

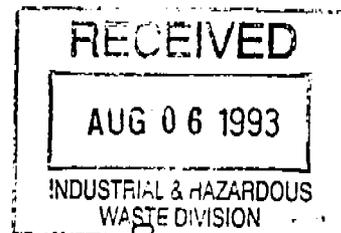
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DEPARTMENT OF THE ARMY  
CAMP STANLEY STORAGE ACTIVITY, RRAD  
POST OFFICE BOX 690827, SAN ANTONIO, TEXAS 78269 - 0627

August 5, 1993

Office of the Commander



Mr. Guy L. Tidmore  
Chief, Texas Section (6H-CT)  
RCRA Enforcement Branch  
U. S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

Dear Mr. Tidmore,

Section II of Attachment A to the complaint filed by EPA in connection with Red River Army Depot's Camp Stanley Storage Activity (CSSA) operations required the nomination of an independent audit firm to perform an environmental audit of the installation.

CSSA proposes that Engineering-Science, Inc. of Austin, Texas be approved as the audit firm to perform the environmental audit of Camp Storage Storage Activity required by Attachment A to the complaint. This recommendation is also set out in the response submitted by CSSA to the complaint filed by EPA. A copy of that response is attached hereto as Enclosure 1.

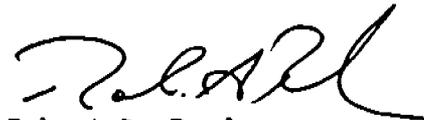
Engineering-Science has conducted an environmental assessment of CSSA which provides most of the information requested by the initial audit required by Attachment A.

Engineering-Science is well qualified to perform the required audit. They are one of several contractors qualified by the U. S. Air Force at Brooks Air Force Base in San Antonio and selected for award of a requirements contract to perform environmental studies, investigations and remediation work. They have been selected to perform several tasks at Camp Stanley since October 1991. They performed the evaluation, inspections and remediation tasks for upgrade of the underground storage tanks at CSSA. They have completed the evaluation of and closure plan for the hazardous waste holding area designated as "F-14", as well as the initial investigation, work plan, and the safety and health plan for Well 16, which was one of the drinking water wells for the installation, which has been taken out of service. They will, in a subsequent phase, provide recommendations for remediation procedures for this project. It should be noted that Engineering-Science has not been involved in establishing recordkeeping or operational procedures, the designing of equipment or structures, or the construction of equipment or structures at any of the Respondent's facilities.

Enclosure 2 is the information on the capabilities and experience of Engineering-Science. This provides the information on the firm requested by Section II of Attachment A.

We request that Engineering-Science, Inc. be approved as the audit firm to complete the required audit of CSSA. We further request, after EPA review of the Environmental Assessment recently completed by Engineering-Science, that this assessment be accepted as satisfying the requirement for the audit in Section II of Attachment A of the complaint. This environmental assessment will be submitted for EPA review as soon as the report is finalized.

Sincerely,



Robert A. Bender  
Captain, U. S. Army  
Commanding Officer

2 Enclosures  
as

Copies Furnished:

- ✓ Ms. Susan Ferguson, Dir, Industrial and Haz Waste, TWC, POB 13087, Capitol Sta, Austin, TX 78711 (less Encl 2)
- Environmental Law Div, ATTN: COL William J. McGowan, 901 N. Stuart St, Ste 400, Arlington, VA 22203-1837
- Cdr, RRAD, ATTN: Legal Ofc (Mr. Lonsberry), Texarkana, TX 75507-5000

I certify that the information contained in or accompanying this submission is true, accurate and complete. As to those identified portions of this submission for which I cannot personally verify the truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting upon my direct instructions, made the verification, that this information is true, accurate, and complete.

5 Aug 93

(Date)



ROBERT A. BENDER  
Captain, U. S. Army  
Commanding Officer