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NAS FORT WORTH
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LETTER REGARDING U S EPA REGION VI REVIEW AND COMMENTS ON FINAL RCRA FACILITY INVESTIGATION FOR OFFSITE WEAPONS STORAGE AREA NAS FORT WORTH TX
8/23/1999
U S EPA REGION VI

503 0 File: 17G
P.W.

NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 503

503 1 File: 17A-78
P.W.
SWR # [illegible]
503
CAS # 5552
PROJ. MGR MW.

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

August 23, 1999

RECEIVED
AUG 31 1999
REMEDIATION DIVISION
Corrective Action Section

Mr. Mark A. Weegar
Corrective Action Section
Remediation 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, "Final RCRA Facility Investigation of the Offsite Weapons Storage Area at NAS Fort Worth Joint Reserve Base Carswell Field, Texas." This report was received by EPA on July 26, 1999. Based on this review, EPA provides the following comments:

1. **Page 1-19, 1.3.2.7 Background Study.** Two monitoring wells were installed as part of this study, one of these is offsite. These wells should be properly closed by the Air Force prior to transfer of the property.

2. **Page 1-20, 1.4.3 Clearance of the EOD Range.** The comment at the end of this paragraph, concerning future use of this area indicates that some type of deed restriction may be needed to restrict future land uses. During a recent site visit various small arms and metallic items were observed. It appears these items are coming to the surface from erosion of the surface soils. Since the last sentence indicates "EOD personnel should be contacted if the land is to be sued for a purpose other than livestock grazing or for other activities which would result in disturbing the ground below a depth of 1 foot", additional clearance of this site appears warranted.

3. **General Comment.** The ecological risk assessment should include the exposure or diet information for all the receptors. This is not included in the body of the report, nor in Appendices R and S.

4. **Page 2-34, 2.4.3 Methodology for Risk Evaluation.** A 1% frequency of detection is stated as being the determination of carrying forward a chemical through the risk-based screening process. Where did the 1% come from? EPA generally uses less than 5% detected in at least 20 samples.

5. **Page 4-10, 4.3.1 Potential Human Receptors.** Fish consumption is stated as being a plausible exposure route, yet the risk assessment does not address this pathway.

6. **Page 5-6, 5.1.3 Cleanup Levels Development and Screening.** The document relies upon the Texas MSCs as providing clean-up levels for all exposure pathways. The Texas numbers do not address exposure during showering and do not address fish consumption. These pathways are identified by Carswell as valid pathways. The risk assessment, therefore, needs to develop risk-based numbers for these pathways and compare site contamination. The risk assessment is focused upon meeting RRSN1 or RRSN2 values. The base must meet both EPA and TNRCC requirements.

7. **Table 5-3, Applicable RRSN2 MSCs and Promulgated Standards for the COPCs.** The column labeled, "Texas Surface Water Quality Standards" should have more values listed. Table 3 of the Texas Surface Water Standards (WQS) has standards for several of the chemicals that are left blank on the Carswell table. TNRCC also has standards for the protection of aquatic life found in the WQS in Table 1. Since these values are ARARs, the risk assessment must compare these values to the data developed by Carswell for the appropriate exposure pathway.

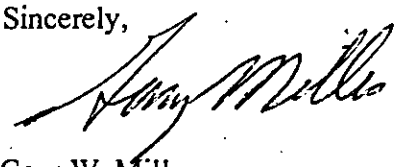
8. **Table 5-17, Ratio of Site Land Areas to Animal Home Ranges.** This table depicts the ratio of the individual land area of the specific site with the home range of the receptor. This is probably inappropriate as it assumes that the small areas are independent of the others. In other words, it assumes a small area of contamination with pristine conditions surrounding it and that the home range of the receptor only comes into contact with contamination at the particular listed area. Several of these small areas are next to other contaminated areas.

9. **Table 5-18, Level C Screening Assessment of Wildlife.** Because of the above defined flaw, the column labeled, "HQ adjusted for home range" is not useful in assessing ecological risks.

10. **Page 6-15, 6.1.3 Ecological Evaluation Conclusions.** The summary justifies that no action is required because of the small acreage affected and the lack of ecologically critical species. These two justifications are flawed. In other comments, the way home range was compared, is not useable and the term "ecologically critical" is neither defined nor recognized by EPA as valid.

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

Sincerely,



Gary W. Miller
Senior Project Manager
Base Closure Team

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