

APPENDIX D

**RESPONSE TO COMMENTS
ON THE DRAFT LITERATURE REVIEW REPORT
ORDNANCE AND EXPLOSIVES
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
FORMER FORT ORD, CALIFORNIA
DATED SEPTEMBER 24, 1999**

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**I. UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION IX,
COMMENTS DATED OCTOBER 29, 1999.**

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document and submits the following comments:

Comment 1: OE Definition – The Literature Review Report (Report) (Section 5.2.1) is the first OE RI/FS document which suggests small arms (50-caliber ball ammunition or smaller) are to be excluded from the definition of OE and thus the RI/FS. The Draft OE RI/FS Work Plan (dated July 30, 1999) Glossary of Terms provides a very general definition which does not necessarily exclude small arms. Matter of fact, the Draft OE RI/FS Work Plan Section 3.2.2 (Firing Ranges) states that, “Property identified as containing firing ranges will undergo further evaluation through the OE RI/FS process (Tracks 1, 2, and 3).” At this Literature Review phase of the process, EPA Region 9 feels that all ranges should be identified (location, munition type, etc.) and included in the Report as potential OE sites, or at least an areas of concern, until the OE Definition is resolved in the Work Plan or appropriate RI/FS document.

Response 1: The Army agrees that the definition of ordnance and explosives (OE) as widely used include small arms, and therefore should be included in the OE RI/FS. A plate showing small arms ranges has been added to the Draft Final Literature Review Report.

However, small arms have historically been considered to have a very low hazard potential. This determination is made by the U. S. Army Engineering and Support Center, Huntsville, in Ordnance and Explosives (OE) Center of Expertise (CX) Interim Guidance Document 99-02. It states that caliber .50 and smaller sized ordnance items are considered small arms, and present a very low risk to the public. Therefore, due to the lack of significant risk the Army does not intend to specifically investigate or respond to the presence of small arms under the OE RI/FS. Small arms ranges are currently being addressed under the Installation Restoration Program (IRP) and Basewide RI/FS for chemical contamination. If information suggests that a small arms range or a portion of a small arms range was used for other ordnance-related use, then that area is investigated under the OE RI/FS. On the other hand, if small arms items are found during OE investigation and response, they will be removed from the site and documented. A brief discussion about small arms has been added to the Draft Final Literature Review Report.

Comment 2: Training facilities – The executive summary states that, “Because no evidence was found that would support the use of ordnance at these locations, they are considered non OE training areas.” Section 5 provides supporting information. The information for several types of training areas (i.e., machine gun squares, mortar squares) does not indicate whether information from interviews was used as supporting evidence. Interviews would help substantiate the assertion that these areas did not use live fire. Please indicate whether interviews were completed or are planned.

Response 2: Reference sources have been added to the Draft Final text.

Comment 3: Incident reports – Based on a review of Table 5 and Plates 12 and 14, it appears that a number of incidents (i.e., Numbers 1, 2, 7, 9, 25, 27, 31, 32) occurred outside of known or suspected OE sites or areas of concern. While Section 5.3 states that, “An evaluation of the items listed on Table 5 and their impact to the property those items were found on, will be included in the applicable associated decision document.” Plate 14 suggests that no further field evaluations for evidence of OE use surrounding the incidents identified above are planned. EPA feels it is appropriate to further evaluate these incident areas, possibly with site walks, to determine whether they represent OE training areas which require more comprehensive evaluation.

Response 3: Incident reports will be evaluated in the respective track decision documents that the underlying land falls into. If an OE related item was found within an area identified for Track 0, that information will be addressed in the Track 0 Technical Memorandum or subsequent Approval Memoranda for the specific area.

Comment 4: Monterey Bay – Page 19 of the Report indicates the Enhanced Preliminary Assessment of Monterey Bay (PA) was reviewed, however the Report does not mention the potential for ordnance to exist in the bay, as the PA indicates. The Report should mention this potential and delineate bay training areas and range fans on the appropriate plates.

Response 4: An evaluation of the Former Fort Ord Restricted Zone was performed by the U.S. Geological Survey and reported in the Southern Monterey Bay Continental Shelf Investigation: Former Fort Ord Restricted Zone, Open File Report 97-450. The Fort Ord Restricted Zone as delineated in Open File Report 97-450, was added to Plate 14 of the Draft Final report. Additional evaluation of Monterey Bay is not part of the literature review.

Comment 5: Future OE site/area identification – Despite the Army’s efforts on this Report, it is possible that following completion of the Report additional information may become available which identifies new areas of potential OE use. The Report and the RI/FS Work Plan should identify the process by which additional information will be documented, evaluated, and worked into the RI/FS tracks.

Response 5: If new information is identified that impacts areas previously identified as non OE areas, the regulatory agencies will be notified. If warranted, land previously identified as Track 0 could be moved into another Track.

II. California Environmental Protection Agency, Department of Toxic Substances Control Comments Dated October 28, 1999.

This transmits our comments on the subject document. It was received in our office September 27, 1999. The U.S. Army requested that we provide comments by October 30, 1999.

General Comments:

Comment 1: It is our position that the purpose of the document is only to compile information and not make conclusions as to a particular area may or may not be an ordnance and explosives waste (OEW) site. A related document, "Track 0 Technical Memorandum" has been planned. We understand that the purpose of this document is to present analysis and conclusions as to whether several specific parcels should be considered areas of OEW concern.

An effort should also be taken on a broader scale to reach conclusions about the information brought out by this literature review, and information gathered in the future. In general, there should be an ongoing effort to continue to collect information on the past use of ordnance and explosives (OE), OEW incidents and any other pertinent information that suggests the possibility of OE use. This information should then be compiled, along with analysis and proposed conclusions in a periodic report to the regulatory agencies. As a first step, the areas of concern, additional areas identified in section 5.0, and the information from the past incident reports that are presented in this literature review should be the subject of a follow up technical memorandum.

Response 1: The purpose of the literature review is to identify areas of previous ordnance-related use based on a thorough review of historical records. The literature review identified known or suspected ordnance and explosives (OE) sites, additional areas of previous ordnance-related use, Non-OE areas, and areas of concern. Each of these areas will undergo further review to reach final conclusions about site conditions and response actions under OE RI/FS. For Track 0, a Technical Memorandum and/or Approval Memorandum will be published providing a more detailed description of the history and use of each transfer parcel, prior to a final decision on whether the area should be considered a Non-OE area. Please refer to Draft Track 0 Technical Memorandum for details about decision-making steps for Track 0 areas.

The Army will continue to collect information related to historical ordnance-related land use at Fort Ord, by maintaining the incident reporting procedures and conducting interviews if and when such persons come forward and are available for interviews. The Army's community outreach activities as outlined in the Community Relations Plan include monthly meetings, participation at local events, and newsletters, and we use these community outreach activities to seek additional information on an ongoing basis.

Comment 2: Prior to proposal of particular parcels as eligible for the Track 0 pathway through the OE RI/FS process, a parcel specific analysis of the potential for OEW presence should be conducted. The results of the analysis may conclude that the parcel is appropriate for Track 0, or that additional research or investigation should be considered based on parcel specific circumstances.

Response 2: Comment noted.

Comment 3: This literature review should provide information on the location and use of ammunition storage areas or supply points. These areas and areas nearby are potentially sites of burial of retrograde or unused ordnance.

Response 3: Three ammunition supply points (ASPs) or storage areas were located at Fort Ord. Each of the three ASPs were used for the storage and distribution of ammunition. The three ASPs are located within or are considered OE sites. The three locations are, the Powder Magazine, OE Site 41, the ASP Grenade area, OE Site 42, and an ASP located at OE Site 22 (Beach Ranges).

Specific Comments:

Comment 1: Section 2.3.4, OE Site Categories. It appears that by default, all OE sites will be sampled. That is, Category A sites are defined as those where no UXO was found during sampling. This is acceptable to the Department of Toxic Substances Control (DTSC). However, the amount and type of sampling is an area that still needs to be agreed upon.

