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LETTER REGARDING REGULATORY REVIEW AND COMMENT ON WEAPONS STORAGE
AREA BACKGROUND STUDY NAS FORT WORTH TX
10/17/1997
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 342

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



File: 17A-39
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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

October 17, 1997

CERTIFIED MAIL

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

Re: Subsurface Hydrocarbon Contamination at the Carswell AFB - Naval Air Station Fort Worth Joint Reserve Base (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 Final Remedial Action Plan for the Risk Based Remediation of Site ST14 report submitted on September 22, 1997. After careful review of all the data provided and pursuant to Title 30, Texas Administrative Code (TAC), Section 334.78 - 334.81, this Office reiterates the November 4, 1996 concurrence of your proposed corrective action plan (CAP). Revisions made to account for a combined remedy (Bioventing, biosparging & natural attenuation) at this site are acceptable to this Office. However, there are still some concerns that should be addressed in order to further address the contamination at this site. Therefore, the following comments are noted:

1. The Site SD13 (the area east of Roger Drive) should be addressed by the TNRCC/IHW Office under Title 30 TAC Chapter 335 unless sampling results subsequently show fuel-related contaminants of concern. Consequently, the proposed remedial action plan does not apply to Site SD13.
2. This Office has adjusted target concentrations for the construction worker exposure scenario to account for time-averaged exposure. Please review the TNRCC August 12, 1997 memorandum entitled *Adjustment to March 6, 1997 Protective Concentrations in Groundwater for Construction Worker Exposure to Account for Time-Averaged Exposure* to ensure that no substantive change to the Plan B evaluation is warranted.
3. This Office concurs with the proposed operation, monitoring and system performance (OMP) of the remedial system. However, monitoring results and performance evaluation of the system must be submitted in an OMP report (TNRCC-0696) instead of a Field Activity Report (FAR) as stated in the CAP document.

4. Please continue to monitor for the presence of NAPL in monitor well ST14-MW17. If present, increase product recovery frequency by performing manual bailing during monitoring activities of the remedial system.
5. In reference to the groundwater sampling program, reduced sampling frequency is recommended for wells showing contaminants below MCL or BDL.

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 may be rejected.

A written response to this letter that adequately addresses the completion of the aforementioned items should be submitted to this Office within sixty (60) 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.**

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

Sincerely,



Antonio Peña, P.E.
Coordinator, Team II
Responsible Party Remediation Section
Petroleum Storage Tank Division

ARP/keh
104819.cap

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)
Mark Weegar, TNRCC Industrial and Hazardous Waste Division
Sam Barrett, TNRCC Region 4 Field Office
(1101 East Arkansas Lane, Arlington, Texas 76010-6499)

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