

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution.

July 23, 1996

LtCol. Schnelling, Commander
Camp Stanley Storage Activity (CSSA)
25800 Ralph Fair Road
Boerne, Texas 78015

Attn: Brian Murphy, CSSA Environmental Officer

Re: Camp Stanley Storage Activity (CSSA), Boerne, Texas
TNRCC Solid Waste Registration No. 69026
Background Metals Concentration at CSSA

Dear Sir:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed your report, dated June 1996, regarding background metals at CSSA. The established background concentrations for the metals will be used as comparison criteria for ongoing and future SWMU closures at CSSA.

According to the report, nine metals were chosen for background data for the SWMU closures based on known waste disposal records and process knowledge. Background was established for each metal for a particular soil type (eight soil types) at CSSA. The report mentions that the highest calculated background concentration for the soil types will be used at each SWMU. According to table 4.3 (calculated background metal levels), the Brackett soils show a 196 mg/kg background level for Lead, 73 mg/kg for Chromium, and 37.7 mg/kg for Arsenic. The background concentrations for these metals in the Brackett soils appear to be high if used as a target background concentration when two or more soils exist with lower background concentrations in an individual SWMU.

The TNRCC met with EPA, and CSSA and their representatives on July 16, 1996 to discuss the background concentrations at CSSA. The map (figure 3.1 in the report) indicates that the Brackett soils are not associated with most of the SWMU's at CSSA except for three SWMU's (B-26, B-9, & B-33) which appear to exist solely in the Brackett soils. Since these SWMU's