Response 1: Section 2.3.4, OE Site Categories: The inclusion of the OE Site Categories designation from the EE/CA was provided as background only. We agree that some level of field investigation will be completed at all known and suspected OE sites and that specific methods will be identified in the various future work plans as part of the OE RI/FS.

Comment 2: Section 5.2.1 Training Facilities. Potential and known small arms ranges should be reported in this document and followed up as all other types of ordnance sites. This section states that small arms ranges are not considered potential OE sites and therefore not reported in the subject document. DTSC is in the process of considering the scope of the types of ordnance and explosives that we consider dangerous. At this time it is appropriate to include these types of sites in the review process to ensure that they are not lost as we progress through the OE RI/FS.

Response 2: Section 5.2.1 Training Facilities: The Army agrees that the definition of ordnance and explosives (OE) as widely used include small arms, and therefore should be included in the OE RI/FS. A plate showing small arms ranges has been added to the Draft Final Literature Review Report.

However, small arms have historically been considered to have a very low hazard potential. This determination is made by the U. S. Army Engineering and Support Center, Huntsville, in Ordnance and Explosives (OE) Center of Expertise (CX) Interim Guidance Document 99-02. It states that caliber .50 and smaller sized ordnance items are considered small arms, and present a very low risk to the public. Therefore, due to the lack of significant risk the Army does not intend to specifically investigate or respond to the presence of small arms under the OE RI/FS. Small arms ranges are

currently being addressed under the Installation Restoration Program (IRP) and Basewide RI/FS for chemical contamination. If information suggests that a small arms range or a portion of a small arms range was used for other ordnance-related use, then that area is investigated under the OE RI/FS. On the other hand, if small arms items are found during OE investigation and response, they will be removed from the site and documented. A brief discussion about small arms has been added to the Draft Final Literature Review Report.

Comment 3: **Section 5.2.1.1, Machine Gun Squares. Section 5.2.1.2, Mortar Squares. Section 5.2.1.4, Rifle Instruction Circle (RIC) Training Areas. The explanation of the types of use of these areas needs to be supported by providing a source reference.**

Response 3: Section 5.2.1.1/5.2.1.2/5.2.1.4: Reference sources have been added to the text.

Comment 4: **Section 5.2.1.8 OE Sweep Areas. It seems that if an area is designated a sweep area, then there was some level of concern by those in charge at the time that ordnance may be present in the area. This would tend to raise concerns to the extent that the areas should be designated areas of concern and an appropriate level of investigation take place.**

Response 4: Section 5.2.1.8: The concern at the time was that the youth may have dropped an OE item within at least one of the areas identified for the sweep. As stated in the report no record of a sweep in these areas was found and the former range control officer at the time did not recall a sweep being performed. Training area A is now the location of the Abrams and Preston Park housing areas. According to a representative of the US Army Corps of Engineers present during construction of the housing areas, no evidence of OE was found during their construction. A reference will be added to the Draft Final report. As stated in the literature review, Training Area I, also labeled a sweep area, includes all or portions of several previously identified OE sites. These sites include documented areas of ordnance use. Each of these sites has undergone some level of investigation including, either, site reconnaissance, sampling or a removal action. To include areas A and I as areas of suspected ordnance use based on the identified information is unwarranted.

Comment 5: **Section 5.2.1.9 Close Combat Course. Provide some authentication that these types of areas were used exclusively in the way you describe.**

Response 5: Information regarding the use of the Close Combat Course was provided by a former commanding officer of infantry basic training. A reference has been added to the Draft Final report. The Close Combat Course falls within an area identified as an area of concern in the Draft Literature Review. This location will be investigated as part of the investigation of the area of concern.

Comment 6: **Section 5.2.1.10 It is hard to believe that all duds, short round duds, etc. would have been reported. Also, we cannot conclude that all rounds made it to the inland ranges based upon unconfirmed reports that they did. Not all information would likely have gotten reported.**

Response 6: Section 5.2.1.10: The statement that “all rounds fired from the firing points landed in the target area” was made by the range control officer in charge during the period of use. The firing points were infrequently used because of air space restrictions imposed by the nearby Monterey airport, the lack of a sufficient firing point to target distance (space) and because of the noise impact on the surrounding areas. According to range control documentation the number of rounds fired from these firing points was small, with no rounds being fired during some years. Even if the former range control officer was incorrect in his statement, we have no reason to believe that short rounds or misfires would not have been dealt with as required in the Fort Ord Range/Training Area Operating Procedures And Usage Guide cited in Section 5.2.1.10 of the report.

Appendices A and C

Comment 1: The Dec 1, 1976 map shows AR Table Ranges VII and VIII. This, along with the range fan outlines, conflicts with information presented on January 14, 1999 OE Site 15-DRO.1 map. This should be rectified if possible. The map dated December 20, 1956 shows the AR Table Ranges VII and VIII as they are shown in the 1/14/99 map.

Response 1: Comment noted. The literature review did not investigate the accuracy of the range fan locations within OE Site 15. There appears to have been some renaming of range fans in that area in the 1950s and early 1960s. However, comparison of various maps indicate that the range names of these areas, not their locations, have changed over time. Details regarding the various range configurations will be included in the OE RI/FS.

Comment 2: The Archives Search Report’s Master Plan Basic Information, Training Facilities map revised as of June 30, 1961 shows a site titled BM Cruickshank (atomic). What is this site and how was it used?

Response 2: This is the location of a survey bench mark (BM). Maps prior to and after the 1961 map identify the bench mark only as Cruickshank. The significance of the word atomic on the 1961 map is unknown.

Comment 3: The Archives Search Report’s January 1958 Training Area Map shows a “HUMRO (or NUMRO or MUMRO) TEST AREA”, what is this and how was it used?

Response 3: HUMRO is the acronym for Human Research Resources Organization, which is a military organization involved with physiological and psychological testing of military personnel. An interview with a former range control officer indicated that ordnance was not used at the HUMRO area. Therefore the HUMRO area will not be discussed in the Draft Final Report.

Comment 4: The Archives Search Report’s 12/20/56 map shows a “Ranging Area” covering the future location of the Fritzsche airfield area. What is this and how was it used?

Response 4: A discussion of the “Ranging Area” was presented in Section 5.2.1.3 of the Draft Literature Review Report. Interviews with military personnel indicated that the Ranging Area was used for either sighting gun tubes or double checking range finders. This conclusion was also arrived at by the US Army Corps of Engineers, St. Louis District, during completion the ASR investigation.

Comment 5: In Archives Search Report's 6/30/61 map, define as many of the acronyms/abbreviations displayed on the map as possible and provide some analysis of the level of significance of them. There are similar notations on the other maps presented.

Response 5: An acronym list will be included in the Draft Final Literature Review.

Comment 6: In the Archives Search Report's 12/20/56 map, is the dark circle area labeled "Demo Area". Provide any information concerning its purpose and the activities that did or may have occurred there.

Response 6: The "Demo Area" identified on the 12/20/56 Fort Ord Training Area & Facilities map is OE Site 11 (Demolition Training Area). A description and investigation history of this site was included in the ASR. OE removal is in progress at OE Site 11.

Comment 7: In the Archives Search Report's 1/9/53 Master Plan map a range labeled "Known Distance Ranges" extends over much of the area to the south west from just south of the East Garrison. It appears that some of the gray areas bordered by OE 59, 42, 48, 19, should be included in the area of concern. In addition, the north east corner of the present area of concern should be extended to the east to include the base of the range.

Response 7: The Known Distance Ranges were used for small arms (.50 caliber or less) training. The locations of the ranges comprising the Known Distance Ranges are presented on Plate 14 of the Draft Final Literature Review. Several of the target areas associated with the Known Distance Ranges lie within IRP Site 39A. Ranges active in the East Garrison at the time of base closure were investigated for the presence of spent ammunition (i.e., lead) as part of the characterization and remediation of IRP Site 39A. Personnel trained in ordnance recognition accompanied by an ordnance safety specialist walked the target areas. No evidence of OE larger than .50 caliber was observed. Additionally, some of the target areas associated with the Known Distance Ranges were investigated for the presence of lead as part of the Site 39 Small-Arms Investigation. Personnel trained in ordnance recognition accompanied by an ordnance safety specialist walked the target areas. No evidence of OE was found during this investigation. Additional field reconnaissance at target areas associated with the Known Distance Ranges is planned as part of the Site 39 Small-Arms Investigation. As stated in Response 2 (Section 5.2.1), the Army considers small arms a low risk to the public. The Army does not intend to identify the Known Distance Ranges or any other small arms range as areas of concern.

