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NAS CECIL FIELD, FL
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FINAL REVISED PROPOSED PLAN FOR OPERABLE UNIT 7 (OU 7) SITE 16 NAS CECIL FIELD FL

1/12/1999

TETRA TECH NUS INC

Installation Restoration Program

January 1999

Revised Proposed Plan

Operable Unit 7, Site 16
Naval Air Station Cecil Field
Jacksonville, Florida

Facility Description

Naval Air Station (NAS) Cecil Field (see Figure 1) was established in 1941 and provides facilities, services, and material support for Naval operations. It was added to the National Priority List (NPL) in 1989. In July 1993, the Base Realignment and Closure (BRAC) Commission recommended the closure of the base.

Site Description

Operable Unit (OU) 7 is located in the south-central portion of NAS Cecil Field (see Figure 1) and consists of Site 16, which includes the AIMD seepage pit, bead separator, holding tank, associated pipelines from Building 313, and adjacent areas (see Figure 2).

This Document

In accordance with Section 117 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the law that established the Superfund program, this document summarizes the Navy's revised proposal for site clean-up to help the public understand and comment on the proposed alternatives. This plan has been developed by the NAS Cecil Field BRAC Clean-up Team (BCT), which consists of representatives from the Navy, the U.S. Environmental Protection Agency (EPA), and the Florida Department of Environmental Protection (FDEP). This plan is a revision of that originally prepared and submitted to the public in March 1996. The BCT, in consultation with the Restoration Advisory Board (RAB) will select a new final remedy for OU 7, Site 16, after all public comments have been addressed. One of the purposes of this plan is to solicit the public's views and comments on all of the alternatives described. This plan highlights key information from the Remedial Investigation/Feasibility Study (RI/FS) report, but is not a substitute for that document. More complete information on the remedial action can be found in the RI/FS report and the administrative record.

Why is Clean-up Needed?

The Navy's studies of OU 7, Site 16 have resulted in the following conclusions:

- As a result of past disposal practices, several contaminants were found in the Site 16 soil and groundwater which could potentially be harmful to human health.
- An Interim Remedial Action (IRA) was conducted in 1994, which adequately addressed concerns associated with the soil and source area of Site 16.
- Several chemicals remain in the groundwater which could potentially be harmful to human health if this water was to be used for drinking purposes in the future. The main contributors to human health risks have been identified as chlorinated volatile organic compounds (VOCs) and metals.

The Revised Clean-up Proposal…

The original 1996 Clean-up proposal included the following components:

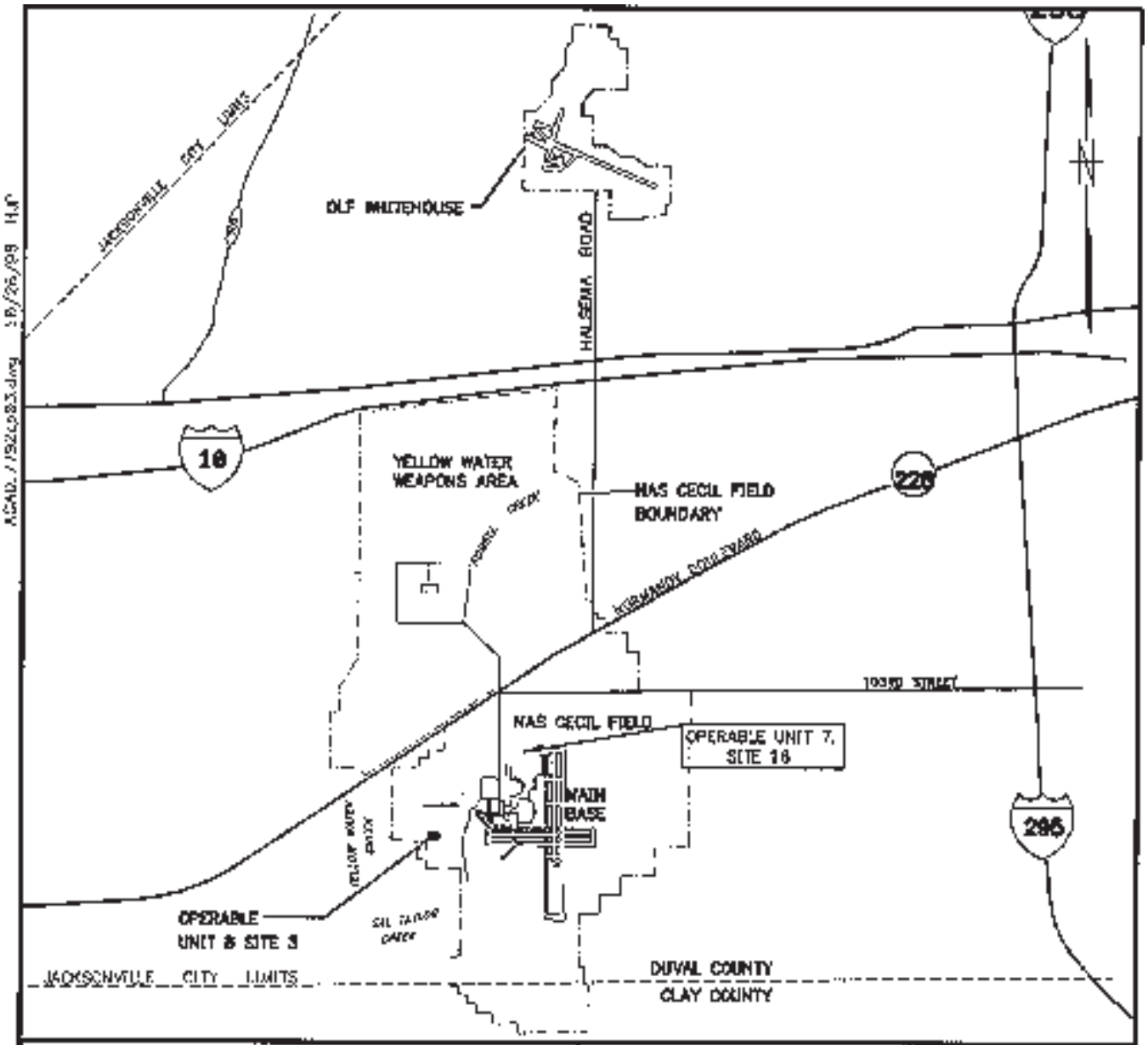
- Extraction, pretreatment, and discharge to a wastewater treatment plant of the groundwater from the area with the highest contaminant concentration, referred to as the source area.
- In-situ treatment of the less contaminated downgradient groundwater with enhanced bioremediation.
- Monitoring of groundwater and treated water quality.
- Implementation of institutional controls to restrict the use of the groundwater as a potable water supply.
- Performance of progress reviews every 5 years.

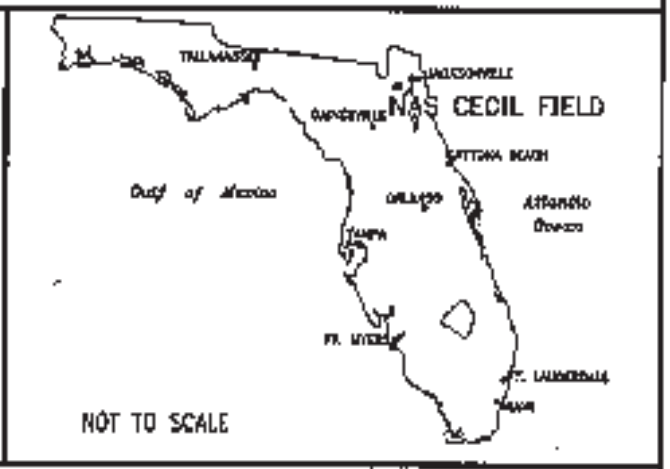
After careful study, the BCT now proposes to replace the first two components of the original clean-up proposal as follows:

- In-situ air sparging of the groundwater in the source area and treatment of the extracted vapors to remove volatilized contaminants.
- Natural attenuation of the groundwater in the downgradient area to remove contaminants through natural processes.
- Repairing a section of the storm sewer.

The remaining components of the previously proposed remedy, including groundwater monitoring, implementation of institutional controls, and performance of progress reviews every 5 years would remain unchanged.

In accordance with CERCLA Section 117, this document summarizes the NAS Cecil Field BCT revised clean-up proposal. For detailed information on the options evaluated for Site 16, consult the Operable Unit 7 Feasibility Study report, which is available for review at the information repository located at the Charles W. Webb Westconnett Public Library, 6887 103rd Street, Jacksonville, FL 32210, Tel: (904) 778-7305.





DRAWN BY HJP DATE 10/26/98			CONTRACT NO. 7792
CHECKED BY DATE		GENERAL LOCATION MAP OPERABLE UNIT 7 NAVAL AIR STATION CECIL FIELD JACKSONVILLE, FLORIDA	APPROVED BY DATE 11/2/98
COST/SCHED-AREA			APPROVED BY DATE
SCALE AS NOTED			DRAWING NO. FIGURE 1 / REV. 0

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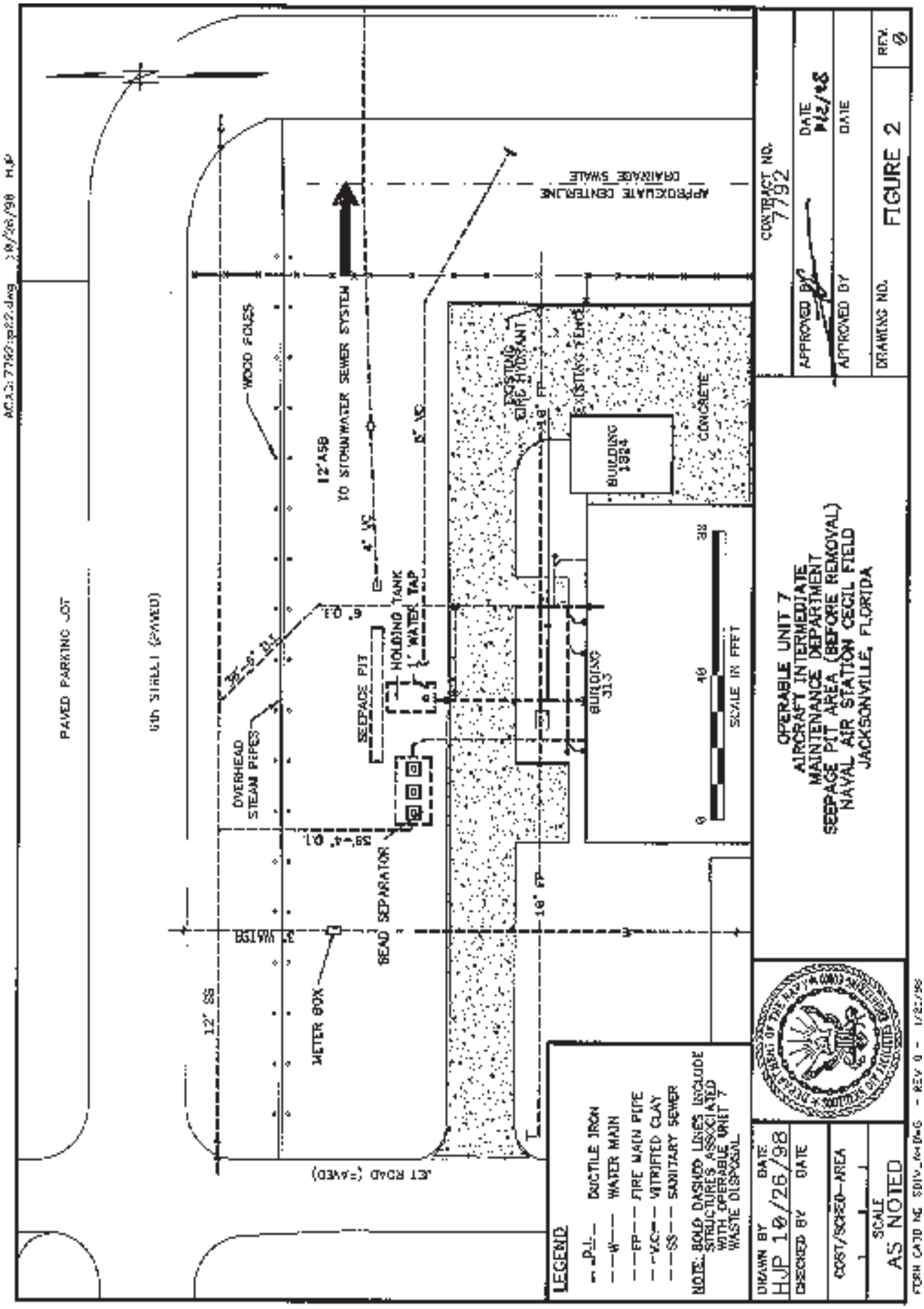
PAVED PARKING LOT
6th STREET (PAVED)
WOOD FOLES
12"ASB
TO STORMWATER SEWER SYSTEM
APPROXIMATE CENTERLINE
DRAINAGE SWALE
EXISTING FIRE HYDRANT
EXISTING FENCE
BUILDING 1924
CONCRETE
HOLDING TANK
1" WATER TAP
SEEPAGE PIT
OVERHEAD STEAM PIPES
BUILDING 313
SCALE IN FEET
BEAD SEPARATOR
WATER
WATER BOX
12" SS
ST ROAD (PAVED)
LEGEND
DUCTILE IRON
WATER MAIN
FIRE MAIN PIPE
VITRIFIED CLAY
SANITARY SEWER
NOTE: BOLD DASHED LINES INCLUDE STRUCTURES ASSOCIATED WITH OPERABLE UNIT 7 WASTE DISPOSAL
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OPERABLE UNIT 7
AIRCRAFT INTERMEDIATE MAINTENANCE DEPARTMENT
SEEPAGE PIT AREA (BEFORE REMOVAL)
NAVAL AIR STATION CECIL FIELD
JACKSONVILLE, FLORIDA
CONTRACT NO. 7792
APPROVED BY
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FIGURE 2
REV. 0

What do you think?

