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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 8, 2003

Mr. Brian Murphy
Camp Stanley Storage Activity
Attention: Environmental Office
25800 Ralph Fair Road
Boerne, TX 78015-4800

Re: Camp Stanley Storage Activity (CSSA), Boerne, TX;
TCEQ SWR No. 69026;
Site Inspection and Visit on April 29, 2003

Dear Mr. Murphy:

Attached please find a copy of the InterOffice Memorandum concerning the site inspection and visit at Camp Stanley on April 29, 2003. The Texas Commission on Environmental Quality (TCEQ) Corrective Action Section thank you for the successful site inspection and facility overview of past, current and future remediation and corrective actions at Camp Stanley.

As discussed with you during the meeting and during a telephone conversation on May 6th, the TCEQ requires the screening for perchlorates for federal facility sites that may have potentially managed perchlorate. Consequently, the CSSA has to comply with this TCEQ directive. As further discussed with you, it is preferred that sampling for perchlorates in off-site drinking water wells should be conducted, at the earliest, because of potential human-health risk exposure. This should be followed by on-site well sampling, if necessary. Please respond within 30 days of the date of this letter with a schedule to sample off-site wells for perchlorates.

I look forward to working with you, your staff, Mr. Greg Lyssy of U.S. EPA Region 6 and the TCEQ Region 13 Office staff. Please call me at (512) 239-2371 or email me at srayos@tceq.state.tx.us if you wish to discuss or if you have questions concerning this letter. Please use Mail Code MC-127 when responding by mail.

Sincerely,

A handwritten signature in black ink, appearing to read "Sonny Rayos".

Sonny Rayos, Project Manager
Team I, Corrective Action Section
Remediation Division

Attachment: (1) InterOffice Memorandum to File

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

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: Central Records Files (MC - 199) **Date:** April 30, 2003

Camp Stanley Storage Activity
Boerne, TX
Solid Waste Registration No. 69026

Thru: *DB* Mr. Don Boothby, Supervisor
Team I, Corrective Action Section, Remediation Division

From: *AN* Mr. Sonny Rayos, Project Manager
Team I, Corrective Action Section, Remediation Division

Subject: Site inspection at Camp Stanley Storage Activity located at 25800 Ralph Fair Road, Boerne, TX

A site inspection and visit was conducted at Camp Stanley Storage Activity on April 29, 2003. A meeting and site orientation commenced at 10:30 a.m. The following were in attendance: Mr. Greg Lyssy, representing U.S. Environmental Protection Agency Region 6, Mr. Brian Murphy, the Environmental Program Manager for Camp Stanley, LTC Jason Shirley, Commander - Camp Stanley and Mr. Jeff Aston, Camp Stanley Army Corps of Engineer Liaison. Representing the TCEQ are: Ms. Abigail Power and Mr. Jorge Salazar, TCEQ Region 13. Mr. Sonny Rayos represented the TCEQ Corrective Action Section (CAS). A Compliance Evaluation Investigation of Camp Stanley is being conducted by the TCEQ Region 13 staves concurrent with this site visit.

The site consists of 41 Solid Waste Management Units, 38 Areas of Concern (AOC) and five Rifle Management Units. Of these, work has been conducted at 63 sites, 18 sites are scheduled for closure and 42 sites require additional investigation to delineate contamination and/or contaminant removal action to attain clean-closure. AOC-55 is a recently identified AOC adjacent to Salado Creek which was exposed as a result of the 500-year flood in July 2002. Current investigation at AOC-55 identifies approximately 35,000 cubic yards of Class 2 soil including unexploded ordnance. All environmental cleanup are according to a 3008H Order issued by the U.S. EPA.

Geology is complex with groundwater contaminant migration highly influenced by the karst limestone formation and exacerbated by faults and fractures. Typical monitor well is installed at the Lower Glen Rose about 325 feet bgs. Two groundwater chlorinated solvent contaminant plumes exist. These plumes has since migrated approximately one-half mile off-site. The central plume extends off-site onto the Jackson Woods subdivision and extends west onto the storage business on IH-10 frontage road. The southwest plume has migrated off-site south and southwest of the facility boundaries impacting residential and public supply wells. Currently, Granular Activated Carbon are installed at two public drinking water supply wells and at five residential wells. A response action plan is in place which provides bottled water immediately when laboratory analyses

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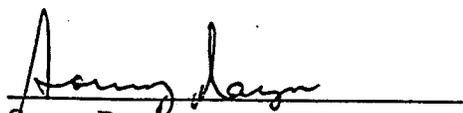
of groundwater contamination (i.e., chlorinated solvents - PCE, TCE and DCE) is detected at 0.9 of the drinking water standard (e.g., approximately 4.5 ppb for trichloroethene). Also, monthly sampling of the water well is conducted when chlorinated solvent concentration approaches 0.8 of the drinking water Maximum Concentration Limit.

Camp Stanley has organized open houses to serve as the community outreach program. They also publish Fact Sheets regarding the on-site and off-site remediation. These activities are coordinated with neighborhood organizations, private well owners, local government (e.g., Alamo Area Council of Government and City of Fair Oaks City Council), locally elected politicians (Congressional, State and Local), private well owners, homeowner associations and Bexas Metropolitan and Fair Oaks Water Utilities. Other community relations include the publishing of a compendium of environmental encyclopedia for Camp Stanley. This is available for public viewing at www.stanley.army.mil.

Camp Stanley representatives have indicated that the preferred corrective action is removal and decontamination. Contamination and waste materials from SWMUB-3, for example, were removed and managed off-site to an authorized landfill. On-site remediation include soil and groundwater vapor extraction in AOC-65 and/or Building 90.

The CAS staff had requested information concerning the following: 1) closure activities which are all currently being conducted according to the Risk Reduction Standards, 2) information concerning perchlorate investigations, 3) management and disposal of soil cuttings from Building 90. In brief, Camp Stanley representatives indicated that closure activities were grandfathered according to the Risk Reduction, limited testing for perchlorates were conducted at the TPDES Outfall No.2 and soil cuttings were eligible for Contained-In Policy determination. The CAS recommended further discussions regarding the perchlorates issue.

After the site orientation and meeting, a RCRA Facility Investigation of the SWMUs and AOCs were conducted by Mr. Salazar (with the CAS staff witnessing this activity). On-site and off-site monitor well locations were evaluated. Building 90 and/or AOC 65 was inspected last due to restrictions. The meeting and inspection concluded at 5:30 p.m.



Sonny Rayos

cc: Waste Program Manager, TCEQ Region 13 Office, San Antonio