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MINUTES FROM BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING FROM
24 JANUARY 1995 NAS FORT WORTH TX
1/24/1995
BRAC TEAM



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 245

**Air Force Base Conversion Agency
Base Realignment and Closure
Cleanup Team Meeting**

MINUTES OF 24 JANUARY 1995

REGULAR MONTHLY MEETING

A regular monthly meeting of the Air Force Base Conversion Agency (AFBCA) Base Realignment and Closure (BRAC) Cleanup Team (BCT), was held on Thursday, 24 January 1995. The meeting was called to order by Mr. Frank Grey, AFBCA Base Environmental Coordinator, at 1000 hours in the Civil Engineering Large Conference Room (Bldg 1215) at the Naval Air Station (NAS) Fort Worth Joint Reserve Base (JRB).

IN ATTENDANCE:

Randy Audelo, AFBCA/OL-H	LCR Michael W.S. Hayes, Com Nav Res For
CPT Dennis Beaver, NAS Fort Worth	Mike Hinsor, BCO Nav Fac Eng Com
LT D.A. Berger, JAGC,USN	Marshall Knight, South Div.Nav Fac Eng Com
Lon Biasco, EPA Superfund	Geof Meyer, TNRCC /Corr. Actions
Maj L.F. Blackshear, HQ AFCEE/ERB	Ricky Pruitt, NAS JRB FTW Env.
Mike Botwin, AFBCA/OL-H	AT1 Galen D. Robbins, NAS JRB FTW Env.
David Bragg, Booz, Allen and Hamilton	CPT J.G. Rogers, CNRF
Alvin Brown, AFBCA/OL-H	LCOR Rick Roth, NAS Public Works Off.
Sharon Carnal, BCO Nav Fac Eng Com	Liz Scagg, TNRCC-PST
J.D. Davis, NAS JRB FTW Env.	Rita W. Scott, Informatics Corp.
CPT Joseph Feaster, HQ AFCEE/ERB	Lynn Schuetter, Jacobs Engineering
Frank Grey, AFBCA/OL-H	Tim Sewell, TNRCC Region 4
Rob Harrell, South Div.Nav Fac Eng Com	CPT Patrick Vasicek, Com Nav Res For

REPORT FROM CARSWELL AFBCA

Mr. Grey opened the meeting at 1000 by asking those present to introduce themselves. He also asked those attending to take copies of the Ground Water Survey, Executive Summary, Results, and Recommendations and Conclusions as well as survey maps.

Mr. Grey then presented the agenda for the meeting, noting it was subject to change as there would be open discussion.

Special Interest Topics:

Program Review. Mr. Grey presented a list of 68 RCRA SWMUs. He said the final number of SWMUs is still to be determined by the State (TNRCC). All SWMUs have received visual site inspections. Mr. Grey said AFBCA/OL-H has initiated projects to conduct RCRA facility investigations for those which the State will require other work.

The documentation on this work needs to be revised as a number of the SWMUs have dropped out.

Mr. Grey continued the Program Review by discussing other projects underway at this time:

Low-Level Radioactive Waste:

This is aviator-related radioactive material (valves, dials, etc.) stored in three underground tubes. This material is not a problem, but AFBCA/OL-H wants to remove the material before it becomes a public perception problem. The schedule for the interim removal action, presented at the last briefing, remains the same. AFBCA/OL-H is trying to get this out during the March time frame and close the project by October.

Fire Training Area # 2

AFBCA/OL-H is still waiting for a report from the Corps of Engineers to complete this project. A risk assessment must be done so that a determination can be made regarding moving and disposing of the material. The Corps is having some trouble with the contractor that did the soil removal and it is refusing to give up the final report. Therefore the AFBCA/OL-H schedule for projection completion will slip six or eight months, depending on when the problem is resolved. The Draft Final Report may not be completed until December 1995.

Grounds Maintenance Yard,

AFBCA/OL-H is still on line for the schedule presented in November. At one time, the site base contractor disposed of hydrocarbons, gasoline and other unknown products in this area, and an effort is being made to determine the problem. Mr. Grey said there is concern this site is contributing to the hydrocarbon plume. There is a complicated monitoring system in place to monitor trichloroethene (TCE), and AFBCA/OL-H is coordinating its efforts with Aeronautical Systems Center (ASC). ASC is drilling a number of wells on the Plant Four side, as AFBCA/OL-H is doing on the base, and Mr. Grey believes a joint project should be conducted to avoid duplicating efforts. A meeting between ASC's contractor and AFBCA/OL-H's should take place in February to determine what actions each will take.

Base Service Station

AFBCA/OL-H has had to take money out of this account to pay for other work. However, a review must be made of all reports so that it can be determined if more study is needed, or what remedial actions should be taken. Mr. Grey hopes that it will be possible to bring the regulators together to get a consensus on remedial actions. This would be handled by TNRCC-PST. Capt Joe Feaster said that the Air Force Center for Environmental Excellence (AFCEE) is conducting an internal, historical review of all reports done for AFCEE which should be completed by mid-February. As a result of this review, Capt Feaster said AFCEE should be told whether to do more studies and/or what remedial actions should taken.

Other Special Interest Topics:

Hydrant System Removal

Mr. Grey said Carswell will start this project very soon. All plans have been submitted and field work can begin when final approval are received. Mr. Grey noted there was very high interest in this project. The buried tanks have been there since 1953, 17 out of 23 tanks have been removed; six remain. There is ground water and soil contamination. Mr. Grey said the primary pipelines have been grouted, and AFCEE plans are to only remove the piping from the main line to the tanks. Those lines, and the connectors, are probably leaking, rather than the tanks. The soil contamination along the lines comes from the lines as well as from a number of spills that occurred over the years during refueling operations. In response to a question, Mr. Grey said the lines would be left in place because it was not cost effective to remove them if it wasn't necessary. *will soil be tested?*

There is a 1996 (AFCEE) program to remediate the entire area-- the soil and the ground water. Displaying a map, Mr. Grey said he had concerns in regard to Marine plans to site a wash rack on this site. This will be a problem as the Air Force policy is not to put anything on a hazardous waste site. In response to questions about the 1996 remediation project, Mr. Grey said preliminary studies indicate the problems and suggest actions that could be taken. AFCEE will excavate the hot spots and probably install a bioventing system, such as is being used at the tank farm. There are no plans to pump as that would not be cost effective. AFBCA/OL-H has asked for preliminary estimates for the bioventing technology to determine if that is the best method to use or, if any new technologies are found, if the costs would be comparable. According to Mr. Grey, this entire area is contaminated and he is anxious to get this site cleaned up.

Fuel Pump Spill.

Over the Christmas holidays, about 1000 gallons of hydrocarbon were spilled, apparently from a line left unattended. Fortunately, the spill occurred on one of the Installation Restoration Program (IRP) sites, where a remedy was already in place and it was cleaned up. This area is being biovented, as an extensive hydrocarbon plume has been discovered there. Because it may be fed by five separate sites in the area, plans are to treat this entire area--POL, Unnamed Stream, and Grounds Maintenance Area--will be one unit. However, there is a money short-fall and attempts are being made to find funding.

POL Site.

The site where the spill occurred has an extensive hydrocarbon plume. AFCEE has proposed remedial actions, but nothing can be done until there is funding. AFCEE plans to do a thorough sampling of the area and a risk assessment to determine whether the ground water is a potential future hazard. AFCEE will develop a baseline, and model the ground water in that area and beyond, to estimate the rate of natural degradation. If that is not advanced enough, a bioventing system will be installed to remove the source from the soil.

