RFI AND INTERIM MEASURES WASTE MANAGEMENT PLAN ADDENDUM AT CAMP STANLEY STORAGE ACTIVITY BOERNE, TEXAS

Addendum Specific to SWMU B-4

A waste management investigation will be performed to remove impacted media and buried waste located at SWMU B-4 (Figure 1). Procedures are described in the *Work Plan and Sampling and Analysis Plan Addendum, SWMU B-4*, February, 2012. Background information on this site can be found in the <u>CSSA Environmental Encyclopedia, Volume 3-1.</u>

In accordance with the TPDES General Permit No. TXR150000, erosion control features are required and are detailed in the *Storm Water Prevention Plan (SWPP) for SWMU B-4, February 2012.*

The investigation for SWMU B-4 will include a temporary staging area and mulch roll for sediment control. While the exact location of these features will be field-determined, the temporary staging area will be established to the southeast of the site and the mulch roll will be located to the west/southwestern portion of the site. Each of these features will be located outside the original boundary of the site. These features and the site boundary are shown on Figure 1.

All excavated soil media will be stockpiled for sorting of debris and certification to be free of munitions and explosives of concern (MEC). Segregated stockpile areas may be delineated based on field screening assessments, analytical data results, or material contained therein. In the unlikely event that suspected hazardous or unknown materials are encountered, these will be segregated into separate stockpiles. Because MEC may be encountered during the investigation, all excavation activities will be supervised by UXO technicians to provide UXO identification and avoidance for the workers and equipment performing the removal action activities and to address safety issues associated with ordnance material.

The sampling methodology, analytical parameters, and quality control measures that will be followed for this effort are described in the SWMU *B-4 Work Plan and Sampling and Analysis Plan (WP/SAP) Addenda*, February, 2012. Excavated soil media which is believed to contain potential contaminants of concern (COCs) greater than 20 times the regulated TCLP criteria (*i.e.*, 20 times rule) will undergo waste characterization sampling at a frequency of 1 sample per 200 CY. For all other soil media, waste characterization sampling will occur at a frequency of 1 sample per 500 CY.

All impacted soil media, as defined by the SWMU *B-4 WP/SAP Addenda*, that meets non-hazardous criteria and CSSA standards for berm reuse will be transported to the East

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Pasture berm for reuse. All non-impacted soil, as per analysis results, will be reused on the site. The trench contents and impacted soil will be excavated until all evidence of impact is removed. It is anticipated that as much as 2,100 CY of soil 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 will include the stabilization of hazardous inorganic impacted media (i.e. with use of Apatite II, etc.) within the defined area of contamination, thus rendering the media non-hazardous before disposal or recycling. Additionally, management of remediation waste will follow USEPA guidance in a memorandum issued on 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 results of waste characterization testing, as described above.

