



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

5 September 2003

U - 090 - 03

Mr. Sonny Rayos
Texas Commission on Environmental Quality
Corrective Action Section, Closure Team
P.O. Box 13087 (MC-127)
Austin, TX 78711-3087

Subject: Response to Texas Commission on Environmental Quality
letter dated August 15, 2003, Concerning Solid Waste
Management Unit B-32 Closure, Camp Stanley Storage
Activity, Boerne, Texas

Dear Mr. Rayos:

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Material Command, U.S. Army, is providing this response to a letter from the Texas Commission on Environmental Quality (TCEQ), dated August 15, 2003, concerning the selection of a closure standard for Solid Waste Management Unit (SWMU) B-32.

It has been stated in a previous letter to the TCEQ concerning SWMU B-32, dated May 13, 2003, that although barium, cadmium, chromium, nickel, and zinc are present in limestone at concentrations above Glen Rose background standards, they do not exceed established background soil concentrations and the concentrations are not considered harmful to human health or the environment. A meeting was held on July 17, 2003 between CSSA, TCEQ, and CSSA's contractor, Parsons, to discuss the possibility of closing the site under Risk Reduction Standard 1 (RRS1) based on this reasoning.

The results of this meeting and the future recommendations for the site are included in the August 15, 2003 letter from the TCEQ. The letter states that additional discussions will be pursued with respect to SWMU B-32, and, in addition, the letter suggests closure of the site under RRS2 "in lieu of clean closure."

CSSA appreciates the cooperation and suggestions of the TCEQ in regards to the closure of SWMU B-32. CSSA has previously closed several sites under RRS1 and strives to achieve closure of all eligible sites under RRS1. RRS1 is the most stringent of the closure standards that existed at the time that SWMU B-32 was discovered and registered as a SWMU. Therefore, CSSA would like to provide further justification for RRS1 closure for reconsideration of closure of the site under RRS1.

First, not only do the metals concentrations from the Glen Rose samples fall well below background soil metals concentrations, the concentrations also fall significantly below current Texas Risk Reduction Program (TRRP) Remedy A standards, which have since replaced Risk Reduction Rules that were in place at the time that SWMU B-32 was

established. The table below displays the maximum detected barium, cadmium, chromium, nickel, and zinc concentrations from Glen Rose samples collected at SWMU B-32 and the current applicable TRRP Remedy A standards for each metal.

Metal	Sample ID	Maximum Analytical Result (mg/kg)	TRRP Remedy A Standard* (mg/kg)	CSSA Soil Background (mg/kg)
Barium	RW-B32-SB02 (11.5-12)	31.2	221.92	186
Cadmium	RW-B32-SB03 (3.5-4)	0.33	0.75	3.0
Chromium	RW-B32-SB02 (11.5-12)	13.2	1,200.10	40.2
Nickel	RW-B32-SB01 (8.5-9)	23.6	78.68	35.5
Zinc	RW-B32-SB01 (8.5-9)	59.4	1,180.24	73.2

* The standards presented here are residential PCLs for a 30-acre site (soil to groundwater ingestion standards). Although 0.5-acre standards are also defined in TRRP, and SWMU B-32 is closer to 0.5 acre than 30 acres, the 30-acre standards are more stringent and were chosen for this reason.

Secondly, comparisons of results from what are considered Glen Rose samples collected at SWMU B-32 are somewhat ambiguous. Although the sample depths designate that the sample material is Glen Rose limestone, soil borings indicated the presence of fill material and interbedded clay lenses at SWMU B-32. The presence of these materials at depths indicative of Glen Rose limestone promotes the possibility that some of the Glen Rose samples may be more appropriately compared to established soil background levels.

Lastly, the soil profile that rests on top of the Glen Rose at SWMU B-32 has higher metals concentrations that are below RRS1 for CSSA soils. Since it is not necessary to remove this material, a source of higher metals concentrations will always be present at the site, regardless of removal of Glen Rose material.

CSSA is respectfully requesting reconsideration for RRS1 closure of SWMU B-32 based on the aforementioned arguments. CSSA believes that the arguments are reasonable for RRS1 closure based on the site conditions.

If you have any further questions or comments, please do not hesitate to contact me at (210) 295-7416.

Sincerely,


 JASON D. SHIRLEY
 Installation Manager

Attachment

cc: Mr. Greg Lyssy
EPA Region 6

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

Ms. Teri DuPriest
Air Force Center for Environmental Excellence

Ms. Julie Burdey
Parsons