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NAS FORT WORTH
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMOVAL AND UPGRADE OF UNDERGROUND STORAGE TANK AND INTERIM REMEDIAL ACTION AT GOLF COURSE MAINTENANCE YARD NAS FORT WORTH TX
1/29/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

File: 17G
A.F.

NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 372

Barry R. McBee, *Chairman*
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File: 17A-72
A.F. 372

1996 FEB -5 AM 9:32

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

January 29, 1996

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

CERTIFIED MAIL

Re: Naval Air Station Ft. Worth JRB/Carswell AFB (NAS Ft. Worth)
TNRCC Solid Waste Registration No. 65004
EPA ID NO. TX0571924042
Hazardous Waste Permit No. 50289
Draft Plan - Removal/Upgrade of Underground Storage Tanks and Interim Remedial Action at the Golf Course Maintenance Yard at NAS JRB Ft. Worth (Plan)

Approval with Modifications

Dear Mr. Rice:

The Industrial and Hazardous Waste Division's Corrective Action Section has completed its review of the above referenced Plan dated October, 1995. The Plan consists of four parts, including a Work Plan, Construction Quality Plan, Quality Assurance Plan, and Health and Safety Plan. Our review was limited to the investigation and corrective measures proposed for the Golf Course Maintenance Yard. The Texas Natural Resource Conservation Commission's (TNRCC) Petroleum Storage Tank Division will review the proposed plans for the underground storage tanks and respond in a separate letter.

We approve of the proposed Plan for the Golf Course Maintenance Yard, contingent upon acceptance and incorporation of the following comments into the Plan:

Work Plan:

1. Although never stated in the Plan, we assume that the Golf Course Maintenance Yard will be cleaned to Risk Reduction Rule Standard 1 (RRS 1), i.e., to background levels or acceptable Practical Quantitation Limits (PQL), whichever is greater. However, since no

background levels have been established for inorganic constituents, we assume the PQL will be the cleanup standard for all constituents encountered.

2. Section 2.2.3, page 2-5, last paragraph - The Plan should specify what criteria are to be used in the field to select the 10 soil boring locations. The criteria should include visible staining, odor, historical knowledge of releases and/or site use, and response to organic vapor analyzers.

3. Section 2.2.3, page 2-6, first and third paragraphs - The hand augured soil boring samples and the confirmation samples sent to the off-site laboratory should be analyzed for the complete list of Appendix IX constituents, as per Hazardous Waste Permit No. HW-50289.

4. Section 2.4, page 2-13 - Please state that all contaminated soils and investigative derived wastes (IDW) will be disposed in an appropriate manner based on a waste characterization conducted in accordance with 30 Texas Administrative Code (TAC) §335, Subchapter R. A typographical error in the second paragraph states that the handling of investigative derived wastes are addressed in Section 1.1.6 in the Field Sampling Plan, rather than Section 1.1.7.

5. Project Schedule, Section 4.0 - Although the text states that hand-auger borings will be deepened and additional samples analyzed if contamination occur at 24 inches in depth, there is no additional sampling activity specified on the Project Schedule (page 4-2). The schedule also fails to designate time for laboratory analyses of the post-excavation confirmation samples. Furthermore, no time for additional excavation and confirmation samples has been designated, should the initial confirmation samples indicate that the first excavation was not successful in removing all the contamination. Please confirm that these tasks are included in the schedule of work or modify the Plan's schedule to accommodate these tasks. Under no circumstances should the Air Force construct a slab over a contaminated site if the site cannot meet RRS 1 or 2.

6. Please notify the TNRCC's Region 4 inspector at least 14 days in advance of corrective action, including any sampling events.

Construction Quality Plan:

1. Please specify who will notify the TNRCC Regional Office in Duncanville, Texas in accordance with Item No. 6 above.

Quality Assurance Project Plan:

1. Please add Mr. Tim Sewell, TNRCC Region 4 inspector, to the document distribution list on page xiv.

2. Attachment 1, Field Sampling Plan, Section 1.1.1 - Please add waste characterization sampling to the list of field operations.

3. Attachment 1, Field Sampling Plan, Section 1.1.3 - As stated above in Item 3 under Work Plan, all samples sent to the laboratory must be analyzed for all Appendix IX constituents.

4. Attachment 1, Field Sampling Plan, Section 1.1.7 - Waste soils and IDW must be characterized in accordance with 30 TAC §335, Subchapter R, prior to disposal. Any soils destined to go back into the original excavations must be analyzed to verify compliance with the closure/cleanup standard.

5. Section 7.2, Analytical Procedures - Those PQL's quoted in Table 7.2.6-1, page 7-14, which exceed drinking water standards and/or health based standards (RRS 2) for those constituents, cannot be accepted by the TNRCC without a reasonable explanation.. Please note that some of the proposed PQL's exceed the PQL's cited in 40 CFR Appendix IX for the same analytical methods.

   The PQL's proposed for metals (Table 7.2.15-1, page 7-54) using Method 6010 are unacceptable because they exceed health based standards for drinking water and groundwater protection under RRS 2. Please use the EPA's 7000 series approved analytical methods for antimony, arsenic, cadmium, lead, nickel, selenium, and silver. Arsenic is of particular concern because of its extensive use as a herbicide on golf courses.

Health and Safety Plan:

No additional comments.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual closure/corrective action fails to comply with these requirements, the burden remains upon NAS JRB Ft. Worth and the AirForce to take any necessary and authorized action to correct such conditions. A TNRCC field inspector may review your certification information and may conduct a closure inspection of the site.

If you have any questions or need further assistance with this matter, please contact Mr. Geoffrey Meyer in the Corrective Action Section in Austin at (512) 239-2577, mail code MC127.

Sincerely,

Paul S. Lewis

Paul S. Lewis, Manager
Corrective Action Section

PL/GM

cc: Joel Sanders, Southern Division, Naval Facilities Engineering Command, P.O. Box 190010, North Charleston, SC 29419-9010
Stacy Gent, Department Head, Environmental Department/Code110, Department of the Navy, Building 1215, NAS JRB Ft. Worth, Texas 76127-6200
Ohlen Long, P.E., AFBCA, 6550 White Settlement Road, Ft. Worth, Texas 76114-3520
Judith Black, USEPA Region 6

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