Comment 8: Archives Search Report's map dated 3/68 shows "Range 50" in the "K" Training area. The legend defines this area as an explosive ordnance disposal location. Range 49 is located in the Training Area "J" and appears to be in the same location as OE site 3 which in the text of the report is described as the ordnance demolition area. The conflict should be resolved. There does not seem to be an OE site associated with "Range 50's" location on this map. Range 50 is noted in the discussion of OE-9. However, from comparison of the maps, it seems that neither site 10A nor 10B covers this area. The closest site is OE-9.

Response 8: The location of Range 50 does appear to be outside of OE Site 10A. The former location of Range 50 (Explosive Ordnance Disposal range) is within an area identified as an area

of concern in the literature review. This location will be investigated as part of the investigation of the identified area of concern.

Comment 9: Plate 2 shows property acquisition phases. It indicates that the reservation encompassed more property than it does now. For instance, the areas east of the Fritzsche Airfield and the Laguna Seca property. Some consideration as to the likely presence of OE and other contaminants needs to be given for these. Especially the Laguna Seca area which is bounded on three sides by Fort Ord property.

Response 9: These areas are considered Formerly Used Defense Sites (FUDS) and were not included in the scope of this investigation. If any OE is found in these areas, it will be handled under the FUDS program.

Comment 10: Firing points labeled as “fp-1” and “fp-2” along with associated range fans have been noted on the “Beardsley” map included in the 1997 Revised Archives Search Report. The potential for OEW and OE sites should be evaluated for these areas.

Response 10: Firing Points FP-1 and FP-2 shown on the Beardsley Map correspond to Firing Point 1 and firing Point 2 shown on Plate 8 of the Draft Literature Review Report and discussed in Section 5.2.1.10. Firing Point 1 lies within OE Site 13C. OE Site 13 C was included in the removal action for OE Site 31. The associated range fan for Firing Point 1 lies entirely within previously identified OE Sites or land identified in the Literature Review as areas of concern. These areas are either currently under investigation, have undergone, or will undergo evaluation. Firing Point 2 is located within OE Site 27M. To date, the investigation at OE 27M has consisted of a site walk by the UXO safety specialist. A Risk Assessment Code (RAC) sheet completed for the site walk identified a firing point. The RAC sheet noted expended flares (OE scrap) and small arms, as well as live blank rounds at this location. No evidence of OE or OE scrap related to artillery use was found. The range fan associated with Firing Point 2 lies almost entirely within previously identified OE sites or areas identified in the Literature Review as areas of concern. These areas are either currently under investigation or have undergone or will undergo evaluation.

Comment 11: Regarding Appendix C map dated May 2, 1988, it would be helpful if the illegible portions of the legend and range listing could be deciphered as best as possible and provided along with the map. Is the legend contained in the map dated December 1, 1976 identical to that in the May 2, 1988 version?

Response 11: The original map is of poor quality. The legends on the referenced maps appear almost identical. The number and locations of the ranges identified on both maps is the same. The range use information is also almost identical with some detail on range use differing between the two maps. The map dated May 2, 1988 includes Ranges 1 through 48 which are located either within the Multi-range/impact area (Ranges 18-48) or are the “Beach Ranges” (Ranges 1-17). Range 49 is OE Site 3. Range P-5 is OE Site 14D. The last three ranges, listed as Ranges 1, 2, and 3, are small arms ranges located at the East Garrison. 1A is the Leadership Reaction Course located at the East Garrison, and 2A is the Heavy Vehicle Driving Course also located at the East Garrison.

