

**EPA Superfund  
Record of Decision:**

**FORT ORD  
EPA ID: CA7210020676  
OU 05  
MARINA, CA  
04/13/1995**

No Action Plug-In Record of Decision  
Fort Ord, California

February 1995

United States Department of the Army  
Sacramento Corps of Engineers

CONTENTS

1.0 DECLARATION ..... 1

    1.1 Site Name and Location ..... 1

    1.2 Basis and Purpose ..... 1

    1.3 Description of the Selected Remedy ..... 1

    1.4 Declaration Statement ..... 2

2.0 DECISION SUMMARY ..... 3

    2.1 Site Description ..... 3

    2.2 Site History ..... 3

    2.3 Enforcement and Regulatory History ..... 3

    2.4 Highlights of Community Participation ..... 4

    2.5 Scope and Role of No Action ..... 4

    2.6 Characteristics of a Typical No Action Site ..... 4

    2.7 Summary of Site Risks ..... 5

        2.7.1 Human Health Considerations ..... 5

        2.7.2 Protection of Groundwater ..... 6

        2.7.3 Ecological Considerations ..... 6

    2.8 Approval Process for No Action ..... 6

    2.9 Documentation of Significant Changes ..... 7

3.0 RESPONSIVENESS SUMMARY ..... 8

    3.1 Overview ..... 8

    3.2 Background on Community Involvement ..... 8

    3.3 Summary of Comments Received during the Public Comment Period and  
    Department of the Army Responses ..... 8

        3.3.1 Summary and Response to Local Community Concerns ..... 9

            3.3.1.1 Public Comments Regarding Community Relations ..... 9

        3.3.2 Summary and Response to Written Specific Technical Questions .... 9

            3.3.2.1 Reprint of, and Army Response to, the Letter Received  
            from the California Coastal Commission ..... 9

TABLE

1 Preliminary Remediation Goals

PLATES

1 NPL Site Map

2 Site Eligibility and Implementation Process Flowchart

This document was prepared by Harding Lawson Associates at the direction of the U.S. Army Corps of Engineers (COE) for the sole use of the COE and the signatories of the Federal Facilities Agreement, including the Army, the U.S. Environmental Protection Agency, the California Environmental Protection Agency, including the Department of Toxic Substances Control (formerly, the Toxic Substances Control Program of the Department of Health Services), and the Regional Water Quality Control Board, Central Coast Region, the only intended beneficiaries of this work. No other party should rely on the information contained herein without prior written consent of the COE and Army. This report and the interpretation, conclusions, and recommendations contained within are based on information presented in other documents that are cited in the text and listed in the references. Therefore, this document is subject to the limitations and qualifications presented in the referenced documents.

## **1.0 DECLARATION**

### **1.1 Site Name and Location**

Fort Ord is located near Monterey Bay in northwestern Monterey County, California, approximately 80 miles south of San Francisco. The base comprises approximately 28,000 acres adjacent to the cities of Seaside, Sand City, Monterey, and Del Rey Oaks to the south and Marina to the north. The Southern Pacific Railroad and Highway 1 pass through the western portion of Fort Ord, separating the beach front from the rest of the base. Laguns Seca Recreation Area and Toro Regional Park border Fort Ord to the south and southeast, respectively. Land use east of Fort Ord is primarily agricultural.

### **1.2 Basis and Purpose**

This decision document presents the No Action Plug-In Record of Decision (ROD) for selected areas at Fort Ord, California (see Plate 1). The plug-in ROD describes the process for identifying a No Action site. Site specific documentation justifying that the no action criteria has been met will be provided subsequent to this ROD through an Approval Process. This process is referred to as the "plug-in" process, because the Approval Memoranda plug into the ROD. This plug-in ROD was prepared in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendment and Reauthorization Act (SARA), and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the Administrative Record for Fort Ord.

The United States Environmental Protection Agency (USEPA) and the State of California concur with the No Action site criteria.

### **1.3 Description of the Selected Remedy**

A No Action site is a site where remedial action is not necessary to protect human health and the environment. No action (i.e., no treatment, engineering controls, or institutional controls) would be warranted under the following general sets of circumstances applicable to sites at Fort Ord:

- Where the baseline risk assessment or screening risk evaluation concluded that conditions at the site pose no unacceptable risks to human health and the environment
- Where a release involved only substances exempt from remedial action under CERCLA Section 101 (investigation and/or remediation may be undertaken pursuant to other state or federal authority)
- Where a previous response action (e.g., interim remedial action or removal action) eliminated existing and potential risks to human health and the environment such that no further action is necessary.

Although the No Action sites at Fort Ord do not require treatment or controls, groundwater monitoring may be performed as part of basewide monitoring activities.



## **2.0 DECISION SUMMARY**

### **2.1 Site Description**

Fort Ord is located near Monterey Bay in northwestern Monterey County, California, approximately 80 miles south of San Francisco. The base comprises approximately 28,000 acres adjacent to the cities of Seaside, Sand City, Monterey, and Del Rey Oaks to the south and Marina to the north. The Southern Pacific Railroad and Highway 1 pass through the western portion of Fort Ord, separating the beach front from the rest of the base. Laguna Seca Recreation Area and Toro Regional Park border Fort Ord to the south and southeast, respectively. Land use east of Fort Ord is primarily agricultural.

### **2.2 Site History**

Since its opening in 1917, Fort Ord has primarily served as a training and staging facility for infantry troops. No permanent improvements were made until the late 1930s, when administrative buildings, barracks, mess halls, tent pads, and a sewage treatment plant were constructed. From 1947 to 1975, Fort Ord was a basic training center. After 1975, the 7th Infantry Division (Light) occupied Fort Ord. Light infantry troops are those that perform their duties without heavy tanks, armor, or artillery. Fort Ord was selected for closure in 1991. The majority of the soldiers were reassigned to other Army posts in 1993. Although Army personnel still operate the base, no active army division is currently stationed at Fort Ord.

The three major developed areas within Fort Ord are the Main Garrison, the East Garrison, and Fritzsche Army Airfield (FAAF). The remaining undeveloped property (approximately 20,000 acres) was used for training activities. The Main Garrison contains commercial, residential, and light industrial facilities. It was constructed between 1940 and the 1960s, starting in the northwest corner of the base and expanding southward and eastward. During the 1940s and 1950s, there was a small airfield in the central portion of the Main Garrison. This airfield was decommissioned when FAAF was completed, and the airfield facilities were redeveloped as motor pools or for other operations. FAAF, which serves as the general airfield for Fort Ord, is in the northern portion of the base, adjacent to the city of Marina. FAAF was incorporated into Fort Ord in 1960 and expanded in 1961. The East Garrison occupies 350 acres on the northeastern edge of the base and consists of military and industrial support areas, recreational facilities, and recreational open space.

Generally, any chemicals present in soil at potential No Action sites are the result of former routine maintenance and support activities on Fort Ord. Such activities include: maintenance of military vehicles at wash racks, tank storage of chemicals such as waste oil, the use of oil/water separators in drainage areas, and pesticide use and storage.

### **2.3 Enforcement and Regulatory History**

Environmental investigations began at Fort Ord in 1984 at FAAF under Regional Water Quality Control Board (RWQCB) cleanup or abatement orders 84-92, 86-86, and 86-315. Investigations indicated the presence of residual organic compounds from fire drill burning practices at the Fire Drill Burn Pit (Operable Unit 1 or OU-1).

The subsequent Remedial Investigation/Feasibility Study (RI/FS) for OU-1 was completed in 1988, and cleanup of soil and groundwater begun. A plan describing the cleanup process was presented to the public in June 1987. In 1986, under RWQCB cleanup or abatement orders 86-87, 86-317, and 88-139, further investigations began of the landfill areas (Operable Unit 2 or OU-2), and the preliminary site characterization was completed in 1988. In 1990, Fort Ord was placed on the

U.S. Environmental Protection Agency's (USEPA) National Priorities List (NPL) primarily because National Priorities List (NPL) primarily because of volatile organic compounds found in groundwater beneath OU-2, and a Federal Facility Agreement (FFA) under CERCLA Section 120 was signed by the Army, USEPA, DTSC, and RWQCB. The FFA establishes schedules for commencing remedial investigations and feasibility studies, and requires completion of remedial actions as began in 1991, and Fort Ort was placed on the Base Realignment and Closure List (BRAC). The final Feasibility Study for OU-2 was completed October 1, 1993 and the ROD was signed in August 1994. An Interim Action Plug-In ROD was signed in March 1994 which allows for excavation and treatment of shallow contaminated soils. The Draft and Draft Final versions of the Basewide RI/FS were completed on August 1, 1994 and December 5, 1994, respectively.

## **2.4 Highlights of Community Participation**

On September 15, 1994, the United States Department of the Army (Army) presented the Proposed Plan for No Action at Fort Ord to the public for review and comment. The Proposed Plan summarizes information on the No Action process and other documents in the Administrative Record for the base. These documents are available to the public at the following locations:

Chamberlain Library,  
Building 4275 North-South Road,  
Presidio of Monterey Annex, California; and

Seaside Branch Library,  
550 Harcourt Avenue, Seaside, California.

