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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 6, 2004

Mr. Gregory Lyssy
U.S. EPA Region 6
1445 Ross Ave., Suite 1200 (6PD-F)
Dallas, TX 75202-2733

Re: . Camp Stanley Storage Activity (CSSA), Boerne, TX;
TCEQ Solid Waste Registration No. 69026;
Off-Post Monitoring Report for December 2003

Dear Mr. Lyssy:

The Texas Commission on Environmental Quality (TCEQ) received the report entitled *Final December 2003 Off-Post Quarterly Groundwater Monitoring Report* on April 9, 2004. The report provided laboratory analytical results of groundwater collected from off-post drinking water wells during the December 1 to 4, 2003 sampling event. Samples of off-post groundwater drinking water wells were collected at Fair Oaks area, Hidden Springs Estates, I-10 area, Jackson Woods Subdivision, Leon Springs Villa area, Old Fredericksburg Road and Ralph Fair Road areas. The report specified that it fulfills the groundwater quarterly reporting requirements of CSSA's Data Quality Objectives.

The TCEQ has reviewed the report. The TCEQ also evaluated the letter from LTC Jason Shirley dated May 19, 2004 which provided additional details regarding the June 2003 Off-Post groundwater report. Our review indicates that CSSA has dealt with the on-going groundwater contamination by providing the affected drinking water wells users with Granulated Activated Carbon (GAC) systems to polish and remove organic contaminants. Pre and Post GAC laboratory analyses of the groundwater show the effectiveness of the system in removing organic contamination. The installation of GAC is, however, considered by the TCEQ as an interim measure designed to control or abate the immediate threat to human-health.

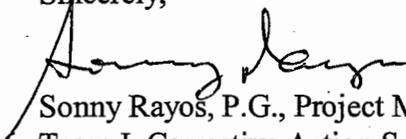
CSSA has, since September 2001, investigated the off-site groundwater contamination. Based on information submitted in the off-site and on-site groundwater reports, it appears that the lateral and vertical extent of groundwater contamination is defined. Using contamination concentration maps submitted with the May 19, 2004 letter, there are potentially four areas at CSSA which will require control of contaminant migration, these areas are: the Jackson Woods and Old Fredericksburg Road;

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Leon Springs and Hidden Springs Estates area; area near the RFR-3 well; and Camp Bullis area (groundwater contaminant transport appears to be associated with Salado Creek watershed.). Currently, there are no proposals, plans and/or long-term remedies or corrective actions to control the movement of groundwater contamination off-site, such as, groundwater recovery systems (potentially installed on or off-site), pump and treat systems, physical and chemical barriers, etc. The TCEQ is requesting the U.S. EPA, under its authority specified in the 3008(h) Order, to request and/or require CSSA to submit a Corrective Action Plan (CAP) for the long-term cleanup, remediation and control of groundwater contamination at the on and off-site locations.

Please call me at 512.239.2371 or email me at srayos@tceq.state.tx.us, at your convenience, if you wish to discuss or if you have any questions concerning this letter. Thank you for your cooperation in this matter.

Sincerely,



Sonny Rayos, P.G., Project Manager
Team I, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

cc: LTC Jason D. Shirley, Commander, Camp Stanley Storage Activity, 25800 Ralph Fair Road
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Mr. Brian Murphy, Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, TX
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Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX
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Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX