

Response to Public Comment
Implementation Plan for Legacy Pollutants TMDLs in Dallas and Tarrant Counties
 July 30, 2001

Tracking Number	Date Recd.	Name & Affiliation of Commentor	Summary of Request or Comment	Summary of TNRCC Action or Explanation
001	06/20/01 (letter submitted at public hearing)	Judithanne P. Hare, Naval Air Systems Command, U.S. Department of the Navy	(a) The environmental baseline survey for NWIRP Dallas describes only one area of PCB remediation rather than two (page 10, paragraph 2).	(a) The baseline survey refers to several locations that include PCBs as a contaminant. Because of the complexity of the site and the ongoing nature of remediation activities, the implementation plan wording has been changed to indicate the remediation of PCBs in general, rather than a specific number of locations.
001			(b) Detection of pesticides at NASD is attributed to normal site-wide application and not a result of storage or spills (page 10, paragraph 3).	(b) Reports submitted by U.S. Navy consultants refer to container and drum storage areas as likely related to pesticide contamination. The implementation plan has been modified to clarify that corrective actions have been implemented, and that pesticide residues regardless of their origin do not appear to be a major problem at this facility.
001			(c) RCRA facility investigations at NWIRP and NASD began in 1993 and 1994 rather than 1998 (Page 15, Table 2 and page 16, third paragraph).	(c) The dates have been corrected.
001			(d) There is no evidence that USGS is performing sediment sampling or interpreting sediment data from Mountain Creek Lake for the TNRCC (page 21, second paragraph). Confirmation or clarification is requested.	(d) TNRCC and USGS have provided funding for a joint legacy pollutant investigation in several area water bodies. USGS previously collected core and surficial sediment samples in Mountain Creek Lake as part of earlier U.S. Navy projects. As part of the joint project with TNRCC, USGS will review and interpret the accumulated sediment data within the context of the legacy pollutant TMDL. No additional sediment sampling is planned in Mountain Creek Lake as part of this project. The project description has been clarified in the implementation plan.
001			(e) It may be pertinent to reference recent sampling conducted as part of a preliminary Superfund assessment for Mountain Creek Lake and SE 14 th Street.	(e) Reference to this activity has been added to the implementation plan.

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001			(f) NWIRP remediation efforts are addressing the discharge of contaminants to Mountain Creek Lake - a groundwater recovery and treatment system for VOC contamination began operating in 1996.	(f) The TMDLs and implementation plan are intended to address only those contaminants that resulted in the inclusion of Mountain Creek Lake on the state 303(d) list (legacy pollutants that have accumulated in fish tissue). Activities related to other contaminants have not been addressed in order to eliminate confusion, and because they are not pertinent to the TMDL.
001			(g) Soil contamination associated with the NASD crash/rescue boat dock was remediated in 2000. Remedial Action Completion reports will be submitted within the next month.	(g) Completion of the crash/rescue boat dock remediation in 2000 is indicated on page 10 of the implementation plan. Submittal of reports associated with the various remediation activities at both NASD and NWIRP are considered to be part of the ongoing RCRA-related efforts at these sites. Due to the complexity of these activities, and because they are being addressed through the agency's RCRA program, no attempt was made to generate a comprehensive list of all activities for inclusion in the implementation plan.
001			(h) Additional milestone time frames were presented for the NWIRP and NASD remediation efforts (expected completion of risk assessments and other reports).	(h) Submittal of reports associated with the various remediation activities at both NASD and NWIRP are considered to be part of the ongoing RCRA-related efforts at these sites. Due to the complexity of these activities, and because they are being addressed through the agency's RCRA program, no attempt was made to generate a comprehensive list of all activities for inclusion in the implementation plan.
001			(i) The letter notes the quarterly Restoration Advisory Board meetings that are held to provide information and obtain public input on activities at NASD and NWIRP.	(i) A reference to the existence of the Restoration Advisory Board has been added to the implementation plan.