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NAS FORT WORTH
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LETTER REGARDING U S EPA REGION VI REVIEW AND COMMENTS ON DRAFT SITE
CHARACTERIZATION RECREATIONAL VEHICLE FAMILY CAMPING AREA AND FUEL
PIPELINE AREAS NAS FORT WORTH TX
9/23/1997
U S EPA REGION VI



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 401



401
File: 17A-70
A.F.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

SEP 23 1997

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Mark A. Weegar, Project Coordinator
Texas Natural Resource Conservation Commission
Industrial and Hazardous Waste Division
Corrective Action Section
Federal Facilities Team
P.O. Box 13087
Austin, TX 78711-3087

Re: Comments
Draft Site Characterization Report
Recreational Vehicle Family Camping Area
Fuel Pipeline Areas
Naval Air Station Fort Worth Joint Reserve Base
EPA ID No. TX0571924042

Dear Mr. Weegar:

The U.S. Environmental Protection Agency (EPA) has performed a technical review of the U.S. Air Force's (USAF) document titled "Draft Site Characterization Report for the Recreational Vehicle Family Camping and Fuel Pipeline Areas" (March 1997) for Naval Air Station Fort Worth (NAS FW) Joint Reserve Base (formerly Carswell Air Force Base). Enclosed for your review are EPA's comments on the Recreational Vehicle Family Camping Area portion of the Draft Site Characterization (SC) Report. These comments are being provided based on EPA's representation on the BRAC Cleanup Team for NAS FW.

This correspondence is concurrently being sent to USAF for their review and should not be considered as the final regulatory approval of the Draft SC Report. If you have any questions concerning our comments, please call me at (214) 665-7437.

Sincerely yours,

Rafael A. Casanova

Rafael A. Casanova
Remedial Project Manager
BRAC Cleanup Team

Enclosure

cc: ✓ Mr. Olen R. Long (BEC/BTC), AFBCA
Mr. Charles Rice, AFCEE

U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS
U.S. AIR FORCE
DRAFT SITE CHARACTERIZATION REPORT
RECREATIONAL VEHICLE FAMILY CAMPING AND FUEL PIPELINE AREAS
NAVAL AIR STATION FORT WORTH JOINT RESERVE BASE

The U.S. Environmental Protection Agency (EPA) has performed a technical review of the U.S. Air Force's (USAF) "Draft Site Characterization Report for the Recreational Vehicle Family Camping and Fuel Pipeline Areas" (March 1997) for Naval Air Station Fort Worth (NAS FW) Joint Reserve Base (formerly Carswell Air Force Base). The following comments, on the Recreational Vehicle Family Camping Area (RV Fam Camp) portion of the Draft Site Characterization (SC) Report, are presented alphabetically and by the chapters, sections, and pages corresponding to the Draft SC Report. It is our understanding that the Texas Natural Resource Conservation Commission's (TNRCC) Petroleum Storage Tank Division will provide comments on the remaining portions of the Draft SC Report.

GENERAL COMMENT

A. Deed Recordation Requirements:

EPA's Comments

USAF's Draft SC Report should include a document intended to be used in fulfilling deed recordation requirements if appropriate.

SPECIFIC COMMENTS

EXECUTIVE SUMMARY

B. Executive Summary - Page xiii:

USAF's Draft SC Report

USAF recommends that the RV Fam Camp be managed under Category 1 (no further action).

EPA's Comments

USAF should include a statement that specifies which of the TNRCC's Risk Reduction Standards are applicable to the RV Fam Camp.

CHAPTER 1.0 - INTRODUCTION

C. Section 1.2.4 - Regional Geology and Hydrogeology, Page 1-3:

USAF's Draft SC Report

USAF provided a brief description of the regional geology.

EPA's Comments

USAF should include a stratigraphic map in the Draft SC Report that represents the subsurface at the RV Fam Camp. This detailed cross-section of the study area should utilize the information obtained from the field investigations.

