

N83447.AR.000217
NAS FORT WORTH
5090.3a

LETTER REGARDING REGULATORY REQUEST FOR ADDITIONAL INFORMATION ON
CHARACTERIZATION AND REMEDIAL ACTION AT BASE SERVICE STATION AND TANK
FARM UNNAMED STREAM NAS FORT WORTH TX
7/27/1995
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

259000



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 259

John Hall, *Chairman*
Pam Reed, *Commissioner*
R. B. "Ralph" Marquez, *Commissioner*
Dan Pearson, *Executive Director*



File: 17A-57
A.F. 17A-57
AFFE ✓
63-
259001 259

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 27, 1995

Mr. Ohlen Long, P.E.
Site Manager
Carswell Air Force Base/NAS Ft. Worth
AFBCA/OL-H
6550 White Settlement Road
Ft. Worth, TX 76114

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Carswell AFB/ NAS Ft. Worth
TNRCC Solid Waste Registration No. 65004
EPA ID NO. TX0571924042
Hazardous Waste Permit No. 50289
Airfield Groundwater Plume

Dear Mr. Long:

The Texas Natural Resource and Conservation Commission (TNRCC) has recently sent 2 letters requesting expedited characterization and remedial action for the Base Service Station (BSS) and POL Tank Farm/Unnamed Stream (POL). The BSS letter was signed by Mr. Ray Newby and dated July 10, 1995. The POL letter was signed by Paul Lewis and dated July 26, 1995. The TNRCC requests that the Airfield Groundwater Plume (Plume) be added to the BSS and POL as a high priority site.

The TNRCC has little information concerning the Plume, although we understand the area has been subjected to at least two phases of investigation. According to notes from the Base Realignment and Closure Cleanup Team (BCT) meetings held at Carswell on February 15 and 16, 1995, two cone penetrometer surveys have documented a plume consisting primarily of TCE and hydrocarbons. The plume extends from near the Trinity River on the east side of Carswell to at least the Alert Apron. Elevated concentrations of TCE near the Alert Apron and a few non-detect wells on Carswell indicate a possible source of contamination on Carswell that is separate and distinct from the plume originating on AFP 4 along Carswell's western border. There is a distinct possibility, however, that the plume may be an extension of, or commingled with, the AFP 4 TCE plume.

The TNRCC requests that all available information be assembled in order to determine the condition of the plume and to identify any data gaps requiring further investigation. The TNRCC also asks for

Mr. Ohlen Long, P.E.

Page 2
July 27, 1995

any information regarding the sources of the contaminant plume and how an expedited remediation program will be funded beginning in Fiscal Year 1996, if not sooner. The TNRCC requests that this information be submitted within 60 days of receipt of this letter.

In addition, TNRCC requires that Carswell implement interim corrective measures as soon as possible to recover free product and prevent the groundwater plume from further migration. An Interim Corrective Measures Work Plan (ICM) must be submitted to the TNRCC within 60 days of the receipt of this letter.

With regards to the documented contaminant releases to groundwater, Section 335.4 of the Texas Administrative Code (TAC) states that no person may cause, suffer, allow, or permit the collection, handling, storage, processing, or disposal of industrial solid waste or municipal hazardous waste in such a manner so as to cause:

- a. The discharge or imminent threat of discharge of industrial solid waste or municipal hazardous waste into or adjacent to the waters in the state without obtaining specific authorization for such a discharge from the Texas Natural Resource Conservation Commission;
- b. The creation and maintenance of a nuisance; or
- c. The endangerment of the public health and welfare.

In addition, §26.121 of the Texas Water Code states that no person may engage in any activity which causes or will cause pollution of any water in the State. Please be advised the TNRCC has judged that the contamination associated with the Airfield Groundwater Plume poses considerable and unacceptable risk to human health and the environment. Failure to perform the actions specified or to participate in dispute resolution could result in referral for enforcement action. The Commission is authorized to require corrective action, assess administrative penalties of up to \$10,000 per day or both should your facility fail to adequately respond.

The TNRCC staff requests that the BCT include this study area on its August 10, 1995 meeting agenda. In addition, the TNRCC staff would like to be included in a scoping meeting for the ICM and any Investigation Work Plan. Please coordinate with Mr. Geoffrey Meyer for an agreeable meeting time.

259003

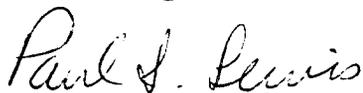
Mr. Ohlen Long, P.E.

Page 3

July 27, 1995

If you have any questions or need further assistance with this matter, please contact Mr. Geoffrey Meyer with the Federal Facilities Team in Austin at (512) 239-2577, mail code MC 127.

Sincerely,



Paul S. Lewis, Manager
Corrective Action Section
Texas Natural Resource Conservation Commission

PL/GM

cc: Charles Ray Hatch, P.E., Project Manager, Southwest Division,
HQ AFBCA/SW, HQ AFBCA/LD, 1700 N. Moore St., Ste.
2300, Arlington, VA, 22209-2802
H. E. Cox, Commander, U.S. Navy, Environmental Officer, NAS
Dallas, TX 75211-9501
Joseph A. Feaster, Captain, USAF, BSC, Team Chief, HQ
AFCEE/ERB, 80011 Inner Circle Dr., Ste. 2, Brooks
AFB, TX 78235
Gary Baumgarten, Superfund Enforcement Section, EPA Region VI
Tim Sewell, Region 4 Office, Arlington

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE