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NAS FORT WORTH
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LETTER REGARDING U S EPA REGION VI REGULATORY REVIEW AND COMMENTS ON
RCRA FACILITY INVESTIGATION WORK PLAN ADDENDUM AND SAMPLING AND
ANALYSIS PLAN ADDENDUM FOR OIL WATER SEPARATOR ASSESSMENT NAS FORT
WORTH TX
4/5/1994
U S EPA REGION VI

125 00



**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 125



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

File: 17C-9-2
D.B.

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April 4, 1994

Christopher D. Hobbins
Team Chief
Base Closure Restoration Division
HQ AFCEE/ESB
8001 Inner Circle Drive, Suite 2
Brooks AFB, TX 78235-5328

Re: Carswell Air Force Base
Oil/Water Separator Assessment

Dear Mr. Hobbins:

The Environmental Protection Agency has reviewed the Work Plan Addendum and the Sampling and Analysis Plan Addendum for the proposed Oil/Water Separator Assessment for Carswell Air Force Base. Our comments are enclosed. If you have any questions, please feel free to contact me at (214) 655-6749.

Sincerely,


Gary A. Baumgarten
Project Manager

Enclosure

cc: Frank Grey, AFBDA/OL-H

EPA Review Comments
Installation Restoration Program
Oil/Water Separator Assessment

Work Plan Addendum

General Comment: No contingencies are discussed in the work plan in the event contamination is identified at any of the sampling locations. If the PID indicates contamination at any of the boring locations, will additional sampling be conducted to determine the areal extent of contamination?

Figure 3-1, Page 3-3: The legend on this figure does not identify all of the items shown on the figure. The legend should be updated to define all items.

Figure 3-9, Page 3-11: Sampling needs to be conducted on the other side of the wall in this area to determine if any contamination may have migrated from the source.

Historical Info
Page 3-14, Paragraph 1: It is unclear what the purpose of onsite background sampling locations are for and where exactly the background samples would be taken. Have background samples for the site been taken previously? It does not seem reasonable to take background samples in an area where the oil/water separators have been located or in an area that could possibly be affected by the separators or other site activities.

Page 3-20, Sampling and Analysis Activities: Due to the nature of possible contaminants on the samples (petroleum, oils and lubricants), the samples should also be analyzed for semivolatile organic compounds.

Sampling and Analysis Plan Addendum

Section 1.8.1, Page 1-5: How accurate is the back calculation proposed to determine if TCLP regulatory limit would be exceeded? Depending on the accuracy of the back calculation, it seems appropriate to run TCLP for values which are under regulatory limits.

Section 2.2.1 - Page 2-20: At what depth is the bottom of the oil/water separator located? Depending on the depth of the bottom of the separator, it seems possible that any leakage from the separator could have migrated to below the bottom of the separator. It is recommended that the borings should be drilled to a depth below the bottom of the oil/water separators in an attempt to define the vertical extent of contamination.

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