



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

September 1, 2004

U-158-04

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 August 19, 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 August 19, 2004, responding to the May 19, 2004, letter submitted by CSSA concerning the June 2003 Off-post Groundwater Monitoring Report submittal.

The TCEQ had originally requested additional information in the March 24, 2004, letter including 1) metals concentrations in off-post wells, 2) a trend analysis of groundwater concentration data, and 3) contaminant concentration maps for on- and off-site groundwater data.

For Item No. 1, groundwater monitoring at CSSA is covered under the EPA Order on Consent. Metals analyses of off-post well samples have been conducted periodically since the CSSA groundwater monitoring program began. A summary table of off-post metals analyses is attached. CSSA monitors on-post wells for metals once a year. The most recent metals sampling event occurred in June 2004. A summary of the on-post analyses will be submitted with the June 2004 Quarterly Monitoring Report.

Based on the cumulative findings on the on-post metals sampling program and evaluation during the CSSA Data Quality Objectives (DQO) process it was determined that elevated concentrations of metals are sporadic and not likely to be the result of on-post activities. Therefore, metals sampling off-post has not been conducted on a regular basis. This topic was addressed in some detail in our letter to you dated September 24, 2003.

For Item No. 2, attached are time series graphs of VOC analyses for selected Lower Glen Rose on-post wells at CSSA where analyses has been conducted back to 1991. Additional graphs are available in the CSSA Quarterly Monitoring Reports. Trend analyses will be addressed during groundwater monitoring optimization meetings. These meetings will cover sampling frequency, contaminants, and other related

groundwater monitoring topics. CSSA will document our findings and provide the results when available.

For Item No. 3, TCEQ requested larger maps with better resolution on figures previously submitted. Figures were developed which have one concentration map per page and are being submitted with this letter as attachments.

If you have any further questions, or if we can be of any assistance, do not hesitate to call me at 210-295-7416.

Sincerely,

  
Jason D. Shirley

Attachments

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

Mr. Jorge Salazar  
TCEQ Region 13 (ltr)

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

Ms. Julie Burdey  
Parsons (ltr)