

Inter Office Memorandum to File
Camp Stanley Storage Area
SWR 69026
July 29, 2003

PCLs. The staff indicated that justifications for consideration under RRS No. 1 has to be explained better. Because of this issue regarding background concentration levels, Parsons requested if COCs be examined on unit-specific basis rather than a facility-wide background level. The TCEQ staff indicated that Parsons need to evaluate and review the 3008(H) Order to determine if this is permitted.

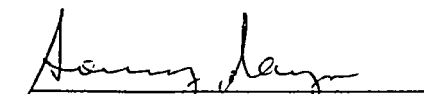
Regarding Data Quality Objective for verification of clean-closure, current practice at CSSA is to collect samples from the bottom and four excavation walls. In the approved Sampling and Analysis Plan, one sample is collected for every 100 linear feet. This sampling plan may not be suitable for smaller and larger units. The staff indicated that verification sampling may be conducted using unit-specific verification sampling plan and only if allowed by current 3008(H) Order.

With regard to TCEQ request for perchlorate tests, according to Mr. Brian Murphy, CSSA representative, there is one known incident of open burn/open detonation of rocket propellant at Camp Stanley. This was conducted at or near RFI B-20. Mr. Murphy indicated his preference to sample for perchlorates first on-site prior to proceeding to sample off-site. This is consistent with the preference of the EPA Project Manager Mr. Greg Lyssy. The TCEQ staff is concerned that if perchlorates is not found on-site, the testing for off-site contamination will not be pursued. The TCEQ staff has indicated TCEQ's preference is to sample off-site first. The rationale for this sampling are: (1) perchlorate is an anion and is not absorb in soil minerals and is highly mobile in aqueous systems, (2) there are two contaminated groundwater plumes that have migrated off-site from CSSA, and (3) there is a potential for human-health exposure from drinking contaminated groundwater. Because of these concerns, the staff recommended sampling for perchlorates at off-site drinking water wells first. However, since there are current on-site and off-site sampling programs, it would be best to conduct one-time sampling of on-site and off-site wells for perchlorate during these sampling events.

A discussion of Phosphate-Induced Metals Stabilization (PIMS) as a corrective measures technology for remediating metals in contaminated soil and groundwater was conducted by Mr. Ken Rice. This technology was successful in remediating lead (Pb) contamination at CSSA. The technology is also highly cost-effective. Parsons representatives requested if a presentation of this technology can be provided to the TCEQ Corrective Action staves. The TCEQ staff agreed; however, this has to be coursed thorough the TCEQ Vendor/Emerging Technology coordinator. A copy of the PIMS handout is provided as an attachment.

Copies of the reports entitled *Evaluation of Background Metals Concentration in Soils and Bedrock at CSSA Storage Activity Revised and Second Revision* were provided to the staff. In addition, the Department of Army Guidance for addressing potential perchlorate contamination was provided.

As indicated to the CSSA and Parsons representatives, the Region 13 Office will be made aware of the above-mentioned modification requests. Any decisions will have the approval and concurrence of Region 13 Office and TCEQ management in Austin.



Sonny Rayos

cc: Waste Program Manager, TCEQ Region 13 Office, San Antonio