

**PLAN OF ACTIONS FOR THE B-20 SITE
CAMP STANLEY STORAGE ACTIVITY, TEXAS**

OCTOBER 26, 1995

Introduction

The B-20 site at Camp Stanley Storage Activity (CSSA), Texas, is a former open burn/open detonation area used prior to 1987 for demolition of munitions. The site is currently undergoing closure activities. The Texas Natural Resource Conservation Commission (TNRCC) identification number for CSSA is 69026; the Environmental Protection Agency identification number is TX2210020739. Project work is performed for CSSA by Parsons Engineering Science (Parsons ES) under Armstrong Laboratory/OEB contract F33615-89-D-4003, order 126.

Background

The B-20 site at Camp Stanley Storage Activity (CSSA), Texas, is undergoing investigation in preparation for site closure under state and federal regulations. The investigation and closure of the site are part of an EPA Region VI RCRA Enforcement compliance order of 30 June 1993. Investigation work was performed in 1994 in accordance with the interim closure plan reviewed by EPA and TNRCC, and reported in the "Final Remedial Investigation Report for B-20 Former Open Burn/Open Detonation Area" (Parsons Engineering Science, June 1995). Investigation results included the following:

1. Unexploded ordnance (UXO) may exist on and around the site. The majority of UXO found was 20 mm projectiles.
2. Surface soil samples contained metal concentrations that exceeded TNRCC risk reduction standard (RRS) 1 for cadmium, lead, mercury, and barium. Only lead levels at small ammunition disposal areas exceeded RRS 2.
3. Subsurface soil samples contained arsenic and mercury above RRS 2.
4. Groundwater did not contain VOCs or metals.
5. Surface water samples contained lead and cadmium above RRS 2 levels. Sediment samples contained metals above background, but not above RRS 2 levels.

Item 2 results (e.g., the amount of surface soil that might require remediation) were dependent on a statistical sampling interval of 250 x 250 feet. To better delineate the extent of surface soil levels that exceeded RRS 2, an amendment to the B-20 work plan for additional sampling was prepared, and the sampling took place in September 1995. Results indicated no significant difference in the area of metals in surface soils.

The B-20 project status was reviewed for TNRCC and EPA personnel during a meeting at CSSA on October 19-20, 1995. CSSA personnel were Lt Col Dean Schmelling, CSSA Commander, Rod Chatham, Director of Special Projects, Brian Murphy, Environmental Officer, Tom Tutweiler, Deputy Director of Special Projects, and Paul Oliver, Chief of Security. Guy Tidmore, Chief, Texas Section of EPA Region VI RCRA Enforcement attended. TNRCC personnel were Richard Clarke, Closure Team Program Manager, Corrective Action Section of TNRCC Industrial and Hazardous (I&H) Waste Division, Luis Campos of the I&H Waste Division, and Malcolm Ferris of the District 13 field office. The technical presentation was given by Susan Roberts, Parsons

ES Project Manager. The Armstrong Laboratory project manager, Lt Col James Montgomery, was not able to attend the meeting due to schedule constraints.

After a technical presentation of the investigation work to date and results, the following actions were agreed upon by the meeting attendees as appropriate and relevant to B-20 site closure. No timetables were established at this meeting.

Action 1. Information Requests. Action to be performed by Parsons ES as specified per item.

- TNRCC action: CSSA will request information from TNRCC on "point of generation" for UXO demolition at adjoining Camp Bullis. Would such demolition as part of emergency response actions be placed on CSSA or Camp Bullis/Fort Sam Houston waste disposal NORs?
- TNRCC action: CSSA will request copy of letter from Malcolm Ferris, TNRCC District 13, regarding UXO disposal guidance from TNRCC to DoD.
- Parsons ES action: Parsons ES will request information from EPA and DoD with regard to DoD having authority under CERCLA to perform emergency actions such as UXO disposal. The responses will be sent to CSSA.

Action 2. Comparison of Risk Reduction Standards with Analytical Results

- Parsons ES action: During preparation of the addendum report of additional sampling regarding September 1995 sampling, Parsons ES will clarify the comparison of B-20 SPLP analytical results with the appropriate maximum concentration levels (MCLs).

Action-3. Closure Plan Modification

Parsons ES action: Parsons ES will modify the B-20 closure plan for CSSA regarding the following points. *Note: the modification will be an amendment to the existing closure plan of March 1994.*

- Parsons ES shall include in the plan destruction of the non-movable antipersonnel bomblet at B-20 by blow-in-place (BIP). BIP shall be performed by Army 137th Explosive Ordnance Detachment (EOD) as an Emergency Response action.
- Parsons ES shall include in the plan contingency actions or future BIPs, as may be necessary for final destruction of all UXO found at and around B-20. The contingency actions will be listed for easy identification of all actions and clearances necessary to be performed prior to each BIP. It is anticipated such contingency actions will be performed by the UXO subcontractor or by the Army 137th EOD.
- Parsons ES will describe vegetation (grass and scrub trees) clearing and controlled burns at and around the perimeter of B-20 to remove vegetation for final UXO sweep and identification. It is anticipated that these actions will be performed by the UXO subcontractor.
- Parsons ES shall include in the plan removal of contaminated media (surface soil, and sediments to address surface water contamination in craters) to meet closure RRS 1 or 2, a standard which will be selected by CSSA based on effectiveness of remedial actions to clean up B-20 to background (RRS 1) versus RRS 2 levels, and the costs associated with those actions. Also, the issue of whether scrap metal may be left at the site will be addressed after selection of closure standard by CSSA.
- Parsons ES shall include in the plan a description of anticipated verification sampling and analysis to be performed by Parsons ES after implementation of remedial actions.
- Parsons ES shall include in the plan a description of anticipated, certification of closure that will be based on results of verification sampling and analysis. The certification will be a format for submittal to TNRCC and EPA.

- Parsons ES shall include in the plan removal of macro scrap metal that conceivably may be picked up by magnets, versus removal of scrap metal that may exist at the soil particulate size.
- Parsons ES shall include in the plan use of the highest background level per metal of risk reduction standard 1 comparisons (rather than cleanup to 3 different background levels in soils that exist side by side at the site).

Action 4. Public notification for B-20 closure.

After approval of the final closure plan by EPA and TNRCC, CSSA will provide public notification of the B-20 closure through newspaper notice.