



# MARCH AFB CALIFORNIA

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 451144

**PROPOSED PLAN**  
**SITE 19 (WEST MARCH SLUDGE DRYING BEDS)**  
**AFRPA OPERABLE UNIT 2**  
**FORMER MARCH AIR FORCE BASE, CALIFORNIA**



**Air Force Civil Engineer Center**  
**2261 Hughes Avenue, Suite 155**  
**Joint Base San Antonio - Lackland, Texas 78236-9853**

**January 26, 2015**

Note: Air Force Real Property Agency (AFRPA) was realigned under the Air Force Civil Engineer Center (AFCEC) in 2012.

# Proposed Plan



AIR FORCE REAL PROPERTY AGENCY OPERABLE UNIT 2  
RECORD OF DECISION AMENDMENT

**U.S. AIR FORCE**

CHANGES TO THE SELECTED REMEDY FOR CONTAMINATED SOIL AT WP019  
(SITE 19) - WEST MARCH SLUDGE DRYING BEDS

FORMER MARCH AIR FORCE BASE

January 2015

## Purpose and Summary Statement

The Air Force Civil Engineer Center is issuing this **Proposed Plan**<sup>1</sup> to seek public input on the Air Force's proposed amendment to the 2004 Air Force Real Property Agency<sup>2</sup> (AFRPA) Operable Unit 2 (OU2) **Record of Decision (ROD)**. This amendment will change the selected remedy for soil at WP019 (Site 19), known as the West March Sludge Drying Beds (see Figure 1). The original remedy required Institutional Controls (ICs) due to contaminants in soil at concentrations above cleanup goals in the ROD. ICs are non-engineering controls placed on sites to protect human health and the environment. The new remedy for Site 19 will be No Further Action, leaving the land suitable for Unlimited Use and Unrestricted Exposure (UU/UE), meaning the land can be used for any purpose, including residential housing, hospitals for human care, public or private schools for persons under 18 years of age, and day care centers for children. This Proposed

## How You Can Get Involved

### Public Comment Period

**April 7, 2015 to May 7, 2015**

The Air Force encourages the public to gain a more comprehensive understanding of this site and is seeking public comments on this Proposed Plan. The Air Force will accept written comments during the public comment period. Written comments can be submitted to:

Calvin C. Cox  
Cherokee Nation Technology Solutions (CNTS)  
18374 Phantom Street  
Victorville, CA 92394  
Phone: (760) 246-5360 (office)  
E-mail: Calvin.cox@cn-bus.com

### Public Meeting

**April 29, 2015, 6:00 p.m.**

The Air Force will hold a public meeting to explain this proposed plan. Oral and written comments will be accepted at the meeting. The meeting will be held at:

March Joint Powers Authority  
23533 Meyer Drive  
Riverside, CA 92518

### Administrative Record

To review relevant documents, including this Proposed Plan (AR Number 451144) and the ROD Amendment that will follow, the Administrative Record is available online at:

