



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

September 26, 2005

U-321-05

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

Subject: Implement LTMO Recommendations for Groundwater Monitoring at
Camp Stanley Storage Activity, Boerne, TX, TCEQ Solid Waste
Registration No. 69026, EPA Identification No. TXD2210020739

Dear Mr. Rayos:

Groundwater monitoring has been conducted at CSSA wells since 1992. Quarterly groundwater monitoring has been conducted at CSSA and in the neighboring off-post wells since 1999. EPA-approved Data Quality Objectives (DQOs) have been in effect for groundwater monitoring since November 2003 and the Off-post Monitoring Response Plan has been in effect since June 2002. Approximately 70 wells are sampled each quarter.

Earlier this year, CSSA performed an optimization study using statistical and qualitative evaluations to eliminate redundancy in the sampling program and provide cost-effectiveness. On May 18, 2005, CSSA submitted the Final Three-Tiered Long Term Monitoring Network Optimization (LTMO) Evaluation recommending specific changes to the groundwater monitoring program. The LTMO study was submitted to both the US Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) and is currently pending regulatory review and comment.

CSSA requests approval to implement the recommendations of the LTMO study to the on-post groundwater monitoring program only. CSSA will not implement the LTMO recommendations for the off-post portion of the groundwater monitoring until regulatory review and comment is provided. Implementation of the LTMO study recommendations on-post will include the following changes to the DQOs:

- Reduce sampling frequency from quarterly to biennially for thirteen monitoring wells.
- Reduce sampling frequency from quarterly to annually for eight monitoring wells and three drinking water wells.
- Reduce sampling frequency from quarterly to semi-annually for sixteen monitoring wells.

- Reduce sampling frequency from monthly to semi-annual and/or biennial for the 47 zones in the four Westbay®-equipped multiport wells. Zones which have shown little to no variation in detected concentrations will be reduced to biennial sampling. All other zones will be monitored semiannually.
- Reduce the sampling frequency to annual for the two shallow monitoring wells near Building 90; and
- Exclude the piezometers sampled for the AOC 65 recharge study as the study is now complete.

Additionally, based on evaluations of historical detections, CSSA requests your approval to remove two chemicals (acetone and isopropanol [IPA]) from the analyte list for Westbay®-equipped wells only. Various investigations were performed to determine the source of acetone and IPA in the Westbay® samples, including sending split samples to another AFCEE QAPP compliant laboratory. The source was determined to be laboratory contamination.

CSSA is requesting your approval to implement the above LTMO changes on-post only, beginning with the December 2005 groundwater monitoring event. After we receive your comments on the LTMO evaluation, the DQOs will be revised and submitted for your review and approval. Please provide your concurrence or comments at your earliest convenience. If you have any concerns, please contact Glare Sanchez, the CSSA Environmental Program Manager, at (210) 698-5208.

Sincerely,


Jason Shirley
Installation Manager

cc:

Mr. Greg Lyssy, USEPA
Ms. Glare Sanchez, CSSA Environmental Office
Ms. Abigail Power, TCEQ Region 13
Mr. Brian Siegfried, AFCEE
Ms. Julie Burdey, Parsons
Ms. Kimberly Vaughn, Parsons