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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 4, 2020

### **Via E-mail**

Mr. Jason Shirley  
Installation Manager  
Camp Stanley Storage Activity  
25800 Ralph Fair Road  
Boerne, TX 78015

Re: Approval of Affected Property Assessment Report - No Further Action  
*Affected Property Assessment Report-SWMU B-2*, dated June 4, 2020  
Camp Stanley Storage Activity, Boerne, Texas  
TCEQ SWR No. 69026; CN602728206; RN100662840  
EPA ID No. TX2210020739

Dear Mr. Shirley:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittal dated June 4, 2020. The submittal addresses munition constituent contamination investigations and remedial actions for solid waste management unit (SWMU) B-2. Historical munitions and explosives of concern and munitions debris have been discovered throughout Camp Stanley Storage Activity (CSSA). Four munition related sites located in the North Pasture, SWMUs B-2, B-8, B20/21, and B-24 encompasses approximately 876 acres in the northeast portion of CSSA outer cantonment. These four sites were grouped with Range Management Unit 1 as they are within the active firing range ricochet area (USEPA, 2012). These sites with potential munition constituents remaining in soil will be addressed when the range is no longer active.

SWMU B-2 is a 2.6-acre site located in the southwest portion of the North Pasture. Historical records indicate the site was a munitions waste disposal area that consisted of two trenches and a third area of waste disposal to the north of the two linear trenches. A series of confirmation sampling and excavations were performed at the site between 2003 - 2010 to remove all affected media from the former disposal trenches and soil within the SWMU B-2 boundary. Munition debris and waste material such as canister lids, burned rifle grenades, empty 75 mm projectiles, 20 mm casings, rifle chips, bolts, stock strap rings, nails, spikes, wire, and metal banding material were sifted from excavated soils.

After excavation soil samples were collected and analyzed for explosives, toluene, di - n - butylphthalate, butylbenzylphthalate, and select metals. Lead and zinc confirmation samples were detected above the CSSA Background values and the Tier 1<sup>GW</sup>Soil<sub>ing</sub> Protective Concentration Levels (PCLs) for a 30-acre residential property. Site-specific, Tier-2 30-acre<sup>GW</sup>Soil<sub>ing</sub> residential PCLs were developed for lead and zinc. Due to the potential endangered bird habitat within ½ mile of the site and zinc concentrations in soils above the Tier 1 ecological benchmark values; Tier 2 ecological PCLs were calculated for lead and zinc. Zinc concentrations in soil were above the Tier 2 ecological benchmark but to ensure protectiveness, soils that were found to have COC concentrations above the TRRP action levels were used to calculate a 95% UCL per TAC 350.79(2)(A) which does not exceed the TRRP critical Protective Concentration Level. Tier 2 results showed lead and zinc values were below the calculated residential and ecological Tier 2 PCLs respectively. A portion of SWMU B-2 is located within the

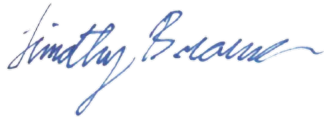
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ricochet area of the active range. Once the active range closes, investigations of SWMU B-2 within the ricochet area and other areas adjacent to the ricochet area must be completed.

Based on our review, the TCEQ concurs that the investigation has been completed in accordance with 30 Texas Administrative Code (TAC) §350.51 and the remediation has been completed in accordance with 30 Texas Administrative Code (TAC) §350.31. ***Considering the findings of the subject report and other available information, TCEQ approves the report with no further action required at this time for the subject site referenced above. However, once range activities cease, the TCEQ shall require further assessment of the range in order for any necessary remediation to take place for range closure, and future property re-use.***

Questions concerning this letter should be directed to me at (512) 239-6526. When responding by mail, please submit one paper copy and one electronic copy (on USB or disc) of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127. An additional copy should be submitted in electronic format to the local TCEQ Region Office. The information in the reference block should be included in all submittals.

Sincerely,



Timothy Brown, Project Manager  
Team 1, VCP-CA Section  
Remediation Division  
Texas Commission on Environmental Quality

TKB/mdh

cc: Ms. Julie Burdy, Parsons Inc., 9101 Burnet Road, Suite 210, Austin, TX 78758  
Via E-mail

Mr. Cameron Lopez, Waste Section Manager, TCEQ Region 13 Office, San Antonio  
Via E-mail