The Navy, as the lead agency, is accepting formal public comments on this proposal from January 18 to February 17, 1999. You don't have to be a technical expert to comment. If you have a concern or preference, the BCT wants to hear it before making a final decision on how to protect your community. To comment formally:

Offer oral comments during the comment portion of the public hearing, if such a hearing is requested (see page 10 for details).

Send written comments postmarked no later than February 17, 1999 to:

Mr. Charles Underwood
Public Affairs Officer
NAS, Cecil Field
P.O. Box 111
Jacksonville, Florida 32215-0111

E-mail comments by February 17, 1999 to: pao@cecilfield.com

Site History

Following is a brief history of Site 16:

- **1959-1980**: Site 16 was used to dispose of greases, rusts, scale and paints wastes from the cleaning of machines and engines parts as well as waste glass beads and blasting grit from the airframes blasting shop. Most wastes were discharged to a 4,100-gallon underground concrete holding tank located north of Building 313 and from there to an adjacent pit which allowed seepage of the waste directly into the subsurface soil and groundwater. In the late 60s, the seepage pit was modified to allow discharge to the storm sewer system.

- **1980-1989**: Use of the seepage pit was discontinued in 1980 and connecting pipes were removed or plugged. A bead separator was installed and its discharge was connected to the sanitary sewer system. During that period, the holding tank was used as a Resource Conservation and Recovery Act (RCRA) permitted facility for the 90-day storage of hazardous wastes. In 1989, the system was abandoned. All piping connections between Building 313 and the bead separator and holding tank were removed and plugged and the content of the holding tank were removed for offsite treatment and disposal. The tank itself remained in place.

- **1993-1994**: In March 1993, a modification to the RCRA permit of the holding tank stipulated that this tank must be closed. A Focused Feasibility Study (FFS) was performed to determine the objectives of the required IRA and to evaluate remedial alternatives. Following the FFS, a Proposed Plan was prepared and a public meeting was held to present the proposed remedy, which was subsequently documented in an Interim Record of Decision (IROD), dated March 1994. In May 1994, as part of an IRA, the holding tank, seepage pit, and glass bead separator were excavated and removed from the site. Associated piping was removed or plugged with grout and 1,500 cubic yards of surrounding contaminated soil was excavated and disposed of offsite.

- **1994-1996**: A Remedial Investigation (RI) was conducted. Samples of surface and subsurface soil, and groundwater were collected and analyzed. Results of these analyses were used to determine human health and ecological risks. The Baseline Risk Assessment (BRA) determined that there were no unacceptable ecological risks at Site 16 but that groundwater contained three chlorinated VOCs, including 1,1- and 1,2-dichloroethene (DCE) and trichloroethene (TCE), which would result in significant human health risk if the groundwater was to be used as a source of drinking water. Based on the results of the RI and the BRA, a Feasibility Study (FS) was performed to define Remedial Action Objectives (RAOs) and evaluate a range of clean-up alternatives to meet these objectives.

- **1996**: A Proposed Plan was prepared to identify the preferred clean-up alternative for Site 16. A public meeting was held at NAS Cecil Field on March 21, 1996 to present this Proposed Plan and to respond to public comments. The Proposed Plan and other documents related to the environmental evaluation of Site 16 (RI, BRA, FS) were made available for public review and comments for a 30-day period from March 21, to April 21, 1996. Based on the resolution of the comments received at the public meeting and during the comment period, a Record of Decision (ROD) was prepared to select the clean-up alternative for Site 16.

A Closer Look at the BRAC Clean-up Team's Proposal

1. In-situ Air Sparging of Source Area Groundwater and Treatment of Extracted Vapors

Chemicals in the groundwater are present at levels that would present concern to the health of future residents if this groundwater were to be used as a source of drinking water. Under this alternative, compressed air would be forced into the groundwater of the highly-contaminated source area through 10 injection wells. This would result in the volatilization of the organic chemicals of concern (COCs), which would then be drawn out by the vacuum action induced through 14 vapor extraction wells. The extrated vapor would pass through a catalytic oxidizer to remove the volatilized organic COCs and the treated air would then be vented to the atmosphere. The use of a bed of granular activated carbon (GAC) to remove the COCs may be evaluated in the future as contaminant concentrations decrease. Periodically, the bed of GAC would be replaced and the spent GAC would be disposed offsite. In addition, a section of the leaking storm sewer would be repaired to limit offsite migration of contaminated groundwater.

2. Natural Attenuation of Downgradient Groundwater

In the less-contaminated downgradient area, naturally-occurring processes, such as biological degradation, dispersion, and adsorption would be relied upon to reduce contaminant concentrations down to clean-up levels.

3. Long-term Monitoring

Groundwater would be regularly sampled and analyzed to monitor the decrease in contaminant concentrations.

4. Implementation of Institutional Controls

Administrative action would be taken to limit the use of groundwater as a drinking water source until the clean-up levels have been reached.

5. Five-year Reviews

Progress reviews would be conducted every 5 years to determine the continued adequacy of the remedy. In the long-term, this alternative would comply with the RAO and ARARs.

6. Contingency Remedy

If during implementation of proposed remedy, it is determined that this remedy no longer adequately protects human health and the environment, additional active remedial measures will be evaluated and implemented.

Summary of Site Risk

A BRA was performed as part of the RI to evaluate human health and ecological risks at Site 16.

The BRA showed that, under current land use, exposure to surface and subsurface soil, groundwater, and sediment at Site 16 does not result in any unacceptable cancer or noncancer human health risks. The excess lifetime cancer risk (ELCR) was within the EPA acceptable range of 1 in a million to 1 in 10,000 and the noncancer hazard index (HI) was below the EPA acceptable threshold of 1.0.

However, the BRA also showed that, if in the future Site 16 is developed for residential use and the underlying groundwater is used for drinking purposes, cancer and noncancer human health risks would become unacceptable. The ELCR and HI for an hypothetical future resident were determined to be 3 in 1,000 and 50, respectively. The main contaminant contributing to this cancer risk was identified as 1,1-DCE in groundwater. Major contributors to the noncancer risk were identified as 1,1-DCE, 1,2-DCE, and TCE.

The BRA showed that, under current or future land use, exposure to surface and subsurface soil, groundwater, and sediment at Site 16 does not result in any unacceptable ecological risk.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternatives or one of the other active measures considered, may present a current or potential threat to public health, welfare, or the environment.

What are the Clean-Up Objectives and Levels?

Using the information gathered during the site investigations and the results of the BRA, the BCT has identified the following Remedial Action Objective (RAO) for OU 7, Site 16:

- Protect humans from exposure to groundwater by preventing its use as a drinking water source in the shallow aquifer, where contaminant concentrations are higher than site health risk criteria or regulatory standards and guidance criteria.

Site-related Chemicals of Concern (COCs)	Range of Detections (µg/L)	Site-specific Clean-up Level[1] (µg/L)
VOCs in groundwater		
1,1,1-Trichloroethane	3,000	200
1,1-Dichloroethene	400	7
1,2-Dichloroethene (total)	270 - 12,500	70[2]
Trichloroethene	12 - 530	3
Inorganics in groundwater		
Arsenic	3.6 - 56.2	50

NOTES:

1. **Clean-up Levels are taken from Chapter 6 (Guidance Concentrations Index) of the FI Groundwater Guidance Concentrations (December 1996).**
2. **Clean-up level is for cis-1,2-Dichloroethene.**

Use of ARARs in Evaluation Process

Applicable or relevant and appropriate requirements (ARARs) are federal and state environmental requirements used to evaluate the appropriate extent of site clean-up, scope and formulate remedial alternatives, and control the implementation and operation of a selected remedial action. Potential chemical-, location-, and action-specific ARARs are defined in the General Information Report (GIR). Each alternative has been evaluated to determine its compliance with ARARs. Chemical-, location-, and action-specific ARARs that apply to OU 7 are presented in Section 5.0 of the FS, dated August 1995. The proposed clean-up plan will meet ARARs.

Clean-Up Alternatives for Operable Unit 7, Site 16

Groundwater Clean-up Alternatives

The OU 7 FS report reviews all the options which the BCT considered for clean-up of Site 16. These options, referred to as "Clean-up Alternatives," are different combinations of plans to restrict access, to contain, remove, or treat contamination in order to protect public health and the environment.

During the upcoming public comment period, the BCT welcomes your comments on the proposed clean-up plan, as well as the other technical approaches that the team evaluated. These clean-up alternatives are summarized below. Please consult the OU 7 FS report for more detailed information.

Based on information currently available, the preferred alternative provides the best balance of trade offs among the other alternatives with respect to the evaluation criteria.

No Action

Alternative MM-1: No-Action

Evaluation of the No-Action alternative is required by law as a basis for comparison with other alternatives. Under this alternative, no remedial action would be taken to reduce risks to human health and the environment. Concentrations of COCs in groundwater might eventually be reduced down to clean-up levels through natural attenuation processes but no monitoring would be performed which would quantify this reduction. This alternative would not comply with the RAO and ARARs.

