

Code 189

*W*  
*MSB*  
*Thank.*  
*Case*  
**MEMORANDUM**

To: Code 18

From: Code 189

Date: 29 Jun 1995

Subj: RCRA FACILITY INVESTIGATION WORKPLAN

Ref:

- (a) TNRCC ltr dated 26 May 1995, subject: Approval with Modification
- (b) RCRA FACILITY INVESTIGATION WORKPLAN DATED SEP 1994

1. Per reference (a), the following sites are removed from reference (b):

SWMU 1 (DPDO Landfill), SWMU 2 (CCAD Liquid Waste Disposal Area), SWMU 4 (Aircraft Fire Training Area), and SWMUs 244-264 (Bldg 8) will be investigated under the US Navy's Installation Restoration Program (IRP).

SWMU 10, the Radioactive Waste Disposal Area near the north gate, has been omitted for reference (b). Reference (a) states "...further investigation under the RFI is not warranted at this time."

SWMU 196, the Hospital Low-level Radioactive Storage Bins, have been removed from reference (b). Reference (a) states "The Navy Radiation Safety Committee completed a review of the radiation and contamination survey and Radioactive Material Permit No. 42-00285-11NP was terminated May 18, 1993. Because this unit has been closed by the Navy Radiation Safety Committee, the TNRCC Federal Facilities staff agrees that further investigation is not warranted."

SWMUs 277-298, the Bead Blasting Waste Collection Pans, do not require further investigation at this time. Reference (a) states "...TNRCC Federal Facilities and Region 14 staff agree that further investigation is not warranted at this time. However, should future activities indicate a release, or the potential for a release, of hazardous waste or hazardous constituents to environmental media, NAS shall notify the TNRCC as per permit provisions...and conduct any required investigation and/or corrective action."

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**SWMU 355, the Low-level Radioactive Storage Building, does not require further action at this time. Reference (a) states ...TNRCC Federal Facilities staff agrees that further investigation is not warranted at this time. However, should future activities indicate a release, or the potential for a release, of hazardous waste or hazardous constituents to environmental media, NAS shall notify TNRCC...and conduct any required investigation and/or corrective action."**

**SWMU 357, Tank 305 (Waste Solvent UST), will be removed from reference (b). Reference (a) states "TNRCC Federal Facilities staff concurs with the recommendation to incorporate this site into the LPST investigation. However, should NAS or the TNRCC determine that investigation or corrective action under the PST Program is inappropriate, NAS shall comply with permit provisions."**

**2. The following SWMUs will be included in the final RFI report:**

**SWMU 9: North Gate Disposal Area.**

3 groundwater samples from existing wells  
Estimated cost: \$ 9,000

**SWMU 183: DRMD Storage Area.**

4 soil borings drilled to groundwater (5 to 15 feet each)  
Estimated cost: \$16,000

**SWMU 265: Building 180B CCAD Activities, Floor Sewer.**

1 soil boring drilled to groundwater (5 to 15 feet)  
Estimated cost: \$ 5,000

**SWMU 274: Area Storm Sewer (CCAD).**

1 sediment sample from maintenance manhole  
1 water sample will be collected during a discharge event  
Estimated cost: \$ 5,000

**SWMUs 310-315: BSTP Sludge Drying Beds 1-6.**

3 soil borings at a depth of 3 feet using a hand auger  
Estimated cost: \$ 6,000

**SWMUs 334-348: Industrial Wastewater Treatment Plant.**

4 soil borings drilled 15 to 20 feet (5 feet into upper most aquifer) and converted into groundwater monitoring wells.  
Estimated cost: \$18,000

Contingencies \$21,000

**TOTAL ESTIMATED INVESTIGATION COST: \$80,000**

3. A background study shall be performed for the facility  
10 soil borings drilled 6 feet deep terminating just  
above the uppermost aquifer

5 soil borings drilled 15 feet deep or 2 feet into the  
impermeable layer beneath the uppermost aquifer and  
converted into groundwater monitoring wells.

Estimated drilling costs:  $\$10,000 + \$10,000 = \$20,000$

Estimated analytical costs:  $\$30,000 + \$30,000 = \$60,000$

Contingencies:  $\$10,000$

TOTAL ESTIMATED BACKGROUND COST:  $\$90,000$

4. The total cost for preparing the final report is estimated to  
be  $\$25,000$ .

5. The total cost for the background study, investigation and  
final report is estimated to be  $\$195,000$ . The background study  
and investigation ( $\$170,000$ ) will be completed in FY 96 and the  
final report ( $\$25,000$ ) shall be completed in the first quarter of  
1997.

