



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

18 October 2007

U-059-08

Mr. Sonny Rayos, P.G., Project Manager  
Texas Commission on Environmental Quality  
Team I, Corrective Action Section  
Remediation Division  
PO Box 13087  
Austin, TX 78711-3087

Subject: Area of Concern (AOC)-55 Request for Approval of Closure,  
Camp Stanley Storage Activity, Boerne, Texas, TCEQ SWR No.  
69026, EPA ID No. TX2210020739

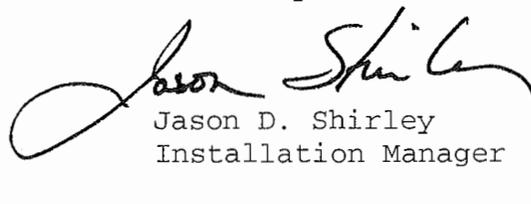
Dear Mr. Rayos:

The Camp Stanley Storage Activity (CSSA), McAlester Army Ammunition Plant, U.S. Army Field Support Command, Army Materiel Command, U.S. Army, is submitting this letter to request the Texas Commission on Environmental Quality's (TCEQ's) approval to close the AOC-55 site. The Closure Report and original request for approval were submitted to TCEQ in April 2003. Subsequently, there was correspondence and meetings regarding AOC-55 and a related issue, CSSA's Waste Management Plan; however, the issue of AOC-55 closure has not been resolved. A summary of these communications is provided below, and copies of the referenced letters are attached.

- April 5, 2003: CSSA submits AOC-55 Closure Report and requests TCEQ's approval to close the unit;
- November 18, 2004: TCEQ requests additional information concerning the closure of AOC-55;
- December 28, 2004: CSSA submits requested information;
- March 24, 2005: TCEQ requests that the RFI and Interim Measures Waste Management Plan be re-written and defers decision on AOC-55 closure pending consultation with the TCEQ Region 13 Office San Antonio;
- May 19, 2006: CSSA submits revised RFI and Interim Measures Waste Management Plan; and
- August 28, 2006: TCEQ approves revised RFI and Interim Measures Waste Management Plan.

CSSA appreciates your time and attention concerning this matter. If you need further information, please contact Glaré Sanchez, CSSA Environmental Program Manager, at (210) 698-5208.

Sincerely,

  
Jason D. Shirley  
Installation Manager

Attachment

cc: Ms. Glaré Sanchez  
CSSA

Mr. Greg Lyssy  
EPA Region 6

Mr. Jorge Salazar  
TCEQ Region 13

Ms. Julie Burdey  
Parsons



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

April 5, 2003

U-054-04

Mr. Sonny Rayos  
Texas Commission on Environmental Quality  
Industrial and Hazardous Waste Section  
PO Box 13087 (MC-127)  
Austin, TX 78711-3087

Subject: Final RCRA Facility Investigation (RFI) Closure Report for  
Area of Concern 55 (AOC-55), Camp Stanley Storage Activity,  
Boerne, Texas, EPA Identification Number: TXD2210020739  
US EPA Docket Number: RCRA-VI 002(h)99-H FY99

Dear Mr. Rayos:

Attached is the Final RFI Closure Report for AOC-55. The AOC-55 site is not or does not appear on CSSA's Notice of Registration. However, it is part of the Administrative Order on Consent Order issued to CSSA pursuant to §3008(h) of RCRA with the EPA.

If you have any questions or comments, please feel free to contact me at (210) 295-7416.

Sincerely,

  
Jason D. Shirley  
Installation Manager

Attachment

cc: Mr. Greg Lyssy  
EPA Region 6 (ltr)  
Mr. Jorge Salazar  
TCEQ Region 13 (ltr)  
Mr. Kent Grubb  
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge  
Advocate (ltr)  
Ms. Neyda Gutierrez  
Air Force Center for Environmental Excellence (ltr)  
Ms. Julie Burdey  
Parsons (ltr)

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 18, 2004

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

Re: Letter dated August 12, 2004 regarding additional information to document closure of Area of Concern (AOC)-55 - Additional Information Requested;  
Camp Stanley Storage Activity, Boerne, TX;  
TCEQ SWR No. 69026

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) received your letter dated August 12, 2004. Your letter responds to TCEQ letter dated July 8, 2004 which requested CSSA for additional information concerning the closure of AOC-55. Our review indicates that your letter responded to the each of the request for additional information, as follows:

Item No. 1 - According to your letter, "the waste (incinerator ash) is not a listed hazardous waste because the waste was believe to be originally generated prior to the enactment of Resource Conservation and Recovery Act (RCRA)." Waste disposed of prior to the implementation of hazardous waste regulations as promulgated under RCRA are generally known as "pre-RCRA" wastes. If these "pre-RCRA" wastes are exhumed during closure or remediation activities, a "newly" generated waste is generated. If this "newly" generated waste meets the definition of hazardous waste (refer to 40 Code of Federal Regulations (CFR) §261.3), then it is subject to all applicable hazardous waste regulations, including Land Disposal Restrictions of 40 CFR §268.

In the response to Item No. 1, you also indicated that "CSSA is not classified as an industrial facility, therefore, industrial solid waste classification, reporting, etc. are not applicable to any non-hazardous waste generated at the facility." Please note that CSSA is subject to the general prohibitions as stated in 30 Texas Administrative Code (TAC) §335.4 which states that no person may cause, suffer, allow, or permit the collection, handling, storage, processing, or disposal of industrial solid waste or municipal hazardous waste in such a manner so as to cause: 1) the discharge or imminent threat of discharge of industrial solid waste or municipal hazardous waste into or adjacent to the wastes n the state, 2) the creation and maintenance of nuisance or 3) the endangerment of public health and welfare.

As a consequence of the above discussion, the issue of pre-RCRA wastes should be further discussed during the review of the report entitled *RFI and Interim Measures Waste Management Plan August 2002*.

The TCEQ requires CSSA to resubmit all laboratory analyses pertaining to the sampling and analyses of the incinerator ash and/or the incinerator ash-soil mix. Information concerning the location and depth of sampling, sampling and field notes, and chain of custody shall be submitted to the TCEQ for review.

LTC Shirley  
November 18, 2004  
Page 2

Item No. 2 - CSSA has satisfactorily answered this concern.

Item No. 3 - Your discussion regarding 20X Toxicity Characteristic Leaching Procedure (TCLP) issue is well taken, however, additional discussion of this issue will be discussed during the review of the report entitled *RFI and Interim Measures Waste Management Plan August 2002*.

Item No. 4 - Aerial photographs were attached with your letter; CSSA has satisfactorily provided the requested materials.

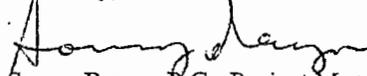
Item No. 5 and 6 - The TCEQ subject matter specialist on statistics has reviewed the statistical evaluation and has no additional concern regarding the statistical method used.

Please prepare a written response to the additional information requested in Item No. 1, above. An original and one copy of the written response 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 on or before December 27, 2004. The facility name, location and identification number(s) in the TCEQ reference line above should be included in your response.

To document compliance with the Texas Professional Geoscience Act, the Remediation Division will not review reports and documents received on or after September 1, 2004 that do not contain the seal of a Texas Professional Geoscientist for geoscience services and work. Reports and documents containing geoscience information that are not stamped with a Texas Professional Geoscience seal will be returned to the submitting party. For further information, please consult the webpage of the Texas Board of Professional Geoscience at <http://www.tbpg.state.tx.us>. Any inquiry regarding what constitute geoscience information or what information requires a Professional Geoscientist seal shall be made to the Board by calling 512.936.4400, in Austin, Texas. Examples of geology work which requires a Professional Geologist seal are provided in the link: <http://www.tnrcc.state.tx.us/permitting/remed/techsupp/PGReports.pdf>.

Please contact me at 512.239.2371 or at [srayos@tceq.state.tx.us](mailto: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,



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  
Mr. Brian Murphy, Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, TX 78015-4800  
Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX 78754  
Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX



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

28 December 2004

U-012-05

Mr. Sonny Rayos  
Texas Commission on Environmental Quality  
Industrial and Hazardous Waste Section  
PO Box 13087 (MC-127)  
Austin, TX 78711-3087

Subject: Response to Texas Commission on Environmental Quality  
(TCEQ) Request for Additional Information on Area of  
Concern (AOC)-55, Camp Stanley Storage Activity, Boerne,  
Texas, TCEQ Industrial Solid Waste Registration #69026  
EPA Identification Number TX2210020739

Dear Mr. Rayos:

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Materiel Command, U.S. Army is providing additional information in response to your letter dated November 18, 2004.

Your November 18, 2004 letter provided a list of information, which the TCEQ requires CSSA to submit. CSSA is responding to your letter to provide all laboratory analysis, field notes, and a chain of custody pertaining to the sampling and analysis of the ash-impacted media generated at AOC-55 as an attachment. Information regarding the location and depths of the characterization samples are provided below. Figures and photos are provided as attachments.

**Background**

AOC-55 consists of potential contaminated source areas associated with landfilling of non-hazardous waste. These areas have been identified by the presence of trash exposed during a previous (July, 2002) flooding event.

The site was used as a landfill and is located south of Tenberg Drive and east of Salado Creek. It is approximately 3.6 acres in size and contained approximately 35,000 cubic yards of impacted media/waste material. Initial site surveys indicated that the waste consisted of ash material and a minor amount of metal debris. CSSA conducted a removal action at the unit, which involved the excavation and disposal of the waste material.

**Test Trenches**

Test trenches were excavated on October 29 to 31, 2002 to confirm the results of the geophysical survey, characterize the waste thickness, and evaluate the material present. A total of 6 trenches were excavated in areas of geophysical anomalies identified in the EM data. The locations of the trenches are depicted on Figure 1.

Trenching subcontract services were provided by Eagle Construction and Environmental Services of Cibolo, Texas. Kyle Caskey, Senior Construction Manager for Parsons, provided contractor oversight during the test trenching operations. Additionally, A UXO Site Supervisor and technician were available to perform UXO avoidance and identification efforts.

The test trenches were excavated using a trackhoe. The trenches were oriented east to west across the suspected disposal area identified in the geophysical results. Trenches were excavated until bedrock was encountered resulting in trenches that were approximately seven to ten feet deep. Following completion of the trenching activities, samples for soil characterization were collected and the excavated material was placed back into the trenches.

The material encountered in the test trenches included ash that appeared to be generated from an incinerator operation within the AOC-55 area. The landfill also contained bottles that appeared to be waste from the on base cafeteria. These bottles included numerous ketchup bottles, Worcestershire Sauce bottles, discarded coke bottles and other types of bottles that were unidentifiable. Also found were several metal water pitchers and broken China plates. One of the broken China plates found was dated 1915. The time of the landfill operation is unknown, but is thought to be between 1920 till 1950 based on dates found on bottles, plates and aerial photos.

In addition, one 155mm projectile casing and two 75mm projectile casings were encountered on the surface. All rounds were identified by the on-site EOD personnel and were moved to a safe area and flagged for future destruction. It appears these items were placed in this area after the AOC-55 landfill was no longer in use.

Photos of the trenching operation are attached.

#### **Waste Characterization Sampling**

Waste characterization in the trenches was based on a composite soil sample from the top to the bottom of each trench (approximately 2 feet in depth). This composite sample was analyzed for VOCs, SVOCs, and explosives.

#### **Soil Characterization Sampling**

On October 30, 2002 six samples collected from the material excavated from the test trenches. The samples were submitted to APPL in Fresno, California, and analyzed for totals analysis VOCs, SVOCs, total metals, and Toxicity Characteristics Leaching Procedure (TCLP) metals (Laboratory Package ID # 39832). The sample results were used to determine the appropriate contaminants of concern for the site and to establish a waste profile to determine landfill requirements in preparation for the removal actions. Analytical requirements for the post-excavation confirmation samples will be based on the contaminants of concern identified for AOC-55.

Soil samples AOC55-SW1 through AOC55-SW5 were collected from the material excavated from trenches SW1 through SW5 in the southwestern

quadrant. Composite samples of the excavated material were collected for the SVOC and metals analysis. The composite sampling procedure consisted of collecting aliquots of soil material at 4 to 5 locations from the trench location, combining and mixing the aliquots, then filling a sample jar with the soil mixture. A grab sample was collected for VOC analysis and was collected at the approximate middle of each trench alignment and at a depth of approximately 2 foot into the soil material.

Sample AOC55-SE1 was collected from the three smaller trenches excavated in the southeast quadrant. The SVOC and metals samples were collected by compositing equal amounts of material from the soil material at the three trenches. The VOC grab sample was collected from at Trench SE1a.

The soil samples were initially analyzed for VOCs, SVOCs, and total metals. These soil sample results were compared to the USEPA's hazardous waste criteria and the TCEQ's Class 1 waste criteria to assess possible waste classification. To compare the totals-basis VOCs, SVOCs, and metals results to the TCLP-basis waste criteria, a screening value of 20 times the TCLP waste criteria was used to identify areas where the waste criteria may be exceeded. Samples that exceeded this conservative screening value for a particular analyte were then analyzed for that analyte using the TCLP extraction procedure. Following this screening technique, all soil samples except AOC55-SW1 were found to contain total lead concentration above the screening level, and as a result, all soil samples were analyzed for TCLP lead. In addition, sample AOC55-SE1 exhibited an elevated cadmium concentration that was well below the 20 times screening level, however, the sample was analyzed for TCLP cadmium to verify that the waste criteria were not exceeded for this parameter.

Laboratory results of the sample indicate that lead is present at elevated concentrations in all samples. Cadmium was detected in the sample from Trench SE1 at an elevated concentration. Three VOC constituents and eight SVOC constituents were detected in the samples at concentrations below the laboratory reporting limits. The VOC constituents present were methylene chloride, naphthalene, and toluene. The SVOC constituents detected in the samples includes: benzo (a) anthracene; benzo (a) pyrene; benzo (b) fluoranthene; benzo (g,h,i) perylene; chrysene; fluoranthene; indeno (1,2,3-cd) pyrene; phenanthrene; and, pyrene.

The TCLP analysis for lead in all collected sampled and cadmium in AOC55-SE1 indicated the material meets Class 2 non-hazardous waste criteria as specified in State of Texas 30 Texas Administrative Code (TAC) Chapter 335, Subchapter R (30 TAC 335.506).

Twenty additional waste characterization samples were collected from AOC-55 on February 27, 2003 at locations show on Figure 1. Samples AOC 55-SW6 through AOC 55-SW25 were collected in the same manner as the previous waste characterization samples. The samples were submitted to APPL, Inc. (Laboratory Package ID # 40846) for analysis of TCLP lead, cadmium in order to provide proper waste

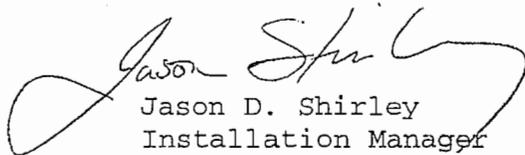
characterization of the remaining soils within AOC-55. Additionally, ten of the samples collected for waste classification on February 27, 2003 were submitted to DHL, Inc. (Laboratory Package ID # 0302145) for explosives analysis (USEPA method 8330). Results of analysis indicate that the material met State of Texas non-hazardous Class 2 criteria.

Summary

AOC-55 contained approximately 35,000 cubic yards of class 2 non-hazardous impacted media/waste materials. The waste characterization analysis indicated that there were no explosives, SVOCs, or VOCs noted as chemicals of concern.

If you have any questions regarding this information, please feel free to contact me at (210) 295-7416 or Mr. Rod Hudson at (210) 221-2373.

Sincerely,

  
Jason D. Shirley  
Installation Manager

Attachments

cc: Mr. Greg Lyssy  
EPA Region 6

Mr. Sonny Rayos  
TCEQ, Corrective Action

Mr. Richard Garcia  
TCEQ, Region 13

Mr. Stan Citron  
U.S. Army, Army Materiel Command, Command Counsel, General Law  
Division (AMCCC-G)

Mr. Rod Hudson  
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge  
Advocate

Mr. Teresa DuPriest  
Air Force Center for Environmental Excellence

Ms. Julie Burdey  
Parsons

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 24, 2005

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

Re: Letter dated December 28, 2004 regarding additional information to document closure of Area of Concern (AOC)-55 - Comments;  
Camp Stanley Storage Activity, Boerne, TX;  
TCEQ SWR No. 69026;  
EPA ID No. TX2210020739

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) received your letter dated December 28, 2004. Your letter responds to the TCEQ letter dated November 18, 2004 which requested CSSA for additional information concerning the closure of AOC-55. In particular, the TCEQ letter requested CSSA to submit laboratory analyses pertaining to the sampling and analyses of the incinerator ash, the incinerator ash-soil mix and contaminated soil collected from AOC-55. Also required for submission are: information on location and depth of sampling, sampling and field notes, and chain of custody.

Our review of the information provided in your letter indicate that ash materials were found at AOC-55 from what appears to be an incinerator which operated within AOC-55 area. Despite the finding of ash wastes, samples collected for waste characterization consisted of composite soil samples collected from top and bottom of each test trenches. Grab sample was collected for VOC analysis at approximately two foot deep into the soil material in the trench. The sample chain of custody information identified the samples as soil medium and one water sample. This appears to be an incorrect waste characterization; the soil analyses are not representative of ash wastes and vice versa. In the future, the TCEQ requires CSSA to collect representative samples of the materials, in question, for waste analyses

The TCEQ previously commented on "pre-RCRA" wastes in its letter dated November 18, 2004. In summary, the TCEQ indicated that wastes disposed prior to the implementation of hazardous waste regulations as promulgated under RCRA are generally known as "pre-RCRA" wastes. If these "pre-RCRA" wastes are exhumed during closure or remediation activities, a "newly" generated waste is generated. If this "newly" generated waste meets the definition of hazardous waste (refer to 40 Code of Federal Regulations (CFR) §261.3), then it is subject to all applicable hazardous waste regulations, including Land Disposal Restrictions of 40 CFR §268. The TCEQ also apprises CSSA that in the *Management of Remediation Waste Under RCRA* EPA530-F-98-026 October 1998, it states that "documentation regarding a source of contamination, contaminant or waste is unavailable or inconclusive, EPA has stated that one may assume the

LTC Shirley  
March 24, 2005  
Page 2

source, contaminant or waste is not listed waste and, therefore, provided that material in question **does not exhibit a characteristic hazardous waste** (underscore and boldface supplied for emphasis), RCRA requirements do not apply." Crucial, therefore, to these requirements are the correct and proper sampling, waste analysis and characterization.

As previously stated in the November 18, 2004, the above issues of waste characterization, "pre-RCRA" wastes and determination when contamination is caused by listed waste should be evaluated during the rewrite and update of the report entitled *RFI and Interim Measures Waste Management Plan August 2002*. The TCEQ reiterates the need to update the waste management plan.

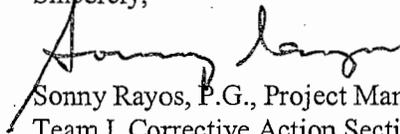
The closure report originally submitted in February 2004 for AOC-55, specified that remediation, cleanup and closure at AOC-55 attained Risk Reduction Standard No. 1. At this time, the TCEQ Corrective Action Section is deferring its decision pending consultation with the TCEQ Region 13 Office San Antonio.

Please prepare a written comment regarding CSSA waste characterization with possible proposal for procedural processes to ensure that improper waste characterization will not occur in the future. An original and one copy of the written response 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 on or before May 25, 2005. The facility name, location and identification number(s) in the TCEQ reference line above should be included in your response.