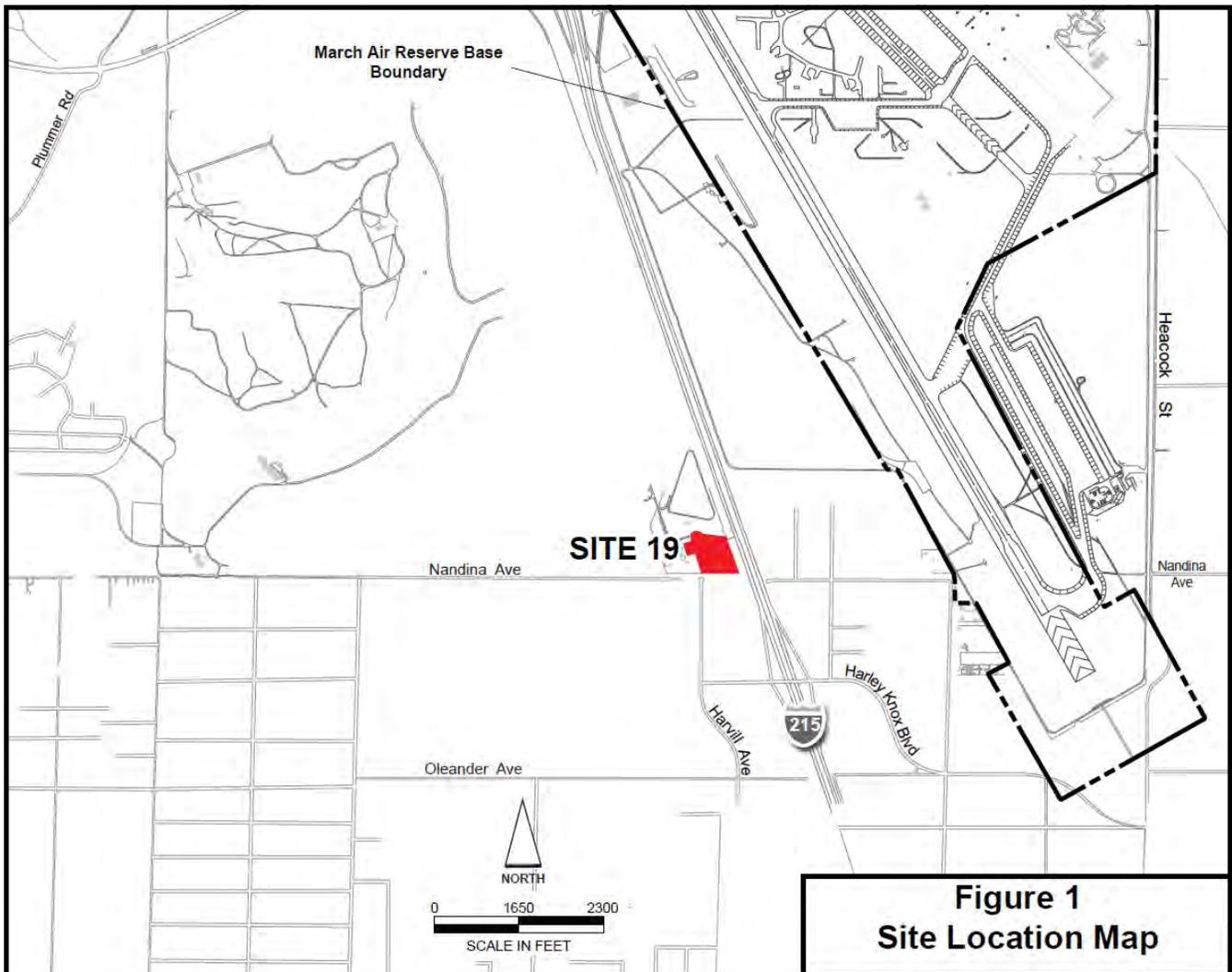
<http://afcec.publicadmin-record.us.af.mil>

These documents are also available at March Air Reserve Base. Please contact Mr. Calvin Cox (see above) for access, or for help with the electronic documents.

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<sup>1</sup> Words in **bold italics** are defined in the Glossary of Terms on Page 9.

<sup>2</sup> AFRPA was realigned under the Air Force Civil Engineer Center in 2012.



**Figure 1**  
**Site Location Map**

Plan explains why ICs prohibiting future unrestricted redevelopment are no longer needed. All documents cited in this Proposed Plan, and their **Administrative Record (AR)** numbers, are listed on Page 9.

March Air Reserve Base (ARB) is located in southern California, approximately 5 miles southeast of the city of Riverside. Site 19 is located at the southern end of the area known as West March, part of Former March Air Force Base (AFB) (Figure 1). The wastewater treatment plant where Site 19 is located was constructed in 1941, and was used to process wastewater from March AFB. Originally, the 7.5-acre site included 10 unlined sludge drying beds. In the past, wastewater treatment sludge was spread out in these beds to dry before removal from the site. By 1990, three of the sludge drying beds had been backfilled with soil, three were inactive, and four were lined with concrete and remained active.

A Remedial Investigation was conducted between 1987 and 1995 to characterize Site 19 soil and groundwater contamination. The 1997 OU2 **Remedial Investigation/Feasibility Study Report** presented a **human health**

**risk assessment** showing that the groundwater at Site 19 has not been impacted; however, shallow soil contaminants were present at concentrations acceptable for industrial land use (consistent with the current wastewater treatment facility), but not for residential land use (UU/UE). The human health risk assessment identified contaminants in the soil at concentrations that could pose a risk to human health under the residential land use scenario; these contaminants include the pesticide **dieldrin**, the **polychlorinated biphenyl (PCB)** Aroclor 1260, several carcinogenic **polycyclic aromatic hydrocarbons (PAHs)**, and the metal **chromium (VI)**.

