

N83447.AR.000284
NAS FORT WORTH
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON RELEASE OF
PETROLEUM HYDROCARBONS AT TANK FARM SITE ST14 NAS FORT WORTH TX
11/4/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

311 0



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 311

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

1996 NOV 14 11:03

File: 17A-39
A.F.

311311

TEXAS NATURAL RESOURCE CONSERVATION C

Protecting Texas by Reducing and Preventing Pollution

November 4, 1996

CERTIFIED MAIL

Mr. Joe Dunkle
Base Closure Restoration Division
Air Force Center for Environmental Excellence
3207 North Road
Brooks AFB, Texas 78235-5328

Re: Release of Petroleum Hydrocarbons at the Carswell Air Force Base Naval Air Station Fort Worth Joint Reserve Base, POL Tank Farm Site ST14, Carswell (NAS Ft. Worth JRB) (Tarrant County), Texas
(LPST ID No. 104819, Priority 3.2, Facility ID No. 009696)

Dear Mr. Dunkle:

We have completed our review of all available file information for the above referenced incident pertaining to the Remedial Action Plan for the Risk Based Remediation of Site ST14 report submitted on May 7, 1996. After careful review of all the data provided and pursuant to Title 30, Texas Administrative Code (TAC), Section 334.78 - 334.81, this Office concurs with your proposed remedial action plan. However, there are still some concerns that should be addressed in order to further address the contamination at this site. Therefore, the following actions should be pursued.

1. This Office is in agreement that site ST13 (the area east of Roger Drive) should be addressed under Title 31 TAC Chapter 335, the RCRA rules, which is regulated by the TNRCC's Industrial and Hazardous Waste (IHW) Division. Consequently, the proposed remedial action plan does not apply to Site ST13. In addition, although this Office agrees that the french drain should be removed, as it may be a pathway for upgradient contaminants associated with site ST14, the removal of the drain should be coordinated with the IHW Division.

Removal/abandonment of the oil/water separator should also be coordinated with the IHW Division of the TNRCC. Although it is agreed that the oil/water separator may be continuing source of contamination, it's location on Site ST13 and the contaminants of concern warrant that the IHW Division coordinate removal/abandonment activities.

2. This Office agrees that both biosparging and bioventing, working congruently, is an effective method to address subsurface contamination at the above referenced site. Although bioventing is mentioned as part of the remedial system, it does not appear that bioventing is an active part of the remedial system. Therefore, please provide an explanation of the role that bioventing plays in remediation of subsurface contamination at the above referenced site.

Please provide well construction details for a typical bioventing well. Also, provide a system flow process diagram that includes ports for the collection of samples (CO₂ and DO) and the measurement of flow and sparge pressure at each well head.

3. This Office concurs with the proposed monitoring and system performance of the remedial system. In addition to monitoring DO levels, CO₂ levels should also be monitored as an indicator of biodegradation activity.

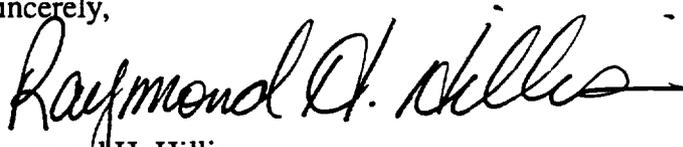
Please note that corrective action activities must be performed by or coordinated by an environmental consulting firm registered as a Corrective Action Specialist (CAS) and all reports, proposals, and other documents submitted to the Texas Natural Resource Conservation Commission (TNRCC) **must have the CAS registration number included** pursuant to 30 TAC §334 Subchapter J. Reports prepared by a consulting firm not registered as a CAS by the TNRCC may be rejected. **Please reserve the use of telefax machines for submitting proposals and data for LPST cases that rank as new priority 1's, for emergency abatement activities, and for field activity reports (Form No. TNRCC-0017).**

A written response to this letter that adequately addresses the completion of the aforementioned items should be submitted to this Office within forty-five (45) days from the date of this letter. **Please note that all correspondence must include the LPST and Facility ID Numbers and should be submitted to both the local TNRCC Regional Field Office and to the Central Office in Austin.**

Pursuant to 30 TAC Section 334.82 (b), if you determine that contamination from the release has migrated off-site, then you are required to notify the affected landowner(s). Please note that landowners may include state and local owners of right-of-way properties. **Please provide documentation that the affected landowner(s) has/have been notified.**

Should you have any questions, please contact me at 512/239-2200. Your prompt attention to this matter will be appreciated.

Sincerely,



Raymond H. Hillis
Coordinator, Remediation Unit III
Responsible Party Remediation Section
Petroleum Storage Tank Division

RHH/rhh
104819.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)

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE