DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, MCAAP
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

July 17, 2018

U-049-18

SUBJECT: Sampling of Water Well I10-2, Located at 25300 IH10 West

[redacted]
San Antonio, TX 78257

Dear [redacted]

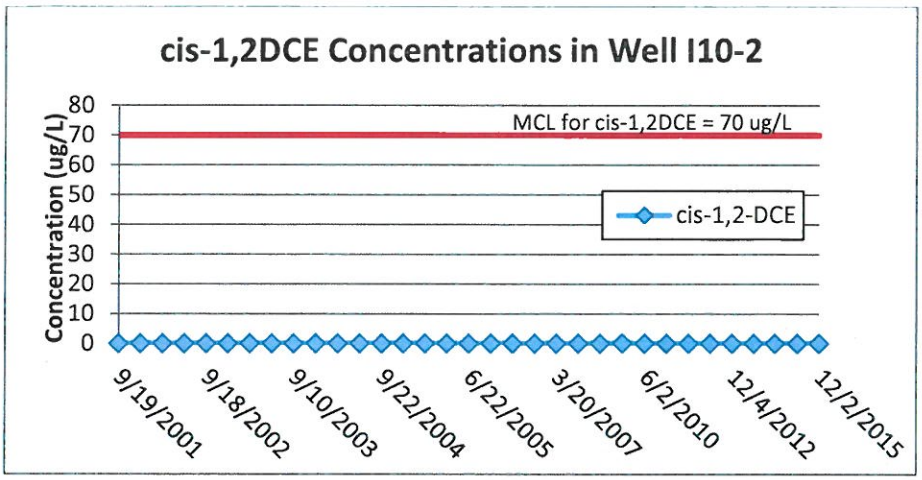
Camp Stanley Storage Activity (CSSA) attempted to collect a groundwater sample from the above mentioned well (I10-2) on 6/6/18. However, the well was not operational, and the sample could not be collected.

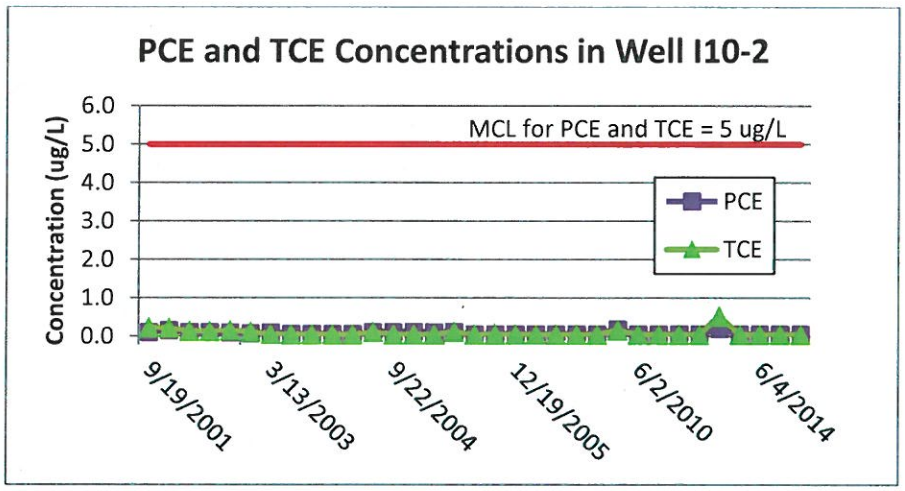
CSSA has been monitoring off-post groundwater for the presence of volatile organic compounds (VOCs) since 1999. The locations and frequencies for sample collection are determined by a process called Long-Term Monitoring Optimization (LTMO), which is performed by CSSA every five years. The most recent LTMO evaluation was performed in 2015, and the resulting recommendations were approved by the U.S. Environmental Protection Agency (USEPA) and the Texas Commission on Environmental Quality (TCEQ).

LTMO focuses the groundwater monitoring effort by increasing monitoring frequency and sampling locations in areas where there are data gaps and eliminating redundant sampling of the groundwater plume. For the mature monitoring program at CSSA, where we have been testing groundwater quality for nearly 20 years, data gaps have been filled and the extent of contamination is well understood. Decreases in monitoring frequency and locations can be implemented in ways that do not sacrifice monitoring objectives, maintain adequate understanding of groundwater conditions, but also provide cost savings.

As a result of the 2015 LTMO evaluation, your well is one of 41 off-post wells that are recommended for exclusion from future monitoring. Wells recommended for exclusion from future sampling are either greater than 1.5 miles from the CSSA boundary and the groundwater plume, or they have consecutive non-detect results over the course of 5 years of sampling. Contaminant concentrations in wells greater than 1.5 miles from the CSSA boundary are not expected to increase in the future due to their distance from the plume's source. Wells with consistent non-detect concentrations over 5 years are also unlikely to see a change in their concentrations.

The following charts show the entire history of groundwater sampling results from your well and compares them to the USEPA Maximum Contaminant Levels (MCLs) for drinking water:





Your well was scheduled for sampling in June 2018, however, a pump outage at your well prevented the field team from collecting a sample. No samples have been collected from your well since December 2015 due to pump outages. Based on past sampling results from your well, shown in the above graphs, the USEPA and TCEQ have concurred with removing your well from the monitoring program in June 2018 pending 5 years of monitoring results with no VOC detections. Although historical data indicate non-detections or trace detections for VOCs, a final data point to confirm the historical trend of non-detections is the most conservative approach prior to excluding your well from future monitoring.

We understand that operational status of this well is not essential to your business operations. But if it is ever repaired in the future, we would like the opportunity to collect a sample from your well to confirm the continued absence of VOCs in your groundwater supply. If not, we will follow the EPA/TCEQ-approved recommendation of excluding your well from the groundwater monitoring program.

As part of the ongoing CSSA environmental program, we are continuing to investigate and cleanup VOC source areas on the installation and to track these compounds in groundwater on- and off-post.

If you have any questions concerning this letter, please contact Margarita Loya, Environmental Program Manager, at (210) 295-7067.

Sincerely,

Jason D. Shirley
Installation Manager

Enclosure

cc: Mr. Greg Lyssy, EPA Region 6
Mr. Timothy Brown, TCEQ Central Office
Mr. Jorge Salazar, TCEQ Region 13
Ms. Kyle Cunningham, San Antonio Metropolitan Health Dist.
Ms. Julie Burdey, Parsons