

**Meeting Minutes
From
Camp Stanley Storage Activity
And
TNRCC Ground Water Meeting**

March 15, 2000

Participants:

Tom Haberle	TNRCC Water Section Team Leader
Abigail Power	TNRCC Environmental Investigator
Craig Meppen	TNRCC Environmental Investigator
Jay Don Jobson	TNRCC Environmental Investigator
Brian K. Murphy, CSP	Camp Stanley Storage Activity, Environmental Officer
Chris Beal	Camp Stanley Storage Activity, Environmental Assistant under contract from Waste Policy Institute, San Antonio Office

Purpose:

- Bring TNRCC up-to-date on recent analytical results from drinking water wells located on Camp Stanley Storage Activity (CSSA) Well 1 and an off-site well (Mr. Thomas Garcia's) located approximately 100 feet from the southwest corner of the installation. Laboratory analyses of water samples collected from these wells in December 1999 found below MCL levels of tetrachloroethene (PCE) and trichloroethene (TCE). Preliminary/unvalidated results from confirmation samples collected from the off-site well on 6 March 2000 confirm the previous contamination finding.
- CSSA was seeking guidance and recommendations regarding community outreach and additional off-site monitoring.
- CSSA would also like to establish a single TNRCC Regional point of contact (POC) to help coordinate future environmental activities through their office in cooperation with Kirk Coulter at the Austin Office. TNRCC involvement is essential to the success of the CSSA environmental program and at each milestone of the process.

Note: A copy of the Agenda for this meeting is attached to this e-mail.

Background:

Camp Stanley began the meeting by distributing a proposed agenda. Initially, CSSA presented a quick summary of the base environmental history including information on

the first discovery of ground water VOC contamination in 1991 by the TDH; history of the on-site and off-site ground water monitoring program since 1991; and an overview of historical ground water contamination trends. A copy of CSSA's ground water sampling activities since 1994 as depicted in our Environmental Encyclopedia was provided to inform them of each sampling event. Included was information on the RCRA, Section 3008(h), Administrative Order on Consent which was signed with EPA Region 6 on 5 May 1999.

Community Outreach:

CSSA presented an overview of their Community Relations Plan activities, including statistics on the December 1999 postcard questionnaire mail-out. CSSA also discussed two proposed Environmental Fact Sheets that are under development to explain the Base's environmental program and ground water contamination/monitoring program. These fact sheets are currently under internal review. CSSA requested that TNRCC be involved with the review process for these documents. TNRCC agreed to review the documents and indicated that they had public relations specialist in Austin that can also assist us.

CSSA requested information on skilled third party groups or individuals that can provide assistance with technical issues associated with the complexities of explaining risk and jargon used in the environmental field. TNRCC suggested contacting Sam Sanchez, Bexar Metropolitan Health District and Captain Brian Sassman, Kelly AFB on Public Health Service ASTDR guidance and information regarding risk associated with the ground water contamination. TNRCC also provided references to Public Health Service toxicology profiles for VOCs. CSSA indicated that public meetings may be required to help convey information about the off-site program.

TNRCC indicated they would like to be notified of any public meetings and that they would be in attendance as an audience member.

Off-Site Monitoring:

CSSA presented a map depicting off-site wells located within close proximity of the southwestern corner of the base. There are approximately 20 wells located within this area of concern. Eight of the wells are owned and operated by Bexar Metropolitan Water District and supply drinking water to approximately 800 residents in the Leon Springs Villas and Hidden Springs Estates subdivisions. The remainder of the wells supply private homes, commercial establishments, and church properties. Review of the Bexar Metropolitan Water District Consumer Confidence Report indicated that during 1998, they had a detection of 0.7 ug/L TCE in their water system. TNRCC pulled analytical files on the Leon Springs Villas water system and found that the July 1998 TCE hit was from entry point 2. Two wells contribute water to entry point two and are located on Fahrenthold Court, located just southwest of CSSA approximately 100 feet from the installation boundary. Subsequent sampling of entry point 2 in July and November 1999

found 0.5 ug/L and <0.5 ug/L TCE, respectively. Further review of the Leon Springs Villas analytical records found a TCE detection from entry points 1 at 0.76 ug/L and 2 at 0.58 ug/L in 1994. Entry point 1 is believed to be located on Ima Ruth Road, approximately 500+ feet from CSSA's southern boundary. TNRCC offered to supply CSSA with copies of their Bexar Met/Leon Springs Villas analytical records and indicated that additional, pre-1994 data is available through their Austin office. They will provide a POC and phone number for this action item.

CSSA also indicated that a draft Off-site Monitoring Response Plan is being developed and is under internal review. TNRCC review and input on the Plan, as well as EPA, AFCEE, and Parsons Engineering Science, will be requested when completed. In its present form, the Plan will include sampling and analyses of approximately 20 off-site wells, within a 1-mile radius of CSSA's southern boundary, and will contain Action Levels and Army responses for exceedances of Plan established criteria. It is anticipated that the sampling would be done half of the wells within 6 months, and the other half within 1 year. CSSA will sample the wells closest to the installation in the first round of ten wells.

TNRCC indicated that the new Texas Risk Reduction Program (TRRP) contains provisions for off-site plume management zones and should be used as guidance in developing the off-site plan. Also, TNRCC prefers off-site ground water samples be collected before the water enters a pressure tank. However, since we are unsure of each of the wells condition at the present time, we will have to look at well on a case-by-case basis for initial sampling. Future sampling may indicate manipulation of aboveground piping, but CSSA wants to ensure these measures are necessary. TNRCC also wants 14-days notice prior to sampling so they could have the option to collect duplicate or split samples. They were advised that the EPA H Order covered this notification and they should already be on the notification list. CSSA will ensure that Parsons Engineering Science has the Regional Office on the distribution.

TNRCC cautioned that property and water rights may be effected and legal implications will need to be researched and evaluated. Any guidance on this issue by any of the recipients is welcome.

CSSA presented a map depicting off-site and on-site monitoring results for September and December 1999 from the Garcia well and Well 1. It was pointed out that Well 1, which was sampled during both events showed a slight increase in TCE and initial indications of PCE. The Garcia well was sampled for the first time in December 1999 and again on 6 March 2000. However, the March results are preliminary since the numbers have not undergone data validation.

Remedial Investigation:

CSSA provided maps depicting locations of new monitoring and cluster wells to be installed during the spring/summer of 2000 and the location of new soil gas surveys to be

conducted near the southwestern end of the base. The locations of the known VOC source areas (SWMUs O-1 and B-3) that are currently undergoing remediation were also depicted. CSSA also indicated that boring samples are to be collected in the old solvent vat at Building 90 (AOC-65) and that recently, the environmental office became aware of an another previous vat location in Building 90 that has been filled with concrete. TNRCC requested notification of the vat sampling, so they could be available to split the soil samples.

Other Environmental Issues:

CSSA provided information on an apatite mineral/phosphate stabilization pilot study that will be conducted on metals contaminated soil from the CSSA Open Burn/Open Detonation (OB/OD) area (SWMU B-20). A meeting with CSSA, Parson's Engineering Science and UFA Ventures, the technology vendor is scheduled for April 6, 2000. CSSA invited TNRCC Regional representation at the meeting. TNRCC indicated they would be interested in reviewing the results of the pilot study, but declined to attend the planning meeting. TNRCC also cautioned that since CSSA is seeking a Risk Reduction Rule Standard (RRS) 1 closure, and because off-site disposal would likely be required regardless of stabilization results, it would be wise to run TCLP metals analyses of the stockpile soil prior to treatment. Stockpile samples for the pilot study are to be collected during the week of March 20, 2000 by Parsons Engineering Science. TNRCC noted, if the soil tests are non-hazardous, it may be disposed of relatively inexpensively without going through the treatment process on-site and that RRS1 cannot be attained for in-situ processes. CSSA assured the TNRCC that we will attempt to reach RRS1 at as many sites as possible. However, some sites may not be efficiently cleaned to those levels and would require post-closure care and possible deed recordation.

CSSA provided background information on the use of passive diffusion sampler devices for monitoring ground water VOC levels. CSSA has been conducting a pilot study using diffusion samplers in selected on-site wells. Preliminary results suggest that diffusion samplers may provide VOC data that is comparable to samples collected using low flow purge/sampling techniques. CSSA will provide a copy of our Draft Diffusion Sampling Device Pilot Study.

CSSA indicated that the next quarterly ground water monitoring event is scheduled for the week of 20 March 2000. CSSA is also coordinating this event with the Camp Bullis Training Site to allow collection of ground water elevation data from their wells during the same monitoring period. Only wells on the installation will be sampled during this event.

TNRCC mentioned that CSSA should evaluate the potential of perchlorate contamination at CSSA. CSSA indicated that the OB/OD range (SWMU B-20) is the only sight that had potential for perchlorate contamination. TNRCC noted that Southwest Laboratories in San Antonio was one of only a few labs that could perform the analyses.

Action Items:

CSSA

- A copy of the Draft Diffusion Sampling Pilot Study Report to TNRCC.
- CSSA to provide TNRCC 14 days notice prior to any ground water sampling event and SWMU/AOC activities. Will be done per the H Order, TNRCC should have been receiving notification of fieldwork.
- Copies of Maps and Tables provided to TNRCC will be sent to EPA, AFCEE, and Parsons Engineering Science for their records. They are as follows:
 - CSSA Off-site Well Information
 - On-site Well Information (Monitoring and Cluster Well planned installation locations)
 - September and December 1999 Well 1 and Garcia Results
 - Table of Well 1, Well 6, and Private Well Data (August 1991- December 1999)
 - Soil Gas Map for the Southwest portion of CSSA

Item **not** to be provided:

A copy of CSSA's Environmental Encyclopedia ground water sampling reports since 1994 as depicted in Volume 5, behind the Ground Water Monitoring tab was provided to TNRCC. All others have copies of this item in your version of the Environmental Encyclopedia.

TNRCC

- Barbara Ferguson Daewood, TNRCC Public Relation specialist, phone number.
- Sam Sanchez, Bexar Metropolitan Health District, Sanitarian, phone number.
- Brian Sassman of Kelly ASTDR/Kelly, phone number.
- Copies of the Bexar Met/Leon Springs Villas analytical history.
- A POC and phone number in Austin for the pre-1994 analytical results of Bexar Met/Leon Springs wells.

EPA, TNRCC, CSSA, AFCEE, and Parsons Engineering Science:

- Property and water rights which may be effected and legal implications of sampling activities.