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R. B. "Ralph" Marquez, *Commissioner*
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Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 19, 2005

Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, TX 78015-4800
Attention: Lieutenant Colonel Jason Shirley

Re: Three-Tiered Long Term Monitoring Network Optimization Evaluation - Approval with modification
Camp Stanley Storage Activity, Boerne, TX
TCEQ SWR No. 69026
EPA ID No. TX2210020739

Dear LTC Shirley:

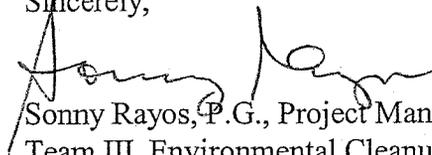
The Texas Commission on Environmental Quality (TCEQ) has reviewed the report entitled *Final Three Tiered Long Term Monitoring Network Optimization Evaluation* received by the TCEQ on May 19, 2005. On November 8, 2005, the TCEQ approved your request to implement the Long Term Monitoring Optimization (LTMO) program; however, implementation of the LTMO was approved only for on-site monitor wells and only for the last calendar quarter 2005 groundwater monitoring. As further stated in the November 8, 2005 TCEQ letter, the approval may be modified upon completion of the review of the above-stated report.

The TCEQ Technical Support Section reviewed and provided comments regarding the above-stated report. The recommendations and conclusions of the TCEQ review are provided as an Enclosure to this letter. As stated in the InterOffice Memorandum, the four recommendations are acceptable. The TCEQ Technical Support Section has reservations concerning the fifth recommendation (i.e., reduced off-site monitoring) - this appears to be in agreement with the previous requirement of the TCEQ Environmental Cleanup Section letter dated November 8, 2005. Consequently, the TCEQ requires Camp Stanley to continue monitoring the off-site wells according to standard protocol currently in effect while implementing the four other recommendations. The TCEQ will monitor the LTMO groundwater sampling results at the southwest portion (area near the off-site contaminant release) of the facility; should a need to modify or invalidate the LTMO at this area arise, the TCEQ will inform you in a separate letter.

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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.

Sincerely,



Sonny Rayos, P.G., Project Manager
Team III, Environmental Cleanup II
Remediation Division
Texas Commission on Environmental Quality

Enclosure: InterOffice Memorandum from Mr. Greg Tipple

cc: Ms. Glare Sanchez, Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, TX
78015-4800
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: Sonny Rayos, Environmental Cleanup
Section II, Team 3, Remediation
Division

Date: December 14, 2005

Thru: Chet Clarke, Section Manager, Technical Support Section, Remediation Division

From: <sup>GL
12-14-05</sup> Greg Tipple, Technical Specialist, Technical Support Section, Remediation
Division

Subject: Three-Tiered Long-Term Monitoring Network Optimization Evaluation, May
2005, Camp Stanley Storage Activity, Bexar County

As requested, I have reviewed the document titled *Three-Tiered Long Term Monitoring Network Optimization Evaluation* that is dated May 2005 and that pertains to Camp Stanley Storage Activity (CSSA). CSSA consists of 4,004 acres and is located approximately 19 miles northwest of downtown San Antonio in the general vicinity of Boerne, Texas. Primary activities at CSSA include the receipt, storage, and issuance of ordnance material as well as quality assurance testing and maintenance of military weapons and ammunition. While 39 solid waste management units (SWMUs) and 40 areas of concern (AOCs) have been identified at the facility, only SWMUs B-3 and O-1 and AOC-65 are considered as potential sources for elevated concentrations of tetrachloroethene, trichloroethene, dichloroethene, and other chemicals of concern within the Lower Glen Rose limestone member of the middle Trinity Aquifer. The reviewed document describes qualitative, temporal statistical, and spatial statistical evaluations that were performed in order to identify potential opportunities for streamlining while still maintaining an effective groundwater monitoring program at the CSSA facility.

This groundwater monitoring optimization study for the CSSA facility recommends the following:

1. that the sampling frequency for the 40 on-post monitoring wells be reduced from quarterly to a biennial, annual, and semi-annual schedule for 13, 11, and 16 on-post wells, respectively;
2. that the AOC-65 piezometers be removed from the monitoring program while the sampling frequency for the 2 AOC-65 monitoring wells be reduced from quarterly to after significant rainfall events;

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3. that the sampling frequency for the 4 Westbay monitoring wells, with a total of 64 sampling points, be reduced from monthly and after significant rainfall events to semi-annual;
4. that 11 additional on-post monitoring wells be constructed to better determine groundwater levels and/or to further delineate groundwater PCLE zone boundaries; and
5. that the monitoring frequency for the 44 off-post monitoring wells be reduced from annual for 18 wells and quarterly for 26 wells to biennial for 20 wells, annual for 17 wells, and quarterly for 7 wells.

In my evaluation, the groundwater monitoring optimization report provides adequate documentation and rationale to support the first four recommendations stated above. However, I do have concern regarding the fifth recommendation. The document indicates that the distance to potential receptor exposure points and the groundwater seepage velocity are primary factors that should be considered when designing a groundwater monitoring network. The report indicates that the land use surrounding the CSSA facility is primarily residential or is used for ranching. In my view, the report does not adequately discuss how the proximity of potential receptors and the groundwater transport velocity were actually taken into account when designing the proposed revision to the sampling frequencies for the off-post monitoring wells. The TCEQ, of course, has a heightened concern to make sure that the groundwater monitoring program will adequately protect off-site receptors. Therefore, I recommend that you carefully consider whether the final recommendation listed above should be approved.