

January 30, 2006

Mr. Bryan Smith  
TCEQ  
Industrial and Hazardous Waste Permits Section  
MC-130  
P.O. Box 13087  
Austin, TX 78711-3087

RE: Waste Classification of Groundwater  
Class V Injection Well Inventory Authorization Form  
Camp Stanley Storage Activity, Boerne, TX

Dear Mr. Smith:

On behalf of Camp Stanley Storage Activity (CSSA), Parsons has prepared this letter in response to your question in our December 29, 2005 telephone conversation and your follow-up questions today regarding waste classification of groundwater at solid waste management unit (SWMU) B-3 at CSSA.

As I mentioned in our telephone conversation, a RCRA Facility Investigation/Interim Measures Waste Management Plan (WMP) was prepared in 2002 by CSSA which included a determination that soil and groundwater at SWMU B-3 (the area where the injection well will be located) does not contain a listed hazardous waste. Language from the WMP which summarizes this determination follows:

*Through the preparation of the RFA [RCRA Facility Assessment] that included a records search and the questioning of long-term staff involved with AOC-65 and SWMU B-3, CSSA has made a good faith effort to determine if the environmental media contain a listed hazardous waste. CSSA as the generator of potential investigation and remedial wastes cannot determine that the contamination resulted from hazardous waste because documentation regarding a source of contamination, contaminant, or waste is unavailable or inconclusive. USEPA regulations (and TCEQ through the adoption of the federal hazardous waste identification regulations and guidance) provide that CSSA may assume the source, contaminant or waste is not listed hazardous waste and, therefore, provided the material in question does not exhibit a characteristic of hazardous waste, RCRA management requirements for hazardous wastes do not apply.*

As explained in the WMP, there are no known records available that indicate whether a listed waste was ever "land disposed" at CSSA, therefore, CSSA determined that the environmental media does not contain a listed hazardous waste. Additionally, the



contaminant concentrations in groundwater at the planned injection well are below the toxicity levels established by 40 CFR 261.24 Table 1 and referenced under 30 TAC Chapter 335 Subchapter R, and thus is not hazardous by characteristics. Therefore, CSSA has determined that the groundwater that will be extracted and re-injected during the pilot study at SWMU B-3 is not a hazardous waste.

The WMP was reviewed and approved by U.S. EPA Region 6 in 2002 (see attached letter). A revised WMP has been submitted to TCEQ to address concerns related to sampling requirements for characterization of contaminated media.

If you have any further questions regarding the hazardous classification of groundwater at SWMU B-3 or CSSA's Class V Injection Authorization Form, please feel free to contact me at 512-719-6011.

Regards,



Gary Cobb, P.G.  
Parsons

Attachment

cc: Glare Sanchez, CSSA  
James Cannizzo, U.S. Army  
Brian Siegfried, AFCEE  
Brian Vanderglas, Parsons  
File 744223.04