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LETTER FROM TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
REGARDING FACILITY INVESTIGATION WORKPLAN 29 SEPTEMBER 1994 NAS CORPUS
CHRISTI TX
11/5/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

November 5, 1996

Commanding Officer
Code 189
NAS Corpus Christi
11001 D Street, Suite 143
Corpus Christi, Texas 78419-5021

Attention: Mr. Terry Boone, Environmental Manager

Re: Naval Air Station - Corpus Christi (NAS-CC)
TNRCC Solid Waste Registration No. 30479
TNRCC Hazardous Waste Permit No. HW -50038
EPA ID No. TX7170022787
Texas Natural Resource Conservation Commission (TNRCC) Oversight of Solid Waste Management Unit (SWMU) 357 (Underground Storage Tank 305)

Dear Sir:

In the TNRCC's May 26, 1995 letter (Re: Review of RCRA Facility Investigation Workplan, dated September 29, 1994, Approval with Modifications), the TNRCC agreed to NAS-CC's request that SWMU 357 be incorporated into the ongoing TNRCC Petroleum Storage Tank (PST) Program, Leaking Petroleum Storage Tank (LPST) investigation at nearby Building 1153 (LPST No. 101358). As stated in the above-mentioned letter, "However, should NAS-CC or the TNRCC determine that investigation or corrective action under the PST Program is inappropriate, NAS-CC shall comply with Permit Provision VIII," relating to performance of a RCRA Facility Investigation in accordance with the above-referenced permit (Permit).

To date, the PST Division has not incorporated SWMU 357 into the LPST No. 101358 investigation. In addition, the PST Division has not responded to a report received March 12, 1993, from Mr. J.E. Bittle of NAS-CC (reference 6280, code 189), which provides information on SWMU 357 and which was submitted in response to the February 9, 1993 letter from TNRCC Region 14 Office to Mr. Terry Boone of NAS-CC.

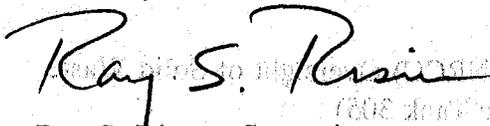
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After consultation with Ms. Liz Scaggs of the PST Division, it has been decided by TNRCC Industrial and Hazardous Waste (I&HW) Division, Corrective Action Section staff that, given the nature of the wastes stored in SWMU 357, corrective action should be conducted in accordance with the Permit as administered by the I&HW Program. In addition, since the unit is not funded under the Defense Environmental Restoration Account, I&HW Program oversight will be provided by the Corrective Action Team, rather than the Federal Facilities Team.

Finally, please note that should the TNRCC determine that the SWMU 357 contaminant plume is commingled with the LPST No. 101358 plume, oversight of the LPST No. 101358 case will also be transferred to the I&HW Program and corrective action will be conducted in accordance with the Permit.

Should you have any questions regarding this matter please contact Mr. Brad Wilkinson of the Corrective Action Team at 512/239-2350, Mail Code MC-127.

Sincerely,



Ray S. Risner, Supervisor
Corrective Action Team
Industrial and Hazardous Waste Division

PSL/gb/biw

cc: Mark Craig, SOUTHNAVFACENGC, North Charleston, SC
David Harvey, TNRCC Region 14 Office, Corpus Christi
Bob Sturdivant, EPA Region VI, Dallas
Liz Scaggs, PST Division, Responsible Party Remediation Section (Re: LPST 101358)
Gordon Banner, I&HW Division, Federal Facilities Team
Tennie Larson, I&HW Division, Corrective Action Section