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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 20, 2003

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

Re: Camp Stanley Storage Activity, Boerne, TX;
TCEQ Solid Waste Registration (SWR) No. 69026;
Solid Waste Management Unit (SWMU) B-10;
Request for additional information

Dear Mr. Murphy:

The Texas Commission on Environmental Quality (TCEQ) has received the report entitled *Final Solid Waste Management Unit B-10 RCRA Facility Investigation Report* dated May 2003. The report described the excavation, removal, decontamination and closure of SWMU B-10 to attain Risk Reduction Standard (RRS) No. 1 cleanup levels pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S.

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 highest concentration of zinc and lead were found at soil borings B-10-TrBott-17 and B-10-TrBott-16 at 1,100.5 mg/kg and 2,343 mg/kg, respectively. According to the report, because all waste material and soil were removed to the bedrock contact, the elevated concentrations at these two locations were considered "suspect." CSSA elected to resample and collect samples at 3 feet depth and at 6.5 feet depth at these locations. The resample results indicated 0.63 and 1.27 mg/kg zinc and lead, respectively. This procedure is out of the ordinary. In any cleanup activity, the contamination is effectively removed or excavated and a verification sample collected after the removal action. Because no actual removal of the 1,100.5 mg/kg and 2,343 mg/kg zinc and lead, respectively was conducted, the TCEQ cannot approve a RRS No. 1.
2. As specified in Section 2.1.7. and reiterated in Section 2.2.7. of the submitted report, no groundwater investigation was conducted during the closure of SWMU B-10. Groundwater investigation is not required according to the approved workplan. Because the groundwater resources was not investigated, the TCEQ can only approve (if applicable) the attainment of cleanup

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levels for soil medium. To demonstrate the attainment of cleanup levels for RRS No. 1, 30 TAC §335.554(e) requires that collection and analysis of samples from the media of concern (i.e., soil and groundwater).

Further to the issue of no groundwater investigation, the TCEQ has a concern on how CSSA will determine whether SWMU B-10 has released or releasing or contributing to any groundwater contamination if no groundwater investigation was conducted at near SWMU B-10.

3. Two buried drums with one drum labeled "perchloroethylene" was found at or near sample designated as B10-DA-Bottom 1 (please refer to Figure B10-7). Figure B10-8 specifies the location of all samples and verification samples. The TCEQ compared Figures B10-7 and B10-8; this comparison showed that the nearest verification sample for the buried drums was sample location 10. Sample 10 appears to be at least 15 feet to the south-southeast of the buried drums and therefore cannot be used to accurately define that contamination was removed.

4. The final report documents all analytical data in a tabulated manner. The TCEQ requires the submission of all pertinent and actual laboratory analytical reports, laboratory and field QA/QC data and chain of custody information with the report.

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 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, 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