

DRAFT

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Comments on "Draft Work Plan; Landfill Gas System Expansion; Operable Unit 2 Landfills; Former Fort Ord, California"

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Comments prepared for the Fort Ord Administrative record

These comments were prepared at the request of the Fort Ord Environmental Justice Network (FOEJN) to provide technical comment to the Army and summarize the report on landfill gas expansion for the community. FOEJN represents the affected community in the greater Fort Ord area in the clean up of contamination and ordnance related waste.

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This Draft Work Plan explains that the Army will install additional gas vents and pumps to extract and destroy the gases that are produced by the Landfill in area F. Area F is the section that was created when the Army moved the landfill from across Imjin Highway. This section of the landfill now produces methane and a number of volatile organic compounds that are poison gases.

The Army has decided that the landfill gases coming out of and underneath Area F at the Operating Unit 2 Landfill need to be collected and treated more than the present system collects and treats. This new system will add 23 new gas wells that extract the gases from the landfill. Eighteen(18)of these wells will be placed along the perimeter of the area. Especially along the north, south and western borders of the landfill. Five (5) wells will be placed in the interior of the landfill area.

None of the new wells will be placed around the remainder of the landfill areas, the older areas, labeled areas B, C, D and E.

The gases will no longer be treated by a filter system, which does not treat methane well. Instead, the gases will be burned off using a gas burner that destroys the organic compounds and the methane.

This step is a positive one for the Army to take and should result in a great reduction in the amount of gas that is released from the landfill. In addition, the use of the burner is intended to destroy the gases once collected, rather than release methane (which causes global warming).

The Work Plan notes that the present system does not operate all the time, but only 100 hours every two weeks. It is not clear why the present system is not operating all the time, but that is another matter. The new system should be operated as much as possible, with time for maintenance. During maintenance, the system should have a backup system, one that will also

provide emergency treatment in case the primary system fails or needs more than a short shutdown for maintenance.

The report refers to vinyl chloride gas. This gas is highly toxic and a serious problem for human health. Page 2-3, section 2.2. 1, item #1 refers to vinyl chloride possibly appearing in groundwater in the future. The report needs to offer more explanation of why vinyl chloride may be appearing in groundwater in the future.

Page 3-2, section 3.2.2 refers to a risk assessment that was conducted for the gas burner. The Army needs to make this risk assessment available to the public to review and comment, as it is an important part of the documentation for this work.

Page 6-3, section 6.2 states that the gas pumps will operate round the clock for a week to purge the system and pull out the gases that are now in the soil around the landfill. How does the contractor/Army know that this is a sufficient time to accomplish this extraction? The system should be measured on a greater frequency to determine with real data how the system is performing.

*Added community comments*

*Since this seems to be a new process for the greater Fort Ord community, FOEJN recommends public meetings to discuss exactly how this new plan will help to protect the health of those being affected by living on and adjacent to the landfills. We have hopes of having the landfills removed far away from housing populations and students. But, we are constantly being told this can not be done, due to budgetary reasons? In order to extract the gases produced by the landfills in area F, additional gas vents and pumps will be installed to extract the gases to where? The entire landfill need to be treated, updated and maintained. The old wells may need to be replaced.*

*How does the cost of removal compare to the cost of maintenance?*