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LETTER REGARDING FOCUSED FEASIBILITY STUDY AND INTERIM REMEDIAL ACTION
PLAN FOR TRICHLOROETHENE PLUME NAS FORT WORTH TX
3/19/1999
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 460

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*

File:
P.W. 17A-53

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

March 19, 1999

Mr. John D. Doepker
Remedial Project Manager
Environmental Restoration Division
Headquarters Aeronautical Systems Center (ASC)
ASC/EMR Building 8
1801 Tenth St. Suite 2
Wright-Patterson AFB, OH 45433-7626

Re: Air Force Plant # 4 - Focused Feasibility Study & Interim Remedial Action Plan
TCE Plume under Naval Air Station Fort Worth JRB/Carswell AFB (NAS Ft. Worth)
TNRCC Industrial Solid Waste Registration No. 65004
TNRCC Hazardous Waste Permit No. HW-50289
EPA ID No. TX0571924042

Dear Mr. Doepker:

The Texas Natural Resource Conservation Commission ("TNRCC") Corrective Action Section has received a copy of the Draft Focused Feasibility Study ("FFS") and Interim Remedial Action Work Plan, NAS Fort Worth JRB, Texas ("Carswell"), dated January 14, 1999. It is our understanding that the Work Plan was created to address the trichloroethylene ("TCE") groundwater plume which originated from Air Force Plant # 4 and has migrated under the Carswell facility, and may be off-site. Therefore, this document is primarily driven by the Air Force Plant # 4 Superfund Record of Decision ("ROD"), and the review of which is not directly subject to the authority(s) within the Corrective Action Section.

However, the TNRCC understands that ASC [and Joe Dunkle, Remediation Project Manager for the Defense Environmental Restoration Account ("DERA") portion of the Carswell facility] would like for the Corrective Action Section to review and comment on the Work Plan. In addition, Joe Dunkle has requested that the contaminated groundwater beneath the DERA portion be addressed by the ROD. Therefore, it seems most appropriate that the Corrective Action Section provides comments. Please note that the following comments are driven by the fact that the DERA and Base Realignment and Closure ("BRAC") portion of the Carswell facility are currently under a Resource Conservation and Recovery Act ("RCRA") permit and its Hazardous and Solid Waste Amendments ("HSWA") to RCRA of 1984 Corrective Action requirements. These requirements include the cleanup of the contaminated groundwater.

Mr. Doepker
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Please note that concerning Figures 1.2 and 3.2, the contaminant values are not illustrated at the well locations, and since the screened intervals of the wells are located at the top of the aquifer, the contours only represent the TCE concentration at the surface of the aquifer. Since TCE is classified as a dense non-aqueous phase liquid, it is considered appropriate to characterize the entire aquifer, identify the higher permeability zones within the aquifer, collect data on the elevation of the bottom of the aquifer, provide a series of cross-sections depicting the aquifer characteristics, and a structural contour map(s) on the bottom of the aquifer. Otherwise, extent determination, maximum contaminant levels, risk assessments, feasibility studies, remedial action plans, and meeting the ROD's MCL requirements may not be fully addressed.

If you have any questions please contact me at (512) 239-2333, mail code MC127, or via e-mail at risner@tnrcc.state.tx.us.

Sincerely,



Ray S. Risner, Sr. Project Manager
Corrective Action Section
Remediation Division

RSR/rsr

cc: Mr. Gary Miller, Federal Facilities, EPA Region 6 - Dallas (MC R04)
Mr. Rafael Casanova, Superfund, EPA Region 6 - Dallas
Mr. Joe Dunkle, AFCEE/ERD - Brooks
Mr. Rafael Vasquez, AFBCA/HQ - Bergstrom
Mr. Tim Sewell, TNRCC, Waste Program, Region 4 - Duncanville

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