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LETTER REGARDING U S AIR FORCE RESPONSE TO REGULATOR COMMENTS ON
DRAFT SITE INVESTIGATION WORK PLANS NAS FORT WORTH TX
5/14/1999
AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE

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NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 613



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE
BROOKS AIR FORCE BASE TEXAS

14 May, 1999

MEMORANDUM FOR ANTONIO PEÑA (TNRCC)

FROM: HQ AFCEE/ERD
3207 North Road
Brooks AFB, TX 78235

SUBJECT: Responses to TNRCC Comments on the Draft Site Investigation Work
Plans, Area of Concern 4
LPST sites 95220, 108711, 108712, 108713
Facility ID No. 009696
NAS Fort Worth JRB, Texas

Dear Mr. Peña,

As required by your letter dated March 31, 1999, submitted herein are the responses to TNRCC comments on the Draft Site Investigation Work Plans for Area of Concern 4 at NAS Fort Worth JRB. The Air Force's contractor conducted the field investigation activities outlined in the Draft Work Plans and AFCEE is currently reviewing the internal draft version of the Site Investigation Report. The Draft Site Investigation Report will be submitted to TNRCC for review and comment this summer. The Air Force has made every attempt to incorporate the changes requested by TNRCC into the Site Investigation Report.

Should you have any questions or comments, please contact me at (210) 536-5290.

Sincerely,


for Joseph R. Dunkle
Remedial Project Manager
NAS Fort Worth JRB

Enclosure

cc:
Michael Dodyk
AFCEE/ERD
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UNITEC
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Ray Risner
Texas Natural Resource Conservation Commission
Remediation Division (MC 127)
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**RESPONSES TO COMMENTS:
WORK PLAN FOR ADDITIONAL SITE ASSESSMENT AND
INVESTIGATION OF AREA OF CONCERN 4
NAS FORT WORTH JRB, TEXAS**

Responses to TNRCC's Comments

General Comments

Comment 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 the 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".*

Response **The Plan A Early Exit Criteria flowcharts have been evaluated for this site and will be presented in the Draft Site Investigation Report (SI) for AOC 4. Based on the initial evaluation of the Early Exit Criteria which will be provided in the Draft SI, a Plan B risk assessment is not recommended for AOC 4.**

Comment 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.*

Response **Four quarters of groundwater monitoring will be recommended in the Draft SI to provide evidence of plume stability at AOC 4. After a full year of groundwater data has been collected, an evaluation of the groundwater plume stability and exposure pathways will be made. Sampling results and discussions on groundwater conditions at AOC 4 will be included in the quarterly and annual reports of the Basewide Groundwater Sampling and Analysis Program. If plume stability can be demonstrated and completed exposure pathways are not identified, the Plan A Early Exit Criteria groundwater pathways will be evaluated again for completeness. If plume**

stability cannot be shown or completed exposure pathways are identified, either a continued groundwater monitoring program or performance of a Plan B risk assessment will be recommended.

Comment 3 *Results of the investigation/assessment and/or monitoring should conform to the TNRCC Form No. 0562.*

Response **The TNRCC Form No. 0562 has been completed and will be provided as Appendix A to the Draft SI report.**

Comment 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.*

Response **TCE has been detected in wells surrounding AOC 4 and a map showing the concentration contours will be provided in the Draft SI report. A discussion on the presence of TCE in the AOC 4 area will be included in the Draft SI report.**

Comment 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.*

Response **The unrelated basewide TCE plume is currently being addressed separately under the jurisdiction of the Remediation Division in the office of Waste Management of TNRCC. It would seem appropriate for the LPST's and associated contamination identified at AOC 4 to fall under the jurisdiction of the Responsible Party Remediation Section of the Petroleum Storage Tank Division of the TNRCC.**

Specific Comments

Comment 1 *Page 1-13, Completion details of the 17 existing AOC 4 monitor wells should be provided in the workplan.*

Response **Completion details for 14 of the 17 existing AOC-4 monitoring wells will be presented as an appendix to the Draft SI report. During a records search, completion details for monitoring wells GMI22-02M, MW-49, and HM-121 were unable to be located.**

Comment 2 *Page 2-15, Section 2.1.3.6, A USGS topographic map with water well locations should be provided.*

Response **A USGS topographic map with water well locations will be provided in the Draft SI report.**

Comment 3 *Page 2-34, Figure 2.16, Subsurface utilities, if any, should be located in this figure.*

Response **Subsurface utilities at AOC 4 will be illustrated in the Draft SI report.**

Comment 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.*

Response **Delineation of groundwater contamination was not the objective for the field sampling tasks. Groundwater contamination had been delineated during previous assessments. The objective of installing new monitoring wells was to investigate previously suspected areas of free product. Sampling of existing monitoring wells at AOC 4 was performed to verify the extent of previously delineated groundwater contamination.**

Comment 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.*

Response **The effective date for total petroleum hydrocarbon (TPH) analyses by TPH method 1005 was March 1998. Since the work plans for this project were prepared in August 1997 and field activities commenced in April 1998, TPH method 418.1 and modified method SW8015M-GRO and SW8015M-DRO were used for this investigation. Proposed groundwater monitoring will include the use of TPH method 1005.**

Comment 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.

Response TCE and RCRA metals were not included as analytes during the site investigation activities because they were not chemicals of concern for the BTEX source contamination. TCE and RCRA metals are being addressed for the AOC 4 area of the regional TCE plume as part of the RCRA Facilities Investigation for AOC 2 under the direction of Mr. Ray Risner, TNRCC. Therefore the proposed groundwater monitoring program will not include TCE and RCRA metals. However, the regional TCE plume and its effect on AOC 4 will be discussed in the AOC 4 Draft SI Report.

The above 11 items from Comment 6 will be incorporated in the Draft SI report with the exception of item 10. The information for the maintenance log in item 10 was not previously recorded and has not been included in the reporting for work performed during this SI.

Comment 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.*

Response Please refer to Page 3-7, Section 3.4 of the work plan (WP) which states that the proposed field tasks for the site investigation will include the installation and sampling of six Alluvial Terrace groundwater monitoring wells at AOC 4.

Comment 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.*

Response **Sections 4.0, 5.0, and 6.0 of the Field Sampling Plan (FSP) were designed to provide an outline of the field tasks which will be performed to support the WP.**

Page 1-3, Section 1.1 of the WP states the intention to use the Base-Wide Quality Assurance Project Plan (QAPP) written by CH2M Hill along with the QAPP Addendum written by HydroGeoLogic, to be used in this investigation.

Page 1-3, Section 1.1 of the WP states that the Site Health and Safety Plan will be followed during the investigation. Page 5-1, Section 5.0 of the FSP also states that all field work will be performed in accordance with the Site Health and Safety Plan.

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