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NAS FORT WORTH
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LETTER REGARDING REGULATORY COMMENTS ON RCRA FACILITY INVESTIGATION
WORK PLAN FOR SOLID WASTE MANAGEMENT UNITS 16, 22, 23, 24, 32, 35, 36, 61 AND
68 NAS FORT WORTH TX
2/6/1992
TEXAS WATER COMMISSION



**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 100

00004

John Hall, Chairman
 Pam Reed, Commissioner
 Peggy Garner, Commissioner



File: 21F
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TEXAS WATER COMMISSION

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

February 6, 1992

Colonel David F. Fink, P.E., USAF
 Base Civil Engineer
 Headquarters, 7th Support Group (SAC)
 Carswell Air Force Base, Texas 76127-5000

Re: RCRA Facility Investigation (RFI) Workplan
 Hazardous Waste Permit No. HW-50289
 Solid Waste Registration No. 65004

Dear Colonel Fink:

The Texas Water Commission has reviewed the RFI Workplan dated September 9, 1991 which discusses the investigative work to be performed on the following industrial solid waste management units located at Carswell Air Force Base: SWMU's No. 16, 22, 23, 24, 32, 35, 36, 61 and 68. FEB 10 1992

The evaluation of the RFI Workplan indicates that the proposed activities do not completely fulfill the requirements of Provision VIII. (the RFI portion of hazardous waste permit No. HW-50289). This provision requires submitting a workplan which will determine if a release to the environment of hazardous waste or hazardous constituents has occurred at the subject units. Therefore we request that within sixty days of the date of this letter you resubmit an amended original RFI Workplan and two identical copies, and incorporate the following items which were insufficiently addressed in the original submittal:

- 1) For units 16, 32, 35, 36 and 61 you imply that the investigation and remediation will be concurrent. If our interpretation of your intention is correct we require that your workplan for these units specify and describe this approach. In addition, we suggest that you submit the workplan for units which will be simultaneously investigated/remediated apart from units 22, 23 and 24 which will be investigated differently.
- 2) For SWMU No. 35, you neglected to provide a sketch and accompanying narrative of how the unit has been improved (see workplan p.17).

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- 3) For SWMU No. 68, we require that your workplan specify both exploration and interim remediation measures.

The following example may apply:

- a) Additional exploration is planned to define the "area of influence" of the POL tank farm. Then describe your approach.
- b) An interceptor trench (or equivalent) is proposed as an interim measure to withdraw contaminated groundwater from the POL. Attach a sketch with dimensions.
- 4) Units 22, 23 and 24 may be more appropriately addressed on an "emergency" basis. Because we already know that a groundwater contamination plume exists, and is not stationary, we require that you develop a plan for containment and removal of the plume. Moreover, we require that you incorporate elements of the RFI which will precisely pinpoint the aerial extent of contamination so that your containment and removal plan may be subsequently adjusted to accommodate the entire plume.

As applicable to Units 22, 23 and 24, we have reviewed the document entitled Installation Restoration Program Stage 2 which was authored by Radian Corporation.

The following comments reflect our suggestions for developing the containment and removal plan which may be pursued on an emergency basis:

- a) Get preliminary approval from POTW that says they are willing to accept the withdrawn groundwater.
- b) Propose a scheme to withdraw separately the following two phases:
- i) bottom layer of dense TCE
 - ii) upper layer of TCE - Contaminated groundwater
- c) To preserve the existing separation of phases the use of interceptor trenches, french drains, and excavated surface impoundments may be effective.

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- d) Consider surface apparatus (e.g. cyclone separators) to further separate dense phase TCE from other constituents; consolidated TCE may be drummed for disposal or recycle activity.
- e) Write us a request letter authorizing you to install the plume/groundwater withdrawal apparatus as an emergency measure.
- f) Depending on how well the withdrawal effort works you may or may not be required to cap and slurry wall SWMUs 22, 23 and 24.

5) At this time we have not received your RFI Workplan for Units 21 (waste oil tank) and 28 (landfill no. 1). Therefore, we require that you provide us with the appropriate workplan without further delay.

Please note that you will not receive a separate notice of deficiency letter covering your RFI workplan submittal from the U.S.E.P.A. Rather, this and subsequent reviews of your RFI Workplan will be provided exclusively by the TWC.

Further evaluation of your RFI Workplans will continue upon receipt of your response to this request. If you have questions or comments, please contact Alan P. Church, P.E. at AC512/463-8020.

Sincerely,



Charles E. Mauk, Supervisor
Permit Team IV
Permits Section
Industrial and Hazardous Waste Division

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cc: TWC District 4 Office - Duncanville
Bill Honker, EPA Region VI - Dallas

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