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LETTER REGARDING PARTIAL APPROVAL OF FINAL RCRA FACILITY INVESTIGATION
FOR OIL WATER SEPARATORS NAS FORT WORTH TX
9/17/2001
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

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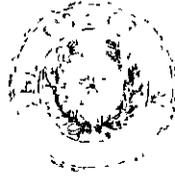


**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 600

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



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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

September 17, 2001

Mr. Michael Dodyk
Restoration Team Chief
HQ AFCEE/ERD
P.O. Box 27008
Fort Worth, TX 76127-0008

CERTIFIED MAIL #2363
RETURN RECEIPT REQUESTED

RE: Partial Approval of Final RCRA Facility Investigation (RFI) Report, dated April 2001
Approval for RRS 1 for Oil/Water Separators (O/WSs) in Bldgs. 1643, 3358 and 4146
Notice of Deficiency for RRS 2 for O/WSs in Bldgs. 1015, 1027, 1060, 1064, 1190, 1191,
1194, 1414, 1602 and 4210
NAS Fort Worth JRB, Carswell AFB, Texas
TNRCC Solid Waste Registration No. 65004
TNRCC Hazardous Waste Permit No. HW-50289
EPA ID No. TX0571924042

Dear Mr. Dodyk:

The Texas Natural Resource Conservation Commission (TNRCC) received your Final RFI Report for the O/WSs listed above, submitted by letter dated May 8, 2001. Based on the information provided, the TNRCC approves the investigation, conclusion and request for a No Further Action and a Risk Reduction Standard (RRS) No. 1 closure of O/WSs in Bldgs. 1643, 3358 and 4146 listed above [O/WS in Bldg. 1643 is solid waste management unit (SWMU) 40, and O/WSs in Bldgs. 3358 and 4146 are part of SWMU 66]. It appears that there is no compelling evidence of a release from either of these units; therefore, No Further Action status is warranted, and the units are hereby released from any further RFI requirements.

During the upcoming permit renewal, AFCEE may not exclude these units from the Corrective Action portion of the permit, but should include a status statement that the RFI has been completed and has been approved NFA. Please update your Notice of Registration (NOR) as appropriate. Any correspondence concerning the NOR should be mailed to the TNRCC Registration and Reporting Section at Mail Code MC-129.

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 any of these units fail to comply with these requirements, the burden remains upon AFCEE to take any necessary and authorized action to correct such conditions. A TNRCC field inspector may review your Report and conduct an inspection of the any of the units

Mr. Dodyk
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September 17, 2001

Also, based upon the information provided, the TNRCC can not, at this time, approve the RFI, conclusion or request for closure under RRS No. 2 for the remaining O/WSs in Bldgs. 1015 (SWMU 47), 1027 (SWMU 44), 1190 (SWMU 52), 1191 (SWMU 37), 1194 (SWMU 35), 1414 (SWMU 41), 1060 (AOC 11), 1064 (AOC 10), 4210 (AOC 12), and 1602 (part of SWMU 66). The text of the Report and especially the Conclusion portion of the text for each unit failed to identify a clear reason for selecting RRS 2 for that unit and which constituents of concern (COCs) were applicable. It appeared in most, if not all cases, that claims of extreme but true background and no clear pattern of contamination were used in the Conclusion argument. The TNRCC does not have a problem with a facility using these reasons to support a no release or RRS No. 1 position taken. Please revise the appropriate portions of the Report and clearly state your reasoning for the RRS 2 selection and for the appropriate COCs and media. Please revise maps appropriately as necessary. Finally, it appears from the data presented that groundwater samples collected from several of the units contain TCE or daughter products. The TNRCC is well aware of the TCE plume under the Carswell site; however, the latest TCE maps do not show that the locations of O/WSs in Bldgs 1064, 1191, 1194 and 4210 are above the identified plume (please see enclosed EPA comment letter dated May 21, 2001). Please explain and/or provide updated TCE plume maps for this revision and all other appropriate reports.

Please submit **an original and one copy** of an appropriately revised portion of the Report to the Corrective Action Section at Mail Code MC-127 within 90 days of the date of this letter with an additional copy submitted to the TNRCC Region 4 Office in Arlington. The TNRCC Solid Waste Registration Number, TNRCC Hazardous Waste Permit Number, EPA ID Number, and appropriate SWMU Nos. or O/WS Bldg. Nos. should be referenced in all submittals. Questions concerning this letter should be directed to me at (512) 239-2333.

Sincerely,


Ray S. Risner, Senior Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Natural Resource Conservation Commission

RSR/rsr

cc: Mr. Don Ficklen, Remedial Program Manager, HQ AFCEE/ERD
3207 North Road, Brooks AFB, TX 78235
Mr. Gary W. Miller, Federal Facility Team, EPA Region VI Office - Dallas
Waste Program Manager, TNRCC Region 4 Office - Arlington

Enclosure

ENCLOSURE 1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAY 21 2001

Ray Risner
Corrective Action Section
Remediation Division, MC-127
Texas Natural Resource Conservation Commission
P. O. Box 13087
Austin, TX 78711-3087

RECEIVED
MAY 5 2001
REMEDIAL ACTION DIVISION
CORRECTIVE ACTION SECTION

Dear Mr. Risner:

I have completed a review of the following document, "Final RCRA Facility Investigation Report For Buildings 1015, 1027, 1060, 1064, 1190, 1191, 1194, 1414, 1602, 1643, 3358, 4146, and 4210, NAS Fort Worth JRB, Texas." The following comment is provided:

Section 9, Page 19 of 25 - The report indicates the detection of Cis-1,2-DCE (0.00069 mg/L) and vinyl chloride (0.0022 mg/L) in the groundwater sample from WITCA031 are related to the Air Force Plant 4 TCE groundwater plume. However, the plume map received during the last BCT meeting, dated May 7, 2001 does not indicate the plume is close to this area. Additional monitoring wells were installed, but only sampled for arsenic, barium and manganese. Additional investigation of the potential groundwater contamination should be completed.

Please contact me at (214)665-8306 should you wish to discuss this further.

Sincerely,

Gary W. Miller, P.E.
Senior Project Manager
Base Closure Team

cc: Mark Weegar, TNRCC

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ADMINISTRATIVE RECORD

FINAL PAGE