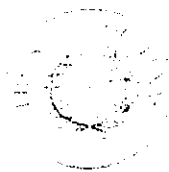


Robert J. Hamilton, Chairman  
 F. B. "Ralph" Marquez, Commissioner  
 Tom M. Baker, Commissioner  
 Jeffrey A. Nohles, Executive Director



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

August 28, 2001

**CERTIFIED MAIL 7000 1670 0013 3388 3727**  
**RETURN RECEIPT REQUESTED**

Lt. Colonel Jason D. Shirley  
 Commanding Officer  
 Camp Stanley Storage Activity  
 25800 Ralph Fair Road  
 Boerne, TX 78015-4800

Re Notice of Violation for the Compliance Evaluation Inspection (CEI) at:  
 Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne (Bexar), Texas  
 SWR#: 69026; EPA ID TX2210020739

Dear Lt. Colonel Shirley:

On July 11, 2001, Ms. Agnieszka Hobson and Mr. Craig Meppen of the Texas Natural Resource Conservation Commission (TNRCC) San Antonio Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for Industrial and Hazardous Waste. Enclosed is a summary which lists the investigation findings. During the investigation, certain outstanding alleged violations and areas of concern were identified for which compliance documentation is required. Please submit to this office by September 27, 2001 a written description of corrective action taken and the required documentation demonstrating that compliance has been achieved for each of the outstanding alleged violations and areas of concern.

In the listing of alleged violations, we have cited applicable requirements, including TNRCC rules. If you would like to obtain a copy of the applicable TNRCC rules, you may contact any of the sources listed in the enclosed brochure entitled "Obtaining TNRCC Rules." Copies of applicable federal regulations may be obtained from either of the following offices:

U.S. Government Printing Office  
 Texas Crude Building  
 801 Travis Street  
 Houston, Texas 77002  
 713/228-1187 (phone)

U.S. Government Printing Office  
 Room 1C-50  
 Federal Building  
 1100 Commerce Street  
 Dallas, Texas 75242  
 214/767-0076 (phone)

The Texas Natural Resource Conservation Commission appreciates your assistance in this matter. Please

(RCC-25680)

REPLY TO: REGION 13 • 14250 JIBSON RD. • SAN ANTONIO, TEXAS 78233-4480 • 210-490-3096 • FAX 210-545-4329

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1900 • Internet address: www.tnrcc.state.tx.us

Lt. Colonel Shirley  
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note that the Legislature has granted TNRCC enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you or members of your staff have any questions, please feel free to contact Ms. Agnieszka Hobson in the San Antonio Region Office at (210) 493-4075.

Sincerely,



Henry Karnei, Waste Section Manager  
San Antonio Region Office  
Texas Natural Resource Conservation Commission

HK/JAMH

Enclosures: Summary of Investigation Findings  
*Obtaining TNRCC Rules*

**SUMMARY OF INVESTIGATION FINDINGS**  
Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne (Bexar), Texas  
SWR#: 69026  
EPA ID: TX2210020739  
Investigation Date: July 11, 2001

**OUTSTANDING ALLEGED VIOLATIONS**

**Summary of Resolved Alleged Violations - 2001 CEI**

1. **30 Texas Administrative Code (TAC) §335.10(b)(1)&(2)/40 Code of Federal Regulations (CFR) 262.20(a) - Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste**

"(b) The manifest shall contain the following information:

(1) The manifest shall contain the generator's United States Environmental Protection Agency (EPA) 12-digit identification number and the unique five-digit number assigned to the manifest by the generator. This requirement does not apply if the waste being shipped is non-hazardous or if the generator is a conditionally exempt small quantity generator of hazardous waste.

(2) The manifest shall contain the total number of pages used to complete the manifest, plus the number of continuation sheets, if any (page 1 of \_\_\_\_\_)."

**Review of hazardous waste manifests generated since the last inspection revealed that there were a few items missing from the documents. Hazardous waste manifests 01901206, 01901253, 01901252, 01901251, 01901250 are missing the manifest document numbers and page numbers. Hazardous waste manifests 01901249 and 02218245 are missing manifest document numbers.**

*On July 30, 2001 the TNRCC San Antonio region office received a copy of two letters (dated July 25, 2001) from CSSA to Texas Ecologists notifying the disposal company of the corrections that needed to be made to the hazardous waste manifests listed above. This violation is considered resolved.*

**SUMMARY OF INVESTIGATION FINDINGS**

Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne (Bexar), Texas

SWR#: 69026

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**Summary of Outstanding Unresolved Alleged Violations - 2001 CEI****2. 30 TAC §335.10(a)(5)/40 CFR 262.20(d)(ref. 40 CFR 263.21(b)) - Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste or Class I Waste and Primary Exporters of Hazardous Waste**

"(a) Except as provided in subsection (g) and (h) of this section, no generator of hazardous or Class I waste consigned to an off-site solid waste process, storage, or disposal facility within the United States or primary exporters of hazardous waste consigned to a foreign country shall cause, suffer, allow, or permit the shipment of hazardous waste or Class I waste unless:

(5) a generator designates on the manifest one facility which is authorized to receive the waste described on the manifest. A generator may also designate one alternative facility which is authorized to receive the waste in the event an emergency prevents delivery of the waste to the primary designated facility. An alternate facility shall be identified on the manifest in the item marked "Special Handling Instructions and Additional Information." If the transporter is unable to deliver the waste to the designated facility or the alternate facility, the generator must either designate another facility or instruct the transporter to return the waste."

Wastes shipped using manifest 02218245 were disposed of using alternate facilities without CSSA's approval. CSSA did not take any steps to notify the transporter company (Why Wastewater?, Inc.) that the generator needs to approve the disposal company before their waste is submitted to a different disposal company not listed on the hazardous waste manifest. CSSA needs to notify the transporter of this violation and submit the documentation to the TNRCC San Antonio office.

**3. 30 TAC §335.13(k)/40 CFR 262.42(a) - Record keeping and Reporting Procedures Applicable to Generators Shipping Hazardous Waste or Class I Waste and Primary Exporters of Hazardous Waste**

"(k) A registered/unregistered generator or primary exporter of hazardous waste subject to §335.76(c) of this title (relating to Additional Requirements Applicable to International Shipments) must submit an exception report to the executive director if he has not received

SUMMARY OF INVESTIGATION FINDINGS  
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a copy of the manifest with the handwritten signatures of the owner or operator of the designated facility within 45 days of the date that the waste was accepted by the initial transporter. The exception report must be retained by the registered/unregistered generator or primary exporter for at least three years from the date the waste was accepted by the initial transporter and must include:

(1) a legible copy of the manifest for which the generator does not have confirmation of delivery; and

(2) a copy of a letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste or Class I waste and the results of those efforts."

No exception report was submitted to the TNRCC Central Office to explain the delay in final disposal of wastes shipped using manifest 02218245. CSSA was required to submit to the TNRCC an exception report if a signed copy of the hazardous waste manifest document (by the disposal company) was not received by the facility within 45 days of the date the waste was accepted by the initial transporter. CSSA needs to complete an exception report for manifest 02218245 and submit the document to the TNRCC Central Office. A copy of the documentation also needs to be submitted to the TNRCC San Antonio office.

4. 30 TAC §335.4 - General Prohibitions / Texas Water Code 26.121

"In addition to the requirements of § 335.2 of this title (relating to Permit Required), no person may cause, suffer, allow, or permit the collection, handling, storage, processing, or disposal of industrial solid waste or municipal hazardous waste in such a manner so as to cause:

(1) the discharge or imminent threat of discharge of industrial solid waste or municipal hazardous waste into or adjacent to the waters in the state without obtaining specific authorization for such a discharge from the Texas Water Commission;

(2) the creation and maintenance of a nuisance; or

**SUMMARY OF INVESTIGATION FINDINGS**  
Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne (Bexar), Texas  
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(3) the endangerment of the public health and welfare."

The following discharges were documented during the inspection:

- A) Wheel abrator discharge located in front of building 90-2
- B) Wheel abrator discharge located on the side of building 90-2 facing building 90
- C) Mop water discharge located on the side of building 90 facing building 90-2
- D) Nickel penetrate discharge from the pipes that previously led to hazardous waste storage tanks that were located outside building 90-1

CSSA needs to evaluate the extent of the contamination caused by the above listed unauthorized discharges and remediate any contamination that might be present. The documentation relating to the delineation and remediation of the discharges needs to be submitted to the TNRCC San Antonio region office.

5. 30 TAC §335.6(e) - Notification Requirements.

"(c) Any person who generates hazardous waste in a quantity greater than the limits specified in §335.78 of this title (relating to Special Requirements for Hazardous Waste Generated by Conditionally Exempt Small Quantity Generators) in any calendar month or greater than 100 kilograms in any calendar month of industrial Class 1 waste shall notify the executive director of such activity using electronic notification software or paper forms provided by the executive director... Any person who provides notification pursuant to this subsection shall have the continuing obligation to immediately document any changes or additional information with respect to such notification and within 90 days of the occurrence of such change or of becoming aware of such additional information, provide notice to the executive director in writing or using electronic notification software provided by the executive director, of any such changes or additional information to that reported previously... The information submitted pursuant to the notification requirements of this subchapter and to the additional requirements of §335.503 of this title (relating to Waste Classification and Waste Coding Required) shall include, but is not limited to:

**SUMMARY OF INVESTIGATION FINDINGS**  
**Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne (Bexar), Texas**

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- (1) a description of the waste;
- (2) a description of the process generating the waste;
- (3) the composition of the waste;
- (4) a proper hazardous waste determination which includes the appropriate EPA hazardous waste number(s) described in 40 Code of Federal Regulations Part 261. Generators must determine whether such waste is hazardous as defined in 40 Code of Federal Regulations Part 261 and submit the results of that hazardous waste determination to the executive director;
- (5) the disposition of each solid waste generated, if subject to the notification requirement of this subsection, including the following information:
  - (A) whether the waste is managed on-site and/or off-site;
  - (B) a description of the type and use of each on-site waste management facility unit;
  - (C) a listing of the wastes managed in each unit;
  - (D) whether each unit is permitted, or qualifies for an exemption, under §335.2 of this title (relating to Permit Required)..."

During the inspection a Solvent Recovery System was observed in Building 90-1. The system is a continuous feed recycling unit. Waste (solvent residues) generated by this system is classified as ignitable (D001) hazardous waste (waste code 4011609H). Conversations with Mr. Murphy indicated that this system has not been operational for several months and that a vendor comes out to CSSA to recycle any spent solvent in the interim. Review of the facility Notice of Registration (NOR) revealed that the waste cleaning solvent (the liquid recycled) is not listed as a waste stream. A violation was cited for failing to list the waste cleaning solvent on the NOR, along with the waste management unit used to store the waste, and the disposition of the waste. The facility needs to add this waste stream to the NOR and submit documentation to the TNRCC San Antonio region office showing the correction of this violation.

**SUMMARY OF INVESTIGATION FINDINGS****Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne (Bexar), Texas****SWR#: 69026****EPA ID TX2210020739****Investigation Date: July 11, 2001****Page 6****6. 30 TAC §335.70 - Recordkeeping**

(b) The generator shall keep a copy of each annual report and exception report required by this title for a period of at least three years from the due date of the report.

The facility was not able to provide a record of the 1998 annual waste summary at the time of the July 11, 2001 CEI. CSSA needs to obtain a copy of the filed summary and submit the documentation to the TNRCC San Antonio region office.

**7. 30 TAC §335.513(c)/40 CFR §262.40(c) - Documentation Required**

(c) The following documentation shall be maintained by the generator on-site immediately upon waste generation and for a minimum of five years after the waste is no longer generated or stored or until site closure:

(1) all information required under subsection (b) of this section;

(2) all analytical data and/or process knowledge allowed under §335.511 of this title (relating to Use of Process Knowledge) used to characterize hazardous, Class 1, Class 2, and Class 3 wastes, including quality control data."

During the inspection, CSSA did not provide hazardous waste determination documentation for contaminated groundwater and other wastes generated during investigation and remediation activities, including the soils generated during remediation at the Oxidation Pond (SWMU No. 004) site, soils generated during boring and well installation, and well development and purge water. The waste determination documentation needs to be submitted to the TNRCC San Antonio office.

**Areas of Concern - 2001 CEI**

A. CSSA needs to evaluate their NOR and confirm that all of the information is current. During the July 11, 2001 CEI several waste streams were not correctly described.



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- B. CSSA needs to make sure that the activated charcoal from the groundwater treatment system is properly characterized (hazardous or non-hazardous) prior to disposal. In case the waste charcoal is found hazardous CSSA needs to assign a waste stream number and add the information to the NOR. The facility needs to evaluate their generator status with regards to the volume of hazardous waste generated once the charcoal is disposed of.
- C. The facility needs to submit a copy of the notification letter sent to the laundry service (providing the washing of the solvent contaminated rags) to the TNRCC San Antonio region office. Before the rags are washed the laundry facility needs to be notified what the contamination chemical is.
- D. During the July 11, 2001 CEI a roll-off container was observed with an incorrect label. A hazardous waste label identified the generator as Kelly AFB. CSSA needs to make sure that all of the incorrect labeling is removed from containers prior to use.
- E. Conversations with Mr. Murphy indicated that waste gasoline was disposed of from the Motor Pool area. CSSA needs to provide the TNRCC San Antonio region office with a copy of the hazardous waste manifest used for shipment of the waste gasoline for disposal.
- F. Conversations with Mr. Murphy indicated that wipe samples have been collected from Building 40 (SWMU No. 002). The facility needs to evaluate the possibility of collecting concrete chip samples to better evaluate the extent of contamination, if any. The documentation regarding any future sampling needs to be submitted to the TNRCC San Antonio region office.
- G. The TNRCC San Antonio region office is requesting CSSA to provide a summary listing the EPA 3008(h) order deliverables with the required submittal dates, along with the dates the deliverables were submitted to EPA and/or TNRCC. This type of summary will be useful to ensure that all deliverables are submitted as required by the EPA 3008(h) order.
- H. Mop water from building 90 needs to be disposed of down the sanitary sewer.
- I. The facility did state that a Source Reduction and Waste Minimization Plan was prepared for the CSSA installation, however it was not reviewed at the time of the CEI. The TNRCC is requesting a copy of the plan to be submitted to the San Antonio office.

**SUMMARY OF INVESTIGATION FINDINGS**

**Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne (Bexar), Texas**

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- J. Well 16 pump test discharge issues are currently under TNRCC review and will be addressed in a later report. Additional violations and/or areas of concern may result from that review.
- K. CSSA did not provide hazardous waste handling training records for Mr. Brian Murphy. CSSA needs to submit the training records. Mr. Murphy needs to obtain hazardous waste training annually due to the position being held by Mr. Murphy at the installation.
- L. CSSA needs to submit a copy of the sample results for the split samples collected during the Sampling Inspection conducted on April 8, 2000 by Mr. Malcolm Ferris, TNRCC San Antonio office investigator.

# Texas Natural Resource Conservation Commission Inspection Report

**Camp Stanley Storage Activity, Boerne**  
**TNRCC ID # 69026, EPA ID # TX2210020739**  
**IHW-CEI Conducted July 11, 2001;**  
**Sample Results Reported (OTH 22) from Sampling Inspection**  
**Conducted April 8, 2000**  
**Report Dated August 28, 2001**

## Introduction:

On June 1, 2001, Mr. Brian K. Murphy, CSA Environmental Officer for Camp Stanley was contacted to schedule a Compliance Evaluation Inspection (CEI) for July 11, 2001 at 9:00 am. On July 11, 2001 an announced CEI was performed at the Camp Stanley Storage Activity (CSSA) facility by Ms. Agnieszka M. Hobson and Mr. Craig E. Meppen. The purpose of the inspection was to determine the facility's compliance with applicable waste management regulations. Prior to the site inspection, an in-briefing was held with Commanding Officer Jason D. Shirley, Mr. Murphy and several of the CSSA personnel involved in facility operations (Attachment 16). Review of the TNRCC TRACS Database (Attachment 1) indicated that CSSA is listed as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste under Registration Number 69026. Review of EPA databases revealed that CSSA is listed as a SQG, a treatment/storage (T/S) facility, and as a transporter of hazardous waste under EPA ID TX2210020739. The T/S listing reflects the EPA's enforcement order for the unpermitted thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) which was conducted at CSSA until 1987 in the open burning/open detonation (OB/OD) area identified as B-20. The transporter listing reflects facility hazardous waste transportation activities; however, according to Mr. Murphy, CSSA is not a transporter of hazardous waste anymore. An exit interview was held on July 19, 2001; a list of participants can be found in Attachment 17. The following violations were discussed during the exit interview: several hazardous waste manifests were incorrectly completed, four unauthorized discharges were observed during the inspection, the facility's NOR did not correctly reflect the waste streams generated on site, and hazardous waste determination documentation was not present on site for the contaminated groundwater and other wastes generated during the investigation and remediation activities being conducted at the facility. The areas of concern discussed were: general update of the facility's NOR, proper classification of wastes generated during remediation activities (activated charcoal), notification of the laundry service about the contaminant on the rags being serviced, proper labeling of waste storage containers on site, disposal documentation for waste gasoline, the disposal of mop water from Building 90 into the sanitary sewer, the presence of the Source Reduction and Waste Minimization Plan on site, well 16 pump test discharge issues, chip samples collected at Building 40, and a summary of EPA 3008(h) order submittals.

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Review of the Resource Conservation Recovery Information System (RCRIS) Compressed Compliance Monitoring and Evaluation Log (CMEL) dated June 25, 2001 (Attachment 2) revealed that CSSA had been issued a Consent Agreement and Consent Order (CACO) on June 30, 1993, and that this CACO was resolved, with penalties and Supplemental Environmental Projects (SEP), on May 21, 1996. The CACO had been issued due to the use (through 1987) of an unpermitted open burn/open detonation facility (B-20) for the disposal of reactive (D003) hazardous waste ordnance. At present, B-20 is undergoing closure under a partial facility closure plan approved by the EPA and the TNRCC.

Review of the TNRCC Total Closure Log (dated 07/02/1998) revealed 5 entries for U.S. Army Camp Stanley Storage Activity were present.

