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NAS FORT WORTH  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMOVAL  
CLOSURE OF FUEL HYDRANT SYSTEM NAS FORT WORTH TX  
11/22/1995  
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 366

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R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
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File: 17A-58  
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**TEXAS NATURAL RESOURCE CONSERVATION COMMISSION**

*Protecting Texas by Reducing and Preventing Pollution*

November 22, 1995

**CERTIFIED MAIL**

Mr. Charles A. Rice  
Team Chief  
Base Closure Restoration Division  
Air Force Center for Environmental Excellence  
8001 Inner Circle Drive, Suite 2  
Brooks AFB, Texas 78235-5328

Re: Regulatory Review of Draft Report - Removal/Closure of the Fuel Hydrant System at Carswell (NAS Ft. Worth JRB) (Tarrant County), Texas

Dear Mr. Rice:

We have completed our review of the Draft Report - Removal/Closure of the Fuel Hydrant System at Carswell (NAS Ft. Worth JRB) dated August 1995. After careful review of all the information provided, the following comments are provided for your review:

1. General comments and report organization:

If possible, the text portion of the report should be duplex copied, as the appendices are, to reduce the overall thickness of the report to conserve file space and paper.

The report is essentially divided into separate sections regarding construction activities, subsurface investigation, and results. The information included in the report appears to comply with Title 30, Texas Administrative Code (TAC), Section 334.55 (b) (6) regarding information required for permanent documentation of underground storage tank (UST) system closure and removal from the ground; however, the information regarding closure of the USTs at Pump Station C, for example, is scattered among the various sections of this multi-volume report. It would be much more convenient for the reviewer to access all of the information regarding UST closure construction activities, release determination, and waste handling if this information were compiled into one section for Pump Station C.

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Since the sample results and areas of concern of the Fuel Hydrant System are addressed in the report by designated geographical areas, it would be preferable if the construction activities, site investigation, and analytical results could be combined and grouped by these geographical areas also.

The chronology of field activities does not indicate when soil samples were collected with the removal of the Station C USTs nor does it indicate when the Geo Probe investigation was conducted. The chronology does indicate when the Notice of Construction was submitted for the removal of the USTs but it does not indicate when the TNRCC was notified of the removal activities between 24 and 72 hours prior to the activities as required by TAC 334.6 (2) (C).

2. Tables and figures:

Two of the figures, one titled Fuel Hydrant System Pipeline Following Removal/Abandonment and another titled Drive Point Sample Locations Along Fuel Hydrant System are both labeled and referenced as Plate 1. This created some confusion upon initial review.

The tables, figures, and cross sections should follow immediately after the text in which they are referenced. The cross sections are grouped together while the corresponding text follows a few pages afterward. Likewise, some of the tables of positive detections for the geographical areas of concern are separated from their corresponding text and within the text for different geographical areas.

The titles of the tables of analytical results should include the identification names and numbers given to the geographical areas discussed in the text.

The tables of analytical results should present all samples collected and analyzed as well as each analytical method performed on the sample. Specifically, it appears that only the positive detects are provided in the tables for the Geo Probe sampling results. Also, Tables 3-3 through 3-6, soil sample results, only list TPH analyses results when other analyses such as BTEX were also conducted. All results of all analyses conducted, detected or not, should be shown in table form.

Analytical results for BTEX and PAH analyses only show the total BTEX and total PAH results. This format is fine when no BTEX or PAH compounds were detected; however, for samples where BTEX and/or PAH compounds were detected the concentrations of the individual compounds should be indicated separately from the total BTEX and/or PAH concentration.

The cross sections that are provided present a good graphical image of lithologies encountered. It would be beneficial if the orientation of the section line could be provided on the ends of the cross sections (i.e., for section A - A' also indicate SE - NW). Also, the vertical scale shown on the cross sections should be oriented vertically.

Since the discussion of the site investigation findings is divided into designated geographical areas, it would be helpful for cross reference purposes if the boundaries between areas (even if arbitrarily selected) could be represented on one of the large area-wide maps.

Former Pumping Station E is referenced in the text of the report but is not shown on the maps provided with the report. The location of Station E and the corresponding building identification number should be described in the text as well as indicated on the area wide maps.

3. Pumping Station C UST removal and site investigation:

As indicated in the above discussion regarding the chronology of field activities, please provide the date when 24 to 72 hour notification was provided to the TNRCC Region 4 Field Office. Also indicate the name(s) of TNRCC personnel that inspected the site at the time of UST removal activities.

Provide the names of the UST removal contractor(s) and their respective license and certification identification.

Indicate the dates that the amended TNRCC UST registration forms were forwarded to the TNRCC Region 4 Field Office and the TNRCC PST Division/ Registration Section.

4. Fuel Hydrant System closure and site investigation:

Analytical discrepancies between immunoassay results and off-site laboratory results are documented in the report. Please clarify which samples were identified as having discrepancies and why the respective immunoassay data should be considered as valid and representative of actual site conditions. Additionally, please discuss the confidence that exists between the correlations of immunoassay, off-site laboratory, and H-Nu data.

Some the geographical areas discussed in the report have previously been addressed in regards to prior leaking petroleum storage tank (LPST) investigations. It would be very helpful if the LPST identification numbers for the geographical areas could be cross referenced in the text, at least on the lead-in headers and table headings. According the

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TNRCC records, the following LPST ID numbers are related to the corresponding geographical areas described in the report;

Area #	LPST #	Carswell Bldg. #	Description
1	104819	1069, 1156-58	POL Tankfarm
5	108711	4150	Pump Station A
6	108712	4152	Pump Station B
8	108713 & 95220	4154 Spot 35	Pump Station D

5. Conclusions:

The conclusions state that a program to remove contamination found in relation to the fuel hydrant system is planned. The Air Force needs to provide additional information in a letter as to when the removal will take place as well as the additional investigation and remedial design.

Should you have any questions, please contact me at 512/239-2200. Your cooperation in this matter is appreciated.

Sincerely,



Ray Newby  
Federal Facilities Coordinator, Remediation Unit I  
Responsible Party Remediation Section  
Petroleum Storage Tank Division

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carswhyd.rev

- cc: Ohlen Long, AFBCA, Carswell Air Force Base  
(6550 White Settlement Road, Ft. Worth, Texas 76114-3520)
- Gary Baumgarten, USEPA Region 6  
(1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733)
- Geof Meyer, TNRCC Industrial and Hazardous Waste Division
- Tim Sewell, TNRCC Region 4 Field Office  
(1019 N. Duncanville, Rd., Duncanville, Texas 75116-2201)

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