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LETTER REGARDING REGULATORY CONCERNS REGARDING AREA OF CONCERN 7
AND SOLID WASTE MANAGEMENT UNITS 64, 67 AND 68 NAS FORT WORTH TX
4/28/1997
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 571

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



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

April 28, 1997

Mr. Joseph R. Dunkle
Team Chief
Environmental Restoration Division
Air Force Center for Environmental Excellence
8001 Inner Circle Drive, Suite 2
Brooks AFB, Texas 78235-5328

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
Site SD-13 Remedial Action Plan

Dear Mr. Dunkle:

The Corrective Action Section of the Texas Natural Resource Conservation Commission (TNRCC) has reviewed the Air Force Center for Environmental Excellence (AFCEE) draft letter of March 3, 1997. The letter responds to the TNRCC's letter of November 8, 1996, concerning the Remedial Action Plan (RAP) for sites ST-14 and SD-13. These two sites include Solid Waste Management Units (SWMU) 64, 67, and 68, and Area of Concern (AOC) 07.

1. The groundwater at site SD-13 will be protected for residential use and high aquatic life habitat in the nearby surface waters of Farmers Branch and the Trinity River. The use of cleanup levels based on industrial groundwater use and/or PST Beneficial Use II standards off-site are not acceptable. As a result, the list of COPCs for soil and groundwater should be reevaluated for compliance with 30 Texas Administrative Code (TAC) §335, Subchapter S.
2. We appreciate the discussion in Item 4 of AFCEE's letter concerning the toxicity of fuel products.
3. Please include monitor well OT12-MW15C in the groundwater monitoring program proposed in AFCEE's April 1996 Remedial Action Plan (Figure 10-1). OT12-MW15C was the well that contained chlorinated solvents.

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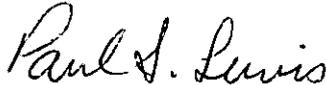
4. Final closure of site SD-13 cannot occur until the groundwater plume in that area has demonstrated compliance with 30 TAC, Subchapter S. However, transfer of the property may occur upon demonstrating that the remedial action system is fully functional.
5. We cannot respond to AFCEE's contention that the proposed remedy is adequate to protect human health and the environment until all Appendix IX constituents are compared to 30 TAC §335, Subchapter S cleanup levels. At this time, it appears that AFCEE's fate and transport model only addresses those soil and groundwater contaminants that exceed PST's Beneficial Use Category II for an industrial site, i.e., benzene. This opinion is based upon information contained in Section 1.1.2, Table 4.1, and Table 4.2 of the April 1996 Remedial Action Plan for the Risk-Based Remediation of Site ST-14.

In addition, we would like to note that the reason chlorinated solvents are diminishing in monitor well OT12-MW15C may be the result of the contaminants moving downgradient past the well. As such, we are still concerned that the fate and transport model (Bioplume II) does not formally address the attenuation of the chlorinated solvents. AFCEE must adequately demonstrate that the chlorinated solvents will attenuate to acceptable levels before reaching a point of exposure established at the potential facility boundary (excessed property) and/or the surface streams.

6. We acknowledge that the ferric iron precipitate at the shore line of Farmers Branch is probably resulting from oxidation of ferrous iron in the groundwater. We continue to ask that the revised RAP address potential surface water impacts from the groundwater contaminants that reduced the iron, the chlorinated solvents seen in monitor well OT12-MW15C, and the free product observed in monitor well SD13-MW07.

If you have any questions or need further assistance with this matter, please contact Mr. Mark Weegar in the Corrective Action Section in Austin at (512) 239-2360, mail code MC127, or via the e-mail address mweegar@tnrcc.state.tx.us.

Sincerely,


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

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PL/GM

cc: 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
Mr. Michael W S. Hayes, Esq., GM-0905-14//CAR(sel), JAGC, USNR Counsel, Office of the Asst. General Counsel, 4400 Dauphine St., New Orleans, LA 70146-5000
Mr. Rafael Casanove, Superfund Section, USEPA Region 6
Mr. Tim Sewell, TNRCC Region 4 Office, Duncanville
Ms. Ginny King, Natural Resource Trustees, PCD Division (MC 142)

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