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MINUTES FROM BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING FROM  
18 MAY 1995 NAS FORT WORTH TX  
5/18/1995  
BRAC TEAM

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

**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 254

**Air Force Base Conversion Agency  
Base Realignment and Closure  
Cleanup Team Meeting**

MINUTES OF 18 MAY 1995

REGULAR MONTHLY MEETING

A regular monthly meeting of the Air Force Base Conversion Agency (AFBCA) Base Realignment and Closure (BRAC) Cleanup Team (BCT), was held on Thursday, 18 May 1995. The meeting was called to order by Mr. Frank Grey, AFBCA Base Environmental Coordinator, at 1300 hours in the Civil Engineering Large Conference Room (Bldg 1215) at Naval Air Station (NAS) Fort Worth Joint Reserve Base (JRB), Carswell Field.

**IN ATTENDANCE:**

Mr Olen Long, AFBCA/OL-H  
Mr Frank Grey, AFBCA/OL-H  
Ms Randi Audelo, AFBCA/OL-H  
Mr Michael Botwin, AFBCA/OL-H

Capt Joseph A. Feaster AFCEE/ERB

Mr Jim Ferro, South Div Nav Fac Eng Com  
Mr Joel Sanders, South Div Nav Fac Eng Com

Mr Gary Baumgarten, EPA  
Mr Geof Meyer, TNRCC/IHW  
Mr Ray Newby, TNRCC/PST

Mr Tim Sewell, TNRCC Region 4

Mr John Cummings, NAS Dallas,  
Environmental Dept  
Mr J.D. Davis, Nas Fort Worth ENV

Mr Larry Hughes, Ensafe/Allen & Hoshall  
Mr Jeff James, Ensafe/Allen & Hoshall  
Ms Shamaine Chambers King, Informatics  
Corp  
Dr Beth Laney, MITRE  
Mr John O'Brien, LAW Environmental

**Introductions of New Members**

Mr Grey opened the meeting at 1410 on Wednesday, 15 February by asking those who had not previously attended a BCT meeting to introduce themselves. Joel Sanders, Ray Newby, Jeff James, John O'Brien, and John Cummings introduced themselves.

**Items of Concern**

There was a question about the status of the action items from the last BCT meeting. Mr Long responded that they had created an entirely new program based on the recommendations from the regulators. New 1391s and *racer* estimates have been created on every project. In some cases they match the Navy's estimates and in others they do not. In all cases, they match the recommendations from the February BCT special meeting. Mr Long reported that they had requested all funds for all the projects for FY 95, FY96 and FY97. Funds are scarce, so the highest priority projects will be funded first. If NOV's exist, if there is a health hazard, or if the state is pressuring for a project to

occur, those projects will be funded first. The remaining projects will receive funds according to their priority.

Mr Long reported that one project, the gas station, had been funding a number of projects. It was fully funded but did not require the full funding at this time. He stated that the golf course was not presently funded completely. The prison is funded to complete the study. There was some question about the funding for the DoD range. At a BEC conference, Mr Grey was told that the funding had been cut, but he stated that they were not going to act on that information until they saw it in writing.

Mr Long said that everything needed to transfer the base had been funded: closing the TSDFs, clean closure of tank storage, PCB storage. Money has been allocated and approved, not just budgeted.

Capt Feaster reported on FY95 funded projects. The UST removals (10), UST upgrades, and the golf course maintenance IRA are combined on one delivery order. Recently these were sent out for proposal. They are now in technical and cost evaluation. There may be some partial solutions to this. It may be broken into parts again. They were funded for the program amount. Capt Feaster stated that the aerospace museum and the grounds maintenance yard have been funded and awarded. A first draft of plans has been submitted and is currently under review. Parts of those plans will be modified and submitted to the regulators next month.

Off-site Weapons Storage Area Low Level Radioactive Waste Interim Removal Action final plans have been submitted and are under consideration by the AF radioisotope committee as to whether they will need to approve of the plans. They are trying to decide if they want to regulate past low level sites. That decision should be made within a week. A notice to proceed will be given so that *Capinett (?)* can come to the base and initiate field work. There are plans to visit the facility at the end of the month. Envirocare may be asked to bring their training here. England AFB is on the same plan. It has been a problem to break them back out for the AR and for the regulators. These were awarded in FY94.

