



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

13 January 1994

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED P 239 549 709

Colonel Joseph G. Robles
Department of the Army
Camp Stanley Storage Activity, RRAD
Post Office Box 69027
San Antonio, Texas 78269-0627

Re: Approval of Request for a Time Extension for Revision of the
Closure Plan for the B-20 Open Burning/Open Detonation
Unit, Camp Stanley Storage Activity (CSSA), Boerne, Texas;
Docket Number V-310-H; EPA I.D. Number TX2210020739

Dear Colonel Robles:

In accordance with previous discussions and the telephonic conference between Environmental Protection Agency Region 6 (EPA), CSSA Management, and legal and technical representatives of the Department of the Army conducted on December 20, 1993, CSSA is hereby granted a sixty (60) day extension, commencing upon receipt of this letter, for revision and resubmittal of the Closure Plan for the B-20 Unit.

As previously discussed, the technical difficulties associated with adequate sampling of this type of unit warrants an intensive screening of methods that can characterize this unit. For closure, the plan must identify the steps necessary to close the B-20 Unit. The steps required to close must be broken down in sufficient detail such that: 1) the closure process is understandable; 2) a closure schedule can be developed; and 3) quantities and unit prices can be developed for closure cost estimation. Based upon this information, appropriate sampling and analyses methodologies can be chosen to adequately characterize the B-20 Unit.

The closure plan should include an estimate of the maximum inventory of hazardous wastes ever placed within the unit over the active life of the unit. The closure plan should include, but not be limited to, a detailed description of the methods for removing, transporting, treating, storing, or disposing of all hazardous waste, identification of and the type(s) of hazardous waste management units(s) to be used, if applicable. This entails an adequate estimate of inventory that was placed within the unit, and a detailed standard operating procedure utilized for employment of the unit including a documented account from former or present CSSA personnel regarding what, where, and how hazardous wastes were placed within this unit.

The closure plan should also include a schedule for closure of the B-20 Unit. This schedule should include the total time required for closure, and have sufficient detail to allow tracking of the progress of closure. In general, the breakdown should correspond to the steps

required to close as described in the closure plan. CSSA should also be prepared to amend the closure plan whenever: 1) changes in operating plans or facility design affect the closure plan; 2) there is a change in the expected time of closure; and 3) in conducting closure activities, unexpected events occur which require a modification of the closure plan. If an unexpected event occurs during the closure period, CSSA must amend the closure plan no later than 30 days after the unexpected event. Unless an exemption is granted, the Texas Natural Resource Conservation Commission (TNRCC), closure of the B-20 Unit must be completed within 180 days of final approval of the closure plan by TNRCC.

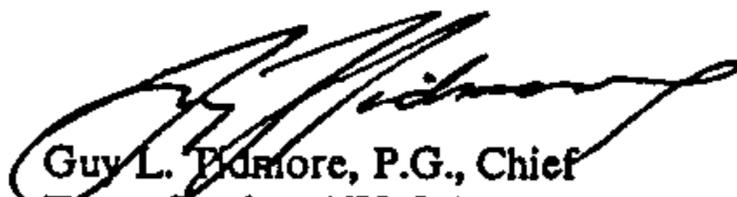
The closure plan must specify that within 60 days of completion of closure of the B-20 Unit, CSSA will submit certification that the B-20 Unit, as applicable, has been closed in accordance with the approved closure plan. Furthermore, the closure strategy, whether clean closure, closure in place, closure in place after remediation, or closure under TNRCC's Subchapter S must be addressed. The appropriate closure criteria should be identified by CSSA. The stated method of closure will allow both Agencies to assist you in your closure strategy. Please address these comments, revise your closure plan, and submit your revisions to both Agencies within 60 days of receipt of this letter. Also, at the time of submission of the certification of closure, CSSA must submit a survey plat to the local zoning authority or the authority with jurisdiction over local land use, and to the EPA Regional Administrator. This survey plat must indicate the location and dimensions of landfill cells or other hazardous waste disposal units with respect to permanently surveyed benchmarks.

The closure plan must include a cost estimate based upon on the costs to CSSA of closing the B-20 Unit. This cost estimate should be based upon quantities and unit costs for materials and labor (including supervision). Furthermore, closure costs are best understood when they are broken down to parallel the steps required to close the B-20 Unit given in the description of closure.

Finally, the revised closure plan should include a detailed rationale explaining the appropriate technical approach to characterizing the B-20 Unit.

If you require further comment upon this matter, please contact me at (214) 655-6794, or have a member of your staff contact Matt Andrus at (214) 655-2248.

Sincerely yours,



Guy L. Edmore, P.G., Chief
Texas Section (6H-CT)
RCRA Enforcement Branch

cc: Wendy Rozacky, TNRCC
Connie Wong, TNRCC
Cecil Irvay, TNRCC
Paul Oliver, CSSA
Lonnie Wright, RRAD