Limited Action

Alternative MM-7: Natural Attenuation

Under this alternative, natural processes, such as biological degradation, dispersion, advection, and adsorption would reduce the concentration of groundwater contaminants down to clean-up levels. Groundwater would be regularly sampled and analyzed to monitor the decrease in contaminant concentrations. Administrative action would be taken to limit the use of groundwater as a drinking water source until the clean-up levels have been reached. Progress

reviews would be conducted every 5 years to determine the continued adequacy of the remedy. In the long-term, this alternative would comply with the RAO and ARARs.

Treatment

Alternative MM-2: Enhanced Bioremediation

Under this alternative, natural processes for the biological degradation of groundwater contaminants would be enhanced. Nutrients would be injected in the groundwater through 9 wells (6 in the source area and 3 in the downgradient area) to foster the growth of naturally-occurring microorganisms. These organisms would then break down organic contaminants until clean-up levels are met. Groundwater would be regularly sampled and analyzed to monitor the decrease in contaminant concentrations. Administrative action would be taken to limit the use of groundwater as a drinking water source until the clean-up levels have been reached. Progress reviews would be conducted every 5 years to determine the continued adequacy of the remedy. In the long-term, this alternative would comply with the RAO and ARARs.

Alternative MM-3: Groundwater Extraction, Treatment, and Discharge to Surface Water

Under this alternative, groundwater would be pumped out of the ground from 6 extraction wells. The extracted groundwater would be treated to break down organic contaminants through a combination of irradiation with ultra violet (UV) light and addition of a strong chemical oxidant, such as hydrogen peroxide. The groundwater would then be clarified to settle-out suspended material and percolated through a bed of GAC to adsorb residual contaminants. The treated groundwater would be discharged to the storm sewer system and from there to surface water. Periodically, the bed of GAC would be replaced and the spent GAC would be disposed offsite, as well as other treatment residuals, such a the solids generated by the clarification process. Treated water would be regularly sampled and analyzed to verify that its quality meets requirements for discharge to surface water. Groundwater would also be regularly sampled and analyzed to monitor the decrease in contaminant concentrations. Administrative action would be taken to limit the use of groundwater as a drinking water source until the clean-up levels have been reached. Progress reviews would be conducted every 5 years to determine the continued adequacy of the remedy. In the long-term, this alternative would comply with the RAO and ARARs.

Alternative MM-4: Sparging of Groundwater

Under this alternative, compressed air would be forced into the groundwater through 14 injection wells (10 in the source area and 4 in the downgradient area). This would result in the volatilization of the organic COCs, which would then be drawn out by the vacuum action induced through 22 vapor extraction wells (14 in the source area and 8 in the downgradient area). The extracted vapor would pass through a catalytic oxidizer to remove the volatilized organic COCs and the treated air would then be vented to the atmosphere. The use of a bed of GAC to adsorb the COCs may be evaluated in the future as contaminant concentrations decrease. Periodically, the bed of GAC would be replaced and the spent GAC would be disposed offsite. Groundwater would also be regularly sampled and analyzed to monitor the decrease in contaminant concentrations. Administrative action would be taken to limit the use of groundwater as a drinking water source until the clean-up levels have been reached. Progress reviews would be conducted every 5 years to determine the continued adequacy of the remedy. In the long-term, this alternative would comply with the RAO and ARARs.

Alternative MM-5: Groundwater Extraction, Pretreatment and Discharge to a Wastewater Treatment Plant

Under this alternative, groundwater would pumped out of the ground from 6 extraction wells. The extracted groundwater would be treated by air stripping, or other appropriate process, to lower the concentration of TCE to a level appropriate for discharge to the NAS Cecil Field wastewater treatment plant. Residual TCE and other COCs would then be removed by the wastewater treatment plant. Exhaust air from the air stripper would pass through a bed of GAC to adsorb the volatilized TCE and the treated air would then be vented to the atmosphere. Periodically, the bed of GAC would be replaced and the spent GAC would be disposed offsite. Groundwater would also be regularly sampled and analyzed to monitor the decrease in contaminant concentrations. Administrative action would be taken to limit the use of groundwater as a drinking water source until the clean-up levels have been reached. Progress reviews would be conducted every 5 years to determine the continued adequacy of the remedy. In the long-term, this alternative would comply with the RAO and ARARs.

Alternative MM-6: Enhanced Bioremediation (MM-2) and Groundwater Extraction, Pretreatment, and Discharge to a Wastewater Treatment Plant (MM-5)

This alternative is a combination of Alternatives MM-2 and MM-5. Under this alternative, groundwater from the highly contaminated source area would be pumped out of the ground through one extraction well. The extracted groundwater would be pre-treated by air stripping and discharged to the NAS Cecil Field wastewater treatment plant. Exhaust gas from the air stripper would pass through a bed of GAC to adsorb TCE and be then vented to atmosphere. In the less-contaminated downgradient area, air and nutrients would be added to the groundwater through 3 injection wells to promote the volatilization and biodegradation of organic contaminants. Volatilized organic contaminants would be drawn out through 8 vapor extraction wells and the extracted vapor would be passed through a bed of GAC to adsorb organic contaminants. Periodically, the GAC beds from the source and downgradient treatment systems would be replaced and the spent GAC would be disposed offsite. Groundwater would also be regularly sampled and analyzed to monitor the decrease in contaminant concentrations. Administrative action would be taken to limit the use of groundwater as a drinking water source until the clean-up levels have been reached. Progress reviews would be conducted every 5 years to determine the continued adequacy of the remedy. In the long-term, this alternative would comply with the RAO and ARARs.

Comparison of Groundwater Clean-up Alternatives
Site 16 – NAS Cecil Field

Nine Criteria(1)	MM-1 No Action	MM-7** Natural Attenuation	MM-2* Enhanced Bioremediation	MM-3 Extraction, Treatment, & Discharge to Surface Water	MM-4** Air Sparging	MM-5* Extraction, Pretreatment, 8 Discharge to Wastewater Treatment Plant	MM-6* Extraction, Pretreatment, & Discharge of Source Area Groundwater to Wastewater Treatment Plant Enhanced Bioremediation of Downaradient Groundwater
Protects human health and environment	x	✓	✓	✓	✓	✓	✓
Meets Federal and State requirements	x	✓	✓	✓	✓	✓	✓
Provides long-term protection and permanence	x	✓	✓	✓	✓	✓	✓
Reduces toxicity, mobility, or volume through treatment	x	✓	✓	✓	✓	✓	✓
Provides short-term protection	x	✓	✓	✓	✓	✓	✓
Implementability	✓	✓	✓	✓	✓	✓	✓
State Acceptance	TO BE DETERMINED AFTER PUBLIC COMMENT PERIOD AND DISCUSSED IN THE AMENDED RECORD OF DECISION						
Community Acceptance	TO BE DETERMINED AFTER PUBLIC COMMENT PERIOD AND DISCUSSED IN THE AMENDED RECORD OF DECISION						
Cost (present worth)	$0	$503,000 $252,000[2]	$2,256,000	$5,732,000	$1,829,000 $1,140,000[3]	$3,672,000 $1,946,000[3]	$2,916,000
Time to reach clean-up goals	100+ years	30 years	12 years	30 years	12 years	30 years	12-30 years

NOTES:

x: Does NOT meet criterion ✓: Meets criterion *: Components of Navy's original preferred alternative **: Component of Navy's revised preferred alternative

1. Remedial alternatives are examined with respect to nine criteria set forth by CERCLA and factors described in the EPA RI/FS Guidance Manual (EPA, 1988)
2. Cost for treatment of downgradient area only
3. Cost for treatment of source area only

What impacts would the clean-up options have on the local community?

- Alternatives that involve extraction and treatment of groundwater (MM-3 and MM-5) would pose a potential risk to treatment systems operators. In addition, the transportation of treatment residue for offsite disposal would pose a potential risk to nearby communities. However, measures would be taken to minimize and control these risks.
- Alternatives which do not immediately achieve clean-up levels (MM-2, MM-3, MM-4, MM-5, MM-6, and MM-7) include administrative action to limit the use of the groundwater from the surficial aquifer as a source of drinking water until these clean-up levels have been reached.
- Alternatives that involve in-situ (MM-2, MM-4, and MM-6) and/or on-site (MM-3, MM-5, and MM-6) treatment would use the site for treatment. This would limit use and/or development of the site for the duration of the clean-up.
- The No-Action Alternative would not prevent exposure to site contaminants, resulting in unacceptable human health risks if residential development occurs and groundwater from the surficial aquifer is used as a source of drinking water.

Why Does the BRAC Clean-up Team Recommend this Proposed Plan

Originally, the clean-up plan proposed for OU 7, Site 16 was Alternative MM-6, which is a combination of Alternative MM-5: Groundwater Extraction, Pretreatment, and Discharge to a Wastewater Treatment Plant for the more contaminated source area and Alternative MM-2: Enhanced Bioremediation for the less contaminated downgradient area. This clean-up plan underwent public review and was subsequently confirmed by the ROD. However, after further evaluation of the clean-up alternatives, the BCT now recommends a revised clean-up plan. For the more contaminated source area, the BCT now recommends Alternative MM-4: Sparging of Groundwater. For the less contaminated downgradient area, the BCT now recommends Alternative MM-7: Natural Attenuation. These changes are recommended for the following reasons:

- Alternative MM-4 is preferred to Alternative MM-5 for clean-up of the source area because in situ sparging of air in the groundwater of the highly-contaminated source area is expected to be more effective than groundwater extraction for the interception of the pockets of pure or near-pure chlorinated solvent, known as dense non-aqueous phase liquid (DNAPL), which are responsible for the constant recharge of contaminants into the groundwater.
- With the closure of NAS Cecil Field, the Wastewater Treatment Plant may no longer be available for the discharge of the pre-treated groundwater as proposed under Alternative MM-5.
- Alternative MM-4 is expected to achieve clean-up goals sooner (12 years instead of 30 years) and more cost-effectively ($1,140,000 instead of $1,946,000) than Alternative MM-5, while meeting all federal and state environmental
- Alternative MM-4 would not impact future use of the source area as much as Alternative MM-5 as an air-sparging and vapor extraction system would be significantly less obstructive than a groundwater extraction and pre-treatment system.
- In the downgradient area, the naturally-occurring anaerobic biodegradation processes, which have already been observed in the groundwater at the site and which are part of Alternative MM-7, are better suited for the removal of low concentrations of chlorinated VOCs than the artificially promoted aerobic biodegradation processes associated with Alternative MM-2.

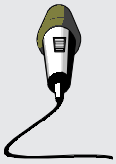
The Navy expects that the preferred alternative satisfies the statutory requirements in CERCLA Section 121(b) that the selected alternative be protective of human health and the environment, comply with ARARs (or justify a waiver), be cost-effective, utilize permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable, and satisfies the statutory preference for treatment as a prinicple element.

The EPA (as a support agency) concurs with the preferred alternative.

Next Steps:

The BCT will review all comments and prepare the Record of Decision document describing the chosen clean-up plan. The Record of Decision, which includes a summary of responses to public comments, will then be made available to the public at the Charles D. Webb Wesconnett Public Library, Jacksonville, Florida. The BCT will also announce its decision through the local news media and the community mailing list.

What's a Formal Comment?



Formal comments are used to improve the clean-up proposal. During the 30-day formal comment period, the BCT will accept formal written comments and hold a hearing, if requested, to accept formal verbal comments.

To make a formal comment, you need to present your views during the public hearing, or submit a written comment during the comment period. A request for a public hearing to present your formal comments must be made in writing. The request must be postmarked no later than February 17, 1999 and should be sent to:

Mr. Charles Underwood
Public Affairs Officer
NAS Cecil Field
P.O. Box 111
Jacksonville, Florida 32215-0111

Federal regulations require the BCT to distinguish between "formal" and "informal" comments. While the BCT uses both your comments and Restoration Advisory Board (RAB) comments throughout site investigation and clean-up activities, the team is only required to respond to formal comments on the Proposed Plan in writing. If a public hearing is requested, there will be no verbal response to your comments during the formal hearing portion of the meeting. Once the formal hearing portion of the public meeting is closed, the BCT may respond to informal questions, if they choose.

The BCT will review the transcript of all formal comments received at the hearing and all written comments received during the formal comment period, before making a final clean-up decision. They will then prepare a written response to all formal comments.

Your formal comment will become part of the official public record. The transcript of comments and the BCT team's written responses will be issued in a document called a Responsiveness Summary when the team releases the final Record of Decision (ROD).

For More Detailed Information

To help the public understand and comment on the proposal for the site, this publication summarizes a number of reports and studies. All of the technical and public information publications prepared to date for the site are available at the following information repository:

Charles D. Webb Wesconnett
Public Library
6887 103rd Street
Jacksonville, Florida 32210
Tel: (904) 778-7305

Additional information on NAS Cecil Field and its ongoing environmental programs can also be found on the Internet at http://www.cecilfield.com.

Use This Space to Write Your Comments
or to be added to the mailing list

The BCT wants your written comments on the options under consideration for dealing with the contamination at Operable Unit 7, Site 16. You can use the form below to send written comments. If you have questions about how to comment, please call Charles Underwood at (904) 778-6055. This form is provided for your convenience. Please mail this form or additional sheets of written comments, postmarked no later than February 17, 1999 to:

Mr. Charles Underwood

Public Affairs Officer

NAS, Cecil Field

P.O. Box 111

Jacksonville, Florida 32215-0111

or E-Mail to: pao@cecilfield.com

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(Attach sheets as needed)

Comment submitted by: _____

Mailing list additions, deletions, or changes

If you did not receive this through the mail or would like to

- ❒ be added to the site mailing list
- ❒ note a change of address
- ❒ be deleted from the mailing list
- ❒ obtain additional information concerning the RAB

Name: _____

Address: _____

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Naval Air Station, Cecil Field
Operable Unit 7, Site 16
Public Comment Sheet (continued)

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Mr. Charles Underwood

Public Affairs Officer

NAS, Cecil Field

P.O. Box 111

Jacksonville, Florida 32215-0111