Area) that was identified during the archive search, but not designated as a potential OE location, is near (approximately 450 feet away) Parcel E2b.1 (Plate 3; Main Garrison EBS). 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.

- Fifty former underground storage tanks (USTs 1426.1 through .3, 1434.1 through .3, 1480.1, 1483.2, 1487.1, 1489.1 through .3, 1492.1, 1494.1, 1495.1 through .3, 1497.1 through .5, 1636.1, 1670.1, 1670.2, 1680.1, 1685.1 through .3, 1689.1, 1697.1, 1697.2, 1699.1, 2253.1, 3007A.1, 3010.1, 3012A.1, 3025A.1, 3046A.1, 3066A.1, 3107A.1, 3766.1, 3766.2, 3771.1, 3771.2, 3775.1, 3775.2, and 4861.1 through .3) were located on the Property (Plate 3; Main Garrison EBS). Closure for these USTs has been granted by the Monterey County Department of Health (MCDOH).
- Two aboveground storage tanks (ASTs) are present on the property. One 25,000-gallon and one 300-gallon propane ASTs are located near Building 3108 (Plate 3; Main Garrison EBS). Both ASTs are not in use.
- Twenty inactive solid waste management units (SWMUs) are located on the Property (Plate 5). The 20 inactive SWMUs (FTO-013, FTO-017, FTO-019, FTO-023, FTO-040, FTO-041, FTO-044, FTO-048 through FTO-054, FTO-056 through FTO-058, FTO-063, FTO-064, and FTO-069) were identified as being former hazardous material storage areas. SWMU FTO-048 consists of two

separate storage areas (-048A and -048B); only FTO-048B is present on the Property. FTO-048A is immediately adjacent to the Property. No hazardous materials are presently stored on the Property. SWMUs FTO-063, FTO-064, and FTO-069 are recently-identified SWMUs and no evidence of releases were observed at these three SWMUs during a spring 1996 field investigation (*Draft Field Investigation and Data Review, Solid Waste Management Units, Fort Ord, California*, August 8, 1996). The 1996 SWMU Report recommended no further action for all of the SWMUs on the Property.

- Portions or all of five Installation Restoration Program (IRP) sites (18, 19, 23, 24, and 28) are located on the Property. All five sites were investigated under the Fort Ord RI/FS program. Based on the results of site characterization activities at these sites (which included soil gas surveys, soil sampling, and monitoring well installation and sampling), IRP Sites 18, 19, 23, and 28 were categorized as a No Action Sites. The No Action Record of Decision (NoAROD) for all No Action sites was signed by the regulatory agencies in the spring of 1995. Documentation that site-specific no action criteria were met is provided through the Approval Memoranda process. This process is referred to as the "plug-in" process, because the Approval Memoranda plug into the NoAROD. The No Action Approval Memorandum for Site 28 was approved by the U.S. Environmental Protection Agency on August 10, 1995 and by the Department of Toxic Substances Control on October 10, 1995. Agency approval of the Site 18, 19, and 23 No Action Approval Memoranda is pending. IRP Site 24 was categorized as an Interim Action (IA) site. The IA at Site 24 was completed in May 1996, and included soil excavation, soil sampling, and excavation backfilling. The IA Confirmation Report for Site 24 was submitted to the regulatory agencies in January 1997. EPA concurred that no further action is necessary at Site 24 in a letter dated April 4, 1997; DTSC concurrence is pending. Additionally, the OU 2 groundwater plume underlies a portion of the property (Parcels E2c.1, E2c.2, E2c.3, E2c.4, E2e, S1.5.1). As noted below, the remediation system for the OU 2 groundwater plume is operating properly and successfully.
- The final CERFA report indicates that the Property is included in CERFA Disqualified Parcels 4, 21, 25, 33, 102, CERFA Qualified Parcels 99, 113, 114, and 164, and CERFA Parcels 194, 195, 212, and 213.

