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LETTER REGARDING THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
COMMENTS IN RESPONSE TO THE DRAFT SAMPLING AND ANALYSIS PLAN FOR SITE
INVESTIGATION AT FUEL FARMS 217 AND 244, NAS CORPUS CHRISTI TX

11/4/2013

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Transmitted via email

November 4, 2013

Allan Posnick
Texas Commission on Environmental Quality
allan.posnick@tceq.texas.gov

Subject: Comments on Draft Sampling and Analysis Plan, Site Investigation UST 9, Fuel Farms 217 and 244, NASCC, Corpus Christi, TX, September 2013

Dear Mr. Posnick:

The comments provided below are in response to the Draft Sampling and Analysis Plan (SAP) for the investigation of Fuel Farms 217 and 244. As referenced in the SAP, Fuel Farms 217 and 244 were identified as Solid Waste Management Units (SWMUs) in the August 1988 RCRA Facility Assessment (RFA) Preliminary Review (PR)/Visual Site Inspection (VSI). The February 1989 RFA Evaluation recommended that Fuel Farms 217 and 244 be included in a RCRA Facility Investigation (RFI).

I am pleased that the SAP includes the analysis of lead scavengers in the groundwater samples that will be collected and that six temporary monitoring wells will be installed at each fuel farm as opposed to one well. The only comment that I have on the SAP is that it does not include a map showing the proposed locations of the temporary monitoring wells. It does state that the well locations will be one up-gradient, one down-gradient, two cross-gradient, and two at locations exhibiting highest PID readings. The conceptual site models (Figures 10-4 and 10-5) show the groundwater flow direction for each fuel farm. Therefore, a map should be included to show the proposed locations for the up-gradient, down-gradient, and cross-gradient temporary monitoring wells.

If you have any questions concerning my comments, please feel free to give me a call.

Sincerely,

Tara Hubner
Project Manager
Federal Facilities Section

cc:
Dennis Rogers, TCEQ
Arne Olsen, Navy