



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6**

**1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733**

Transmitted via email

May 5, 2016

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

RE: 1) *Data Quality Objectives (DQOs) – Groundwater Monitoring Program*
2) *Synopsis of Metals Detections in Camp Stanley Groundwater - Compendium Document to the 2015 Data Quality Objectives and Long-Term Monitoring Optimization Documents, dated January 28, 2016*
Camp Stanley Storage Activity, Boerne, Texas

Dear Mr. Shirley:

The Data Quality Objectives (DQOs) – Groundwater Monitoring Program, dated February 2016, and the Synopsis of Metals Detections, dated January 28, 2016, for Camp Stanley Storage Activity (CSSA), have been reviewed by the United States Environmental Protection Agency (EPA) in accordance with the final Resource Conservation and Recovery Act (RCRA) § 3008(h) Administrative Order on Consent for CSSA, (Order Docket No. RCRA-VI 002(h)99-H FY99, dated May 5, 1999.

As part of CSSA's DQO review process, the groundwater monitoring analyte list for volatile organic compounds (VOCs) was reduced from six compounds to four [dropping 1,1-dichloroethene (1,1-DCE) and *trans*-1,2-dichloroethene (*trans*-1,2-DCE) while retaining tetrachloroethene (PCE), trichloroethene (TCE), *cis*-1,2-dichloroethene (*cis*-1,2-DCE) and vinyl chloride (VC)]. Since CSSA is using both biotic and abiotic degradation as part of the remediation process, if future groundwater monitoring analytical results document significant increases in *cis*-1,2,-DCE, CSSA shall evaluate whether 1,1-DCE and *trans*-1,2-DCE will need to be added back to VOC analyte list.

In addition, CSSA has proposed that metals will no longer be sampled as part of the monitoring program, with the exception of drinking water wells, and the groundwater monitoring wells associated with the SWMU B-3 bioreactor and the AOC-65 in-situ chemical oxidation (ISCO) remediation. After reviewing the voluminous amount of metals groundwater monitoring data that has been collected over the years, the EPA concurs with this recommendation.

After careful consideration, the EPA approves the two referenced documents, and their recommendations should be incorporated into the overall CSSA groundwater monitoring program.

If you have any questions, please feel to contact me at 214-665-8317 or via e-mail at lyssy.gregory@epa.gov.

Sincerely,

Greg J. Lyssy

Greg J. Lyssy
Senior Project Manager
RCRA Corrective Action Section (6MM-RC)

cc: Felicia Krantz, CSSA
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