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: Draft Final Operable Unit Carbon Tetrachloride Plume Upper-180 Foot Aquifer Remedial Design Addendum, Former Fort Ord, California

Dated: September 2023

Prepared by Ahtna Global, LLC

To: Curtis Payton, BRAC Environmental Coordinator

U.S. Army Fort Ord BRAC Field Office

P.O. Box 5008

Monterey, CA 93944-5008

Via fax: 831-393-9188 and email: r.c.payton.civ@army.mil to be followed by a signed hard copy sent via U.S. Mail

C.c. via email

U.S. EPA Region IX, California DTSC, Central Coast Regional Water Quality Control Board

For the Administrative Record

October 16, 2023

Dear Curtis Payton,

The FOCAG takes exception to the response BRAC labels as COMMENT 2 in this OUCTP-0109A document:

"FOCAG COMMENT 2: Wasn't FO-29 taken offline for several years due to not meeting drinking water standards?" Page 2

RESPONSE TO COMMENT 2: The U.S. Department of the Army (Army) and MCWD test water supply wells FO-29, FO-30, and FO-31 at least every three months and there has been no indication these wells are not meeting drinking water standards."

The FOCAG rebuttal to this BRAC response as published in the Draft Final is:

Army BRAC's own data reflects a maximum contaminant level of .5 for Carbon Tetrachloride. Quarterly test results show that it tested at .5 (the maximum) many times. On 12/16/2010 it tested at .78.

That may be the time that the California State Dept. of Health Services had FO-29 pulled offline.

This issue of Carbon Tetrachloride in the MCWD drinking water came up at a BRAC Community Involvement Workshop. CDHS representatives were there. The public was told that MCWD water well FO-29 was pulled offline. It was some time later the public learned that the three wells 29, 30, and 31

were having their waters blended by MCWD to achieve legally potable water. There was still contamination but the blended amounts were below State mcl standards.

Attached: a portion of California State's Geotracker for MCWD's FO-29 for 12/16/2010

https://shorturl.ac/7b5x5

MARINA COAST WATER	State Well #:	
DISTRICT (MARINA)	CA2710017_026_026	
WELL 29 (A)	Well Source : Groundwater	
11 RESERVATION ROAD	Well Status: Active Raw	
MARINA, CA 93933933		

12/16/2010	CARBON TETRACHLORIDE	0.78	UG/L	0.5
				1

Page 3

Further, as the FOCAG recalls, the MCWD then set about drilling additional water wells as close to the Salinas Valley as possible. These additional MCWD production wells are about 800 feet deep. These newer wells are in the Salinas Valley Groundwater Basin. The water located in the SVGWB at these depths is ancient water, the amounts of which are unknown at this time.

The FOCAG asks why the entirety of the comment letter(s) are not published in the Draft Final?.

Thank you for the opportunity to comment.

Respectfully,

Mike Weaver Co-Chair FOCAG