



DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, RRAD
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

April 20, 2004 (sic)

U-056-04

Mr. Sonny Rayos
Texas Commission on Environmental Quality
Industrial and Hazardous Waste Section
PO Box 13087 (MC-127)
Austin, TX 78711-3087

Subject: Response to the January 5, 2004 TCEQ SWMU Bldg 40 <90-day
Container Storage Area Closure Report Letter and the
February 23, 2004 SWMU Bldg 40 Request for Additional
Information, Camp Stanley Storage Activity, Boerne, Texas,
TCEQ SWR No. 69026

Dear Mr. Rayos,

In your letter dated January 5, 2004, you approved Risk Reduction Standard 1 (RRS1) closure of solid waste management unit (SWMU) Building 40. Subsequently, in your letter dated February 23, 2004, you indicated that the TCEQ cannot approve the report at this time. You requested additional information regarding final disposition of Building 40 and you indicated that volatile organic compound (VOC), SVOC, and PCB analyses of the final rinsate are required.

1. The Risk Reduction Rule, Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapter S, does not require identification of the final disposition of property, which is closed under RRS1 criteria. Required information for RRS1 closure is listed in 30 TAC §335.553(a). And, as specified in 30 TAC §335.554(g), once attainment of RRS1 has been demonstrated to the TCEQ Executive Director, the responsible person is released from deed recordation requirements and post-closure care responsibilities. Your January 5 letter clearly states that "SWMU Building 40 is released from deed recordation and post-closure care requirements." Building 40 has not been demolished, has not been used for approximately eight years, and future utilization of the building is undetermined. Based on the TCEQ letter dated February 23, 2004, are you, at this time, revoking the approved closure under RRS1 set forth by the TCEQ Letter dated January 5, 2004? CSSA respectfully requests written clarification be provided on the status of our RRS1 closure on Building 40.

2. SWMU Building 40, CSSA's former container storage area, is Unit 001. The new waste management unit form for this area was submitted to TNRCC on January 27, 1995. The form identified the list of wastes potentially managed at the site. The list did not include PCBs, but included the following materials:

<i>TNRCC Stream Description</i>	<i>CSSA Stream Description</i>	<i>TNRCC 8-digit Waste Code</i>	<i>EPA Codes</i>
Spent acid with metals	Spent acid from bluing operation	4001103H	D002
Spent caustic	Sodium hydroxide	4002109H	D002
Caustic aqueous waste	Spent nickel penetrate	4003110H	D002
Halogenated solvent	Tetrachloroethene	4004202H	F001 D039
Organic paint, ink lacquer, or varnish	Lead paint disposals	4005209H	D008
Other waste inorganic solids	Spent sand/ammunition	4006319H	D008
Other waste inorganic solids	Sand blaster	4007319H	D006
Other waste inorganic solids	Wheelabrator operations	4008319H	D006
Other waste inorganic solids	Glass bead tumbler	4009319H	D006
Other organic liquids	Volatile corrosion inhibitor	4010119H	D001
Other organic sludges	Solvent sludges	4011609H	D001
Petroleum contaminated solids	Solvent rags	4012489H	F001 D039 D040
Other organic liquids	Waste gasoline from portable generators	4013219H	D001
Other organic liquids	Fingerprint removal (methyl amyl alcohol)	4014119H	D001
Paint thinner or petroleum distillates	Solvent (mineral spirits)	4015211H	D008

Based on the list of materials, wipe samples were collected from the building floors and walls, analyzed for SVOCs, cadmium, and lead. There is no documentation of any PCB waste management at this site, nor are there any PCB waste disposal records associated with this unit, therefore, PCB sampling was not warranted. The building was not used for storage after 1996, and has been vacant for about eight years. VOCs were not analyzed because of the highly volatile nature of organic materials when stored, and the fact that the building sat empty through seven summers. Furthermore, no SVOCs were detected in wipe samples collected from the walls and floor prior to the 2002 pressure-wash of the building interior. VOCs are much more volatile than SVOCs, and since no SVOCs were detected VOCs were not a concern in the building. Based on the list of materials stored in the building, the SVOC wipe sample results, and the approved RRS1 closure of the SWMU Building 40, collecting rinsate samples for VOCs, SVOCs, and PCBs is not warranted.

The Building 40 Container Storage Area Closure Report, approved by TCEQ on January 5, 2004, can be referred to for further documentation associated with the site's approved RRS1 closure. If you have any questions or comments, please feel free to contact me at (210) 295-7416.

Sincerely,


Jason D. Shirley
Installation Manager

Attachments

cc: Mr. Greg Lyssy
EPA Region 6 (ltr)

Mr. Jorge Salazar
TCEQ Region 13 (ltr)

Mr. Kent Grubb
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge
Advocate (ltr)

Ms. Neyda Gutierrez
Air Force Center for Environmental Excellence (ltr)

Ms. Julie Burdey
Parsons (ltr)

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 23, 2004

LTC Jason D. Shirley
Installation Manager
Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, TX 78015-4800

Re: Camp Stanley Storage Activity, Boerne, TX;
TCEQ SWR No. 69026;
Building 40 <90-day Container Storage Area;
Request for additional information

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has received the report entitled *Building 40 Container Storage Area Closure Report* dated September 2003. This report described the closure of less than 90-day Container Storage Area Building 40 (Notice of Registration Unit 001). To attain clean closure, Building 40 was pressure washed and final rinsate samples were collected for verify closure. Laboratory analyses of the final rinsate were tested for cadmium and lead. The report concluded that clean-closure was attained because laboratory analyses of the final rinsate were below the Protective Concentration Levels for these constituents.

The TCEQ has completed a review of the above-stated report. Based on our review, the TCEQ cannot approve the report at this time. A list of the comments or deficiencies is as follows:

1. The report did not specify the final disposition of Building 40. Please provide information whether Building 40 was demolished or whether it will be retained as a complete structure. Please provide the future use of Building 40 if retained as complete structure. If Building 40 was demolished, provide information whether disposal was conducted on-site or off-site. Provide manifests if disposed off-site.

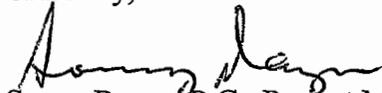
2. Verification sampling consisted only of testing the final rinsate for cadmium and lead. According to the report, metals, Volatile Organic Compounds (VOCs), SVOCs and PCBs were stored at Building 40. The TCEQ requires analytical tests of the final rinsate for all of these constituents. Please prepare a written response to each comment or deficiency by referencing the assigned comment number. An original and one copy of the written response to these comments or deficiencies must be submitted to the TCEQ at the letterhead address using mail code number

LTC Shirley
February 23, 2004
Page 2

MC-127. An additional copy should be submitted to the TCEQ Region 13 Office in San Antonio. Your response must be received within 60 days from the date of this letter. The facility name, location and the solid waste registration number should be included in your response.

Please call me at 512.239-2371 or email me at srayos@tceq.state.tx.us if you need additional information or wish to discuss the content of this letter or the due date. Thank you for your cooperation in this matter.

Sincerely,



Sonny Rayos, P.G., Project Manager
Team I, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

cc: Mr. Greg Lyssy, U.S. EPA Region 6, 1445 Ross Ave (6SF-LT), Dallas, TX 75202-2733
Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX
78754
Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX

→ TCEQ
BLOS 40

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 5, 2004

LTC Jason D. Shirley
Installation Manager
Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, TX 78015-4800

Re: Camp Stanley Storage Activity, Boerne, TX;
TCEQ SWR No. 69026;
Solid Waste Management Unit (SWMU) Building 40;
SWMU-40 - Approval of closure report

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the report entitled *Building 40 Container Storage Area Closure Report* dated September 2003. The report was submitted with your letter dated September 26, 2003 and received by the TCEQ on October 7, 2003. The report indicated that closure activities have been completed according to the TCEQ Risk Reduction Standard (RRS) No. 1 pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S.

In order to attain RRS No. 1, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated from affected media (i.e., soil, surface water, groundwater, air) to naturally occurring background levels or the Practical Quantitation Limits (PQL), provided that the person demonstrates that lower quantitation limits are not possible when PQLs are greater than background.

The TCEQ has completed a review of the final report. Based on the information contained in the report, it appears that closure of SWMU Building 40 attained RRS No. 1. SWMU 40 is released from deed recordation and post-closure care requirements.

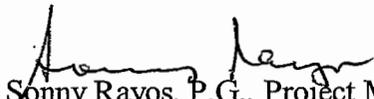
Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual closure fails to comply with these requirements, the burden remains upon Camp Stanley Storage Activity to take any necessary and authorized action to correct such conditions.

LTC Shirley
January 5, 2004
Page 2

A TCEQ Region 13 San Antonio field inspector may review your final closure report and conduct a closure inspection of the site.

Questions concerning this letter should be directed to my attention at (512) 239-2371 or email me at srayos@tceq.state.tx.us. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TCEQ Region 13 Office in San Antonio. The TCEQ Solid Waste Registration No. 69026 should be referenced in all submittals.

Sincerely,


Sonny Rayos, P.G., Project Manager
Team I, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

cc: Mr. Greg Lyssy, U.S. EPA Region 6, 1445 Ross Ave (6SF-LT), Dallas, TX 75202-2733
Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX
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