

N83447.AR.000294
NAS FORT WORTH
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON GROUNDWATER
SAMPLING AND ANALYSIS PLAN AND BASEWIDE QUALITY ASSURANCE PROJECT PLAN
NAS FORT WORTH TX
12/16/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 679

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



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

December 16, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joseph R. Dunkle
Team Chief
Environmental Restoration Division
Air Force Center for Environmental Excellence
8001 Inner Circle Drive, Suite 2
Brooks AFB, TX 78235-5328

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. HW-50289
Groundwater Sampling and Analysis Plan, dated August 23, 1996, and
Base-Wide Quality Assurance Project Plan, dated August 20, 1996

Mr. Dunkle:

The Texas Natural Resource Conservation Commission (TNRCC) has received the submitted *Base-Wide Quality Assurance Project Plan*, dated August 20, 1996, and *Groundwater Sampling and Analysis Plan*, dated August 23, 1996. The Industrial and Hazardous Waste Permits Section has reviewed these documents for aspects specifically related to future Compliance Plan Ground-Water Monitoring and Corrective Action Programs, and offers the comments below. The Corrective Action Section has given concurrence with the comments, and upon completion of their review, may submit additional comments.

Due to the possibility of hiring multiple contractors in the future for the purpose of ground-water monitoring, lab analysis, and monitoring well inspection, please consolidate, for approval, all sampling and analysis procedures and forms into one concise Sampling and Analysis Plan (SAP). The core of this document should contain all information regarding field sampling and inspection procedures. Any specific information which can be found in the permit or compliance plan, such as sampling constituents, analytical methods, and well sampling schedules, should be included as attachments to the sampling and analysis plan. Since these are the areas most frequently changed in a permit and compliance plan, the use of attachments allows for a simple method by which to update the SAP, without including the core of the document in an official modification or amendment process.

Mr. Dunkle
Page 2
December 16, 1996

In addition to the comments above, the following deficiencies were noted:

- Please include a copy of the Health and Safety Plan, specifically those areas covering activities related to field sampling, as an attachment to the above described sampling and analysis plan;
- When utilizing micropurge methods, purging three (3) well volumes prior to sampling is not necessary. Rather, purge the water column at a low flow rate less than or equal to 0.3 liters/minute until in-line measurements of redox, dissolved oxygen, and turbidity have stabilized within 10% for at least two measurements.

If you have any questions or comments regarding this letter or the compliance plan, please contact Mr. Stephen Ormo of my staff at 512/239-2308, or if you will be responding by letter, please use Mail Code MC130.

Sincerely,



Ata-ur-Rahman, Supervisor
Permits Ground-Water Team
Industrial and Hazardous Waste Division

AR/SO/dr

cc: Mr. David Neleigh, Chief, EPA Region 6, Federal Facilities

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE