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NAS FORT WORTH  
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LETTER REGARDING REGULATORY REVIEW AND CONDITIONAL APPROVAL OF  
PRELIMINARY ASSESSMENT SITE INVESTIGATION WORK PLAN FOR SOLID WASTE  
MANAGEMENT UNIT 62 NAS FORT WORTH TX

9/22/1993

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

160000



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

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 166

John Hall, *Chairman*  
Pam Reed, *Commissioner*  
Peggy Garner, *Commissioner*  
Anthony Grigsby, *Executive Director*



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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

September 22, 1993

Mr. Ohlen Long  
Site Manager  
Headquarters, Air Force Base Disposal Agency  
Location H, Bldg 1215  
Carswell Air Force Base, Texas 76127-5000

RE: Carswell Air Force Base, Solid Waste Registration No. 65004  
EPA ID NO. TX0571924042, Review of Preliminary Assessment/Site  
Investigation (PA/SI) Workplan for Solid Waste Management Unit  
(SWMU) 62.

### Approval with Modifications

Dear Mr. Long:

The Texas Natural Resource Conservation Commission (TNRCC), formerly the Texas Water Commission (TWC), Corrective Action Staff, has completed review of the Preliminary Assessment/Site Investigation (PA/SI) Workplan for SWMU 62 also known as Landfill No. 6. The workplan was submitted to the TWC by Carswell AFB in correspondence dated June 1993.

Carswell AFB submitted the Workplan to comply with part of Provision VIII of RCRA Permit Number HW-50289 that was issued to Carswell AFB by the Texas Water Commission (TWC) on February 7, 1991.

- 1) The work plans title as well as much of the language characterizes the site in CERCLA terminology. The referenced SWMU is regulated under RCRA/HSWA authority and is required to follow the RCRA corrective action process. The work plan should be modified in order to use RCRA/HSWA terminologies. The work plan should also state that it was developed to meet the permit requirements.

Mr. Long  
Draft Work Plan  
SWMU 62  
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- 2) Figures 3 and 4 would be more usefull if they indicated the location of SWMU 62.
- 3) Figure 5A, Typical Geologic Cross Section, includes specific data points on the cross section that are not shown on any of the base maps.
- 4) Figure 7, Site Plan, shows two buildings that are both labelled 1050.
- 5) The second paragraph on page 30, Ground-water Contamination, states that "the relative depths to ground water recorded in previously drilled borings indicates a flow direction to the north east". There is not enough data to define the flow direction since relative elevations of the borings were not included on the boring logs.
- 6) The Recommendations section of the Work Plan indicates that at least three soil samples will be collected from each boring. Part VIII A.2.b.(1) of the permit requires that "samples submitted for chemical analysis must be collected every 5 feet from the surface to the bottom of the boring and be analyzed...". Carswell AFB should adjust the sampling frequency of the work plan to comply with permit requirements. The soil sample retrieved from immediately above the saturated interval as proposed in the work plan may substitute for the nearest 5 foot sample.
- 7) Part VIII. A. 2. b. (2) of the permit requires the upper 20 feet of the upper flow zone of the uppermost aquifer must be sampled by wells. Page 32 of the work plan, Recommendations, indicates that wells will be screened a minimum of 5 feet into the ground water. Carswell AFB should install all of the wells as required by the Permit. If the aquifer is 20 feet thick then please install a nested well monitor system so that no more than 15 feet of the aquifer is monitored by any one well screen.
- 8) Section 9.0 of the work plan, Recommendations, requires collection of a complete round of ground water samples after all wells have been installed. Section VIII A.2.b.(4) of the permit requires that a statistical method be submitted that will be used to determine if a statistically significant increase over background has occurred for soil or water samples. Section (4) of the permit also calls for 3 sampling events spaced at two month intervals. The Work Plan does not meet the permit sampling requirements.

Mr. Long  
Draft Work Plan  
SWMU 62  
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- 9) Permit provision VIII.A.2.b.(4) also requires testing for all Appendix IX constituents, unless a shorter list can be justified. Tables 3-3 through 3-5 indicate the parameters that are proposed for analysis for various samples. The work plan should include specific justification for abbreviating the list of contaminants for which analysis is performed.
- 10) This Approval with Modifications as well as permit provision VIII. C. requires notification of the TNRCC Region 4 office in Duncanville at least 10 days prior to any sampling activity in order to afford Region personnel the opportunity to split samples.

This letter constitutes approval of the workplan for SWMU 62 on the condition that the above mentioned concerns are addressed to the satisfaction of the TNRCC and that those concerns are incorporated into the RFI field activities and report; and directs you to begin the RFI/Corrective Action without delay.