CHAPTER 2.0 - PROJECT ACTIVITIES

D. Section 2.4.3.1 - Screening Action Levels, Page 2-19:

USAF's Draft SC Report

USAF states that the screening action levels (SALs) for the RV Fam Camp area were based on the maximum background concentrations measured during the Oil/Water Separator Assessment and RCRA Facility Investigation conducted by Law Environmental, Inc. in 1994. USAF adds that the background soil samples were obtained from five boreholes drilled within the vicinity of the investigation area to depths ranging from 4 to 14 feet below the ground's surface¹. Table 2-5 (Basis for TNRCC Screening Action Levels (SALs) for the RV Fam Camp Site Investigation) lists the SALs chosen by USAF for the RV Fam Camp.

EPA's Comments

USAF should provide additional information in the Draft SC Report that justifies the selection of background concentrations. EPA does not believe that the use of maximum concentrations of inorganics is appropriate for use as background concentrations and comparison to soil analytical data or TNRCC's media-specific concentrations (MSCs). The technical issues that should be addressed by USAF include selection of background sampling locations, considerations in selection of sampling procedures, and statistical analyses.

¹The "Work Plan for the Site Assessment, Investigation, and Characterization of the Recreational Vehicle Family Camping Area" (July 1996, Page 3-7) states that characterization of background conditions will be determined by the placement of a soil boring outside the area of potential contamination.

USAF should consider the protocols described in the following EPA guidance documents in the establishment of background for all environmental media of concern. These documents, not all inclusive, are titled "Statistical Analysis of Ground Water Monitoring Data at RCRA Facilities" (Addendum to Interim Final Guidance, June 1992), "Statistical Analysis of Ground Water Monitoring Data at RCRA Facilities" (Interim Final Guidance, April 1989, EPA/530-SW-89-026), and "Determination of Background Concentrations of Inorganics in Soils and Sediments at Hazardous Waste Sites" (December 1995, EPA/540/5-96/500).

Although the document has not been approved by TNRCC, USAF should also consider USAF's "Draft Base-Wide Background Study" (January 1997) in the development of background for the RV Fam Camp. The Draft SC Report may require amendment based on TNRCC's comments concerning this background study.

For clarification purposes, the objective of the RCRA Facility Investigation is to delineate the full vertical and horizontal extent of contamination to background conditions. Therefore, it is imperative that true background conditions are established for the RV Fam Camp. Once background conditions are established, USAF should determine whether the analytical data collected to date are representative of the full vertical and horizontal extent of contamination, if present, at the RV Fam Camp. EPA realizes that in some cases delineating the extent of contamination to unaffected background may not be possible or practical. USAF should discuss this issue with EPA and TNRCC if this is the case at NAS FW.

Additionally, USAF must demonstrate in the Draft SC Report that lower levels of quantitation are not possible if Practical Quantitation Limits are used as the basis for the selection of action levels (e.g., the PQLs are greater than their respective background and/or MSCs).

CHAPTER 3.0 - PROJECT INVESTIGATIONS

E. Table 3-12 - Summary of RV Fam Camp Subsurface Soil Sample Detected Results, Page 3-33:

USAF's Draft SC Report

Table 3-12 provides a comparison of the soil sampling results with the TNRCC screening levels.

EPA's Comments

USAF should also consider EPA's Region 6 Human Health Media-Specific Screening Levels in the comparison to the soil analytical results and background concentrations.

CHAPTER 5.0 - RISK EVALUATION

F. Section 5.1.5 - Development of Action Levels, Page 5-6:

USAF's Draft SC Report

USAF provided Table 5-3 (Action Levels for COPC at the RV Fam Camp Area) which lists the MSCs applicable to the RV Fam Camp.

EPA's Comments

USAF modified the residential MSCs to generate recreational and industrial soil scenarios by multiplying the values by a factor to account for the lower exposure frequency. This modification may be reasonable for noncarcinogens but is not recommended for carcinogens since the non-threshold assumption for estimating carcinogenic risk does not allow for the modification based on exposure frequency.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE