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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 4, 2005

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

CERTIFIED MAIL # 8647
RETURN RECEIPT REQUESTED

Re: Comments to Revised Draft Final Preliminary Assessment, dated October, 2004
Naval Auxiliary Landing Field (NALF) Waldron
Intersection of Waldron Road and Yorktown Boulevard, Corpus Christi, Texas
TCEQ Facility ID No. T1984

Dear Ms. Lockard:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittal, which submitted under a cover letter dated October 18, 2004. We regretfully must inform you that the TCEQ cannot concur with the conclusions of the Revised Draft Final Preliminary Assessment. A list of the comments from the review follows.

1. Revised Draft Final Preliminary Assessment, pg. ES-2: The report indicates that the Skeet Range was demolished sometime between June, 1947 and July, 1961, that the area is not used for military purposes, and that future use is not expected to change. Based on this information, the Skeet Range is considered to be "closed," rather than "inactive." Because the range is closed, any Munitions Constituents (MC) contamination present in the soils is considered to be waste, requiring assessment and closure in accordance with the Texas Risk Reduction Program (TRRP) rule. No written response is requested to this comment.
2. Revised Draft Final Preliminary Assessment, pg. ES-2: The report indicates that based on historical operations at the site, it is possible for MC contamination [lead, antimony, copper, nickel, zinc, black powder] and Polycyclic Aromatic Hydrocarbons (PAHs) (from clay targets) to exist in surface soils at the Skeet Range. The cover letter submitted with Revised Draft Final Preliminary Assessment recommends that no further action be taken regarding the MC contamination and PAHs. The TCEQ does not concur with this

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recommendation because the precise nature and extent of the possible contamination is unknown, due to the fact that no samples of environmental media were collected and analyzed from the former Skeet Range. The TCEQ requests that an affected property assessment be conducted in accordance with the TRRP rule, and that an Affected Property Assessment Report (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>.

An original and one copy of the Affected Property Assessment Report (APAR) requested in Comment No. 2 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 APAR must be received on or before July 1, 2005.** The facility name, location and identification number 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