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Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 6, 2003

Mr. Brian Murphy
Camp Stanley Storage Activity
Attention: Environmental Office
25800 Ralph Fair Road
Boerne, TX 78015-4800

Re: Camp Stanley Storage Activity (CSSA), Boerne, TX;
TCEQ SWR No. 69026;
Solid Waste Management Unit B-32;
Request for additional information regarding SWMU B-32 closure

Dear Mr. Murphy:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the report entitled *Solid Waste Management Unit B-32 RCRA Facility Investigation - Closure Report*. The report was submitted via a Camp Stanley Storage Activity letter dated January 21, 2003 from Mr. Jason Shirley, Installation Manager. The report concludes that Risk Reduction Standard (RRS) No. 1 was attained based on actual waste removal and laboratory analyses which indicated that all remaining metal constituents are below the CSSA background soils metal concentrations.

Based on our review, the TCEQ cannot approve the attainment of RRS No. 1 for SWMU B-32, at this time. The following are TCEQ's comments or request for additional information:

1. In Appendix C, the report states that the Data Quality Objective to attain RRS No. 1 was not achieved. As further explained in the report, metals constituents of three subsurface soil samples exceeded the Glen Rose limestone background values; however, when the subsurface soil samples were compared with the surface soils (i.e., CSSA background soils), the metals concentration are compliant or less than the CSSA soils background. It is for this reason that CSSA requested a RRS No. 1 approval from the TCEQ. Our review indicates a mismatched comparison, consequently, the TCEQ cannot approve a RRS No. 1 closure for SWMU B-32. The TCEQ would like to reexamine all data pertaining to the background sampling. The TCEQ requires the submission of the background metals value for the all metals constituents for the Glen Rose limestone and for the CSSA soils. This data should be presented in a tabular form. Additional information should include the number of samples collected for each of the background determinations and the depths at which all samples were collected, and

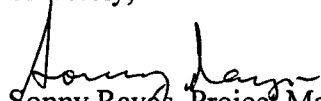
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2. The report indicated that all ITS data were not used. The TCEQ would also like to reexamine these data. The TCEQ requests the submission, if any, of relevant ITS data (i.e., background and verification sampling data) pertaining to the closure of SWMU B-32. It has been the understanding of the undersigned that organics data from ITS were not useable but inorganics tests were, at least, admissible.

Please prepare a written response to each comment or request for additional information. An original and one copy of the written response to these comments or request for additional information must be submitted to the TCEQ at the letterhead address using mail code number MC-127. An additional copy should be submitted to the TCEQ Region 13 Office in San Antonio. Your response must be received on or before July 7, 2002. The facility name, location and identification number(s) in the TCEQ reference line above should be included in your response.

Please call me at 512.239-2371 or email me at srayos@tceq.state.tx.us if you need additional information or wish to discuss these comments or the due date. Thank you for your cooperation in this matter.

Sincerely,


Sonny Rayos, Project Manager
Team I, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

cc: Mr. Greg Lyssy, U.S. EPA Region 6, 1445 Ross Ave (6SF-LT), Dallas, TX 75202-2733
Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX
78754
Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX