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NAS FORT WORTH
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LETTER REGARDING REGULATORY REVIEW AND APPROVAL OF FINAL RCRA FACILITY
INVESTIGATION SUMMARY ADDENDUM FOR BUILDINGS 1015, 1027, 1060, 4064, 1190,
1191, 1194, 1414, 1602 AND 4210 NAS FORT WORTH TX
8/16/2002
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 716

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

August 16, 2002

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

CERTIFIED MAIL #9514
RETURN RECEIPT REQUESTED

RE: Approval of *Final RCRA Facility Investigation Summary Addendum for Bldgs. 1015, 1027, 1060, 1064, 1190, 1191, 1194, 1414, 1602 and 4210*, dated April 9, 2002
Oil/Water Separators - Risk Reduction Standard (RRS) No. 2
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 RCRA Facility Investigation Summary Addendum* (RFI Summary Addendum) for the Oil/Water Separators (O/WSs) listed above, dated April 9, 2002. The RFI Summary Addendum indicates that RFI and remediation/closure activities have been completed, in accordance with the Hazardous Waste Permit and the TNRCC Risk Reduction Standard (RRS) No. 2 closure requirements, pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S.

In order to attain RRS No. 2, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health based standards and criteria. Contaminants allowed to remain in place in media of concern (i.e., soil, ground water, surface water, air) must not exceed the health based clean up levels as specified in 30 TAC §335.556.

The TNRCC has completed a review of the RFI Summary Addendum. It contains documentation indicating that investigation and/or cleanup of the soil at the O/WSs at Bldgs. 1015 (SWMU 47), 1027 (SWMU 44), 1160 (AOC 11), 1064 (AOC 10), 1190 (SWMU 52), 1191 (SWMU 37), 1194 (SWMU 35), 1414 (SWMU 41), 1602 (part of SWMU 66), and 4210 (AOC 12) are complete and have attained RRS No. 2 such that no post-closure care or engineering control measures are required. Based upon the information contained in the RFI Summary Addendum and other information available to staff, it appears that the RFI has been completed and cleanup has achieved RRS No. 2. However, the RFI Summary Addendum does not contain information that is proposed to fulfill the requirements of 30 TAC §335.560(b) relating to deed certification. Please submit draft deed certification language for each area as exemplified in 30 TAC § 335.59 Appendix III [include a map of the area(s) of soil to be deed certified] for approval by the TNRCC. Please note that while

Mr. Dodyk
Page 2
August 16, 2002

preparing the list of COCs for each area to be attached to the deed certification, it appears that lead should be included for Building 1027 O/WS and copper for Building 1194 and 1414 O/WSs. Once the draft language is submitted, the TNRCC will review it, and if approvable, direct AFCEE to proceed with public notice, followed by deed certification.

It appears from the new data presented that groundwater beneath O/WSs at Buildings 1191 and 1194 is contaminated with TCE which was released from Air Force Plant # 4. The TNRCC has previously agreed that this contaminated groundwater could be addressed through the Superfund Record of Decision document. Please ensure that all future maps show the Air force Plant #4 contaminated groundwater plume to be below these units.

During the upcoming permit renewal, AFCEE may not exclude these units from the Corrective Action portion of the permit, but could include a status statement that the RFIs have been completed and closures have been approved at RRS 2.

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.

Please submit **an original and one copy** of the draft deed language for each unit 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 Fort Worth. The TNRCC Solid Waste Registration Number, TNRCC Hazardous Waste Permit Number, EPA ID Number, and appropriate SWMU Nos. and 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 - Fort Worth

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE