

N83447.AR.000190  
NAS FORT WORTH  
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON WORK PLAN FOR  
ENGINEERING EVALUATION COST ANALYSIS TO SUPPORT RISK BASED APPROACH  
FOR REMEDY AT SITE ST14 NAS FORT WORTH TX

12/2/1994

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

---

**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 242

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



40 ✓  
212  
File: 17A-39  
A.F.  
242

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

December 2, 1994

Mr. Douglas C. Downey, P.E.  
Project Manager  
Engineering-Science, Inc.  
1700 Broadway, Suite 900  
Denver, Co. 80290

RE: Fort Worth Naval Air Station (NAS), a.k.a. Carswell Air  
Force Base  
TNRCC Hazardous Waste Permit No. HW50289  
Solid Waste Registration No. 65004  
EPA ID NO. TX0571924042  
Work Plan for an Engineering Evaluation/Cost Analysis in  
Support of the Risk-Based Approach to Remediation at Site  
ST14

Dear Mr. Downey:

The Corrective Action Section staff of the Texas Natural Resource Conservation Commission (TNRCC) has reviewed your August 19, 1994 letter which proposes some resolutions and/or clarifications in response to our initial review of the above referenced work plan. Engineering Science specifically asks whether dermal exposure pathways calculations must be included in the risk based closure.

According to 30 Texas Administrative Code §335.563(d)(4), the Executive Director may direct persons to address reasonably expected exposure conditions. In order to determine if dermal exposure is a reasonable route of exposure, we request that Fort Worth NAS identify any populations that may become directly exposed to contaminated soils, surface waters, and ground water now or in the future. For instance, construction may expose workers to excavated soils during foundation or utility work. Dermal exposure may also occur if contaminated surface waters are used for recreation and/or bathing. If there are no identifiable populations subject to dermal exposure, then this route of exposure can be eliminated from further consideration.

We have two other minor comments concerning your response letter. Paragraph 3 states that the analytical results for dissolved

Mr. Douglas C. Downey, P.E.  
Forth Worth NAS  
Page 2 of 2

242 2

metals will be incorporated into the CMS/CMI. Please collect samples for both total (unfiltered) and dissolved (filtered) metals. A determination for which value is more appropriate to use in the CMS/CMI should be made in the subsequent report. Finally, for the sake of clarification, please refer to wells installed at plume boundaries as point of exposure wells, rather than point of compliance wells, unless the plume boundary happens to be at source unit boundary.

If you have any questions or need further assistance with this matter, please contact Mr. Geoffrey Meyer in Austin. Mr. Meyer's telephone number is (512) 239-2577.

Sincerely,



Paul Lewis, Manager  
Corrective Action Section

PL/gm

cc: ✓ Mr. Ohlen Long, Site Manager, Headquarters, Air Force Base  
Disposal Agency, Location H, Bldg 1215, Carswell Air  
Force Base, Texas 76127-5000  
David Neleigh, EPA Region 6  
Don C. Eubank, TNRCC District 4  
Charles Mauk, TNRCC Permits  
Tennie Larson, I & HW (CA170)

**FINAL PAGE**

**ADMINISTRATIVE RECORD**

**FINAL PAGE**

**FINAL PAGE**

**ADMINISTRATIVE RECORD**

**FINAL PAGE**