To document compliance with the Texas Professional Geoscience Act, the Remediation Division will not review reports and documents received on or after September 1, 2004 that do not contain the seal of a Texas Professional Geoscientist for geoscience services and work. Reports and documents containing geoscience information that are not stamped with a Texas Professional Geoscience seal will be returned to the submitting party. For further information, please consult the webpage of the Texas Board of Professional Geoscience at <http://www.tbpg.state.tx.us>. Any inquiry regarding what constitute geoscience information or what information requires a Professional Geoscientist seal shall be made to the Board by calling 512.936.4400, in Austin, Texas. Examples of geology work which requires a Professional Geologist seal are provided in the link: <http://www.tnrcc.state.tx.us/permitting/remed/techsupp/PGReports.pdf>.

Please contact me at 512.239.2371 or at [srayos@tceq.state.tx.us](mailto: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,



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  
Mr. Brian Murphy, Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, TX 78015-4800  
Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX 78754  
Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX



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

May 19, 2006

U-092-06

Mr. Sonny Rayos  
Texas Commission on Environmental Quality  
Remediation Division  
PO Box 13087 (MC-127)  
Austin, TX 78711-3087

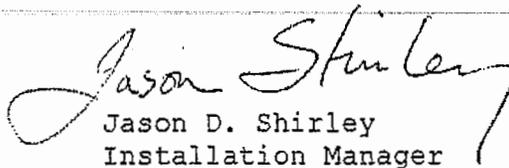
Subject: Revised RFI and Interim Measures Waste Management Plan,  
Camp Stanley Storage Activity, Boerne, Texas, EPA  
Identification Number: TXD2210020739, US EPA Docket Number:  
RCRA-VI 002(h)99-H FY99

Dear Mr. Rayos:

The Camp Stanley Storage Activity (CSSA), McAlester Army Ammunition Plant, U.S. Army Field Support Command, Army Materiel Command, U.S. Army is providing two copies of the facilities Revised RFI and Interim Measures Waste Management Plan. Your approval of this document, which incorporates your comments, is requested.

If you have any questions or concerns, please feel free to contact, Glaré Sanchez, Environmental Program Manager, at (210) 698-5208.

Sincerely,

  
Jason D. Shirley  
Installation Manager

Attachment

cc: Ms. Glare Sanchez  
CSSA Environmental Program Manager (ltr w/encl.)  
Mr. Greg Lyssy  
EPA Region 6 (ltr w/encl.)  
Ms. Abigail Power  
TCEQ Region 13 (ltr w/encl.)  
Mr. Brian Siegfried  
AFCEE/Portage (ltr only)  
Ms. Julie Burdey  
Parsons (ltr only)  
Ms. Kimberly Vaughn  
Parsons (ltr only)

Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 28, 2006

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

Re: Waste Management Plan - Approval  
Camp Stanley Storage Activity (CSSA), Boerne, TX  
TCEQ Solid Waste Registration No. 69026  
EPA ID No. TX2210020739

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) received the report *RFI and Interim Measures Waste Management Plan - Revised*, dated May 2006. The waste management plan will be used to provide guidance regarding proper waste management when industrial solid wastes, investigation or remediation derived wastes, hazardous wastes, Unexploded Ordnance, municipal hazardous wastes and other wastes normally associated with military activities are encountered during remediation and cleanup activities at CSSA. The TCEQ acknowledges misnomers in the designation of units at the site; CSSA does not have RCRA Facility Investigation (RFI) units that require investigations under the requirements of the Hazardous and Solid Waste Amendment (HSWA).

The TCEQ has completed its review of the waste management plan and approves the use of the plan at CSSA.

Please contact me at 512.239.2371 or at [srayos@tceq.state.tx.us](mailto:srayos@tceq.state.tx.us) if you wish to discuss or if you have any questions concerning this letter.

Sincerely,

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

Sonny Rayos, P.G., Project Manager  
Team 3, Environmental Cleanup II  
Remediation Division

cc: Ms. Glare Sanchez, Camp Stanley Storage Activity, 25800 Ralph Fair Rd., 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 Inc., 8000 Centre Park Drive, Suite 200, Austin, TX 78754  
Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX

