

OU2 - 490

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD --  
CENTRAL COAST REGION  
81 Higuera Street, Suite 200  
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Roger W. Briggs  
Executive Officer



October 22, 1996

Edward A. Botsford  
Box 4293  
Carmel, CA 93921-4293

Dear Mr. Botsford:

***DoD - FORT ORD; PUBLIC COMMENTS REGARDING THE FORT REUSE PLAN***

We are responding to an October 7, 1996 letter regarding the Fort Ord Disposal and Reuse Environmental Statement document, received October 15, 1996. Your letter requests comments to three primary concerns. Your concerns are summarized and followed by our comments.

1. The "creation" of a Corrective Action Management Unit at the Operable Unit 2 (OU-2) landfill should be considered a "fundamental" change.

This comment implies that a separate waste disposal area (besides the existing landfill) has been or will be created. For clarification purposes, the Corrective Action Management Unit is a "designation" not a separate entity. The Corrective Action Management Unit and the OU-2 landfill are the same entity.

Further, the Army (as lead agency) has determined that designating the OU-2 landfill as a Corrective Action Management Unit is a "significant" not a "fundamental" change. The United States Environmental Protection Agency (as lead federal agency), the Department of Toxic Substances Control (as lead State agency) and the Regional Water Quality Control Board (as a responsible State agency) concur with the Army's determination. Thus, the Corrective Action Management Unit designation is being addressed by developing an Explanation of Significant Differences document. Once developed and approved (expected within a few weeks), the Explanation of Significant Differences will be released to the public. Objection to the "significant" change should be directed to the Army.

2. The draft environmental document does not discuss the creation of a Corrective Action Management Unit at the OU-2 landfill. Thus, the next environmental document prepared by FORA must include information regarding this subject.

For your information, any comments pertaining to the environmental document should be addressed directly to Mr. Bob Verkade, Sacramento District Corps of Engineers (CESPK-ED), 1325 J Street, Sacramento, CA 95814-2922; (916) 557-7423. As Hector Hernandez of my staff informed you via a telephone message on October 18, 1996, the comment period for the June 1996 environmental document titled, "Final, Supplemental Environmental Impact Statement, Fort Ord Disposal and Reuse" ends on October 21, 1996.

Designation of the OU-2 landfill as a Corrective Action Management Unit is addressed in the Basewide Remedial Investigation Sites and Site 3, Beach Trainfire Ranges Record of Decision documents. In addition, the Army has prepared a fact sheet to provide information regarding the waste consolidating process. The fact sheet is titled, "Remediation Waste Consolidation Fact Sheet" and is dated October 1996. The fact sheet contains information about the OU-2 landfill, a description of the Corrective Action Management Unit designation process, and information on opportunities for public involvement, and how to obtain more information about the proposed Corrective Action Management Unit designation. Further, as mentioned above, an Explanation of Significant Differences document is being developed to specifically address the Corrective Action Management Unit designation.

3. The golf course (depicted on the environmental document's polygon 8a) which is planned on the OU-2 landfill area, must be deleted from consideration in the next environmental document and removed from the Fort Ord Reuse Plan.

Again, specific comments regarding the environmental document should be addressed to Mr. Bob Verkade.

We have enclosed a copy of an October 18, 1996 Regional Board comment letter regarding the "Final, Supplemental Environmental Impact Statement, Fort Ord Disposal and Reuse, June 1996" document. Our letter addresses the development of a golf course at the OU-2 landfill.

If you have any questions regarding this letter, contact Hector Hernandez (805) 542-4641.

Sincerely,



~~Mr.~~ Roger W. Briggs  
Executive Officer

Enclosure: Regional Board's October 18, 1996 letter titled, "DoD - Fort Ord; Final, Supplemental Environmental Impact Statement, Fort Ord Disposal and Reuse, June 1996."

c: See next page

c: Mr. John Adams  
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P.O. Box 944212  
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Fort Ord Reuse Authority  
100 12th Street, Building 2880  
Marina, CA 93933

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State of California

## MEMORANDUM

To: Bill Kilgore Date: October 18, 1996  
Department of Toxic Substances Control, Region 1  
10151 Croydon Way, Suite 3  
Sacramento, CA 95827



From: ~~for~~ ROGER W. BRIGGS, Executive Officer  
California Regional Water Quality Control Board  
Central Coast Region - 81 Higuera St., Suite 200  
San Luis Obispo, California 93401-5414

Subject: *DoD - FORT ORD; FINAL, SUPPLEMENTAL ENVIRONMENTAL  
IMPACT STATEMENT, FORT ORD DISPOSAL AND REUSE, June  
1996*

Thank you for providing us the opportunity to review the subject environmental document, prepared by the U.S. Army Corps of Engineers and received September 13, 1996. We understood the comment period ends October 21, 1996. Our primary responsibility is water quality protection. As such, our review and comments are limited to water quality related issues. Based on our review, we offer the following comment:

We concur with statements outlined in the subject document (Section 5.3.3) and a March 4, 1996 correspondence from DTSC (Appendix F, Section 3.0, Page F3-20, Comment #1) regarding Alternative 8. The proposed golf course is not consistent with the approved landfill remedial plan and the landfill closure and post closure maintenance plan. The landfill cap design does not anticipate golf course uses or the land modifications and irrigation that would be needed to support golfing. The approved closure and post-closure maintenance plan includes design details for the final landfill cover system designed for nonirrigated open space only. If the landfill is to be used for irrigated purposes (i.e., golf course) then the final cover design, including the approved final closure and post-closure maintenance plan may necessitate revision and formal approval must be obtained from the appropriate Local, State and Federal Agencies, including the Regional Board.

In summary, if the landfill is to be used for irrigated purposes, compliance with applicable landfill regulations including California Code of Regulations, Title 23, Division 3, Chapter 15 (Chapter 15) must be achieved. Specifically, Chapter 15 states:

"If the waste management unit [OU 2 landfill] is to be used for purposes other than nonirrigated open space during the post-closure maintenance period, the discharger [Army] shall submit a map showing all proposed structures, landscaping and related features to be installed and maintained over the final landfill cover. This map shall be at a scale of 1" = 100' and shall be accompanied by:

- (1) A description and quantification of water entering, leaving, and remaining on-site from all sources to determine potential adverse impacts that will ensure the physical and hydraulic integrity of the final cover.
- (2) Detailed design plans and description(s) of the monitoring system(s) that will effectively detect penetration of the final cover by precipitation or applied irrigation waters."

We have no additional comments at this time.

Please note this memorandum is being transmitted to several interested parties. Until the Department of Toxic Substances Control (DTSC), as the lead State agency, submits formal comments, this memorandum may not be considered final.

If you have any questions, please contact Hector Hernandez at (805) 542-4641 or Eric Gobler at (805) 549-3467.

c: Gail Youngblood Base RPM  
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