

APPENDIX C

# Real Estate Map HAAF 1948

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## **Responses to Comments**

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**Responses to Comments on the  
POL Hill and Hospital Hill EBS and FOST, Hamilton Army Airfield  
(January 2001)**

No.	Comments	Responses
<b>DTSC Comments June 26, 2001</b>		
1.	EBS Section 1.1, <i>Background</i> , indicates “The Army has proposed no further action, allowing for natural attenuation of residual contamination at POL Hill.” The text should be revised to clarify that natural attenuation is not the same as “no further action.” Monitoring would also be needed in order to determine whether natural attenuation is successful.	The EBS has been revised to indicate the Army is in the process of preparing a closure report specifically for the tank farm area of POL Hill. Based on site conditions, the closure report will recommend no further action for the tank farm area. The EBS has also been revised to indicate the Army is in the process of preparing a Corrective Action Plan for the AST 2 area of POL Hill. Based on site conditions and available information, the Corrective Action plan will recommend natural attenuation and monitoring as the selected remedy for the AST 2 area.
2.	In January 2000, the Army submitted the Closure Report for POL Hill. On June 5, 2000, the RWQCB commented on the Closure Report, indicating quarterly sampling of the monitoring wells was needed to confirm whether natural attenuation is taking place. On February 15, 2001, the Army replied that no further monitoring was needed to determine whether natural attenuation was taking place, but that annual monitoring of the wells near AST-2 would be conducted. However, samples have not been collected from the wells since September 1998, suggesting that up-to-date information on the quality of the groundwater is lacking.	The Army and the RWQCB agree that the current information available is sufficient to demonstrate that monitored natural attenuation is a viable option at this site. The Army and the RWQCB have agreed on the monitoring requirements necessary to support this effort. No additional data collection beyond the agreed upon monitoring is anticipated for this site. The required monitoring will be documented in the Corrective Action Plan.
3.	Closure Report Figure 5-1 provides the results of monitoring for methane. The highest concentration of methane detected is 2.8 mg/L. This concentration could present a hazard in the event methane gas were to leave the groundwater and enter a structure. It is recommended gas control and monitoring systems be included in any structures on the site or adjacent properties that might be affected. Soil gas monitoring, including using a combustible gas indicator (CGI), should be conducted. California Code of Regulations, Title 8,	This highest concentration represents an extremely small total mass of methane. The concentrations drop off by orders of magnitude within 100 feet of this sample location and the methane is present in groundwater, which at this site is only located in the bedrock fractures. The Army believes that there is not sufficient total mass of methane to make the suggested scenario plausible. As the petroleum at this site degrades the methane concentrations will decline making this scenario even

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	<p>Section 5416, <i>Flammable Vapors</i>, provides for ventilation of buildings and other enclosed spaces so that concentrations of flammable vapors do not exceed 25% of the lower explosive limit (LEL). Similarly, DTSC's standard health and safety protocol requires its employees to withdraw from areas containing concentrations greater than 10% of the LEL. It is recommended remedial action be implemented whenever the concentration of flammable vapors exceeds 10% of the LEL.</p>	<p>more unlikely in the future.</p> <p>DTSC's health and safety protocols are relevant to employee health and safety on the job. These standards are not promulgated as cleanup levels or thresholds for the initiation of remedial action.</p> <p>CCR Title 8 applies to proper ventilation of buildings; requirements for monitoring are not provided in this section. The groundwater treatment plant is the only existing building at POL Hill. This building is ventilated. It is assumed that any potential future buildings that may be constructed at POL Hill by future landowners would require building permits and would also be required to meet the ventilation provisions of this title.</p>
4.	<p>Knowledge of the geology and extent of contamination (both lateral and vertical) are key elements in determining whether natural attenuation is taking place. Information on these elements is incomplete.</p>	<p>The Army and the RWQCB agree that the current information available is sufficient to demonstrate that monitored natural attenuation is a viable option at this site. The Army and the RWQCB have agreed on the monitoring requirements necessary to support this effort. No additional data collection beyond the agreed upon monitoring is anticipated for this site. The required monitoring will be documented in the Corrective Action Plan.</p>
5.	<p>EBS Section 2.3, <i>Aerial Photographs</i>, indicates aerial photographs were not reviewed as part of the investigation, since aerial photographs were reviewed as part of the 1994 CERFA report. During a March 28, 2001 site visit, it appeared the recent housing construction activities may have encroached on the POL Hill property. Review of aerial photographs and comparison of the residential area land survey results to the POL Hill property boundaries is recommended.</p>	<p>The property boundaries were surveyed before the new housing construction activities began. The housing and construction activities adjacent to POL Hill do not encroach onto POL Hill property.</p>
6.	<p>EBS Figure 3-2, <i>Site Map: Hospital Hill</i>, includes a dashed line showing the Hospital Hill Parcel Boundary. This boundary line does not coincide with the <i>Boundary Plot, Hospital Parcel, May 1996</i>, contained in</p>	<p>The dashed line representing the Hospital Hill parcel boundary in Figure 3-2 has been removed. A more accurate</p>

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	FOST Appendix A. Please revise EBS Figure 3-2 to include the survey information contained in FOST Appendix A.	line representing the approximate boundary of Hospital Hill has been inserted. The legal description and accompanying figure depicting the actual parcel boundary is included in the FOST.
7.	EBS Table 3-2, <i>List of Past and Present Structures at Hospital Hill</i> , lists buildings at Hospital Hill, their historical uses, and their current status. During a site visit on March 28, 2001, it was noted Building 525 was used for x-rays, based on the sign above the threshold to the northern room in Building 525. As previously discussed, the results of the investigation of this area for releases associated with this activity should be provided. It should also be noted Building 525 was not locked, and the doors to Buildings 512 and 520 were open. In addition, access to Building 515 could be obtained through an open window adjacent to an outdoor stairway on the south side of the building. As previously discussed, these buildings should be secured and monitored, as access presents a danger due to asbestos and other physical hazards. EBS Table 3-2 should be also revised to incorporate the above information.	Building 525 was not used for x-ray operations as assumed during DTSC's site visit. The signs located above the doorway thresholds in each room of this building are labeled as follows: a - "alpha", e- "echo", c- "charlie" and x- "x-ray". These are phonetic alphabet names and are not related to activities conducted in the rooms. It should be further noted that x-ray operations are not usually a radiological concern since radiological source material is not normally used. No change to the document is necessary.
8.	EBS Figure 3-3, <i>Site Map - POL Hill</i> , shows the property lines not closing, and not coinciding with the fence. This boundary line also does not coincide with the POL Hill property bounds shown in <i>Ammo Hill Parcel and 800-B Parcel Boundary Plot</i> , September 21, 1999, contained in FOST Appendix A. Please revise EBS Figure 3-3 to include the survey information included in FOST Appendix A. The property lines need to close, and the relationship of the property boundaries to the site fence should be clarified. The relationship of POL Hill to adjacent property features (roads, buildings, homes, etc), and EBS Figure 3-4, <i>POL Hill Tank Farm Area</i> , should also be provided in EBS Figure 3-3.	<p>For the purposes of this EBS, the POL Hill parcel is defined to include land that is within the buffer zone of Landfill 26. However, the portion of land within the buffer zone will not be transferred as a part of POL Hill. The portion of POL Hill within the buffer zone will be retained by the Army until it can be transferred with the landfill at a later date. The legal boundaries for the impending transfer of POL Hill have been revised to exclude the land within the buffer zone. EBS Figure 3-3 has been revised to show both the approximate area of POL Hill included and evaluated in this EBS as well as the approximate boundaries of the portion of POL Hill proposed for transfer in the FOST.</p> <p>Also, EBS Figure 3-3, <i>Site Map - POL Hill</i> has been revised to close the boundary of POL Hill. However, please note that the fence line does not represent and has no correlation with the property boundary.</p>