APPENDIX E

**SUMMARY OF PUBLIC COMMENTS AND RESPONSES
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Comments were received from Save Our Air Resources (S.O.A.R., represented by Ms. Linda Millerick) and from Ms. Debora Bailey of Marina.

Thank you for taking the time and effort to review and comment on the Draft Literature Review Report. The Army has attempted to address concerns submitted from both parties. In order to avoid repetition, similar comments submitted by both SOAR and Ms. Bailey have been summarized and grouped together. Comments submitted by S.O.A.R. are noted by "SOAR" and comments from Ms. Bailey are noted by "Bailey."

Comment 1: The adequacy of the investigation was raised in several comments from S.O.A.R. and Ms Bailey. Concerns included:

- **No interviews with people who may have served prior to 1930s (Bailey)**
- **Adequacy of training maps for decision making (Bailey)**
- **Use of OE near roads, and towns (Bailey)**
- **Possibility that OE may be found at depths deeper than the maximum penetration depth (Bailey)**
- **Sampling procedures (Bailey)**
- **Too few people were interviewed (Bailey, SOAR)**
- **Ad in USA Today was not best place to seek information (Bailey)**
- **OE found at sites did not reflect designated use (Bailey).**

Response 1: The literature review was completed following in the Literature Review Work Plan and using the guidance documents referenced therein. The literature review provides a starting point to the overall Ordnance and Explosive Remedial Investigation/Feasibility Study (OE RI/FS), and provides a thorough review of historical records related to previous ordnance-related activities at Fort Ord.

This document identifies areas that are suspected of previous OE use based on review of existing historical documentation and interviews. A brief summary of other activities that will be conducted as part of the OE RI/FS is provided below. Please refer to Draft OE RI/FS Work Plan for more information.

- Technical Memorandum and/or Approval Memorandum will be published providing a more detailed description of the history and use of each transfer parcel prior to a final decision on whether the area should be considered a Non-OE area.

Please refer to Draft Track 0 Technical Memorandum for how the decision will be made for Track 0 areas under the Fort Ord OE RI/FS.

- A review of past OE investigation and removal actions will be completed as part of the OE RI/FS. A work plan describing the methods that will be used to evaluate the past work is in preparation. The evaluation of past work will review the adequacy of past investigation and removals.
- A work plan describing the procedures for conducting OE investigation and response actions will be produced.

The inclusion of the OE Site Category designations as defined in the Phase 2 Engineering Evaluation/Cost Analysis (EE/CA) were provided for background information only. Site specific information regarding sampling protocols and sampling results can be found in the site specific OE after action reports. These reports are available in the Fort Ord Administrative Record.

In response to comments on too few individuals having been interviewed as part of the Literature Review, the Army did attempt to locate others who might have information on training at Fort Ord through publishing advertisements in both USA Today and the Army Times as part of the Final Engineering Evaluation/Cost Analysis – Phase 1, Former Fort Ord, Monterey, California dated April 1998. These advertisements provided a toll free telephone line for responses. A total of 26 telephone responses were received. Information collected from the interviews was used in preparation of the EE/CA and reviewed as part of the Literature Review effort. In addition, as part of the Literature Review, a request for information on ordnance use and training at Fort Ord was submitted to the Fort Ord Alumni Association. To date, no responses have been received.

The Army will continue to collect information related to historical ordnance-related land use at Fort Ord, by maintaining the incident reporting procedures and conducting interviews if and when such persons come forward and are available for interviews.

Comment 2: The potential for reuse of the Former Fort Ord was questioned

- **Concerns included digging, constructing and living in areas not investigated for OE (Bailey)**
- **Possibility for people to be injured or killed by OE (Bailey)**
- **OE has been found at and around housing areas, housing areas are located on top of former OE sites (Bailey, SOAR).**

Response 2: The Army is concerned about the potential reuse at Fort Ord. The OE RI/FS process is intended to evaluate the entire Fort Ord property and to make reasonable assurance that public safety will not be compromised. Regulatory oversight is provided by U.S. Environmental Protection Agency (EPA) and California-EPA, Department of Toxic Substances Control (DTSC). However, the purpose of the literature review is to identify areas of previous ordnance-related use and not to address reuse issues at Fort Ord. The issues of reuse and safety will be addressed in other documents; (1) the risks associated with reuse of OE sites will be evaluated in the OE RI/FS, and (2) the Environmental

Baseline Survey (EBS), Finding of Suitability to Transfer (FOST), Finding of Suitability For Early Transfer (FOSET) and Finding of Suitability for Lease (FOSL) process will identify all issues impacting the property including OE.

