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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 21, 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 Solid Waste Registration (SWR) No. 69026;
Letter of LTC Jason Shirley dated July 31, 2003

Dear Mr. Murphy:

The Texas Commission on Environmental Quality (TCEQ) has received a letter from LTC Jason Shirley, CSSA Installation Manager, dated July 31, 2003. His letter enclosed a guidance from the Department of Army on how to implement the Department of Defense (DoD) *Perchlorate Assessment Policy*. LTC Shirley's letter further indicated that because perchlorate is not a suspected contaminant at CSSA and no perchlorates have been detected at CSSA in the past, CSSA will be unable to justify a request for authorization (i.e., to test for perchlorates).

The TCEQ has reviewed LTC Shirley's letter. The TCEQ realizes the difficulties associated with securing funds or authorization for a project. However, as indicated in a meeting at the TCEQ Office in Austin on July 17, 2003, there is a known incident of open detonation of a rocket at CSSA at or near SWMU B-20. A copy of the meeting minutes is enclosed for your perusal. Furthermore, as stated in the meeting: (1) perchlorate is an anion and is not absorb in soil minerals and is highly mobile in aqueous systems; (2) there are two contaminated groundwater plumes that have migrated off-site and (3) there is potential for human-health exposure from drinking contaminated groundwater (Note: Granulated Activated Carbon is not capable of removing perchlorate in contaminated groundwater). Lastly, CSSA is located in area of known karst geology which further compounds the difficulty in determining the movement and detection of contamination. Because of the potential for possible human-health and public safety concerns, the TCEQ is requiring CSSA to sample the off-site drinking water wells for perchlorates. CSSA is advised that failure to comply with TCEQ Corrective Action Directives and subsequent requests, including the specified time frames, may result in the initiation of formal enforcement action by the TCEQ, potentially including administrative penalties up to \$10,000 per day for each violation.

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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 content of this letter.

Sincerely,



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

Enclosure: Inter Office Memorandum of Meeting Minutes

cc: Mr. Greg Lyssy, U.S. EPA Region 6, 1445 Ross Ave (6SF-LT), Dallas, TX 75202-2733
LTC Jason Shirley, Camp Stanley Storage Activity, 25800 Ralph Fair Rd., Boerne, TX
78015-4800
Ms. Julie Burdey, Parsons Engineering, 8000 Centre Park Drive, Suite 200, Austin, TX
78754
Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX

Texas Commission on Environmental Quality

CONFERENCE RECORD

To: The Central Records File
Camp Stanley Storage Activity
Solid Waste Registration No. 69026

Date: July 29, 2003

Thru: *DB* Mr. Donald Boothby, Supervisor
Team I, Corrective Action Section, Remediation Division

From: *AN* Sonny Rayos, Project Manager
Team I, Corrective Action Section

Meeting Date: Thursday July 17, 2003 at 1:30 p.m.

Participants: Mr. Sonny Rayos, Project Manager, TCEQ
Mr. Bryan Murphy, Project Manager, Camp Stanley Storage Area
Mr. Ken Rice, Project Manager, Parsons
Ms. Julie Burdey, Project Manager, Parsons
Mr. Brain Vanderglas, Project Manager, Parsons
Mr. Kirk Lawson, Project Manager, Parsons

A meeting was requested by Parsons, environmental consultants, to discuss remediation activities at Camp Stanley Storage Activity (CSSA). The meeting commenced at 1:30 pm with the above-stated individuals in attendance (see also attached Conference Record Attendance Sheet). A discussion regarding current and future closure activities ensued. There are currently 84 units that are slated for closure; of these, 17 units have been accepted by the TCEQ as having attained clean-closure. Two closure reports have just been submitted for review and 16 reports are scheduled to be submitted for this year and 2004. CSSA representative and Parsons are concerned of the possibility that about 49 units and its respective final closure documents will not be completed on or before May 1, 2005. (Note: 30 Texas Administrative Code 350.2(m)(1) specifies that a Risk Reduction Standard (RRS) No. 1 or 2 response action final report must be submitted five years after the initial (grandfathering) notification date of May 1, 2000.) CSSA and Parsons are requesting the TCEQ to be allowed to submit closure final reports according to RRS No. 1 and RRS No. 2 (and according to the RRS format) past the May 1, 2005 deadline. The TCEQ staff has indicated that CSSA will have to formalize this request in writing because concurrence from TCEQ upper management will have to be secured. If the foregoing option is not possible; CSSA may have to re-review the EPA 3008(H) Order and determine if the 3008(H) allows grandfathering past the May 1, 2005 deadline. The staff reiterated that CSSA has to write the TCEQ to officially request consideration that the closure of about 49 units be grandfathered under the previous RRS rules.

