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LETTER REGARDING REGULATORY REVIEW AND COMMENT ON CORRECTIVE ACTION  
AT SITE ST14 TO SUPPORT RISK BASED REMEDIATION NAS FORT WORTH TX  
11/8/1996  
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

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

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 313

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Dan Pearson, *Executive Director*



File: 07A-30  
A.F. 33/31

1996 NOV 15 PM 12: 06

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

November 8, 1996

Mr. Joseph R. Dunkle  
Team Chief  
Environmental 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 Final Remedial Action Plan for Risked-Based Remediation of Site ST14

### **Request for Revised Remedial Action Plan**

Dear Mr. Dunkle:

This letter is written in conjunction with Mr. Raymond Hillis' November 4, 1996, letter concerning above referenced Remedial Action Plan (RAP). Mr. Hillis is a coordinator for the Petroleum Storage Tank Division's Responsible Party Remediation Section (PST). As noted in Mr. Hillis' letter, it is the opinion of PST and the Industrial and Hazardous Waste Division's (IHW) Corrective Action Section that the remedial system proposed for the petroleum hydrocarbon spill at site ST14 (Solid Waste Management Unit (SWMU) 68) would not adequately manage the commingled groundwater contamination observed at site SD13. Site SD13 covers the soil and groundwater contamination associated with three SWMUs, including SWMU 64 (the French Drain), SWMU 67 (the Oil/Water Separator), and SWMU 64 (the Unnamed Stream, also known as part of SWMU 53, the Storm Water Drainage System). Of particular concern is the apparent impact on monitor wells near the Unnamed Stream and water quality in Farmers Branch.

In light of the above PST and IHW opinion, we request that the Air Force submit a revised Remedial Action Plan (RAP) for SD13. The RAP will expand upon the Air Force's interim corrective actions by addressing the following issues:

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1. Removal of the groundwater free product as evidenced by monitor well SD13-07;
2. Assessment of the risk posed by the Volatile Organic Carbons (VOCs) in the groundwater as evidenced by the groundwater contaminants observed in monitor wells OT12-MW15B and OT12-MW15C, and proposal of an appropriate corrective action;
3. Removal and/or decontamination of what remains of the French Drain system components, in accordance with 30 Texas Administrative Code (TAC) §335.555;
4. Assessment of the risk and proposal of appropriate corrective action to address the groundwater contamination observed as free product and/or as a degraded hydrocarbon plume;
5. Degradation of the water quality in Farmers Branch (as evidenced by iron staining along the northern shore of Farmers Branch) and an assessment of the risks to human health and the environment. Risks to human health should at least consider direct contact exposure resulting from recreational contact as well as impacts on public drinking water supplies in the West Fork of the Trinity River. Risks to environmental impacts should consider aquatic life. Remedial action should be included in the closure plan to address any unacceptable risks.
6. Future land use (we understand a portion of this area will be excessed to the public by the Air Force).

The issues listed above are for guidance only and are not meant to be comprehensive. It is the responsibility of the Air Force to address all relevant issues required by Hazardous Waste Permit HW-50289 and 30 TAC §335, Subchapters A and S. Please submit the RAP within 120 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@tnrcc.state.tx.us](mailto:gmeyer@tnrcc.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
- Mr. Michael W. S. Hayes, Esq., GM-0905-14//CAR(sel), JAGC, USNR Counsel, Office of the Asst. General Counsel, 4400 Dauphine St., New Orleans, LA 70146-5000
- Ms. Judith R. McCulley, USEPA Region 6
- Mr. Tim Sewell, TNRCC Region 4 Office, Duncanville
- Ms. Ginny King, Natural Resource Trustees, PCD Division (MC 142)

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**ADMINISTRATIVE RECORD**

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