Capt Feaster noted that long-term monitoring on the low level radioactive waste is funded for FY95, but may not be required.

Mr Grey asked about the risk assessment for the fire training area. Capt Feaster responded that the risk assessment is apparently not the scope that is needed.

Mr Baumgarten asked for a schedule for when the projects would be occurring, when to expect work plans, etc. Mr Grey responded that spreadsheets had been sent and that an oversized timeline had been produced. He would give these to him. **Capt Feaster said that he would provide a breakdown of the projects, including when plans would be produced.** This would allow the regulators to better plan their time and help everyone to better understand the status of the projects. Capt Feaster reported that delivery order plans and reports would probably begin coming through AFCEE rather than directly from the contractors to the regulators.

Mr Baumgarten asked if the contractors provided weekly or monthly updates, and what happens to those. Capt Feaster said that they did and that these were reviewed in contract meetings. Mr Long reported that they were going to begin using a "bluebook" approach of tracking projects. The regulators could call Alan Flolo to determine the status. Mr Baumgarten and Mr Sewell agreed that

they needed regular updates so that they would be consistently updated about the progress of projects. Mr. Grey discussed the AFCEE spreadsheets, but said that they would not be useful because they are difficult to interpret. Mr Long suggested that Capt Feaster give a presentation on the status of the projects each month, as well as upcoming projects. **Capt Feaster agreed that he could do these reports.** This report will be included with the minutes and will allow the regulators to plan to be present if something is planned for which they need to be present.

Mr Long named Alan Flolo and Elliot Smith as contact points for all questions regarding these construction-type projects, because Mr Grey, Mr Alvin Brown and Mr Mike Botwin will be leaving for other work assignments. These two inspectors will be overseeing all the projects. Mr Long briefly stated Mr Flolo's and Mr Smith's background concerning construction inspection. Mr Grey will be available for consultation.

Mr Grey expressed concern that the regulators are not being notified by the contractors when there is going to be activity, such as tank pulls, for which they need to be present. The contracts state that they are to give the regulators thirty days' notice. The regulators agreed that the notifications coming from this base have been inconsistent. There is no way for the regulators to plan to allocate their time to attend construction and review plans. The briefings by Capt Feaster will be informative and helpful for the regulators. **Project updates by AFCEE will be an agenda item, as will project updates by the engineering technicians.** They will give updates for what is coming up and it is on schedule. Mr Sewell said that he would call the engineering technicians weekly to check project status. This will be beneficial to both him and AFBCA.

Everyone agreed that the BCT was a good forum to give project updates. The meeting needs to be held on a regular schedule. Mr Baumgarten suggested the afternoon of the second Thursday of each month because the regulators are already in town for Plant 4's BCT that is held that morning. During the summer months, the BCT meetings may necessarily be held sporadically. In the fall, they will be held at a set time each month.

Mr Grey said that the briefing slides from the February BCT meeting provided updated information on the projects. He said that if a project is not included, that it is not funded. Mr Long added that the funding may have been recently promised, but the actual funds have not yet been allocated. Capt Feaster stressed that one of the main players is the new PST representative because the fuel-hydrant systems schedule is in the plans and he should be getting any kinds of permits. **Mr Grey asked that if anything has changed on the schedules since the February briefing, that he get that to the regulators.**

Mr Long handed out spreadsheets on DERA, Compliance and BRAC and explained them. These are rough estimates and are rounded. These provide a timeline from which the Gantt charts are produced. **Mr Long will mail a copy of the Gantt chart to Mr Baumgarten.**

