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LETTER REGARDING U S EPA REGION VI REVIEW AND COMMENTS ON DRAFT
BASEWIDE BACKGROUND STUDY NAS FORT WORTH TX
9/11/1997
U S EPA REGION VI

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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 338



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

File: 11A-76
A.F.

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SEP 9 1997 10:50 AM
SEP 11 AM 11:50

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Mark A. Weegar, Project Coordinator
Texas Natural Resource Conservation Commission
Industrial and Hazardous Waste Division
Corrective Action Section
Federal Facilities Team
P.O. Box 13087
Austin, TX 78711-3087

Re: Comments
Draft Base-Wide Background Study (Volumes I and II)
Naval Air Station Fort Worth Joint Reserve Base
EPA ID No. TX0571924042

Dear Mr. Weegar:

The U.S. Environmental Protection Agency (EPA) has performed a technical review of the U.S. Air Force's (USAF) document titled "Draft Base-Wide Background Study" (January 1997, Volumes I and II) for Naval Air Station Fort Worth (NAS FW) Joint Reserve Base (formerly Carswell Air Force Base). Enclosed for your review are EPA's comments on the Draft Background Study. These comments are being provided based on EPA's representation on the BRAC Cleanup Team for NAS FW.

This correspondence is concurrently being sent to USAF for their review and should not be considered as the final regulatory approval of the Draft Background Study. If you have any questions concerning our comments, please call me at (214) 665-7437.

Sincerely yours,

Rafael A. Casanova
Remedial Project Manager
BRAC Cleanup Team

Enclosure

cc: ✓ Mr. Olen R. Long (BEC/BTC)
Air Force Base Conversion Agency

U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS
U.S. AIR FORCE
DRAFT BASE-WIDE BACKGROUND STUDY
NAVAL AIR STATION FORT WORTH JOINT RESERVE BASE

The U.S. Environmental Protection Agency (EPA) has performed a technical review of the U.S. Air Force's (USAF) "Draft Base-Wide Background Study" (January 1997, Volumes I and II) for Naval Air Station Fort Worth (NAS FW) Joint Reserve Base (formerly Carswell Air Force Base). The following comments, on the Draft Background Study, are presented alphabetically and by the chapters, sections, and pages corresponding to the study.

COMMENTS

CHAPTER 1.0 - INTRODUCTION

A. Section 1.4.1 - Media Classification, Page 1-18:

USAF's Draft Background Study

USAF states that the Paluxy Aquifer was not evaluated for background concentrations due to the fact that previous investigations have not indicated any impact from past installation operations.

EPA's Comments

USAF may be required to evaluate the Paluxy Aquifer for background concentrations if the results of the ongoing and/or planned RCRA Facility Investigations indicate any impact from past installation operations.

CHAPTER 2.0 - BACKGROUND SAMPLING PROGRAM

B. Section 2.1.1 - Soil Probes in Terrace Alluvium, Page 2-1:

USAF's Draft Background Study

USAF references Plate 1 (Background Soil Sample Locations) which shows the locations of the soil probes and the horizons [Horizon A and B] sampled at each location.

EPA's Comments

Soil sampling location BJETA519 was placed immediately adjacent to the Recreational Vehicle Family Camping Area. This area was recently investigated by USAF due to the possibility of contamination from a leach field and uncontrolled disposals of motor oils, cleaning fluids, and household-type wastes. USAF should reevaluate the appropriateness of this sampling location in determining site-wide background concentrations based on EPA's comments to the Texas Natural Resource Conservation Commission (TNRCC) concerning the "Draft Site Characterization Report for the Recreational Vehicle Family Camping and Fuel Pipeline Areas." EPA expects to provide comments to the TNRCC in the near future.

CHAPTER 4.0 - BACKGROUND CHARACTERIZATION

C. Section 4.2.5 - Outlier Identification, Page 4-10:

USAF's Draft Background Study

USAF states that statistical outliers were not rejected, modified, or otherwise excluded from the data sets solely on the basis of an outlier test. USAF states that any changes to data sets were made if the data validation process or other review of the data indicated problems with the data.

EPA's Comments

EPA agrees that no data should be discarded from the data sets solely on the basis of a statistical test, since there is a possibility that an outlier test could incorrectly identify datum as an outlier. EPA also agrees that any outliers that are obvious mistakes (e.g., transcription errors) should certainly be corrected. Nevertheless, USAF should provide a plausible explanation for the presence of any outliers identified in the data sets and should consider excluding these outliers from the data sets if no explanation can be found. USAF should examine the effect on final analysis procedures applied to the data sets when the outliers are both included and excluded, and should provide an explanation of the major effects in the Background Study.

D. Table 4-6 - Summary of Background Values for Stream Sediment Samples, Page 4-17:

USAF's Draft Background Study

Table 4-6 lists the Upper Tolerance Limits (UTL) calculated for each of the inorganic constituents found in stream sediment samples.

EPA's Comments

Most of the inorganic UTLs reported for stream sediments seem reasonable; however, for some constituents the UTLs appear inflated. One reason could be the high standard deviations noted for several of these constituents which are indicative of a high variability in the corresponding data sets. The UTLs for aluminum, copper, iron, lead, molybdenum, nickel, and thallium seem to be the constituents most affected by this high variability. Of these constituents, copper, lead, and nickel are of ecological concern. Therefore, EPA recommends that USAF consider the use of the maximum detected values of these constituents for use as background concentrations.

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