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LETTER REGARDING U S EPA REGION VI REVIEW AND COMMENTS ON FINDING OF
SUITABILITY TO TRANSFER AND SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY
FOR OFFSITE WEAPONS STORAGE AREA NAS FORT WORTH TX

4/5/2002

U S EPA REGION VI



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 726



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

File: 17-I-4
D.E. 34-C 726
726 1

APR 05 2002

Mr. Charles C. Pringle, P.E.
BRAC Environmental Coordinator
HQAFCEE/ERB
3207 North Road, Bldg. 532
Brooks AFB, TX 78235-5344

Dear Mr. Pringle:

The Environmental Protection Agency (EPA) has reviewed the draft "Finding of Suitability to Transfer (FOST) and Supplemental Environmental Baseline Survey (SEBS) Documents, for the Offsite Weapons Storage Area, Carswell Air Force Base, Texas." The documents were received on February 20, 2002. The Air Force Base Conversion Agency (AFBCA) proposes the transfer of this site through a public sale to be conducted by the General Services Administration. The anticipated use of this property is unknown. However, the surrounding area is residential, light industrial and agricultural. This transfer is for approximately 247 acres and includes several buildings and other improvements. Based upon this review, we offer the following comments:

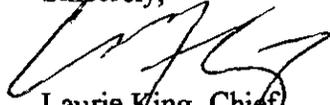
1. This property includes three Solid Waste Management Units (SWMUs) 59, 60 and 65. Although these SWMUs are closed to Risk Reduction Standard No. 2, they were listed in either the original Permit dated February 7, 1991, or in the March 2, 1995, letter from the Texas Natural Resource Conservation Commission (TNRCC). The Offsite Weapons Storage Area (WSA) is described in Tract G-700 and is included as Attachment B in the 1991, Permit. For the property to be transferred, the AFBCA needs to complete the modification of the Permit to note the completion of work on the SWMUs and to change the property descriptions in the Permit to remove reference to the WSA.
2. Section 5.4 of the draft FOST discusses the clearance of the Explosive Ordnance Disposal (EOD) Range. The EOD range was cleared for use as livestock grazing and other uses for which soil will not be disturbed below a depth of 5 to 1 foot. The FOST contains no other documents describing how such a restriction will be enforced. Similarly, the AFBCA has provided no information on deed restrictions to prevent incompatible uses of the property. The following (or sufficiently similar) language, part of which is taken from the Certificate of Clearance, should be included in the deed conveying the former EOD property "All present and/or future users, owners and inhabitants of this land are hereby advised that the possibility does exist that some explosive ordnance may still be located on this land, due to surface distortion, erosion by weather and the fact present technology does not permit a guarantee of complete removal. Therefore, digging, excavating, or otherwise disturbing soil below a depth of .5 feet is prohibited without the prior written

permission of the United States Air Force.” The Environmental Factors Considered table in Attachment 2 to the FOST should also show that a deed restriction is required.

3. Section 5.5 Asbestos Containing Material (ACM). The FOST indicates ACM “is in fair condition and not noticeably damaged or deteriorated to the extent that it creates a potential source or airborne fibers ” A tour of the buildings during the removal of contaminated soil indicated the asbestos pipe insulation had fallen off and was laying on the floor in the Electric Power Station, Building 8505. This would create a potential source of airborne fibers. In fact, the Supplemental Environmental Baseline Survey indicated that five (5) buildings have “friable thermal system insulation” (TSI). (SEBS § 3.3.1, p.11). Has a removal of the friable ACM taken place?
4. Under Deed Restrictions and Notifications a section should be added to state that all the underground storage tanks (USTs) were removed from the site. (FOST § 5).
5. The approval for the Draft Closure Report for the Offsite WSA indicates the Building 8505 and 8514 USTs and the Area A-4 Vehicle Fueling Area is being reviewed separately by the TNRCC Petroleum Storage Tank Responsible Party Remediation Section. These approvals need to be included in the FOST documentation, and are prerequisites to EPA’s approval of the Final FOST.
6. In the Deed Restrictions and Notifications portion of the FOST, a section should be added to state that water wells are located on the property. The results of the sampling of these water wells should be presented in the FOST. The results indicate that naturally occurring radio-nuclides were present in the groundwater above drinking water standards
7. The TNRCC closure letter attached to the draft FOST indicates that closure to RRS No. 2 requires deed certification (citing 30 TAC § 335.560) Since the AFBCA Closure Report does not distinguish between the portions of property closed to RRS No. 1 and the portions closed to RRS No. 2, all 247 acres of the WSA is considered to have been closed to RRS No. 2. (FOST Attachment 4). Yet, the AFBCA deed certification only relates to 87.327 of the total 247 acres. This would not appear to meet TNRCC’s conditions of closure. To resolve this issue, the AFBCA should either file a deed certification for the entire parcel, or perform a metes and bounds survey to support a delineation of that portion of the property closed to RRS No. 1 from that portion closed under RRS No. 2.
8. The draft FOST (FOST § 5.6, p.4) and Lead-Based Paint Sample Summary indicate that a substantial percentage of the facilities on the WSA (19 of 24) contain Lead Based Paint (LBP) in excess of EPA/HUD guidelines (5,000 ppm), and that the majority of the paint was found to be in poor condition. (SEBS, Attachment 4, p. 3-36). Although the draft FOST indicates the future reuse of the property is unknown, the property will not be suitable for residential use under such conditions. (FOST § 1, p.1). The AFBCA will need to include specific language in any transfer deed notifying successors in interest of the presence and risks of LBP, and precluding occupancy for residential purposes prior to successful remediation of the LBP.

If you have any questions, please contact Mr Gary Miller of my staff at (214) 665-8306.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurie King', written over the printed name.

Laurie King, Chief
New Mexico/Federal Facilities
Section

cc: Mr. Mark Weegar, Project Coordinator, TNRCC
Mr. Jim Waldron, AFBCA/DC

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ADMINISTRATIVE RECORD

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