

SWR 69026

John Hall, *Chairman*  
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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

June 28, 1994

Lt. Colonel Joseph G. Robles  
Department of the Army  
Camp Stanley Storage Activity, RRAD  
Post Office Box 69027  
San Antonio, Texas 78269-0627

RE: Camp Stanley Storage Activity, SWR No.69026, EPA ID No. TX2210020739, Partial Facility Closure Plan for B-20 Detonation Area, Volume I: Appendices A-C.

### INTERIM APPROVAL WITH MODIFICATIONS

Dear Colonel Robles:

The Texas Natural Resource Conservation Commission (TNRCC), Corrective Action Staff, has completed review of the Closure Plan submitted for the B-20 Detonation Area. The site is an open burning/open detonation area located at the Camp Stanley Storage Activity (CSSA), Texas.

A Closure Plan was initially submitted to the TNRCC by CSSA in correspondence dated August 5, 1993. The Closure Plan was generated in response to a Compliance Order issued to CSSA by the United States Environmental Protection Agency (EPA), and dated June 1993.

EPA issued an opinion of the Closure Plan on November 8, 1993 in which the EPA identified a number of deficiencies. No written response to the original closure report was generated by the TNRCC. The referenced Volume I Closure Plan that was reviewed for this letter is an addendum to the original closure plan and is intended to address the deficiencies identified in the EPA opinion as well as concerns of the TNRCC.

The plan appears to be substantially consistent with the requirements of the Enforcement Order issued by the EPA and dated October 15, 1993 and state solid waste closure requirements of 30 Texas Administrative Code §335.8 (b). This letter constitutes interim approval, by the Executive Director, of the closure plan for site S-20, subject to the enclosed modifications and required public notification:

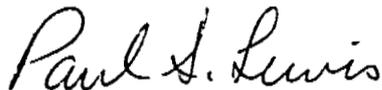
1. Section 3.2 Closure Performance Standard includes a list of required documents and actions necessary to close the unit under TNRCC risk reduction standard 3. Site B-20 is a RCRA regulated unit and so all RCRA interim status closure procedures must also be followed;

Camp Stanley  
CP Site B-20  
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5. APPENDIX C Section 3.6 HANDLING OF INVESTIGATION-DERIVED WASTES states that drill cuttings will be spread out at the drill sites. Drill cuttings must be containerized and characterized for proper disposal and handling procedures. In areas where there is no suspected contamination such as the borings that are proposed for background soil collection the cuttings may be spread out on the ground.

If you have any questions or require further information concerning this matter please contact Mr. Cecil Irby of my staff at (512) 239-2365.

Sincerely,



Paul Lewis, Manager  
Corrective Action Section  
Industrial and Hazardous Waste Division

PL:ci/jo

enclosures

cc: Lonnie Wright, Red River Army Depot  
Bill Hurlbut, EPA Region 6, Dallas  
Guy Tidmore, EPA Region 6, Dallas  
Connie Wong, TNRCC I. & H. W. Enforcement Section  
Bill Brown, TNRCC Region 13 Office, San Antonio  
Richard Clarke, Corrective Action Closure Team  
Tennie Larson, Corrective Action (CL360)

Notice of {Final/Partial} Facility Closure

Pursuant to 30 Texas Administrative Code (TAC) Section 335.118(b), the Executive Director of the Texas Natural Resource Conservation Commission hereby gives notice of the closure plan received on {\_\_\_\_\_, 19{ for the hazardous waste unit operated by {Plant Name}. The facility is located at {site address} Texas. Pursuant to the closure plan submitted, {Plant Name/Location} intends to close {\_\_\_\_\_} by {\_\_\_\_\_}.

The purpose of this notice is to give members of the public the opportunity to submit written comments on the closure plan and request modifications to the plan. Any comments must be submitted within 30 days of the date of publication of this notice to Paul S. Lewis, Manager, Corrective Action Section, Industrial and Hazardous Waste Division, Texas Natural Resource Conservation Commission, P.O. Box 13087, Austin, TX 78711-3087. Pursuant to 30 TAC Section 335.118(b), the Executive Director is required to approve, modify, or disapprove the plan within 90 days of receipt. Copies of the closure plan are open for public inspection at the north Austin office of the Texas Natural Resource Conservation Commission, Park 35, Building D, Room 190N, 12118 North IH-35, Austin, Texas and at the Commission's Region {\_ Office, {site address}.

In addition, pursuant to 30 TAC Section 335.118(b), the Executive Director may, in response to a request or at his own discretion, hold a public hearing on the closure plan whenever such a hearing might clarify one or more issues concerning the plan. Any request for a public hearing should be submitted within 30 days of the date of publication of this notice to Paul S. Lewis, Manager, Corrective Action Section, Texas Natural Resource Conservation Commission, P. O. Box 13087, Austin, Texas 78711-3087, telephone 512/239-2343.

Issued in Austin, Texas on \_\_\_\_\_

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Paul S. Lewis, Manager  
Corrective Action Section  
Industrial and Hazardous Waste Division