alan mearns

Please consider a cleanup alternative that takes advantage of natural processes coupled with ecokogical risk assessment. Before I retired from NOAA I was part of a team that provided guidance to the US Coast Guard during respnses to oil and chemical spills including the Exxon Cldez and the Deepwater Horizon. Hydrocarbons, including diesel and PAHs degrade rapidly once exposed to water and the atmosphere. Addition of nutrients helps enhamce hydrocarbon degrading microorganisms. Planting native vegetation also helps accelerate degradation of hydrocarbons when planted in the exposed soils. There is abundant literature supporting this approach. There is also abundant literature supporting ecological risk assessment using tools such as Species Sensitivity Distributions as well as soil and pore water toxicity tests during cleanups. Subsurface contaminated soil and sediments can be excavated, spread over a portion of the Lower Yard surface,tilled, treated with nutrients as appropriate, and monitored to document the rapid decline of diesel, benzene, other hydrocarbons. Additional monitoring with soil chemical measurements and toxicity tests can document the rates of contaminant loss and reductions in toxicity. This approach would mitigate shipping soils off site and be much better approach than capping. Please consider an approach that makes use, on site, of natural processes coupled with ecological risk assessment and chemical and ecotoxicity monitoring using using plant, animal and life stagea of organisms expected to proliferaate in the area once cleanup is completed.