



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

May 19, 2004

U-060-04

Mr. Sonny Rayos
Texas Commission on Environmental Quality
Industrial and Hazardous Waste Section
PO Box 13087 (MC-127)
Austin, TX 78711-3087

Subject: Response to TCEQ letter dated March 24, 2004, Concerning the Off-Post Monitoring Report for June 2003 Camp Stanley Storage Activity (CSSA), Boerne, TX
TCEQ Solid Waste Registration Number 69026
EPA Identification Number: TXD2210020739

Dear Mr. Rayos:

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Materiel Command, U.S. Army, has received the letter from the Texas Commission on Environmental Quality (TCEQ), dated March 24, 2004, concerning the June 2003 Off-post Groundwater Monitoring Report submittal.

The letter listed comments and requested additional information. Based on a review of the comments, the following responses are provided:

Comment #1: Please submit a hard copy of Table 9 (Off-post Groundwater Metals Analytical Results) located in the report entitled Volume 5, Groundwater, Introduction to the Quarterly Groundwater Monitoring Program.

Response to Comment #1:

The cumulative analytical table referenced is contained in the CSSA Environmental Encyclopedia, which was created to serve as the administrative record and compile all of the documentation for environmental activities at CSSA in one comprehensive document. The CSSA Environmental Encyclopedia is available in a hard copy version, which is updated monthly with new reports. TCEQ-Austin has elected not to maintain a hard copy version. The TCEQ-San Antonio regional office does maintain a hard copy version. The CSSA Environmental Encyclopedia is also available in an electronic version, maintained on the internet at www.stanley.army.mil. For your convenience, a copy of Table 9 is attached.

Comment #2: Concentration trends for different drinking water wells are currently being graphically presented as time series and as a function of precipitation received at the Camp Stanley area. These graphical representations are somewhat erratic and does not necessarily show a trend. The TCEQ requests the re-submission of groundwater data for Figure 3.6 (RFR-10 PCE and TCE Trends) as time series and, in lieu of precipitation data, use instead the groundwater monitor well elevation reading at the time of sampling.

Response to Comment #2:

Figure 3.6 cannot be re-submitted with groundwater monitor well elevations for June 2003. Groundwater monitor well elevations cannot be measured at privately owned off-post drinking water wells. The privately owned drinking water wells do not have surface completions that will allow field sampling technicians to collect groundwater monitor well elevations at the time of sampling.

However, by agreement with two of the private off-post drinking water well owners, CSSA was allowed to re-fit the surface completions at two off-post wells to allow collection of a groundwater elevation. Beginning in December 2003, these groundwater elevations have been collected from two of the off-post wells (RFR-10 and LS-7). These groundwater monitor well elevations will be plotted on future concentration trend graphs for these two off-post wells.

Comment #3: Currently groundwater data is being presented as two separate reports: one for on-site and one for off-site. The "big picture" groundwater contamination is difficult to interpret with this distinct reporting. TCEQ suggests that at the last calendar quarter of sampling, a groundwater concentration map (linking both on and off-site data) be submitted. This is in reiteration of our earlier suggestion that future submittals of off-post (and on-post) quarterly groundwater reports should include groundwater concentration maps.

Response to Comment #3:

See attached groundwater concentration maps prepared for the June, September, and December 2003 groundwater concentrations. CSSA will submit these groundwater concentration maps at the last calendar quarter of sampling for future events.

If you have any questions or comments, please feel free to contact me at (210) 295-7416.

Sincerely,


Jason D. Shirley
Installation Manager

Attachments

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

Mr. Jorge Salazar
TCEQ Region 13 (ltr)

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

Ms. Julie Burdey
Parsons (ltr)