



DEPARTMENT OF THE NAVY  
NAVAL AIR STATION  
11001 D STREET SUITE 143  
CORPUS CHRISTI, TEXAS 78419-5021

SwR 30479  
Case Doc # 8862  
K Davis  
IN REPLY REFER TO  
5090  
Code 186

28 APR 2000

Texas Natural Resources Conservation Commission  
Corrective Action Section, MC-127  
P.O. Box 13087  
Austin, TX 78711-3087

Gentlemen:

SUBJECT: NOTICE OF INTENT (GRANDFATHERING)

Enclosed is Naval Air Station Corpus Christi's (NASCORPC) Notice of Intent for Grandfathering of several of the solid waste management units located at NASCORPC.

If you have any questions, please contact Luisiana Stevens at (361)961-3776.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Byerly".

D. BYERLY  
Environmental Manager  
By direction of  
the Commanding Officer.

Enclosure: 1. Notice of Intent (Grandfathering)

RECEIVED  
MAY 3 2000  
REMEDIATION DIVISION  
Corrective Action Section



Texas Natural Resource Conservation Commission  
**NOTICE OF INTENT (GRANDFATHERING)**

TNRCC Regulatory ID No.: SWR-30479

Page 1 of 4

Submit a copy of this form to both the applicable Remediation Division program area in the Austin Central Office as indicated below and to the appropriate TNRCC Region Office no later than April 30, 2000. This form will serve to notify of your intent to use pre-TRRP standards (grandfathering) to complete a response action or closure for a specific affected property.

Submittal Date: 4/28/00 TNRCC Region No.: 14

TNRCC Program (check one)

Corrective Action Section (Mail Code 127)

Superfund PRP Lead (Mail Code 143)

**On-Site Property Information**

On-Site Property Name: NAVAL AIR STATION CORPUS CHRISTI

Physical Address:

Street no. 11001 Pre dir. \_\_\_\_\_ Street name D Street type ST Post dir. \_\_\_\_\_

City CORPUS CHRISTI County NUECES County Code 178 Zip 78419-5021

Nearest street intersection or location description: INTERSECTION WHERE TX 358 TERMINATES AND NAS DRIVE BEGINS

Latitude: Degrees, Minutes, Seconds OR Decimal Degrees: (indicate) North 27° 42' 00"

Longitude: Degrees, Minutes, Seconds OR Decimal Degrees: (indicate) West 97° 17' 00"

**Affected Property**

Affected Property Name/No. for which this notice is NAS CORPUS CHRISTI

**Description of Release**

Provide a brief description of the release at the affected property and reason for filing this form:

On September 6, 1993, the Naval Air Station Corpus Christi (NASCORPC) received the Texas Natural Resource Conservation Commission (TNRCC) approved amendment to the site's 1988 RCRA Part B Permit. As part of the amendment, the TNRCC indicated NASCORPC must develop a RCRA Facility Investigation Workplan (RFIW) to determine whether past releases or practices from selected solid waste management units (SWMU) have negatively impacted human health or the environment. The final RFI, dated August 1995, included the following SWMUs:

- SWMU 9. North Gate Disposal Area
- SWMU 183. DRMO Storage Area
- SWMU 265. Building 1808 CCAD Activities, Floor Sewer
- SWMU 274. Area Storm Sewer (CCAD)
- SWMUs 310-315. SSTP Sludge Drying Beds 1-6
- SWMUs 334-348. Industrial Wastewater Treatment Plant
- SWMU 357. Tank 305 (Waste Solvent UST, per subsequent notification)

**RECEIVED**

**MAY 3 2000**

**REMEDIATION DIVISION  
 Corrective Action Section**

SWMU 1, 3, 4, and 8 are currently being investigated under the US Navy's Installation Restoration (IR) Program and will be conforming to TRRP. Because they were scheduled to be investigated under the IR Program, they were not included in the RFI. SWMU 274, Area Storm Sewer (CCAD) may be closed as part of the IR Program and will therefore also be closed according to TRRP rules and regulations.

Originally, SWMU 10, Radioactive Waste Disposal Area, was omitted from the RFI because NASCORPC had provided documentation which described unsuccessful efforts to locate SWMU 10 by scanning a 20 foot grid



Texas Natural Resource Conservation Commission  
**NOTICE OF INTENT (GRANDFATHERING)**

TNRCC Regulatory ID No.:

SWR-30479

Page 2 of 4

system, over an area measuring 200 feet by 200 feet, using a metal detector. Based on the information available, the TNRCC had determined that further investigation of SWMU 10, was not warranted at the time. However, later TNRCC suggested that an electronic survey be performed by Texas A&M- Corpus Christi using induction techniques. NASCORPC had the survey performed and based on review of the survey, it is NASCORPC's understanding that only a pipeline was found and SWMU 10 has still not been located. NASCORPC will recommend No Further Action to the TNRCC. If a response or closure is ever required for SWMU 10, the response or closure will be performed in accordance with Risk Reduction Rule Standard 1 or 2 (RRR).

SWMU 9, the North Gate Disposal area, was investigated in 1986 under the NACIP characterization program. In a letter, dated March 4, 1987, the Texas Water Commission concluded there was no need for remedial action at this site. However, the Commission requested sampling of each of the existing wells in conjunction with the RFI.

NASCORPC has completed sampling the three wells and is currently reviewing the analytical data. If a response or closure is deemed necessary, the response or closure will be performed in accordance with RRR.