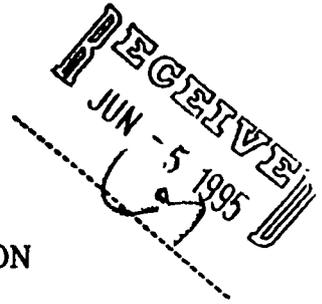
*James D. Boatman*  
*John A. Young*  
James D. Boatman, P.E.  
John A. Young

*Commander* *J. P.* *Thanks.* *Good night*

WE HAVE THIS WORK IN OUR BUDGET SUBMISSIONS  
TO CNATRA. IT IS CRITICAL THIS WORK BE DONE  
ON SCHEDULE. THREE PSDIV REPS ARE COMING  
IN SEPTEMBER TO DISCUSS THIS MATTER. I WILL  
LET YOU KNOW WHEN THEIR VISIT DATE IS SET

*V/R*  
*TER*

John Hall, *Chairman*  
Pam Reed, *Commissioner*  
R. B. "Ralph" Marquez, *Commissioner*  
Dan Pearson, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

May 26, 1995

Commanding Officer  
Attn. Mr. Terry Boone  
Code 189  
NAS Corpus Christi  
11001 D Street, Suite 143  
Corpus Christi, Texas 78419-5021

Re: U.S. Department of the Navy  
Naval Air Station, Corpus Christi, Texas  
EPA I.D. No. TX7170022787  
Permit No. HW-50038; SWR No. 30479  
Review of RCRA Facility Investigation Workplan, dated  
September 29, 1994

### APPROVAL with MODIFICATIONS

Dear Sir:

On October 3, 1994, the Texas Natural Resource Conservation Commission (TNRCC) Federal Facilities Team received a revised version of the RCRA Facility Investigation (RFI) Workplan, Naval Air Station, Corpus Christi (NAS-CC), Texas, dated September 29, 1994. The TNRCC Federal Facilities Team and Region 14 staff have completed a review of the revised RFI Workplan. Based on the information provided in the workplan and discussions during a meeting held on September 8, 1994, the RFI Workplan is approved contingent upon incorporation of the following modifications:

1. Please provide a plan view drawing with a scale of 1"=200' which includes all required information as described in Permit Provision VII.A.1. (a)-(d).
2. Lines of proposed geologic cross-sections should be indicated on diagrams where appropriate as required by Permit Provision VIII.A.2.b. (5) (a).

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**RFI Workplan: Section II.A - Selection of Solid Waste Management Units (SWMU)**

3. Investigations have been conducted at SWMUs 1, 2, 4, and 244-264 (Bldg. 8) under the US Navy's Installation Restoration Program (IRP). The investigation at each of these SWMUs has progressed beyond the initial phase of the RFI described in Permit Provision VIII. Therefore, TNRCC Federal Facilities and Region 14 staff agree with NAS-CC's proposal to omit these SWMUs from the subject RFI Workplan. Documentation concerning the investigation activities at SWMUs 1, 2, 4 and those associated with Bldg.8 will be reviewed by TNRCC Federal Facilities and Region 14 staff and addressed by separate correspondence.

NAS-CC has provided documentation which describes the unsuccessful efforts to locate SWMU 10. Based on the information available, TNRCC Federal Facilities and Region 14 staff agree that further investigation under the RFI is not warranted at this time. Should the actual location of SWMU 10 be confirmed, NAS-CC shall provide written notification to the Executive Director of the TNRCC and to the TNRCC Region 14 Office in Corpus Christi.

NAS-CC has completed closure of SWMU 196. The Navy Radiation Safety Committee completed a review of the radiation and contamination survey and Radioactive Material Permit No. 42-00285-11NP was terminated May 18, 1993. Because this unit has been closed by the Navy Radiation Safety Committee, the TNRCC Federal Facilities staff agrees that further investigation is not warranted.

NAS-CC has recommended no further action at SWMUs 277-298. Based on descriptions provided in the RFI Workplan and information provided in the RCRA Facility Assessment (RFA) dated December 12, 1992, TNRCC Federal Facilities and Region 14 staff agree that further investigation is not warranted at this time. However, should future activities indicate a release, or the potential for a release, of hazardous waste or hazardous constituents to environmental media, NAS-CC shall notify the TNRCC as per Permit Provision V.J. - **Releases** and conduct any required investigation and/or corrective action.

