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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 29, 1996

LtCol. Schnelling, Commander
Camp Stanley Storage Activity (CSSA)
25800 Ralph Fair Road
Boerne, Texas 78015

Attn: Brian Murphy, CSSA Environmental Officer

Re: CSSA, Boerne, Texas
TNRCC Solid Waste Registration No. 69026
Practical Quantitation Limits (PQL's) for the
Closure of 19 SWMU's at CSSA

Dear Sir:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed your letter dated April 12, 1996. Your letter states that all but 16 of the PQL's can be met for the closure of the SWMU's at CSSA. The PQL's for the analytes of concern which Inshape Testing Services (ITS) is proposing are slightly higher than the PQL's the Air Force Center for Environmental Excellence (AFCEE) has listed in their Quality Assurance Project Plan (QAPP). Camp Stanley is planning to close 19 SWMU's under Risk Reduction Standard 1 (RRS1) and the letter states that the 16 volatile organic analytes are not suspected wastes at CSSA.

According to the attached table in the letter, the PQL's from AFCEE QAPP and the PQL's proposed by ITS are lower than the SW-846 8260 method except for two constituents. These two constituents (Trichlorobenzene and Bromochlorobenzene) are higher than the SW-846 8260 Method. According to the table, the PQL for Trichlorobenzene is lower than the RRS2 GW value and Bromochlorobenzene RRS2 GW was not available. The TNRCC accepts the slightly higher PQL's for the 14 analytes and Trichlorobenzene listed in the table. Medium-Specific Concentration values should be calculated for Bromochlorobenzene. If the MSC value for Bromochlorobenzene is higher than the projected PQL in the table, the PQL can be used. If the PQL for Bromochlorobenzene is higher than the calculated MSC value, then the PQL should be adjusted to a lower value.