



DEPARTMENT OF THE ARMY  
CAMP STANLEY STORAGE ACTIVITY, RRAD  
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

7 October 2004

U-001-05

Mr. Sonny Rayos  
Texas Commission on Environmental Quality  
Industrial and Hazardous Waste Section  
PO Box 13087 (MC-127)  
Austin, TX 78711-3087

Subject: Response to Request for Additional Information on AOC-37,  
Camp Stanley Storage Activity, Boerne, Texas  
TCEQ Industrial Solid Waste Registration #69026  
EPA Identification Number TX2210020739

Dear Mr. Rayos:

In your letter dated September 9, 2004, you requested sampling for volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) at AOC-37 to achieve site closure under Risk Reduction Standard No. 1 (RRS1).

In response to your request, AOC-37 was never used for waste management based on all information gathered on the site to date. AOC-37 was originally deemed an AOC because of its proximity to CS-MW-16 and the associated contamination discovered in this well. In search of the contaminant source area, several sites were established in the immediate proximity of CS-MW-16, one of which is AOC-37. A variety of methods were employed to investigate these sites, including geophysical surveys, surface soil sampling, historical records review, and soil gas surveys.

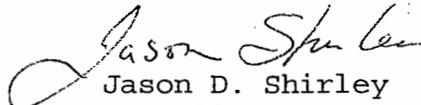
The geophysical survey conducted at AOC-37 did not reveal any evidence of subsurface waste. There are no records indicating that the AOC-37 area was ever used for waste disposal, nor are there any current or historical (aerial photographs) indications of waste or waste trenches at the site.

The results of the AOC-37 soil gas survey showed one tetrachloroethene (PCE) detection. For comparison, soil gas findings at AOC-38, which is directly southwest of AOC-37, indicated low levels of several VOCs in soil gas samples. Although VOCs were detected in soil gas, subsequent soil samples collected from AOC-38 had reported VOC concentrations below respective reporting limits (RLs). Since only PCE was detected at AOC-37, and at a lower concentration than PCE soil gas results from AOC-38, it is very unlikely that AOC-37 contains a source of VOC contamination. Also, soil gas survey results in areas adjacent to AOC-37 support the assertion that a source of VOC contamination is not present at the site.

Considering these findings at AOC-37, additional sampling at the site is not warranted. It is respectfully requested that AOC-37 be granted no further action status.

If you have any questions regarding this information, please feel free to contact me at (210) 295-7416.

Sincerely,

  
Jason D. Shirley  
Installation Manager

cc: Mr. Greg Lyssy  
EPA Region 6  
Mr. Richard Garcia  
TCEQ Region 13  
Mr. Rod Hudson  
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge Advocate  
Mr. Brian Siegfried  
Air Force Center for Environmental Excellence  
Ms. Julie Burdey  
Parsons