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NAS FORT WORTH  
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LETTER REGARDING U S EPA REGION VI REVIEW AND COMMENTS ON RCRA FACILITY  
INVESTIGATION WORK PLAN FOR SOLID WASTE MANAGEMENT UNIT 62 NAS FORT  
WORTH TX  
9/15/1994  
U S EPA REGION VI

File: 17G  
P.W.



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

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 496

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

SEP 15 1994

Mr. Frank Grey  
Department of the Air Force  
AFBCA/OL-H  
Building 1215 S. Warehouse Road  
Carswell AFB, TX 76127

Dear Mr. Grey:

The Environmental Protection Agency (EPA) has reviewed the RFI Workplan for SWMU No. 62. Comments based on EPA's review are enclosed for your review and comment.

The workplan does not contain an adequate Quality Assurance Project Plan. I am enclosing information that describes the elements that should be included as part of a Quality Assurance Project Plan. Also, the Worker Health and Safety Plan needs to be submitted prior to fieldwork beginning. There is also some question as to whether there are adequate soil borings planned to determine the nature and extent of any contamination associated with SWMU No. 62.

If you have any questions concerning these comments, please contact me at (214) 665-6749.

Sincerely,

*Gary A Baumgarten*  
Gary A. Baumgarten  
Project Manager

Enclosures

cc: Cecil Irby, TNRCC



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Carswell Air Force Base  
RFI Workplan SWMU No.62 - Landfill 6

General Comments:

Will a separate Quality Assurance Plan be submitted, or is the discussion in this work plan supposed to constitute the respective plan? The current workplan does not contain an adequate Quality Assurance Project Plan and one should be developed. The attached pages from EPA (EPA/540/G-89/004, OSWER Directive 9355.3-01, "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA) should be used in writing a Quality Assurance Project Plan.

What is the basis for selecting the Appendix IX list as the compounds to be analyzed for. EPA recommends that the organic target compound list (TCL) and the inorganic target analyte list (TAL) be used for conducting analysis of the soil and ground water samples.

No mention is made in the workplan concerning surface water sampling. If surface water samples are not going to be collected, please provide a justification.

Page 3, Paragraph 1: What records were used to determine that the landfill operated from about 1975 until 1978?

Page 5, Paragraph 1: It is stated that the surface of Landfill 6 has been used as a private vehicle parking compound. Is it still used as such, and if so, what will happen when the borings are drilled since they are going to be left open?

Page 13, Last Paragraph: Is the TCE investigation referenced in this paragraph the TCE investigation conducted as part of the hydrant fueling system investigation? If it is, the Phase I investigation occurred in June 1994 not 1993.

Page 14, Paragraph 1: Besides LF06-3 and LF06-4, LF-06-5 is within the borders of the former gravel pit based on Figure 7.

Page 16, Paragraph 2: What compounds are included in total halogens (TOX)?

Page 18, Paragraph 3: Whenever possible, the magnetometer survey should be extended beyond the currently defined limits of SWMU 62 (Hobby Shop Drive, Haile Drive, and Roaring Spring Road) since based on the current delineation of the TCE plume, there may be other sources possibly associated with SWMU 62, contributing to the TCE plume.

Page 19, Last Paragraph: Surface soil sampling (0 to 1 foot) should be done to confirm the hypothesis that the suspected contaminant sources at SWMU No. 62 are buried materials and will

not pose an airborne threat to normal foot traffic at the site or at the golf course and nearby residential areas. If there is surface soil contamination, airborne releases may be a factor in the RFI.

Page 20, Last Paragraph: Since SWMU 62 encompasses more than the original landfill, it seems inadequate to only have four soil borings. The goal of the investigation should not be only to investigate the landfill as a potential source. On-site areas which are not expected to be contaminated must also be sampled to verify the assumptions regarding concentrations.

Page 22, First Paragraph: What is meant by the statement "The necessary quality assurance (QA) and quality control (QC) samples will be the best possible duplication of the other samples. Sample preservation will be in accordance with the test methods used for parameter analysis"? The specific QA and QC procedures should be outlined in a site specific Quality Assurance Project Plan.

In addition, EPA recommends that the soil samples be analyzed for the organic target compound list (TCL) and inorganic target analyte list (TAL) rather than the Appendix IX chemicals. Target compounds may be selected only after adequate data exists to verify that the indicator compounds are reliable surrogates for all contaminants of concern.

Page 22, Last Paragraph: Ground water samples to define the extent of a release should only be collected from monitoring wells. The ground water samples that will be taken from the borings can be used to get a representation of constituents present but would not be suitable for defining the extent of contamination.

Page 23, Paragraph 2: Depending on the sampling results, investigation derived waste might be able to be placed back into the landfill.

Page 23 and Figure 11: How were the background sampling locations selected? Will the two upgradient wells be placed in a "clean" area? Have the background locations been reviewed to see if they would be drilled into part of the TCE plume?

If Landfill 6 is being considered the source of contamination in SWMU 62, it appears that MW-4 and MW-3 may not be adequate to determine if there are any releases from the landfill. Based on the location of these two wells and the ground water flow direction, it could be possible that a release from the landfill may not be identified. It is recommended that an additional monitoring well be placed in a line with MW-3 and MW-4 so that any possible release from the landfill would be identified.

Page 27, Paragraph 2: It should be decided before field work begins if the equipment is going to be dedicated to the individual wells, disposable or thoroughly decontaminated.

Page 28, First Paragraph: Will the ground water samples be filtered or unfiltered? Samples for metal analysis should generally not be filtered. If dissolved metals are expected to be a critical issue at the site, both filtered and unfiltered samples should be taken.

Page 27, 28: All ground water parameters which will be sampled for must be provided along with the appropriate SW-846 method to be used. The appropriate preservatives must be defined.

Page 29, Paragraph 2: What is the rationale for ground water sampling frequency? It would be more appropriate to have one year worth of data with samples collected on a quarterly basis.

Page 31, First Paragraph: The RFI report will also be provided to EPA.

Page 31, Last Paragraph: Is a human health or ecological risk assessment planned based on the information that will be collected as part of this investigation?

Page 35, Last Paragraph: The Safety and Health Plan should be submitted to the regulatory agencies for review before any field work is initiated.

**FINAL PAGE**

**ADMINISTRATIVE RECORD**

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