



DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, RRAD
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

27 January 2005

U-215-05

Texas Commission on Environmental Quality
Water Quality Applications Team
Registration, Review, and Reporting Div.
Attn: Ms. Kellie Crouch-Elliott
PO Box 13088 (MC-161)
Austin, TX 78711-3088

Subject: Response to Texas Commission on Environmental Quality
(TCEQ) Texas Pollution Discharge Elimination System (TPDES)
Permit Renewal/Amendment Application Notice of Deficiency
Letter, TPDES Permit No. WQ0003849-000, Camp Stanley
Storage Activity, Boerne, Texas

Dear Ms. Crouch-Elliott:

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Materiel Command, U.S. Army is providing this response to the December 31, 2004 TPDES renewal application notice of deficiencies and request for additional information to complete the CSSA permit amendment application. Each comment below addresses issues identified in the TCEQ memorandum in the order listed.

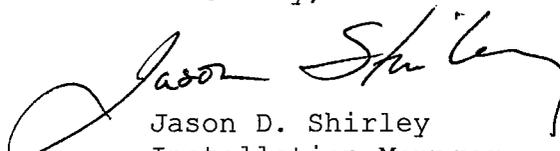
1. Enclosed with this letter are two checks: an additional \$50.00 fee for the increased number of adjacent landowners, which now exceeds 100 and \$1,242.00 for renewal of the TPDES Permit. The three other fees, which are not related to CSSA's activities, for underground storage tanks (USTs) \$250.00; solid waste disposals (SWD) \$4,492.81; and clean water quality (CWQ) \$1,440.00, are not included. These fees are from other Army installations that operate as their own entity and are under separate military commands. The UST and SWD fees are for Fort Hood in Killeen, TX. CWQ fees are Fort Sam Houston's in San Antonio, TX. CSSA has initiated contact with each Post and requested they resolve any outstanding fee issues with the TCEQ directly, however, CSSA has no authority to make these installations pay.
2. A copy of the receipt indicating that the initial \$350 application fee was received by TCEQ is provided as Attachment 1.
3. Topographic maps of two original digitized USGS 7.5 minute quads are provided in Attachment 2. The maps contain coordinates, quadrangle name and number, property boundaries of CSSA and Camp Bullis, the location of the wastewater treatment facilities and outfalls, the highlighted discharge route and the 1-mile radius around the treatment units.
4. As the CSSA Installation Manager, the Department of Defense has delegated authorities to this installation/entity via the undersigned to enter into agreements with the TCEQ. Therefore

the equivalent status as a regional director is not a valid argument for this matter.

5. An additional fee for \$50 is noted in item 1 above. Two revised landowner maps are provided in Attachment 3. These maps were modified based on your instruction to only include landowners adjacent to the property lines of Camp Stanley and Camp Bullis that are within 1-mile of the wastewater treatment units. Landowners 1-mile downstream of each outfall are also shown on map B-1. Attachment 4 contains a revised list of adjacent landowners and addresses. A new 3 ½ - inch disc containing the revised list of landowners and addresses is also enclosed with this letter. The list of landowners agrees with the landowner map.
6. Digital photos of the receiving stream in a downstream order from Outfall 001 are provided in Attachment 5. Most of the discharge from Outfall 001 occurs into a man-made channel or ditch/tributary receiving the effluent. Photo 7 shows the beginning of the natural drainage area of the tributary. This natural drainage is approximately ¾-mile long and ends at the Dominion subdivision. The tributary continues through the subdivision as a man-made drainage ditch until it enters Leon Creek. Leon Creek at this point and downstream to the end of the 3-mile route is a man-made drainage channel.
7. The 0.086 million gallons per day (mgd) flow rate for Outfalls 002 and proposed Outfall 003 on pages 6 and 7 are correct. The cover letter for the application listed the flow rates with too many decimal points (0.0864 mgd). The correct flow rates are 0.086 mgd.
8. There are two parts to the Notice of Receipt for Application that need to be revised. The correct flow rate is 86,000 gallons per day. There is no mention of the receiving streams for proposed Outfalls 003 and 004. The receiving stream for Outfall 003 is exactly the same as Outfall 001. The receiving stream for proposed Outfall 004 is exactly the same as Outfall 002. The eleventh line of the notice contains the words, "...Creek; thence to Upper Leon Creek via Outfall 001;..". I suggest these words be revised to state, "Creek; thence to Upper Leon Creek via Outfall 001 and proposed Outfall 003;". The twelfth line of the notice contains the words, "...thence to Salado Creek or directly to Salado Creek via Outfall 002". I suggest these words be revised to state, "thence to Salado Creek via Outfall 002 and proposed Outfall 004."

If you have a question or should you need additional information, please feel free to contact me at (210) 295-7416, Stephen W. Manning, P.E., Parsons at (512) 719-6066, or Jeff Aston, at (210) 698-5208.

Sincerely,



Jason D. Shirley
Installation Manager

Attachments

cc: Mr. Rod Hudson
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge Advocate
Ms. Steve Manning, P.E.
Parsons
Ms. Julie Burdey
Parsons