

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 10, 2005

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

Re: Area of Concern 66 - Approval of No Further Action;
Camp Stanley Storage Activity, Boerne, TX;
TCEQ SWR No. 69026;
EPA ID No. TX2210020739

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has received your letter dated October 7, 2004 written in response to TCEQ letter dated September 8, 2004. The TCEQ letter requested Camp Stanley to conduct additional soil sampling and analysis at Area of Concern (AOC)-66. Your letter indicated that previous geophysical survey and aerial photograph interpretation showed no anomalies found at AOC-66. From historical records, there are no apparent waste management at AOC-66. Your letter also indicated that previous soil sampling in AOC-38 (which is located adjacent to AOC-66), indicated VOCs were below the reporting limits despite soil gas surveys that indicated detects for PCE at AOC-66. The original report for AOC-66 requested an approval according to Risk Reduction Standard (RRS) No. 1. Currently, your letter requests the TCEQ to approve a No Further Action for AOC-66. The TCEQ has reviewed your letter and the original report submitted in June 2004. Based on our review the TCEQ approves a No Further Action for AOC-66.

Please note that it is the continuing obligation of persons associated with a site or facility to ensure that industrial solid wastes and/or municipal hazardous wastes are managed in such a way that it does not cause a discharge of wastes or an imminent threat of discharge, nor a nuisance or an endangerment to either human health or the environment as required by 30 TAC §335.4. Be advised that the burden remains upon the Camp Stanley Storage Activity to take necessary and authorized action to correct such conditions whenever they exist. In addition please note that in 30 TAC § 335.8(b)(5), Camp Stanley Storage Area must respond on a continuing basis (pursuant to the closure and remediation obligations of §335.8(b)) in the event that a substantial change in circumstances at the facility or area results in an unacceptable threat to human-health or the environment. A TCEQ field inspector may conduct an inspection of the site to determine compliance with the report.

During the meeting, in Austin, on January 20, 2005, the undersigned had indicated that the TCEQ cannot approve a RRS No. 1 for closure of AOCs that do not have laboratory analyses to support documentation of closure or remediation. As further stated during the meeting, the attainment of cleanup levels under the RRS must be demonstrated by sampling and analyses of samples from the media of concern. Such analyses shall

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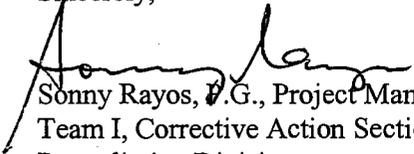
utilize techniques described in Solid Waste 846 Test Methods. Furthermore, non compound-specific test or qualitative test (such as, vapor gas survey) or other tests which indicate only positive or negative presence of contamination, may be used to aid in the determination of the lateral and vertical extent and volume of contaminated media; however, such non compound-specific test will only serve as indicator measures. Please see or refer to 30 Texas Administrative Code (TAC) §335.553(d) for a full text of this citation.

Please note that the TCEQ can approve a No Further Action for AOCs that meets the following criteria: 1) historic aerial photographs do not show any ground disturbance, waste disposal, etc., 2) magnetometer data or other geophysical methods taken at the AOC do not indicate any presence of any geophysical anomalies, 3) no apparent, observed or documented waste management activities were know to occur or conducted at the AOCs, and 4) contaminants at the AOC are sampled and analyzed by using only non compound-specific test or field screening techniques (e.g., soil vapor gas survey). Under the approval for a No Further Action, the caveat as stated in the second paragraph of the first page of this letter must be complied with. In addition, the TCEQ reserves the right to request additional information to enable the executive director to determine if the closure or remediation is compliant with the closure and remediation obligations as specified in 30 TAC §335.8. The TCEQ is encouraging CSSA or Parsons representatives to contact the undersigned to discuss a course of action for dealing AOC units under the above-stated similar circumstances.

To document compliance with the Texas Professional Geoscience Act, the Remediation Division will not review reports and documents received on or after September 1, 2004 that do not contain the seal of a Texas Professional Geoscientist for geoscience services and work. Reports and documents containing geoscience information that are not stamped with a Texas Professional Geoscience seal will be returned to the submitting party. For further information, please consult the webpage of the Texas Board of Professional Geoscience at <http://www.tbpg.state.tx.us>. Any inquiry regarding what constitute geoscience information or what information requires a Professional Geoscientist seal shall be made to the Board by calling 512.936.4400, in Austin, Texas.

Questions concerning this letter should be directed to my attention at 512.239-2371 or via email at srayos@tceq.state.tx.us.

Sincerely,


Sonny Rayos, P.G., 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