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NAS FORT WORTH  
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LETTER REGARDING U S EPA REGION VI COMMENTS ON DRAFT RCRA FACILITY  
INVESTIGATION REPORT FOR SANITARY SEWER SYSTEM NAS FORT WORTH TX  
2/6/1998  
U S EPA REGION VI

File: 17G  
A.F.



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

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 4/6



FILE # 1  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

File: 17A-77  
P.W. 416

February 6, 1998

Mr. Mark A. Weegar, Project Coordinator  
Federal Facilities Team  
Corrective Action Section  
Pollution Control Division, MC-127  
Texas Natural Resource Conservation Commission  
P.O. Box 13087  
Austin, Texas 78711-3087

Dear Mr. Weegar:

The Environmental Protection Agency (EPA) has reviewed the document, "Draft RCRA Facility Investigation Report, Sanitary Sewer System, Naval Air Station Fort Worth Joint Reserve Base Carswell Field, Texas (formerly Carswell Air Force Base) September 1997".

Based on this review, EPA offers the following comments:

1. The report indicates that a large number of samples were collected from areas with known contamination (how this is known is not clear in the report) and some of the hazardous constituents detected in samples are then excluded, due to sample locations. Why were samples collected from these areas? The decision to address these contaminants under another investigation needs to be explained. This includes both soil and groundwater samples.
2. The TCE and hydrocarbon plumes need to be better defined across NAS Fort Worth, at the very least at any property scheduled to be transferred to the local redevelopment authority. If not done under this investigation, this will have to be done before the property can be transferred.
3. Low concentration of petroleum hydrocarbons at sample location MH 11B are noted on page 20 of 39. There is no known source of this contamination. Please describe any plans to investigate this area of the line.

4. Along sewer line segments 11 and the segment leading from the 301st TFS arsenic concentrations indicate a possible release from these segments of the sewer line. Are there plans to investigate the lines to determine if any breaks exist?

5. The source of the MEK found in the sample from ST14MW-24 needs to be investigated further.

6. Although samples have been collected at the OWSs, an OWS cannot be considered as closed until they are removed and confirmation sampling indicates no release in the soils beneath and adjacent to the units.

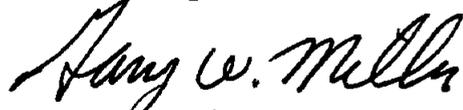
7. Any contamination that is suspected to be from sampling equipment must be fully explained. Provide additional backup to your decision on the toluene contamination from the direct push samples.

8. Chapter 4.0, Page 3 of 39 discusses results for near-surface soil pesticide/PCB compounds. Alpha-chlordane and gamma-chlordane were detected in soil sample MS1436 at levels of 2.4 mg/kg and 4.5 mg/kg, respectively. While these pesticide levels may have nothing to do with the sanitary sewer system they are above the Region 6 human health media specific screening level for chlordane in soil planned for industrial use (1.5 mg/kg) and the g-chlordane is above the TNRCC RRS2 soil/air and ingestion standard for chlordane in soil planned for industrial use (4.4 mg/kg). Are these contaminants being investigated for another site? The third to last sentence in this paragraph states, "The concentrations of these near-surface soil pesticides do not exceed 5.0 mg/kg...." What is 5.0 mg/kg? Is this a specific screening level for contaminants at Carswell AFB?

9. Chapter 4.0, Page 24 of 39 discusses the presence of vinyl chloride in several wells. The last paragraph on this page identifies monitoring well WITCTA031 as having a detected level of vinyl chloride of 2.2  $\mu\text{g}/\text{l}$  and states that this well is not located near the previously defined lobes of the AFP4 groundwater plume. The monitoring wells WITCTA021 and WITCTA035 had vinyl chloride levels of 9.9  $\mu\text{g}/\text{l}$  and 4.8  $\mu\text{g}/\text{l}$ , respectively and also do not appear to be within the previously defined lobes of the AFP4 groundwater plume as identified on Figure 4-9. Do these two wells identify the "new" eastern boundary for the AFP4 groundwater plume or might they be part of some previously unidentified contamination? These three wells appear to be in fair proximity to each other.

Please contact me at (214)665-8306 should you wish to discuss this further.

Sincerely,



Gary W. Miller  
Senior Project Manager  
Base Closure Team

cc: ✓ Mr. Olen R. Long, (BEC/BTC)  
Air Force Base Conversion Agency  
Naval Air Station Fort Worth

cc: Mr. Charles A. Rice  
HQ AFCEE/ERB

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**ADMINISTRATIVE RECORD**

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