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NAS FORT WORTH  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT QUALITY  
PROGRAM PLAN AT UNNAMED STREAM NAS FORT WORTH TX  
10/10/1996  
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

File: 17G  
A.F.

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NAVAL AIR STATION  
FORT WORTH JRB  
CARSWELL FIELD  
TEXAS

ADMINISTRATIVE RECORD  
COVER SHEET

AR File Number 310

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



File: 17A-48  
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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

October 10, 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  
Draft Quality Program Plan  
Remedial Action at the Unnamed Stream, Carswell AFB, August 1996

### Approval With Modifications

Dear Mr. Rice:

The Corrective Action Section of the Texas Natural Resource Conservation Commission (TNRCC) has completed its review of the above referenced Program Plan (Plan). The Plan proposes to remove contaminated soils from the Unnamed Stream in order to comply with Risk Reduction Standard 1 (RRS 1) of the Risk Reduction Rules, 30 Texas Administrative Code §335, Subchapter S (RRR). The Unnamed Stream is labeled Solid Waste Management Unit (SWMU) No. 64 in hazardous waste Permit HW-50289.

The following comments are based upon our review of the Field Sampling Plan, Quality Assurance Project Plan, and Construction Quality Plan contained within the Draft Quality Program Plan:

1. Contrary to Section 2.3 of the Environmental Sampling and Analysis Plan, Carswell AFB is **not** on the National Priorities List and is **not** subject to the provisions of a Federal Facilities Agreement issued for Carswell AFB. Although CERCLA shares many valuable program elements with RCRA, Carswell must comply with RCRA program requirements as stipulated in its hazardous waste Permit HW-50289 and State of Texas regulations. The RFI requirement specified in Permit HW-50289 should be referenced in Section 1.0.

Mr. Charles A. Rice

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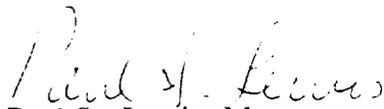
2. Analytical Method 6010A does not include results for arsenic, lead, and selenium (Table 7.2.19-1, Appendix A). Please analyze for these constituents that have been observed in previous investigations.
3. Analytical Method 8260 does list acetone as an analyte. Please test for acetone, a constituent seen in previous investigations.
4. Unless there are compelling reasons to the contrary, please analyze each sample for VOCs, BETX, and metals. The analytical frequencies proposed for SVOCs and TPH are acceptable. We invite the Air Force to submit any analytical data that supports an abbreviated analyte list.
5. Please substitute discrete samples for the proposed composite samples.
6. We suggest that the Air Force study the general sample locations proposed in Section 3.1 of the Construction Quality Plan in order to determine if fewer sampling locations in the narrow channel will adequately characterize the final excavation. In addition, we request that the Air Force concentrate its soil/sediment samples in the lower portions of the channel, rather than taking samples along the top of the banks. In the future, please submit a plan view and cross-section of the sampling locations in the channels.
7. Permit Provision VIII. C. requires notification of the TNRCC Region 4 office in Duncanville at least 10 days prior to any sampling activity in order to afford our inspectors the opportunity to split samples. Mr. Tim Sewell, our Federal Facility Inspector for Region 4, can be reached at (214) 298-6171.

This letter constitutes approval of the August 1996, Draft Quality Program Plan for Remedial Action at the Unnamed Stream contingent upon incorporation of the modifications listed above. The Air Force may begin remedial action without delay.

Mr. Charles A. Rice  
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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@tnrcc.state.tx.us.

Sincerely,



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

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. Michael W. S. Hayes, Esq., GM-0905-14//CDR(sel), JAGC, USNR Counsel, Office of the Asst. General Counsel, 4400 Dauphine St., New Orleans, LA 70146-5000  
Mr. Tim Sewell, TNRCC Region 4 Office, Duncanville  
Ms. Ginny King, Natural Resource Trustees, (MC 142)

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**ADMINISTRATIVE RECORD**

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