The final CERFA report identifies the property as being within CERFA Disqualified Parcels 4, 21, 25, 33, and 102. Parcel 4 was disqualified because of (1) the location of the Property above the Fort Ord Landfills (OU 2) groundwater contamination plume, and (2) the inclusion of a portion of the Property in Installation Restoration Program (IRP) Site 28 (see above). Twelve monitoring wells, 3 piezometers, 6 extraction wells, and 2 injection wells are on the Property. Several volatile organic compounds (VOCs) at concentrations below State and Federal maximum contaminant levels (MCLs) have been consistently detected in several of the monitoring wells. Trichloroethene (TCE) has also been consistently detected at concentrations exceeding its MCL in several of the monitoring wells. TCE was detected in Monitoring Well MW-OU2-20-A at a maximum concentration of 16 micrograms per liter ($\mu\text{g/L}$) in a March 1997 basewide groundwater sampling round. Remediation of the contaminated groundwater is underway. The Army has received concurrence from the U.S. EPA (4 January 1996) that the pump-and-treat system for remediation of the OU 2 groundwater plume is in place and operating "properly and successfully." Sampling of the monitoring wells present on the Property will continue under the Fort Ord basewide groundwater sampling program.

Parcel 21 was disqualified because of a release at IRP Site 24 and the presence of Machine Gun Square 3. Parcel 25 was disqualified because hazardous substances had been stored in Buildings 3766 and 3767, and the presence of USTs and IRP Site 23. Parcel 33 was disqualified due to hazardous substance storage at Building 4487, which is not on the Property. Parcel 102 was disqualified due to the presence of the plant nursery where hazardous materials were suspected to have been stored.

The final CERFA report identifies the property as containing CERFA Qualified Parcels 99, 113, 114, and 164 because of (1) the presence of the MGPTA and Machine Gun Square 4, (2) the friable and nonfriable ACM observed within the buildings, and (3) the probable existence of LBP based on the construction dates of the buildings within these parcels.

- The Baseline Risk Assessment for OU 2 indicates that the groundwater does not pose a threat to occupants of the Property provided that groundwater from the contaminated aquifer is not used as a drinking water source. Well drilling and use of groundwater will be prohibited.

National Environmental Policy Act (NEPA) requirements for this transfer were satisfied by either the analyses conducted in the September 1996 Fort Ord Disposal and Reuse Supplement Environmental Impact Statement (SEIS), or the June 1993 Fort Ord Disposal and Reuse EIS.

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 information, 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 or asbestos-containing materials (ACM) have been found on the Property, as described in the Diagnostic Environmental Inc., *Asbestos Survey Report, U.S. Army Corps of Engineers - Fort Ord Installation, Fort Ord, California*, dated April 26, 1993.

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 future remediation of asbestos or damages for personal injury, illness, disability, or death, to the Grantee, its successors or assigns, sublessees, 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, whether the Grantee, its successors or assigns have properly warned or failed to properly warn the individual(s) injured. The Grantee agrees to be responsible for any future remediation of asbestos found to be necessary on this Property.

NOTICE OF THE PRESENCE OF LEAD-BASED PAINT

A. The Grantee is hereby informed and does acknowledge that all buildings on the Property which were constructed or rehabilitated prior to 1978, are presumed to contain lead-based paint. Lead from paint, paint

chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built prior to 1978 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 a particular risk to pregnant women. The seller of any interest in residential real property 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. "Residential Real Property" means any housing constructed prior to 1978, except housing for the elderly (households reserved for and composed of one or more persons 62 years of age or more at the time of initial occupancy) 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.

B. Available information concerning known LBP and/or LBP hazards, the location of LBP or LBP hazards, and the condition of painted surfaces is contained in the Environmental Baseline Survey, which has been provided to the Grantee. All purchasers must also receive the federally-approved pamphlet on lead poisoning prevention. No sampling for lead in soil has occurred on the Property. As agreed upon in an regulatory agency meeting on August 29, 1997, lead analytical results from soil samples collected adjacent to buildings on the Peninsula Outreach and the Marina Sports Center parcels will be used to represent lead concentrations in soil around the buildings on the Main Garrison parcels which were constructed of similar materials and during similar time periods. Average concentrations of lead detected in soil around the buildings on the Peninsula Outreach and Marina Sports Center parcels were 99.4 and 228 mg/kg, respectively. The maximum background concentration for lead in soil at Fort Ord is 51.8 mg/kg (Harding Lawson Associates, *Draft Final Basewide Background Soil Investigation, Fort Ord, California [HLA, 1993]*, dated March 15, 1993). The federal PRG for residential soil is 400 mg/kg. On the basis of these results, the BRAC Cleanup Team decided that, with regard to LBP in soil on the Property, no further action was necessary (August 29, 1997). No other surveys or studies assessing the possible presence of lead-based paint in former or existing buildings on the Property was performed by the Army. The Grantee hereby acknowledges receipt of the information described in this subparagraph.

