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LETTER REGARDING U S EPA REGION VI COMMENTS ON DRAFT RCRA FACILITY
INVESTIGATION REPORT FOR SOLID WASTE MANAGEMENT UNITS 22, 23, 24 AND 25
NAS FORT WORTH TX
3/2/1998
U S EPA REGION VI



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 420



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

1998 MAR -4 AM 10:14

March 2, 1998

Mr. Mark A. Weegar, Project Coordinator
Federal Facilities Team
Corrective Action Section
Pollution Control Division, MC-127
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Weegar:

The Environmental Protection Agency (EPA) has reviewed the document, "Draft RCRA Facility Investigation Report, SWMU 22, 23, 24 and 25, Carswell Air Force Base, Texas, December 1997". This report was received by EPA on January 26, 1998.

Based on this review, EPA offers the following comments:

1. **Page E-6, 2.4 INVESTIGATION REMEDIATION REPORT.** SWMU 24 Information presented here and in the RFI Workplan dated January 1997 does not indicate how much soil was removed during the removal of the drums. Was soil removed to Limestone or shale? TCE has a tendency to move vertical with little horizontal movement, unless samples are collected in the release area there is a possibility contamination can be missed. Samples should have been collected the full depth of borings. Has any investigation been conducted to determine if there are Dense Nonaqueous Phase Liquids (DNPL) present and do they exist down gradient?
2. The impact of current or past releases from the landfills and the waste pit on the TCE plume is not fully described. Also, there is no information provided to show how the current pump and treat system fits into the cleanup or containment of the TCE plume.
3. **Page 2-5, 2.1.5.1 SWMU 22.** The location of THGKRTA008 was changed from that noted in the Workplan. Since the locations were based upon aerial photographs the movement of this sample location does not appear to be justified. You also describe a visually impacted soil at the test pit location. Based upon the information provided here and in

- 4-211
- Appendix D, you did not collect a sample from the fuel saturated soil and you did not complete the trench through the area with the most likely contaminated soil. The sampling at this location does not appear to delineate the contamination.
4. **Page 2-5, 2.1.5.2 SWMU 23.** It would be helpful to have the aerial photographs to review.
 5. **Page 3-15, 3.3 GEOPHYSICAL SURVEY CONCLUSIONS.** The isolated anomaly, located at (220, 480) on the survey grid, was not investigated. One reasons presented is based upon this being the location of a sanitary sewer. However, you do not show a sewer on Figure 3.22 in this area. Have aerial photographs been reviewed for this area?
 6. **Figures 3.7 to 3.12.** There should be more recent water level measurements than the June 18, 1990 data indicated in these cross-sections. The contour maps shown in Figures 3.15 and 3.16 indicate they are based upon 1997 data. There does not appear to be enough data for you to accurately draw water level contours. The water level contours from January 1997 indicate a high just east of the landfills that is not present in July.
 7. **Page 4-6, 4.2.2.1 Surface Soil.** The lead result of 20,000 mg/kg is J flagged. The Data Validation Summary Report does not indicate that any qualifiers were added to lead results, please clarify.
 8. **Page 4-12, 4.5.3 Discussion of Groundwater Impacts.** I agree that "the extent of TCE contamination is not fully characterized in the east direction." However, the extent of TCE contamination to the north and southeast has also not been fully delineated at this time. Monitoring well MW-IT-01T has a TCE concentration of 0.0681 mg/l and this well is very near the property boundary for the facility. This indicates a need to move off base and determine the full extent of the groundwater contamination. In addition, monitoring well WHGLTA003-01 has a TCE concentration of 0.450 mg/l and there are no wells to the north or southeast to delineate the plume in this area. The RFI does not indicate how you plan to address this lack of information. Also see comment number 6.
 9. **Page 4-12, 4.5.3 Discussion of Groundwater Impacts.** No samples immediately down gradient of the SWMUs were analyzed for metals. You describe leaded sludge as being disposed of in SWMU 24 and various other paints and solvents in other landfills. Please explain why metals were excluded.

10. **Figure 4.4, Soil Samples Exceeding Risk Reduction Standard 2 SWMU 24.** This figure indicates no exceedences for metals, SVOCs and VOCs for boring BHGLTA 004 and limited exceedences for boring BHGLTA 007. However the Analytical Data Sets on pages J-584 to J-589 and J-603 to J611 Appendix J, indicates multiple sets of analytical data and exceedences. There are no qualifiers on this data. Explain this data and indicate why it was not used.
11. **APPENDIX D, TEST PITS LOGS.** The logs indicate that groundwater was encountered in some of the trenches at SWMU 22 and SWMU 23. Medical waste is described as being present when groundwater entered the excavation. Since groundwater discharges into Farmers Branch Creek, this information must be included in any risk assessments done for these sites. In addition the Texas Department of Health should be contacted to ensure there are no concerns with the medical waste and possible groundwater contamination in drinking water wells.
12. **APPENDIX D, TEST PITS LOGS.** The logs indicate that samples were not collected from several pits due to medical waste or depth of waste, based upon this information it does not appear that you have delineated the extent of contamination in this area.
13. **APPENDIX D, BORING LOGS.** The logs do not indicate subsurface samples were collected from borings BHGLTA 004, 005, 006 and 007. Figure 4.4 indicates samples were collected from these borings, please clarify.
14. **APPENDIX D, BORING LOGS and Figure 4.4.** The boring logs indicate samples were collected from various depths with the highest PID reading. Please describe how this was done.
15. **APPENDIX F, TECHNICAL MEMORANDA, Technical Change No:3.** A monitoring well was dry and converted to a boring. Were any samples collected from this boring?
15. **APPENDIX G, WATER WELL SURVEY.** Is there any data on any of the wells that may be located close to the TCE plume to determine if they are impacted?
17. **APPENDIX J, ANALYTICAL DATA SET, pages J-287 to J-290.** Sample identification numbers (LF04-04WG01 and LF04-4BWG01) do not match any discussed in the report.
18. **Appendix J, ANALYTICAL DATA SET.** It appears that some samples were analyzed using two different methods for the

same parameters, see pages J-296 and J-408. Also see comment number 10 for additional information. Please explain.

Please contact me at (214) 665-8306 should you wish to discuss this further.

Sincerely,



Gary W. Miller
Senior Project Manager
Base Closure Team

cc: Mr. Rafael Vazquez
Air Force Base Conversion Agency
HQ AFBCA/DC

cc: ✓ Mr. Olen R. Long, (BEC/BTC)
Air Force Base Conversion Agency
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cc: Mr. Charles A. Rice
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