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MEMORANDUM REGARDING EMERGENCY BRAC CLEANUP TEAM MEETING HELD 10
AUGUST 1994 NAS FORT WORTH TX
8/11/1994
CARSWELL AIR FORCE BASE

167000



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 167

MEMORANDUM FOR RECORD

TO: HQ AFBCA

SUBJECT: Emergency BCT meeting

1. On 10 August, 1330 hours, a special BRAC Cleanup Team (BCT) meeting was held in the Carswell AFB Large Conference Room (Building 1215). In attendance were representatives from AFBCA/OL-H, AFCEE, Texas Natural Resource Conservation Commission (TNRCC), and EPA Region VI. Also in attendance were technical support representatives from Booz, Allen, and Hamilton, as well as Engineering Science. Mr. Chris Hobbins of the AFCEE was included in the meeting by phone.

2. The meeting began with a presentation by Mr. Doug Downey from Engineering Science of Denver, Colorado. Mr. Downey gave a slide presentation on the Risk Based Approach to Remediation of the POL Tank Farm Site. After the presentation, the regulators had several questions concerning the concept, but seemed quite receptive to the approach. Mr. Sam Taffinder then asked several questions to the regulators in regard to requirements to site closure once the project had been completed using this approach. It was decided by all that this method was acceptable.

3. The next item on the agenda was the Interim Remedial Action on the Base Service Station. In a preliminary meeting earlier that morning with Mr. Dave Bragg, Booz, Allen, Hamilton, Mr. Joe Feaster, AFCEE, Mr. Bobby Hernandez, AFBCA, and myself, it was decided that we would propose to install a soil bioventing system in combination with a groundwater pump and treat system. This action was acceptable to the regulators, because it addressed the requirements set forth by the Petroleum Storage Tank Division of the TNRCC on site remediation (Reference 1 July 1994 letter from TNRCC, Petroleum Storage Tank Division). The only problem encountered with the remediation plan was that of the regulators being very noncommittal to what was proposed. Both Mr. Irby of the TNRCC, and Mr. Baumgarten of EPA said that they could make no decisions without going through the proper protocol. Mr. Dave Bragg and myself argued that one of the main goals of "Fast Track Cleanup" was to empower the BCT members to make on-site decisions. However, both individuals remained non-committal and refused to give their final approval without first consulting others within their chain-of-command.

4. I then decided that since the meeting was no longer proceeding in a productive manner, that I would address the requirements set forth in the letter from the TNRCC, notify the PST division that our proposed plan should satisfy each requirement, and proceed with the remedial action on the site. It was agreed by all that this would be the most prudent course of action at this time. It is important to note that the Federal Facilities Coordinator from the PST Division of the TNRCC, Ms. Liz Scaggs, was invited to the meeting but did not attend.

5. The meeting adjourned at approximately 1630 hours. The AFCEE representatives will be in contact with us in regard to the timelines for installation of the remedial system.



FRANK G. GREY JR.
Chief Environmental Engineer

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

July 1, 1994

CERTIFIED MAIL

Frank G. Grey, Jr., P.E.
Chief Environmental Engineer
Carswell Air Force Base
AFBCA/OL-H
Bldg 1215 S. Warehouse Road
Carswell AFB, Texas 76127

Re: Comprehensive Site Assessment, Base Service Station,
Building 1518, Carswell Air Force Base (AFB)
(Tarrant County), Texas
(LPST ID No. 104524)

Dear Mr. Grey:

We have completed our review of the June 1994 Comprehensive Site Assessment Report prepared by the U.S. Army Corps of Engineers, Fort Worth District. After careful review of all the available information provided, we conclude the following:

1. There should be at least one uncontaminated upgradient monitor well at this site. Therefore, you are requested to install an additional well in an appropriate location to fully define the extent of groundwater contamination.
2. Initiate a groundwater monitoring program using the guidelines in the enclosed pamphlet titled *Groundwater Monitoring and Reporting*. Groundwater monitoring activities are necessary at LPST sites to document any significant changes that may occur in the subsurface conditions. The first observation report should be submitted to this Office no later than ninety (90) days from the date of this letter.

We also recommend that on the next sampling event, monitor wells MW-7, MW-8, and MW-11 should be sampled for TCE. The verification of presence or absence of TCE underlying this site needs to be performed.

3. In accordance with 30 TAC, Section 334.79, if any evidence exists indicating the presence of free product accumulation in any monitor wells, immediate removal measures must be implemented. Daily observations should be made and appropriate action pursued to ensure that all free product is continuously removed.

Mr. Frank G. Grey, Jr., P.E.
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Enclosed is the standardized report form *Monthly Product Recovery Report (TNRCC--0025)*. This should be submitted to the TNRCC on a monthly basis only when phase-separated product is present (excluding product sheens of less than 0.01 feet).

4. Perform a risk assessment under TNRCC LPST guidelines to determine both soil and groundwater cleanup goals. The risk-based approach is the case-by-case consideration of the actual or reasonable potential for public and environmental exposure to the contaminants in the determination of the degree of site remediation. The risk assessment will generate contaminant cleanup levels for the source at Building 1518.
5. Reference page I-3: 31 TAC, Chapter 334, should be, 30 TAC, Chapter 334.
6. Please have the enclosed Existing LPST Case Questionnaire completed by a person knowledgeable in hydrogeology. This questionnaire will assist us in prioritizing your site. All indicated responses should be readily apparent.

Copies of all correspondence with this Office must be provided to our Region 4 Office in Duncanville to the attention of Tony Walker. Should you have any questions regarding this letter, please contact me at 512/239-2234. Your cooperation in this matter will be appreciated.

Sincerely,



Liz Scaggs
Federal Facilities Coordinator
Responsible Party Remediation Section
Petroleum Storage Tank Division

LAS/cma
104524.rev

cc: Tony Walker, TNRCC Region 4 Field Office, 214/298-6171
(1019 N. Duncanville Road, Duncanville, Texas 75116-2201)
Cecil Irby, TNRCC Federal Facilities Team

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