

N83447.AR.000493
NAS FORT WORTH
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS OF DRAFT CLOSURE
FOR UNNAMED STREAM SITE NAS FORT WORTH TX
1/31/2000
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 508

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



508 1

File:
P.W. 17A-82

508

2000 FEB -6 PM 1:05

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

January 31, 2000

Mr. Rafael E. Vazquez
Regional BRAC Environmental Coordinator
AFBCA/ROL Bergstrom AFB
3711 Fighter Drive
Austin, TX. 78719-2557

RE: Carswell Air Force Base (AFB)
TNRCC SWR No. 65004, EPA ID. No. TX0571924042
Review of Draft Closure Report for Unnamed Stream Site
(AOC 14, SWMU 67 and lower portion of SWMU 64)
Approval - Risk Reduction Standard No. 1 - Soil

Dear Mr. Vazquez

The Texas Natural Resource Conservation Commission (TNRCC) has completed our review of the *Draft Closure Report for Unnamed Stream Site* (Final Report) dated September 1999 and received by the TNRCC on September 30, 1999. According to the Final Report, the closure of the Unnamed Stream Area addresses Solid Waste Management Unit (SWMU) 67 Former Oil/Water Separator, Area of Concern (AOC) 14 Unnamed Stream Drainage Channel, and the portion of SWMU 64 French Underdrain System located on Base Realignment and Closure (BRAC) property. In addition to our review of the Final Report, the TNRCC also reviewed comments received from EPA Region 6 dated November 4, 1999.

According to the Final Report, closure/remediation activities associated with the Unnamed Stream Site (SWMU 67, AOC 14, and a portion of SWMU 64) address soil contamination only. These closure/remediation activities have been completed in accordance with the TNRCC Risk Reduction Standard (RRS) No. 1, pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S. Groundwater contamination was not addressed by the Final Report because it is believed that this contamination is associated with up-gradient releases from the base fuel tank-farm (SWMU 68) and the abandoned base gas station (AOC 7). Any soil and groundwater contamination which can be linked to releases from the upper portion of SWMU 64, SWMU 68 and AOC 7 will be addressed via the Defense Environmental Restoration Program (DERA) and the closure/remediation of these sites will be documented via a separate submittal.

In order to attain RRS No. 1, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated from affected media (i.e., soil, surface water, groundwater, air) to naturally occurring background levels. Waste constituents which are not naturally occurring (such as organic chemicals) must be cleaned to the analytical method detection limits. EPA defines these limits as Practical Quantitation Limits - the minimum concentration of

Mr. Rafael E. Vazquez
January 31, 2000
Page 2

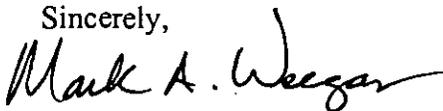
a substance that can be measured within specific limits of precision and accuracy under routine operating lab conditions. Based upon the information contained in the Final Report and other information available to staff, it appears that the closure/remediation of soil contamination associated with releases from the Unnamed Stream Site has achieved RRS No. 1.

As noted by EPA Region 6 in their letter of November 4, 1999, in addition to fuel related contaminants which appear to be migrating onto the site from up-gradient sources, monitoring wells located on Westworth Redevelopment Authority (WRA) property have in the past identified the presence of tetrachloroethene (PCE), trichloroethene (TCE) and cis-1,2-dichloroethene (cis, DCE). These contaminants are not fuel related volatile organic compounds (VOCs). It is possible that these VOCs are also related to up-gradient sources located on either NAS Fort Worth or Air Force Plant 4, however, the location of the wells on WRA property do not appear to correlate with the dimensions of known VOC groundwater plumes. The transfer of BRAC property associated with the location of the Unnamed Stream Site may not be possible until issues related to the source of the VOC groundwater contamination has been addressed.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual closure fails to comply with these requirements, the burden remains upon AFBCA to take any necessary and authorized action to correct such conditions. A TNRCC field inspector may review your Final Report and conduct a closure inspection of the site.

Questions concerning this letter should be directed to me at (512) 239-2360. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TNRCC Region 4 Office in Arlington. The TNRCC Solid Waste Registration Number and Unit Name should be referenced in all submittals.

Sincerely,



Mark A. Weegar, Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Natural Resource Conservation Commission

MW/mw

cc: Mr. Gary Miller, U.S. EPA Region VI, Dallas, TX.(6PD-NB)
Mr. Tim Sewell, TNRCC Region 4, Arlington, TX (MC-R4)

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE