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LETTER REGARDING TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
DEFERRING TO U S EPA REGION VI COMMENTS ON DRAFT WORK PLAN ADDENDA FOR  
UNNAMED STREAM AND GROUNDS MAINTENANCE YARD GOLF COURSE AND  
AEROSPACE MUSEUM NAS FORT WORTH TX

1/6/1999

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 446

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



File: 17A-72  
P.W. 446

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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

January 6, 1999

Mr. Rafael E. Vazquez  
Regional BRAC Environmental Coordinator  
AFBCA Regional Operating Location  
3711 Outlaw Country Drive  
Austin, TX 78719-2557

Re: Carswell Air Force Base (NAS Fort Worth)  
TNRCC Solid Waste Registration No. 65004  
Hazardous Waste Permit No. HW-50289  
EPA ID No. TX0571924042  
**Review of Draft Work Plan Addenda for the Unnamed Stream, Grounds  
Maintenance Yard, Golf Course Maintenance Yard and Aerospace Museum Site**

Dear Mr. Vasquez:

The Texas Natural Resource Conservation Commission (TNRCC) has completed our review of the *Draft Work Plan Addenda for the Risk-Based Assessment, Management, and Closure of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at Naval Air Station Fort Worth, Joint Reserve Base, Carswell AFB, TX*. All four (4) work plans were dated November 16, 1998 and all were received by the TNRCC on November 17, 1998. The draft work plans outline investigatory activities that will be conducted at the Unnamed Stream, Grounds Maintenance Yard, Golf Course Maintenance Yard and Aerospace Museum Site. In addition to the review of the referenced work plans, the TNRCC also evaluated comments received from EPA Region 6 dated November 25, 1998 (see Enclosure A). A copy of EPA's comments were forwarded to the Air Force Base Conversion Agency (AFBCA) by EPA Region 6.

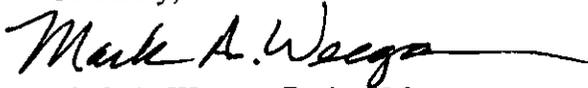
Based upon our review of the draft work plans, the TNRCC has no additional comments beyond those already provided to AFBCA by EPA Region 6. AFBCA should proceed with the implementation of the proposed field activities contingent upon modifications to the draft work plan addenda which address EPA's comments.

Mr. Vazquez  
Page2

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If you have any questions regarding this review, please call me at (512) 239-2360, Mail Code MC127, e-mail: [mweegar@tnrcc.state.tx.us](mailto:mweegar@tnrcc.state.tx.us).

Sincerely,



Mark A. Weegar, Project Manager  
Team II, Corrective Action Section  
Remediation Division

MW:mw

cc: Mr. Gary Miller, EPA Region 6 (6PD-NB)  
Mr. Charles Pringle, AFCEE/ERB - Brooks AFB, TX  
Mr. Tim Sewell, TNRCC Region 4 - Arlington



Attachment A

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

SWR # 6500  
CAS - 2197  
446 3

November 25, 1998

Mark Weegar  
Corrective Action Section  
Remediation Division  
Texas Natural Resource Conservation Commission  
P.O. Box 13087  
Austin, TX 78711-3087

RECEIVED  
DEC 01 1998  
REMEDIATION DIVISION  
Corrective Action Section

Dear Mr. Weegar:

The Environmental Protection Agency (EPA) has reviewed the following documents: "Draft Work Plan Addenda for the Risk-Based Assessment, Management, and Closure of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at Naval Air Station Fort Worth, Joint Reserve Base, Carswell AFB, TX." The work plans cover the Unnamed Stream, Grounds Maintenance Yard, Golf Course Maintenance Yard and Aerospace Museum Site. The following comments are provided for your information.

**UNNAMED STREAM**

- Page 3-1, 3.4 RISK ASSESSMENT** The discussion in this paragraph seems to indicate a risk assessment will be completed for the attainment of Risk Reduction Standard Number 2 (RRS2). For clarification the Risk Reduction Rules do not require a risk assessment to close a site under RRS2.
- Page 3-2, 3.6 FIELD INVESTIGATION TASKS, Excavation of French Underdrain** This indicates that sampling will not be conducted at the excavation unless soil staining is observed. Since this drain pipe is described as a metal pipe with holes drilled in the bottom, samples should be collected from just below the pipe to determine if a release could have occurred from the drain. These samples should be collected even if no soil staining is observed along the excavation.
- Page 3-3, 3.6.2 Sampling and Analysis** The description of the different Case examples does not appear to delineate vertical and horizontal extent to background or PQLs. If the intent is to delineate the extent of contamination above RRS2 for removal and assuming that the extent of contamination, to either background or PQL has been previously determined, then this method will be adequate. I am concerned that the extent of contamination may not have been determined, since some of the maximum concentrations were at the greatest sampling depth.

4. **Page 3-4, 3.6.2 Sampling and Analysis, For Type 1 Areas** The work plan proposes to collect eight surface soil samples and only analyze some of the samples if needed, this may impact holding times for the SVOCs samples. Also, in Table 3-1 it is not clear if you plan to collect samples for SVOC analysis, since one sample is shown for metals but nothing for SVOCs.
5. **TABLES and FIGURES** It is not clear from the tables at what depth the previous UN-xx samples were collected from. Since the Unnamed Stream has been excavated and relined with rock in some areas, I not sure why the surface samples need to be collected from these areas to determine extent for removal.
6. **GENERAL** My comments on this work plan have been based upon the following: I am assuming that nothing is currently draining to the Unnamed Stream, all OWS have been removed and the only OWS in the area drains to a sanitary sewer. Does the Grounds Maintenance Yard drain to this area? Based upon the close location of the two sites it would appear that surface drainage could occur through this area which would suggest the need to sample for pesticides and PCBs.

#### **GROUNDS MAINTENANCE YARD**

7. **Page 3-1, 3.4 RISK ASSESSMENT** The discussion in this paragraph seems to indicate a risk assessment will be completed for the attainment of Risk Reduction Standard Number 2 (RRS2). For clarification the Risk Reduction Rules do not require a risk assessment to close a site under RRS2.
8. **Page 3-3, 3.6.2 Sampling and Analysis** The description of the different Case examples does not appear to delineate vertical and horizontal extent to background or PQLs. If the intent is to delineate the extent of contamination above RRS2 for removal and assuming that the extent of contamination, to either background or PQL has been previously determined, then this method will be adequate. I am concerned that the extent of contamination may not have been determined, since previous sampling only collected surface samples.

#### **GOLF COURSE MAINTENANCE YARD**

9. **Page 3-1, 3.4 RISK ASSESSMENT** The discussion in this paragraph seems to indicate a risk assessment will be completed for the attainment of Risk Reduction Standard Number 2 (RRS2). For clarification the Risk Reduction Rules do not require a risk assessment to close a site under RRS2.
10. **Page 3-3, 3.6.2 Sampling and Analysis** The description of the different Case examples does not appear to delineate vertical and horizontal extent to background or PQLs. If the intent is to delineate the extent of contamination above RRS2 for removal and assuming that the extent of contamination, to either background or PQL has been previously determined, then this method will be adequate.

11. **Page 3-3, 3.6.2 Sampling and Analysis** At several of the locations soil removal has already occurred and clean soil was used for backfill. Samples should be collected to confirm that all of the contamination has been removed during the previous removal actions at this site. If only the surface samples are analyzed during this sampling, I would hope they are clean, since this was clean backfill. Based upon the procedure provided in this work plan, samples below this point would not be analyzed.
12. **Page 3-3, 3.6.2 Sampling and Analysis** Based upon the one nickel hit at 20.1 mg/kg and background at 19.76 mg/kg, I feel that this is a variance from background. No additional sampling for nickel would be required.

#### **AEROSPACE MUSEUM SITE**

13. **Page 3-1, 3.4 RISK ASSESSMENT** The discussion in this paragraph seems to indicate a risk assessment will be completed for the attainment of Risk Reduction Standard Number 2 (RRS2). For clarification the Risk Reduction Rules do not require a risk assessment to close a site under RRS2.
14. **TABLE 3-1** No sample is shown for SVOCs at OT3804SA.

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. Ray Risner  
Mr. Rafael Vazquez

**FINAL PAGE**

**ADMINISTRATIVE RECORD**

**FINAL PAGE**