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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 26, 2009

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

Re: Affected Property Assessment Report for Area of Concern No. 63 -- Request for Additional Information  
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) has reviewed the report entitled *Affected Property Assessment Report (APAR) for Area of Concern (AOC) - 63* dated August, 2008. AOC-63 is undeveloped tract of land, approximately one acre, identified as potentially contaminated and requiring additional environmental investigation after ocular inspection documented the presence of three half buried 55 gallon drums. The APAR speculates that because of the concentration levels and distribution of Volatile Organic Compounds (VOCs) and Semi Volatile Organic Compounds (SVOCs) in the soil, the contaminants represent non-point source anthropogenic impacts from nearby roads and brush clearing and burning activities. Since the Chemicals of Concerns (COCs) do not exceed site derived background and Protective Concentration Levels (PCLs), either Tier 1 or Tier 2, the report concludes no further assessment and no response action is necessary.

The TCEQ has reviewed the APAR. Based on our review, the TCEQ cannot approve the APAR, at this time. A list of the comments or request for additional information is as follows:

1. In Page 4-2 of the report and then again in Page 10-1 and 10-2 of the report, it stated that Sample Quantitation Levels (SQLs) for VOCs and SVOCs are greater than the cPCLs. As a result, these constituents were not evaluated further as possible AOC-63 constituents. Because the SQLs are greater than the cPCLs, Camp Stanley should have investigated these COCs as potential releases to the environment and subject to additional investigation and/or verification to determine if, in fact, are related to releases from AOC-63. The TCEQ requests Camp Stanley to collect additional soil samples and retest for VOCs and SVOCs. If possible, lower quantitation limits should be requested from the laboratory.

2. In Page 4-3 and 4-4 of the report, it stated that hold times for explosives constituents of samples A2, B-1 and A-5 were exceeded. Additionally and as an example, the Non Detect results (for Sample ID No. AOC63A4(0-0.5)) for 1, 3 dinitrobenzene, 2,4,6 Dinitrofluorene and 2,6 Dinitrotoluene are 30.4, 56.2 and 103 ug/kg. The residential 30-acre PCLs for these constituents are 3.8 and 2.7 and 2.4 ug/kg. The TCEQ requires Camp Stanley to resample and analyze for explosives (i.e., Method 8330) at these areas and request the laboratory to run the analysis within the hold time of the samples.

3. The laboratory analytical reports and Data Usability Summary indicate that soils samples were collected and analyzed for perchlorates (i.e., Method 314). The APAR; however, does not contain any narrative or discussion pertaining to the perchlorates test results. The TCEQ requests discussion of the test results and comparison of the test results with the critical PCLs. Method 314 has an inherent flaw that it is subject to false positives. The TCEQ requires resampling and analyzing the soil samples using laboratory Method 6850 or 6860.

4. Based on the above stated request for additional information, it appears that low level soil contamination exists at AOC-63. It appears to be consistent with historical use as disposal area and the constituents, subject to long term exposure, have degraded over time. It is debatable whether the constituents are from road way anthropogenic impact, brush clearing and burning activities. Consequently and while not purportedly an expert in ecological studies, it would appear that these low level constituents could potentially impact ecological receptors (i.e., burrowing animals and other critters) within AOC-63. The TCEQ requests further determination (as soon as better data is available from the above request for additional information (items 1-3)) if this low level contamination presents potential ecological impacts at AOC-63.

5. In addition to the above-stated request for additional information, attached (Enclosure No. 1) please find the comments of Mr. John Wilder, TCEQ Technical Support Section, pertaining to his review of the APAR. The comments are reproduced in its entirety for Camp Stanley's response.

Please prepare a written response to each comment, referencing the assigned TCEQ comment number, unless otherwise specifically requested in the enclosure. An original and one copy of the written response to these comments or request for additional information must be submitted to the TCEQ Remediation Division 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 28, 2009. The facility name, location and identification number(s) in the TCEQ reference line above should be included in your response.

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Questions concerning this letter should be directed to my attention at 512.239.2371 or via email at [srayos@tceq.state.tx.us](mailto:srayos@tceq.state.tx.us). Thank you for your continued cooperation.

Sincerely,

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

Enclosure: InterOffice Memorandum dated February 5, 2009

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