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

April 20, 2005

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

Re: Remediation of Solid Waste Management Unit Demolition Dud Area according to Risk

Reduction Standard No. 1 - Approval;

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 the report entitled *Final Solid Waste Management Unit Demolition Dud Area Closure Report* dated January 2005. The report documented the closure and remediation conducted at Solid Waste Management (SWMU) Demolition Dud Area. Remediation activities consisted of excavation and removal of a total of 2,230 cubic yards of contaminated soil. Additionally, 240 UXO items and 10,040 pounds of metal scrap were disposed and managed at the Waste Management, Inc. Covel Gardens Landfill. Confirmation sampling for constituents of concern showed that lead, mercury and dinbutylphthalate exceeded the background concentration. However, according to statistical analyses of data, these exceedances above background were determined to be not statistically significant. The report recommended closure of the SWMU Demolition Dud Area according to Risk Reduction Standard (RRS) No. 1.

In order to attain RRS No. 1, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated from affected media (i.e., soil, surface water, groundwater, air) to naturally occurring background levels or the Practical Quantitation Limits (PQL), provided that the person demonstrates that lower quantitation limits are not possible when PQLs are greater than background.

Based on the information contained in the final report, it appears that remediation activities conducted in the soil medium have been completed in accordance with the RRS No. 1, pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S. Accordingly, deed notice and post-closure care are not required for SWMU Demolition Dud Area. No further closure or corrective action under Chapter 335 is required for this unit.

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Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the response actions described in the report fail to comply with these requirements, Camp Stanley Storage Activity must take any necessary and authorized action to correct such conditions. A TCEQ field inspector may conduct an inspection of your site to determine compliance with the report.

Questions concerning this letter should be directed to my attention at 512.239.2371 or at <a href="mailto:srayos@tceq.state.tx.us">srayos@tceq.state.tx.us</a>. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Corrective Action Section at Mail Code MC-127. An additional copy should be submitted to the local TCEQ Region Office. The information in the reference block should be included in all submittals.

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