Airfield Ground Water Site Characterization

Mr. Grey showed a map from the Ground Water Draft report that better defined the outer limits of the plume than the map used for the November meeting. Dichloroethene (DCE), from an unknown source, appears to be in several isolated plumes. DCE has been found in the ground water where tanks have been pulled and there has been enough sampling, with cone penetrometer to show there is a problem. However, the information will be better if

larger sampling wells are installed. Historically, this area has been used for aircraft operation and maintenance. In response to a question, Mr. Grey said there is contaminated soil and water in this area. In regards to wells, Mr. Grey said ASC has monitoring wells in the area, and AFBCA/OL-H hopes to meet with ASC representatives to see if a cooperative effort could be conducted on this site. That would prevent the drilling of unneeded wells as well as tie the entire wells system together. There are numerous wells all over the site, some drilled as early as 1980, but no records regarding their function. AFBCA/OL-H is attempting to develop one coordinated well system in order to get a picture of the plume.

Navy Partnering

Continuing the discussion of Plant Four, Mr. Grey noted the need for a partnering session with AFCEE, Plant Four and the Navy. There is serious contamination in the area between AFBCA/OL-H and Plant Four. The Navy has identified four hot spots there, and AFBCA/OL-H has discovered a number of drums that are leaking TCE. However, work cannot be done on the TCE plumes until Plant Four completes its environmental efforts. The Remedial Investigation /Feasibility Studies (RI/FS) there have not been completed and the EPA has not taken action to get these issues resolved. Mr. Grey said management for Plant Four is located at Wright-Patterson AFB in Dayton, Ohio and day to day management from that distance is difficult. As a result, AFBCA/OL-H's attempts to work cooperatively have not been successful. Mr. Grey recommended that a three-day session be arranged at a location where the participants could be away from their offices and better able to concentrate on finding solutions to these issues. Mr. Long said that in the past, a public meeting was held at Carswell Field, and he suggested a partnering meeting be held in the Large Conference Room at Carswell sometime soon.

Mr. Grey said the Waste Burial Area is another problem affected by Plant Four and the TCE plume. At the Waste Burial Area, 41 drums of TCE had been discovered. Only 2 are intact which means 39 drums are discharging products into the ground water. The Navy has identified this area as a Navy hot spot. These drums and the oil should be removed and the whole area treated at a unit. However this can't be done until Plant Four plans are completed because the contaminants co-mingle. Mr. Grey noted that another contractor gave this site a No Further Action (NFA) so there may be problems similar to this one in other areas.

Open discussion began as Mr. Grey and Mr. Long continued to speak of the benefits of an Air Force/Navy Partnering Agreement. Such a cooperative effort is needed to deal with the issue of treating new construction siting and the environmental cleanup sites. Mr. Grey is concerned about plans such as those the Marines may have to build a wash rack on one of the cleanup sites. He noted he has been designated the single point of contact for the environment for the Air Force. He must remain so as long as the Air Force continues at Carswell.

There was extensive discussion among representatives of the Navy, the Air Force and the TNRCC that explored ways to get exceptions to Air Force policy. During this discussion, Mr. Long and Mr. Grey assured the Navy of their desire to work closely and in cooperation with them, while noting they are bound by Air Force policy. As of now, AFCEE is the authority for the environmental cleanup. The environmental issue is also an

economics issue, for it is Air Force policy not to expend funds unnecessarily, i.e., not to build something that will have to be removed to clean up the site. Exceptions to the Air Force policy can only be made by Air Staff. The Base Environmental Coordinator's hands are tied. Mr. Long spoke at length on the benefits of defining the whole Carswell system with the Air Force, the Navy, and Plant Four personnel in a coordinated joint effort that would put corrective actions in place.

In response to a question from the Navy concerning whether environmental concerns or the base mission takes precedence, Mr. Grey spoke of a situation that occurred in Georgia which drives the Air Force policy. There, a project was begun and when it was discovered it was on an environmental cleanup site, it had to come down. Mr. Grey reiterated he was the single point of contact for environmental issues at Carswell as long as the Air Force remains there, so he has removal authority, but not the authority to let construction proceed on the site before it is closed out by the regulators. The Navy continued to express concerns about how construction can take place on a site as every area of Carswell has an environmental cleanup site on it, making the whole area a site. The Navy asked when it could see the environmental data. Mr. Long said he wanted them to have all the data they wanted, but he wanted to furnish it as accurately as possible. Mr. Grey said that the Air Force Handbook does not allow preliminary or draft data to be given out, but it does give permission for it to be given to the Restoration Advisory Board. Capt Rogers and LCR Hayes volunteered to be members of the RAB.

Another issue raised in open discussion was the possibility of resolving the issue of responsibility by breaking up the environmental permit. Capt Rogers asked TNRCC representative, Geof Meyer, if that might be possible. There was extensive discussion regarding who would be responsible for what, and how the responsibility for the plume and the SWMUs would be divided.

Geof Meyer said it is not unusual to do separate site specific permits. However, he could not give a definitive answer to this question. The Navy representatives made clear the Navy would like to run the base and let the AF do remediation, but Meyer said he didn't know if it were possible to separate the permits for contaminated soil and water sites.

Rogers proposed another scenario for the permit, one where there would be one permit--one permit holder--and subagreements regarding the permit and the other areas of responsibilities assigned to Plant Four and the prison hospital. Meyer said the responsibility could not be separated because of the TCE plume.

Long asked if it would be possible to establish a compliance baseline where everything, after a certain time, would be the Navy's responsibility and hence forth they would take care of activities, and the Air Force would take care of all activities prior to that baseline and continue with cleanup, working with Plant Four, etc. Mr. Grey said that "outside the fence" is still in the Air Force compliance area. However, the Capt Rogers noted that the Navy would like to see that the site permit that transfers to the Navy include the new base boundary and only their area of authority.

Suggesting another permit scenario, Rogers asked Meyer if it is possible for TNRCC to issue several permits at Carswell. All the data would still apply, but under new land boundaries with specific responsibilities assigned. He noted the Navy doesn't want the

liability or the responsibility for problems that occurred prior to it taking over the base, or they want to come to agreement with the AF for the cost of taking over--some agreed-to, up-front cost. They should have no responsibility for off base property nor any reason to have responsibility. He again asked if the State could split the permit or would a subagreement be acceptable to the State regulators. Or, if all entities involved at Carswell could agree on responsibilities, could the State regulators accept such an agreement?

Meyer responded that he was not sure a permit could handle all the proposed scenarios. LCR Hayes suggested that in a worst-case scenario, they would split territory and responsibility or go up the unified chain of command. Under this scenario, the permit would be rewritten to cite someone in the Department of Defense who dictates what responsibilities the Air Force and the Navy would each have. DOD would hold the permit and Memorandums of Understanding (MOUs) would come from DOD to the Air Force and the Navy.

When it was mentioned this might be a Superfund site and the Superfund agreements would apply, Meyer said that the State had made a declaration that the Carswell site is RCRA and as long as the base is not on the NPL, there is no way to change to CERCLA authority.

After extensive discussion during which all participants said they would like to get a better understanding from the State regarding what it will and will not allow as far as the permits are concerned, as well as a better understanding of the scope of the work and the cost, it was informally agreed that a three-day meeting would be held at Carswell Field as soon as possible. It is critical for both the Air Force and the Navy to understand what the State would accept. It is also important for the supervisors of those present to hear the State's position. Included in this meeting would be representatives of the Texas Attorney General's office, state and federal regulators, Plant Four management from Wright - Patterson Air Force Base and key Air Force and Navy staff. Dates suggested were three days during the first week of February or during the third week of February. The date will be determined by the availability of Mr. Thomas Edwards, from the State Attorney General's Office.

The meeting was adjourned at 12:30.

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