



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 Ross Avenue, Suite 1200

Dallas, Texas 75202-2733

Transmitted via e-mail

February 29, 2012

MEMORANDUM

FROM: *Greg J. Lyssy*
Senior Project Manager
Federal Facilities Section (6PD-F)

TO: Gabriel Moreno-Ferguson
CSSA

CC: Kirk Coulter
TCEQ

RE: **CSSA North Pasture Fencing**

This Memo is written pursuant to our meeting on January 24, 2012, and as a follow-up to the discussions on potentially leaving waste in place at several Solid Waste Management Units (SWMUs) in the North Pasture until such time as the current active range (and associated firing fan) is no longer in use and has been closed. This Memo is in accordance with the final Resource Conservation and Recovery Act (RCRA), Section 3008(h) Administrative Order on Consent (Order) for Camp Stanley Storage Activity (CSSA), Docket No. RCRA-VI 002(h)99-H FY99, dated May 5, 1999.

Specifically, SWMUs B-2, B-8, B-20, B-21, and B-24 will be investigated, remediated, and closed when the active firing range is closed. The rationale for this decision is pursuant to the fact that these SWMUs are located within the active firing range fan, and even if they are investigated and remediated now, they will require further investigation when the active range is closed, due to the potential of re-contamination from the active firing range.

In order to ensure the safety of personnel at CSSA, it is recommended that these areas be fenced off to prevent any accidental exposure.

It is also recommended that an ecological risk assessment be conducted, where the waste is remaining in place, on wildlife species that are being harvested, to ensure that there are not any potential exposures above acceptable risk levels.

It should also be noted that groundwater monitoring network in the North Pasture will continue to be required as long as the Order is in place and there are COCs in the groundwater.

If CSSA, or your technical consultants, have any questions regarding this Memo, please do not hesitate to call me at 214.665.8317, or I may be contacted via e-mail at lyssy.gregory@epa.gov.