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LETTER AND COMMENTS FROM TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
REGARDING CONDITIONAL APPROVAL OF DRAFT FINAL SITE INSPECTION REPORTS
AT GUNNERY TRAINING COMPLEX AND UXO 2 NAS CORPUS CHRISTI TX
09/22/2010
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Bryan W. Shaw, Ph.D., *Chairman*
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 22, 2010

Ms. Leanna Woods Poon
leanna.woodspoon@navy.mil
NAVFAC SE
Environmental Restoration
Building 903, P.O. Box 30
Jacksonville, FL 32212

Re: Conditional Approval to the Draft Final Site Inspection Reports for the Naval Air Station Corpus Christi Gunnery Training Complex and Naval Auxiliary Landing Waldron Skeet Range
U.S. Department of the Navy, Naval Air Station Corpus Christi
Corpus Christi, Texas
TCEQ SWR No. 30479, TCEQ Facility ID No. T1984

Dear Ms. Poon:

The Texas Commission on Environmental Quality (TCEQ) has received the Draft Final Site Inspection Reports for the Naval Air Station Corpus Christi Gunnery Training Complex and Naval Auxiliary Landing Waldron Skeet Range. The Naval Air Station Corpus Christi Gunnery Training Complex and Naval Auxiliary Landing Waldron Skeet Range are required to proceed to a remedial investigation. The TCEQ accepts the site inspections provided the Navy addresses the attached comments in future submittals. Please see the attached comments that will be required to be addressed in the remedial investigation.

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,

A handwritten signature in black ink, appearing to read "Chris Siegel".

Chris Siegel, Project Manager
VCP-CA Section, VCP Team 1
Remediation Division

CS/jdm

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

Attachment

**Comments for the Waldron Skeet Range
(TCEQ Facility ID No. T1984)**

1. The Tier 2 calculation assumes a depth to groundwater. Also, the calculation assumes the thickness of the contamination stops at the depth of the lowest contaminated sample. Please assume the depth of the deepest soil sample is the top of the groundwater bearing unit or determine the top of the groundwater bearing unit. Please assume the affected soil above the Tier 1 soil-to-groundwater protective concentration level (PCL) ends at the first soil sample that has concentrations of lead detected below the Tier 1 soil-to-groundwater PCL or background. Recalculate the Tier 2 and determine if there is affected property based on concentrations of lead in soils.
2. Please specify which sample was analyzed for pH. Also, the Kd for lead is dependent on soil type. Please specify the soil type used for the Kd along with data (most likely field notes) to support this soil type.
3. Laboratory data and a data usability summary were not submitted with this report. Please submit this data with the data from the remedial investigation.
4. Please be aware that the assessment level for all chemicals of concern (COCs) in surface soils is the lower of the total soil combined and the soil-to-groundwater PCLs or background unless a justification that groundwater is protected in accordance with 350.75(i)(7)(C). A groundwater sample is required if the Navy attempts to utilize this justification. While the conceptual site model assumes COCs are not leaching to groundwater, site specific data from the site is needed to confirm this assumption.

**Comments for the Gunnery Complex
(SWR No. 30479)**

5. Tier 2 calculations need to be performed for each area using site specific data from each area. Please revise calculations as needed and determine if additional COCs are required to be addressed in the remedial investigation.
6. The Tier 2 calculation assumes the thickness of the contamination stops at the depth of the lowest contaminated sample. Please assume the affected soil above the Tier 1 soil-to-groundwater PCL ends at the first soil sample that has concentrations detected below the Tier 1 soil-to-groundwater PCL or background. Vertical delineation to the Tier 1 soil-to-groundwater PCL was not completed for all areas and thus the L1 must be assumed to equal L2 unless additional data is gathered to determine affected thickness. Please utilize the Tier 1 PCL or revise the Tier 2 PCL as necessary. Please specify the sample location if a site specific L1 is determined.
7. Please define the source of the L2 value.

Ms. Leanna Woods Poon

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8. Please specify which sample was analyzed for pH. Also, the Kd for lead is dependent on soil type. Please specify the soil type used for the Kd along with data (most likely field notes) to support this soil type.
9. Vertical delineation to background for all COCs at each area was not obtained. Please assess groundwater or delineate to background for each COC in each area. While the conceptual site model assumes COCs are not leaching to groundwater, site specific data from the site is needed to confirm this assumption.
10. The report specifies that asphalt roads were present on the North and South Trap areas at the locations of the polyaromatic hydrocarbon exceedances. Please include aerial photos in the remedial investigation report to document these roads with the locations of these exceedances.
11. The report specifies that the metals release at the South Trap may be the result of recreational activities. The chemicals found in soil were the result of activities located at the site regardless of whether the release was the result from activities associated with the South Trap. Please address this in the remedial investigation for the gunnery complex or address this contamination in a separate remedial investigation.
12. Laboratory data and a data usability summary were not submitted with this report. Please submit this data with the data from the remedial investigation.