

SECTION 3 CONCLUSIONS AND RECOMMENDATIONS

3.1 CONCLUSIONS

Closure confirmation soil sample results following excavation indicate that all contaminated soil and media exceeding TCEQ RRS1 criteria were effectively removed from the eastern disposal trench at SWMU B-3. As such, the land-based portion of the eastern trench is eligible for closure under RRS1. The excavated areas of the east trench were backfilled and the site was regraded. An estimated 696 cubic yards (916 tons) of hazardous waste/media was shipped to the Onyx Port Arthur facility for incineration, and an estimated 1,242 cubic yards of Class 1 and Class 2 nonhazardous waste was shipped to the Covell Gardens facility for disposal. The liner from the hazardous stockpile area was also disposed off-post as Class 2 nonhazardous waste. Metal debris was appropriately recycled.

Exploratory trenching in the western disposal area identified four trenches containing an estimated total in-place volume of 17,432 bank cubic yards for excavation, disposal, and backfill. In addition, waste characterization results from samples collected during the exploratory trenching indicate that D008 and D039/D040 hazardous waste may be present in the west trench.

3.2 EVALUATION OF DATA QUALITY OBJECTIVES ATTAINMENT

Data quality objectives (DQOs) for the SWMU B-3 IRA are provided in the *Data Quality Objectives for the Removal Action and a Technology Evaluation at Solid Waste Management Unit B-3* (USAF, 2002). As described in Section 1, the main objectives of the SWMU B-3 IRA are to 1) determine the extent of VOCs and metals above background in soil overlying bedrock, and 2) excavate contaminated soil to achieve closure in accordance with TCEQ requirements for RRS1 closure and to meet requirements of the 3008(h) Administrative Consent Order. A detailed list of DQOs for SWMU B-3, along with an evaluation of whether each DQO has been attained, is provided in Appendix C.

Closure confirmation sample data generated during the SWMU B-3 IRA activities were validated in accordance with the *Air Force Center of Environmental Excellence Quality Assurance Project Plan Version 3.1* and the project-specific WPs. The Data Quality Summary Report included in Appendix B presents the results of the validation effort. All data were considered useable to achieve the IRA data quality objectives.

3.3 RECOMMENDATIONS

Confirmation samples were collected in fall 2002 after all waste and impacted soil media had been removed to the bedrock contact from the east trench at SWMU B-3. All confirmation samples analyzed after excavation achieved clean closure criteria. Because the waste has been removed and all final confirmation samples collected were below the background concentrations for CSSA soils, closure of the soil portion east trench under RRS1 is recommended. The underlying bedrock and groundwater will be addressed by future remedial activities as part of the groundwater unit.

A second phase of IRA activities is recommended for the disposal trenches in the west area (sub-trenches A, B, C, and D). Soil and contaminated materials exceeding the TCEQ RRS1 criteria should be excavated and removed from the site and disposed as hazardous waste, or as Class 1 or Class 2 nonhazardous waste. After excavation is complete and all confirmation samples meet clean closure criteria, the area will be suitable for backfilling and regrading.