



DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, RRAD
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

January 10, 2003

U-027-03

Certified Mail

Mr. Kirk Coulter
Texas Commission on Environmental Quality
P.O. Box 13087 (MC-127)
Austin, TX 78711-3087

Reference: Removal of Coal Bins and B-14 Area, Camp Stanley Storage
Activity (CSSA), Solid Waste Registration Number 69026, EPA
Identification Number TX2210020739

Dear Mr. Coulter:

This letter respectfully serves as notification of the removal of the coal bin area and B-14 area from the CSSA Solid Waste Management Unit (SWMU) list. These areas were previously thought to be possible SWMUs and were included in the Environmental Assessment (EA)¹ SWMU list. In 1992 and 1993, Parsons identified many potential SWMUs through historical waste management records, site maps, aerial photographs, and interviews with CSSA personnel. In some cases, file data and interviews dealing with past waste handling practices were very speculative. All identified potential SWMUs were included in the EA, but a field survey following the SWMU identification process failed to identify any waste management activities at the coal bin area or the SWMU B-14 area. These field survey results for the coal bin area and the B-14 area were documented in the EA and were also presented in the CSSA RL17 Work Plan (Parsons ES, 1996). Further details associated with these areas are provided below.

COAL BIN AREA

The former coal bin area is located northwest of the headquarters building (Figure 1). The bins are concrete structures as shown in Photograph 1. This area was used for bulk coal storage, according to CSSA records. The structural integrity remained intact for the duration of its operation.

Aerial photos do not show waste management activities in 1957, 1962, 1966, 1973, or 1985, as shown in Figure 1. In addition, historical file records and interviews with present installation employees did not indicate historical waste management in this area. Field surveys completed in September 1992 and March 1996 did not indicate any evidence of waste management activity. Neither the bins nor the surrounding area show any evidence of waste management activities.

¹ ES, 1993. Environmental Assessment Camp Stanley Storage Activity, Engineering Science, Inc. September 1993.

B-14 AREA

The approximate location of the B-14 area is shown in Figure 2. A photograph of the area where the site may have been located is shown in Photograph 2. According to the EA, this area was supposedly a fired brass area located in the east pasture at CSSA. Fired brass areas are typically characterized by spent brass casings at the surface.

Aerial photos do not show waste management activities in 1957, 1962, 1966, 1973, or 1985, as shown in Figure 2. During the initial (1992) field survey, the reported B-14 area could not be located, even with the area cleared for fence repair operations. No spent casings were identified. No evidence of solid waste management activities was found in a subsequent field survey in 1996.

CONCLUSION

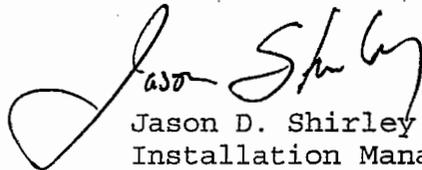
According to 30 Texas Administrative Code (TAC) 335.1, solid waste is defined as any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant or air pollution control facility, and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, municipal, commercial, mining, and agricultural operations, and from community and institutional activities.

The coal bin and B-14 areas, previously thought to be SWMUs, show no evidence of solid waste or solid waste management activity and have no records of solid waste management activity. Therefore, the areas do not require further investigation. Although both areas are listed as SWMUs in the EA and RL17 Work Plan, neither are considered SWMUs since field investigations found no evidence of past waste management activities at either area.

Also these sites do not appear on CSSA's NOR as SWMUs but are considered sites under the EPA RCRA §3008(h) Administrative Order on Consent and should be handled accordingly by the TCEQ. Although the coal bin area and the B-14 area have been listed as SWMUs in previous documents, this letter provides notification that they are not considered SWMUs and require no further investigation or remediation activities.

If you have any questions or comments, please me at (210) 295-7416. Thank you for your attention to this matter.

Sincerely,



Jason D. Shirley
Installation Manager

Enclosures

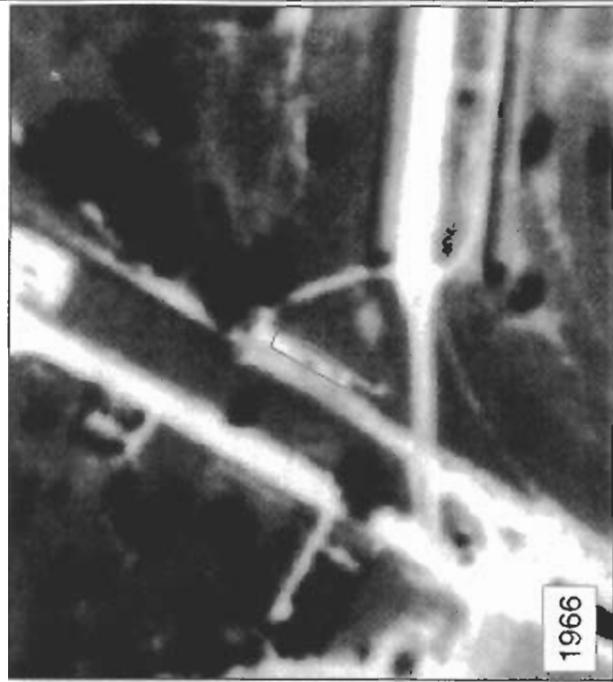
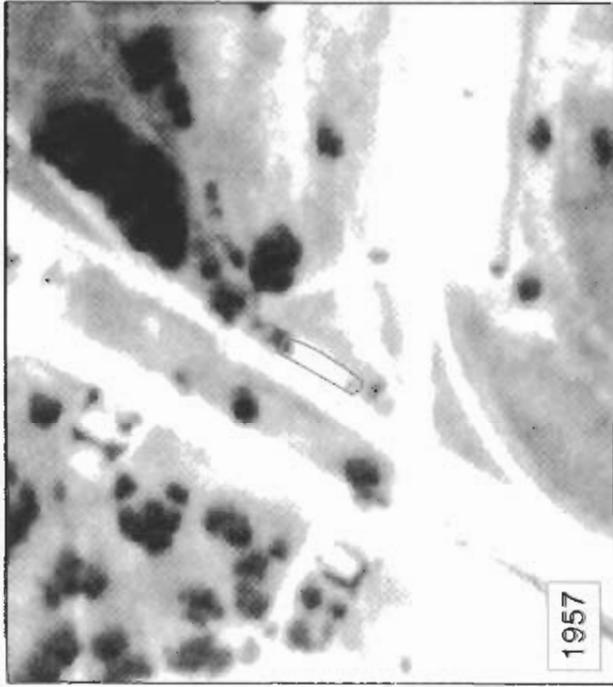
cc: Mr. Greg Lyssy (ltr)
EPA Region 6

Ms. Abigail Power (Ltr)
TCEQ Region 13

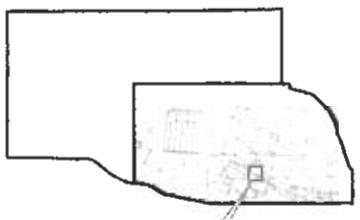
Mr. Kent Grubb (ltr)
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge
Advocate