Project No. 4087, identified as F-14, (the less than 90 day accumulation container storage area) is listed as closed;

Project No. 3576 (identified as the B-20 OB/OD area) is listed as an on-going closure project;

Project No. 4246 (identified as 19 Solid Waste Management Units) is listed as an on-going closure project;

Project No. 4666, (partial closure for Building 40 container storage area) is listed as an on-going closure project; and

Project No. 4759 (subsurface investigation of unexploded ordnance (UXO)) is listed as an on-going closure project.

New Remediation Division database printout (dated June 27, 2001) does not separate out the different Solid Waste Management Units (SWMUs) (Attachment 42).

### General Facility and Waste Process Information

CSSA is administrated by the Red River Army Depot (RRAD). The primary mission of CSSA is the receipt, storage, issue and maintenance of ordnance materiel, as well as quality assurance testing and maintenance of military weapons and ammunition. Due to the storage and testing of explosive ordnance, access to the installation is restricted. Operational buildings and storage magazines (igloos) are located within the inner cantonment, and the outer cantonment is primarily undeveloped open range. CSSA also has an agreement with the U.S. Department of Agriculture (USDA) Agricultural Research Service which permits cattle grazing on CSSA land. CSSA personnel and/or retired personnel are allowed to hunt wildlife on a restricted basis.

During the site visit, the Field Investigator reviewed the areas of the CSSA facility identified by the operators as locations where hazardous wastes were currently managed and some locations where hazardous wastes were previously managed. The tour of the facility was conducted by Mr. Murphy.

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The facility tour included Building 90 (weapons maintenance operations), adjacent Buildings 90-1 (bluing operations/solvent recovery) and 90-2 (sand blasting), Building 4 (motor pool), Building 40 (former <90-day container storage area), Building 86 (current <90-day container storage area and non-hazardous waste storage), Warehouse 93 ("pharmacy" building for hazardous materials product distribution); SWMU No. 004 (oxidation pond); and SWMU No. 005 (B-20, OB/OD). The site where a portion of the non-hazardous soil from SWMU No. 005 is being used in a phosphate induced metal stabilization (PIMS) demonstration near the old oxidation pond site was also visited during the CEI. Review of the facility's records was conducted on the same day, in the office of Mr. Murphy.

#### Building 90 - Weapons Maintenance Operations

Most of the waste generating activities are conducted as part of the weapons maintenance operations which is located in Building 90. This building is a large structure constructed in the 1930's as part of a WPA project. The building was used during World War II for munitions manufacturing and assembly. During the inspection of Building 90, the investigator was accompanied by representatives of the building and Mr. Murphy. The weapons maintenance activities involve cleaning, testing and packaging for storage of various general issue firearms. Most of the cleaning equipment and work areas are located along the west wall of the main operations area of the building. Two vats of cold solvent and a drip collection container were observed along the northwest end of the main operations area of the building. An additional cold solvent vat and a parts washing unit were observed in the southwest end of the main operations area of the building. A small bead blasting unit, washing machine units, and satellite accumulation of waste streams generated by the cleaning activities are also located in the southwest portion of the main operations area. Test firing of weapons is conducted in a small room located on the east side of the main operations area in Building 90. A modified door to a small chamber on the south wall of this room allows the tester to insert the weapon into the chamber. The south wall of the chamber is packed with sand to catch the bullets. The sand from this operation is generated as a solid waste (waste code 4006319H) only once or twice in a decade. The Washing Equipment of Texas (WET) brand washing system was installed to replace a tetrachloroethylene (PCE) and trichloroethylene (TCE) degreasing system in 1997. The old PCE/TCE degreaser had been operated over a sump since the 1950's. Previous conversations with Mr. Murphy indicated that the degreasing system most likely (possibly) consisted of a "hot tank". In addition no testing to detect the presence of contamination from the operation of the unit had been performed prior to covering the sump (with a metal plate), above which the unit had been located. This sump was addressed as an Area of Concern in the 1997 CEI and was readdressed as an Area of Concern in the 1999 CEI. The concern stemmed from the fact that the chlorinated solvent degreasing system operated in the same location for over 40 years. On April 8, 2000, TNRCC San Antonio Regional Office staff, Malcolm A. Ferris, collected soil samples from areas of suspected trichloroethylene (TCE) contamination located beneath and west of Building 90 on the CSSA property. These samples were collected as part of the RCRA facility investigation requirements which were included in the U.S. Environmental Protection Agency's 3008(h) Order

Camp Stanley Storage Activity ; Boerne

TNRCC ID No. 6902b

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signed by the U.S. Department of the Army on May 5, 1999, and also to address a reported off-site detection of TCE in groundwater at a residence located on Curres Circle, to the southwest of Building 90. The analytical results of the samples taken are discussed below.

Mop water discharge was observed on the side of building 90-2 facing building 90 during the CEI. Due to the operations conducted inside the building the mop water from cleaning the building 90 floor could possibly contain contaminants. The water should be discharged into the sanitary sewer, not onto the soil.

#### Building 90-1

On the east side of Building 90 are two support buildings, 90-1 and 90-2. Building 90-1 is the Bluing Shop where firearms are chemically treated to produce the jet-black finish on the metal parts. Two tanks contained sodium hydroxide, one tank contained water, and one tank contained a light weight oil. The remaining three tanks were empty and not in use. Conversations with Mr. Murphy indicated that the bluing operation is rarely used. Liquids remaining in the sodium hydroxide tanks were observed to be low in volume and developing a layer of scale on the surface. Adjacent to and north of the Bluing Shop is a small shed where a Solvent Recovery System is located. The system is a continuous feed recycling unit. Waste (solvent residues) generated by this system is classified as ignitable (D001) hazardous waste (waste code 4011609H). Conversations with Mr. Murphy indicated that this system has not been operational for several months and that a vendor comes out to CSSA to recycle any spent solvent in the interim. Review of the facility NOR revealed that CSSA does not list the gun cleaning solvent solution as a waste stream before it is recycled in the Solvent Recovery System. Mr. Murphy was notified that failure to add the spent solvent solution waste stream to the facility's NOR would be cited as a violation. On the east side of the building an unauthorized discharge of caustic bluing solution was observed (Attachment 3, Photo 6, 7, and 8). Apparently in the past years hazardous waste storage tanks were present on the side of the building. After removal of the tanks, piping was left outside of the building still connected to the bluing tanks inside. TNRCC San Antonio Region Office personnel checked the pH of the solution (nickel penetrant) in the bluing tank with Litmus Paper; the resulting pH measurement was 14 (highly caustic). A Material Safety Data Sheet for the nickel penetrant is included as Attachment 8. Mr. Murphy was informed that the discharge will be cited as a violation and will need to be remediated.

#### Building 90-2

Building 90-2 is identified as the Sand Blast Shop. This building was observed to hold a wheelabrator (reportedly operational but not used since 1996) and other equipment in storage, including sand blasting machines, glass bead tumbler, and a metal bead blaster. The equipment in this building is used in the polishing and finishing of military equipment. Conversations with Mr. Murphy indicated that the equipment in Building 90-2 has not been used for some time. On the west side of the building several unauthorized discharges of the wheelabrator compound were noted (Attachment 3, Photo 1, 2, 3, 4, and 5). Mr. Murphy was notified that CSSA will need to remediate

Camp Stanley Storage Activity - Boerne

TNRCC ID No. 69026

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the affected areas.

#### Building 4 Motor Pool

Building 4 Motor Pool is used to service and maintain tractors and various other machinery located at CSSA. Conversations with Mr. Murphy indicated that the CSSA vehicle fleet was administrated under General Services Administration (GSA) contracts and not in Building 4. Wastes generated and/or handled by the motor pool included used oil, used oil filters, off-specification fuels (gasoline and diesel), used antifreeze, used tires, used absorbent and used rags. Discussions with Mr. Murphy indicated that CSSA might use their waste gasoline and waste diesel as fuel for prescribed vegetation burning. The waste gasoline and waste diesel would not be considered as waste if the substances were used as fuel. The containers of used oil and used oil filters were observed to be properly labeled and provided with secondary containment. The used antifreeze is accumulated in a 55-gallon drum which was labeled as non-hazardous waste. Used tires are generated from tractors and machinery vehicles only. Absorbent used in the general clean up of small spills is accumulated in a 55-gallon drum which is labeled as non-hazardous waste. The used rags generated from other area of CSSA are all collected at the motor pool as a centralized point for pick-up by the laundry service. Adjacent to the motor pool is CSSA's paint booth building. This building is currently closed.

#### Building 40

Building 40 is the former less than 90 day hazardous waste storage area which is not being used and is in the process of being closed by the facility operators. At present the building has gone through a wipe sampling event. The concrete floor of the building has been investigated to determine whether releases occurred while it was in use. Mr. Murphy was notified that additional sampling of the building floor may be required because the TNRCC generally does not accept wipe tests as documentation of closure for a concrete floor. The sampling should be done by collecting chips of the concrete. The building is located off of Tompkins Road approximately one-half mile north of Building 90. This building is listed on the facility NOR as SWMU No. 002.

#### Building 86

Building 86 is the current less than 90 day hazardous waste storage area operated by the facility. This building consists of four cells that are equipped with secondary containment systems. The walls are metal and are equipped with water and chemical (dry powder) fire extinguishing systems. Although the building is not equipped with a telephone, the names of the emergency coordinators are posted on the front (east side) of the unit. It is noted that the CSSA personnel are provided with radios and/or cellular phones and that the nearest telephone is located in the Pharmacy area of Warehouse 93. Cell #1 contained a spill kit. Cell #2 was empty. Cell #3 contained 1 55-gallon drum of rags, 1 55-gallon drum of waste paint and product. Cell #4 contained asbestos and product.

#### Warehouse 93

The Pharmacy Building (Warehouse 93) is located to the south of Building 90. Non-hazardous

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recyclable materials are accumulated in the main part of the warehouse; these include paper, cardboard, plastic, styrofoam, glass and (light) metals. The CSSA Pharmacy is the centralized distribution and receiving office for all hazardous material products and for all wastes generated by the facility's normal activities, with the exception of the dirty rags, used oil, used oil filters, used antifreeze and used tires which are handled through the motor pool. One 55-gallon drum of used paint thinner was observed as a satellite accumulation area in Warehouse 93.

#### F-14 Container Storage Area SWMU No. 001

According to TNRCC Total Closure Log (dated 07/02/1998) and the CSSA NOR the F-14 container storage area is listed as closed.

#### B-20 Open Burn/Open Detonation SWMU No. 005

The Open Detonation/Open Burn (Thermal Processing Unit) or B-20 is the area identified by the EPA's enforcement order for the unpermitted thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) activities which were conducted at CSSA until 1987 in the open burning/open detonation (OB/OD) area. This area, also identified as SWMU No. 005 encompassed an area of approximately 33 acres. Portions of B-20 have been swept for unexploded ordnance (UXO), after which swept material was then sifted to remove ordnance, shrapnel and scrap metal fragments. The sifting activities were conducted between April and May 1997. As a result of the sifting activities, approximately 5 stockpiles of soil containing residual scrap metal fragments, shrapnel, and bullets were generated. These stockpiles were observed during the 1999 inspection. When asked about generating a possible hazardous waste (from the sweeping and sifting activities), Mr. Murphy indicated that a hazardous waste determination has been performed on the stockpiled material. July 1999 hazardous waste manifests (Attachment 12) indicated that the hazardous wastes were shipped off site. The remaining stockpile was identified as non-hazardous and is being used as part of the PIMS demonstration. The remediation/management of the stockpiles is being addressed under the 3008(h) order. Details of the 3008(h) Order are discussed below. On September 29, 1998 an Addendum to Field Sampling Plan and Quality Assurance Plan (Waste Analysis Plan) for stabilization was received in the TNRCC San Antonio office. Currently the sifted soil pile at the B-20 location is undergoing a Treatability Study and part of the soil is used in the PIMS demonstration (Attachments 15 (this was in 1999), 28, and 3, Photo 10).

#### Oxidizing Pond SWMU No. 004

The Oxidizing Pond (O-1, surface impoundment), identified as SWMU No. 004, consisted of an open gravel covered area. The former oxidation pond or surface impoundment reportedly only received office waste generated at the CSSA. At the time of the 1999 CEI investigation of this unit following the detection of chlorinated solvents in a down gradient drinking water well found high concentrations of tetrachloroethylene in the soils of the unit. These concentrations indicated that hazardous waste remained contained in the soils of the unit. A treatability study, using electrodes



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the background range according to the "Evaluation of Background Metals Concentrations in Soil Types at CSSA" report submitted to the TNRCC San Antonio Regional Office on July 21, 1997 (According to the information provided on page 11 of Attachment 31, a new background metals report is being prepared and should be completed by October 2001). No volatile compounds were detected. Pending finalization of the new background study, it appears that the soils in this sample have not been affected by activities performed at Camp Stanley.

The remediation of the Bldg. 90 discharges is addressed in the U.S. Environmental Protection Agency's 3008(h) Order.

Copies of the split sample results obtained by CSSA were never submitted to the TNRCC San Antonio Region office. This issue is addressed as an area of concern.

#### Records Review

Review of hazardous waste manifests generated since the last inspection revealed that there were a few items missing from the documents. Hazardous waste manifests 01901206, 01901253, 01901252, 01901251, 01901250 are missing the manifest document numbers and page numbers (Attachment 12). Hazardous waste manifests 01901249 and 02218245 are missing manifest document numbers. Wastes shipped using manifest 02218245 were disposed of using alternate facilities without CSSA's approval (Attachment 30). No exception report was submitted to the TNRCC Central Office to explain the delay in final disposal of wastes shipped using manifest 02218245. All of the above manifest issues will be addressed as violations. The facility was also able to provide the Annual Waste Summaries for the past 2 years of operation. The 1998 Annual Waste Summary was submitted to the TNRCC, however the facility did not have the record on site. Copy of the year 2000 Annual Waste Summary is provided in Attachment 5. The facility was asked to provide hazardous waste determinations for the waste streams on the Notice of Registration. "CSSA Waste Stream Analysis Summary" is provided in Attachment 6. One of the waste streams (spent weapons cleaning solvent) generated by the facility is not on the NOR. CSSA was advised to update the facility's NOR with the most current information available. The facility was also able to provide the "Installation Contingency Plan" (Attachment 13 and 14) and hazardous waste employee training (Attachment 19). However, Mr. Murphy did not provide a copy of his training records. This issue will be addressed as an area of concern. The facility did state that a Source Reduction and Waste Minimization Plan was prepared for the CSSA installation, however it was not reviewed at the time of the CEI. The submittal of the plan will be requested as one of the areas of concern in the Notice of Violation send to the facility after completing the CEI report.

#### Additional Information

CSSA is currently conducting remediation activities at 39 SWMUs located throughout the facility.

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and acid (a mixture of hydrochloric and citric acids) to treat the organic solvents in place by electrolytic induction was completed in 1997. The remediation of the oxidation pond is specifically addressed in the 3008(h) Order. The status of the remediation activities can be found in Attachment 15 (this was in 1999) and 3, Photos 15 and 16). The contaminated soil material was removed between July 11, 2000 thru August 18, 2000. Clean backfill material was brought in and the site was capped. Mr. Murphy indicated no PCE was detected during remediation, so soil was shipped off as non-hazardous for disposal. Mr. Murphy indicated that closure documentation was submitted to the TNRCC in October, 2000, however the TNRCC San Antonio Region office has not received any closure documentation regarding the site.

A map illustrating satellite accumulation areas, hazardous materials storage and spill kits at CSSA is included as Attachment 10. July 11, 2001 CEI field notes are included as Attachment 4. TNRCC customer survey signature form is included as Attachment 18.

#### Sampling Inspection Conducted on April 8, 2000

Six soil samples were collected on April 8, 2000, and were submitted to Severn Trent Laboratories on April 10, 2000. Additional information regarding the sampling inspection can be found in Attachment 24. The samples were received at Severn Trent Laboratories on April 10, 2000. The samples were analyzed for RCRA 8-metals and Toxicity Characteristic Leaching Procedure (TCLP) 8 metals if warranted, Total Copper, Total Nickel, Total Zinc, Volatile Organic Compounds and Library Search for Tentatively Identified Compounds (TICs). Analytical results are also summarized in the Sample Results Table (Attachment 23). Severn Trent Laboratories Analytical Results for samples collected during the April 8, 2000 sampling inspection conducted at CSSA are included as Attachment 22

Sample No. 000391-01 was a trip blank prepared in the San Antonio Regional Office laboratory. The de-ionized water from Regional Office laboratory was collected into two volatile organic bottles (40 ml each) and a one 1-quart glass jar with teflon lined lid. The sample was submitted to Severn Trent Laboratories for analysis of RCRA 8-metals and Toxicity Characteristic Leaching Procedure (TCLP) 8 metals if warranted, Total Copper, Total Nickel, Total Zinc, Volatile Organic Compounds and Library Search for Tentatively Identified Compounds (TICs).

Review of the analytical report revealed that the RCRA 8-metals, Total Copper, Total Nickel, and Total Zinc were all under the reporting limit (0.05 mg/L). Volatile Organic Compounds were not detected in the trip blank sample.

Sample No. 000391-02 was a soil sample collected from the southeast end of the sump inside Bldg. 90 (0.5-1.0 feet below the ground surface). The split sample was collected by contractors for the US Army. The VOC sample was placed in a 250 ml glass jar and the metals sample was placed in a 1-

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quart glass jar with a teflon lined lid. The sample was submitted to Severn Trent labs for analysis of RCRA 8-metals and Toxicity Characteristic Leaching Procedure (TCLP) 8 metals if warranted, Total Copper, Total Nickel, Total Zinc, Volatile Organic Compounds and Library Search for Tentatively Identified Compounds (TICs).

Review of the analytical report reveals that the sample contains a total barium of 64 mg/Kg; total chromium of 13 mg/Kg; total copper of 8 mg/Kg; total lead of 9 mg/Kg; total nickel of 10 mg/Kg; total zinc of 19 mg/Kg. The above listed total metals levels are all within the background range according to the "Evaluation of Background Metals Concentrations in Soil Types at CSSA" report submitted to the TNRCC San Antonio Regional Office on July 21, 1997 (According to the information provided on page 11 of Attachment 31, a new background metals report is being prepared and should be completed by October 2001). The sample also contains levels of Tetrachloroethene (PCE) of 1200ug/Kg, which is above the reporting limit (500 ug/Kg). The high level of PCE indicates discharges of the chemical into the area surrounding Bldg. 90.

Sample No. 000391-03 was a soil sample collected from the northwest corner of the sump inside Bldg. 90 (0.5-1.0 feet below ground surface). The split sample was collected by contractors for the US Army. The VOC sample was placed in a 250 ml glass jar and the metals sample was placed in a 1-quart glass jar with a teflon lined lid. The sample was submitted to Severn Trent labs for analysis of RCRA 8-metals and Toxicity Characteristic Leaching Procedure (TCLP) 8 metals if warranted, Total Copper, Total Nickel, Total Zinc, Volatile Organic Compounds and Library Search for Tentatively Identified Compounds (TICs).

Review of the analytical report reveals that the sample contains a total arsenic of 7 mg/Kg; total barium of 85 mg/Kg; total chromium of 15 mg/Kg; total copper of 7 mg/Kg; total lead of 10 mg/Kg; total nickel of 11 mg/Kg; and total zinc of 15 mg/Kg. The above listed total metals levels are all within the background range according to the "Evaluation of Background Metals Concentrations in Soil Types at CSSA" report submitted to the TNRCC San Antonio Regional Office on July 21, 1997 (According to the information provided on page 11 of Attachment 31, a new background metals report is being prepared and should be completed by October 2001). The sample also contains levels of Tetrachloroethene (PCE) of 2400 ug/Kg, which is above the reporting limit (500 ug/Kg). The high level of PCE indicates discharges of the chemical into the area surrounding Bldg. 90.

Sample No. 003526-04 was a soil sample collected at the drainage swale across the road from the overhead door on the west side of Bldg. 90 (0.5-1.0 feet below ground surface). The split sample was collected by contractors for the US Army. The VOC sample was placed in a 250 ml glass jar and the metals sample was placed in a 1-quart glass jar with a teflon lined lid. The sample was submitted to Severn Trent labs for analysis of RCRA 8-metals and Toxicity Characteristic Leaching Procedure (TCLP) 8 metals if warranted, Total Copper, Total Nickel, Total Zinc, Volatile Organic Compounds and Library Search for Tentatively Identified Compounds (TICs).

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Review of the analytical report reveals that the sample contains a total barium of 12 mg/Kg; total copper of 6 mg/Kg; total lead of 27 mg/Kg; total zinc of 21 mg/Kg. The above listed total metals levels are all within the background range according to the "Evaluation of Background Metals Concentrations in Soil Types at CSSA" report submitted to the TNRCC San Antonio Regional Office on July 21, 1997 (According to the information provided on page 11 of Attachment 31, a new background metals report is being prepared and should be completed by October 2001). The sample also contains levels of n-Butylbenzene of 27 ug/Kg; sec-Butylbenzene of 18 ug/Kg; and 1,2,4-Trimethylbenzene of 14 ug/Kg. The TICs analysis revealed the following results: C10H22 of 172 ug/Kg; 2,6-dimethyl Octane of 94 ug/Kg; propyl Cyclohexane of 190 ug/Kg; 4-methyl Nonane of 110 ug/Kg; C8H16 of 600 ug/Kg; Unknown Compounds of 1200 ug/Kg; C10H14 of 2780 ug/Kg; C10H12 of 131 of ug/Kg; and C11C24 of 1550 ug/Kg. No chlorinated solvents were detected in the sample; only petroleum product constituents from an unknown source.

Sample No. 000391-05 was a soil sample collected at the drainage swale across the road from the overhead door on the west side of Bldg. 90 (13.0-13.5 feet below ground surface). The split sample was collected by contractors for the US Army. The VOC sample was placed in a 250 ml glass jar and the metals sample was placed in a 1-quart glass jar with a teflon lined lid. The sample was submitted to Severn Trent labs for analysis of RCRA 8-metals and Toxicity Characteristic Leaching Procedure (TCLP) 8 metals if warranted, Total Copper, Total Nickel, Total Zinc, Volatile Organic Compounds and Library Search for Tentatively Identified Compounds (TICs).

Review of the analytical report reveals that the sample contains a total barium of 7 mg/Kg; total chromium of 7 mg/Kg; total nickel of 6 mg/Kg; and total zinc of 13 mg/Kg. The above listed total metals levels are all within the background range according to the "Evaluation of Background Metals Concentrations in Soil Types at CSSA" report submitted to the TNRCC San Antonio Regional Office on July 21, 1997 (According to the information provided on page 11 of Attachment 31, a new background metals report is being prepared and should be completed by October 2001). No volatile compounds were detected. Pending finalization of the new background study, it appears that the soils in this sample have not been affected by activities performed at Camp Stanley.

Sample No. 000391-06 was a soil sample collected at the drainage swale across the road from the overhead door on the west side of Bldg. 90 (0 to 2.0 feet below ground surface). The split sample was collected by contractors for the US Army. The sample was collected with a brass sleeve to a split-spoon sampler. The sample was submitted to Severn Trent labs for analysis of RCRA 8-metals and Toxicity Characteristic Leaching Procedure (TCLP) 8 metals if warranted, Total Copper, Total Nickel, Total Zinc, Volatile Organic Compounds and Library Search for Tentatively Identified Compounds (TICs).

Review of the analytical report reveals that the sample contains a total barium of 16 mg/Kg; total copper of 7 mg/Kg; and total zinc of 11 mg/Kg. The above listed total metals levels are all within

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A map illustrating areas of contamination throughout CSSA is included as Attachment 9. A Work Plan and Sampling Analysis Plan for SWMU closure of these units was submitted on February 29, 1996. These plans separated the SWMUs into low, medium, and high priority status and proposed remedial activities for the individual sites. The following SWMUs were inspected during this CEI: Building 40 (SWMU No. 002), B-20 Open Burn/Open Detonation (SWMU No. 005), and the Oxidizing Pond, O-1 (SWMU No. 004). Solid Waste Management Unit Status Table as of 1999 is included as Attachment 15. CSSA Monitoring Well Volatile Analytical Compounds Analytical Results are included as Attachment 7.

The EPA has approved to use 30,000 gallons of well 16 groundwater for the PIMS demonstration located near SWMU No. 004 (Attachment 21). Any additional discharge to the ground is not covered in the EPA letter. On 07/19/01 the facility was told by TNRCC San Antonio Region that treated wastewater would have to be discharged to the permitted outfall or the permitted irrigation area unless the wastewater permit was amended, or the facility obtained authorization under 30 TAC 210.E. wastewater reuse regulations. This issue will be addressed in greater detail at a later date in another report.

Copy of the CSSA TPDES permit for treatment and disposal of wastes is included as Attachment 11. The TNRCC San Antonio Region is concerned with the discharge limit specified in the TPDES permit (77 ppb). The groundwater treatment system (Granulated Activated Charcoal (GAC)) is shown in Attachment 3, Photos 11 and 12. Photo 13 in Attachment 3 shows containers used to store groundwater before it is treated using the GAC system. One of the roll-off containers was observed with an incorrect label (Attachment 3, Photo 14). A hazardous waste label identified the generator as Kelly AFB. CSSA needs to make sure that all of the incorrect labeling is removed from containers prior to use. This issue is addressed as an area of concern in this report.

CSSA is in the process of evaluating the groundwater contamination on site and off-site. During the CEI the investigators observed Monitoring Well #7 being installed East of W92. Monitoring well #7 installation is shown in Attachment 3, Photo 9.

### Background

On May 21, 1999 TNRCC San Antonio office received a copy of a letter (dated May 17, 1999) from CSSA to EPA Region 6 office. The letter notified about the appointment of Brian K. Murphy, CSP as the Project Manager for RCRA 3008(h) Administrative Order (Attachment 32).

On June 23, 1999 TNRCC San Antonio office received a letter (dated June 17, 1999) from CSSA in response to the TNRCC letter (dated May 18, 1999) regarding the findings of the Compliance Evaluation Inspection and Sampling Inspection of April 7-8, 1999 (Attachment 41).

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On July 23, 1999 TNRCC San Antonio office received a copy of a letter (dated July 19, 1999) from the TNRCC to CSSA regarding the Investigation Report for Area of Concern 36 (Attachment 33)

On October 7, 1999 TNRCC San Antonio office received a copy of a letter (dated October 5, 1999) from the TNRCC to CSSA regarding the Items for TNRCC review and approval, dated July 12, 1999 (Attachment 34).

On February 11, 2000 TNRCC San Antonio office received a copy of a letter (dated February 9, 2000) from TNRCC to CSSA regarding Quality Assurance Project Plan (QAPP) and analytical program letter, dated October 13, 1999 (Attachment 35).

On February 29, 2000 TNRCC San Antonio office received a copy of a letter (dated February 24, 2000) from CSSA to TNRCC regarding Tetrachloroethene Action Level Exceedance in an Offsite Well (Attachment 25).

On March 15, 2000 a ground water contamination meeting was held at the TNRCC San Antonio office. Copies of the meeting minutes and other materials are included as Attachment 26.

On May 9, 2000 TNRCC San Antonio office received a copy of a letter (dated May 8, 2000) from TNRCC to CSSA regarding RCRA Facility Investigation and Interim Measures Workplans, dated September 1, 1999 (Attachment 36).

On August 25, 2000 TNRCC San Antonio office received a copy of a letter (dated August 22, 2000) from TNRCC to CSSA regarding Calculation Procedures for Dioxins and Furans Wipe Sample Analysis (Attachment 37).

On October 9, 2000 TNRCC San Antonio office received a copy of CSSA Community Relations Plan Mail-Out Responsiveness Summary that was mailed out to almost 2,000 homeowners within approximately two miles of the base boundary (Attachment 38).

Attachment 39 is a copy of a letter from TNRCC to CSSA regarding the approval of 2<sup>nd</sup> and 3<sup>rd</sup> Quarter Groundwater Monitoring Reports by the TNRCC Corrective Action Section (Attachment 39).

Attachment 21 is a copy of a letter (dated June 15, 2001) from EPA Region 6 to CSSA regarding the use of Well 16 groundwater for the PIMS demonstration site at CSSA.

Attachment 27 is a copy of a letter (dated June 29, 2001) from Parsons Engineering Science, Inc. to CSSA regarding the potential impacts of monitoring well drilling near active offsite wells.

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Attachment 20 is a copy of a letter (dated July 17, 2001) from Parsons Engineering Science, Inc. to CSSA regarding the pumping tests at Wells 10 and 16.

Attachment 31 includes the CSSA Environmental Program Overview meeting presentation notes (dated July 19, 2001).

On July 30, 2001 the TNRCC San Antonio office received a letter (dated July 25, 2001) from CSSA to TNRCC San Antonio office regarding hazardous waste manifest corrections for the manifest completion violations cited during the July 11, 2001 CEI (Attachment 29).

On August 8, 2001 the TNRCC San Antonio office received a copy of a letter (dated August 3, 2001) from Why Wastewater?, Inc. to CSSA explaining the marked over date error on hazardous waste manifest number 02218245 (Attachment 30).

Attachment 40 includes Mr. Craig E. Meppen's field notes obtained during the July 11, 2001 CEI.

Attachment 41 includes the TNRCC Corrective Action Section Facility Log dated June 27, 2001.

#### Areas of Concern - 1999 CEI

1. The Washing Equipment of Texas (WET) brand washing system was installed to replace a tetrachloroethylene (PCE) and trichloroethylene (TCE) degreasing system in 1997. The old PCE/TCE degreaser had been operated over a sump since the 1950's. Conversations with Mr. Murphy indicated that the degreasing system most likely (possibly) consisted of a "hot tank". In addition, Mr. Murphy indicated that no testing to detect the presence of contamination from the operation of the unit had been performed prior to covering the sump, above which the unit had been located. Mr. Murphy further indicated that the unit had been kept clean and that no leaks or spills had been allowed to collect in the sump. Mr. Murphy also indicated that this area would be investigated if CSSA were ever closed. This sump was addressed as an Area of Concern in the 1997 CEI and is readdressed as an Area of Concern in the 1999 CEI. The concern stems from the fact that the chlorinated solvent degreasing system operated in the same location for over 40 years. The TNRCC San Antonio office recommended that the area surrounding the sump was assessed for possible soil and/or groundwater contamination.

*In the response letter from CSSA (dated June 17, 1999), it is stated: "CSSA continues to maintain that an assessment of the area surrounding the sump is not required at this time. As we have noted in previous correspondence with the TNRCC, the former degreaser unit which had been operated over the sump was kept clean and no known leaks or spills occurred. However, CSSA is subject to an EPA 3008(h) order which covers the entire*

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*facility. As part of this order, the facility is obligated to undertake a RCRA Facility Investigation to determine the nature and extent of releases of hazardous wastes or constituents from regulated units, solid waste management units and areas of concern. The area surrounding the sump may be included in the RCRA Facility Investigation if directed by EPA."*

*A sampling inspection was conducted on April 8, 2000 where the TNRCC San Antonio office investigator, Mr. Malcolm Ferris, split soil samples with CSSA. The sampling inspection was initiated by CSSA to evaluate possible chlorinated solvent contamination around the sump. Currently the concrete pit area in Building 90 that housed a metal vat that contained TCE and PCE is identified as a CSSA Area of Concern No. 65. Due to the fact that CSSA has recognized that the former housing of the pit needs to be evaluated for PCE and TCE contamination and appropriate remediation actions need to be taken, this area of concern is considered resolved.*

2. Inspection of the individual stockpiles in B-20 (SWMU No. 005) revealed that one of the stockpiles located on the northern portion of the SWMU contained an unusually large volume of lead debris (lead bullets, lead "clods") and that it had been exposed to the elements since the pile was generated (approximately 2 years). No protective measures such as covering with plastic, utilizing berms to prevent runoff/runoff, and/or containerization of the stockpile have been initiated. Removal of a solid waste from a SWMU is considered to be a waste generating activity. The excavated material is subject to hazardous waste determination and any subsequent regulations. To date no hazardous waste determination has been performed on the stockpile. Since the status of the stockpile was unknown (hazardous vs. non-hazardous) and since no action had been taken by CSSA with regards to management of this (and other stockpiles), a sample of the material was collected during the 1999 CEI. Review of the analytical results (for sample No. 003526-02) indicated that the northwest portion of the stockpile has a TCLP level for lead of 3,740 mg/L, which exceeds the Maximum Contaminant Level of 5.0 mg/L. The stockpiled material is considered a hazardous waste. In addition, the material has been stored on-site for over 90 days (since 1997). This issue would normally be addressed as a violation; however, a violation will not be cited at this time since the EPA 3008(h) Order was signed on May 5, 1999. Review of the 3008(h) Order revealed that it is an EPA issued Administrative Order on Consent against CSSA. The Order includes Findings of Fact and Conclusions of Law. In addition, the Order provides CSSA with the opportunity to apply to the EPA for the designation of a corrective action management unit (CAMU). The EPA Order did not specifically identify any SWMU as a CAMU. It is the TNRCC's understanding that B-20 would be designated as a CAMU. It should be noted that at the writing of this 1999 CEI, only the Order had been signed. No action pertaining to the Order has been carried out. CSSA will have to apply to the EPA for the designation of any CAMU. The decision to not cite a violation for storing hazardous



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waste for greater than 90 days is contingent upon CSSA complying with the Order, which includes the understanding that B-20 will be designated as a CAMU. The TNRCC San Antonio office requests a letter from CSSA detailing its request to the EPA for the designation of B-20 as a CAMU.

*June 17, 1999 CSSA response letter states: "It is still CSSA's contention that the soil at B-20 does not amount to the generation and/or storage of a hazardous waste because the soil is still in place, i.e., it remains within the boundaries of B-20. A hazardous waste determination will be made since it appears that the soil will exceed TCLP for lead. The soil has been covered, and CSSA is in the process of contracting with a permitted treatment, storage and disposal facility near Corpus Christi, Texas, for proper disposal of this soil."*

*Hazardous soils were shipped off site for disposal in July 1999 (see manifest in Attachment 12). Non-hazardous soil pile remains on site (Attachment 3, Photo 10). The non-hazardous soils have been treated by a phosphate induced metal stabilization (PIMS) process. Some of the treated soil is being used in a PIMS demonstration near the old Oxidation Pond Site. A 30 year rainfall event will be simulated, and the leachate will be tested to see if the PIMS process has indeed tied up the metals in the treated soil. At the time of the July 2001 CEI, no sites at CSSA have been designated as CAMUs. Since CSSA has indicated that all hazardous soils that were generated at this location have been shipped off site for disposal, this area of concern is considered to be resolved.*

3. CSSA is currently conducting remediation activities at 34 SWMUs located throughout the facility. A Work Plan and Sampling Analysis Plan for SWMU closure of these units was submitted on February 29, 1996. These plans separated the SWMUs into low, medium, and high priority status and proposed remedial activities for the individual sites. The following SWMUs were inspected during this CEI: F-14 Container Storage Area (SWMU No. 003), B-20 Open Burn/Open Detonation (SWMU No. 005), and the Oxidizing Pond, O-1 (SWMU No. 004) and are discussed earlier in this report. Conversations with Mr. Murphy indicated that CSSA plans to register each SWMU with the EPA as a corrective action management unit (CAMU) under the 3008(h) Order. On May 5, 1999, the 3008(h) Order was signed. It should be noted that at the writing of this CEI, only the Order had been signed. No action pertaining to the Order has been carried out. The Order provides CSSA with the opportunity to apply to the EPA for the designation of a corrective action management unit (CAMU). The EPA Order did not specifically identify any SWMU as a CAMU. It is the TNRCC's understanding that the SWMUs would be designated as CAMUs. The TNRCC San Antonio office requests a list of SWMUs that will be submitted to the EPA for the designation of a CAMU.

