



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

13 May 2003

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Mr. Sonny Rayos
Texas Commission on Environmental Quality
Remediation Division
P.O. Box 13087
Austin, TX 78711-3087

Subject: Response to Texas Commission on Environmental Quality
(TCEQ) request for additional comments for SWMU B-32
closure under Risk Reduction Standards (RRS) No. 1, Camp
Stanley Storage Activity, Boerne, Texas

Dear Mr. Rayos:

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Material Command, U.S. Army, is providing this response to a TCEQ letter dated May 6, 2003 requesting additional information regarding CSSA SWMU B-32 closure.

The Background Metals Evaluation Report for CSSA was submitted to TCEQ in February 2002 and approved by TCEQ in April 2002. Prior to submitting the report to TCEQ, CSSA and Parsons met with Mr. Kirk Coulter and Mr. Peter Lodde to discuss the methodology to be used in the report. The report is included in Volume 2 of CSSA's Environmental Encyclopedia, which is accessible on the CD-ROM recently provided, and at http://www.stanley.army.mil/Volume%202/2002_bkgrnd/TOC_bkgrnd.htm. Due to the length of this report and the numerous occasions that it is referenced, it has not been provided with each closure or RFI report.

A total of 80 surface soil samples were collected at depths of less than 2 feet to provide the CSSA surface soil background levels. A total of 20 Glen Rose limestone samples were collected at depths ranging from 4.5 to 20 feet bgs for the Glen Rose background determination. Detailed information regarding the sampling methodology, statistics, and results are provided in the background report.

Although barium, cadmium, chromium, nickel, and zinc concentrations detected in limestone at SWMU B-32 slightly exceed the background levels calculated for the Glen Rose Limestone, they did not exceed the background concentration for these analytes in CSSA soils. As described in the report, soil boring logs indicate that interbedded clay layers were encountered in limestone in borings SB01 and SB03, and fill material was encountered to a depth of 7.5 feet in SB02. This clay and fill material likely has background concentrations more comparable to CSSA soils concentrations rather than the Glen Rose Limestone. Furthermore, though this may appear to be a "mismatched" comparison, in practical application, it is protective of human health

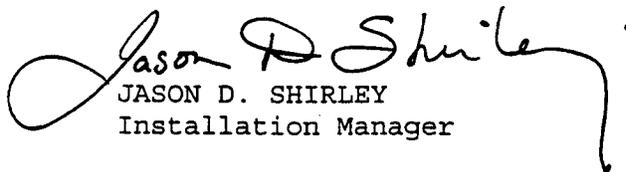
and the environment, cost effective, and reasonable and prudent. Metals concentrations in the overlying surface soil are naturally much higher than those in the underlying bedrock limestone. Therefore, remediating or removing small amounts of metals concentrations in the underlying limestone to meet the lower limestone background levels would provide no additional protection of human health or the environment because the naturally higher metals concentrations in the overlying surface soil would still be in place. It should also be pointed out that metals in alkaline limestone are less apt to leach than in the surface soil.

In a letter dated April 26, 1999, EPA determined that any original ITS analyses for any method, and any reprocessed data, do not comply with EPA quality requirements. EPA concluded that ITS data might be used for evaluation and screening, but ITS data would not be acceptable for clean up or compliance purposes. Based on EPA's memorandum, CSSA required its contractor, Parsons, to provide replacement data at their cost, and CSSA cannot now contractually request Parsons to provide the ITS data.

All CSSA samples analyzed by ITS were replaced, except those which could not be re-collected (such as quarterly groundwater samples, IDW samples, and samples collected at locations which were later disturbed). New samples were collected at adjacent locations and analyzed by laboratories which were carefully audited prior to the analyses and which met AFCEE QAPP requirements. One hundred percent of the rework analytical data have been validated by chemists from Parsons, AFCEE, and third party contractors. Evaluation of the questionable ITS data at this time would add no protection to human health or the environment.

If you should need any additional questions or need further clarification, please do not hesitate to contact me at (210) 295-7416.

Sincerely,


JASON D. SHIRLEY
Installation Manager

Attachment

cc: Mr. Greg Lyssy
EPA Region 6

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

Ms. Teri DuPriest
Air Force Center for Environmental Excellence

Ms. Julie Burdey
Parsons