The entire administration record is available at 1143 Echo Avenue, Suite F, Seaside, California.

Comments on the Proposed Plan were accepted during a 66-day public review and comment period that began on September 15, 1994 and ended on November 21, 1994. A public meeting was held on September 22, 1994, at the Sherwood Hall, Santa Lucia, in Salinas, California. At that time, the public had the opportunity to ask representatives from the Army, U.S. EPA, and Cal EPA questions and express its concerns about the plan. In addition, written comments were accepted during the public comment period. Responses to comments received during the public comment period are included in the Responsiveness Summary (Section 3.0), which is part of this No Action Plug-In ROD.

## **2.5 Scope and Role of No Action**

The No Action ROD will document that any necessary remedial actions under CERCLA have been taken at sites or that remedial action is not necessary for the two No Action categories described below. Additionally, a No Action ROD would provide a basis for deletion of the property from the NPL. The scope of the No Action process is to address categories of sites where remedial action is not necessary to protect human health and the environment, or CERCLA does not provide the appropriate authority to take any remedial action at the site. Plate 1 identifies 41 areas on Fort Ord where No Action may be implemented.

In 1991, Congress mandated a 3-year completion schedule for RI/FS documents for closing BRAC sites such as Fort Ord (Public Law 102-190). The impact of Fort Ord's closure on the local economy is one reason to undertake a No Action process in order to facilitate release of property at Fort Ord for redevelopment. Conversion of Fort Ord property to civilian uses is a high priority for the local community, the agencies involved, and the Army. To meet Fort Ord's mission of transferring real property as soon as possible, site identification, remedial

investigations, and cleanup at Fort Ord are being accelerated. By completing and implementing the No Action ROD and eliminating these sites from the basewide RI/FS, the properties would become available for reuse much earlier than the previously scheduled date.

## **2.6 Characteristics of a Typical No Action Site**

This section describes the characteristics of a no action site but does not identify specific sites. Site-specific no action decisions will be made through the approval process described in Section 2.8.

No Action sites at Fort Ord fall under two categories:

### **Category 1 Sites**

Category 1 sites are already in a protective state and pose no current or potential threat to human health or the environment. Fort Ord contains areas where storage and/or release or disposal of hazardous substances has occurred and some level of contamination may be present; however, in order to be included as a Category 1 site, the level of contamination that exists at a site must be below the levels required for protection of human health and the environment. Examples of Category 1 sites could include sites where a previous response action mitigated the threat; sites where concentrations are below basewide background levels, or risk-based cleanup levels (e.g., Preliminary Remedial Goals [PRGs] [Table 1]); and sites at which the threat no longer exists because of natural environmental processes.

### **Category 2 Sites**

Category 2 sites are sites where CERCLA does not provide the appropriate authority to take any remedial action except to the extent that the FFA provides for corrective action under the Resource Conservation and Recovery Act (RCRA). These sites would include two types (Plate 2):

- Sites that had storage and/or release of contaminants that are excluded from the CERCLA process. Investigation and/or remediation may be undertaken pursuant to other state or federal authority. For example, leaking underground petroleum hydrocarbon storage tanks would fall under the present underground storage tank (UST) program at Fort Ord and would be regulated under state and local agencies (DTSC, RWQCB, County of Monterey).
- Sites where no release to the environment has occurred. An example of this type of site would include sites where compounds, such as asbestos in buildings, has not been released to the environment (outdoors). Such sites would be handled on a site-by-site basis in accordance with the intended reuse scenario, and/or under other state or federal authorities.

If a site contains both CERCLA and non-CERCLA regulated contaminants' it could not be included as a Category 2 site, but may be a Category 1 site if it satisfies those requirements.

## **2.7 Summary of Site Risks**

The primary rationale for the designation of Category 1 sites is that they do not contain concentrations of chemicals above PRGs and are therefore protective of human health. In addition, an ecological assessment is conducted to ensure protection of the environment. For Category 2 sites, no releases have occurred under CERCLA authority and they are either protective of human health and the environment or risks associated with any non-CERCLA

substances would be addressed under separate authority.

### **2.7.1 Human Health Considerations**

The overall screening criterion for a No Action Site is an acceptable level of protection for human health and the environment. This acceptable level of protection requires that the reasonable maximum risk of exposure for a person to site-related chemicals results in an estimated additional risk of developing cancer of less than one-in-one million, and is without appreciable risk of deleterious noncancer health effects. This is in accordance with the National Contingency Plan (NCP) and CERCLA guidance.

Category 1 sites would require documentation that concentrations of contaminants at the site are below PRGs (Table 1), as set and agreed to by the State and Federal regulatory agencies. Because the screening criteria for Category 2 sites are: no release occurred, or contaminants found are excluded from CERCLA jurisdiction, these sites would automatically qualify for No Action without further analysis (e.g., comparison to PRGs).

PRGs were developed in accordance with the procedures described in the Draft Final Technical Memorandum, Preliminary Remediation Goals, Fort Ord, California dated June 24, 1994. In general, separate PRGs were developed for chemicals based on possible cancer and noncancer health effects. PRGs based on cancer risk represent chemical concentrations in soil that might result in estimated human daily intakes (doses) associated with an estimated one-in-one million probability that an exposed individual would develop cancer.

PRGs based on noncancer health effects represent chemical concentrations considered to result in estimated human daily doses expected to be without appreciable risk of adverse noncarcinogenic effects (hazard quotient of 1 or less). The lowest PRG for a chemical will be used to evaluate the need for further action or investigation at sites containing that chemical in soil; i.e., if concentrations of chemicals at a site are below PRGs, no action would need to be taken to protect human health and the environment. Chemical specific PRGs and environmental concentration data for each site will be used to evaluate that contributions of site chemicals to cumulative area-related health risks are acceptable.

The methods used to calculate PRGs generally employed conservative assumptions consistent with EPA and Cal/EPA risk-management policies for sites with future unrestricted use. Conservative EPA-developed models and EPA default assumptions were used where site-specific information was unavailable, and agency-established toxicity values (reference doses and slope factors) were used. The PRGs were designed so that uncertainties would tend to cause overestimation of actual exposures and toxicity, and thus provide PRGs protective of human health.

### **2.7.2 Protection of Groundwater**

In addition, No Action sites will be evaluated for potential impact to groundwater. The PRGs for chemicals based on human health discussed above will be evaluated to determine that State and Federal Maximum Contaminant Levels in groundwater will not be exceeded.

As discussed in the Technical Memorandum:

Approach to Evaluating Potential Groundwater Quality Impacts, dated July 29, 1993, organic compounds in the soil within the unsaturated zone will be evaluated using an USEPA-developed partitioning mass transport model (VLEACH). This model will use groundwater depth and soil characteristics specific to a preliminarily identified No Action site to estimate potential maximum groundwater chemical concentrations for given chemical soil concentrations. PRGs for organic chemicals based on human health exposures discussed above will be evaluated using this

model to ensure that state and federal primary maximum contaminant levels (MCLs) in groundwater will not be exceeded. Pesticide- and metal-contaminated soil will be assessed qualitatively to determine potential impacts to groundwater quality.

Concentrations of chemicals below PRGs, such as those found at Category 1 sites, are not expected to have an impact on groundwater quality.

### **2.7.3 Ecological Considerations**

Preliminary Hazard Assessments for ecological risk indicate that the majority of the preliminarily identified No Action sites do not pose ecological risks because the areas are already disturbed (paved). The results of the ecological risk assessment will be included in the Approval Memorandum for each site (Plate 2) to verify that these sites do not pose a risk to the environment.

### **2.8 Approval Process for No Action**

Following this ROD, an Approval Memorandum will be prepared for each proposed No Action site to demonstrate that the area meets appropriate requirements and conditions of Category 1 or 2. Each Approval Memorandum will be made available by the Army to the public, local and county agencies, the Restoration Advisory Board, U.S. EPA, and the California Environmental Protection Agency, including DTSC and RWQCB for review.

For Category 1 sites, the Approval Memorandum will include:

- 1) A description of the site and its geologic conditions with reference to appropriate completed site characterization, interim action confirmation, and removal action reports.
- 2) A map of the site detailing location and any posted chemical or other pertinent available data (e.g., groundwater chemistry).
- 3) A table of site-related chemical concentrations and their respective PRGs.
- 4) An evaluation of potential impacts to groundwater.
- 5) Results of the ecological risk assessment.

For Category 2 sites, the Approval Memorandum will include:

- 1) A description of site conditions
- 2) Data related to investigation and/or remedial actions, if applicable (e.g., asbestos surveys, UST removal records).

