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LETTER CONFIRMING INCORPORATION OF REGULATORY COMMENTS IN FINAL
OPERATING PROPERLY AND SUCCESSFULLY DEMONSTRATION OF
TRICHLOROETHENE PLUME IMPACTING PROPERTY NAS FORT WORTH TX
1/25/2007
AIR FORCE REAL PROPERTY AGENCY



CARSWELL AFB TEXAS

ADMINISTRATIVE RECORD COVER SHEET

AR File Number _____ 737



January 25, 2007

AFRPA/COO-Kelly
143 Billy Mitchell Blvd, Suite 1
San Antonio, TX 78226-1816

Mr. Noel Bennett
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Ste 1200 (6PD-F)
Dallas, TX 75202-2733

RE: Final Operating Properly and Successfully (OPS) Demonstration Report of the Trichlorethene Plume Impacting the BRAC Property
Former Carswell Air Force Base (AFB), Texas
EPA ID No. TX0571924042

Dear Mr. Bennett,

We respectfully submit three copies of the subject report for your review and approval. Responses to your August 29, 2006 comments on the draft OPS Determination Report are provided at Attachment 2. As to your comment on whether the Texas Commission on Environmental Quality (TCEQ) reviewed the document and provided comment – the report was provided to the TCEQ but Mr. Mark Weegar indicated via email that he would defer review of the report to your office. The report has been revised to address Mr. Abshire's comments dated November 10, 2006.

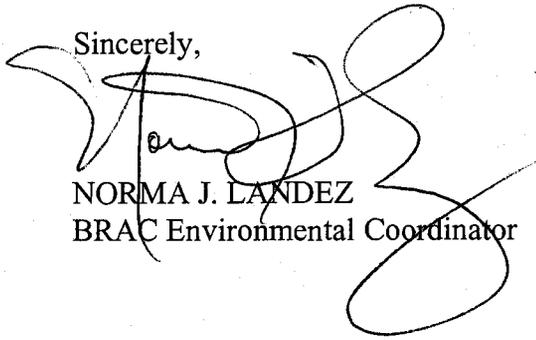
As noted at the November 16, 2006 BRAC Cleanup Team meeting and in your subsequent email dated November 17, 2006, the subject report has been revised to show that Building 225 on the Golf Course Parcel will be used for residential purposes. The Westworth Redevelopment Authority (WRA) will use the building as a residence for the golf course supervisor. As shown in the figures provided in the Final OPS Demonstration Report, the area where Building 225 is located has not been impacted by the TCE plume thus vapor intrusion is not a factor. Results of a vapor intrusion investigation conducted using passive soil gas and included in the Soil Gas Addendum of the Baseline Risk Assessment conducted for the BRAC property indicate there is no impact from groundwater contamination. The lead-based paint issue with respect to residential use will be addressed in the corresponding Finding of Suitability to Transfer (FOST).

The Draft Final FOST for the Golf Course Area at former Carswell AFB has been revised to reflect comments received on the draft OPS determination report and the draft FOST. On January 18, 2007, the WRA requested we review an additional three acres of the property to

determine if residential use can be considered. The Draft Final FOST will be submitted to you when we complete our review of the WRA's request and make any required changes to the FOST. The WRA's request will not require revisions to the subject report.

As indicated in your comments, we understand you will not approve the subject report until the Air Force Plant (AFP) 4 Explanation of Significant Difference (ESD) has been approved. Based on the November 2006 meeting held with the AFP 4 RPM, we believe approval of the ESD is imminent. We would greatly appreciate your review and preliminary approval of the subject report on the condition that the AFP 4 ESD is approved. Your preliminary approval will allow us to move forward with preparation of the draft deed and coordination of the documentation with the WRA and our management counterparts. If you have any questions or require further information, please contact me at (210) 925-3100, ext 311 or by email at norma.landez@afropa.pentagon.af.mil.

