

# FOEJN Public Comment

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# FOEJN – who we are

- FOEJN is the recipient of the US EPA TAG funding to represent the community in the Fort Ord cleanup.
- Our interests are the health, welfare and well being of the community members in the greater Fort Ord area.
- We have participated in the cleanup process from the beginning with numerous comments and public forums

# The Proposed Plan

- We reviewed two drafts of the Remedial Investigation and Feasibility Study for this group of properties.
- Our technical advisor, Dr. Peter L. deFur reviewed the RI/FS and the proposed plan
- FOEJN has several problems with the proposed plan

# Problems With the Proposed Plan

- No sampling for heavy metals and other contaminants was included in the original remedial investigation
- Future uses in some areas may involve activities that require digging below the deepest removal actions
- The plan makes no mention of the Agreed Order on Consent (AOC) that would transfer these properties to the Fort Ord Reuse Authority

# Other problems with the PLan

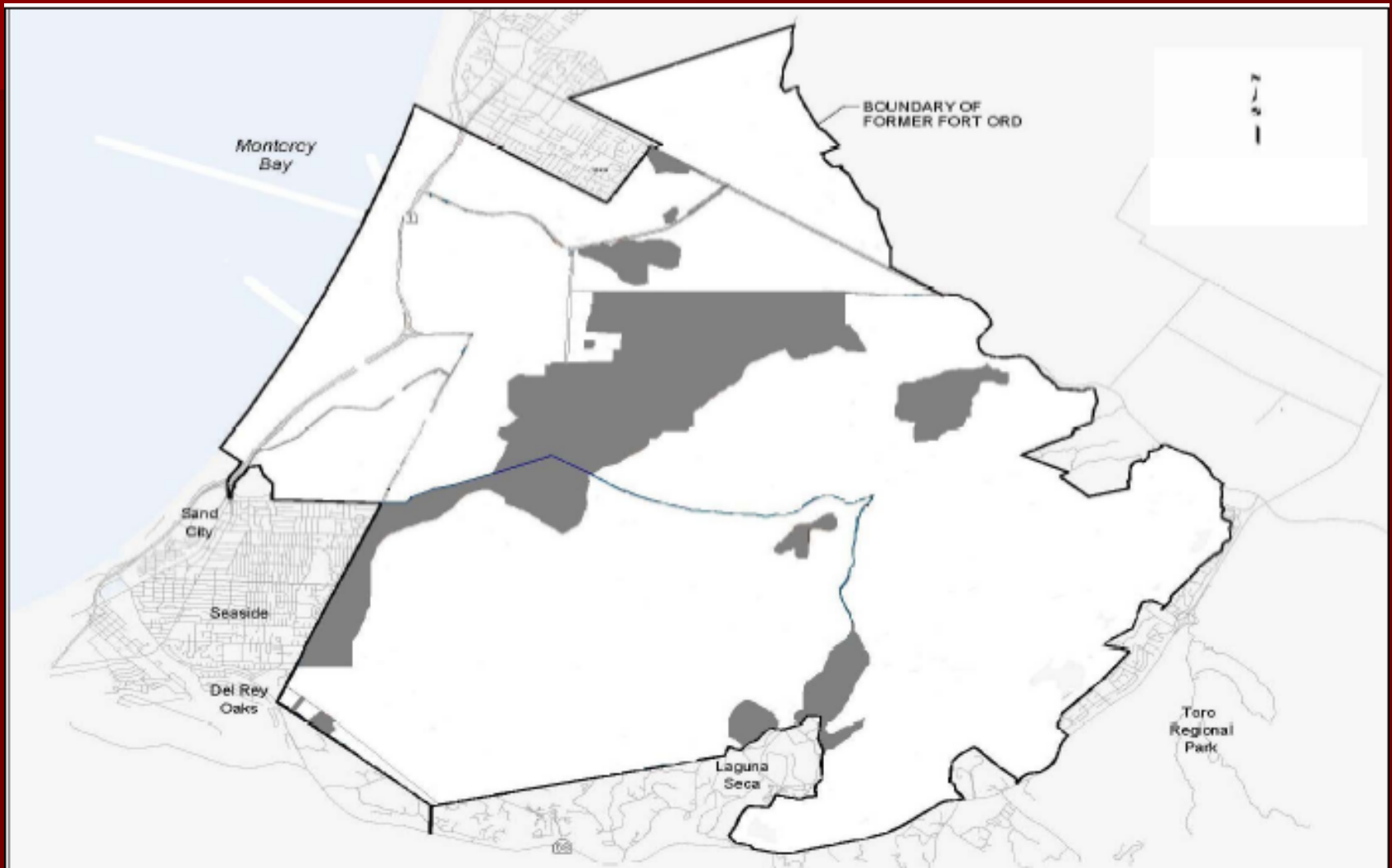
- Munitions and explosives of concern may remain in large areas of the properties. The Army contractors used equipment that does detect deeper objects. Standard practice was to bury unexploded ordnance in deep holes- these deeper holes would not be detected.
- The detection equipment did not detect all the test objects.

# Implications For the Rest of Fort Ord

- Parker Flats is just a fraction of the over 3,000 acres of Track 2 sites on Fort Ord
- Other areas have many of the same problems
- Parker Flats would be transferred along with most of these other areas to FORA under the proposed Agreed Order on Consent before investigations and cleanups have been fully performed



# Sites to be Transferred to FORA



# Recommendations

- Require training for longer than 5 years
- Repeat the quality assurance
- More than 10% resurvey
- Some areas need geophysical investigations that are deeper than 4 feet
- Soil testing for metals and chemical breakdown products
- Not transfer to FORA