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9.	FOST Section 2, <i>Property Description</i> , indicates Buildings 737 and 738 were historically used as maintenance buildings. The nature of the maintenance, including the types of materials used in the buildings, the potential for releases, and other relevant information should be included in the FOST.	<p>This information was available in the combined POL Hill and Hospital Hill FOST. The FOST followed the outline specified in guidance documents for preparing a FOST.</p> <p>The January 2001 FOST has subsequently been revised to separate POL/Hospital Hill parcels. The requested information will be presented in the FOST for POL Hill in accordance with guidance documents.</p>
10.	FOST Section 2, <i>Property Description</i> , indicates the Army proposes to transfer the Landfill 26 Treatment Plant to the City of Novato. It is recommended that the Landfill 26 Treatment Plant, related facilities, and adjacent property remain with the Army, and use restricted to the purpose for which it is intended.	The portion of POL Hill that overlaps the Landfill 26 buffer zone is included in the EBS but will not be included in the transfer of POL Hill. The groundwater treatment plant is located entirely within the buffer zone. Therefore, the groundwater treatment plant will be transferred at a later date along with Landfill 26. The POL Hill FOST has been separated from the Hospital Hill FOST. This comment will be included by the Army into the final FOST for POL Hill.
11.	FOST Section 3.3.1, <i>Petroleum and Petroleum Products, Underground and Above-Ground Storage Tanks, POL Hill</i> , indicates TPH-contaminated soils up to 100 ppm were removed to the extent possible (down to bedrock) from the area of the former AST 2, and near former Buildings 736, 737, and 738. Comparison of this information to the monitoring results presented in FOST Exhibit B, Figure 2, <i>Monitoring Well Locations and TPH Concentrations in Groundwater</i> , January 1999, and EBS Figure 3-3 indicates no monitoring is taking place near former Buildings 736, 737, and 738. There is also no monitoring to the south of AST 2. A full understanding of the condition of the groundwater or soils can not be ascertained from the information provided.	There is no current monitoring in the area of Buildings 736, 737 and 738 since previous groundwater samples indicated no impacts. The Army and the RWQCB agree that the current information available for the AST-2 area is sufficient to demonstrate that monitored natural attenuation is a viable option at this site. The Army and the RWQCB have agreed on the monitoring requirements necessary to support this effort. No additional data collection beyond the agreed upon monitoring is anticipated for this site. The POL Hill FOST has been separated from the Hospital Hill FOST. This comment will be included by the Army into the final FOST for POL Hill.
12.	FOST Section 3.4, <i>Polychlorinated Biphenyls (PCB) Equipment</i> , indicates Building 737 contained forty 55-gallon drums labeled as containing hydraulic oil, waste oil, waste solvent, and other unlabeled drums. There were also four 55-gallon drums labeled as containing PCBs, and three transformers stored in metal or plastic containers. This information suggests the site was used for storage of hazardous	<p>As stated in the FOST and EBS, the proper storage of hazardous materials was identified at this location. The materials were stored within the bermed area of the building. There are no reported spills or releases to the environment.</p> <p>Also, the July 3, 1998 letter from DTSC stated that only certain</p>

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	wastes. Results of investigation for releases of these types of wastes should be incorporated into the FOST, and additional investigation conducted if necessary.	petroleum issues were a concern at POL Hill. The POL Hill FOST has been separated from the Hospital Hill FOST. This comment will be included by the Army into the final FOST for POL Hill.
13.	FOST Section 4.1, <i>Remediation: Hospital Hill</i> , refers to the RWQCB's August 18, 2000 letter as stating all remediation activities on the property have been taken. This overstates the content of the August 18 letter, which only pertains to the removal of the USTs and associated contamination.	<p>The text has been revised to indicate that there were no CERCLA issues at the site and that the petroleum issues at the site that required remediation have been appropriately addressed. Per the DTSC July 3, 1998 letter regarding Hospital Hill - "...the only contamination found at this site was related to a leaking underground fuel tank." The letter goes on to state that "As petroleum hydrocarbons are not regulated as hazardous substances in the California Health and Safety Code, Division 20, Chapter 6.8, additional evaluation of this site should be conducted by the San Francisco Bay Regional Water Quality Control Board (SFRWQCB)." Since the only contamination found on the site was petroleum hydrocarbons, the RWQCB closure of petroleum issues indicates that all remedial actions have been taken.</p> <p>The Hospital Hill FOST has been separated from the POL Hill FOST. These comments will be included by the Army into the final FOST for Hospital Hill.</p>
14.	FOST Section 4.2, <i>Remediation: POL Hill</i> , indicates the chosen remedy is monitored natural attenuation (MNA). The data discussed in FOST Sections 3.3.1 and 4.2, and presented in FOST Exhibit B, Figure 2, <i>Monitoring Well Locations and TPH Concentrations in Groundwater</i> , January 1999, suggests the extent of contamination is unknown, and that the monitoring well network is not adequate to track the movement or occurrence of contamination. It is necessary to have a good understanding of this information in order to determine the viability and subsequent effectiveness of MNA. It would also be helpful if the report could be revised to consistently indicate the concentrations of TPH encountered in the groundwater. The text	<p>The Army and the RWQCB agree that the existing monitoring wells are adequate and the current information available is sufficient to demonstrate that monitored natural attenuation is a viable option at this site. The Army and the RWQCB have agreed on the monitoring requirements necessary to support this effort. No additional data collection beyond the agreed upon monitoring is anticipated for this site. The required monitoring will be documented in the Corrective Action Plan.</p> <p>Figure 2 is correct in reporting concentrations in micrograms per liter (ug/L). The text will be corrected to report</p>

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	<p>indicates concentrations up to 9,700 ppm (parts per million) are present, while Figure 2 indicates concentrations up to 9,700 ug/L (parts per billion) are present. Discussion should be provided on the extent of contamination, its fate and transport, action levels, points of compliance, and contingency plans in the event MNA is found to be ineffective in order to support a MNA approach to site remediation.</p>	<p>micrograms per liter (ppb) and not ppm. The POL Hill FOST has been separated from the Hospital Hill FOST. This comment will be included by the Army into the final FOST for POL Hill.</p> <p>Discussion on TPH extent of contamination, fate and transport, action levels, points of compliance, and a contingency plan is not within the scope of a FOST. Only remedies that will be effective will be selected; therefore, there is no need for contingency plans. The items mentioned above will be addressed in the Corrective Action Plan for AST 2 currently being prepared by the Army.</p>
15.	<p>FOST Enclosure 2, <i>Description of Property</i>, indicates Hospital Hill is classified as CERFA Category 2. The PCB data in Enclosure 4 suggests there were PCB spills, which would classify Hospital Hill as CERFA Category 3, 4, 5, 6, or 7, depending on the severity and extent of contamination.</p>	<p>As stated in the PCB Transformer Closure Report and summarized in Enclosure 6 to the FOST:</p> <p>“Any PCB contamination spills related to such equipment [at Hospital Hill] has been properly remediated prior to conveyance (i.e., transformer pads were cleaned but did not require disposal) and no surface remediation/excavation was necessary. The PCB equipment does not currently pose a threat to human health or the environment.”</p> <p>The recorded spills of PCBs at Hospital Hill were totally contained within the building and have been fully remediated. The spills did not result in releases to the environment. The Category 2 designation is appropriate at Hospital Hill since the only issues at the site are petroleum issues.</p> <p>The Hospital Hill FOST has been separated from the POL Hill FOST. These comments will be included by the Army into the final FOST for Hospital Hill.</p>

