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LETTER REGARDING U S EPA REGION VI REVIEW AND APPROVAL ON NO FURTHER  
ACTION ON DRAFT FINAL AFTER ACTION REPORT FOR OFFSITE WEAPONS STORAGE  
AREA EXPLOSIVE DISPOSAL RANGE NAS FORT WORTH TX

*2/9/2007*

U S EPA REGION VI



# CARSWELL AFB TEXAS

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number \_\_\_\_\_ 740

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6

1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

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FEB 09 2007

Kathryn M. Halvorson, Director  
AFRPA  
1700 N Moore Street Suite 2300  
Arlington, VA 22209-2802

Dear Ms. Halvorson:

The Environmental Protection Agency (EPA) Region 6 has completed its review of the Department of the Air Force's "*Final Operating Properly and Successfully Demonstration Report of the Trichloroethene Plume Impacting the BRAC Property at the Former Carswell Air Force Base, Texas*," of January 2007 (the "OPS Demonstration"). The golf course area located along White Settlement Road on the east side of the former Carswell AFB, Texas is the Base Realignment and Closure (BRAC) property that is the subject of the OPS Demonstration. More specifically, the OPS Demonstration is focused on the remediation of the trichloroethene (TCE) ground water plume that underlies the property. Based upon our evaluation of the OPS Demonstration, EPA Region 6 concludes that the remedial action addressing the TCE plume at the golf course area of the former Carswell AFB is operating properly and successfully.

The EPA Administrator's authority to evaluate whether a remedial action is operating properly and successfully under Section 120(h)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) has been delegated to the Regional EPA offices. Our approval of the OPS Demonstration is made without any independent investigation or verification of the information used to support the Air Force's demonstration. We expressly reserve all rights and authorities relating to information not contained in the OPS Demonstration, whether or not such information is known as of this date or discovered in the future. Further, our approval of the OPS Demonstration is solely for the purpose of allowing deeded transfer of property and does not imply that all of the cleanup actions are completed at the golf course area. The Air Force must continue to ensure that the remedy addressing the TCE plume is properly operated and maintained. This includes the institutional controls to prevent unacceptable exposure to the contaminated ground water until the remediation goals are achieved. Should the remedy fail to function as intended, the burden remains upon the Air Force to take any necessary and authorized action to correct any and all deficiencies. EPA's approval is also based upon the assumption that the remediation described in the OPS Demonstration will be formalized without significant deviation or delay in an Explanation of Significant Differences (ESD) to the Superfund Record of Decision (ROD) for Air Force Plant 4, Tarrant County, Texas.

EVALUATION OF THE  
FINAL OPERATING PROPERLY AND SUCCESSFULLY DEMONSTRATION  
FOR THE TRICHLOROETHENE PLUME IMPACTING THE BRAC PROPERTY FOR  
FORMER CARSWELL AIR FORCE BASE  
FORT WORTH, TEXAS

The Air Force submitted its Final Operating Properly and Successfully Demonstration Report, Trichloroethene Plume Impacting the Base Realignment and Closure Property (BRAC), Former Carswell Air Force Base, Texas to the Environmental Protection Agency ("EPA") Region 6 on January 25, 2007 (the OPS Demonstration). The report presents the demonstration that the remedial actions are operating properly and successfully. The OPS Demonstration is being made on the remedy to address the trichloroethene (TCE) ground water plume impacting Parcel G, the golf course area. The OPS Demonstration is being submitted as a precondition to the deed transfer of federally owned property as required in Section 120(h)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9620(h)(3).

Region 6's evaluation and approval of this demonstration will allow the proposed transfer of Parcel G, the golf course area, to the Westworth Redevelopment Authority, Westworth Village, Texas. Region 6's evaluation is based on *Guidance for Evaluation of Federal Agency Demonstrations that Remedial Actions are Operating Properly and Successfully Under CERCLA Section 120(h)(3)* issued by the Office of Solid Waste and Emergency Response, EPA, August 1996.

This evaluation by Region 6 applies only to the remediation for the TCE ground water plume as provided for by the Air Force Plant 4 Superfund Record of Decision of July 1996 and as modified by the Explanation of Significant Differences issued in draft form of August 2006. More specifically, this evaluation focuses on a portion of the Superfund site where the federal property boundary will change with the BRAC transfer. Region 6 has worked closely with both the Air Force and the Texas Commission on Environmental Quality ("TCEQ") to assure that appropriate response actions were considered, selected, and implemented.

The ground water resource at the golf course area that is impacted is a shallow unconfined aquifer 30 to 40 feet in depth composed of alluvial deposits overlying essentially impervious bedrock. The bedrock is limestone interbedded with clay shale. The shallow ground water discharges into Farmers Branch which flow eastward through the golf course area to its confluence with the West Fork of the Trinity River. The shallow ground water on the former Carswell AFB is not used for drinking water, but it is potentially a source of drinking water. The deeper aquifer in the vicinity of the golf course is not threatened due to the overlying aquitard about 30 feet thick composed of limestone interbedded with clay.

The TCE plume impacting the golf course area is the southern lobe of a larger plume that

sampling and provided Groundwater Monitoring Reports including the October 2005 groundwater findings prepared for the Five Year Review.

6. The Air Force has provided documentation in the OPS Demonstration that a long-term monitoring system is in place to monitor the future effectiveness of the ground water remediation.

In making its evaluation, Region 6 considered *the Final Operating Properly and Successfully Demonstration Report* of January 2007 and the major documents referenced therein. In addition, Region 6 also found that TCEQ had approved all of the work plans, reports, and remediation standards.

Region 6 made no independent investigation or verification of the information presented in the Air Force OPS Demonstration.

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**ADMINISTRATIVE RECORD**

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