Comment 3: Is there enough data to designate areas as Non-OE Areas

- **Will all incident reports be investigated, should there be more OE Sites (Bailey)**
- **All OE Scrap found should be documented and reported (Bailey)**
- **Because records were lost or destroyed all of Fort Ord is suspect (Bailey)**
- **When exactly did training begin (Bailey).**

Response 3: Prior to final designation as a Non-OE area, all available OE-related information will be reviewed on a transfer parcel specific basis. The results of this effort will be presented in a Technical Memorandum or Approval Memorandum as discussed under response to item 1 above.

Comment 4: Concern was raised over chemical contamination related to the landfill and contaminated soil excavated at Fort Ord. (Bailey)

Response 4: The Literature Review does not address chemical contamination. However, results of investigation and intrusive activities at sites with chemical contamination were reviewed for any information that could serve as additional supporting documentation to define areas of OE use. Chemical contamination at Fort Ord is being addressed under the Installation Restoration Program (IRP) or Basewide RI/FS for chemical contamination. Sampling results from these investigations can be found in the applicable site characterization and site confirmation reports. These reports are part of the Fort Ord Administrative Record.

Comment 5: Questions about the adequacy of ordnance recognition class completed by field personnel investigating chemical contamination, and their requirement to report findings of ordnance-related evidence, were raised. (Bailey, SOAR)

Response 5: USACE has stringent safety requirements and standards for any contractors or personnel working under its projects. Contractors are required to report any conditions that pose potential safety threat, such as discovery of ordnance-related items. USACE enforces safety requirements through inspection, supervision and reporting as appropriate, and any practices that are inconsistent with these requirements are not tolerated.

Comment 6: The Land Use (Section 2.2.1) should be updated to include current population information and residential nature of area surrounding Fort Ord. (SOAR)

Response 6: Text has been revised to state that residential use also occurs south and east of Fort Ord.

Comment 7: Comments were made regarding open detonation, prescribed burn, and groundwater monitoring for chemical contamination. (Bailey, SOAR)

Response 7: We understand that the issues pertaining to open detonation, prescribed burning, and groundwater monitoring are extremely important, however, these issues are outside the

scope and investigation of the Literature Review. Documents related to these topics are currently available or will be available, for public review and comment at a later date.

Comment 8: Comments on the Archives Search Report (Appendix A) Sections 1.2, 3.1, 3.3.2, 4.1, 4.3, 4.3.1, 6.0-6.70, requesting detailed and site specific information. (SOAR)

Response 8: Comments on the Archives Search Report (ASR) are noted. The ASR was included as an appendix for informational purposes only. Changes to the ASR are not part of the scope of the Literature Review. Details regarding population, geology, hydrogeology etc., will be included in the OE RI/FS to the extent necessary to describe site conditions and evaluate cleanup alternatives. Specific questions regarding items found at OE sites (including location, disposition, disposal methods, etc.) are discussed in the Phase 1 and 2, Engineering Evaluation/Cost Analysis (EE/CA), and/or the site specific OE after action reports (if OE removal is complete), and are available in the Fort Ord Administrative Record.

In response to the mustard gas issue, a detailed description of the discovery and investigation of the empty drum with HD mustard markings was provided to Ms. Millerick in a letter dated September 22, 1999. As stated in the letter, “no mustard agent was detected in the drum or the soil beneath the drum.” Further, “no evidence exists that drums of mustard were stored or used on Fort Ord.”