SWMU 183, DRMO Storage Area, is a paved and fenced fourteen acre RCRA facility. Currently, two groundwater assessment programs are collecting data from numerous wells in the immediate area. Additional work proposed as part of the RFI was intended to supplement the previous and on-going monitoring program.

The RFI included four soil borings around the storage area drilled to depths between 5 and 20 feet depending upon depth to groundwater. The purpose of the soil borings was to provide site-specific information regarding the absence or presence of potential contaminants beneath the site. Due to the numerous groundwater monitoring wells surrounding the site, no additional wells appeared to be warranted.

The four soil borings were drilled and sampled. The analytical results were either non-detect or below background with the exception of mercury. Mercury had results between 0.1 ppm and 0.3 ppm. Background was determined to be <0.9 ppm. NASCORPC is currently reviewing all the groundwater and soils analytical data, pertaining to the area. If a response or closure is deemed necessary, the response or closure will be performed in accordance with RRR.

SWMU 265, Building 1808 Floor Drain, is connected to the Industrial Wastewater sewer line as determined by dye testing. A soil boring was drilled adjacent the floor drain to determine if there had been any releases to the surrounding soils. All analytical data was determined to be non-detect except for barium, lead, and zinc, which were all below background concentrations. NASCORPC will probably recommend No Further Action. However, if a response or closure is deemed necessary, the response or closure will be performed in accordance with RRR.

SWMUs 310-315, SSTP Sludge Drying Beds 1-6 have received sludge from the existing SSTP, which receive domestic inflows from NASCORPC. The RFI consisted of analyzing 3 samples from half of the sludge drying beds. Analytical data is currently being reviewed. If a response or closure are deemed necessary, the response or closure will be performed in accordance with RRR.

SWMUs 334-348, Industrial Wastewater Treatment Plant (IWTP), consist of several tanks, chambers, destruction units and lift stations that are related to or part of the wastewater treatment plant. Of these SWMUs, SWMUs 337 and 338 (Batch Phenol and Batch Cyanide Destruction Units), were not used for several years. The Batch Phenol Destruction unit, (SWMU 337) was never connected to the IWTP. SWMU 338 was removed from service and closed in place. Samples confirm that there has been no release to the environment from these two units. For these SWMUs, NASCORPC will probably recommend No Further Action. If a response or closure is deemed necessary, the response or closure will be performed in accordance with RRR.

Four soil borings were placed around the IWTP, sampled and converted to groundwater monitoring wells. Groundwater samples were also collected and analyzed. NASCORPC is currently reviewing the data and if a response or closure is deemed necessary, the response or closure will be performed in accordance with RRR.



Texas Natural Resource Conservation Commission  
**NOTICE OF INTENT (GRANDFATHERING)**

TNRCC Regulatory ID No.: SWR-30479

Page 3 of 4

Originally, SWMU 357, Tank 305, was not included in the final RFI because it would be incorporated into the LPST investigation. However, TNRCC later notified NASCORPC that SWMU 357 was supposed to be investigated under the RFI.

NASCORPC is still trying to determine the extent of contamination and direction of the plume from SWMU 357. A response and closure will be performed in accordance with RRR.

**Off-Site Affected Property Information**

Physical Address: N/A

Street no. \_\_\_\_\_ Pre dir. \_\_\_\_\_ Street name \_\_\_\_\_ Street type \_\_\_\_\_ Post dir. \_\_\_\_\_

City \_\_\_\_\_ County \_\_\_\_\_ County Code \_\_\_\_\_ Zip \_\_\_\_\_

**Contact Person Information**

Person (or company) Name: Naval Air Station Corpus Christi

Contact Person: Luisiana Stevens Title: Environmental Engineer

Mailing Address: 11001 D Street, Ste 143 (Code 186)

City Corpus Christi State: TX Zip: 78419-5021 E-Mail Address: Stevens.L.M@navdofgw.navy.mil

Phone: 361-961-3776 Fax: 361-961-3798



Texas Natural Resource Conservation Commission  
**NOTICE OF INTENT (GRANDFATHERING)**

TNRCC Regulatory ID No.: SWR-30479

Page 4 of 4

**Acknowledgement**

By my signature below, I am notifying the TNRCC as to the following intent.

Signature of Person *Diane R Byerly* Name (print) Diane R Byerly Date 4/28/00

**Notice**

Check the appropriate option:

I elect to continue under previous commission rules (i.e. Title 30, Chapter 335, Subchapters A and S, relating to Industrial Solid Waste and Municipal Hazardous Waste in General; Risk Reduction Standards, respectively) after May 1, 2000, and will conduct a Risk Reduction Rule (RRR) Standard 1 or 2 response action, (§335.8(c)(1) and (2)) relating to closures and remediation.

I elect to continue a response (either closure or remediation of a release) or remedial investigation under RRR Standard 3 (30 TAC §335.553(b)).

I elect to conduct a closure of units not subject to permitting, with or without associated releases. Closure can be conducted under pre-TRRP rules if the provisions of 30 TAC 350.2 (m) are met.

These include, for Standard 1 or 2 closures, filing a notice of intent by May 1, 2000 that the closure will proceed under Standard 1 or 2, confirming by May 1, 2001 that the agency received the notice in a timely manner, and completing the closure by May 1, 2005.

For closures under Standard 3, submit a fully compliant remedial investigation report by May 1, 2001.

I elect to voluntarily document my intent to continue a response (either closure or remediation of a release) or remedial investigation under an order specifying pre-TRRP requirements.

I elect to continue a closure under a permit that hasn't been renewed to conform to TRRP.