Parsons representatives discussed background metal concentrations at the upper two feet and greater than two feet depth for compliance with Soil Air-Ingestion (SAI) and GroundWater Protection (GWP) requirements of RRS No. 1. In the case of closure unit B-32, they indicated that Zn concentrations are actually higher than the site-specific Glen Rose GWP background concentration. They indicated that this in itself does not indicate contamination but variability in the limestone formation. However, when compared to the SAI site-derived background concentrations, Zn concentration is compliant with RRS No. 1. Furthermore, Parsons representatives indicated that Zn may not actually be a Constituents of Concern (COC) for unit B-32. While not a valid contention (because one cannot use the TRRP cleanup values for RRS remediation), Parsons indicated that Zn concentrations found in the Glen Rose limestone is less than the TRRP Tier 1 Residential

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PCLs. The staff indicated that justifications for consideration under RRS No. 1 has to be explained better. Because of this issue regarding background concentration levels, Parsons requested if COCs be examined on unit-specific basis rather than a facility-wide background level. The TCEQ staff indicated that Parsons need to evaluate and review the 3008(H) Order to determine if this is permitted.

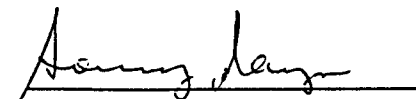
Regarding Data Quality Objective for verification of clean-closure, current practice at CSSA is to collect samples from the bottom and four excavation walls. In the approved Sampling and Analysis Plan, one sample is collected for every 100 linear feet. This sampling plan may not be suitable for smaller and larger units. The staff indicated that verification sampling may be conducted using unit-specific verification sampling plan and only if allowed by current 3008(H) Order.

With regard to TCEQ request for perchlorate tests, according to Mr. Brian Murphy, CSSA representative, there is one known incident of open burn/open detonation of rocket propellant at Camp Stanley. This was conducted at or near RFI B-20. Mr. Murphy indicated his preference to sample for perchlorates first on-site prior to proceeding to sample off-site. This is consistent with the preference of the EPA Project Manager Mr. Greg Lyssy. The TCEQ staff is concerned that if perchlorates is not found on-site, the testing for off-site contamination will not be pursued. The TCEQ staff has indicated TCEQ's preference is to sample off-site first. The rationale for this sampling are: (1) perchlorate is an anion and is not absorb in soil minerals and is highly mobile in aqueous systems, (2) there are two contaminated groundwater plumes that have migrated off-site from CSSA, and (3) there is a potential for human-health exposure from drinking contaminated groundwater. Because of these concerns, the staff recommended sampling for perchlorates at off-site drinking water wells first. However, since there are current on-site and off-site sampling programs, it would be best to conduct one-time sampling of on-site and off-site wells for perchlorate during these sampling events.

A discussion of Phosphate-Induced Metals Stabilization (PIMS) as a corrective measures technology for remediating metals in contaminated soil and groundwater was conducted by Mr. Ken Rice. This technology was successful in remediating lead (Pb) contamination at CSSA. The technology is also highly cost-effective. Parsons representatives requested if a presentation of this technology can be provided to the TCEQ Corrective Action staves. The TCEQ staff agreed; however, this has to be coursed thorough the TCEQ Vendor/Emerging Technology coordinator. A copy of the PIMS handout is provided as an attachment.

Copies of the reports entitled *Evaluation of Background Metals Concentration in Soils and Bedrock at CSSA Storage Activity Revised and Second Revision* were provided to the staff. In addition, the Department of Army Guidance for addressing potential perchlorate contamination was provided.

As indicated to the CSSA and Parsons representatives, the Region 13 Office will be made aware of the above-mentioned modification requests. Any decisions will have the approval and concurrence of Region 13 Office and TCEQ management in Austin.


Sonny Rayos

cc: Waste Program Manager, TCEQ Region 13 Office, San Antonio