In 2000, remedial alternatives for those OU2 sites then administered by the AFRPA (including Site 19) were presented in the AFRPA OU2 Proposed Plan. The 2004 AFRPA OU2 ROD selected ICs that prohibited residential use at Site 19.

The Site 19 property was transferred to the March Joint Powers Authority (JPA), then to the Western Municipal Water District (Western) in 2006. Between 2009 and 2011, Western conducted facility upgrades to increase

treatment capacity. The facility upgrades resulted in the excavation or disturbance (grading) of much of the shallow soil that covered Site 19. Figures 2 and 3 respectively show Site 19 before and after upgrades were completed. The excavated soil stockpiles were sampled and clean soil was reused on-site; contaminated soil was disposed off-site at a landfill licensed to accept hazardous waste. In March 2014, a Remedial Investigation Addendum presented a revised human health risk assessment that showed the residual concentrations of soil contaminants are acceptable for residential land use (UU/UE). Therefore, no further action is necessary at Site 19 for the remedy to be protective of human health and the environment.

## History of the Environmental Cleanup Program at March ARB and Former March AFB

The Department of Defense/Air Force developed the Installation Restoration Program (IRP) in 1980 to address soil and groundwater contamination at Air Force bases nationwide under the **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**. In 1983, the Air Force identified 30 potentially contaminated sites at March AFB and recommended further investigation at most of those sites. In 1989, the United States Environmental Protection Agency (U.S. EPA) placed March AFB on the National Priorities List (NPL), as a result of soil and groundwater contamination by chlorinated solvents and other contaminants. In September 1990, the Air Force (as lead agency) entered into a Federal Facilities Agreement (FFA) with the U.S. EPA and the State of California to facilitate the assessment and cleanup process. The FFA established procedures for involving Federal and State regulatory agencies, as well as the public, in the restoration process at March AFB. Four OUs were designated to facilitate the restoration processes; Site 19 is within OU2. The division of the OUs was primarily based on location and similarities in contaminant type and distribution. In 1993, the Base Realignment and Closure (BRAC) Commission recommended March AFB for realignment. In 1996, active Air Force personnel were transferred to Travis

AFB, and the base was re-designated March ARB. Following realignment, the Air Force retained approximately 2,700 acres of the base for military use. The remaining 4,000 acres were transferred to a local reuse authority (March JPA) so that the property can be developed for commercial or municipal use. This transferred property is known as Former March AFB, and IRP activities for this area (including Site 19) are currently administered by the Air Force Civil Engineer Center. This Proposed Plan fulfills the requirements of CERCLA Section 117(a), and Section 300.430(f)(2) of the NCP.

## Land Conditions at Site 19

The wastewater treatment plant is currently owned and actively operated by Western. The ground surface at Site 19 is predominantly flat with a gentle slope to the east. The land is highly developed and does not encompass any sensitive habitat or known archeologically significant areas. Surface water drains toward the east into an unlined channel. The depth to groundwater below Site 19 is approximately 15 feet, and has been stable since the 1990s; groundwater flow is to the east. As described below, previous well sampling indicates the groundwater has not been impacted by Site 19 contaminants.

## Site Investigations

### Soil Investigation

Seventy-five soil samples were collected for laboratory analysis between 1987 and 1995 for the remedial investigation at Site 19; these included seven composite samples collected from within sludge drying beds at an approximate depth of 6 feet. The remaining samples were collected from locations outside the sludge drying beds, at depths ranging from the surface and 15 feet. Table 1 presents contaminants previously detected in soil at Site 19 at concentrations that exceed the November 2014 U.S. EPA Regional Screening Levels (RSLs) for residential land use. RSLs are risk-based values, expressed in **parts per million (ppm)**, for evaluating and cleaning up contaminated sites. RSLs

**Table 1. Soil Contaminants Previously Detected at Site 19 in Excess of Residential RSLs\***

Contaminant	Maximum Concentration Detected (in ppm)	Residential RSL (in ppm)
Dieldrin (pesticide)	0.0384	0.03.
Aroclor 1260 (PCB)	0.31	0.24
Benzo(a)pyrene (PAH)	0.4	0.015
Benzo(b)fluoranthene (PAH)	0.73	0.015
Benzo(a)anthracene (PAH)	0.30	0.15
Indeno(1,2,3-cd)pyrene (PAH)	0.32	0.15
chromium (VI) (metal)	2.29	0.30

\* These sampling results reflect soil conditions before excavation was conducted at Site 19 between 2009 and 2011.



