



#1277
69026

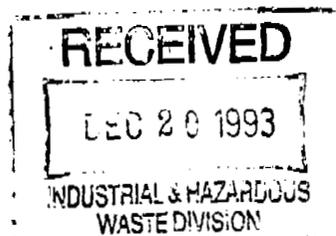
DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, RRAD
POST OFFICE BOX 69027, SAN ANTONIO, TEXAS 78269 - 0627

December 13, 1993

Office of the Commander

SUBJECT: Camp Stanley Storage Activity, RRAD, EPA Identification Number TX2210020739, Texas Registration Number 69026, 90 Day Notification of Closure Actions for the Inactive F-14, Less Than 90 Day, Storage Area

Mr. Anthony Grigsby, Executive Director
Texas Natural Resource Conservation Commission
P.O. Box 13807
Capitol Station
Austin, Texas 78711-3087



Dear Mr. Grigsby:

Camp Stanley Storage Activity (CSSA) intends to close a less than 90 day storage area identified as the CSSA F-14 accumulation point. This letter constitutes 90 day notification to Texas Natural Resource Conservation Commission (TNRCC) of intended closure activities pursuant to 31 TAC 335.6(g). By copy of this letter, notification is also provided to TNRCC Region 13. The risk reduction standard to be attained under 31 TAC 335, Subchapter S, is Standard 1.

Engineering-Science (ES) performed an August 1992 site assessment for CSSA. Concentrations of 13 to 67 milligrams per kilogram (mg/kg) total petroleum hydrocarbons (TPH) and nondetect to 12 mg/kg nickel were detected in subsurface rock samples to 20 feet below ground level (BGL). No groundwater was detected, and the first groundwater is approximately 140 feet BGL. One soil/rock sample collected from the site berm contained 30 mg/kg TPH, 0.486 mg/kg 1,1,1-trichloroethane (TCA), 0.11 mg/kg butyl benzyl phthalate, and 2.8 mg/kg nickel.

The TPH concentrations are indicator parameters rather than contaminants (31 TAC 335.553(d)). Butyl benzyl phthalate was also detected in only one sample at low concentrations attributable to laboratory contamination. Therefore, to attain Standard 1, all wastes and waste residues shall be removed or remediated to constituent background levels or to nondetect for 1,1,1-TCA. Background levels are not known at this site or elsewhere at CSSA.

Based on the site assessment results, CSSA will pursue risk reduction Standard 1 by the following means:

a. Remove or remediate 1,1,1-TCA in the berm:

Resample the berm in previous composite locations to determine the area(s) that contain 1,1,1-TCA, remove that portion(s) of soil, verify by sampling and analysis that the solvent wastes have been removed, and transport the to-be-determined amount of soil to a Class 1 nonhazardous facility.

b. Collect background samples to confirm subsurface nickel levels:

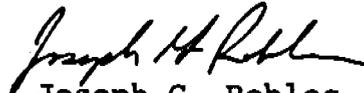
Sample a minimum data set of 10 unaffected background areas at CSSA and test for background metal levels. This background set of data shall then be used for comparison purposes. If nickel concentrations previously detected in the subsurface are at or below background, then no remediation of the site will be necessary. If nickel concentrations are above background, then those affected areas will be excavated and the soil/rock transported to a facility selected on the basis of the actual nickel concentrations. Completion of such remediation will be verified by sampling and analysis, and the remediated areas filled in with clean soil.

c. Closure actions will be conducted under the supervision of a state-registered professional engineer (P.E.) and certified for closure when the work meets P.E. approval. A closure report shall be submitted detailing the closure actions within 60 days of completion of closure activities.

Pursuant to 31 TAC 335.8(c), CSSA shall notify TNRCC in writing, at least 10 days prior to activities, of the facility/site name, the standard for closure, and the estimated time to complete the closure under Standard 1 (31 TAC 335.8(c)). Closure activities will commence 90 days from date of this notification letter. It is estimated that closure activities will be completed within 120 days of project initiation, and certification provided to the TNRCC within 180 days of initiation. CSSA will notify TNRCC Regional Office 10 days in advance of any sampling activities.

Should you have any comments or questions, please call Mr. Paul B. Oliver at (210) 221-7473 or Ms. Susan Roberts at (512) 467-6200.

Sincerely,



Joseph G. Robles
Lieutenant Colonel, U.S. Army
Commanding Officer

Copies Furnished:

Mr. Richard Garcia, TNRCC Region 13
LTC Montgomery, AL/OEB
Ms. Susan Roberts, E-S