

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 15, 2004

Commanding Officer
Naval Air Station Corpus Christi
Attn: Ms. D. Byerly
Code 186
11001 D Street
Corpus Christi, Texas 78419

CERTIFIED MAIL #2673
RETURN RECEIPT REQUESTED

Re: Comments to Groundwater Sampling Report, dated March 26, 2001
Industrial Wastewater Treatment Plant (SWMUs 334-348)
U.S. Department of the Navy, Naval Air Station, Corpus Christi, Texas (NASCC)
TCEQ SWR No. 30479
TCEQ Hazardous Waste Permit No. HW-50038
EPA I.D. No. TX7170022787

Dear Ms. Byerly:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittal. The submittal was received by the TCEQ on December 19, 2003. Based on our review, the TCEQ cannot approve the Groundwater Sampling Report at this time. A list of the comments is enclosed. Please submit a revised report which addresses the enclosed comments.

An original and one copy of the revised report must be submitted to the TCEQ at the letterhead address using mail code number MC-127. An additional copy should be submitted to the TCEQ Region 14 Office in Corpus Christi. Your response must be received on or before February 1, 2005. The facility name, location and identification numbers in the TCEQ reference line above should be included in your response.

Ms. D. Byerly
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10/15/04

Please call me at (512) 239-6791 if you need additional information or wish to discuss these comments or the due date. Thank you for your cooperation in this matter.

Sincerely,

Kenneth E. Davis

Kenneth E. Davis, P.G., Project Manager
Team III, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

cc: Commanding Officer, Attn: Ms. Helen Lockard, SOUTHNAVFACENGCOM, Code
ES33, P.O. Box 190010, North Charleston, SC 29419-9010
Waste Program Manager, TCEQ Region 14 Office, Corpus Christi

Enclosure: Comments

TCEQ letter dated 10/15/04
ENCLOSURE
TCEQ SWR No. 30479

COMMENTS

1. To document compliance with the Texas Professional Geoscience Act, the Remediation Division will not review reports and documents received on or after October 1, 2004 that contain unsealed geoscience services or work. Reports and documents with unsealed geoscience services or work will be returned to the submitting party. For further information, see the Texas Board of Professional Geoscientists website (<http://www.tbpg.state.tx.us>). Additional information is also available at <http://www.tnrcc.state.tx.us/permitting/remed/techsupp/PGReports.pdf> on the TCEQ web site. Please direct all questions regarding what constitutes geoscience to the Board (512/936-4400).
2. The TCEQ requests that the cover of all written correspondence reference the facility name, location and identification numbers as contained in the TCEQ reference line of this letter. This information is necessary for the TCEQ to properly track documents related to the facility.
3. Groundwater Sampling Report: The TCEQ requests that the Navy identify the source of the contaminants observed in the upgradient monitor well (MW-1).
4. Groundwater Sampling Report: The report did not contain drillers' reports and well construction diagrams for the monitor wells which were sampled. The TCEQ requests that drillers' reports and well construction diagrams be provided in future reports.
5. Groundwater Sampling Report, pg. iii: The report indicates that it is intended to serve as a closure report for Solid Waste Management Units (SWMUs) 337 (batch phenol destruction unit) and 338 (batch cyanide destruction unit). A Waste Management Unit (WMU) closure report must contain significantly more information than was provided in Groundwater Sampling Report. Information which should be included in a closure report includes:
 - Description of the WMU, including Notice of Registration (NOR) No., construction, condition, operational history, waste(s) managed, waste characterization results (process knowledge or analytical results), and any waste spill(s) and cleanup response(s),
 - Reason for the WMU closure (for example, facility closing, TCEQ inspection),
 - A map of the facility showing the WMU location,

- Description of how the WMU was closed and demonstrated to not have released to the environment, such as:
 - certification by a registered professional engineer of secondary containment and tank integrity,
 - soil sample results and, if necessary, groundwater sample results,
 - completed facility inspection logs and maintenance reports,
 - Photographs with descriptions of the WMU before, during, and following closure,
 - Description of the WMU and waste dispositions related to the closure, including copies of waste manifests, if applicable.
6. Groundwater Sampling Report, pg. 4: The paragraph describing the April 26-27, 1999 groundwater sampling event contains a statement that, "No contaminants were detected above site specific PCLs." The TCEQ is unaware of any site-specific Protective Concentration Levels (PCLs) that would apply to this closure. Please ensure that the basis of the regulatory values which sample concentrations are being compared to is provided in future reports.
7. Groundwater Sampling Report, pg. 4: The report references previously conducted sampling events and provides groundwater sample Chemical of Concern (COC) concentration data from those sampling events; however, the report does not contain copies of the laboratory reports from the sample analyses. Please ensure that laboratory reports are provided for all analytical data contained in future reports.
8. Groundwater Sampling Report, Figure 1 - Site Map: The map does not indicate where the site is located on Naval Air Station Corpus Christi (NASCC). Please ensure that all future reports enable the reviewer to determine where on NASCC the subject site is located.
9. Groundwater Sampling Report, page 13, Table 2: The referenced table indicates that the values contained in the table are in parts per billion ($\mu\text{g/L}$). Based on the laboratory data sheets contained in the report, the concentration unit used in the table is parts per million (mg/L). Please ensure that the correct concentration unit is used in all tables of future reports.
10. Groundwater Sampling Report, Appendix C - References: The report references Report of the Micropurge Sampling and Analysis of SWMUs 334-348, 357, 9 and 310-315 located at Corpus Christi Naval Air Station, dated March, 2000, by Miller Environmental Services, Inc. of Corpus Christi. To date, this report has not been submitted to the TCEQ.

TCEQ letter dated 10/15/04
ENCLOSURE
TCEQ SWR No. 30479

If the report is referenced in the future, it should be included as an appendix of the report in which it is referenced.