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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 24, 2005

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

Re: Letter dated December 27, 2004 regarding Solid Waste Management Unit B-23A;  
Risk Reduction Standard No. 1 - Approval;  
Camp Stanley Storage Activity, Boerne, TX;  
TCEQ SWR No. 69026;  
EPA ID No. TX2210020739

Dear LTC Shirley:

The Texas Commission on Environmental Quality (TCEQ) received your letter dated December 27, 2004, written in response to the TCEQ letter dated November 17, 2004. The TCEQ letter requests additional information concerning the closure of Solid Waste Management Unit (SWMU) B-23A. In particular, the TCEQ letter requests additional information concerning M-34 and its disposal. The original report submitted to document closure of SWMU B-23A documented the excavation and removal of 20 cubic yards of soil and surface waste. Confirmation sampling for metals constituent of concern showed levels below background concentration. The report recommends closure of SWMU B-23A according to Risk Reduction Standard No. 1.

Based on the information contained in the final report and your letter dated December 27, 2004, it appears that remediation activities have been completed in accordance with the TCEQ Risk Reduction Standard (RRS) No. 1 pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S. Therefore, deed notice and post-closure care are not required. No further closure or corrective action under Chapter 335 is required for this unit.

In order to attain RRS No. 1, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated from affected media (i.e., soil, surface water, groundwater, air) to naturally occurring background levels or the Practical Quantitation Limits (PQL), provided that the person demonstrates that lower quantitation limits are not possible when PQLs are greater than background.

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Please be aware that it is the continuing obligation of persons associated with a site to ensure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the response actions described in the report fail to comply with these requirements, Camp Stanley Storage Activity must take any necessary and authorized action to correct such conditions. A TCEQ field inspector may conduct an inspection of your site to determine compliance with the report.

Questions concerning this letter should be directed to my attention at 512.239.2371 or at [srayos@tceq.state.tx.us](mailto:srayos@tceq.state.tx.us). When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Corrective Action Section at Mail Code MC-127. An additional copy should be submitted to the local TCEQ Region Office. The information in the reference block should be included in all submittals.

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  
Mr. Brian Murphy, Camp Stanley Storage Activity, 25800 Ralph Fair Road, 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