



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

April 24, 2008

U-117-08

Mr. Bryan Smith
Texas Commission on Environmental Quality
Industrial and Hazardous Waste Permits Section
P.O. Box 13087 (MC-130)
Austin, TX 78711-3087

Subject: Request for Reduction of Data Collection and Reporting
Requirements for the Pilot Study Class V Aquifer Remediation
Injection Wells at Camp Stanley Storage Activity, Boerne,
Texas, TCEQ Authorization No. 5X2600431; WWC12002216;
CN602728206/RN104431655

Dear Mr. Smith:

The Camp Stanley Storage Activity (CSSA), McAlester Army Ammunition Plant, Joint Munitions Command, Army Materiel Command, U.S. Army, is submitting this request to seek authorization to reduce the data collection requirements for the subject Class V Aquifer Remediation Injection Wells as discussed during your recent visit in December 2007. The injection activities are performed at the on-post Solid Waste Management Unit (SWMU) B-3 site as pilot study activities which include the injection of recovered groundwater into mulch/gravel-filled bioreactor trenches.

CSSA's current data collection and reporting requirements as specified by the subject Texas Commission on Environmental Quality (TCEQ) Underground Injection Control (UIC) permit for the SWMU B-3 Bioreactor Pilot Study includes:

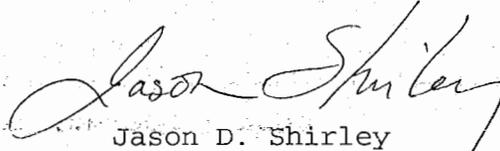
- **Bimonthly** - Injection volumes, pressures, and concentrations of contaminants (including pH and total dissolved solids) in the injected groundwater sampled bimonthly at the point of re-injection (prior to fluids being released into the trenches) and submitted to the TCEQ on a monthly basis.
- **Monthly** - The concentrations of contaminants in the trench bioreactor monitoring sumps and the surrounding monitoring wells sampled monthly and submitted to the TCEQ on a quarterly basis.

CSSA is requesting authorization for the reduction of data collection and reporting for the subject UIC permit based on the results of the data collected through ten months of operations at SWMU B-3 bioreactor pilot study. These data indicate that concentrations of contaminants in the injected groundwater continue to be well below the limits specified in 40 CFR §261.24 Toxicity Characteristics Table 1. In addition, this UIC well is near the middle of the 4,000-acre installation, approximately a mile from the nearest off-post boundaries. Therefore, CSSA proposes that bimonthly sampling requirements move to monthly sampling and the monthly sampling requirements move to

quarterly. Additionally, CSSA requests all monthly and quarterly collected data be reported semi-annually to the TCEQ (see attached table 1 for a summary of current and proposed monitoring and reporting schedule).

If you have any questions regarding the information contained in this letter, please feel free to contact Glare Sanchez, CSSA Environmental Program Manager, at (210) 698-5208 or Ken Rice, Parsons, at (512) 719-6050.

Sincerely,



Jason D. Shirley
Installation Manager

Attachments

cc: Glare Sanchez, CSSA Environmental Program Manager
Greg Lyssy, USEPA Region 6
Robert Bowersock, USACE
Julie Burdey, Parsons
Ken Rice, Parsons
Brian Vanderglas, Parsons
File: 745493.03000

Table 1
Class V Aquifer Remediation Injection Well Permit #5X2600431
Sampling and Monitoring Schedule for the B3 Bioreactor Pilot Study
CSSA - Boerne, Texas

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Class V Aquifer Remediation Injection Well Permit #5X2600431
Sampling and Monitoring Schedule for the B3 Bioreactor Pilot Study
CSSA - Boerne, Texas

	Sampling or Monitoring Location	Parameter(s)	Sampling Frequency	Reporting Frequency
Current Regulatory Req.	Flow meters (6) for each trench on downstream side of the header and one flow meter on the upstream side of the header	Injection volume	Twice per month (record)	Monthly
	Pressure gages (4) on both sides of the transfer pump, at the bag filter and on the header	Pressure on the transfer pump	Twice per month (record)	Monthly
	Sampling port (1) on the upstream side of the distribution header	- pH (field) and TDS (lab) - VOCs (b)	Twice per month	Monthly
	Trench sumps (5) (b)	- pH (field) and TDS (lab) - VOCs (b)	Monthly	Quarterly
	MPMWs (4) (c)	- pH (field) and TDS (lab) - VOCs (b)	Quarterly	Quarterly
Proposed Regulatory Req.	Flow meters (6) for each trench on downstream side of the header and one flow meter on the upstream side of the header	Injection volume	Monthly (record)	Semi-Annual
	Pressure gages (4) on both sides of the transfer pump, at the bag filter and on the header	Pressure on the transfer pump	Monthly (record)	Semi-Annual
	Sampling port (1) on the upstream side of the distribution header	- pH (field) and TDS (lab) - VOCs (a)	Monthly	Semi-Annual
	Trench sumps (5) (b)	- pH (field) and TDS (lab) - VOCs (a)	Quarterly	Semi-Annual
	MPMWs (4) (c)	- pH (field) and TDS (lab) - VOCs (a)	Quarterly	Semi-Annual

Notes:

- (a) Standard list of VOCs tested at CSSA
- (b) Bioreactor trench sumps (BTS) include: Trench 1 - 1-1, 1-2 and 1-3; Trench 2 - 2-1 and 2-2; Trench 3 - 3-1 and 3-2; Trench 4 - 4-1; Trench 5 - 5-1 and 5-2; Trench 6 - 6-1 and 6-2. Samples are collected from all trench sumps which includes the injection of CS-MW16 groundwater.
- (c) Multi-port monitoring wells (MPMW) include: CS-WB05 (9 sampling ports), CS-WB06 (6 sampling ports), CS-WB07 (6 sampling ports) and CS-WB08 (6 sampling ports). MPMW will be sampled quarterly and include only Zone LGR-03B for each MPMW. Surrounding monitor wells includes: CS-MW1-LGR, CS-B3-MW01-LGR, CS-D-LGR, CS-MW16-LGR and CS-MW16-CC.