Mr Grey asked **John O'Brien** to discuss the fire training area. He responded that the fire training area is part of delivery order nine, which includes the aerospace museum, the grounds maintenance yard and the fire training area. The fire training area has been separated for the draft plans for the other two sites. A grid will be placed at the museum and the grounds maintenance yard and take some shallow soil samples. Considering the results, the next steps will be taken. Mr O'Brien suggested that they are not expecting to find much at the museum. Samples will be taken to characterize for metals, volatiles, and semi-volatiles. It looks as if there may have had some bad housekeeping, rather than real contamination. Surface sampling will show if there has been

contamination or not. The grounds maintenance yard is more likely to have contamination as more potentially contaminating activities occurred there such as pesticide mixing. Capt Feaster stressed that the investigations in these two areas are small scale. They are meant to characterize them and may or may not lead to an RFI. The soil samples have not yet been taken. It may be possible to take samples until confidence is reached that an accurate characterization has been made. Then they can be closed out. The grounds maintenance area is more contaminated than the aerospace museum and will need to be characterized and then remediated. Sampling will be done using a grid.

There was a discussion of the work plan and the need for flexibility in that work plan in case the grid must be expanded to encompass an area of contamination that becomes apparent as the samples are gathered. Field sampling should be used to cut down on cost and to better determine where samples should be taken. If a PID is used at the site, the contractors would be able to tell which areas needed to be investigated. Mr O'Brien assured the committee that the work plan is flexible. If there is some indication of contamination off the grid, by sighting stressed vegetation, visually contaminated soil, or from the PID, the sampling grid will be moved. Ms Laney voiced a concern that by moving the grid according to PID results, pesticide hotspots might be missed in the area previously targeted. Mr Sewell suggested that rather than moving the grid, the plan should allow for extra samples if they are needed. This would be more effective than going back a second time for more samples. Capt Feaster responded that those samples would be taken, and a contract modification would be made. Mr Long agreed that at that point additional funds would be requested. Mr Meyer talked about doing the investigation so that mobilization would only occur twice: once to investigate and once to remove.

A question was asked about removing the contamination without doing a background study. Mr Meyer responded that each case was considered separately. He added that it was better to have a site-wide background study.

Mr Long stated that one of the projects that was funded was a request that the BOP be clean closed last year based on historical data. The state did not approve this because there was inadequate data. So AFBCA requested funds to provide that data. Part of the funding request was to do a background study base-wide. He discussed that it did not make sense to use that small area as a baseline. As an example, he used the scenario that they might find elevated lead levels in the BOP area, but if lead levels are naturally high, it does not need to be remediated. That is a separate project, off DoD property. The funding has been approved. Capt Feaster stated that he understood that study would work for the BOP parcel and would be site-specific. Mr Long responded that the study would suffice for the whole base. This was the way that it had been funded and written in the Racer. Capt Feaster asked for clarification that the whole base and the groundwater plumes would be included in this background study program. Mr Long agreed that the study would be base-wide. A discussion occurred about the purpose of a background study. Mr Long said that the BOP is the first area to be clean-closed and the background survey is necessary to do that. He said that it is funded and when the money is allocated, the work will begin. It will be out of cycle for FY95.

Capt Feaster introduced Beth Meyer who is doing a background study using historical data. There is much data that needs to be consolidated. She advised that if it is possible, a base-wide background study should be done. Since she had not been aware that this was going to occur, she had given the AF other options such as to use historical data or to use historical data with some sampling. She stated that in her technical opinion a background study should be done. She said that the statistical methods should be discussed with the regulators so that they get all the information necessary. She added that background information is available from Plant 4's background study. She suggested

that they might want to use a combination of historical data, Plant 4's data and new sampling. Mr Sewell asked if background information or a background study from another site might be preferable since both Plant 4 and Carswell share the TCE plume. Ms Meyer responded that depending on the level of funding for the background study, it would be technically better to do one from scratch and to use the Plant 4 data to back it up. Since Plant 4 is a CERCLA site, the sampling will be sufficient. A discussion was held concerning statistical methods. Ms Meyer said that the AF needs to decide whether they want to use the BOP money to do a base-wide or if they want to use historical data.

It was brought up that the Navy wanted to do a study of the oil/water separator at bldg 1027. They are planning to do a site-specific background study. This data could be incorporated into a site-wide background study and use it for all the subsequent sites. Ms Meyer pointed out that for AF and Navy liability there would need to be something in writing.