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16.	<p>FOST Enclosure 2, <i>Description of Property</i>, indicates POL Hill is classified as CERFA Category 2. As discussed above, FOST Section 3.4, <i>Polychlorinated Biphenyls (PCB) Equipment</i>, indicates Building 737 contained forty 55-gallon drums labeled as containing hydraulic oil, waste oil, waste solvent, and other unlabeled drums. There were also four 55-gallon drums labeled as containing PCBs, and three transformers stored in metal or plastic containers. This information suggests the site was used for storage of hazardous wastes, resulting in POL Hill being classified as CERFA Category 3, 4, 5, 6, or 7, depending on the severity and extent of contamination, if any.</p>	<p>As indicated in the FOST and EBS, the proper storage of hazardous materials was identified at this location. There were no reports of any PCB releases because the spills occurred within the building and did not result in a release to the environment; therefore it is not appropriate to classify POL Hill as a category 3, 4, 5, 6, or 7 because these categories require a release to the environment.</p> <p>Also, the July 3, 1998 letter from DTSC did not identify any releases other than petroleum, which is not defined as a hazardous substance. The POL Hill FOST has been separated from the Hospital Hill FOST. This comment will be included by the Army into the final FOST for POL Hill.</p>
17.	<p>FOST Enclosure 6, Section 9, <i>Notice of UXO Clearance</i>, indicates a file review was conducted to look for ordnance issues. The Army is currently conducting an Ordnance Archive Search Report for the entire installation, as outlined in DTSC's March 2, 2001 letter. The FOST and EBS should be revised to include this information.</p>	<p>The Army is not currently conducting an Ordnance Archive Search Report (ASR) for the entire installation as outlined in a DTSC letter to the FUDS program. The Army has conducted an ASR for BRAC property in response to the letter from a concerned citizen (Archives Search Report Findings Hamilton Army Airfield, September 2001). The ASR found no UXO issues at POL Hill or Hospital Hill. This is consistent with information that has already been reported.</p> <p>The Hospital Hill FOST has been separated from the POL Hill FOST. These comments will be included by the Army into the final FOST for Hospital Hill.</p>
18.	<p>FOST Enclosure 8, <i>POL Hill Groundwater Covenant</i>, contains the agreement to be executed between the Army, the RWQCB, and the DTSC.</p> <ol style="list-style-type: none"> <li>1. Article I, Statement of Facts, Paragraph 2 of Section 1.02, makes reference to a remediation plan to implement MNA and an O&amp;M plan which have not been provided to or</li> </ol>	<ol style="list-style-type: none"> <li>1. The Army is working with the RWQCB to implement a Monitored Natural Attenuation (MNA) remedy for POL Hill. The current plan was submitted to the RWQCB for review and concurrence. The first set of samples were collected in September 2001. On completion in 2002, the</li> </ol>

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	<p>approved by the RWQCB or DTSC. These are key components of the covenant, which would need to be prepared and approved prior to concurrence with the covenant.</p> <p>2. Article I, Statement of Facts, Section 1.03: The first sentence of this section is unclear.</p> <p>3. Article IV, Restrictions, Section 4.01(b): Construction dewatering of groundwater should be prohibited.</p> <p>4. Article IV, Restrictions, Section 4.01(f and g): These provisions should be extended to a distance of 1000 feet from Landfill 26.</p>	<p>Army and RWQCB will determine what additional monitoring if any is required.</p> <p>2. The first sentence has been clarified by correcting a typo. The word "were" was changed to "where".</p> <p>3. Section 1.02 has been modified to indicate construction dewatering would have to be coordinated with the appropriate agencies. However, the Army does not believe construction dewatering should be prohibited; therefore, no change to Section 4.01 is necessary.</p> <p>4. The provisions stated in Article IV are explicit to the landfill buffer zone. They are derived from the Closure Post Closure Monitoring Plan for the landfill and are not related to concerns at POL Hill. Because the property to be transferred for POL Hill now excludes the buffer zone for Landfill 26, restrictions "f" and "g" in Section 4.01 have been removed from the FOST.</p> <p>The POL Hill FOST has been separated from the Hospital Hill FOST. These comments will be included by the Army into the final FOST for POL Hill.</p>