NAS-CC has recommended no further action at SWMU 355. Based on the available information, descriptions of waste stored in this unit and the low potential for a release to environmental media as described in the RFA, TNRCC Federal Facilities staff agrees that further investigation is not

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warranted at this time. However, should future activities indicate a release, or the potential for a release, of hazardous waste or hazardous constituents to environmental media, NAS-CC shall notify the TNRCC as per Permit Provision V.J. - Releases and conduct any required investigation and/or corrective action.

NAS-CC has requested, in the RFI Workplan, to incorporate SWMU 357 into the ongoing adjacent Leaking Petroleum Storage Tank (LPST) investigation. In discussions with TNRCC Region 14 staff, an LPST Identification Number will be assigned to this site. At this time, TNRCC Federal Facilities staff concurs with the recommendation to incorporate this site into the LPST investigation. However, should NAS-CC or the TNRCC determine that investigation or corrective action under the PST Program is inappropriate, NAS-CC shall comply with Permit Provision VIII.

4. Chemical analysis for Semi-Volatile Organic Compounds (SVOC) discussed in the footnote on page II.6 of the RFI Workplan should be corrected. SVOC analysis shall be conducted on 20% of samples which indicate Total Petroleum Hydrocarbons (TPH) concentrations below the established background values.

#### Background Conditions

5. Please provide a map which indicates the location of all proposed background sample locations.
6. Please indicate the number of soil and groundwater samples which will be collected for background purposes.
7. A separate background study report shall be submitted for TNRCC review prior to submittal of the RFI Report.
8. The background data collected during the IRP investigations should be reevaluated. If appropriate, the IRP background data may be combined with the RFI background data to increase the sample population for statistical analysis. This may also help to shorten the time required to conduct the background study as outlined in the RFI Schedule.
9. Analysis of background samples should include cyanide and phenol. The list of constituents on page II.7 should be updated.

**RFI Workplan: Section III**

10. According to the RFI Workplan samples collected from SWMUs 183, 265, 274, 310-315, 334-348, and 9 will be analyzed for Copper, Zinc, and Nickel when analytical results indicate the presence of RCRA Metals at concentrations greater than the established background. Copper, Zinc, and Nickel should be added to the list of constituents for each of these units. Decisions to conduct Copper, Zinc, and Nickel analysis should be based upon site information/records and should not be dependent upon the concentrations of the RCRA Metals.

Chemical analysis of samples collected from SWMUs 310-315 should include all parameters as described in Section II.D of the RFI Workplan.

Chemical analysis of samples collected at SWMUs 334-348 should also include total cyanide and phenols.

11. The RFI Workplan indicates SWMUs 337 and 338 will be closed in accordance with TNRCC Regulations. If the RFI activities are not conducted, NAS-CC is required to submit a closure plan and comply with all provisions in 30 Texas Administrative Code (TAC) 335.8 - Closure and Remediation.
12. Figure III.8 is referenced on page III.5, but is not included in the RFI Workplan. Please correct this discrepancy.

**RFI Workplan: Section IV - RFI Schedule**

13. Five months for contractor selection is not an RFI activity and should not be part of this schedule. Ten months for the background study seems excessive and should be shortened. Please submit a revised schedule for TNRCC review and approval prior to initiating any RFI activities. NAS-CC shall submit a permit modification requesting an extension if the RFI can not be completed in 12 months as required by Permit Provision VIII.A.4. Please submit a revised schedule of RFI activities.

**RFI Workplan: Section V**

14. Regulations contained in 31 TAC 287 are now under 30 TAC 338. Please make this revision to the RFI Workplan.

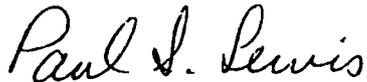
Prior to initiating the RFI activities, NAS-CC shall submit a final RFI Workplan which incorporates the above referenced

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modifications. NAS-CC shall also be responsible for maintaining an adequate Health and Safety Plan during all RFI activities. The TNRCC Region 14 Office in Corpus Christi shall be notified in writing at least 10 days prior to conducting any RFI activities. Copies of all documents and correspondence shall also be submitted to Region 14 Office in Corpus Christi.

Should you have any questions or wish to arrange a meeting to discuss the issues in this letter please contact Roger Dockery, Federal Facilities Team at 512/239-2568, Mail Code MC-127.

Sincerely,



Paul S. Lewis, Manager  
Corrective Action Section  
Industrial and Hazardous Waste (I&HW) Division

PSL:rd

cc: David Harvey, TNRCC Region 14 Office, Corpus Christi  
Mark Craig, SOUTHNAVFACENCOM, North Charleston, SC  
David Neleigh, EPA Region VI, Chief, Federal Facilities and  
New Mexico Section  
Tennie Larson, I&HW Division, Corrective Action Section  
(CA150)