The Approval Memorandum will serve as a decision document for the transfer of property, and will be prepared prior to the Base Wide Record of Decision. Following a 30-day public review and comment period, the Army will forward the Approval Memorandum, public comments, and response to comments to the agencies for final review and approval. Agency review of the Approval Memorandum will be completed within 10 working days of its submittal unless extended pursuant to the FFA. Agency approvals will be confirmed in subsequent written correspondence from the agencies. Agency denial of a No Action Approval Memorandum may be disputed pursuant to Section 12 (Dispute Resolution) of the FFA.

When the Army receives approval of a No Action site determination, a notice will be placed in a major local newspaper. Completed and planned No Action site activities will also be described in newsletters, prepared for local residents by the Presidio of Monterey.

## **2.9 Documentation of Significant Change**

As described in the Responsiveness Summary, the No Action Proposed Plan was released for public comment on September 15, 1994, and a public meeting was held on September 22, 1994. This Proposed Plan identified No Action as the selected remedy for two categories of sites at Fort Ord. At the request of the public, the comment period was extended to November 21, 1994. Comments collected over the 66-day public review period between September 15, 1994 and November 21, 1994 resulted in a modification to the Approval Memorandum procedures outlined in the Proposed Plan. The approval process was amended to allow for a 30-day public review and comment period on each Approval Memorandum. No new category of sites beyond those described in the ROD and Proposed Plan have been identified at this time.

### **3.0 RESPONSIVENESS SUMMARY**

#### **3.1 Overview**

This Responsiveness Summary provides a summary of the public comments and concerns regarding the No Action Proposed Plan at Fort Ord, California.

On the basis of the verbal and written comments received, the Army's Proposed Plan for No Action was generally accepted by the public. However, some citizens and/or organizations expressed concern regarding the level of public involvement in the review and approval process for the No Action sites.

#### **3.2 Background on Community Involvement**

The Army has implemented a progressive public relations and involvement program for environmental activities at Fort Ord. The Advance, published by the Army, is a newsletter, sent to the public, that highlights the status of ongoing and planned remedial activities at Restoration Advisory Board meetings to involve the public in decisions made regarding remedial actions. In addition, a toll-free 800 number is available for concerned citizens to comment and receive answers regarding the environmental restoration and transfer of Fort Ord property.

The Army held a public comment period on the No Action Proposed Plan from September 15, 1994 through November 21, 1994. Over 700 copies of the Proposed Plan were mailed for public review and comment to interested parties and were placed in the Chamberlain Library, Building 4275, North-South Road, Presidio of Monterey Annex, California and Seaside Branch Library, 550 Harcourt Avenue, Seaside, California. This Proposed Plan also invited readers to a public meeting to voice their concerns.

The September 22, 1994 public meeting was held to discuss the screening and approval process for the No Action sites.

No comments were received from the public regarding the proposed No Action process prior to the publication of the Proposed Plan and the start of the comment period. Comments received during the comment period are addressed below.

#### **3.3 Summary of Comments Received during the Public Comment Period and Department of the Army Responses**

The public comment period on the No Action Proposed Plan was held from September 15, 1994 to October 15, 1994. A thirty-six day extension of this comment period, to November 21, 1994, was granted to the public at their request. Concerns from the general public on the proposed No Action process were raised at the Public Meeting (held on September 22, 1994) regarding the level of public involvement in the development and approval of the No Action sites. These questions and comments were addressed during the public meeting.

Four written letters were received from the general public during the public comment period. One written letter from California Coastal Commission (CCC) regarding specific technical questions was received during the public comment period. The letter from the CCC expressed concern with the identification of No Action sites in the coastal zone, the criteria for identifying No Action sites and the review and comment period for a No Action Approval memorandum.

Comments from the local community that were not sufficiently addressed during the public meeting

are summarized and addressed according to their topics in the following sections of this document. Response to the specific technical issues raised by the state agencies is also presented.

### **3.3.1 Summary and Response to Local Community Concerns**

Comments from the local community were voiced at the Public Meeting, and are summarized and addressed below. Four written comments were received from the local community during the public comment period.

#### 3.3.1.1 Public Comments Regarding Community Relations

Comment: The public meetings aren't adequately advertised to the general public.

Army Response: The public meeting was advertised in the Proposed Plan and in the Monterey Herald on September 16, 17, and 18th before the scheduled meeting date. In addition, the public meeting was advertised in the California on September 16, 17, and 19th.

Comment: The meetings should be held closer to Fort Ord instead of in Salinas.

Response: In the past, public meetings related to the cleanup at Fort Ord have been held in Monterey. At the request of the Restoration Advisory Board and the regulatory agencies to involve all potential areas that have an interest in the cleanup at Fort Ord, the No Action public meeting was held in Salinas, which is the county seat for Monterey County.

### **3.2 Summary and Response to Written Specific Technical Questions**

One written comment letter was received during the Public Comment period from the California Coastal Commission concerning the identification of No Action sites in the coastal zone, the criteria for identifying No Action sites and the review and comment period for a No Action Approval memorandum.

#### 3.3.2.1 Reprint of, and Army Response to, the Letter Received from California Coastal Commission

Staff of the California Coastal Commission has reviewed the Superfund Proposed Plan for preliminarily identified No Action (NOFA) sites, and offers the following comments.

##### NOFA Sites in the Coastal Zone

As expressed in previous comment letters dated May 13, 1994, July 7, 1994, and October 28, 1994, Commission staff has many concerns regarding the Army's evaluation of hazardous waste sites in the coastal zone and their impacts on coastal resources. We are alarmed at the proposed plan's preliminary identification of the Beach Stormwater Outfalls (Site 4) and the Ord Village Sewage Treatment Plant (Site 1) as sites which require no further action.

At the September 22, 1994 public hearing regarding the NOFA proposed plan, Commission staff expressed concerns regarding the preliminary identification of the storm drains (Site 4) as a NOFA site. In response, the Army clarified that Site 4 was no longer being considered as a NOFA site, and that remedial action would be undertaken. Written clarification of the current status of Site 4 should be provided.

Commission staff remain concerned that inadequate investigations have been undertaken at Site 1 in order to quantify and evaluate contamination which may adversely impact human health and environmental resources (please refer to our comments on the draft Remedial Investigation/ Feasibility Study dated October 28, 1994). More thorough investigations and analyses should be provided prior to classifying this coastal zone site as requiring No Further Action.

#### NOFA Criteria

The NOFA Proposed Plan describes NOFA sites as sites where remedial action is not necessary to protect human health or the environment (Category 1), or where CERCLA does not provide the appropriate authority to take remedial action (Category 2). In order to qualify as a Category 1 site, the proposed plan states: "the level of contamination that exists at a site must be below the level required for protection of human health (e.g., Preliminary Remediation Goals [PRGs]) and the environment" (page 2).

Commission staff is concerned that the criteria for qualifying as a Category 1 NOFA site has not been adequately identified. The PRGs listed in Figure 3 of the Proposed Plan may not be adequate to identify potential threats to human health, due to the fact that a PRG has not been identified for contaminants such as fecal coliform bacteria, total chromium, total polycyclic aromatic hydrocarbons (PAHs), 4,4'-DDD, e,e'-DDE, and polychlorinated biphenyls (PCBs). The NOFA process should include remediation goals for all chemicals of potential concern detected at each site and provide comparisons of detected levels with remediation goals which are protective of environmental resources as well as human health. As indicated in our comment letter of October 28, 1994, many of the PRGs exceed the Probable Effects Levels (PELs) for sediment impacts on coastal and marine resources (in some cases by 2 orders of magnitude), and therefore do not provide an acceptable basis for evaluating potential sediment impacts on coastal and marine resources.

#### NOFA Process

The proposed plan states: "An Approval Memorandum will be prepared for each proposed No Action site to demonstrate that the area meets appropriate requirements and conditions. Each Approval Memorandum will be submitted by the Army to the U.S. EPA, and the California Environmental Protection Agency, including DTSC and RWQCB for review and approval . . . Agency review will be completed within 10 working days of its submittal" (page 6).

Commission staff is concerned that the proposed process does not incorporate an acceptable level of public participation. In addition to the governmental agencies involved in the disposal and reuse of Fort Ord, members of the public and their representatives at the Restoration Advisory Board (RAB) should have the opportunity to review and comment on a draft Approval Memorandum for each NOFA site. The Army should formally respond to submitted comments in a final Approval Memorandum for each NOFA site. The proposed review period of 10 days is much too short to allow for thorough public review, and a minimum 30 day comment period should be provided.

In addition, the proposed plan states: "When the Army receives approval of a No Action site determination, a notice will be placed in a major local newspaper" (page 6). In order to allow for public input into the decision making process, notice that a site is being considered for No Further Action should be placed in more than one. In summary, Commission staff has concerns regarding the preliminary identification of coastal zone Site 1 as requiring No Further Action, and request written clarification regarding the status of Site 4. Commission staff is also concerned that the criteria for qualifying as a Category 1 NOFA site identified by the proposed plan does not adequately protect human health and the environment, as Preliminary Remediation Goals are incomplete and do not adequately protect coastal zone resources. Furthermore, Commission staff believe that the NOFA proposed plan should be revised in a manner which will

maximize public participation and ensure that public concerns are adequately addressed.

