



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

6 July 2005

U-286-05

Texas Commission on Environmental Quality
Wastewater Permitting Section
Water Quality Division
Attn: Ms. Monica Vallin-Baez
PO Box 13087 (MC-148)
Austin, TX 78711-3087

Subject: Texas Pollution Discharge Elimination System (TPDES) Permit
Renewal Application, TPDES Permit No. WQ0003849-000, Camp
Stanley Storage Activity, Boerne, Texas

Dear Ms. Vallin-Baez:

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Materiel Command, U.S. Army is providing comments on the Draft STATEMENT OF BASIS/TECHNICAL SUMMARY. We have no comments on the draft public notice or draft TPDES permit.

1. The last paragraph on Page 1 of the STATEMENT OF BASIS/TECHNICAL SUMMARY needs additional details to fully describe the treatment methods associated with each outfall. The existing storage tank located upstream of Outfall 002 is 500 gallons, not 5,000. The following are our suggested revisions:

The wastewater system consists of d Domestic wastewater and vehicle wash water at Outfall 001, which are routed to a treatment plant then Outfall 001. Treatment units include a bar screen, Imhoff tank, trickling filter, chlorine contact basin, V-notch weir and a sludge drying bed. Well 16 groundwater, contaminated by volatile organic compounds (trichlorethylene and tetrachloroethylene), is treated in two 900 pound granular activated carbon (GAC) treatment units and discharge through Outfall 002. Contaminated groundwater produced by well drilling operations (Investigation Derived Waste (IDW)) and well purges are pumped to a 500 gallon storage tank. This contaminated IDW is treated by two cartridge filters and then the GAC treatment unit upstream of Outfall 002. A new GAC treatment unit (two 900 pound units) will be located near the existing domestic wastewater treatment plant and will discharge through Outfall 003. The new GAC treatment area will also contain a storage tank and filter treatment for IDW and well purges. IDW found not to be contaminated will be discharged through Outfall 004 without treatment. Groundwater at Outfall 002 and

~~Outfall 003, contaminated by volatile organic compounds (trichlorethylene and tetrachloroethylene), is pumped to a 5,000 gallon storage tank, than routed to two cartridge filters and than then routed to two 900 pounds pound granular activated carbon units (CAC). Uncontaminated groundwater will be discharge via Outfall 004 without treatment. Contaminated groundwater will be routed to Outfall 002 to be treated. Additional wells may be drilled nearby but down gradient of Well 16. The groundwater treatment units for Outfall 002 will be relocated to service wells.~~

2. The second paragraph on Page 2 of the STATEMENT OF BASIS/TECHNICAL SUMMARY needs some minor editing and should read as follows:

The effluent is discharge from Outfall 001 and Outfall 003 to an unnamed tributary of Upper Leon Creek, thence to Upper Leon Creek; and for Outfall 002 and Outfall 004 to an unnamed tributary of Salado Creek; thence to Salado Creek in ~~Segment~~ Segments No. 1907 and 1910, respectively of the San Antonio River Basin. The unclassified receiving waters have no significant aquatic life use for the unnamed tributary of Upper Leon Creek and the unnamed tributary of ~~the unnamed tributary of~~ Salado Creek. The designated uses for ~~Segment~~ Segments No. 1907 and 1910...

3. The last sentence of the third paragraph on page 2 of the STATEMENT OF BASIS/TECHNICAL SUMMARY suggests there may be additional consultation with the U.S. Fish & Wildlife Service (USF&W). This may raise public concern that there is an issue concerning endangered or threatened species where there is not. The third paragraph appears to be standard language and does not address prior consultations with USEPA and USF&W with regard to the recently approved Texas Surface Water Quality Standards (TSWQS). Therefore, CSSA requests the TCEQ to add additional text explaining permit effluent limits derived from the TSWQS are protective of all species including endangered or threatened species. The following is a recommended sentence that could be added to the end of the second paragraph:

This TPDES permit's effluent limits, which are derived from the Texas Surface Water Quality Standards (TSWQS), are protective of threatened and endangered species.

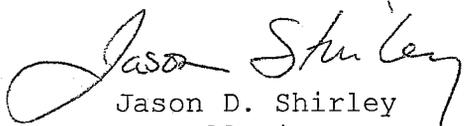
4. The second paragraph on page 4 of the STATEMENT OF BASIS/TECHNICAL SUMMARY does not explain why CSSA is not subject to federal effluent guidelines. CSSA suggests the first sentence be revised to read as follows:

Based on the SIC code of this military base, this permit ~~The facility discharges from a military base which is not subject to federal effluent guidelines.~~

5. On pages 14 and 26 of the STATEMENT OF BASIS/TECHNICAL SUMMARY, Leon Creek is shown as the receiving stream for Outfalls 002 and 004. This should be Salado Creek.

If you have any questions or should you need additional information, please feel free to contact me at (210) 295-7416 or Stephen W. Manning, P.E. of Parsons at (512) 719-6066.

Sincerely,


Jason D. Shirley
Installation Manager

cc: Mr. Greg Lyssy
EPA Region 6

Mr. Jim Cannizzo
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge Advocate

Mr. Chris Dzuik
TCEQ, Region 13

Ms. Julie Burdey
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