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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT RCRA
FACILITY INVESTIGATION FOR PARCEL D AND BACKGROUND STUDY NAS FORT
WORTH TX
8/6/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 305

Barry R. McBee, *Chairman*
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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 6, 1996

Mr. Charles A. Rice
Team Chief
Base Closure Restoration Division
Air Force Center for Environmental Excellence
8001 Inner Circle Drive, Suite 2
Brooks AFB, Texas 78235-5328

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Naval Air Station Ft. Worth JRB/Carswell AFB (NAS Ft. Worth)
TNRCC Solid Waste Registration No. 65004
EPA ID NO. TX0571924042
Hazardous Waste Permit No. 50289
Draft RCRA Facility Investigation (RFI) for Parcel D and Background Study, Dated June, 1996

Request for Modifications

Dear Mr. Rice:

The Corrective Action staff of the Texas Natural Resource Conservation Commission (TNRCC) have reviewed the Work Plan (WP) and Sampling and Analysis Plan (SAP) included in the above referenced document. The following concerns are based on our review of those documents:

1. The WP fails to mention that Hazardous Waste Permit No. 50289 has regulatory authority at NAS Ft. Worth. In addition, although the Installation Restoration Program (IRP) may have a long history of association with CERCLA, the April 1995 BRAC Cleanup Plan acknowledges that the base is not a National Priorities List (NPL) site. As such, CERCLA corrective action is not required. The BRAC Closure Plan goes on to state that the IRP sites are listed in Hazardous Waste Permit and will undergo closure/remediation in compliance with the Texas RCRA-authorized program. Other IRP sites would be managed under the Texas Solid Waste Disposal Act. Failure to recognize RCRA/State authority as the primary regulatory driver could result in negative consequences for the Fast Track cleanup effort because of disputes over inadequate cleanup.

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2. Groundwater samples collected by direct-push technology are acceptable for screening and preliminary site characterization. However, the sample results must be verified with groundwater samples collected from properly installed monitor wells.
3. Surface soil samples (Section 3.3.2.3, page 3-7) should characterize the upper two feet of soil. The proposed sampling of the upper six inches of soil does not address the Risk Reduction Rules' (RRR, 30 Texas Administrative Code (TAC) §335, Subchapter S) concerns for direct contact of contamination in the upper two feet of the soil column.
4. Subsurface soils samples (Section 3.3.2.4, page 3-8) must be obtained in accordance with Provision VIII.A.2.b. of Hazardous Waste Permit No. HW-50289. This Provision requires continuous cores to a depth of 20 feet, then five foot sampling intervals thereafter until groundwater is reached. We applaud the WP's proposal to locate discrete samples based on field analyses and observations.
5. In order to facilitate review of the WP, Figure 3-1 should have indicated where the Radioactive Waste Storage Area, Inspection Shop, and existing wells are located at the Weapons Storage Area (WSA). In addition, groundwater flow directions in each aquifer need to be depicted. Topographic information would also be helpful.
6. Section 3.3.2.5 of the WP, page 3-11, proposes that the radioactive waste storage casings will have one shallow alluvium monitor well installed downgradient and two monitor wells installed upgradient. Assuming the gradient is referring to groundwater hydraulics, the proposed configuration is contrary to Permit Provision VIII.A.2.b.(2) and is the reverse of what is necessary to determine if a release has occurred. Please install the two monitor wells hydraulically downgradient and as close as possible to the storage casings, and one well hydraulically upgradient of the storage casings.

Figure 3-1 also indicates that the Air Force Center For Environmental Excellence (AFCEE) believes the shallow groundwater gradient is southeast to northwest. Our recollection of the site indicates that a deep creek gorge is north of the site. We also recall that the northern side of the WSA was subject to groundwater seepage. However, the contaminant sources appear to be approximately midway between the northern creek and Live Oak Creek to the south. Please confirm the direction of shallow groundwater flow from the radioactive waste storage area.

7. Monitor wells must be screened across the entire saturated zone and no greater than 20 feet in length. Cluster wells must be installed if the saturated zone is greater than 20 feet thick, unless approved otherwise by the TNRCC.

