

**RFI AND INTERIM MEASURES WASTE MANAGEMENT PLAN  
ADDENDUM  
AT  
CAMP STANLEY STORAGE ACTIVITY  
BOERNE, TEXAS  
Addendum Specific to SWMU B-13**

**SECTION 1  
INTRODUCTION**

A Site Closure Investigation will be performed at Camp Stanley Storage Activity (CSSA) to remove impacted media and buried waste located at Solid Waste Management Unit (SWMU) B-13 to achieve closure of the soil zone. The closure methodology and procedures are described in the *SWMU B-13 Work Plan and Sampling Analysis Plan Addendum*, dated September 2012. Background information on SWMU B-13 can be found in the CSSA Environmental Encyclopedia, Volume 3-1. Specific activities associated with this RFI/IM WMP and planned RFI/IM Waste/Contaminated Media Management is associated with this addendum.

The investigation at SWMU B-13 will include two excavation areas and two temporary staging areas (**Figure 1**). The exact locations of the temporary staging areas will be field-determined.

The staging areas identified on Figure 1 will be utilized during the processing of the excavated material from SWMU B-13. 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 exotic (unknown) materials are encountered, these will be segregated into separate stockpiles. Munitions and explosives of concern (MEC) have not been confirmed at SWMU B-13, however MEC have been identified at other landfills near SWMU B-13. As a precaution, 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-13 Work Plan and Sampling and Analysis Plan Addendum*, Parsons, September 2012. For excavated soils, waste characterization sampling will occur at a frequency rate of 1 sample per 500 CY. Waste characterization samples will be analyzed by the toxicity characteristic leaching procedure (TCLP) for RCRA 8 metals, total analysis for CSSA 9 metals, in addition to other analysis, as appropriate. All impacted soils that meet non-hazardous criteria and CSSA standards for berm reuse will be transported to the East Pasture berm. Impacted 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. It is anticipated that as much as 6,000 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 PIMS, 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 waste characterization testing, as described above.

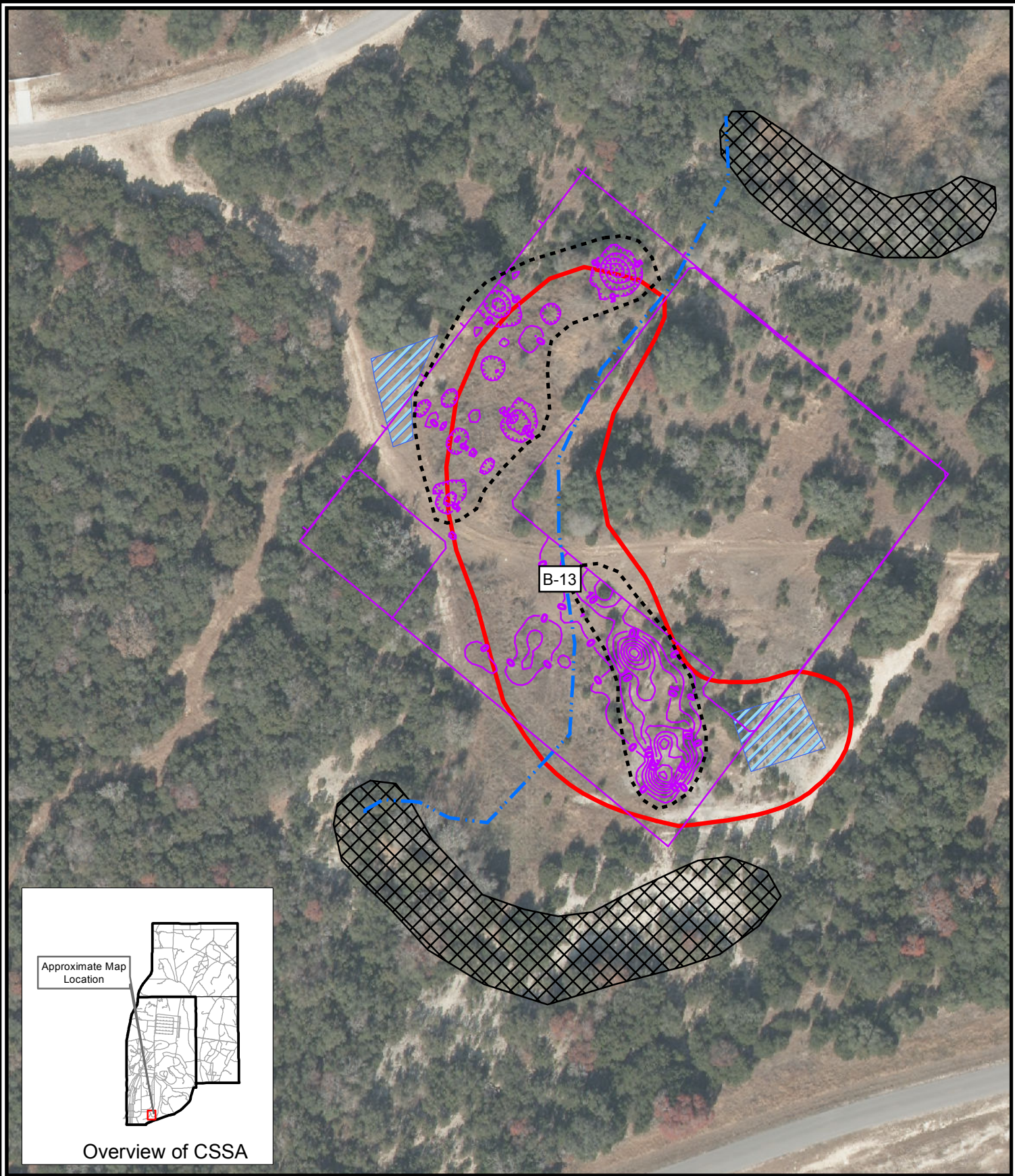










Figure 1  
 SWMU B-13  
 Proposed Excavation Effort  
 Camp Stanley Storage Activity  
**PARSONS**

-  Preferential Site Drainage Path
-  Proposed Excavation Areas
-  EM Survey Contours
-  General area of a pre-existing berm
-  Site Boundary
-  Proposed Staging Area