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LETTER REGARDING REGULATORY REVIEW AND ADDITIONAL REQUIREMENTS ON
DRAFT PLANNING DOCUMENTS FOR REMOVAL AND CLOSURE OF FUEL HYDRANT
SYSTEMS NAS FORT WORTH TX

12/20/1994

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 352

John Hali, *Chairman*
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HFS

File: 17A-58
A.F.

352

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

December 20, 1994

CERTIFIED MAIL

Mr. Frank Grey
Air Force Base Conversion Agency
AFBCA/OL-H
1 Depot Avenue, Bldg. 1215
NAS Ft. Worth Joint Reserve Base
Carswell Field, TX 76127-5000

Re: Removal/Closure of the Fuel Hydrant System
Naval Air Station Fort Worth
Draft Planning Documents
 Environmental Cleanup Plan
 Construction Quality Plan
 Sampling and Analysis Plan

Dear Mr. Grey:

We have completed our review of the Removal/Closure of the Fuel Hydrant System, Draft Planning Documents, Environmental Cleanup Plan, Construction Quality Plan and Sampling and Analysis Plan for the above-referenced facility dated November 1994. After careful review of all the information provided and in order to comply with Title 30, Texas Administrative Code (TAC), Section 334.54-334.81, please note the following:

1. Notification

The owner, operator, or designated agent shall first provide written notification, which must be received by the Texas Natural Resource Conservation Commission (TNRCC) at least 30 days in advance of any pending tank removal activity, using a TNRCC authorized form which must be sent to the TNRCC's central office in Austin or to the appropriate TNRCC Regional Office in accordance with 30 TAC, §334.6.

In addition to advance written notification of the TNRCC, the owner, operator, or designated agent must also contact the appropriate TNRCC Regional Office 24 to 72 hours in advance of initiating construction activities.

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2. Release Determination

Underground Storage Tank System

As part of the required procedures for the permanent removal of any underground storage tank system from service, the owner or operator shall determine whether or not any prior release of a stored regulated substance has occurred from the system. This determination must be capable of measuring for the presence of a release from any part of the UST system and, at a minimum, must include measurements for releases at locations where contamination is most likely to be present. One or more of the following methods may be used for conducting the release determination (30TAC 334.55):

- a. The continual operation (throughout the time that the stored regulated substances are removed from the UST system) of one or more of the external release monitoring and detection methods specified in 30TAC §334.50(d)(4) through (d)(8).
- b. The performance of a comprehensive site assessment. One or both of the following methods may be used for conducting the site assessment: (30TAC §334.55)
 - i. The collection and laboratory analysis of soil samples secured from unsaturated sections of the UST system excavation zone and surrounding soils, where such samples shall be analyzed for major constituents and/or indicator parameters of the stored regulated substance(s). In this case, the analytical samples will be for BTEX and TPH.

Benzene, toluene, ethylbenzene, and total xylenes (BTEX) in soil samples should be quantified using EPA Method 8020 (GC/PID) with EPA Method 5030 (Purge and Trap). Total Petroleum Hydrocarbons (TPH) samples should be quantified using EPA Method 418.1 (IR) or ASTM D3328-78, Method B (GC/FID, capillary column procedure). TPH samples should be prepared with EPA Method 3540 (Soxhlet extraction) or EPA Method 3550 (Sonication

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extraction) using fluorocarbon 113 as the extraction solvent.

- ii. Collection and analysis of groundwater samples secured from the UST system excavation zone and surrounding area, where such samples shall be analyzed for all major constituents or indicator parameters of the stored regulated substance(s).

Hydrant System

The TNRCC does not accept field screening as verification that there has/has not been a release either from an UST or hydrant system. Because of the extensive length of the system, we have modified our requirements and modified the sampling and analysis plan submitted.

- i. In addition to field screening for BTEX, the Commission will require field screening for Polycyclic Aromatic Hydrocarbons (PAH) at 100 foot intervals along the system. Additionally, ten percent of the BTEX and PAH samples, chosen randomly, should be submitted for laboratory verification.

Copies of all correspondence with this Office must be provided to our Region 4 Field Office in Duncanville. Should you have any questions, please contact me at 512/239-2200. Your cooperation in this matter has been appreciated.

Sincerely,



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

LAS/cma
hydrant.car

cc: Waste Manager, TNRCC Region 4 Field Office, 214/298-6171
(1019 N. Duncanville Road, Duncanville, Texas 75116-2201)
Geoff Meyer, I&HW Division, Corrective Action, Federal
Facilities