### **Landfill No. 6 Construction Project**

Mr Grey stated that the Navy has an interest in this construction. Jim Ferro said that they are planning to put van pads on the site. There was a discussion about asbestos and a crushed drum containing tar-appearing material that was dug up during the excavation. The Navy was asked to do some sampling of it. The samples came back as asbestos-containing material. They have covered the area with plastic to make sure that nothing got out due to fugitive dust generation. Mr Grey said that they need to find out from the regulators what they need to do to keep the project going and if there is a problem with continuing with the construction. The Navy needs to know if they can continue construction, what they need to do to salvage the site, or if they need to move the construction. The question was asked if there was anything under there besides asbestos. A geophysical study was done and several anomalies were identified in the van pad area and the area west of landfill no. 6. Two areas were considered significant enough to require intrusive investigation. It appears that one of the inspection trenches may have gone through one of the anomalies. There is at least one other anomaly that has not been trenched yet. The other anomalies do not appear to warrant investigation.

Mr Meyer commented that he was not sure about what to do with asbestos, because he was not aware that they would be discussing it at this meeting. Mr Grey brought up the issue of worker safety for those dealing with the asbestos. Mr Long pointed out that it becomes hazardous when the shingles are broken or disintegrate. The landfill was probably operated in the early 1970s and, according to documents, was used to dispose of "rubble." There was some discussion of how to handle asbestos that is already in a landfill. The regulators discussed that this would not be considered hazardous waste under RCRA, but would be municipal solid waste, which is grandfathered. This is generally dealt with by capping it, deed recording it and proceeding. Since the Navy wants to put a concrete van pad on the site, that would cap it. It needs to be isolated so that humans are not exposed to it.

Mr Sewell asked if anything else was found. Nothing else has been identified as hazardous. Capt Feaster discussed wetting down the asbestos and bagging it. The issue of worker safety was brought up again. Mr Grey asked if the workers are OSHA trained. Mr Ferro responded that he did not think that they had been. This would be a violation of worker health and safety. Mr Grey said that no one was wearing protective gear even though they were performing construction on a landfill. There was discussion that there should not have been any trenching without notifying the regulators. Communication is a problem. Mr Long agreed that there is not good communication

when construction such as trenching occurs. Mr Sewell said that he was not notified until after the fact when there was a problem and they needed advice about how to handle it. Mr Baumgarten pointed out that this site is one of the Air Force's IRP sites and there is not supposed to be any construction on those sites. Mr Sewell said that he had received documentation after it had occurred. It is his understanding that all information should go through Cdr Cox. If that is not happening, he is not going to be informed. Mr Long said that the information was supposed to come through AFBCA and that was not happening either. It should come through the Navy to Cdr Cox to AFBCA and then be sent out.

Mr Grey said that if they had been informed, they would have recommended that the workers have some sort of personal protection. Everyone agreed that this was a serious problem and that some sort of health and safety plan should have been approved through the work plan. Ms Meyer asked if anyone knew where the disconnect was occurring and if there was any way to remedy this. Mr Sanders said that the people monitoring the construction were from a different part of the organization. Mr Long added that they were understaffed. The trenching was done as part of the construction, not as an investigation. Mr Baumgarten pointed out that the construction was not supposed to occur until the site had been investigated, so communication between the environmental people and the construction people is a problem. Mr Grey said that it did not appear that the Navy's construction people were checking the IRP files to see if there are any environmental problems. There have been many problems. **Mr Meyer said that he would find out what they should do with the material that has been excavated and will get back to them.** It is a hazard, but not a hazardous waste. Mr Grey emphasized that something needs to be done to prevent this type of occurrence in the future. There should be a formalized plan of the construction process, detailing communication channels and decision points. **Mr Grey requested that the Navy have a meeting to tell them where construction is going to occur so that AFBCA could tell them where the environmental problems are.** The construction on this project has been stopped until they determine what to do with the material.

Mr Baumgarten stated that the important thing was to get back to original scope of work which was to do the geophysical investigation, do the necessary borings to find out if this is an affected location before construction begins. Mr Sewell stated that the process had already begun through this mishap. Capt Feaster asked if it was wrapped and labeled. There is no way of accurately knowing when the asbestos was placed in the landfill.

A fifteen minute break was taken.

### **Unnamed Stream Focused Remedial Investigation**

Mr Grey reported that the oil/water separator has been filling up with some product. It has been pumped two or three times. The product continues to get into the separator and they can not determinethe source. This occurs primarily after a heavy rain. Mr Grey said that they were concerned because they are finding this out after the fact. They are taking interim measures to try to remedy it. They are trying to get money to find out where it is coming from. He believes that it is linked to the POL tank farm in some way. That is a project that is funded for next year. Mr Long reported that at times the odor is very strong and sometimes it is faint. He said that the smell is of fresh JP4 or JP8, not the rotten smell of old product that has begun to break down. The obvious source is the POL tank farm. There is a french drain line that goes up to the old motor pool area (RV area). People use to change their oil there and let probably let the oil drain straight out into the

drain. He does not believe that the fresh smell is from this. Mr Long said that they thought it might be the pipeline. They placed some diapers along the pipe to see if the product was going through the sand and no product was detected. A sample from the oil/water separator was tested and there were no problems with it. This occurred a few days after the last big rain. While the separator is pumped out, it is being checked to make sure that it is functioning. Mr Grey stated that they would like to tie this project into the POL tank farm project for funds. There are indications that these two sites are commingling. Some sort of interim measure must be taken. The most feasible alternative is to expand the POL tank farm Bioventing project to encompass that sphere of influence. Mr Grey reported that **Sam Taffinder** from AFCEE has been working on this project and will have an update next month. Capt Feaster stated that they are heading towards an **ECA** and a risk evaluation for that work effort, the tank farm, ST14. The hydrogen fueling lines have been tested to the pump station. The Navy may have a leak. There is no test of the tanks themselves, below the floor out to the valving system.

Mr Sewell asked if they knew what the product was. Mr Long responded that they only use JP8 at this site.

There is a release, but it is not clear where it is coming from. The release is not necessarily to state waters, but there is potential that it could go to public waters. The oil/water separator might have been flushed out in the heavy rain, but now that it will be fixed, product build up can be monitored. Mr Grey wanted to know how lenient the regulators would be. He stated that funding was not available for this project that he wanted to do. Mr Meyer wanted clarification that the POL tank farm was only reaching the unnamed stream through the oil/water separator. Mr Long and Mr Baumgarten explained that that was only the theory. The source has not been identified and there just happens to be an oil/water separator at the point where the odor is. Mr Meyer stated that if the contaminate plume is exposed to public waters, where it poses human threat, it is an immediate risk and the state will support getting funds for remediation. If there is imminent threat, it needs to be remediated. There is confusion because high levels have not been found. There is only an odor. The amount of free product has not been determined.

### **POL Tank Farm Bioventing Project**

Capt Feaster wanted to clarify the purpose of the unnamed stream and the POL tank farm investigations. A geophysical survey of the POL tank farm and the Unnamed Stream area, a groundwater screening at the POL tank farm, sediment samples in the unnamed stream, and three rounds of three wells in the unnamed stream have occurred. These areas were pointed out on a site map.

Mr Baumgarten suggested that the next time the odor is apparent near the unnamed stream, someone should walk around with an OVA to see if the source can be determined. **Capt Feaster said that he could get someone to do that. Mr Grey suggested that Mr Taffinder give a presentation to clarify this before a decision is made.** Mr Meyer made a comment about the commingling of the POL Tank Farm and unnamed stream plumes.

### **Adjournment**

Mr Grey checked with the regulators to see if they needed any additional information. The draft Off-site Weapons Storage Area Low Level Radioactive Waste Interim Removal Action Plan was given to the regulators for their comments. Mr Sanders and Mr Ferro had questions for Mr Long

concerning action items from the February BCT meeting. Mr Long answered those questions for them.

The next BCT meeting was scheduled for Thursday, 8 June 95 at 1300 in the large conference room of bldg 1215. The RAB will be held that evening.

Mr Grey adjourned the meeting at 1520.

OLEN LONG, GM-13  
Chairperson

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