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

December 27, 2004

U-010-05

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 the Texas Commission on Environmental Quality (TCEQ) Request for Additional Information on the Solid Waste Management Unit (SWMU) B-23A, Camp Stanley Storage Activity, Boerne, Texas, TCEQ SWR No. 69026

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 November 17, 2004, requesting additional information on the M34 delay-firing device and disposal of the ampoules found at SWMU B-23A.

The M34 delay-firing device consists of a metal tube with a spring-loaded firing pin that is restrained by a cellulose disc. A removable cap with a thumbscrew is located on one end of the tube, which allows for insertion and crushing of a solvent ampoule. The other end of the tube is threaded to affix a detonation device. Once a detonation device is screwed onto one end of the tube, an ampoule is inserted into the other end of the tube, and the thumb screw cap is replaced, the thumbscrew can be turned until the ampoule is crushed inside the tube. Once the ampoule is crushed, the solvent material inside the ampoule will deteriorate the cellulose lining/disc that holds the firing pin. Once the lining is weakened, the firing pin is released and the device will detonate.

The various colors of the ampoules correspond to different delay times for device detonation. The M34 ampoules measure approximately one-inch long and approximately one-inch diameter. At the time that closure activities were performed at B-23A, no intact ampoules were visible on the ground surface of the site.

The broken glass of the ampoules at SWMU B-23A was excavated along with site soils. Twenty cubic yards of soil and waste material, consisting of a small number of broken ampoules, were excavated from the site. Excavated material was stockpiled onsite so the material could be characterized for disposal. Disposal of the waste was conducted under waste profile CG-25591, C-10. Toxicity Characteristic Leaching Procedure (TCLP), metals, and Total Petroleum Hydrocarbons (TPH) results from the stockpiled waste indicated the material met Class 2 criteria, and the waste was disposed at Waste Management, Inc.'s Covel Gardens Landfill, in San Antonio, Texas.

I hope this explanation resolves all questions pertaining to the M34 firing device and the disposal of the ampoules found at SWMU B-23A. However, if you have any questions or comments, please feel free to contact me at (210) 295 7416.

Sincerely,

Jason D. Shirley
Installation Manager

cc: Mr. Greg Lyssy, EPA
Mr. Jorge Salazar, TCEQ Region 13
Mr. Kent Grubb, Fort Sam Houston
Ms. Neyda Gutierrez, AFCEE
Ms. Julie Burdey, Parsons