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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FINAL BASEWIDE
GROUNDWATER SAMPLING AND ANALYSIS PROGRAMS NAS FORT WORTH TX
5/8/2002
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 728

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 8, 2002

Mr. Don Ficklen
Restoration Team Chief
Air Force Center for Environmental Excellence (AFCEE)
3207 Sidney Brooks Road, B-532
Brooks AFB, TX 78235-5344

Re: *Comments to Final Basewide Groundwater Sampling and Analysis Program, 2000 Annual Report*, dated March 2000, and to *Final Basewide Groundwater Sampling and Analysis Program, April 2001 Semi-Annual Report*, dated September 2001
Naval Air Station Fort Worth JRB/Carswell AFB (NAS Ft. Worth)
TNRCC Industrial Solid Waste Registration No. 65004
TNRCC Hazardous Waste Permit No. HW-50289
EPA ID No. TX0571924042

Dear Mr. Ficklen:

The Texas Natural Resource Conservation Commission's (TNRCC) contractor, Texas Engineering Experiment Station's Corrective Action Technical Support Program (a.k.a., Texas Center for Applied Technology, TCAT) has reviewed the above referenced documents, submitted to the TNRCC Corrective Action Section. The lists of comments for these documents are provided by the Corrective Active Section for your information. Please perform any additional work necessary for continuation or completion of these projects. Carswell does not need to prepare a written response for the Corrective Action Section.

An original and two copies of any documentation, must be submitted to the TNRCC, at the letterhead address using mail code number MC-127. An additional copy should be submitted to the Waste Program Manager, TNRCC, Region 4 Office, 1101 East Arkansas Lane, Arlington, TX 76010-6499, and to Mr. Gary Miller, EPA, Region 6, Dallas, Tx. Should you need additional information concerning ENCLOSURE 1 or 2, or wish to discuss these comments, please call me at (512) 239-2333.

Sincerely,

A handwritten signature in cursive script that reads "Ray S. Risner".

Ray S. Risner, Senior Project Manager
Team II, Corrective Action Section
Remediation Division

RSR/rsr

cc: Mr. Mike Dodyk, AFCEE/ERD - Carswell, Ft. Worth
Mr. Charles Pringle, 3207 Sidney Brooks Rd., B-532, Brooks AFB, TX 78235-5344
Mr. Gary Miller, EPA Region 6, Dallas, TX (MC R04)
Waste Program Manager, TNRCC Region 4 Office, Arlington

Enclosure(s). ENCLOSURE 1 - TCAT Comments on 2000 Annual Report
ENCLOSURE 2 - TCAT Comments on 2001 Semi-Annual Report

**Final Basewide Groundwater Sampling and Analysis Program, 2000 Annual Report, NAS
Fort Worth JRB, Texas, March 2001**

REVIEW COMMENTS

The following comments were generated from a review of the *Final Basewide Groundwater Sampling and Analysis Program, 2000 Annual Report, NAS Fort Worth JRB, Texas*, prepared for the U.S. Air Force Center for Environmental Excellence by HydroGeologic, Inc. dated March 2001.

General Comments

1. The groundwater potentiometric maps have been modified from previous reports to conform to surface water elevations. This corrected potentiometric surface configuration will improve estimates of plume migration direction and velocity, and design of remedial actions.
2. Prior reports lacked a discussion of changes and trends in VOCs from prior sampling rounds. This omission has been corrected, and the resulting summary provides a much improved picture of the evolution of contaminant plumes at the base.
3. Several relatively small benzene hot spots are identified in Figure 5.6. Apparently these will be addressed in other site specific documents. Please include the conclusions from these site specific documents in future annual reports.
4. An additional well is recommended in the upper Paluxy within the TCE hot spot that includes Well WHGLPU001 to confirm low concentrations of TCE beneath the hot spot. See Specific Comment 2 below.

Specific Comments

1. Section 2.3.1 - Terrace Alluvium Deposits

This section notes that when drilling the wells into the upper Paluxy sands, the Goodland/Walnut formation was observed to be fractured and appeared to have higher hydraulic conductivities than the Paluxy. Many of the conclusions regarding migration of contaminants from the Terrace Alluvium to the Paluxy are based on the assumption that the Goodland/Walnut is a barrier. According to these observations, this assumption may be incorrect.

2. Figure 5.3 - Trichloroethene Concentrations, Terrace Alluvium, October 2000.

The one upper Paluxy well that shows a small amount of TCE (WHGLPU001) is located within a TCE hot spot in the Terrace Alluvium. Because the Goodland/Walnut was observed to have higher hydraulic conductivities than expected in this area, it is recommended that an additional upper Paluxy well be installed just southeast of HM-123 to confirm low concentrations of TCE in the upper Paluxy beneath the TCE hot spot

Final Basewide Groundwater Sampling and Analysis Program, April 2001 Semi-Annual Report, NAS Fort Worth JRB, Texas, September 2001

REVIEW COMMENTS

The following comments were generated from a review of the *Final Basewide Groundwater Sampling and Analysis Program, April 2001 Semi-Annual Report, NAS Fort Worth JRB, Texas*, prepared for the U.S. Air Force Center for Environmental Excellence by HydroGeologic, Inc. dated September 2001.

The following comments are reproduced from the review of the 2000 Annual Report:

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4. An additional well is recommended in the upper Paluxy within the TCE hot spot that includes Well WHGLPU001 to confirm low concentrations of TCE beneath the hot spot.

The following comment is specific to this Report:

Specific Comments

1. Section 2.3.2 - Goodland/Walnut Aquitard

An additional monitoring well was installed in the Goodland/Walnut aquitard. The report states that its purpose was to characterize the unit. Please include a discussion of the results of the drilling and how they affect the assumption that the Goodland/Walnut protects the Paluxy from contamination in the Terrace Alluvium.

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ADMINISTRATIVE RECORD

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