

Kathleen Hartnett White, *Chairman*
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Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 21, 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 less than 90-day Container Storage Area;
Your letter dated April 20, 2003 - Request for additional information

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) received your above stated letter on April 23, 2004. Your letter provided additional information concerning the closure of Building 40 in response to TCEQ letter dated February 23, 2004. The February 23, 2004 TCEQ letter rescinds, albeit not explicitly stated, the TCEQ letter dated January 5, 2004.

The TCEQ authority to collect information on the final disposition of the closed unit is from 30 Texas Administrative Code §335.8(c)(5) which states "Notwithstanding any other requirement, the person shall submit to the executive director upon request such information as may reasonably be required to enable the executive director to determine whether the closure or remediation is compliant with this section." As stated in your letter, Building 40 was not demolished after closure. In addition, you indicated that Building 40 had not been used for the last eight years and it's future use is undetermined at this time. The TCEQ is satisfied with CSSA's response to Request for Additional Information Item No. 1.

With regards to waste managed, your letter provided in a tabular form the waste stream descriptions (both TCEQ and CSSA), the TCEQ 8-digit waste code and the EPA waste codes. As indicated in your letter there is no documentation of any PCB waste managed at this site nor are there any PCB waste disposal records associated with the unit. Consequently, you concluded that PCB analyses is not warranted. Please note, however, contradictory statement in the report entitled *Building 40 Container Storage Area Closure Report*. On Page 2, first paragraph, second sentence of the report, it states that "From this list of stored materials, various metals, PCBs and SVOCs were considered as possible contaminants that may be present on the concrete floor inside the building." As a consequence of this report citation, the February 23, 2004 TCEQ letter required the following:

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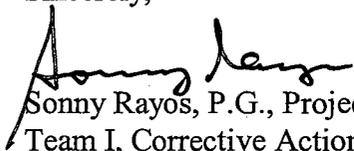
“Verification sampling consisted only of testing the final rinsate for cadmium and lead. According to the report, metals, Volatile Organic Compounds (VOCs), SVOCs and PCBs were stored at Building 40. The TCEQ requires analytical tests of the final rinsate for all of these constituents.”

The TCEQ reiterates this requirement as stated above.

Please submit a final report documenting closure. Please include all analytical results establishing attainment of Risk Reduction Standard No. 1. An original and one copy of the final report 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 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