Enclosure No. 1

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: Sonny Rayos,
Team III, Environmental Cleanup Section II
(MC-127), Remediation Division

Date: February 5, 2009

From: John Wilder, Technical Support Section, Remediation Division

Subject: U.S. Army Camp Stanley (CSSA), Boerne, Texas
SWR No. 69026
Review Comments: Section 9, *Affected Property Assessment Report*, dated August 2008

As requested, ecological portions of the above-referenced document have been reviewed. The Screening Level Ecological Risk Assessment (SLERA) contained in Section 9 describes AOC63 as consisting of less than one acre of largely undeveloped land located in the east-central portion of CSSA. No known waste management is associated with AOC63. Soil data is screened to determine chemicals of concern (COCs), with the conclusion that current conditions do not warrant risk management. Below are comments that I expect can be resolved in a detailed response to comments, and incorporated into the subject-document as an addendum.

Comments

1. Section 3 - Assessment Strategy (Surface Water and Sediment), Page 3-4: I concur that existing soil data for AOC63 indicates that a surface water and sediment assessment is not warranted. However, comparison of existing data to critical PCLs (apparently human health based values) and laboratory MQLs is not a sufficient justification due to differences in human and ecological effects levels. No revision to the existing text is necessary, however, please be aware of TCEQ concern that other AOCs at CSSA will likely warrant collection of both surface water and sediment data in order to adequately evaluate these media. I recommend that future project planning incorporate these data needs.

2. Section 9.4.2 TRRP Tier 2 COC Screening Analysis, Page 9-9: Ecological screening benchmarks are not provided for COCs listed with a maximum reported concentration of non-detect (ND). Absent the actual less than reporting value (provided in Table 4D) and the screening benchmark, it is not possible to determine the appropriate disposition of the COC. Although, screening out of non-detected COCs has been practiced previously – it is typically done within the context of the reporting limit and any available screening benchmark, and a discussion provided in the uncertainty analysis for those COCs with reporting limits exceeding the screening benchmark or for those COCs lacking a screening

benchmark. I note that Section 4 - Soil Assessment discusses the SQL for non-detected COCs in relation to their respective critical PCL with supporting justification for COC screening from a human health perspective. Such an approach is appropriate to include in the SLERA from an ecological perspective.

3. Table 9A – AOC63 Surface Soil Sample Ecological Screening: Data are presented as ND and described as not evaluated because results were below the laboratory reporting limit. See Comment No. 2 regarding providing screening benchmarks, when available.

4. Table 9A – AOC63 Surface Soil Sample Ecological Screening: The Table provides a frequency of detection based on 3 samples, but text (Page 9-7) indicates ten surface soil samples were collected from six different locations. Please correct the discrepancy. Further, screening of ecological COCs should include data for the upper five feet of the soil column, rather than exclusively that collected from the upper 6 inches.

Please let me know if there are any questions.