

WR 69026



DEPARTMENT OF THE ARMY  
CAMP STANLEY STORAGE ACTIVITY, RRAD  
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Office of the Commander

Paul Lewis  
Manager  
Correction Action Section  
Industrial and Hazardous Waste Division  
Texas Natural Resource Conservation  
Commission (TNRCC)  
P.O. Box 13807, Capitol Station  
Austin, Texas 78711-3087

Dear Mr. Lewis:

Reference your letter of interim approval with modifications dated June 28, 1994, Subject: 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.

In response to comments and modifications noted in referenced letter, Engineering-Science, Inc. (ES) has prepared a statement to clarify actions requested in the TNRCC interim approval, which includes by reference the U.S. Environmental Protection Agency (EPA) Region VI, RCRA Enforcement.

During a phone conversation on 9 August 1994 between Cecil Irby of the TNRCC Federal Facilities Corrective Action Staff and Susan Roberts of ES, Cecil Irby noted that TNRCC considers the March 1994 closure plan for the B-20 detonation area "a notification of closure." The TNRCC will consider final approval of a "closure plan" for the B-20 area when a corrective action plan for any hazardous wastes or waste residues is decided through evaluation of remedial investigation results, a baseline risk assessment, and a corrective measures study. The corrective action is to be approved by EPA Region VI and TNRCC and will be added to the current closure plan as an amendment. Therefore at this time, the referenced closure plan will not be renamed, but for clarification of interested parties it will be considered "a notification of closure" for the B-20 detonation area. Furthermore, the 180-day period for closure will begin upon final approval by TNRCC of the amended closure plan with a specified closure action.

The following responses are listed in the order given in referenced TNRCC June 28, 1994 interim approval letter:

a. Comment 1.

In addition to TNRCC risk reduction rules, all RCRA interim status closure procedures will be followed during closure of the B-20 detonation area.

b. Comment 2.

CSSA will obtain TNRCC approval prior to implementation of risk reduction standard 3. If results from the remedial investigation (the investigation is detailed in section 4 of the March 1994 closure plan) indicate that TNRCC risk reduction standard 2 is applicable as a closure standard to the B-20 detonation area, then an amendment to the March 1994 partial facility B-20 closure plan will be submitted to TNRCC and EPA Region VI RCRA Enforcement. TNRCC does not require a closure plan under standard 2, but RCRA regulations require an amended closure plan.

c. Comment 3.

TNRCC requested that CSSA submit a proposal "for establishing naturally occurring concentrations of inorganic constituents (metals) in soil and groundwater" at the B-20 site. During the 9 August 1994 phone conversation between Cecil Irby, TNRCC, and Susan Roberts, ES, various statistical approaches for the B-20 area were discussed. The TNRCC interim approval letter indicated that the Tolerance Interval Method for determination of background metal levels is preferred, but other methods are acceptable if justified. In addition, the Tolerance Interval Method, which utilizes 15 to 20 background samples per population, is preferred by TNRCC at complete facility closures. As the B-20 detonation area is a partial facility closure, TNRCC has indicated that the student t-test, set forth as part of the TNRCC risk reduction rules, may be acceptable for the determination of background metal levels at the B-20 area.

The TNRCC interim approval letter indicated that CSSA should address both soils and groundwater. As discussed in the B-20 closure plan, groundwater is not anticipated within the proposed depths of drilling (up to 30 feet below ground surface) of the remedial investigation. These depths were proposed as

most likely where potential hazardous wastes or waste residues might be detected (section 4 of the March 1994 B-20 closure plan). Investigation of groundwater is therefore not part of the remedial investigation unless groundwater is detected during drilling. Therefore no background samples for metals in groundwater will be collected unless groundwater is detected at the B-20 area. If groundwater is detected, a second phase of remedial investigation addressing groundwater assessment, monitoring well installation, and collection of site-specific and background groundwater samples will be proposed to TNRCC and EPA Region VI RCRA Enforcement.

We propose to use the following statistical procedures to determine background metal levels at the B-20 detonation area:

- Use of the student t-test as promulgated in 30 TAC 335.553(d)(2). This statistical method requires a minimum of 10 samples per sample population, calculation of the mean, standard deviation, and use of t-values based on the number of samples in each data set. The results are statistically compared within a 95% confidence level.

- Collection and analysis of metals for four sample populations. Three U.S. Soil Conservation Survey soil types are known at B-20 (section 2.2 of the March 1994 B-20 closure plan), and one rock strata, the Glen Rose Formation, underlies these soil types to the depth of drilling proposed for the remedial investigation (section 4 of the closure plan). Thus, the four sample populations for background metals are three soil types and one rock strata.

- A minimum of 10 background samples per sample population will be collected from appropriate background locations at CSSA. Some background samples have already been collected, and the resulting data may be used for the B-20 site.

- During April 1994, ten background rock samples and one to three background soil samples of eight soil types found at CSSA were collected. Ten background locations for soil and rock samples were selected by CSSA based on 1) lack of any known waste management activities in the selected areas, and 2) accessible locations of the eight different soil types. One background soil sample and one background rock sample within the Glen Rose Formation were collected at each of ten locations. These samples were analyzed for metals and validated as Level 3 data

deliverables for use in closure of waste management units at CSSA.

- Inclusion of the above validated data in the appropriate background sample populations for determination of background metal levels in three soil types and one rock strata at the B-20- site.

d. Comment 4.

As required by 40 CFR 265.112(d)(4), a public notification of the closure plan must be made by CSSA prior to final approval of the closure plan by EPA Region VI and TNRCC. As discussed above, the B-20 closure plan is currently at the "notification of closure" stage. When a final corrective action is submitted as an amendment to the March 1994 closure plan (after submittal of the remedial investigation report, baseline risk assessment, and corrective measures study), TNRCC will consider approval of the final closure plan. CSSA will at this time provide a public notification to a local newspaper and submit the Publisher's Affidavit to EPA Region VI and TNRCC.

e. Comment 5.

Drill cuttings generated during the remedial investigation will be containerized in drums or roll-offs, depending on the amount of soil and rock generated. These cuttings will be characterized for appropriate disposal with analytical tests appropriate to any hazardous waste constituents found during the remedial investigation or other onsite closure actions. Cuttings generated during collection of background samples, where there is no suspicion of contamination, will be spread in the area of the borehole. Other wastes will be handled as specified in Appendix C of the B-20 closure plan.

This statement is made to clarify how the modifications noted by TNRCC in comments 1 through 5 of the interim approval will be carried out during closure actions for the CSSA B-20 detonation area. If TNRCC or EPA Region VI RCRA Enforcement wish to modify this understanding, CSSA requests that an agency response be made within 30 days of receipt of this statement. If no response is made within that time frame, CSSA intends to initiate the remedial investigation as discussed in the March 1994 partial facility closure plan for the B-20 detonation area.

Should you have any questions regarding the B-20 closure or this statement, please contact Mr. Brian Murphy, Environmental Officer at (210) 221-7453.

Sincerely,



Dean C. Schmelling  
Lieutenant Colonel, U.S. Army  
Commanding Officer

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