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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 1, 2005

Ms. Helen Lockard, E.I.T.  
Remediation Project Manager  
SOUTHNAVFACENGCOM  
Code ES33  
P.O. Box 190010  
N. Charleston, SC 29419-9010

**CERTIFIED MAIL # 8678**  
**RETURN RECEIPT REQUESTED**

Re: Comments to Draft Final Preliminary Assessment, dated November, 2004  
Former Gunnery Department Training Complex [Small Arms Range, Fixed Target Range,  
Air Blast & Synchronized Gun (AB/SG) Range, North Trap Range, South Trap Range,  
Skeet Range]  
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. Lockard:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittal. The submittal concludes that Munitions and Explosives of Concern (MEC) are not believed to be present at the Former Gunnery Department Training Complex, and recommends a Site Investigation (SI) be performed for each former range in the Complex to confirm the presence or absence of Munitions Constituents (MC). Based on our review, the TCEQ concurs with the conclusions/recommendations; however, comments are provided below concerning information requested for future reports. No written response is required to this TCEQ letter, other than the submittal of the requested SI or Affected Property Assessment Report (APAR), as applicable (see Comment No. 1 below).

1. If Chemicals of Concern (COCs) are determined to be present at the Former Gunnery Department Training Complex at concentrations which exceed Texas Risk Reduction Program (TRRP) Residential Assessment Levels (RALs), the TCEQ requests that an affected property assessment be conducted in accordance with the TRRP rule, and that an APAR be submitted using the APAR form. TRRP guidance and forms may be downloaded from the TCEQ web site at <http://home.tnrcc.state.tx.us/permitting/remed/techsupp/guidance.htm>.

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2. Draft Final Preliminary Assessment, pgs. 5-2 to 5-3 (Small Arms Range): The report states that, "*Prior to demolition, the eastern end of the target berm had been removed and used for fill material at other locations within the installation. There are no records indicating the dirt from the target butt was sampled, sieved, washed or otherwise remediated prior to use as fill material.*" The TCEQ requests that the locations where the target berm materials were placed be determined and sampled for the presence of MC, as a part of the Site Investigation for the Former Gunnery Department Training Complex.

An original and one copy of the Site Investigation report, or if COCs are detected at concentrations which exceed RALs, the APAR, 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. **The Site Investigation or APAR must be received on or before July 1, 2005.** The facility name, location and identification numbers in the TCEQ reference line above should be included in your response.

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, Naval Air Station Corpus Christi, Attn: Ms. D. Byerly, Code 186  
11001 D Street, Corpus Christi, Texas 78419  
Mr. Bob Sturdivant, United States Environmental Protection Agency, Mail Code 6PD-N,  
1445 Ross Ave., Ste. 1200, Dallas, TX 75202-2733  
Waste Program Manager, TCEQ Region 14 Office, Corpus Christi