Army Response to Comments from the California Coastal Commission

The Army has responded to each of the CCC comment letters with additional information and clarification regarding the site characterization of areas within the Coastal zone. The Army would like to reiterate that each site considered for No Action under CERCLA will be evaluated during the approval memorandum process. If a site is approved for no action under CERCLA, it does not preclude the implementation of other actions that may be required under federal, state, and local regulations.

At the public meeting on September 22, 1994, the Army indicated that the evaluation of Site 4 (beach stormwater outfalls) is being performed under the basewide stormwater assessment. The results of the basewide evaluation will determine if any remedial action at the outfalls will be required. However, it does not indicate that remedial action will be undertaken as stated by CCC.

The Army has stated in the Proposed Plan that the overall screening criterion for a No Action site is an acceptable level of protection for human health and the environment. The preliminary remediation goals (PRGs) were developed on a chemical specific basis for cancer and non-cancer health effects. All chemicals detected at a site will be screened against a chemical specific PRG. The Proposed Plan states in the footnote to Figure 2 that PRGs not listed will be established according to the approved procedures as described in the PRG Technical Memorandum dated June 15, 1993. The CCC comment letter of October 28, 1994 was providing comment on the Draft Basewide RI/FS report and not the No Action Proposed Plan. However, the Army again emphasizes that an ecological risk evaluation will use appropriate screening criteria (such as Probable Effects Levels) where applicable, and be performed for each No Action site.

The Army has encouraged public involvement and implemented several progressive public relations programs for environmental activities at Fort Ord. To that end, the Army will modify the approval memorandum process for No Action sites to provide the public with an opportunity for review and comment on the each Approval Memorandum.

The modified memorandum process will consist of the following:

For each No Action site, the Army will submit an Approval Memorandum for a 30 day public review and comment period. Following public review and comment, the final Approval Memorandum, public comments, if any, and response to public comments will be submitted to the USEPA and the California Environmental Protection Agency, including DTSC and RWQCB. Agency review of the Approval Memorandum will be completed within 10 working days of submittal unless extended pursuant to the FFA. Agency approvals will be confirmed in subsequent written correspondence from the agencies. Notice of a No Action site determination will be placed in a major local newspaper.

TABLE

**Table 1. Preliminary Remediation Goals  
No Action Record of Decision  
Fort Ord, California**

Chemical	Lowest PRG*	Based on Noncancer Health Effects			Based on Carcinogenesis	
		Child Resident	Adult Resident	Construction Worker	Adult Resident	Construction Worker
Acenaphthene	960	960	4,600	31,000	NA	NA
Acetone	220	220	900	8,200	NA	NA
Aldrin	0.011	0.48	2.3	1.6	0.011	2.6
Anthracene	3300	3300	15000	110000	NA	NA
Antimony	27	27	290	57	NA	NA
Arsenic	0.87	20	220	44	0.87	60
Barium	1000	1,000	4,700	4,100	NA	NA
Benzo(a)anthracene	0.15	NA	NA	NA	0.15	37
Benzo(a)pyrene	0.015	NA	NA	NA	0.015	3.7
Benzo(b)fluoranthene	0.15	NA	NA	NA	0.15	37
Benzo(k)fluoranthene	1.5	NA	NA	NA	1.5	370
Benzo(ghi)perylene	640	640	3100	2100	NA	NA
Beryllium	0.39	340	3,700	730	0.39	28
Bis(2-ethylhexyl)phthalate	13	320	1,500	1,000	13	3,200
Bromoform	7.6	63	260	2400	7.6	2,300
Butylbenzylphthalate	3200	3200	15000	100000	NA	NA
Cadmium	8.1	34	370	73	8.1	380
Carbon disulfide	0.96	0.96	3.9	3.7	NA	NA
Carbon tetrachloride	0.025	29	190	750	0.025	8.6
Chlordane	0.14	0.97	4.6	3.2	0.14	34
Chlorobenzene	12	12	50	470	NA	NA
Chloromethane	0.12	NA	NA	NA	0.12	40
Chromium III	67000	67000	720000	/a/	NA	NA
Chromium VI	0.23	7.2	30	38	0.23	11
Chrysene	15	NA	NA	NA	15	3700
Cobalt	2000	3700	20000	2000	NA	NA
Copper	2,500	2,500	27,000	5,300	NA	NA
4,4'-DDD	0.74	NA	NA	NA	0.74	190
4,4'-DDE	0.53	NA	NA	NA	0.53	130
4,4'-DDT	0.53	8.0	38	26	0.53	130
Dibromochloromethane	0.13	22	90	840	0.13	43
Di-n-butylphthalate	1600	1600	7700	52000	NA	NA
1,3-Dichlorobenzene	330	330	1800	1200	NA	NA
1,2-Dichloroethane	0.074	NA	NA	NA	0.074	26
Dieldrin	0.011	0.80	3.8	2.6	0.011	2.8
Diethylphthalate	13000	13000	61000	420000	NA	NA
Endosulfan II (beta)	96	96	460	310	NA	NA
Endosulfan sulfate	96	96	460	310	NA	NA
Ethylbenzene	830	830	3,700	3,900	NA	NA
Fluoranthene	640	640	3100	21000	NA	NA
Fluorene	640	640	3,100	21,000	NA	NA
gamma-BHC (Lindane)	0.14	4.8	23	160	0.14	34
Heptachlor	0.031	8.0	38	26	0.031	7.8
Heptachlor epoxide	0.014	0.21	1.0	0.68	0.014	3.4
Indeno(1,2,3-cd)pyrene	0.15	NA	NA	NA	0.15	37
Lead (a)	240	240	3,900	460	NA	NA
Mercury	20	20	210	41	NA	NA
Methylene chloride	0.90	260	1100	950	0.90	310
Methyl ethyl ketone	620	620	2,900	3,300	NA	NA
2-Methylnapthalene	640	640	3,100	2,100	NA	NA
4-Methyl-2-pentanone (MIBK)	74	74	400	2800	NA	NA

**Table 1. Preliminary Remediation Goals  
No Action Record of Decision  
Fort Ord, California**

Chemical	Lowest PRG*	Based on Noncancer Health Effects			Base on Carcinogenesis	
		Child Resident	Adult Resident	Construction Worker	Adult Resident	Construction Worker
Naphthalene	640	640	3,100	2,100	NA	NA
Nickel	130	1,400	15,000	2,900	130	6,300
PCBs	0.02	NA	NA	NA	0.02	5.8
Pentachlorophenol	1.5	480	2300	1600	1.5	370
Petroleum Hydrocarbons (b)	500	(c)	(c)	(c)	500	120,000
Phenanthrene	640	640	3,100	2,100	NA	NA
Pyrene	480	480	2,300	16,000	NA	NA
Selenium	340	340	3,600	710	NA	NA
Silver	340	340	3,600	710	NA	NA
2,3,7,8-TCDD	1.20E-06	NA	NA	NA	1.20E-06	3.00E-04
1,1,2,2-Tetrachloroethane	0.28	NA	NA	NA	0.28	68
Tetrachloroethylene	0.16	410	2,700	11,000	0.16	54
Thallium (as Thallic oxide)	4.7	4.7	50	100	NA	NA
Toluene	190	190	770	3,700	NA	NA
1,2,4-Trichlorobenzene	49	49	210	710	NA	NA
1,1,1-Trichloroethane	200	200	1100	7600	NA	NA
Trichloroethene	1.1	NA	NA	NA	1.1	270
Vanadium	470	470	5,000	1,000	NA	NA
Xylenes	130	130	520	500	NA	NA
Zinc	20,000	20,000	210,000	42,000	NA	NA

\* All PRGs are in milligrams per kilogram, and are taken from the: Draft Final Technical Memorandum, Preliminary Remediation Goals, Fort Ord, California. Dated June 24, 1994. Prepared by HLA for the Sacramento COE. These PRGs were developed according to procedures described in: Risk Assessment Guidelines for Superfund, Volumes 1 and 2. Prepared by the Office of Emergency and Remedial Response, EPA documents EPA/540/1-89/006 and EPA/540/1-89/001

(a) Draft Final Basewide Background Soils Investigation. Dated March 15, 1993 Prepared by HLA for the Sacramento COE.

(b) This PRG is based on maximum concentrations of individual carcinogenic and non-carcinogenic constituents in used motor oil and was developed for use at petroleum hydrocarbon sites where SOC analyses were not available.

(c) Calculated value exceeds 100 percent of soil, indicating noncancer health effects would not be expected at any soil concentration.

PRG = Preliminary Remediation Goal.

mg/kg = Milligrams per kilogram

NA = Not available.

PLATES

<IMG SRC 0995138>

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