



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

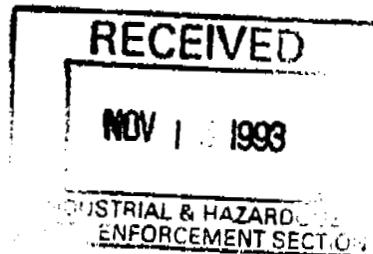
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED P 323 409

Captain Robert A. Bender, Commander
Camp Stanley Storage Activity, RRAD
Department of the Army
Post Office Box 69027
San Antonio, Texas 78269-0627



Re: Comments Regarding Partial Facility Closure Plan for the B-20 Detonation Area, Camp Stanley Storage Activity, San Antonio, Texas, Docket Number RCRA-V-310-H, EPA I.D. Number TX2210020739

Dear Captain Bender:

We appreciate your submittal of the Partial Facility Closure Plan, herein referred to as the Closure Plan, for the B-20 Detonation Area at Camp Stanley Storage Activity. However, the Plan as submitted is inadequate. Consequently, the Environmental Protection Agency (EPA) can not recommend approval of the Closure Plan to the Texas Natural Resources Conservation Commission (TNRCC). Furthermore, the EPA feels that certain areas of concern pertaining to the contents of this Closure Plan require further address.

This unit is regulated under *40 CFR 265 Subpart P - Thermal Treatment*. Therefore, the Closure requirements pertaining to this unit are regulated under *40 CFR Part 265 Subpart G, 265.112* and *31 TAC Chapter 335*. Further we understand you intend to close this unit in accordance with *31 TAC Chapter 335; Subchapter S*, therefore, this Closure Plan was reviewed from the view point of characterizing the unit and determining what additional information and methods should be addressed prior to closure. Therefore, Camp Stanley must address the following concerns:

In Table 1, on Page 4 within your plan, as stated in *40 CFR § Part 265.112 (b)(3)* an estimate of the maximum inventory of hazardous waste ever on site over the active life of this unit must be included in the Closure Plan. Table 1 within your plan should be inclusive of all compounds burned or detonated at this unit. The inventory should attempt to estimate the quantities of the various hazardous wastes that were burned or detonated within this unit. Furthermore, any hazardous waste constituents in the form of waste residuals or derivatives associated with these source compounds must be determined and sampled for accordingly.



Because of the areal extent (27.5 acres) comprising this unit, the approximate locations of where various activities were conducted within this unit should be documented as best as possible and assimilated to the best of your ability to aid in proper sample location determinations. Also, as you noted, accordance with SW-846 will require gridding the unit to spatially orient the sampling. Within this endeavor should be included any impacted runoff channels and receiving surface waterbodies as well as focus on more recent detonation craters to assist Camp Stanley in determining the hazardous waste constituents, residuals, and derivatives, that are most likely associated with this unit. For instance, in the case of the runoff, it appears from our visual observations that all surface runoff and seepage from shallow soils from the B-20 Unit are channelled and collected in the nearby pond east of the unit. It would be recommended that surface water and sludge from this pond should be analyzed for target compounds associated with B-20. Furthermore, Camp Stanley should determine if any additional runoff channels exist and where they would impact, if found to exist.

As stated in *40 CFR Part 265.111(b)* "the owner or operator must close the facility in a manner that controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere." Table 1 listed the hazardous waste associated with the site but must also address the specific hazardous constituents, contaminated runoff, or hazardous waste decomposition products associated with the activities performed at these types of units historically at Camp Stanley, to the best of your ability.

A comprehensive listing of all parameters that meet the previously listed definitions (i.e., hazardous waste decomposition products) should be developed for inclusion into the sampling strategy of this unit. The EPA considers an extensive determination of the presence of these parameters to be paramount toward determining proper closure criteria.

On Page 5 of your closure Plan, as stated in *40 CFR § Part 265.112 (b) (6)*, a schedule for the intervening closure activities detailed within the Partial Closure Plan should be included. This schedule should explain in detail all activities associated with all closure activities.

Under the heading "Remedial Investigation of Unit", the Partial Closure Plan states that investigation of the unit will be conducted "as safe or necessary, within the B-20 area to determine both the lateral and vertical extent of contamination." This statement appears to lack a definitive approach to determining what methods will be employed to circumvent the hazards and technical challenges associated with sampling B-20. The address of this specific problem must be conducted prior to generating any further project plans. EPA appreciates the possible hazards involved with the sampling of units of this nature, but must maintain that more specific criteria regarding the following requirements, be submitted: methodology of sampling; statistical approach; analyses of concern; sampling objectives; data quality objectives; sampling strategy; QA/QC; and, data analysis and reduction.

We suggest for guidance that you refer to the Corrective Action Plan Outline from the model Corrective Action Plan Outline, as delivered to you in September in Dallas at our initial meeting.

In conclusion, the Partial Closure Plan revision should include a detailed inventory of all compounds and their associated residuals and derivatives burned or detonated at the B-20 Detonation Area. Furthermore, the Plan should target specific areas of known detonation for initial sampling to help direct complete sampling. The sampling strategy should include any surface runoff, vertical migration routes, and exposed groundwater aquifers. A strategy to address the site specific safety problems associated with sampling B-20 needs to be addressed. All impacted areas of concern should be delineated and illustrated for clarification to determine specific sampling activities. Finally, the closure strategy, whether clean closure, closure in place, closure in place after partial remediation, or closure under TNRCC's Subchapter S should be determined. This strategy determination will allow both Agencies to assist you in your closure of B-20. Please address these comments, revise your Closure Plan, and submit your revisions to both Agencies within 30 days.

If you require further comment upon these recommendations please contact me at (214) 655-6794, or have a member of your staff contact Matt Andrus at (214) 655-2248. We appreciate your attention to these matters and look forward to participation in further progress at your facility.

Sincerely yours,

Bobby D. Williams

for
Guy L. Tidmore, P.G., Chief
Texas Section (6H-CT)

cc: Wendy Rozacky, Acting Manager
Industrial and Hazardous Waste Enforcement Section
Texas Natural Resources Conservation Commission