ADDENDUM TO WORK PLAN CSSA SITE INVESTIGATIONS DO50 REMOVAL ACTION FOR SWMU B-15/16

Parsons is currently under contract to provide an investigation at former solid waste management unit (SWMU) B-15/16 at Camp Stanley Storage Activity (CSSA), Boerne, Texas. A Work Plan has been prepared for similar activities under the scope of work in effect for DY01 (Work Plan, Contract No. DACA87-02-D-0005, Task Order (TO) DY01, Parsons 2007). This work plan addendum provides description of additional activities to be conducted under Contract W912G-07-D-0028, delivery order (DO) 50 SWMU B-15/16. Activities to be conducted under DO50 will follow the provisions of prior work plans in effect and available for review in the CSSA Environmental Encyclopedia, Volume 1, Work Plans.

A Removal Action will be performed to remove impacted media and waste located at SWMU B-15/16 (Figure 1). The removal action will remove potential sources of contamination including metal debris and metals impacted soils. Background information on the site referenced can be found in Volume 3-1 of the CSSA Environmental Encyclopedia. Additional specific activities associated with this removal action are described in the Resource Conservation and Recovery Act (RCRA) Facility Investigations (RFI) Interim Measures Waste Management Plan (Parsons 2006).

DESCRIPTION

Field observations and soil sampling results from March 2000 (see <u>Volume 3-1</u> <u>SWMU B-15/16 RFI Report</u>) indicate the removal of approximately 4,500 cubic yards (CY) of impacted soil and metal debris is required at SWMU B-15/16. The remedial action will remove the soils impacted with copper above background levels. Metal debris will be segregated from the soil matrix through ground surface sifting and sent off post for recycling at an approved recycling facility. The remaining excavated impacted media will be characterized and transported for off-post disposal as non-hazardous contaminated media or transported to RMU-1 for use as berm maintenance material. The exact locations of excavation and removal will be field-determined, but are anticipated to remain within the perimeter of SWMU B-15/16 as shown in Figure 2.

REMOVAL ACTION PROCEDURES

The upper soil cover and debris-free overburden will be removed and stockpiled nearby for future use as fill or top soil. For the impacted media excavated, waste characterization sampling will occur at a frequency rate of 1 TCLP sample per 200 CY or 500 CY as determined by sampling of media/waste for metals and for total petroleum hydrocarbons (TX 1005). All waste media, Non-hazardous, will be managed off-post at an approved landfill or transported to RMU-1. No ordnance material is expected to be encountered; however, it is anticipated that an unexploded ordnance (UXO) supervisor and technician will be present during excavation and ground surface sifting efforts for UXO avoidance.

The site's contaminated soils will be managed in accordance with CSSA's RFI Interim Measures Waste Management Plan (Parsons 2006) and the RFI/IM Addendum for SWMU B-15/16 (Parsons 2010). Impacted soil media from SWMU B-15/16 is expected to meet Class 2 non-hazardous criteria for off-post disposal at Covel Gardens Landfill in San Antonio, Texas or transported to CSSA's east pasture range berm, as necessary. Metal debris that is deemed recyclable will be segregated into a scrap stockpile. Suspected hazardous or unknown materials will be segregated into separate stockpiles. It is anticipated that as much as 4,500 CY of excavated materials will require some form of management.

All removal work will be performed in Level D personal protective equipment. The excavated material will be handled and disposed as determined by waste characterization testing. Sampling methodology and quality control are described in the SAP addenda (*Sampling and Analysis Plan Addendum, DO50*, Parsons February 2010).

CONFIRMATION SAMPLING

In addition to the waste characterization sampling, data are required to confirm that the lateral and vertical extent of contamination has been delineated and removed. The vertical extent of potential contamination will be assessed by sampling the soil-rock interface at the site. Samples will be collected and analyzed for VOCs, SVOCs, explosives, and CSSA 9 metals. The sample locations and the sample collection intervals will be determined after the extent of the excavation has been defined. Upon completion of the field surveys and data collection, Parsons will prepare a RIR to document the condition of the site, and submit the report to the TCEQ.



