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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 Inchape 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.

COMPLETION REPORT  
SUPPLEMENTAL ENVIRONMENTAL PROJECT NUMBER CSSA-02  
ENVIRONMENTAL SPECIALIST  
CONSENT AGREEMENT AND CONSENT ORDER  
DOCKET NUMBER RCRA VI-310-H

miscellaneous metal debris. At two other SWMUs, pilot studies of electrokinetic and soil vapor extraction technologies are underway. These SWMUs are the likely sources for the groundwater contamination. TNRCC and EPA concurred with CSSA that these sites required immediate attention.

CSSA has also continued its groundwater monitoring efforts. The installation of two additional deep monitoring wells, a weather station, dedicated slow flow pumps activities have been completed, and seismic refraction studies have been conducted.

Due to the large amount of data being gathered from site investigation and groundwater activities CSSA has established a geographical information system (GIS). It will be used for site specific air, water, soil, and other miscellaneous time and location-based data and will provide an excellent database for analysis work and remediation planning activities.