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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 22, 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-34;
SWMU-34 Investigation Report - Proceed

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has received the report entitled *Final SWMU-34 RCRA Facility Investigation Report Addendum* dated August 2003. In Section 3.3 of the report, several recommendations were provided to meet Risk Reduction Standard (RRS) No. 1 cleanup and the 3008H Order.

The TCEQ has reviewed the report; our review indicates that you may proceed with the proposed recommendations. The TCEQ has the following comments regarding two of the recommended actions:

1. The report specified that "Although B-34-SS14 has a reported lead concentration of 89.63 mg/kg, this value only slightly exceeds the RRS1 of 84.5 mg/kg; therefore, excavation on the south side of McElroy Road is not considered warranted." The TCEQ does not concur with the recommendation. If contamination is left at the site that is greater than the site derived background of 84.5 mg/kg for lead, the TCEQ will consider the site closed according to RRS No. 2. As indicated in the TCEQ letter dated November 25, 2003, you may use the citation in 30 Texas Administrative Code §335.559(g)(2)(B) (i.e., use of Synthetic Precipitation Leaching Procedure) in 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. The alternative is to excavate and remove contaminated soils until site-derived background levels are attained prior to submitting as a RRS 1 closure.

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2. Continue to monitor volatile organic compounds (VOCs) during the investigation, removal and verification sampling. The justification that VOCs are not included because the analytes detected are not considered to be site-related is not acceptable.

Please call me at 512.239-2371 or email me at 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
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Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX