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LETTER REGARDING REGULATORY REVIEW AND APPROVAL ON DRAFT CLOSURE
REPORT FOR OFFSITE WEAPONS STORAGE AREA NAS FORT WORTH TX
2/5/2001
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 668

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File:
P.W. 17A-78
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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 5, 2001

Mr. Charles Pringle
Team Chief/BEC
HQ-AFCEE/ERB
3207 North Road, B-532
Brooks AFB, TX 78235-5363

Re: Carswell Air Force Base
TNRCC Solid Waste Registration No. 65004
Hazardous Waste Permit No. HW-50289
Review of Draft Closure Report for Offsite Weapons Storage Area
Approval - Risk Reduction Standard No. 2

Dear Mr. Pringle:

The Texas Natural Resource Conservation Commission (TNRCC) has completed the review of the *Draft Closure Report for Offsite Weapons Storage Area NAS Fort Worth/Carswell Field* (Final Report) dated July 2000 and received by the TNRCC on July 25, 2000. The TNRCC also reviewed comments received from EPA Region 6 dated August 9, 2000. The Offsite Weapons Storage Area is identified as a 511 acre off-site parcel owned by United States Air Force and used primarily for the storage and maintenance of munitions, as well as, the disposal of ordnance and the limited storage of low-level radioactive waste. The referenced Final Report addresses the investigation and closure/remediation of the following sites:

- Areas A-1 and A-2 outdoor material storage and maintenance area;
- Area A-3 SWMU 59 Bldg. 8503 waste accumulation area and unpaved perimeter;
- Area A-5 disturbed surface area southwest of control fence;
- Explosive Ordnance Disposal (EOD) Range;
- Bunker floor drain outlets;
- Drainage ways DW-1, DW-2, DW-3, DW-4, DW-5, DW-6, DW-7, DW-8 and DW-9;
- Building 8500, 8503, and 8507 underground storage tanks (USTs);
- Areas beneath transformers; and
- Leach field

The closure of the Building 8505 and 8514 USTs and the Area A-4 Vehicle Fueling Area is being reviewed separately by the TNRCC's Petroleum Storage Tank Responsible Party Remediation Section

According to the Final Report, a number of sites were closed to 30 TAC §335.554 RRS No.1

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Closure/Remediation to Background. 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 a substance that can be measured within specific limits of precision and accuracy under routine operating lab conditions. According to the Final Report, the following sites have attained RRS No. 1:

- Areas A-1 and A-2 outdoor material storage and maintenance area;
- Area A-5 disturbed surface area southwest of control fence;
- Explosive Ordinance Disposal (EOD) Range;
- Building 8503 UST
- Drainage ways DW-1, DW-2, DW-4, DW-5, DW-6, DW-7, DW-8 and DW-9; and
- Areas beneath transformers

The Final Report also contains documentation indicating that a number of sites attained closure under 30 TAC §335.555 RRS No. 2 Closure/Remediation to Health-Based Standards and Criteria, such that no post-closure care or engineering or institutional control measures are required. According to the Final Report, the following sites have attained RRS No. 2:

- Area A-3 SWMU 59 Bldg. 8503 waste accumulation area and unpaved perimeter;
- Bunker floor drain outlets;
- Drainage way DW-3
- Building 8500 and 8507 USTs; and
- Leach field

Based upon the information contained in the Final Report and other information available to staff, it appears that the closure of the above listed sites have attained closure/remediation to RRS No. 1 and RRS No. 2, respectively.

Please note, however, as specified in §335.560 Post Closure Care and Deed Certification for Risk Reduction Standard No. 2, a person is required to place in the county deed records, a metes and bounds description of the portion or portions of the tract of land on which closure or remediation of industrial solid waste, municipal hazardous waste or contaminants was achieved. Our review of *Figure 6-1 Closure Boundaries* does not indicate that the sites closed under RRS No. 2 were broken out from the RRS No. 1 sites. Following conversations with representatives of the Air Force Base Conversion Agency (AFBCA), it was agreed by AFBCA that the entire area shown on Figure 6-1 would be closed under RRS No. 2 rather than re-survey the Weapons Storage Area to exclude RRS No. 1 sites. Based upon this agreement, the TNRCC's Corrective Action Section concurs with the closure of all sites at the Weapons Storage Area under RRS No. 2.

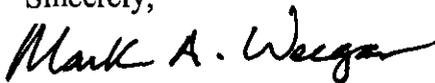
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As specified in §335.560, AFBCA must submit proof of deed certification to the TNRCC within ninety (90) days from the date of this letter. Upon acceptance of the proof of deed certification, the TNRCC will transmit a final letter releasing AFBCA from post-closure care responsibilities for the Weapons Storage Area.

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 or via e-mail: mweegar@tnrcc.state.tx.us. 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. Alvin Brown, AFBCA/ROL, Austin, TX
Mr. Gary Miller, U.S. EPA Region 6, Dallas, TX.(6PD-NB)
Mr. Tim Sewell, TNRCC Region 4 - Arlington (MC-R4)

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