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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 15, 2003

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

Re: Camp Stanley Storage Activity, Boerne, TX;
TCEQ SWR No. 69026;
Solid Waste Management Unit (SWMU) B-32;
Letter from LTC Jason Shirley dated May 13, 2003

Dear Mr. Murphy:

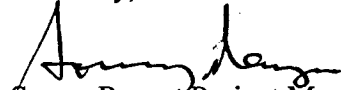
The Texas Commission on Environmental Quality (TCEQ) has received the letter dated May 13, 2003 from LTC Jason Shirley, Installation Manager, Camp Stanley Storage Activity (CSSA). His letter responds to the TCEQ letter dated May 6, 2003 which requested additional information concerning the closure of SWMU B-32. The TCEQ letter requested CSSA to clarify the use of Risk Reduction Standard (RRS) No. 1 Soil-Air-Ingestion (SAI) cleanup values for metals contamination found at depths greater than two feet depth. The RRS No. 1 Groundwater Protection Standard (GWP) cleanup values should be used in such case and/or site-derived GWP background metal levels. LTC Shirley's letter indicated that despite elevated levels of barium, cadmium, chromium, nickel and zinc, above the GWP background concentrations, the concentrations are still protective of human health and the environment; in addition to being prudent, cost effective, reasonable and practicable.

The issue of "mismatched" use of RRS No. 1 cleanup levels and background values for SAI and GWP was discussed in a meeting in Austin on July 17, 2003. As agreed upon during the meeting, additional discussions regarding this issue will be pursued. Consequently, the TCEQ elects to defer its comments regarding LTC Shirley's letter pending consultation with Camp Stanley's consultants, Parsons Engineering, the TCEQ Region 13 Office and Greg Lyssy. In the alternative, the TCEQ does not have any additional concern if SWMU-B-32 is closed using RRS No. 2 instead of RRS No. 1. CSSA has the option to pursue this remedy in lieu of "clean-closure." Please inform the TCEQ of your selection. Your written response must be received on or before September 18, 2003. An original and one copy of your response 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. The facility name, location and identification number(s) in the TCEQ reference line above should be included.

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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 the RRS No. 2 option 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