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8. Please revise the WP to comply with Permit Provision VIII.A.2.b.(4). Provision VIII.A.2.b.(4) requires the Air Force to sample the groundwater during 3 sampling events spaced at 2 month intervals.
9. According to EPA's statistical guidance documents, 8 - 10 sediment samples are recommended rather than just seven, as proposed in Section 3.4.2.
10. The WP is somewhat confusing in that it proposes a study to establish background for the entire base and the WSA, as well as conduct an RFI at Parcel D. However, Section 3.0 (Project Scope and Objectives) in the Field Sampling Plan (FSP) indicates that sampling at the WSA will also be used to determine soils and groundwater have been impacted by activities at the site. As such, the study should either analyze for all Appendix IX constituents in accordance with Permit HW-50289, or provide justification for an abbreviated list.

The only justification we found for abbreviating the list of analytes for the WSA background study was in Section 2.2 of the FSP, page 2-3. The WP proposes to analyze for radium-226, radium 228, and Total Extractable Petroleum Hydrocarbons (TEPH). We also know that TCE was discovered at the Inspection Shop; however, we doubt Analytical Method E418.1 will be able to ascertain this constituent. Further justification is required to eliminate TCE from the list of analytes for determining whether a release has occurred.

In addition, please be aware that the Air Force is required to determine the extent of contamination at both the WSA and Parcel D if a release has occurred. This will require the Air Force to determine the volume of contaminated media by obtaining samples that are at or below background concentrations or the Practical Quantitation Limit (PQL).

11. Section 5.13 of the FSP proposed that purge water from the two existing wells and three new deep wells at the WSA will be discharged to the ground surface. Please be advised that if there is any potential for the water to be contaminated, then the water must be containerized until laboratory analyses confirm that it is not significantly contaminated. Significant contamination is anything in excess of background and/or PQL for inorganics and PQL for organics.

Soil cuttings from potentially contaminated areas, i.e., not background locations, must also be containerized until laboratory analyses indicate they do not contain contamination in excess of background and/or PQL. To spread contaminated soil over the site may result in the site becoming a deed recorded landfill that may require further corrective action.

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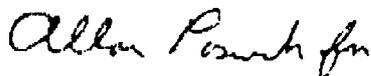
All investigative derived waste (soil, groundwater, debris, etc.) must be characterized in accordance with 30 TAC §335, Subchapter R for disposal. Contaminated media that does not exceed Risk Reduction Standard 2 contaminate levels may be transported for off-site disposal as non-hazardous waste; however, the analytical methods needed to demonstrate this are not the same as those required for a Subchapter R waste characterization.

12. In order to save the cost of analysis and disposal, we suggest low flow (100 to 200 milliliters per minute) groundwater sampling techniques. These techniques generate less waste water and are capable of providing a quality of unfiltered groundwater samples comparable to filtered samples.
13. We do not understand the value of collecting background groundwater samples from new monitor wells located in areas known to be contaminated by Air Force Plant 4 (AFP 4). The purpose of the basewide background study is to determine cleanup levels based on naturally occurring conditions. It is doubtful the Air Force Center For Environmental Excellence (AFCEE) WP will accomplish the objective.
14. The use of Upper Tolerance Limits (UTL) for establishing background is approved. However, Section 3.7 does not specify how site data will be compared to the background UTLs. We strongly suggest that AFCEE compare individual site datum to the UTL to determine compliance with the cleanup standard.

Please submit a revised WP which incorporates the above comments and concerns within 60 days of receipt of this letter.

If you have any questions or need further assistance with this matter, please contact Mr. Geoffrey Meyer in the Corrective Action Section in Austin at (512) 239-2577, mail code MC127, or via the e-mail address gmeyer@smtpgate.tnrc.state.tx.us.

Sincerely,



Paul S. Lewis, Manager
Corrective Action Section
Industrial and Hazardous Waste Division

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PL/GM

cc: Mr. Joel Sanders, Southern Division, Naval Facilities Engineering Command, P.O. Box
190010, North Charleston, SC 29419-9010
Ms. Stacy Gent, Department Head, Environmental Department/Code 110, Department of
the Navy, Building 1215, NAS JRB Ft. Worth, Texas 76127-6200
Mr. Ohlen Long, P.E., AFBCA, 6550 White Settlement Road, Ft. Worth, Texas 76114-
3520
Ms. Judith Black, USEPA Region 6
Mr. Tim Sewell, TNRCC Region 4 Office, Duncanville

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