C. 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 prior to execution of this Transfer.

D. The Grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Real Property without complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards. Prior to permitting the occupancy of Residential Real Property, if required by law or regulation, the Grantee, at its sole expense, will: (1) inspect for the presence of lead-based paint and or lead-based paint hazards; (2) abate and eliminate lead-based paint hazards in accordance with all applicable laws and regulations; and (3) comply with all applicable notice and disclosure requirements under applicable federal and state law. The Grantee covenants and agrees to be responsible for any remediation of lead-based paint or lead-based paint hazards on the Property found to be necessary after the date of conveyance to the Grantee.

E. The Army assumes no liability for remediation or damages for personal injury, illness, disability, or death, to the Grantee, its successors or assigns, sublessees or to any other person, including members of the

general public, arising from lead-based paint or lead-based paint hazards on the Property. The Grantee further agrees to indemnify and hold harmless the Army, its officers, agents and employees, from and against all suits, claims, demands or actions, liabilities, judgments, costs and attorneys' fees arising out of, or in any manner predicated upon, personal injury, death or property damage resulting from, related to, caused by or arising out of lead-based paint or lead-based paint hazards on the Property.

NOTICE OF HAZARDOUS SUBSTANCE STORAGE, RELEASE OR DISPOSAL

The Grantor hereby notifies the Grantee of the former storage of hazardous substances on the Property. The items typically stored on the Property are listed below. The information regarding this storage indicates that it was conducted in a manner that would not pose a threat to human health and the environment. A release occurred from UST 2253.1; however, remediation is complete and the UST was granted closure. A release occurred at IA Site 24 from previous grease rack operations, pesticide use, and buried drums. Soil samples collected from the site contained trichloroethene; 1,1,2,2-tetrachloroethane; tetrachloroethene; benzo(b)fluoranthene; benzo(k)fluoranthene; benzo(a)pyrene; 4,4'-DDT; dieldrin; chlordane; and oil and grease. Remediation was completed. This notice is given pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section (§)120(h)(1) and (3), and no additional action is necessary under CERCLA to protect human health and the environment. CERCLA requires the Grantor to reserve a right of access to the Property in any case in which the potential for a response action or corrective action is found to be necessary. The Grantor shall give Grantee responsible notice of action requiring access to the Property, and Grantor shall, consistent with feasible methods for complying with these actions, endeavor to minimize the disruption of the Grantee's use of the Property.

Location	Typical Material Stored/Quantity	Duration	Release/Disposal
Building 2540	Unknown/Unknown	Unknown	None/None
Building 2560	Unknown/Unknown	Unknown	None/None
Building 2562	Unknown/Unknown	Unknown	None/None
Building 2842	Cleaning compound, developer, fixer, and solvents/Unknown	Unknown	None/None
Building 2850	Unknown/Unknown	Unknown	None/None
Building 3107	Petroleum/Unknown	Unknown	None/None
Building 3127	Unknown/Unknown	Unknown	None/None
Building 3766	Unknown/Unknown	Unknown	None/None
Building 3767	Unknown/Unknown/	Unknown	None/None
Former UST 2253.1	Waste oil/12,000-gallon	Unknown	Yes/None
IA Site 24	Unknown/Unknown	Unknown	Yes/None

NOTICE OF THE PRESENCE OF CONTAMINATED GROUNDWATER

The groundwater beneath Parcels E2c.1, E2c.2, E2c.3, E2c.4, E2e, and S1.5.1, is contaminated with volatile organic compounds (VOCs), primarily trichloroethene (TCE), associated with OU2. The maximum estimated concentration of TCE in the groundwater beneath the Property is 16 µg/L. This notice is provided pursuant to CERCLA § 120(h)(1) and (3). A pump-and-treat groundwater remediation system for OU2 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 express 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 interfere with any remediation system now or in the future located on, over, through, or across any portion of the Property.

The deed will reserve a nonexclusive easement to allow continued access for the Army (or its designated contractor) and the regulatory agencies to permit necessary groundwater monitoring at wells located on the Property. Furthermore, the deed will prohibit all others from tampering with the groundwater monitoring wells.

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.

On the basis of the above information, I conclude that the Property should be assigned Department of Defense (DoD) Environmental Condition Category 4 (areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken) and is transferable under CERCLA Section (§) 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 remedial action under CERCLA found to be necessary after the date of transfer shall be conducted by the United States.

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

Raymond J. Fatz
Deputy Assistant Secretary of the Army
(Environment, Safety, and Occupational Health)