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Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 23, 2004

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

Re: Camp Stanley Storage Activity, Boerne, TX;
TCEQ SWR No. 69026;
Building 40 <90-day Container Storage Area;
Request for additional information

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) has received the report entitled *Building 40 Container Storage Area Closure Report* dated September 2003. This report described the closure of less than 90-day Container Storage Area Building 40 (Notice of Registration Unit 001). To attain clean closure, Building 40 was pressure washed and final rinsate samples were collected for verify closure. Laboratory analyses of the final rinsate were tested for cadmium and lead. The report concluded that clean-closure was attained because laboratory analyses of the final rinsate were below the Protective Concentration Levels for these constituents.

The TCEQ has completed a review of the above-stated report. Based on our review, the TCEQ cannot approve the report at this time. A list of the comments or deficiencies is as follows:

1. The report did not specify the final disposition of Building 40. Please provide information whether Building 40 was demolished or whether it will be retained as a complete structure. Please provide the future use of Building 40 if retained as complete structure. If Building 40 was demolished, provide information whether disposal was conducted on-site or off-site. Provide manifests if disposed off-site.
2. Verification sampling consisted only of testing the final rinsate for cadmium and lead. According to the report, metals, Volatile Organic Compounds (VOCs), SVOCs and PCBs were stored at Building 40. The TCEQ requires analytical tests of the final rinsate for all of these constituents.

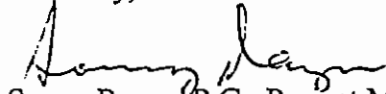
Please prepare a written response to each comment or deficiency by referencing the assigned comment number. An original and one copy of the written response to these comments or deficiencies must be submitted to the TCEQ at the letterhead address using mail code number

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MC-127. An additional copy should be submitted to the TCEQ Region 13 Office in San Antonio. Your response must be received within 60 days from the date of this letter. The facility name, location and the solid waste registration number 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 the content of this letter or the due date. Thank you for your cooperation in this matter.

Sincerely,



Sonny Rayos, P.G., 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