**LEGEND**

- SOIL BORING
- ⊗ HAND-AUGER BORING
- MONITORING WELL (SOIL SAMPLE)
- ▭ ACTIVE SLUDGE DRYING BED
- ▨ FORMER SLUDGE DRYING BED (BACKFILLED)
- ▩ INACTIVE SLUDGE DRYING BED
- ▭ SITE 19 BOUNDARY

**ABBREVIATION**

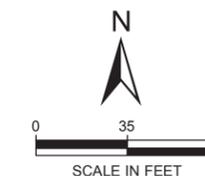
- AFB AIR FORCE BASE
- ARB AIR RESERVE BASE
- CA CALIFORNIA
- FT FEET
- RSL REGIONAL SCREENING LEVEL (USEPA 2014)
- SDB SLUDGE DRYING BED
- USEPA UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**DATA VALIDATION QUALIFIER**

- J LABORATORY ASSIGNED DATA QUALIFIER INDICATING RESULT IS DETECTED BELOW THE REPORTING LIMIT AND IS AN ESTIMATED CONCENTRATION

**NOTES**

SAMPLE RESULTS SHOWN EXCEED USEPA 2014 RESIDENTIAL RSLs CONCENTRATIONS ARE IN PARTS PER MILLION (ppm)



**Figure 2**  
Site 19 Prior to Upgrade  
(December 2004)



**LEGEND**

- SOIL BORING
- ⊗ HAND-AUGER BORING
- MONITORING WELL (SOIL SAMPLE)
- ▭ ACTIVE SLUDGE DRYING BED
- ▨ FORMER SLUDGE DRYING BED (BACKFILLED)
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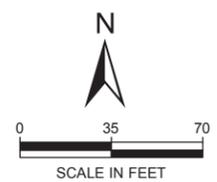
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SAMPLE RESULTS SHOWN EXCEED USEPA 2014 RESIDENTIAL RSLs  
CONCENTRATIONS ARE IN PARTS PER MILLION (ppm)



**Figure 3**  
**Site 19 Following Upgrades**  
**(June 2012)**

combine current human health toxicity values with standard exposure factors to estimate contaminant concentrations in environmental media (soil, air, and water) that are considered by the U.S. EPA to be health protective of lifetime human exposures. Chemical concentrations above these levels would not automatically designate a site as "dirty" or trigger a response action. However, exceeding a RSL suggests that further evaluation of the potential risks that may be posed by site contaminants is appropriate. RSLs for residential land use are lower (more restrictive) than RSLs for industrial land use.

## Groundwater Investigation

Five monitoring wells were installed at Site 19, and were routinely sampled from 1993 to 1997 to assess groundwater impact. However, no contaminants of concern were detected, and the groundwater was excluded from the Site 19 remedy selected in the 2004 AFRPA OU2 ROD. In 1998, all five Site 19 monitoring wells were properly destroyed.

## Ecological Risk

The ecological risk assessment for Site 19 concluded that remediation of the entire site would probably cause more damage, due to destruction and loss of habitat, than if the contaminants were left in place. Further, human activity at Site 19 prevents the establishment of significant populations of wildlife species, and any wildlife routinely seen at the site is likely tolerant of human activity and disturbance. Finally, the distribution of contaminants in soil indicates that exposures would be localized and would not likely cause unacceptable impacts to species of concern.

## Selection of the Original Site 19 Remedy

In 2004, prior to the wastewater treatment plant upgrades conducted by Western, ICs were selected as the remedy for Site 19 in the 2004 AFRPA OU2 ROD. The Air Force developed four remedial alternatives and evaluated them against the Site 19 remedial action objectives and the nine CERCLA criteria shown in the insets on the next page. The following summarizes the remedial alternatives evaluated:

**Alternative 1 – No Action.** The No Action alternative was not chosen for Site 19 because, in 2004, the soil contained contaminants at concentrations that were considered unsafe for residential use. Without limits on land use, or site cleanup measures, this alternative was not considered to be protective of human health and the environment.