Ms. Teri DuPriest (ltr)
Air Force Center for Environmental Excellence

Ms. Julie Burdey
Parsons - Austin



CSSA Reference Map

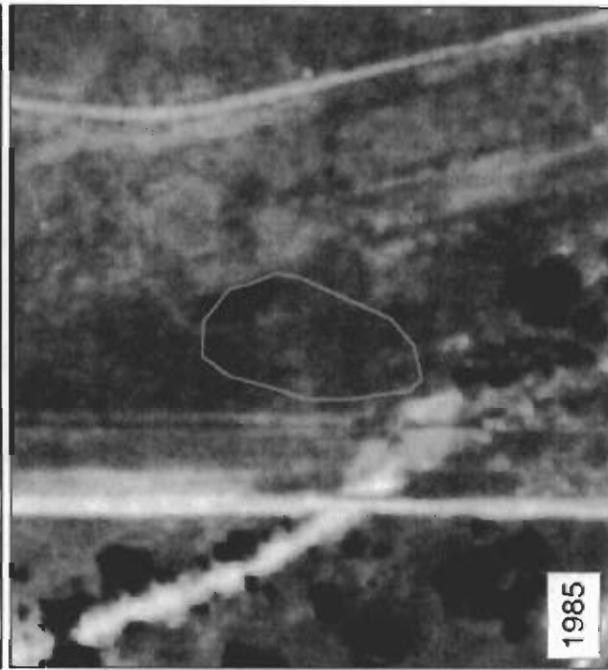
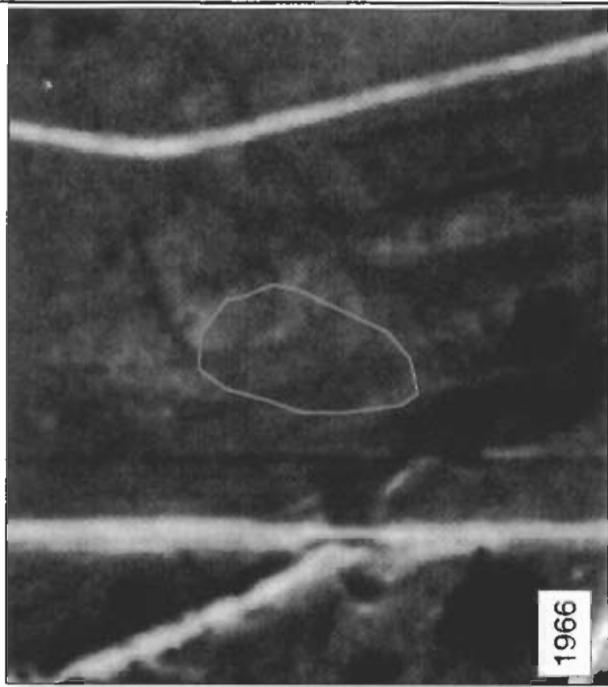
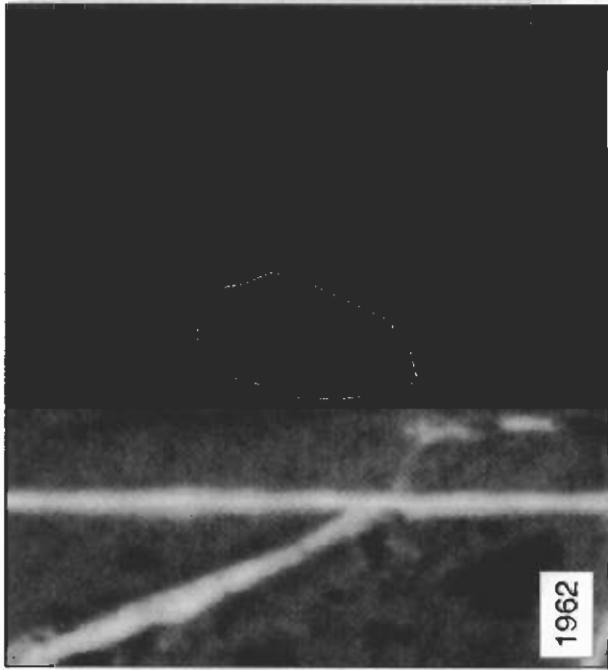


Coal Bin Area

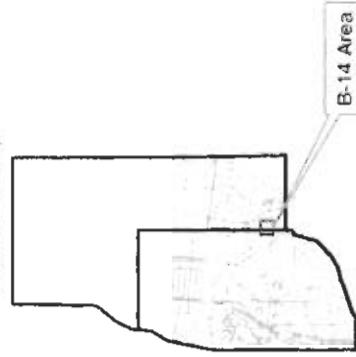


Figure 1
Coal Bin Area
Aerial Photographs
Camp Stanley Storage Activity





CSSA Reference Map



B-14 Area

Figure 2

B-14 Area

Aerial Photographs

Camp Stanley Storage Activity



150 75 0 150 Feet

Scalebar for Aerial Photographs



Photograph 1: Coal Bin concrete structures.



Photograph 2: Presumed location of SWMU B-14.