

N83447.AR.000432
NAS FORT WORTH
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON WORK PLAN FOR
ADDITIONAL SITE ASSESSMENT AND INVESTIGATION OF AREA OF CONCERN 4 NAS
FORT WORTH TX
3/31/1999
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 602

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



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

March 31, 1999

Mr. Joseph R. Dunkle
 Remedial Program Manager
 Air Force Center for Environmental Excellence
 HQ AFCEE/ERD - Brooks AFB
 3207 North Road
 San Antonio, TX 78235

**CERTIFIED MAIL# P 196 642 634
 RETURN RECEIPT REQUESTED**

Re: Comments to the Workplan for Additional Site Assessment and Investigation of AOC 4 Area (Buildings #4150, 4152 & 4154), NAS Ft. Worth (formerly Carswell AFB), Ft. Worth (Tarrant County), Texas (LPST No.s 95220, 108711, 108712 & 108713 - Priority 4.1 - Facility ID # 009696)

Dear Mr. Dunkle:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed the above-referenced submittal. A list of the comments is enclosed. Please prepare a written response to each comment, referencing the assigned TNRCC LPST ID numbers, unless otherwise specifically requested in the enclosure. The information in the TNRCC reference line above should be included in your response.

A written response to these comments should be submitted to the appropriate TNRCC Regional Office and to the TNRCC Central Office at the letterhead address, using mail code number MC-137 [ARP]. Please submit your response on or before 45 days from receipt of this letter. Should you need additional information or wish to discuss these comments, please call me at (512) 239-2186. Thank you for your cooperation in this matter.

Sincerely,

Antonio R. Peña, P.E.
 Federal Facilities Coordinator
 Team IV, PST/Responsible Party Remediation Section
 Remediation Division

ARP/mel
 AOC4.inv

Enclosure: General Comments

cc: Sam Barrett, TNRCC Region 4 Field Office, 817/469-6750
 (1101 E. Arkansas Lane, Arlington, Texas 76010-6499)

ENCLOSURE

General Comments

- 1) The Workplan tends to rule out a Plan B risk Assessment consideration and/or evaluation which may produce SSTLs (Site-Specific Target Levels) greater than the Plan A evaluation. Please note that closure criteria under Plan A must be demonstrated via the Exit Flowcharts where it should be demonstrated that performance of a Plan B risk assessment would not be needed for the site. Furthermore, currently LPST sites can be closed with site concentrations exceeding target levels provided they meet all requirements of the exit criteria established in our February '97 memo entitled "*Process for Closure Evaluation for LPST Sites Exceeding Target Concentrations*".
- 2.) Plume stability is of paramount importance to the above closure decision making process. The LPST sites encompassing AOC 4 area lack updated groundwater sampling data to show this trend, making your closure assumption a bit premature. Referring to the Plan B evaluation, after enough representative data is collected, individual pathway analyses should be conducted in the AOC 4 area to determine the complete pathways, if any, and demonstrate whether a Plan B is required or not.
- 3) Results of the investigation/assessment and/or monitoring should conform to the TNRCC Form No. 0562.
- 4.) A demonstration must be made to show that the TCE plume is not affecting the LPST sites at AOC 4 area. A figure showing latest TCE concentration contours in the AOC 4 area would be helpful.
- 5.) Please be advised that it appears that the AOC 4 area may have a commingled plume with a substance (TCE) regulated as a hazardous waste under the Federal Solid Waste Disposal Act, Subtitle C, therefore, a determination will be made in the future as to which TNRCC jurisdiction apply, being the PST/RPR Section or the Corrective Action Section of the Remediation Division.

Specific Comments

- 1.) Page 1-13, Completion details of the 17 existing AOC 4 monitor wells should be provided in the workplan.
- 2.) Page 2-15, section 2.1.3.6, A USGS topographic map with water well locations should be provided.
- 3.) Page 2-34, Figure 2.16, Subsurface utilities, if any, should be located in this figure.
- 4) Page 3-14, Section 3.4.3, Previous assessment indicated the need for additional plume delineation in some sites. However, future determination will be delayed pending additional updated groundwater sampling data.
- 5.) Page 3-2, Section 3.2, Soil parameter determination should be included in the soil boring investigation. Additionally, please note that effective March 1997, TPH analyses should be conducted with the new TPH method 1005.

- 6.) Page 3-7, Table 3.3, Analyses for TCE and RCRA metals must be included in the sampling program. In reference to RNA parameters, the following Natural Attenuation information is to be included in reporting documents:
1. Site conditions.
 - a. Unusual field or site conditions
 - b. Weather
 2. How RNA parameters were collected
 - a. Bailing
 - b. Low purging (if applicable) and pump rate.
 3. When the RNA parameters were taken
 - a. Before purging
 - b. After purging
 - c. After purging letting the well stabilize.
 4. Tables showing results.
 5. Copy of the field notebook.
 6. Equipment type - manufacturer and date purchased.
 7. Acceptable measurement deviation range for the equipment.
 8. Calibration logs
 - a. Date the equipment was calibrated.
 - b. Time the equipment was calibrated
 9. Manufacturer instructions.
 10. Maintenance log of the equipment used in collecting RNA parameters.
 11. Calibration solutions.
- 7.) Page 5-5, Section 5.4, This section seems to contradict the workplan since no installation of monitor wells is proposed at any of the LPST sites other than confirmatory soil assessment. Please explain, as it may have been an oversight.
- 8.) Sections 4.0, 5.0 and 6.0 do not match the contents of the Workplan. Also, no mention of the QAPP Addendum and the H & S Plan are found here. Please revise.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE