

Fort Ord Community Advisory Group

"The Fort Ord Community Advisory Group (FOCAG) is a public interest group formed to review, comment, and advise on the remediation (cleanup) of the Fort Ord Army Base Superfund Site, to ensure that human health, safety, and the environment are protected to the greatest extent possible." - Mission Statement

By definition: A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). Included are lands judged not fit for human habitation.

Subject: Quality Assurance Project Plan, Former Fort Ord, California, Volume 1, Appendix D, Draft Final Revision 8, Landfill Gas Monitoring at Operable Unit 2
Dated: December 28, 2023
Prepared by Ahtna Global, LLC

To: Joelle Lobo, BRAC Environmental Coordinator
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Via email: joelle.l.lobociv@army.mil
To be followed by a signed hard copy sent via U.S. Mail
C.c. U.S. EPA Region IX, California DTSC, Central Coast Regional Water Quality Control Board

For the Administrative Record

January 28, 2024

Dear Joelle Lobo,

The FOCAG has the following responses, comments, and suggestions;

- 1) The FOCAG is pleased to see that BRAC/AHTNA incorporated the project area description in this Draft Final as sent by DTSC comments, regarding the Draft version, and found in the Administrative Record at;
AR-OU2-702T.3//OU2-702T.3pdf

- 2) Is there a record of the cancers, numbers and types, from former civilian and military personnel living on, or near former Fort Ord. Where is it?
- 3) This document should state that OU2 landfill settling/subsidence was determined not to be a problem in a recent Fort Ord document.
- 4) This document should inform the reader that the OU2 landfills were moved and despite State of California regulations, were created as unlined landfills because, it was argued, they were on Federal Property. The new unlined landfills were called Corrective Action Management Units (CAMU) with engineered covers. Old material was moved and dumped into these with a cap over the top, to prevent migration of toxics underground. It was a FOCAG member that described this as being like a shower cap. Maybe, maybe not, as effective as fully lined landfill, but less expensive initially.
- 5) Page 4 of this document has a helpful listing of some previous monitoring documents regarding Fort Ord's OU2, from July 15, 1994 to July 23, 2019. Twelve documents in all. However, it does not provide the Administrative Record Numbers to more easily locate these historical documents. Why?
- 6) Page 13, 3.1.1 Background and History. Thank you DTSC!
- 7) Army completed the CAMU's on Fort Ord approximately 22 to 24 years ago. Following this, there have been efforts to capture and dispose of the gasses emanating upward and outward, from the approximate 585,000 cubic yards of wastes disposed of here. The FOCAG has asked for copies of notices sent to neighbors, and how far, measured laterally? What were previous notices sent and when? What are current notices sent? We don't recall seeing these.
- 8) Page 14 briefly describes remediation of various Site 39 training range lands by placing remediation waste, including ordnance (mostly spent, lots of lead), on top of the existing engineered cover(s). Then, covering this with a second engineered cover, sealing it at the edges. The FOCAG was at the Technical Advisory Meeting when this was explained by a BRAC hired consultant to be "like a calzone!" This "vertical expansion" is described as being approximately 200,000 cubic yards of additional remediation waste, in, at least, two phases. Can you provide, for the FOCAG and the reader, how large 200,000 cubic yards is height, length, and width?
- 9) The top of Page 15 states that the most recent 5-Year Review for the Fort Ord Superfund Site "identified no issues for the OU2 landfills." This paragraph is immediately followed by 3.1.2 Sources of Known or Suspected Hazardous Waste where it advises, "No detailed records were kept on the amount or types of wastes disposed of at the OU2 Landfills." This is followed by 3.1.3 (page 15) "Known Contaminants" where VOC's are identified, and

infiltration/percolation to groundwater are identified as compounds of interest.

- 10) Section 3.1.5 informs the reader that the closest residence is 368 ft. from the landfills perimeter. This is a new admission for BRAC documents. Although cautionary language is used, it waters down the threat by telling the reader there are risks in the entire Fort Ord area. We know that the Base was a Superfund Site, much still is. The off gassing at the OU2 site likely has much to do with which way the coastal winds are blowing, can't stop those.
- 11) 3.1.6 identifies the 368 ft. measurement distance to being residential housing for CalState University Monterey Bay (CSUMB). Distances to other residential is not disclosed however, this document does say, "quitclaim deeds for land within 1,000 ft. of the OU2 landfills also include a notification stating landowners should refer to 27CCR Section 21190, which identifies protective measures for structures built on or within 1,000 ft. of a landfill." The FOCAG asks how difficult would it have been to include the exact protective language in this BRAC document for all to read? Can it please be included in the Final of this document? Also, how many people have been notified?
- 12) 3.1.8 Geology and Hydrology is two paragraphs long. The short description of the landfill burial trenches in sand approximately 30 ft. wide, 10 to 15 ft. apart and 10 to 30 ft. deep is how the Army bulldozers used to bury refuse, unused ordnance, spent military munitions, chemicals, most all over Ft Ord training range lands. The last sentence in the first paragraph sums up, "The chemicals are believed to have migrated away from the landfilled materials as vapors or as solutes in leachate (Army, 1995). The second paragraph brings back memories of BRAC personnel advising Fort Ord Community Involvement Workshops (C.I.W) that there was an impermeable aquitard that prevented chemical groundwater contamination from contaminating lower aquifers or those offsite of Fort Ord. When testing began to show differently the response given to those at the C.I.W. was, "There must be a hole in the aquitard or something."
- 13) Pages 19 through 28 in this document, the FOCAG refers to as the "IF" pages. We are pleased to see boundaries, approaches, ways of analyzing, standards, and plans for obtaining data. There are a LOT of "IFS". However, the analytic approaches and decision rules are so very important. Thank you Regulators! If you don't get changed out, it may happen.
- 14) Figure 1 toward the end of this document is a full page "location map" that can be made more effective in the Final version. The FOCAG requests that the portion of the "IMPACT AREA" formerly known as Site 39, on this map, identify that it sits directly over the Seaside Groundwater Basin that is the

largest source of potable water for the entire Monterey Peninsula. Secondly, please identify the portion that was the Naval Bombardment area.

Thank you for the opportunity to comment. This is a very important document. The FOCAG asks, when will our questions be answered?

Respectfully,

Mike Weaver
Co-Chair, FOCAG