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NAS FORT WORTH
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LETTER REGARDING REGULATORY REVIEW AND APPROVAL FOR REPLACING
EXCAVATED SOILS BACK INTO SOLID WASTE MANAGEMENT UNIT NAS FORT WORTH
TX
8/9/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 306

File: 17A-46
A.F. 30801

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 9, 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
RETURN RECEIPT REQUESTED

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
Solid Waste Management Unit (SWMU) 60
Request for Approval for Actions To Be Taken for Project 94-7007 Normally Occurring
Radioactive Material Removal, Dated August 1, 1996

Request for Modifications

Dear Mr. Rice:

The staff of the Texas Natural Resource Conservation Commission (TNRCC) Corrective Action Section has completed its review of the above referenced request from Air Force Center for Environmental Excellence (AFCEE). The request included an August 1, 1996, report by Metcalf and Eddy which characterized background soil conditions at SWMU 60 as well as the SWMU's condition after the Low Level Radioactive Waste (LLRW) was removed from the unit. The report letter was entitled Background Soil Summary Letter Report and Comparison of Characterization and Confirmation Sample Analytical Results to Background Conditions. AFCEE's letter also requested approval to return the soils resulting from the removal action back into the original excavation.

The analytical results furnished in Metcalf and Eddy's letter/report indicate that the soils at SWMU 60 are in excess of background for Radian-226; however, they are below the Disposition Criteria for Radian-226 as provided in the Texas Regulations for Control of Radiation (TRCR), Part 21,1302(c). As such, it appears the soils can be closed in accordance with Risk Reduction Standard 2 (RRS 2, 30 Texas Administrative Code (TAC) §335, Subchapter S), provided the Air

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Force submits a document to fulfill the deed certifications requirements of 30 TAC, §335.560. Final closure of this SWMU cannot be approved until the Air Force demonstrates that any groundwater contamination that may be associated with this SWMU does not pose a threat to human health and/or the environment.

We understand that the Air Force is about to begin an evaluation of the Off-site Weapons Storage Area that includes an investigation of the groundwater quality at the LLRW. Deed certification for SWMU 60 may be incorporated into the certification for the entire Off-site Weapons Storage Area, since the area will likely be excised from the Air Force as a single parcel.

The Air Force's request to place the excavated soils back into the SWMU excavation is approved. Our decision is based on the analytical results, which indicate the soil contaminants are below background levels.

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 Title 30 Texas Administrative Code (TAC) §335.4. If the actual closure/corrective action fails to comply with these requirements, the burden remains upon the Air Force 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, or via the e-mail address gmeyer@smtpgate.tnrc.state.tx.us.

Sincerely,



Paul S. Lewis, Manager
Corrective Action Section
Industrial and Hazardous Waste Division

Mr. Charles A. Rice

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PL/GM

cc: Mr. Joel Sanders, Southern Division, Naval Facilities Engineering Command, P.O. Box
190010, North Charleston, SC 29419-9010
Ms. Stacy Gent, Department Head, Environmental Department/Code 110, Department of
the Navy, Building 1215, NAS JRB Ft. Worth, Texas 76127-6200
Mr. Ohlen Long, P.E., AFBCA, 6550 White Settlement Road, Ft. Worth, Texas 76114-
3520
Ms. Judith Black, USEPA Region 6
Mr. Tim Sewell, TNRCC Region 4 Office, Duncanville

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