RFI AND INTERIM MEASURES WASTE MANAGEMENT PLAN ADDENDUM

AT CAMP STANLEY STORAGE ACTIVITY BOERNE, TEXAS

Addendum Specific to RMU-2

SECTION 1 INTRODUCTION

A Site Closure Investigation will be performed to remove impacted soils at RMU-2 to achieve closure of the soil zone. The closure methodology and procedures are described in the *Work Plan and Sampling Analysis Plan Addendum for RMU-2*, February, 2011. Background information on RMU-2 can be found in the <u>CSSA Environmental Encyclopedia</u>, <u>Volume 3-2</u>. Specific activities associated with this RFI/IM WMP and planned RFI/IM Waste/Contaminated Media Management is associated with this addendum.

The investigation for RMU-2 will include the excavation of impacted. Figure 1 shows the site location and map. The sampling methodology, analytical parameters, and quality control measures that will be followed for this effort are described in the *Work Plan and Sampling and Analysis Plan Addenda for RMU-2*, May 2011. Waste characterization sampling will occur at a frequency of 1 sample per 500 CY. Soil media, which has been shown through laboratory analysis or field testing methodology (e.g. XRF, etc.) 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. Any soil media identified above characteristic hazardous criteria (40 Code of Federal Regulations [CFR] 261.24) will be treated on site (i.e. with use of Apatite II, etc.) in accordance with the *RFI/Interim Measures Waste Management Plan* to non-hazardous levels. It is anticipated that approximately 2000 CY of soil will require some form of management.

All non-impacted soil, as per analysis results, will be reused on the site. All impacted soil media that meets non-hazardous criteria, either initially or once treated, and CSSA standards for berm reuse (e.g. no large boulders, no pieces of metal greater than six inches, no materials identified as MEC items, etc.), will be transported to the East Pasture berm for reuse. Parsons will coordinate the transportation of soils to the East Pasture berm with CSSA personnel.

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

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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.

