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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 25, 2003

LTC Jason D. Shirley  
Installation Manager  
Camp Stanley Storage Activity  
25800 Ralph Fair Road  
Boerne, TX 78015-4800

Re: Camp Stanley Storage Activity, Boerne, TX;  
TCEQ SWR No. 69026;  
Solid Waste Management Unit (SWMU) B-32;  
Your letter dated September 5, 2003

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has received your letter dated September 5, 2003 concerning the closure of SWMU B-32. Your letter provided additional basis to justify approval of SWMU B-32 closure according to the Risk Reduction Standard (RRS) No. 1.

The TCEQ has reviewed your September 5, 2003 letter, your previous letter dated May 5, 2003 and the final report for SWMU B-32 originally submitted in February 2003. These letters and report dealt with the RRS No. 1 closure for SWMU B-32. You have indicated that even though concentrations of barium, cadmium, chromium nickle and zinc were found above the groundwater protection standards and the site-derived background concentrations (or the RRS No. 1), the concentrations at these levels are still protective of human-health and the environment. You have further indicated that to leave such contamination without remediation is still prudent, cost-effective, reasonable and practical. Our review indicates that the TCEQ concedes with your assessment; consequently, the TCEQ approves your request for a RRS No. 1 closure for soil medium only at SWMU B-32.

The risk reduction rules in 30 Texas Administrative Code (TAC) §335.559(g)(2)(B) specify that persons must demonstrate that a contaminant in soil does not pose the potential for future release of leachate in excess of the groundwater concentration by showing that a contaminant in the soil does not produce a leachate in excess of the groundwater concentration when subjected to the Synthetic Precipitation Leaching Procedure, Method 1312 of Solid Waste 846. Other test methods that more accurately simulate the conditions at the facility may be used in place of this method; subject to approval by the executive director of the TCEQ. The TCEQ requires CSSA to use this method in

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documenting attainment of the RRS No. 1 when concentration of constituents in soil (at greater than two feet depth, i.e., Groundwater Protection (GWP)) are greater than background but less than the RRS No.2 GWP cleanup values. This additional process removes the ambiguity whether the risk standards were attained. Please ensure this procedure is implemented to avoid "mismatched" use of RRS No. 1 cleanup levels and background values for SAI and GWP and misapplication of TRRP standards to RRS remediation.

Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual closure or remediation fails to comply with these requirements, the burden remains upon CSSA to take any necessary and authorized action to correct such conditions. A TCEQ field inspector may review your final report and conduct a closure inspection of the site.

Please call me at 512.239-2371 or email me at [srayos@tceq.state.tx.us](mailto:srayos@tceq.state.tx.us) if you need additional information or wish to discuss this letter.

Sincerely,



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

cc: Mr. Greg Lyssy, U.S. EPA Region 6, 1445 Ross Ave (6SF-LT), Dallas, TX 75202-2733  
Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX  
78754  
Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX