

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 10, 2005

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

Re: Solid Waste Management Unit B-29 - Request for Additional Information;
Camp Stanley Storage Activity, Boerne, TX;
TCEQ SWR No. 69026;
EPA ID No. TX2210020739

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the report entitled *Final Solid Waste Management Unit B-29* dated February 2005. Solid Waste Management Unit (SWMU) B-29 was a former quarry that was used for disposal of miscellaneous solid wastes, munitions and construction debris. Closure activities consisted of removal and disposal of wastes and collection of confirmation sampling to document attainment of risk reduction standard objective. The report concluded that the closure of SWMU B-29 was performed according to Risk Reduction Standard (RRS) No. 1.

The TCEQ has completed a review of the above-stated report. Based on the information contained in the report, TCEQ cannot approve, at this time, a RRS No. 1 closure. The TCEQ requests Camp Stanley to elaborate on the treatment method wherein B-29 materials (classified as hazardous waste) were treated *in-situ* with agricultural grade phosphate. This method, as the report states, reduces the leachable metal concentration to Class 2 non-hazardous waste levels. Please provide the TCEQ with the following information: (1) the full description of the actual method itself and whether this method is listed in "Table 1 - Technology Codes and Description of Technology-Based Standards" of 40 Code of Federal Regulations §268, (2) the laboratory analytical results that shows that the Universal Treatment Standards (§268.48) were met following treatment and prior to disposal as non-hazardous waste, and (3) the Area of Contamination concept and how this concept applied to the remediation of B-29 waste materials.

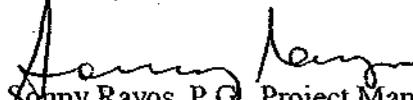
LTC Shirley
June 10, 2005
Page 2

Please prepare a written response to the above-stated request for additional information. An original and one copy of your written response must be submitted to the TCEQ at the letterhead address using mail code number MC-127. An additional copy should be submitted to the TCEQ Region 13 in San Antonio. Your response must be received within 90 days from the date of this letter.

To document compliance with the Texas Professional Geoscience Act, the Remediation Division will not review reports and documents received on or after September 1, 2004 that do not contain the seal of a Texas Professional Geoscientist for geoscience services and work. Reports and documents containing geoscience information that are not stamped with a Texas Professional Geoscience seal will be returned to the submitting party. For further information, please consult the webpage of the Texas Board of Professional Geoscience at <http://www.tbpg.state.tx.us>. Any inquiry regarding what constitute geoscience information or what information requires a Professional Geoscientist seal shall be made to the Board by calling 512.936.4400, in Austin, Texas.

Questions concerning this letter should be directed to my attention at 512.239-2371 or via email at srayos@tceq.state.tx.us.

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