ADDENDUM TO WORK PLAN
CSSA SITE INVESTIGATIONS DY01
REMOVAL ACTIONS FOR AOC 68, AOC 69 AND SWMU B-8

Parsons is currently under contract to provide investigations at former solid waste management units (SWMU) and areas of concern (AOC) at Camp Stanley Storage Activity (CSSA), Boerne, Texas. A Work Plan has been prepared for similar activities under the scope of work in effect for DY01 (Work Plan, Contract No. DACA87-02-D-0005, Task Order (TO) DY01, Parsons 2007). This work plan addendum provides description of additional activities to be conducted under Contract W912G-07-D-0028, delivery order (DO) 0011 for AOC 68, AOC 69, and SWMU B-8. Activities to be conducted under DO11 will follow the provisions of prior work plans in effect and available for review in the CSSA Environmental Encyclopedia, Volume 1, Work Plans.

Additional removal actions will be performed to remove impacted media and waste located at sites AOC 68, AOC 69, and SWMU B-8 (Figure 1). Removal actions will remove potential sources of contamination including metals impacted soils at AOC 68 and AOC 69. Additional activities to be conducted include stabilization of metals contaminated soil media at SWMU B-8 and transportation of the stabilized media from SWMU B-8 to the East Pasture firing range berm. Background information on the sites referenced can be found in Volume 3-1 of the CSSA Environmental Encyclopedia. Additional specific activities associated with these removal actions are described in the Resource Conservation and Recovery Act (RCRA) Facility Investigations (RFI) Interim Measures Waste Management Plan (Parsons 2006).

AOC 68

Soil sampling results from December 2007 and April 2008 indicated that removal of approximately 15 additional cubic yards (CY) of soil is required at AOC 68. Removal actions will remove lead and cadmium soils impacted above background levels. Excavated media will be placed into a roll-off box for off-post disposal as Class 2 non-hazardous contaminated media. The exact location of removal will be field-determined, but will remain near AOC 68 as shown in Figure 2.

AOC 69

AOC 69 is located on the western boundary of CSSA. Soil sampling results from 2001 and June 2008 indicated that removal of approximately 400 CY of soil is required at AOC 69. Removal actions will remove lead, barium, and copper impacted soil and debris (approximately 400 CY) located in the north and northeast portion of the site. Metal scrap encountered will be segregated and recycled. Removal actions will include temporary stockpile areas within the AOC 69 delineated area shown in Figure 3.

SWMU B-8

SWMU B-8 is located in the North Pasture area of CSSA. Soil sampling results from 2001 and June 2008 indicated that removal of approximately 1,000 CY of soil is required at SWMU B-8. Removal actions will remove lead, barium, and copper impacted soils. Removal actions will include temporary stockpile areas, silt fencing for sediment control, and storm water diversion berms constructed as documented in the Storm Water Pollution Prevention Plan for the SWMU B-8 Excavation (Parsons 2008). The exact location of these features will be field-determined, and will likely extend to the north as shown in the SWMU B-8 proposed removal area shown in Figure 4.

Additional efforts at SWMU B-8 will include stabilization of lead and barium impacted soils (approximately 600 CY) to non-hazardous criteria with the use of PIMS® Apatite II material from PIMSNW, as approved by TCEQ letter dated May 7, 2008. Confirmation sampling of the excavated material will be conducted as described below. Soil mixing is expected to be accomplished within the SWMU B-8 boundary by use of heavy equipment such as a tracked excavator or wheeled front-end loaded. Transportation of confirmed non-hazardous soils to CSSA's East Pasture range berm will also be conducted. The stabilized soils will be spread appropriately with a dozer at the East Pasture range berm.

REMOVAL ACTION PROCEDURES

The upper soil cover and debris-free overburden will be removed and stockpiled nearby for future use as fill or top soil. For the media excavated, waste characterization sampling will occur at a frequency rate of 1 TCLP sample per 200 CY of media/waste for metals and for total petroleum hydrocarbons (TX 1005) for classification of waste to be disposed off-post. No ordnance material is anticipated to be present at the planned soil media removal action sites. Historical records and previously conducted investigations do not indicate that ordnance material will be encountered.

Each site's contaminated soils will be managed in accordance with CSSA's RFI Interim Measures Waste Management Plan (Parsons 2006). Soil media from AOC 68 and AOC 69 are expected to meet Class 2 non-hazardous criteria for off-post disposal at Covel Gardens Landfill in San Antonio, Texas or transported to CSSA's east pasture range berm. Metal debris that is deemed recyclable will be segregated into a scrap stockpile. Suspected hazardous or unknown materials will be segregated into separate stockpiles. The impacted soils at AOC 69 will be excavated to bedrock. It is anticipated that as much as 400 CY of excavated materials will require some form of management.

CSSA will utilize the Area of Contamination concept in managing and treatment of contaminated media or waste. Treatment efforts at SWMU B-8 will also include the stabilization of hazardous inorganic impacted media *in situ* before generation, thus rendering the media non-hazardous before transportation to CSSA's East Pasture range management unit. Additionally, management of remediation waste will follow USEPA

guidance memorandum issued October 14, 1998, Management of Remediation Waste under RCRA, EPA 530-F-98-026.

All removal work will be performed in Level D personal protective equipment. The excavated material will be handled and disposed as determined by waste characterization testing. Sampling methodology and quality control are described in the SAP addenda (*Sampling and Analysis Plan Addendum, DY01*, Parsons April 2007).

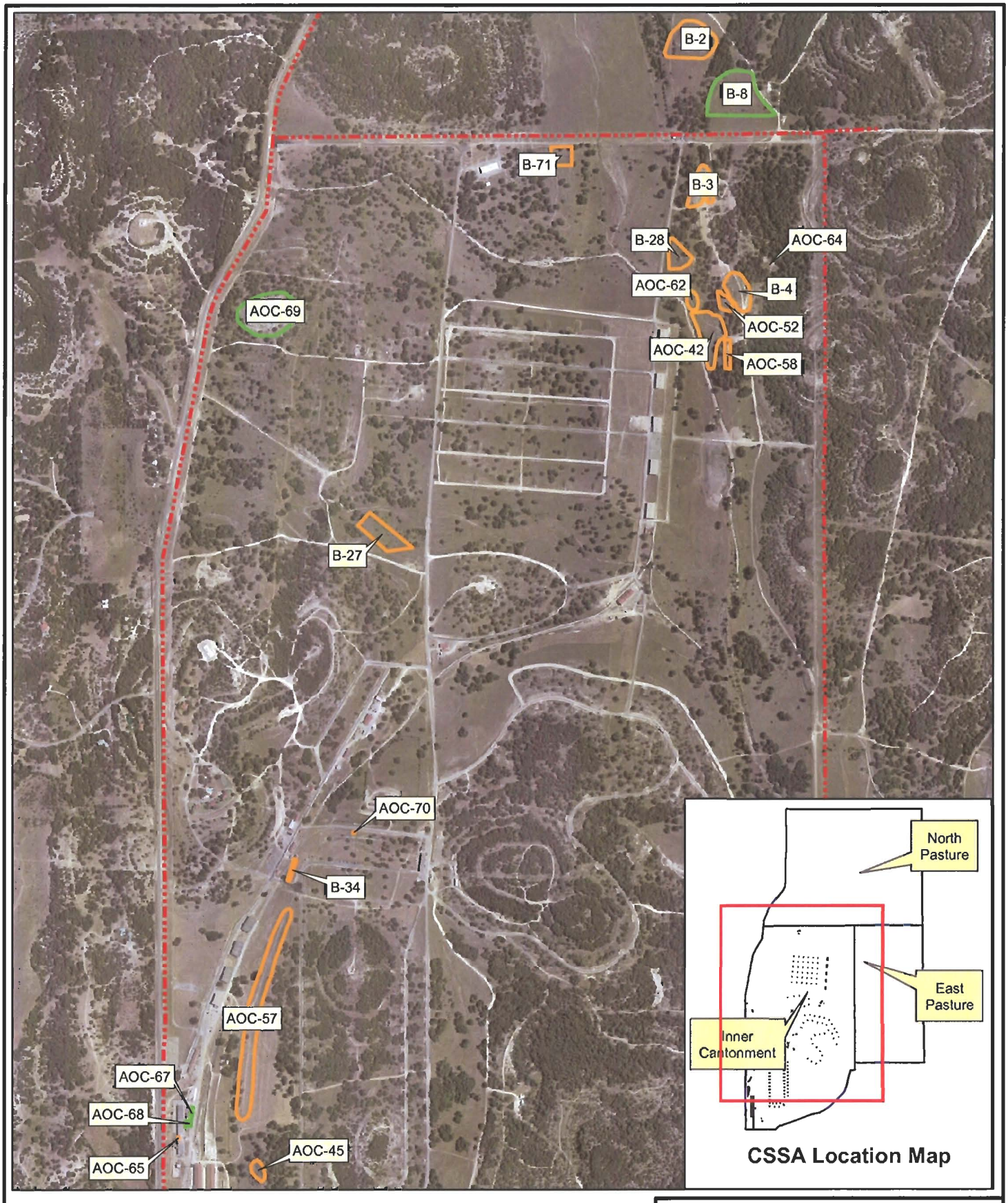

Figure 1

Location of Work Plan Addendum Sites

Camp Stanley Storage Activity

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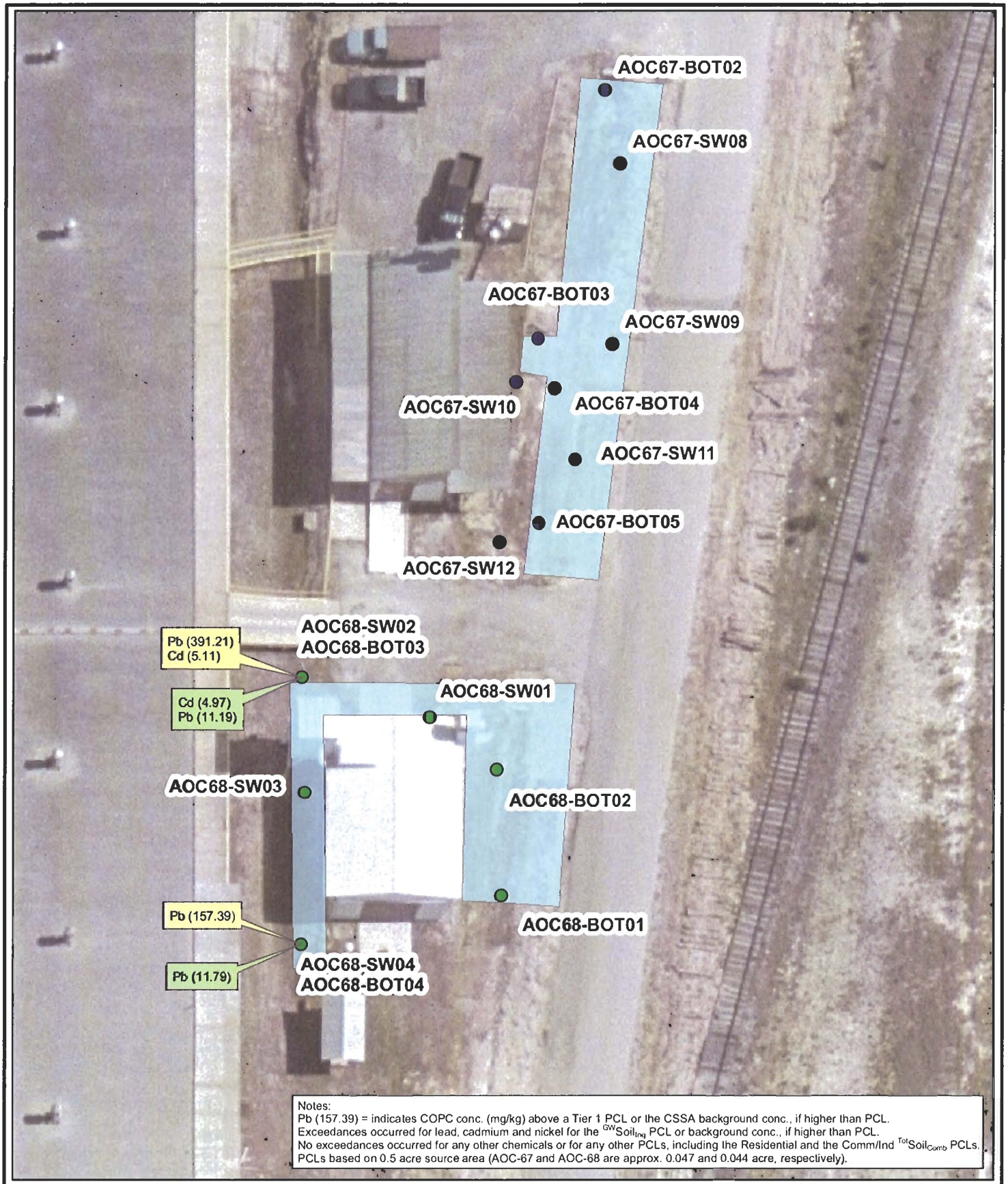

Figure 2

AOC-67 and 68
Site Map and Soil Sampling Results (Dec 2007 & Apr 2008)

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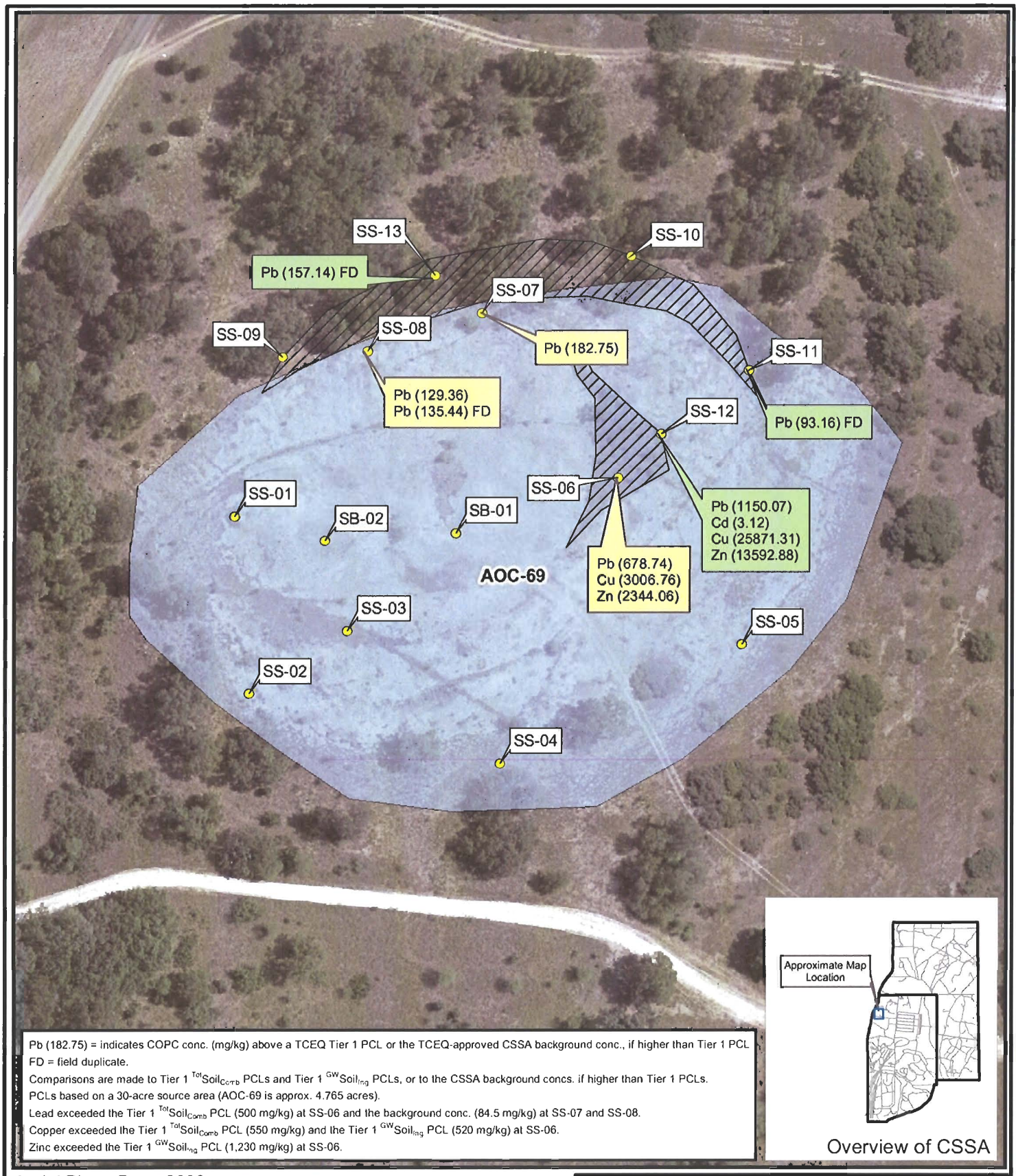

Pb (182.75) = indicates COPC conc. (mg/kg) above a TCEQ Tier 1 PCL or the TCEQ-approved CSSA background conc., if higher than Tier 1 PCL
FD = field duplicate.
Comparisons are made to Tier 1 $^{Tot}Soil_{Comb}$ PCLs and Tier 1 $^{GW}Soil_{Ing}$ PCLs, or to the CSSA background concs. if higher than Tier 1 PCLs.
PCLs based on a 30-acre source area (AOC-69 is approx. 4.765 acres).
Lead exceeded the Tier 1 $^{Tot}Soil_{Comb}$ PCL (500 mg/kg) at SS-06 and the background conc. (84.5 mg/kg) at SS-07 and SS-08.
Copper exceeded the Tier 1 $^{Tot}Soil_{Comb}$ PCL (550 mg/kg) and the Tier 1 $^{GW}Soil_{Ing}$ PCL (520 mg/kg) at SS-06.
Zinc exceeded the Tier 1 $^{GW}Soil_{Ing}$ PCL (1,230 mg/kg) at SS-06.

Aerial Photo Date: 2003

N
W E
S

100 50 0 100 Feet

- Sample Sites
- AOC-69 Clearance Area
- AOC-69
- New Sample Results
- Initial Sample Results

Figure 3

AOC-69 Sample Points

Camp Stanley Storage Activity

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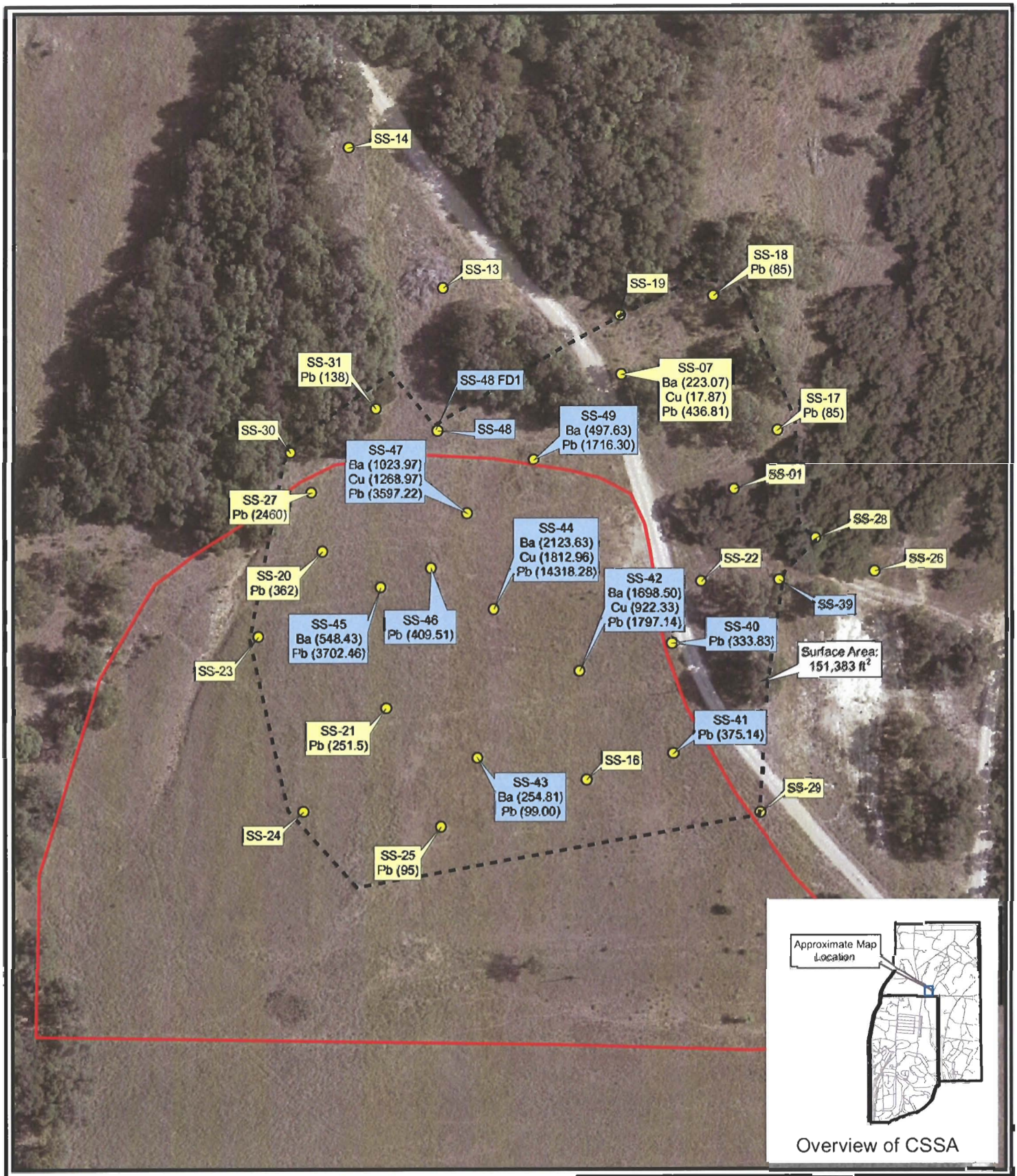

Aerial Photo Date: 2003

N
W E
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90 45 0 90 Feet

SWMU B-8 Boundary

Proposed Removal Area

Sample Locations

Samples collected June 24, 2008*

Samples collected 2001 (field test kit)*

*Concentrations shown (mg/kg) indicate above TCEQ TRRP criteria (April 23, 2008)

Figure 4

B-8 Samples

Camp Stanley Storage Activity

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