*June 17, 1999 response letter states: "CSSA has not made any decisions to date regarding*

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*the possible designation of any of the solid waste management units as CAMUs because CSSA is still in the early stages of its RCRA Facility Investigation. As TNRCC correctly noted, the facility just recently signed the EPA 3008(h) order on May 5, 1999. Interim measures are only planned at one site, O-1 (SWMU No. 004). All other sites are still at various stages of investigation. Should a site be considered for designation as CAMU, CSSA will make the proper application to EPA as required by their 3008(h) Order. CSSA will send a courtesy copy of any such applications to TNRCC. At this time, it is anticipated that the CAMU process will be SWMU specific. Our present intent is not to designate each SWMU as a CAMU, but to list SWMUs under a particular CAMU action. Most likely, CSSA will not request the designation of any SWMU as a CAMU until after the RCRA Facility Investigation is completed."*

*At the time of the July 2001 CEI, no sites at CSSA have been designated as CAMUs. Based on CSSA's response this area of concern is considered resolved.*

#### Summary of Resolved Alleged Violations - 2001 CEI

1. 30 Texas Administrative Code (TAC) §335.10(b)(1)&(2)/40 Code of Federal Regulations (CFR) 262.20(a) - Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste

(b) The manifest shall contain the following information:

(1) The manifest shall contain the generator's United States Environmental Protection Agency (EPA) 12-digit identification number and the unique five-digit number assigned to the manifest by the generator. This requirement does not apply if the waste being shipped is non-hazardous or if the generator is a conditionally exempt small quantity generator of hazardous waste.

(2) The manifest shall contain the total number of pages used to complete the manifest, plus the number of continuation sheets, if any (page 1 of \_\_\_\_\_)."

Review of hazardous waste manifests generated since the last inspection revealed that there were a few items missing from the documents. Hazardous waste manifests 01901206, 01901253, 01901252, 01901251, 01901250 are missing the manifest document numbers and page numbers (Attachment 12). Hazardous waste manifests 01901249 and 02218245 are missing manifest document numbers.

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*On July 30, 2001 the TNRCC San Antonio region office received a copy of two letters (dated July 25, 2001) from CSSA to Texas Ecologists notifying the disposal company of the corrections that needed to be made to the hazardous waste manifests listed above (Attachment 29). This violation is considered resolved.*

**Summary of Outstanding Unresolved Alleged Violations - 2001 CEI**

2. **30 TAC §335.10(a)(5)/40 CFR 262.20(d)(ref. 40 CFR 263.21(b)) - Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste**

"(a) Except as provided in subsection (g) and (h) of this section, no generator of hazardous or Class 1 waste consigned to an off-site solid waste process, storage, or disposal facility within the United States or primary exporters of hazardous waste consigned to a foreign country shall cause, suffer, allow, or permit the shipment of hazardous waste or Class 1 waste unless:

(5) a generator designates on the manifest one facility which is authorized to receive the waste described on the manifest. A generator may also designate one alternative facility which is authorized to receive the waste in the event an emergency prevents delivery of the waste to the primary designated facility. An alternate facility shall be identified on the manifest in the item marked "Special Handling Instructions and Additional Information." If the transporter is unable to deliver the waste to the designated facility or the alternate facility, the generator must either designate another facility or instruct the transporter to return the waste:"

Wastes shipped using manifest 02218245 were disposed of using alternate facilities without CSSA's approval (Attachment 30). CSSA did not take any steps to notify the transporter company (Why Wastewater?, Inc.) that the generator needs to approve the disposal company before their waste is submitted to a different disposal company not listed on the hazardous waste manifest. CSSA needs to notify the transporter of this violation and submit the documentation to the TNRCC San Antonio office.

3. **30 TAC §335.13(k)/40 CFR 262.42(a) - Record keeping and Reporting Procedures Applicable to Generators Shipping Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste**

"k) A registered/unregistered generator or primary exporter of hazardous waste subject to §335.76(c) of this title (relating to Additional Requirements Applicable to International

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Shipments) must submit an exception report to the executive director if he has not received a copy of the manifest with the handwritten signatures of the owner or operator of the designated facility within 45 days of the date that the waste was accepted by the initial transporter. The exception report must be retained by the registered/unregistered generator or primary exporter for at least three years from the date the waste was accepted by the initial transporter and must include:

(1) a legible copy of the manifest for which the generator does not have confirmation of delivery; and

(2) a copy of a letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste or Class 1 waste and the results of those efforts."

No exception report was submitted to the TNRCC Central Office to explain the delay in final disposal of wastes shipped using manifest 02218245. CSSA was required to submit to the TNRCC an exception report if a signed copy of the hazardous waste manifest document (by the disposal company) was not received by the facility within 45 days of the date the waste was accepted by the initial transporter. CSSA needs to complete an exception report for manifest 02218245 and submit the document to the TNRCC Central Office. A copy of the documentation also needs to be submitted to the TNRCC San Antonio office.

4. 30 TAC §335.4 - General Prohibitions / Texas Water Code 26.121

"In addition to the requirements of § 335.2 of this title (relating to Permit Required), no person may cause, suffer, allow, or permit the collection, handling, storage, processing, or disposal of industrial solid waste or municipal hazardous waste in such a manner so as to cause:

(1) the discharge or imminent threat of discharge of industrial solid waste or municipal hazardous waste into or adjacent to the waters in the state without obtaining specific authorization for such a discharge from the Texas Water Commission;

(2) the creation and maintenance of a nuisance; or

(3) the endangerment of the public health and welfare."

**The following discharges were documented during the inspection:**

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- A) Wheel abrator discharge located in front of building 90-2
- B) Wheel abrator discharge located on the side of building 90-2 facing building 90
- C) Mop water discharge located on the side of building 90 facing building 90-2
- D) Nickel penetrate discharge from the pipes that previously led to hazardous waste storage tanks that were located outside building 90-1

CSSA needs to evaluate the extent of the contamination caused by the above listed unauthorized discharges and remediate any contamination that might be present. The documentation relating to the delineation and remediation of the discharges needs to be submitted to the TNRCC San Antonio region office.

5. 30 TAC §335.6(c) - Notification Requirements.

“(c) Any person who generates hazardous waste in a quantity greater than the limits specified in §335.78 of this title (relating to Special Requirements for Hazardous Waste Generated by Conditionally Exempt Small Quantity Generators) in any calendar month or greater than 100 kilograms in any calendar month of industrial Class 1 waste shall notify the executive director of such activity using electronic notification software or paper forms provided by the executive director... Any person who provides notification pursuant to this subsection shall have the continuing obligation to immediately document any changes or additional information with respect to such notification and within 90 days of the occurrence of such change or of becoming aware of such additional information, provide notice to the executive director in writing or using electronic notification software provided by the executive director, of any such changes or additional information to that reported previously...The information submitted pursuant to the notification requirements of this subchapter and to the additional requirements of §335.503 of this title (relating to Waste Classification and Waste Coding Required) shall include, but is not limited to:

- (1) a description of the waste;
- (2) a description of the process generating the waste;
- (3) the composition of the waste;
- (4) a proper hazardous waste determination which includes the appropriate EPA hazardous waste number(s) described in 40 Code of Federal Regulations Part 261. Generators must

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determine whether such waste is hazardous as defined in 40 Code of Federal Regulations Part 261 and submit the results of that hazardous waste determination to the executive director;

(5) the disposition of each solid waste generated, if subject to the notification requirement of this subsection, including the following information:

(A) whether the waste is managed on-site and/or off-site;

(B) a description of the type and use of each on-site waste management facility unit;

(C) a listing of the wastes managed in each unit;

(D) whether each unit is permitted, or qualifies for an exemption, under §335.2 of this title (relating to Permit Required)..."

During the inspection a Solvent Recovery System was observed in Building 90-1. The system is a continuous feed recycling unit. Waste (solvent residues) generated by this system is classified as ignitable (D001) hazardous waste (waste code 4011609H). Conversations with Mr. Murphy indicated that this system has not been operational for several months and that a vendor comes out to CSSA to recycle any spent solvent in the interim. Review of the facility NOR revealed that the waste cleaning solvent (the liquid recycled) is not listed as a waste stream. A violation was cited for failing to list the waste cleaning solvent on the NOR, along with the waste management unit used to store the waste, and the disposition of the waste. The facility needs to add this waste stream to the NOR and submit documentation to the TNRCC San Antonio region office showing the correction of this violation.

6. 30 TAC §335.70 - Recordkeeping

(b) The generator shall keep a copy of each annual report and exception report required by this title for a period of at least three years from the due date of the report.

The facility was not able to provide a record of the 1998 annual waste summary at the time of the July 11, 2001 CEI. CSSA needs to obtain a copy of the filed summary and submit the documentation to the TNRCC San Antonio region office.

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7. 30 TAC §335.513(c)/40 CFR §262.40(c) - Documentation Required

"(c) The following documentation shall be maintained by the generator on-site immediately upon waste generation and for a minimum of five years after the waste is no longer generated or stored or until site closure:

(1) all information required under subsection (b) of this section;

(2) all analytical data and/or process knowledge allowed under §335.511 of this title (relating to Use of Process Knowledge) used to characterize hazardous, Class 1, Class 2, and Class 3 wastes, including quality control data."

During the inspection, CSSA did not provide hazardous waste determination documentation for contaminated groundwater and other wastes generated during investigation and remediation activities, including the soils generated during remediation at the Oxidation Pond (SWMU No. 004) site, soils generated during boring and well installation, and well development and purge water. The waste determination documentation needs to be submitted to the TNRCC San Antonio office.

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- A. CSSA needs to evaluate their NOR and confirm that all of the information is current. During the July 11, 2001 CEI several waste streams were not correctly described.
- B. CSSA needs to make sure that the activated charcoal from the groundwater treatment system is properly characterized (hazardous or non-hazardous) prior to disposal. In case the waste charcoal is found hazardous CSSA needs to assign a waste stream number and add the information to the NOR. The facility needs to evaluate their generator status with regards to the volume of hazardous waste generated once the charcoal is disposed of.
- C. The facility needs to submit a copy of the notification letter sent to the laundry service (providing the washing of the solvent contaminated rags) to the TNRCC San Antonio region office. Before the rags are washed the laundry facility needs to be notified what the contamination chemical is.
- D. During the July 11, 2001 CEI a roll-off container was observed with an incorrect label (Attachment 3, Photo 14). A hazardous waste label identified the generator as Kelly AFB. CSSA needs to make sure that all of the incorrect labelling is removed from containers prior to use.

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- E. Conversations with Mr. Murphy indicated that waste gasoline was disposed of from the Motor Pool area. CSSA needs to provide the TNRCC San Antonio region office with a copy of the hazardous waste manifest used for shipment of the waste gasoline for disposal.
- F. Conversations with Mr. Murphy indicated that wipe samples have been collected from Building 40 (SWMU No. 002). The facility needs to evaluate the possibility of collecting concrete chip samples to better evaluate the extent of contamination, if any. The documentation regarding any future sampling needs to be submitted to the TNRCC San Antonio region office.
- G. The TNRCC San Antonio region office is requesting CSSA to provide a summary listing the EPA 3008(h) order deliverables with the required submittal dates, along with the dates the deliverables were submitted to EPA and/or TNRCC. This type of summary will be useful to ensure that all deliverables are submitted as required by the EPA 3008(h) order.
- H. Mop water from building 90 needs to be disposed of down the sanitary sewer.
- I. The facility did state that a Source Reduction and Waste Minimization Plan was prepared for the CSSA installation, however it was not reviewed at the time of the CEI. The TNRCC is requesting a copy of the plan to be submitted to the San Antonio office.
- J. Well 16 pump test discharge issues are currently under TNRCC review and will be addressed in a later report. Additional violations and/or areas of concern may result from that review.
- K. CSSA did not provide hazardous waste handling training records for Mr. Brian Murphy. CSSA needs to submit the training records. Mr. Murphy needs to obtain hazardous waste training annually due to the position being held by Mr. Murphy at the installation.
- L. CSSA needs to submit a copy of the sample results for the split samples collected during the Sampling Inspection conducted on April 8, 2000 by Mr. Malcolm Ferris, TNRCC San Antonio office investigator.



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Conclusion

A Notice of Violation letter with violations and Areas of Concern has been sent to CSSA. The facility needs to submit the necessary documentation to correct the outstanding alleged violations. The San Antonio office will conduct appropriate record reviews or follow-up inspections.

Signed *Agnieszka M. Hobson*  
Agnieszka M. Hobson  
Environmental Investigator  
Region 13 / San Antonio

*08/28/01*  
Date

Approved *Henry Karnei, Jr.*  
Henry Karnei, Jr.  
Waste Section Manager  
Region 13 / San Antonio

*8/28/01*  
Date

Attachments: (in order of final report submittal)

- Data Entry Form/CMEL
- Enforcement Action Request (EAR)
- Letter to Facility: NOV
- Inspection Report
- Summary of Inspection Findings table
- CME Checklist
- LJC Self Reported Data Records Review
- Sample Analysis Results
- Manifests
- NGR

- Maps, Plans, Sketches
- Photographs
- Container Storage Area Table
- Tanks Table
- Correspondence from the facility
- Other (specify): see list of attachments
- Waste Minimization Checklist
- Multi-media Tracking Form
- IHW Change Form

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LIST OF ATTACHMENTS

- Attachment 1 Copy of the TRACS Industrial and Hazardous Waste Notice of Registration (NOR) for Camp Stanley Storage Activity (CSSA) - 12 pages
- Attachment 2 Copy of the EPA RCRAInfo Database dated June 25, 2001 - 2 pages
- Attachment 3 Photographs (16) documenting the Compliance Evaluation Inspection Conducted on July 11, 2001 at CSSA - 8 pages
- Attachment 4 Agnieszka Hobson's (TNRCC Environmental Investigator) field notes taken during and after the July 11, 2001 CEI at CSSA - 7 pages
- Attachment 5 CSSA Annual Waste Summary for year 2000 - 1 page
- Attachment 6 CSSA Waste Stream Analysis Summary - 32 pages
- Attachment 7 CSSA Monitoring Well Volatile Analytical Compounds Analytical Results - 1 page
- Attachment 8 Material Safety Data Sheet and formula preparation for Nickel Penetrant - 3 pages
- Attachment 9 Map illustrating areas of contamination throughout CSSA - 1 page
- Attachment 10 Map illustrating Satellite Accumulation Areas, Hazardous Materials Storage, and Spill Kits at CSSA - 1 page
- Attachment 11 Copy of a groundwater treatment facility permit for CSSA - 32 pages
- Attachment 12 Copies of CSSA Hazardous Waste Manifest documents - 28 pages
- Attachment 13 Copy of CSSA Emergency Notification Guide - 2 pages
- Attachment 14 Copy of CSSA Spill Prevention and Contingency Plan - 22 pages
- Attachment 15 Copy of CSSA Solid Waste Management Unit Status Table - 8 pages
- Attachment 16 Copy of the sign-in sheet for the July 11, 2001 CEI entrance interview at CSSA - 1 page

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- Attachment 17 Copy of the sign-in sheet for the July 11, 2001 CEI exit interview at CSSA - 1 page
- Attachment 18 TNRCC Customer Survey Signature Form - 1 page
- Attachment 19 Copy of CSSA employee training records - 47 pages
- Attachment 20 Copy of letter dated July 17, 2001 from Parsons Engineering Science, Inc. to CSSA regarding a pumping test at wells 10 and 16 - 4 pages
- Attachment 21 Copy of a letter dated June 15, 2001 from EPA Region 6 to CSSA regarding the use of well 16 groundwater for the PIMS demonstration site at CSSA - 1 page
- Attachment 22 Severn Trent Laboratories Analytical Results for samples collected during the April 8, 2000 Sampling Inspection conducted at CSSA - 104 pages
- Attachment 23 CSSA April 8, 2000 Sampling Results Table - 2 pages
- Attachment 24 CSSA April 8, 2000 Sampling Inspection Report - 11 pages
- Attachment 25 Copy of a letter (dated February 24, 2000) from CSSA notifying the TNRCC about Tetrachloroethene Action Level Exceedance in an offsite well and CSSA well 1 - 7 pages
- Attachment 26 Copy of meeting minutes and other materials from CSSA March 15, 2000 Ground Water Meeting - 22 pages
- Attachment 27 Copy of a letter (dated June 29, 2001) from Parsons Engineering Science, Inc. regarding "Potential Impacts of Monitoring Well Drilling near Active Offsite Wells" - 9 pages
- Attachment 28 CSSA Phytoremediation Treatability Study Report at SWMU B-20 - 57 pages
- Attachment 29 CSSA Hazardous Waste Manifest corrections for the violations noted during the July 11, 2001 CEI - 20 pages
- Attachment 30 Copy of a letter (dated August 3, 2001) from Why Wastewater?, Inc. to CSSA regarding the tracking of Hazardous Waste Manifest No. 02218245 - 5 pages

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- Attachment 31 CSSA Environmental Program Overview meeting presentation notes (July 19, 2001) - 29 pages
- Attachment 32 Copy of a letter (dated May 17, 1999) from CSSA to EPA Region VI regarding the appointment of a Project Manager in accordance with the provisions of the RCRA 3008(h) Administrative Order - 2 pages
- Attachment 33 Copy of a letter (dated July 19, 1999) from TNRCC to CSSA regarding the Investigation Report for Area of Concern 36 - 1 page
- Attachment 34 Copy of a letter (dated October 5, 1999) from TNRCC to CSSA regarding Items for TNRCC review and approval, dated July 12, 1999 - 1 page
- Attachment 35 Copy of a letter (dated February 9, 2000) from TNRCC to CSSA regarding Quality Assurance Project Plan (QAPP) and analytical program letter, dated October 13, 1999 - 1 page
- Attachment 36 Copy of a letter (dated May 8, 2000) regarding RCRA Facility Investigation and Interim Measures Workplans, dated September 1, 1999 - 1 page
- Attachment 37 Copy of a letter (dated August 22, 2000) regarding Calculation Procedures for Dioxins and Furans Wipe Sample Analysis - 1 page
- Attachment 38 Copy of a letter (dated October 6, 2000) from CSSA to the TNRCC regarding questionnaire postcards sent to almost 2,000 homeowners within approximately two miles of the base boundary - 7 pages
- Attachment 39 Copy of a letter (dated March 29, 2001) from TNRCC to CSSA regarding the 2<sup>nd</sup> and 3<sup>rd</sup> Quarter Groundwater Monitoring Reports - 1 page
- Attachment 40 Craig Meppen's (TNRCC Environmental Investigator) field notes taken during the July 11, 2001 CEI at CSSA - 2 pages
- Attachment 41 Copy of a letter (dated June 17, 1999) from CSSA to the TNRCC San Antonio office in response to the Notice of Violation/Areas of Concern letter (dated May 18, 1999) - 3 pages
- Attachment 42 Copy of the 2001 TNRCC Corrective Action Section Facility Closure Log - 1 page