Sincerely,



NORMA J. LANDEZ
BRAC Environmental Coordinator

Attachments:

1. Final OPS Demonstration Report
2. Response to Comments

cc:

TCEQ (M. Weegar)

RESPONSES TO COMMENTS
DRAFT OPERATING PROPERLY AND SUCCESSFULLY
DEMONSTRATION REPORT OF THE TRICHLOROETHENE PLUME
IMPACTING THE BRAC PROPERTY
AT THE FORMER CARSWELL AFB, TEXAS

Reviewer comments provided by Noel Bennett of the USEPA on August 29, 2006

Comment 1 *In order for the U.S. Environmental Protection Agency (EPA) to determine if the institutional controls are in place and functioning, a more detailed description of the controls that will be in place at transfer should be included (preferably with a copy of the enforceable instruments documenting the controls included as an appendix), as well as a description of any monitoring and enforcement activities. Since this property will change ownership in a deed transfer, the instrument implementing institutional controls will presumably change from a lease to a deed. Please provide for review and approval and include in the OPS demonstration acceptable deed language implementing the institutional controls for the property. The OPS demonstration must also include a discussion of the Air Force's plans and ability to monitor and enforce the institutional controls after the property is transferred. The institutional controls should specifically prohibit subsurface excavation, digging, etc. unless the Air Force determine that there will be neither adverse impacts on the cleanup process nor unacceptable risk to human health or the environment. The risk assessment summarized in the OPS indicates a risk to construction workers in a trench from exposure to groundwater. The institutional controls should address health and safety requirements for worker safety for such a scenario.*

Response **As discussed with EPA, a copy of the deed will be provided to TCEQ.**

Comment 2 *A significant component of the remedy is the long-term monitoring of the TCE ground water plume impacting the BRAC property. The report needs to demonstrate that the ground water monitoring program is already in place and operating properly and successfully. Describe/summarize the details of the ground water monitoring program that is in place that provides the basis for the monitoring. The appropriate documents that provide the basis for the program should be cited/referenced, including the work plan, field sampling plan, frequency of sampling, etc. Particularly, focus on the monitoring plans that are in place for the southern lobe of the TCE plume and the permeable reactive barrier (PRB).*

- Response** **Details associated with the LTM of southern lobe TCE plume will be incorporated as suggested.**
- Comment 3** *Page ES-3, Remedial Action Objectives, First Paragraph: Clarify the citation/reference for the June 2005 Human Health Risk Assessment and Ecological Risk Assessment that are mentioned. Were there separate documents produced for these risk assessments or were these risk assessments included as portions of the Focused Feasibility Study report?*
- Response** **The baseline Human Health Risk Assessment and baseline Ecological Risk Assessment were produced under separate cover; however, a summary of the results are presented in the June 2005 Focused Feasibility Study report. Specific details regarding how these assessments were performed are included in the Final Baseline Risk Assessment and addenda (Ecological Risk Assessment Addendum and Soil Gas Addendum). The appropriate report references will be added to the subject paragraph and “in June 2005” will be removed from the first sentence to prevent further confusion.**
- Comment 4** *Page ES-5, Number 3 RAO: The reference to the Region 9 PRG table should be deleted as this table is no longer updated and maintained. Instead, the Region 6 Medium-Specific Screening Levels (MSSL) table should be referenced.*
- Response** **The preliminary remediation goals presented in the executive summary are site-specific calculated values based on the Final Focused Feasibility Study and are not associated with Region 9. The referenced sentence will be revised to read, “Prevent construction workers from being exposed to TCE, cis-1,2-DCE, and vinyl chloride at concentrations above the calculated risk-based preliminary remediation goals (PRGs).”**
- Comment 5** *Indicate whether or not the Texas Commission on Environmental Quality (TCEQ) reviewed the documents and had any comments.*
- Response** **TCEQ was provided the Draft Operating Properly and Successfully Demonstration Report for review.**

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE