

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 17, 2003

CERTIFIED MAIL No. 7002 2030 0006 2483 0962
RETURN RECEIPT REQUESTED

Lt. Colonel Jason D. Shirley, Ret.
Installation Manager
Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, Texas 78015

Re: Compliance Evaluation Investigation (CEI) at:
25800 Ralph Fair Road, Boerne, Bexar County, Texas 78015
TCEC SWR No.: 69026; EPA ID No.: TX2210020739; TCEQ Regulated Entity No. RN100662840

Dear Lt. Colonel Shirley:

On April 29, 2003 and May 6, 2003, Jorge Salazar of the Texas Commission on Environmental Quality (TCEQ) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for industrial and hazardous waste. No violations were documented during the investigation. However, some areas of concern were noted. Enclosed is a summary which lists the investigation findings.

Please submit to this office by **August 15, 2003**, a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each area of concern.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Jorge Salazar in the San Antonio Region Office at (210) 403-4059.

Sincerely,

A handwritten signature in cursive script that reads "Craig E. Messen".

for Henry Karnei, Jr.
Waste Section Manager
San Antonio Region Office
Texas Commission on Environmental Quality

HKJ/jes

Enclosures: Summary of Investigation Findings

(Rev. 9/25/00)

REPLY TO: REGION 13 • 14250 JUDSON RD. • SAN ANTONIO, TEXAS 78233-4480 • 210/490-3096 • FAX 210/545-4329

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

SUMMARY OF INVESTIGATION FINDINGS

Camp Stanley Storage Activity(CSSA), 25800 Ralph Fair Road, Boerne, Bexar County, Texas
TCEQ SWR # 69026; EPA ID # TX2210020739; TCEQ Regulated Entity No. RN100662840;
Investigation Date: April 29, 2003, and May 6, 2003

Unresolved Area of Concern from 2001 CEI

- F. This area of concern was initially identified during the July 11, 2001 CEI. The area of concern was not adequately addressed and remained unresolved during the March 26, 2002 CEI. The area of concern from the March 26, 2002 CEI stated: "quoted from the 2001 CEI 'Conversations with Mr. Murphy indicated that wipe samples have been collected from Building 40 (SWMU No. 002). The facility needs to evaluate the possibility of collecting concrete chip samples to better evaluate the extent of contamination, if any. The documentation regarding any future sampling needs to be submitted to the TNRCC San Antonio region office.' On November 7, 2001, the TNRCC San Antonio office received a copy of a letter from CSSA dated November 5, 2001 in response to the violations and areas of concern documented during the July 2001 CEI. CSSA stated that 'CSSA does not see the necessity for conducting additional "chip" sampling from the concrete floor.' The TNRCC San Antonio office believes that concrete chip samples would be a better evaluation of the extent of contamination, if any, of Building 40 (SWMU No. 002). The documentation regarding any future sampling needs to be submitted to the TNRCC San Antonio region office."

On May 28, 2002 a compliance letter with unresolved areas of concern was issued. The TCEQ requested documentation of any future sampling to be submitted to the TCEQ San Antonio Regional Office. Camp Stanley did not submit a response to this area of concern. However, during the site investigation on April 29, 2003, Mr. Jeff Aston, Environmental/Civil Engineer, Army Corps of Engineer Liaison, stated the facility conducted "chip" sampling on the concrete floor of Building 40. Please provide a copy of the "chip" sample results on the concrete floor of Building 40.

Areas of Concern from April 29, 2003 and May 6, 2003 CEI

1. Several Safety Kleen parts washers were observed in Building 90. Mr. Schwarz and Mr. Murphy stated that waste solvents have not yet been generated from the parts washers. Please provide the TCEQ San Antonio Regional Office with the intended disposal method for the spent solvent and sludge generated from the Safety Kleen parts washers.
2. During the May 6, 2003 site investigation, the writer observed several rusted five-gallon and one-gallon containers inside the coal bin area. Please remove the containers and provide documentation to the TCEQ San Antonio Regional Office on the disposal of the containers observed (i.e., waste determination documentation and manifests).
3. From July 24, 2002 through October 11, 2002 remediation activities occurred and the surface drainage at AOC-65 (Building 90) was reworked. During these activities a substantial amount of contaminated soils were removed from the site. Please provide to the San Antonio Regional

Office the total amount disposed of, copies of all the waste manifests, and waste determination documentation (i.e. analytical data, "contained-in policy", etc.) for these soils.

4. On June 3, 2003, the writer contacted Mr. Brian Murphy to request the waste determination documentation for hazardous and nonhazardous waste generated from the removal of soil at SWMU B-3 and the amounts of soils removed from the site. The writer requested the waste determination for the soils removed from SWMU B-10 and the total amount removed from the site. On June 5, 2003, the writer received an e-mail with attachments (waste determinations for B-3 and B-10 from Mr. Brian Murphy). However, the waste determination submitted did not include analysis for organic compounds and did not include the hazardous waste determinations for the hazardous soils shipped from B-3. Please provide to the TCEQ San Antonio Regional Office the hazardous waste determinations for soils shipped from B-3 and B-10.

Resolved Area of Concern - 2002 & 2001 CEI

- K. CSSA did not provide hazardous waste handling training records for Mr. Brian Murphy. CSSA needs to submit the training records. Mr. Murphy needs to obtain hazardous waste training annually due to the position being held by Mr. Murphy at the installation. The November 5, 2001 response stated "Although not current, Mr. Murphy has had 40-hour course on hazardous waste operations and training. CSSA will investigate obtaining training for him in the near future and provide a copy of the training certificate when completed." During the 2002 investigation CSSA was unable to provide any documentation of any training for Mr. Murphy. It was recommended that Mr. Murphy obtain hazardous waste training annually due to the position being held by Mr. Murphy at the installation.

On July 12, 2002, the TNRCC San Antonio Regional Office received a letter with an attachment (dated July 3, 2002) from LTC Jason D. Shirley, US Army, CSSA Commanding Officer, in response to an outstanding unresolved Area of Concern addressed during the March 26, 2002 CEI. CSSA provided a copy of Mr. Brian Murphy's hazardous waste training certificate dated June 27, 2002. This area of concern is considered resolved.