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LETTER REGARDING THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY REVIEW
AND APPROVAL OF THE DRAFT SAMPLING AND ANALYSIS PLAN AT UST 9, FUEL FARM
244 AND 217, NAS CORPUS CHRISTI TX
9/26/2014
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution
September 26, 2014

Mr. Arne E. Olsen
Arne.olsen@navy.mil
Environmental Engineer
Gulf Coast Integrated Project Team
P. O. Box 30, Building 135
Jacksonville, FL 32212

Re: TCEQ Approval
Draft Sampling and Analysis Plan (Draft SAP), Underground Storage Tank Site 9, Fuel Farms 244 and 217, Naval Air Station Corpus Christi, Texas, dated September 2013
TCEQ SWR No. 30479; TCEQ Permit/Compliance Plan No. 50038
EPA ID No. TXD087491973; CN600621155; RN104647466

Dear Mr. Olsen:

The Texas Commission on Environmental Quality (TCEQ) has completed review of the above referenced Draft SAP received on October 7, 2013. The Draft SAP was prepared in order to conduct a Site Investigation (SI) to address the potential release of petroleum contamination from Underground Storage Tank Site 9, which includes underground storage tanks in the former Fuel Farms 217 and 244. The objective of the SI is to determine whether a release to environmental media has occurred, and whether the fuel farm requires additional investigation under the TCEQ Petroleum Storage Tank (PST) program or meets a no further action determination in accordance with state and federal requirements. The Draft SAP, has been prepared to conform with the requirements of Texas Administrative Code (TAC) Chapter 334, Underground and Aboveground Storage Tanks, including the sampling requirements in TCEQ publication RG-411, *Investigating and Reporting Releases from Petroleum Storage Tanks (PST)*, dated August 2012. The Draft SAP will also evaluate potential lead scavengers based on the EPA's Memorandum: *Recommendations for States, Tribes, and EPA Regions to Investigate and Clean Up Lead Scavengers When Present at Leaking Underground Storage Tank (LUST) Sites*, dated May 2010.

Based on our review we concur with the planned activities, and the data review/reporting procedures in the Draft SAP. Please note that it is the continuing obligation of persons associated with a site or facility to ensure that industrial solid waste and/or municipal hazardous waste are managed in such a way that it does not cause a discharge of waste or an imminent threat of discharge, nor a nuisance or an endangerment to either human health or the environment as required by 30 TAC §335.4. Be advised that the burden remains upon the owner to take necessary and authorized action to correct such conditions whenever they exist.

Questions concerning this letter should be directed to me at (512) 239-2332. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127 with an additional copy submitted to the local TCEQ

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Region Office. Please note that the Remediation Division sends letters via email when appropriate. Therefore, current email addresses and the site identification information in the reference block should be included in all future submittals.

Sincerely,



Allan Posnick, DSMOA Program Manager
Corrective Action Team 3, VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

AP/mdh

cc: Hector Gonzales, Waste Program Manager, TCEQ Region 14 Office, Corpus Christi
Ms. Tara Hubner, EPA Region 6, Federal Facilities Section, Hubner.Tara@epa.gov