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NAS FORT WORTH
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LETTER REGARDING REGULATORY REVIEW AND CONDITIONAL APPROVAL BASED ON
COMMENTS FOR ENGINEERING EVALUATION COST ANALYSIS WORK PLAN TO
SUPPORT RISK BASED APPROACH TO REMEDIATION OF SITE ST14 NAS FORT WORTH
TX
8/29/1994
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 199

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



WOL 7. File: 17A39
A.F. 199
Farm 199
19901

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 29, 1994

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,
TNRCC Hazardous Waste Permit No. HW50289,
Solid Waste Registration No. 65004,
EPA ID NO. TX0571924042,
Review of Work Plan for an Engineering Evaluation/Cost
Analysis in Support of the Risk-Based Approach to Remediation
at Site ST14, dated June 1994.

Approval with Modifications

Dear Mr. Long:

The Texas Natural Resource Conservation Commission (TNRCC), formerly the Texas Water Commission (TWC), Corrective Action Staff has reviewed the referenced Work Plan and requests clarification on several points listed below. The Work Plan, dated June 1994, was received by the TNRCC on July 12, 1994, and was submitted by Carswell AFB in partial compliance with part VIII of permit number HW-50289.

The hazardous waste management permit requires that Carswell AFB perform a RCRA Facility Investigation (RFI) of the Solid Waste Management Unit (SWMU) 68, POL tank farm, site ST14. The original RFI work plan was reviewed and a Notice of Deficiencies letter was sent to Carswell by the TWC on December 23, 1992. The above referenced work plan for the Risk-Based Approach was developed for the purpose of completing the RFI investigation required by the permit, performing a base line risk assessment in accordance with 30 Texas Administrative Code (TAC) Subchapter S for Risk Reduction Standard 3, and including a Corrective Measures Study in tandem with the investigation part of the work.

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The following items should be changed, corrected or clarified in the final draft of the Work Plan and in the Report that is generated by the investigation/risk assessment.

1. Section 1.1 indicates that Risk Reduction Standard No. 3 will be achieved by implementing an appropriate remedial alternative. Please be aware that the proposed remedy under Risk Reduction Standard No. 3 requires approval by the TNRC prior to implementation.
2. The first paragraph in section 2.1 gives a physical description of site ST14B that includes two above ground fuel storage tanks that are schematically represented in Figure 2.1. No physical description of fueling equipment is included for site ST14A which is described only as the fuel loading area in the text. Please include the major pieces of fuel dispensing equipment located at site ST14A and also include that equipment on Figure 2.1.
3. The first paragraph in section 2.3.3 states that no chlorinated solvents were detected at site ST14 during the 1994 sampling event conducted by Law Engineering. The plan fails to indicate which analytical tests were performed during that sampling event. In addition, the plan does not indicate whether ground water and/or soils were tested for metals and TCE.
4. Section 3.1.7 states that on-base contaminated media will be considered possible exposure points only for those base personnel who currently have access to site ST14. A risk based scenario for acute exposure due to construction type of work at site ST14 should also be included in the baseline risk assessment.
5. Table 3.2 includes a group of soil and ground water "Evergreen" levels that come from the 56 Federal Register 20(1/30/91). In order to comply with 30 TAC Subchapter S the levels used for Table 3.2 should be determined by Risk Reduction Standard No. 2 (§ 335.556-335.559).
6. Table 4.1 includes the analytical methodologies that will be used in the investigation. The table should include the methodology for testing TCE in ground water. At least one ground water sample should be collected from four different wells and tested for the presence of TCE due to the potential migration of the TCE plume (or plumes) already discovered on the base.

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7. Section 4.3.1 states that "Based on oxygen uptake rates, potential hydrocarbon degradation was estimated at 950 to 9,900 mg of fuel per kg of soil per year." Please explain calculations and the scientific literature used to arrive at this figure.
8. Section 4.3.2 states that "Table 4.3 summarizes the quantities of free product that have been recovered on a weekly basis for the last 10 months". Table 4.3 only includes free product thickness measurements. Please include the amount of free product recovered on this table.
9. Section 5.2.3.2 indicates that sources of toxicity information will include the Integrated Risk Information Systems (IRIS) and the Health Effects Assessment Summary Tables (HEAST). Please be aware that 30 TAC Subchapter S identifies a particular order of precedence for toxicity information, and that hierarchy is that IRIS data takes precedence over HEAST data.
10. Section 5.2.3.2.2 includes various exposure pathways for soil that will most likely be used to develop soil remediation goals. Dermal contact should also be included as one of the likely pathways included in the second paragraph of that section.
11. Section 5.2.3.2.3 quotes 55 Federal Register 8717 (3/8/90), "ground water that is not an actual or potential source of drinking water may not require remediation to a 10^{-4} to 10^{-6} [risk] level". For your information, since we know the shallow ground water at Carswell flows into the Trinity River and Lake Worth, it is unlikely that the TNRCC would approve ACL's that are less than the standard 10^{-4} to 10^{-6} .
12. The plan does not indicate what reports will be generated during the investigation, and what the anticipated date for submission of those reports will be to the TNRCC.
13. Carswell AFB must notify the TNRCC, Region 4 office at least 10 days prior to any field activities so that the agency may have the opportunity to observe sample collection and split samples.

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This letter constitutes approval of the RFI, Risk Reduction and CMS activities described in this work plan, subject to the comments and requirements listed above. Please respond to these comments in writing within 90 days from the date of this letter. If you have any questions or require further information concerning this matter please contact Mr. Cecil Irby of my staff at (512) 239-2365.

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 Region 4
Wade Wheatley, TNRCC Permits
Tennie Larson, Corrective Action (CA300)

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