

**RFI AND INTERIM MEASURES WASTE MANAGEMENT PLAN
ADDENDUM
AT
CAMP STANLEY STORAGE ACTIVITY
BOERNE, TEXAS
Addendum Specific to RMU-3**

**SECTION 1
INTRODUCTION**

A Site Closure Investigation will be performed to remove impacted soils at RMU-3 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-3*, November 2012. Background information on RMU-3 can be found in the CSSA Environmental Encyclopedia, Volume 3-2. Specific activities associated with this RFI/IM WMP and planned RFI/IM Waste/Contaminated Media Management is associated with this addendum.

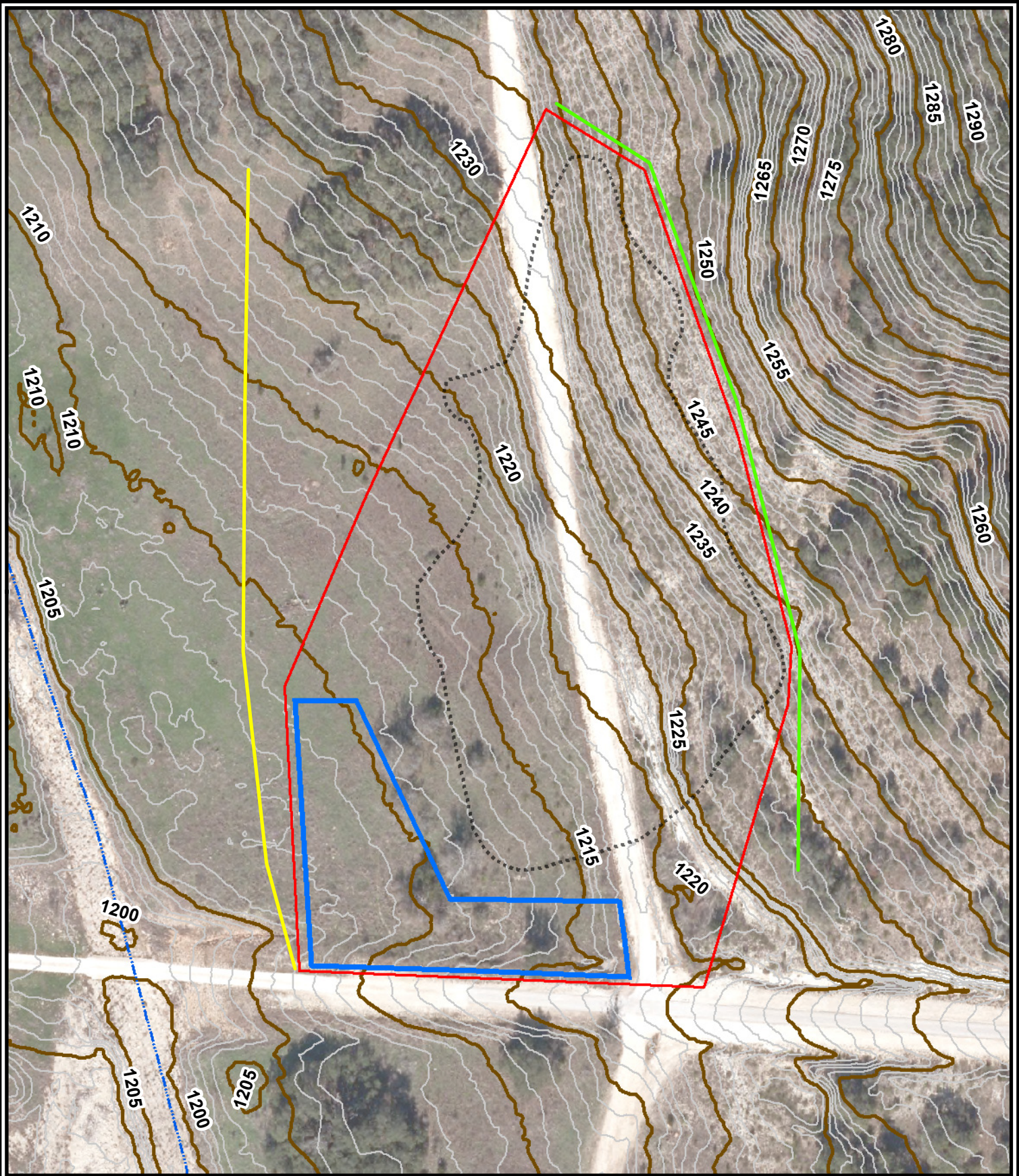
The investigation for RMU-3 will include temporary staging areas and silt fencing for sediment control. While the exact location of these features will be field-determined, the temporary staging areas will be established to the south and west of the proposed excavation area, and the silt fencing will be located along the western portion of the site. These features and the site boundary are shown on **Figure 1**.

All excavated soil media will be stockpiled for waste characterization purposes. In the unlikely event that suspected hazardous or other materials are encountered, these will be segregated into separate stockpiles. 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-3*, November 2012.

For impacted soil media, waste characterization sampling will occur at a frequency of 1 sample per 500 CY. 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. All impacted soil media that meets non-hazardous criteria, and CSSA standards for berm reuse, will be transported to the East Pasture berm for reuse. Any soil media identified above characteristic hazardous criteria (40 Code of Federal Regulations [CFR] 261.24) will be treated in accordance with the RFI/Interim Measures Waste Management Plan to non-hazardous levels and managed as appropriate. It is anticipated that as much as 3,500 CY of soil will require some form of management. **Figure 1** shows the proposed excavation area.

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.



0 25 50 100
 Feet

- Proposed Silt Fence
- Proposed Diversion Berm
- Proposed Excavation Extent
- Proposed Staging Area
- Intermittent Stream
- 5 Foot Contours
- 1 Foot Contours
- RMU-3 Boundary

Figure 1

RMU-3
 Drainage Control Features
 Camp Stanley Storage Activity

PARSONS