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November 23, 2010

Mr. Greg J. Lyssy
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue (6SF-LT)
Dallas TX 75202-2733

Subject: *2010 Updates:*
Three-Tiered Groundwater Long-Term Monitoring Optimization (LTMO) and
Data Quality Objectives for the Groundwater Monitoring Program
TCEQ Solid Waste Registration Number 69026
EPA Identification Number: TXD2210020739

Dear Mr. Lyssy:

Camp Stanley Storage Activity (CSSA) has revised the attached two documents relevant to their groundwater monitoring program. This submittal includes updates to both the *Three-tiered Long-Term Monitoring Optimization (LTMO) Evaluation* and *Project Data Quality Objectives (DQOs)* for groundwater monitoring conducted at both on- and off-post wells in, and around CSSA.

CSSA submitted the original LTMO document to your regulatory agency for review and approval in May 2005. At that time, both the USEPA and the TCEQ limited their approval to implement the LTMO recommendations to on-post wells only. Since that time, CSSA has collected another 5 years of groundwater data to further optimize and refine the sampling network, including the off-post wells. The concepts of LTMO were presented to the public during open meetings conducted in November 2009. With your approval, it is the intention of CSSA to implement the LTMO recommendations at off-post monitoring locations in 2011.

This submittal also includes a revision to the 2006 Data Quality Objectives (DQOs) currently in place for on- and off-post groundwater monitoring at CSSA. The initial DQOs covering the Groundwater Monitoring were submitted to EPA and TCEQ for review April 2002. No suggestions or comments were received and CSSA proceeded under the provisions of the DQOs beginning with the September 2002 quarterly groundwater monitoring event. Revised versions of the DQOs have been submitted in February 2004, and again August 2006. Regulatory response received thus far has indicated that the objectives and procedures are adequate for addressing both on- and off-post contamination at CSSA. CSSA intends to implement this 2010 DQO revision during the March 2011 quarterly sampling event.



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CSSA would like to implement the recommendations of the optimization evaluation and revised DQOs in the 2011 groundwater monitoring program. Please provide your comments at your earliest convenience to enable CSSA to meet this schedule. CSSA intends to include these topics for discussion at the planned regulatory meeting to be held tentatively at CSSA in January 2011. If you have any questions or comments, please call Gabriel Moreno-Fergusson of CSSA at (210) 698-5208 or myself at (512) 719-6087.

Sincerely,

A handwritten signature in black ink that reads "Scott Pearson". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Scott Pearson, P.G.

xc: Gabriel Moreno-Fergusson, CSSA
Abigail Power, TCEQ Region 13
Julie Burdey, Parsons