**Alternative 2 – ICs (selected remedy).** The ICs imposed at Site 19 prohibit all residential land uses and prohibit use by sensitive groups (i.e., hospitals for human care, public or private schools for persons under 18 years of age, and day care centers for children). The institutional controls also prohibit any activity that would disturb the soil in the former sludge drying pits; and by prohibiting removal, disturbance, or any other interference with fences and warning signs. This alternative was selected because it protects human health and the environment, complies with the environmental protection requirements, and cost-effectively balances the remaining seven evaluation criteria.

**Alternative 3 – Excavation and Off-Base Disposal.** This alternative included the excavation, transport, and disposal of affected soil in an off-site landfill.

**Alternative 4 – Excavation and Off-Site Incineration.** This alternative included the excavation of affected soil, and treatment of the soil by incineration at off-site licensed facility.

## Excavation and Disposal of Contaminated Soil

During construction of wastewater treatment plant upgrades between 2009 and 2011, the contaminated soil at Site 19 was removed as part of extensive grading activities. Construction was performed in accordance with a Soil Management Plan approved by the California Department of Toxic Substances Control (DTSC). Soil removed from beneath (and within 25 feet of) the sludge drying beds was stockpiled on plastic sheeting prior to characterization sampling. Approximately 800 cubic yards of soil were disposed at the Kettleman Hills hazardous waste disposal facility in Kettleman City, California.

## Summary of the Post-Excavation Risk Assessment

During construction of the wastewater treatment plant upgrades, a significant amount of the contaminated soil at Site 19 was either removed or disturbed. Therefore, a new human health risk assessment was conducted in 2013 to estimate the site risks under current site conditions. Hypothetical future residents could be exposed to residual contaminants in the soil through skin contact, ingestion, and inhalation. The new risk assessment only considered the sample locations which remained undisturbed after construction of the water treatment plant upgrades.

## REMEDIAL ACTION OBJECTIVES

Remedial action objectives describe what a cleanup effort is expected to accomplish. The following remedial action objectives were established for Site 19 in the 2004 AFRPA OU2 ROD:

- ⇒ Assure that human health and the environment will be protected before and after the property is transferred and used for the expected future use.
- ⇒ Limit use of the property to prevent unacceptable risk.
- ⇒ Prevent exposure to contaminated soil.

## NINE CERCLA CRITERIA USED TO EVALUATE CLEANUP ALTERNATIVES

**Overall Protection of Human Health and the Environment.** The degree to which each alternative eliminates, reduces, or controls threats to human health and the environment is assessed. Strategies can include no action, treatment, engineering methods, or institutional controls.

**Compliance with Applicable or Relevant and Appropriate Requirements.** The alternatives are evaluated for compliance with environmental protection requirements.

**Long-term Effectiveness.** The alternatives are evaluated based on their ability to maintain reliable protection of human health and the environment after implementation.

**Reduction of Contaminant Toxicity, Mobility, and Volume.** Each alternative is evaluated based on how it reduces the harmfulness of contaminants and their ability to move through the environment.

**Cost.** The benefits of a particular alternative are weighed against the cost of implementation.

**Short-term Effectiveness.** The length of time needed to implement each alternative is considered. The risks that a particular alternative may pose to workers and nearby residents are assessed, as well as risks to the environment.

**Implementability.** The technical feasibility and administrative ease of a remedy, including the availability of goods and services are considered.

**State Acceptance.** The Air Force requests State comments on the Proposed Plan. Then, the Air Force considers whether the State agrees with, has reservations about, or opposes the Preferred Alternative.

**Community Acceptance.** The Air Force assesses community acceptance of the Preferred Alternative through community outreach and comment on the selected remedy. A 30-day public comment period is held. The Air Force considers and responds to public comments, including revising the remedy, before the final decision.

Human health risk assessments typically evaluate all adverse health effects (both cancer and non-cancer) from the contaminants of concern at the site. For non-cancer effects, a Hazard Index (HI) is calculated. A HI value less than 1 may be considered acceptable, depending on site conditions. It should be noted that a HI value greater than 1 does not necessarily mean that an actual adverse health effect will develop, but rather raises a concern of an increased potential for an adverse effect. The cumulative non-cancer HI for residential receptors due to soil at Site 19 was below the target of 1 before the treatment plant upgrades, and remains well below 1 (0.013) after the upgrades.

The calculated cancer risk estimates the probability that additional cases of cancer may develop within a population if people are exposed to contaminated soil. To manage carcinogenic risk, the U.S. EPA has developed the following ranges: 1) Greater than one additional cancer case per 10,000 people ( $>1 \times 10^{-4}$  risk) is unacceptable; 2) One additional cancer case per 1,000,000 ( $1 \times 10^{-6}$  risk) to one additional cancer case per 10,000 ( $1 \times 10^{-4}$  risk) is in a range considered generally acceptable; 3) Less than one additional cancer case per 1,000,000 or more people ( $<1 \times 10^{-6}$ ) is considered acceptable. The soil grading and excavation associated with upgrades to the wastewater treatment plant reduced cumulative cancer risk to future hypothetical residential receptors at Site 19 from the unacceptable ( $10^{-4}$ ) range to the generally acceptable ( $10^{-5}$ ) range.

## **Remedy Re-evaluation and Selection of the No Further Action Alternative**

Because conditions have fundamentally changed at Site 19 since the signing of the 2004 AFRPA OU2 ROD, the Air Force determined that a reassessment of the Site 19 remedy is needed. Construction activities at Site 19 reduced soil contaminants to concentrations considered safe for all land uses (including residential); therefore, no further action is needed to protect human health and the environment. Because the contaminated soil was physically removed from the site, the volume of contaminants was reduced. Based on a reevaluation of the No Action alternative against the nine CERCLA criteria, it is now preferred as the proper course of action for Site 19. However, because action has already been taken at Site 19 in the form of soil excavation, the No Action alternative will hereafter be referred to as the No Further Action alternative. The No Further Action alternative can be easily implemented through administrative means, and costs are limited to one-time expenses for preparing this proposed plan and a ROD Amendment. State and federal regulators have concurred with the recommendation for site

closeout in the Site 19 Remedial Action Addendum/Risk Assessment Revision Report; and community acceptance will be assessed after the public comment period and public meeting for this proposed plan.

## **Multi-Agency Team Concurs with Site 19 Remedy**

The Air Force has worked with the U.S. EPA, the DTSC, and the Regional Water Quality Control Board (RWQCB) - Santa Ana Region throughout the investigation of Site 19, the evaluation of potential risk, and the review of proposed cleanup options. The regulatory agencies play a key role in coordinating and reviewing environmental investigations and cleanup, and were involved in the review of all major documents and activities associated with Site 19. These reviews included the OU2 Remedial Investigation/Feasibility Study Report, the AFRPA OU2 Proposed Plan, the 2004 AFRPA OU2 ROD, and the Site 19 Remedial Investigation Addendum/Risk Assessment Revision Report. Based on their reviews of these key documents, the regulatory agencies concur with this Proposed Plan and the Air Force's recommendation for No Further Action at Site 19; and concur with amending the 2004 AFRPA OU2 ROD to reflect the Site 19 remedy change.

## **The Public's Role in the Revised Remedy Selection**

After the 30-day comment period on the Proposed Plan closes and the public meeting is held, the Air Force – in consultation with State and Federal regulatory agencies – will consider all comments before selecting a revised remedy for Site 19. The Air Force will publish its selected remedy in the forthcoming amendment to the AFRPA OU2 ROD. This ROD Amendment will include the Air Force's response to all comments received on the Proposed Plan during the 30-day public comment period and public meeting.

## Glossary of Terms

**Administrative Record** is a compendium of all documents relied upon to select an alternative for a remedial action.

**Chromium (VI)** is a cancer-causing inorganic chemical used in making stainless steel, textile dyes, wood preservation, and as anti-corrosion and conversion coatings and a variety of niche uses. Hexavalent chromium is another common name for chromium (VI).

**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, also known as Superfund, is a Federal law that regulates environmental investigation and cleanup of sites identified as potentially posing a risk to human health and/or the environment.

**Dieldrin** is an insecticide widely used during the 1950s to early 1970s. However, it is an extremely persistent organic pollutant that is biomagnified as it is passed along the food chain. Long-term exposure has proven toxic to a very wide range of animals including humans. For this reason, it is banned throughout most of the world.

**Human Health Risk Assessment** is an analysis of the potentially adverse human health effects caused by potential exposure to hazardous substances released at a site.

**Parts per million (ppm)** is a measure of contaminant concentration in soil, and is sometimes expressed as milligrams per kilogram (mg/kg). A simple analogy is that 1 ppm would be like one pancake in a stack of pancakes 4 miles tall.

**Polychlorinated biphenyls** are oily liquids widely used in numerous industrial applications, and were commonly found in electric transformers. Due to PCBs' environmental toxicity and classification as a persistent organic pollutant, PCB production was banned in the United States in 1979. PCBs have been shown to cause cancer in animals, and there is also evidence that they can cause cancer in humans.

**Polycyclic Aromatic Hydrocarbons (PAHs)** are organic compounds formed by the high-temperature burning of a variety of materials including fossil fuels, cigarettes, wood, coal, and tar. Consequently, PAHs are one of the most widespread organic pollutants in the air and in soil. Therefore, the presence of PAHs in soil, especially in urban areas, does not necessarily mean that a spill or release has occurred. Several varieties of PAHs are known to cause cancer.

**Proposed Plan** is a document that reviews cleanup alternatives, summarizes the recommended cleanup actions, explains the reasons for recommending them, and solicits comments from the community.

**Record of Decision (ROD)** is a public document that explains the selected remedial alternative to be implemented at a specific site. The ROD is based on information and technical analysis generated during the Remedial Investigation/Feasibility Study and on consideration of public comments received throughout the process and in response to the Proposed Plan.

**Remedial Investigation/Feasibility Study Report** identifies and evaluates cleanup technologies for a site based on effectiveness, availability, cost, and other criteria.

## List of Documents Cited in this Proposed Plan

Date	Document Title	AR* Number(s)
Jul 1997	Installation Restoration Program Stage 5, Operable Unit 2, March Air Force Base, California, Final Remedial Investigation/Draft Final Feasibility Study Report	678 - 694
Jul 2000	Draft Final Proposed Plan for Cleanup of Contaminated Soil and Groundwater at Operable Unit No. 2, March Air Force Base	1629
Aug 2000	Proposed Cleanup Plan, Operable Unit 2, Air Force Base Conversion Agency Sites, March Air Force Base, California	1639
Apr 2004	Former March Air Force Base, California, Operable Unit 2, Air Force Real Property Agency, Record of Decision	2226
Mar 2014	Remedial Investigation Addendum/Risk Assessment Revision, WP019 - West March Sludge Drying Beds	420524
Jan 2015	Proposed Plan, Site 19 (West March Sludge Drying Beds), AFRPA Operable Unit 2, Former March Air Force Base, California	451144

\* The Administrative Record can be accessed at the following website: <http://afcec.publicadmin-record.us.af.mil>

## How Do I Submit Comments?

The Air Force encourages you to provide written comments about the preferred alternative under consideration for this Proposed Plan. You can use the form below (but you don't have to use this form) to send written comments. If you have questions about how to comment, please call Mr. Calvin Cox at (760) 246-5360. Please send this form or additional sheets of written comments, postmarked no later than May 7, 2015 to Mr. Calvin Cox at the address below or email your comments to **Calvin.cox@cn-bus.com**.

### PRIVACY ACT STATEMENT

Your comments are requested. Personal home addresses and phone numbers will not be published in the ROD Amendment or other documents. Written and oral comments may be published in the ROD Amendment and as required by law; they will be addressed in the Responsiveness Summary that will be made available to the public. Private addresses will be compiled for a mailing list for those requesting copies of documents. However, only the names of the individuals and their comments will be disclosed.



#### Public Comment

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

Comment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Fold, stamp, and mail

Return Address:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Postage  
Stamp  
Here

Calvin C. Cox  
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Technology Solutions (CNTS)  
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**FINAL PAGE**

**ADMINISTRATIVE RECORD**

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