Comment 9: Table 5: OE site number column-many listed none. Were these items found outside of OE sites? If so, maybe there should be more OE sites than there are in this draft. (Bailey)

Response 9: Locations of OE items reported in incident reports are presented on Plate 12 of the Draft Literature Review report. As indicated on Plate 12 several of the items found were found outside of the identified OE sites. However, the presence of single OE item does not necessarily indicate an area of OE use. Isolated items may be present for a variety of reasons including disposal. The designated site use is also considered. Items may also be present as the result of their drifting from nearby or adjacent OE sites (e.g., flares). Items found adjacent to OE sites may also indicate that the boundary of the OE site may require expansion.

Comment 10: Pg.22, Sec. 4.2.9: “In general, USA does not fill out incident reports in response to ordnance finds they determine are OE scrap.” If OE scrap is found, it is likely that more OE is around. This is another case of incomplete record keeping. All OE and OE scrap should be reported and documented. (Bailey)

Response 10: All ordnance finds, whether OE scrap or live, when reported, are documented. All Army contractors are required to report OE items found. Every OE item reported whether OE scrap or live is responded to and a response is filed. The immediate area where the item was found is searched. If the item reported is determined by the responding OE contractor or the responding UXO safety specialist to be scrap, a report on the response to the incident is not always generated.

Comment 11: Pg. 23, Sec. 4.3: “Telephone and personnel interviews were conducted with persons listed in Section 6.” Apparently you interviewed or contacted 23 people-that is not enough. What were their dates of service at Ft. Ord? Could they have witnessed

every incident at the fort? What about interviews with those who served before the 1930s? Interviewing so few people is outrageous.

“Additional interviews will be conducted if persons with possible information related to historical OE use at Ft. Ord are identified.” Does the Army keep records of who served at Ft. Ord? I think everyone who served, worked, trained or lived on or near the base should be interviewed. (Bailey)

Response 11: In addition to interviews conducted for this investigation interview records conducted for other OE and non OE-related investigations were also reviewed and included the ASR, Phase 1 EE/CA, the Enhanced Preliminary Assessment of Monterey Bay, and Volume I of the Literature Review and Base Inventory Report. The Army has interviewed all those who have come forward with information. The Army continues to seek out new information at local public events such as the County fair. As stated in the Comment 1 Response, the Army will continue to collect information related to historical ordnance-related land use at Fort Ord, by maintaining the incident reporting procedures and conducting interviews if and when such persons come forward and are available for interviews.

Comment 12: Pg. 28, Sec. 5.2.1.8: “To develop an SOP for the sweep and clearing of open areas near housing areas...coordination should be made between the 49th EOD and the sweeping unit.” This proves the Army built houses in areas where ammunition was spent. Then on page 29, it is stated that the 49th EOD records have probably been destroyed.

“Training area A was first indicated on the 1976 Training Facilities Plan. Prior to this date this area was referred to as Training area D or not formally designated...” I believe the housing in the Patton Park area was built between 1956 and 1964. Was it housing or training in 1976? (Bailey)

Response 12: The Patton Park housing area, which lies adjacent to Area A/D was constructed between 1962 and 1969. Housing construction within Area A/D included Abrams Park (1978 to 1982) and Preston Park (1987 to 1990). The proposed sweep area was adjacent to the Patton Park housing area and within the area that would later become the Abrams and Preston housing areas. No ordnance related items were found during the construction of the Abrams and Preston Park housing areas.

Comment 13 Pg. 30, Sec. 5.2.1.11: “MST and RRST, the definition of these acronyms and the exact use of this area is unknown.” This sounds like another incident of sloppy record keeping. We must know what MST and RRST mean—could it be CWM (chemical warfare material)? I request extensive soil sampling in and around this area. (Bailey)

Response 13: As stated in the Draft Literature Report the exact meaning of MST and RRST is unknown. No evidence has been found that would indicate that the area labeled as MST and RRST pertains to Chemical Warfare Material (CWM). Neither MST or RRST stands for CWM. The area was sampled for OE by an ordnance removal contractor and no evidence of OE was found. Additionally, no evidence of OE was found during the construction of the housing area (Schoonover) that currently stands in the location of the

former MST and RRST training area. Based on the available information, extensive soil sampling in this area is unwarranted.