If you have any questions or require further information concerning this matter please contact Mr. Cecil Irby of my staff at (512) 908-2365.

Sincerely,

  
Paul Lewis, Manager  
Corrective Action Section  
Industrial and Hazardous Waste Division

PL:ci/ci

cc: David Neleigh, EPA Region 6  
Don C. Eubank, TNRCC District 4  
Charles Mauk, TNRCC Permits  
Tennie Larson, I & HW, CA 150

John Hall, *Chairman*  
Pam Reed, *Commissioner*  
Peggy Garner, *Commissioner*  
Anthony Grigsby, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

September 22, 1993

Mr. Ohlen Long  
Site Manager  
Headquarters, Air Force Base Disposal Agency  
Location H, Bldg 1215  
Carswell Air Force Base, Texas 76127-5000

RE: Carswell Air Force Base, Solid Waste Registration No. 65004  
EPA ID NO. TX0571924042, Review of Preliminary Assessment/Site  
Investigation (PA/SI) for the WASTE OIL DUMP.

### **NFA Approval with Modifications**

Dear Mr. Long:

The Texas Natural Resource Conservation Commission (TNRCC), formerly the Texas Water Commission (TWC), Corrective Action Staff, has completed review of the Preliminary Assessment/Site Investigation (PA/SI) Report for Site DP17 also known as the Waste Oil Dump. The report, dated May 1993, was submitted to the TWC by Carswell AFB in correspondence dated June 1993.

The report was submitted to the Texas Water Commission (TWC) for approval as required by part V.I. of the Resource Conservation and Recovery Act (RCRA) Permit #HW-50289. The RCRA Permit was issued to Carswell AFB by the Texas Water Commission (TWC) on February 7, 1991. The report appears to be consistent with the requirements of Section V.I. of the Permit that requires notification of a release from any solid waste management unit (SWMU) regardless of when the release occurred and whether or not the SWMU had been previously identified.

Since the RCRA permit did not recognize the Waste Oil Dump as a SWMU the study was performed to satisfy the Department of Defense, Installation Restoration Program (IRP) requirements. This letter constitutes concurrence by the Executive Director with the conclusion of the report that states that there is no evidence that the ground water contamination under the unit is caused by past or present activities at the site.

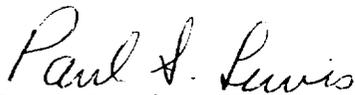
Mr. Long  
PA/SI-NFA  
Waste Oil Dump  
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No Further Action for the soils at the Waste Oil Dump are required at this time. The ground water at this site will be included in the investigation of the adjacent Air Field ground water. If information becomes available that indicates contamination remains at the site, TNRCC will require further investigation at that time.

This letter constitutes approval of the decision for No Further Action for soils at the Waste Oil Dump subject to the above mentioned requirements. Since this unit was never recognized by any RCRA process as a SWMU no public notice is required.

If you have any questions or require further information concerning this matter please contact Mr. Cecil Irby of my staff at (512) 908-2365.

Sincerely,



Paul Lewis, Manager  
Corrective Action Section  
Industrial and Hazardous Waste Division

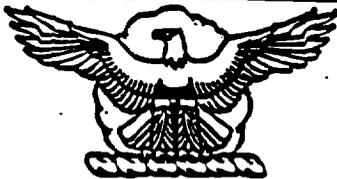
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cc: David Neleigh, EPA Region 6  
Don C. Eubank, TNRCC Region 4  
Charles Mauk, TNRCC Permits  
Tennie Larson, TNRCC Corrective Action (CA210)

(817) 782-6282

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DISPOSAL AGENCY**



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AIR FORCE BASE DISPOSAL AGENCY**

**(HQ AFBDA/SWH)**

**The Civil Engineering Building**

**Carswell AFB TX 76127-5000**

**SUBJECT:** CANDILL 6

**Total pages including cover** 25

**TO:** Debbie

**DATE:** 7 Oct

**Phone:** \_\_\_\_\_

**FAX Number:** 3342991

**FROM:** **HQ AFBDA/SWH**

F. Mey  
**Phone: DSN 739-6282/ Commercial (817) 782-6282**

**FAX Number: DSN 739-6257/ Commercial (817) 782-6257**

**NOTE:**

(817) 782-6282

Landfill  
616600

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AIR FORCE BASE DISPOSAL AGENCY  
(HQ AFBDA/SWH)  
The Civil Engineering Building  
Carswell AFB TX 76127-6000

SUBJECT: LANDFILL 6

Total pages including cover 25

TO: Debbie

DATE: 2 Oct

Phone: \_\_\_\_\_  
FAX Number: 334-2991

FROM: HQ AFBDA/SWH  
F. H. H.

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