

**RFI AND INTERIM MEASURES WASTE MANAGEMENT PLAN
ADDENDUM
AT
CAMP STANLEY STORAGE ACTIVITY
BOERNE, TEXAS
Addendum Specific to SWMU B-27**

**SECTION 1
INTRODUCTION**

A Site Closure Investigation will be performed to remove impacted media and buried waste located at SWMU B-27 to achieve closure of the soil zone. The closure methodology and procedures are described in the *SWMU B-27 Work Plan and Sampling Analysis Plan Addendum*, February, 2011. Background information on SWMU B-27 can be found in the CSSA Environmental Encyclopedia, Volume 3-1. Specific activities associated with this RFI/IM WMP and planned RFI/IM Waste/Contaminated Media Management is associated with this addendum.

The investigation for SWMU B-27 will include a temporary staging area, silt fencing for sediment control, and a small berm upgradient of the site to minimize run-on. While the exact location of these features will be field-determined, the temporary staging area will be established adjacent to the south side of the site, the run-on control berm will also be situated along the southern boundary of the site, and the silt fencing will be located along the northern portion of the site. All three of these features will be located outside the original boundary of the site. These features and the site boundary are shown on Figure 1.

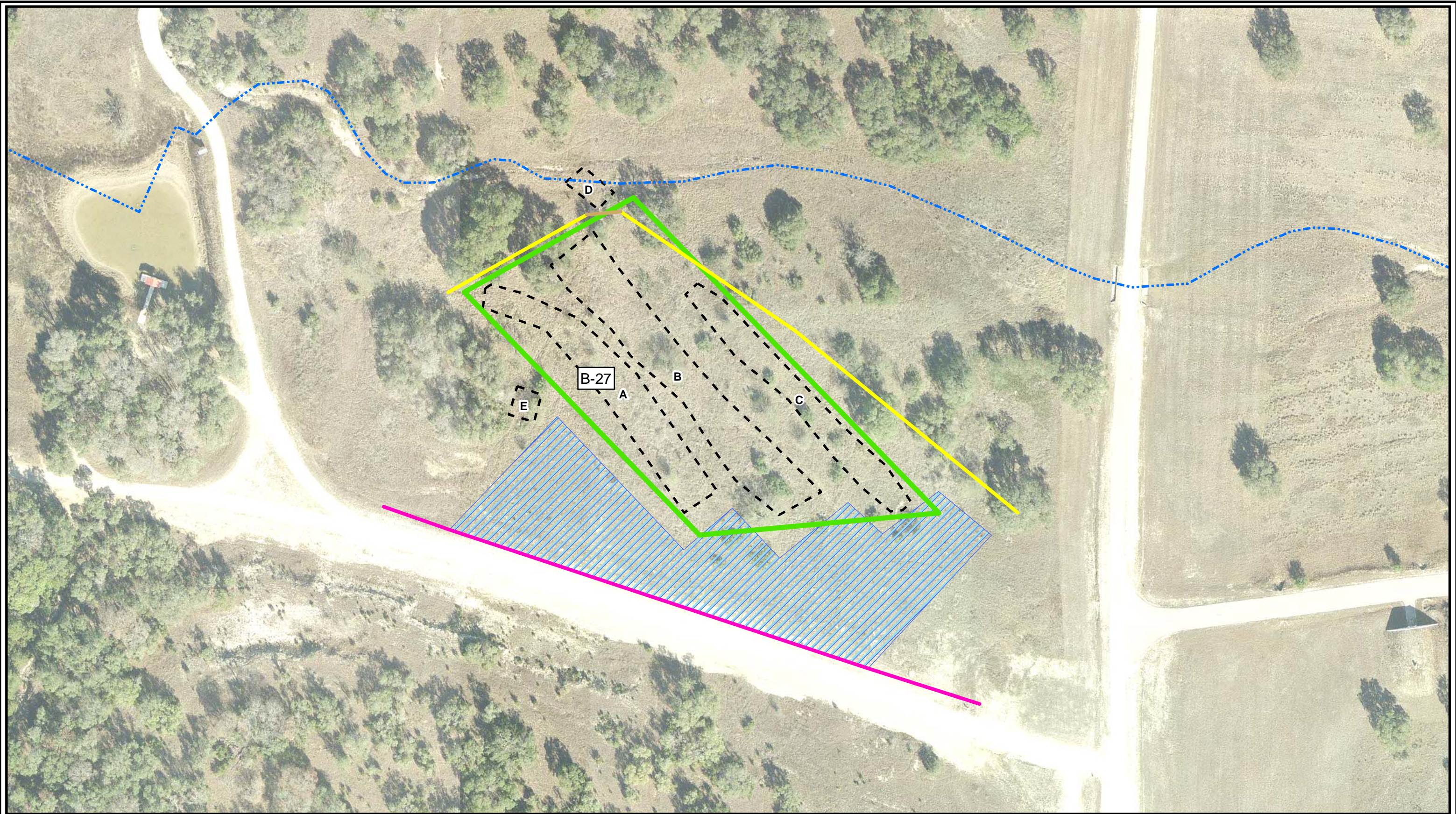
All excavated soil media will be stockpiled for sorting of foreign debris and certification to be free of munitions and explosives of concern (MEC). Segregated stockpile areas may be delineated based on field screening assessments, analytical data results, or material contained therein. In the unlikely event that suspected hazardous or exotic (unknown) materials are encountered, these will be segregated into separate stockpiles. Ordnance material was discovered at SWMU B-27 during a series of exploratory trench excavations previously performed at the site. Due to the identification of MEC at the site, excavation activities will be supervised by UXO technicians to provide UXO identification and avoidance for the workers and equipment performing the removal action activities and to address safety issues associated with ordnance material.

The sampling methodology, analytical parameters, and quality control measures that will be followed for this effort are described in the *SWMU B-27 Work Plan and Sampling and Analysis Plan Addenda*, February, 2011. For impacted soil media, waste characterization sampling will occur at a frequency of 1 sample per 500 CY. All impacted soil media that meets non-hazardous criteria, and CSSA standards for berm reuse, will be transported to the East Pasture berm for reuse. All non-impacted soil, as

per analysis results, will be reused on the site. Impacted soil media which is believed to contain potential contaminants of concern (COCs) greater than 20 times the regulated TCLP criteria (*i.e.*, 20 times rule) will undergo waste characterization sampling at a frequency of 1 sample per 200 CY. The trench contents and impacted soil will be excavated until all evidence of impact is removed. It is anticipated that as much as 15,000 CY of soil will require some form of management.

CSSA will utilize the Area of Contamination concept in managing and treatment of contaminated media or waste. Treatment efforts will include the stabilization of hazardous inorganic impacted media (*i.e.* with use of PIMS, etc.) within the defined area of contamination, thus rendering the media non-hazardous before disposal or recycling. Additionally, management of remediation waste will follow USEPA guidance in a memorandum issued on October 14, 1998, *Management of Remediation Waste Under RCRA*, EPA 530-F-98-026.

All removal work will be performed in Level D personal protective equipment. The excavated material will be handled and disposed as determined by waste characterization testing, as described above.



Aerial Photo Date: 2009



0 125 250 500 Feet

- 1 Foot High Berm
- Hay Bale Filter Dam
- Silt Fence
- Intermittent Stream
- Geophysical Anomaly Area
- SWMU Boundary
- Staging Area

Figure 1
 SWMU B-27
 Proposed Excavation Effort
 Camp Stanley Storage Activity

PARSONS