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LETTER REGARDING REGULATORY 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
2/15/2007
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



CARSWELL AFB TEXAS

ADMINISTRATIVE RECORD COVER SHEET

AR File Number _____ 739

Kathleen Hartnett White, *Chairman*
 Larry R. Soward, *Commissioner*
 Martin A. Hubert, *Commissioner*
 Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 15, 2007

2007 FEB 20 AM 11 08

Ms. Norma Landez
 BRAC Environmental Coordinator
 AFRPA/DK
 143 Billy Mitchell, Suite 1
 San Antonio, TX 78226-1816

Re: Approval No Further Action - *Draft Final After Action Report Offsite Weapons Storage Area Explosive Ordnance Disposal Range Ordnance Removal/Clearance at the Former Carswell AFB, Texas September 2006*
 Former Carswell Air Force Base (AFB)
 TCEQ SWR No. 65004
 EPA ID No. TX2571724333
 TCEQ Hazardous Waste Permit No.

Dear Ms. Landez:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the referenced submittal (After Action Report) dated September 2006 and received by the TCEQ on October 18, 2006. In addition, the TCEQ also reviewed comments received from EPA Region 6 dated November 20, 2006. As you are aware, by letter dated September 14, 2001, the TCEQ approved the deed certification and release from post-closure care responsibilities for the Weapons Storage Area (WSA), including the Explosive Ordnance Disposal (EOD) Range. The deed certification for the WSA stated that contaminants remaining at the site had been remediated to meet residential soil criteria under Risk Reduction Standard (RRS) No. 2 pursuant to 30 Texas Administrative Code (TAC) 335 Subchapters A and S.

According to the After Action Report, this is the second removal/clearance of munitions and explosives of concern (MEC) conducted at the EOD Range. The first removal/clearance was conducted by EOD personnel from Hill AFB in 1995, and certified that the land was approved for livestock grazing or agricultural landuse. Because of the depth below land surface to which the EOD Range was cleared, the Department of Defense Explosives Safety Board (DDESB) recommended that if the property were to be used for any purpose other than livestock grazing where excavations below 0.5 to 1 foot in depth could occur, EOD personnel should be consulted.

The purpose of the removal/clearance that was conducted in 2006 and is the subject of the After Action Report, was to "locate, identify, remove and dispose of remaining material potentially presenting an explosive hazard (MPPEH), including MEC and UXO" so that the EOD Range could be certified for residential landuse. The After Action Report certifies that "all detectable explosive hazards, have been removed from the project site, and that the site is suitable for residential re-use".

12

Ms. Norma Landez
Page 2
February 15, 2007

Table 4-2 Soil Sample Analytical Results identified the results of soil verification samples collected following the excavation and removal of any MPPEH, including MEC and UXO, at the EOD Range. Based upon our review, all identified site-specific contaminants of concern (CoCs) are below the RRS No. 2 residential medium specific concentrations (MSCs), therefore, no further action is required concerning these CoCs. The TCEQ does have the following comment concerning the removal/clearance at the EOD Range:

- According to Appendix D Data Quality Objectives, Subsection D.2.1 MEC Detection, the maximum detection depth for a 20 millimeter (mm) projectile was 5 to 8 inches below grade, and 56 inches for a 105 mm projectile. According to Table 4-1 Recovered MPPEH Items, the majority of MPPEH found during the removal/clearance were 20 mm high explosive (HE) projectiles. Because it is reasonable to assume that residential reuse of the WSA, including the EOD Range could result in excavations below the depth certified (5 to 8 inches) in the After Action Report, the TCEQ requests that the landuse restrictions proposed in Section 6.0 of the After Action Report be modified to include a notice to future purchasers that the potential still exists to encounter MPPEH at depths below 5 to 8 inches. In a letter from EPA Region 6 dated April 5, 2002, concerning the Finding of Suitability to Transfer (FOST) the WSA, EPA requested the following language or similar language be included in the deed conveying the EOD Range: *"All present/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 distortions, erosion by weather and the fact that 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 prior written permission of the United States Air Force"*. It appears that this language or similar language is still appropriate for the EOD Range and should be included in the deed conveying the property.

Questions concerning this letter should be directed to me at (512) 239-2360. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Environmental Cleanup Section I at Mail Code MC-127. An additional copy should be submitted to the local TCEQ Region Office. The information in the reference block should be included in all submittals.

Sincerely,



Mark A. Weegar, P.G., Senior Project Manager
Team 1, Environmental Cleanup Section I
Remediation Division
Texas Commission of Environmental Quality

MW/mw

cc: Mr. Noel Bennett, USEPA Region 6, Dallas, TX (6PD-NB)
Waste Program Manager, TCEQ Region 4 Office, Dallas/Fort Worth

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE