agency to both the Texas Water Commission (TWC) and the Texas Natural Resource Conservation Commission (TNRCC), initiated a preliminary site investigation on April 25, 1983, as requested by local officials acting on behalf of concerned citizens. On June 13 and June 23, 1983, additional investigations were conducted to characterize the type and extent of contamination. At least 50 drums of various pesticides and herbicides were observed and extensive soil staining was indicative of poor handling and transferring practices. An Immediate Removal Action was initiated by EPA on October 31, 1983. This action focused on removal of the most highly contaminated materials consisting of approximately 40 cubic yards of waste. Between 50-70 drums were mixed with lime and capped with clay and placed in two temporary disposal cells onsite. This removal action was structured to mitigate short term risks and scheduled to be incorporated into the permanent remedial action at a later date. Further followup inspections on December 15, 1983, February 14, 1984, and March 29, 1984 by the TWDR, EPA and Texas Air Control Board resulted in an additional removal action to further reduce shortterm risks posed by the site. In May 1984, an additional 19 drums were transported for disposal to an offsite permitted treatment, storage and disposal facility. A fence was constructed around the site to limit public access and warning signs were posted.

A Hazard Ranking System (HRS) package for Crystal City Airport was finalized in June 1984. The overall site score was 32.26. EPA and TWC (TNRCC), entered into a Cooperative Agreement (CA) on September 28, 1995 for a state-lead Remedial Investigation and Feasibility Study (RI/FS). The site was proposed for the NPL on October 5, 1985. The site was formally placed on the NPL on May 20, 1986. In June 1986, **TNRCC** contracted Ebasco Services Incorporated to perform the RI/FS. Phase I of the RI fieldwork lasted from September through October 1986; Phase II fieldwork was conducted during January and February 1987. The RI and FS reports were finalized in June and July 1987, respectively.

The Regional Administrator signed the Record of Decision (ROD) for the Crystal City Airport Superfund site on September 29, 1987, selecting onsite consolidation in a disposal cell with a cap meeting requirements of regulations promulgated under the Resource Conservation and Recovery Act (RCRA). This method was chosen to prevent spread of contaminants. EPA selected a remedy which eliminated the principal threat posed by site conditions by eliminating the possibility of human exposure to contaminants of concern.

The funds to conduct Remedial Design and Remedial Action (RD/RA) were awarded by EPA to the State of Texas on March 31, 1988 through a Cooperative Agreement with TWC (TNRCC). On June 14, 1988, TNRCC entered into a contract with Ebasco Services, the engineering firm which conducted the RI/FS, to perform Remedial Design work and prepare detailed construction plans and specifications for a bid package. The bid package was completed and an Invitation for Bids was issued on January 31, 1989. Eleven qualified bids were received, evaluated, and a contract was awarded to the lowest qualified bidder, Qualtec Incorporated. The contract was executed by TNRCC on April 21, 1989. Qualtec attempted to mobilize onsite in June 1989, but was denied entry by local officials. Due to defiance to repeated requests for access on behalf of Qualtec by both EPA and TNRCC, a Section 104 Unilateral Administrative Order under CERCLA authority was issued to Crystal City by EPA in November 1989, and TNRCC issued a Notice to Proceed to Qualtec on January 5, 1990. Qualtec began onsite mobilization on February 5, 1990. The following contract activities were conducted during the 120-day contract duration:

• construction of the consolidated cell,

• excavation and consolidation of contaminated material in the cell,

• verification monitoring,

• placement, compaction, grading, and seeding of clean backfill,

stormwater control,

• building decontamination, and asphalt floor removal,

• demolition of building B-3,

• recontruction of airport facilities to meet or exceed existing conditions including replacement of asphalt floor slabs with concrete and reconstruction of taxiways in contaminated areas,

• construction of the RCRA cap over the consolidation cell as specified by contract documents,

• continuous air monitoring and dust control,

 continuous health and safety and quality assurance/quality control operations,

• construction of a security fence around the consolidated cell.

Pre-final inspections were held on May 31, 1990 and June 6, 1990 to close out site work. The Certificate of Substantial Completion was issued July 3, 1990, signifying completion of all work except the vegetative topcover growth required by the contract specifications. The final work product acceptance occurred on September 25, 1990 after a joint TNRCC and EPA inspection reflecting the vegetative requirements had been met. The Remedial Action (RA) Report was finalized on May 23, 1991, and approved by the Region 6 Hazardous Waste Management Division Director on June 6, 1991.

In December 1991 a site Close Out Report was prepared in which EPA, in consultation with the State of Texas (TNRCC), determined all appropriate response actions required to ensure the protectiveness of human health and the environment at the Crystal City Airport had been implemented.

Pursuant to 40 CFR Section 300.510 of the NCP, the State (TNRCC) has assumed all responsibility for Operation and maintenance (O&M) at this site. TNRCC has implemented the EPA approved O&M plan requiring analysis of the city water well adjacent to the airport. In addition, air sampling for particulate arsenic and pesticides has been conducted. Since inception of the program in 1991, all samples taken to date are below the detection limits for all chemicals of concern.

The Agency for Toxic Substance and Disease Registry (ATSDR) issued a Site Review and Update (SRU) report for the CCA site on February 18, 1994. The SRU concluded "because contaminated soils and drums have been enclosed in the capped cell and other contaminated materials have been removed to an offsite hazardous waste landfill, the potential for exposure to on-site contaminants no longer exists." No further actions or evaluations were recommended.

Hazardous substances encapsulated in the cell on the site, however, are above health-based levels that do not allow for unlimited use of and unrestricted access to the consolidation cell area. Therefore, EPA will conduct a statutory five-year review, schedule for February 1995 (five years after the commencement of the RA), pursuant to OSWER Directive 9355.7–02, "Structure and Components of Five-Year Reviews."

Although the first five-year review has not been completed at the site, EPA believes it is appropriate to proceed with site deletion. Based on the successful encapsulation of hazardous substances in the consolidation cell, the results of O&M monitoring to date, and ATSDR's review, EPA has determined the remedy is protective and no further response action is necessary. This is consistent with current EPA policy as

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