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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 8, 2004

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

Re: Camp Stanley Storage Activity, Boerne, TX;
TCEQ SWR No. 69026;
Area of Concern 55;
Request for additional information

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has received the report entitled *Area of Concern 55 RCRA Facility Investigation/Closure Report* dated February 2004. This report was received by the TCEQ on April 9, 2004. The report described the investigation, remediation and cleanup, excavation and removal, and closure of Area of Concern (AOC) 55. The area was uncovered as a waste management unit during the Salado Creek floods of July 2002. AOC 55, based on materials recovered, appears to be a landfill containing incinerator ashes, restaurant/mess hall debris, contaminated soils, ordnance and explosive (OE) scrap, and unexploded ordnance (UXO). The report concluded that Risk Reduction Standard No. 1 was attained.

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 comments or deficiencies is as follows:

1. Test trenches for waste characterization indicated that the presence of incinerator ash. The report also stated that a waste incinerator existed and operated in the general location of AOC-55. The report did not specify whether the ash materials were analyzed for constituents of concern. In addition, the report did not specifically address the special handling and disposal of incinerator ash/ashes, other than the information that 34,020 cubic yards were removed and disposed of at WMI Covel Garden Landfill facility. Please provide the above requested information. Please note that incinerator ash is a waste and is not contaminated media or media and, therefore, could be subject to applicable industrial solid waste regulations or hazardous waste regulations after generation.
2. A total of 699 OE scrap and 20 UXO items were recovered from AOC 55. Please provide how these materials were managed, provide the respective disposal methods and where disposed.
3. The report states on Page 2-11, third paragraph: "To compare the totals-based VOCs, SVOCs and metals results to the TCLP-based waste criteria, a screening value of 20 times the TCLP waste criteria was applied to the total results to identify areas where the TCLP waste criteria may be exceeded." The 20X is a poor determinant of leaching potential of a contaminant; it has to do more with soil textural class, the cation exchange capacity, presence of organic matter, to name a few. The 20X is reliable only when the total concentration is less than the TCLP compliance concentration. Please refrain from using this criterion.

4. AOC 55 area landfill was assumed to have been in operation between 1920 and 1950 based on aerial photographs and on dates found on bottles and plates recovered from the landfill. Please provide "readable" copies or originals of the aerial photos to the TCEQ.

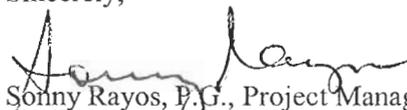
5. The report indicated exceedances of lead and zinc in confirmation samples. For statistical evaluation, Upper Confidence Limit was calculated using the Shapiro-Wilke Test using the software ProUCL developed by the U.S. EPA. Based on a 95% H-UCL for lead and 95% UCL for zinc, the report concluded the attainment of Risk Reduction Standard No. 1. In 30 Texas Administrative Code Section 335.553(d)(3), it states that other statistical methods appropriate for the distribution of the data may be used but is, however, subject to the approval by the executive director. The TCEQ request that Camp Stanley follow the requirement of the stated regulation. Please submit for approval the statistical methodology used. In addition, please submit all pertinent raw data used in the statistical analyses in order for the TCEQ to validate Camp Stanley's statistical evaluation and conclusion.

6. The statistical evaluation portion of the report will be review by a subject specialist. The results of the subject specialist's review will be submitted to the attention of Camp Stanley's under a separate TCEQ letter.

Please prepare a written response to each comment or deficiency by referencing the assigned 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, 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