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LETTER FROM TEXAS COMMISSION ON ENVIRONMENTAL QUALITY REGARDING CONDITIONAL APPROVAL TO THE DRAFT FINAL SITE INSPECTION REPORTS FOR INCINERATOR DISPOSAL SITE, SKEET RANGE, AND PISTOL RANGE NAS CORPUS CHRISTI TX
05/16/2009
SIEGEL, C

Buddy Garcia, *Chairman*
Larry R. Soward, *Commissioner*
Bryan W. Shaw, Ph.D., *Commissioner*
Mark R. Vickery, P.G., *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 16, 2009

Mr. Dalton Shaughnessy
NAVFAC SE (OPG6)
PO Box 30, Bldg 103
NAS Jacksonville
Jacksonville, Florida 32212-0030

Re: Conditional Approval to the Draft Final Site Inspection Reports for the Incinerator Disposal Site, the Skeet Range, and the Pistol Range
U.S. Department of the Navy, Naval Auxiliary Landing Field Cabaniss
Corpus Christi, Texas
TCEQ Facility ID No. T1983

Dear Mr. Shaughnessy:

The Texas Commission on Environmental Quality (TCEQ) has received the Draft Final Site Inspection Reports for the Naval Auxiliary Landing Field Cabaniss. The Incinerator Disposal Site and the Skeet Range are required to proceed to a remedial investigation. Please see the attached comments for the Incinerator Disposal Site that will be required to be addressed in the remedial investigation. The Pistol Range will be accepted as complete with no further action provided the attached comments are addressed to the satisfaction of the TCEQ and the Environmental Protection Agency.

Questions concerning this letter should be directed to me at (512) 239-2992. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127 with an additional copy submitted to the local TCEQ Region Office. The information in the reference block should be included in all submittals.

Sincerely,

Ada Lichaa for Chris Siegel

Chris Siegel, Project Manager
VCP/CA Section
Remediation Division

CS/cjh

cc: Waste Program Manager, TCEQ Region 14 Office, Corpus Christi

Comments for the Incinerator Disposal Site

1. Oso Creek is a tidal stream according to the 2008 Texas Water Quality Inventory Water Bodies Evaluation (March 19, 2008). Therefore, according to TRRP-24, the Aquatic Life Surface Water RBELs for Saltwater Acute and Chronic and Human Health Surface Water RBELs for Saltwater Fish would apply.

2. There is aquatic life in Oso Creek and people catch fish from Oso Creek downstream of Cabaniss; therefore, aquatic life and human health that consume the aquatic life need to be protected.

3. Since the background sample and site specific sample analytical results for some of the metals exceed the RBELs, some surface water samples should be collected just upstream of NALF Cabaniss to serve as background samples during the RI. It may be prudent to take sediment samples upstream of NALF Cabaniss also to serve as background samples.

4. Please modify Table 29 of Appendix C to agree with the EHE Rating of C as documented in Table 10 of the Site Inspection Report for the Incinerator Disposal Site.

Comments for the Pistol Range

1. In Section 3.4.2 Surface Soil Sample Collection – Pistol Range, the report states "locations sifting was not conducted due to the nature of the soil (i.e. clayey) or because was wet (due to rain events). Each of the samples was analyzed in the field using a calibrated XRF detector." Please explain if a wet sample affects the results of the XRF screening.

2. For the Pistol Range, please explain how it was determined which surface soil samples were to be analyzed in the laboratory. Section 3.4.2 states "Soil samples were held at the analytical laboratory pending review of field XRF data by the Project Team who then selected the samples for analysis." According to the Appendix A Summary of XRF Field Results Pistol Range, sample PR-SS04 with XRF values of 30, 33, and 21 and was chosen for laboratory analysis. However, sample PR-SS38 with XRF values of 128, 104, and 93 was not chosen. Please clarify this discrepancy.