



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

5 November 2001

U - 006 - 02

Office of the Commander

Texas Natural Resource Conservation Commission  
San Antonio Regional Office, Region 13  
Waste Section Manager  
14250 Judson Road  
San Antonio, Texas 78233-4480  
Attn: Mr. Henry Karnei, Jr.

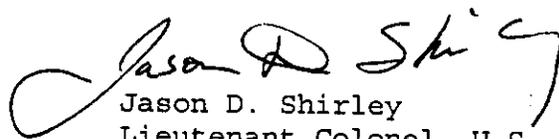
SUBJECT: Response to Compliance Evaluation Inspection on 11 July 2001  
TNRCC Industrial Solid Waste Registration #69026  
EPA Identification Number TX2210020739  
Bexar County

Mr. Karnei,

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Material Command, U. S. Army, is providing this response to you as a result of a Compliance Evaluation Inspection, which occurred on 11 July 2001, by Mr. Craig Meppen and Mrs. Agnieszka Hobson. All responses in the following pages are keyed to your original memorandum provided by your office dated 28 August 2001 to CSSA. We are confident all matters contained herein have been resolved.

Should there be a need for additional clarification of an issue, please do not hesitate to contact me at 295-7416. Thank-you again, for your cooperation and assistance.

Sincerely,

  
Jason D. Shirley  
Lieutenant Colonel, U.S. Army  
Commanding Officer

Attachments

cc: Mr. Greg Lyssy (all attachments, except AOC L)  
U.S. EPA, Region 6

Mr. Kirk Coulter (all attachments, except AOC L)  
Industrial and Hazardous Waste Section, TNRCC

Mr. Craig Meppen (all attachments)  
TNRCC, District 13

Mrs. Agnieszka Hobson (all attachments, except AOC L)  
TNRCC Region 13

Mr. Stan Citron (all attachments, except AOC L)  
U.S. Army, Army Materiel Command, Command Counsel,  
General Law Division (AMCCC-G)

Mr. Kent Grubb (all attachments, except AOC L)  
Judge Advocate General's Office, Fort Sam Houston

Ms. Susan Roberts (all attachments, except AOC L)  
Parsons Engineering Science

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

**A. RESOLVED ALLEGED VIOLATIONS**

**1. Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste**

Review of hazardous waste manifests generated since the last inspection revealed that there were a few items missing from the documents. Hazardous waste manifests 01901206, 01901253, 01901252, 01901251, 01901250 are missing the manifest document numbers and page numbers. Hazardous waste manifests 01901249 and 02218245 are missing manifest document numbers.

The alleged violation is considered resolved by memorandum provided on 30 July 2001 to Texas Ecologists correcting missing manifest document number extensions and page numbers.

**B. UNRESOLVED ALLEGED VIOLATIONS**

**2. Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste**

Wastes shipped using manifest 02218245 were disposed of using alternate facilities without CSSA's approval. CSSA did not take any steps to notify the transporter company (Why Wastewater?, Inc.) that the generator needs to approve the disposal company before their waste is submitted to a different disposal company not listed on the hazardous waste manifest. CSSA needs to notify the transporter of this violation and submit the documentation to the TNRCC San Antonio office.

The waste transporter did not advise CSSA that the item on manifest 02218245 was going to be taken to another treatment, storage, or disposal facility. The transporter acted on their own accord with no input from Camp Stanley Storage Activity (CSSA). The transporter was under the impression that the original facility, noted in section nine on the manifest, was going bankrupt. Why Wastewater contacted the contracting office for the Defense Reutilization and Marketing Office (DRMO), CSSA's broker for waste disposal activities, which manages the contract for which the disposal and payment for services authority comes, and were advised of the liability associated with sending the material to a company "going out of business". They unilaterally decided to send the material to another facility. The other facility is on the DRMO's list of approved facilities. Although the generator was not involved in the decision making or approval process, CSSA

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

is more comfortable with sending the material to a facility that will be in business for the foreseeable future, rather than becoming a PRP at one that has gone bankrupt. A copy of the memorandum dated 3 August 2001, which is in attachment 30 of the CEI, was provided to the regional office by the transporter. Also, CSSA provided a copy of the original letter sent to the transporter to the regional office. CSSA has prepared another memorandum to the Executive Director describing this transaction, and it is attached. CSSA considers this action completed.

**3. Recordkeeping and Reporting Procedures Applicable to Generators  
Shipping Hazardous Waste**

No exception report was submitted to the TNRCC Central Office to explain the delay in final disposal of wastes shipped using manifest 02218245. CSSA was required to submit to the TNRCC an exception report if a signed copy of the hazardous waste manifest document (by the disposal company) was not received by the facility within 45 days of the date the waste was accepted by the initial transporter. CSSA needs to complete an exception report for manifest 002218245 and submit the document to the TNRCC Central Office. A copy of the documentation also needs to be submitted to the TNRCC San Antonio office.

CSSA did not file an exception report for the shipment discussed in paragraph two above, as was required after the 45-days from the original date of transport. However, for the transaction to take place between the transporter and the newly agreed upon disposal facility, a proper characterization/profile of the material was necessary before approval or acceptance could be completed. That process took additional time before the material was received at the new facility. A copy of the memorandum dated 3 August 2001, which is in attachment 30 of the CEI, was provided to the regional office by the transporter. Also, CSSA provided a copy of the original letter sent to the transporter to the regional office. CSSA has prepared another memorandum (exception report) to the Executive Director describing this transaction. CSSA considers this action completed.

**4. General Prohibitions/Texas Water Code**

The following discharges were documented during the inspection:

- A) Wheelabrator discharge located in front of Building 90-2

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

B) Wheelabrator discharge located on the side of Building 90-2 facing Building 90

CSSA needs to evaluate the extent of the contamination caused by the above listed unauthorized discharges and remediate any contamination that might be present. The documentation relating to the delineation and remediation of the discharges needs to be submitted to the TNRCC San Antonio office.

The alleged discharge noted for Building 90-2 is not unauthorized. The media on the surface of the ground has been there at least since the early 1960's. The area around the building has non-hazardous metal debris and is listed as AOC-68 under CSSA's RFI program as an area for additional investigations. Therefore, the site is covered under the Administrative Order on Consent that was signed between CSSA and EPA in May 1999.

Following the CEI, CSSA collected a sample from the Building 90-2 slag material. The sample was submitted for TCLP analyses for the following: antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, and silver. Analyses indicated the material is non-hazardous. A copy of the analytical results and chain of custody are attached.

Visual observation of the Building 90-2 waste material indicated it was the same material CSSA was in the process of removing at AOC-50. The analytical results helped confirm this evaluation. Since CSSA contractors had already mobilized to the site to complete the AOC-50 remediation/removal action, the Building 90-2 waste/surficial debris was added to the contractor's disposal task. During the week of 6 August 2001, the waste material and soil from around Building 90-2 was removed using a backhoe and loader and placed into a 20 cubic yard roll-off container. The characterization information was passed on to Waste Management Inc. and the waste material was taken to their Covel Gardens facility for disposal as a Class 2 non-hazardous material on 21 August 2001. Copies of the waste disposal manifests are attached. In total, approximately 15 cubic yards of material was removed.

Three confirmation soil samples were collected after the waste material had been removed. The analytical results

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

have yet to be verified and validated. A summary of the preliminary/draft data is attached. CSSA considers this interim action complete and that additional work will be scheduled in the future to further address this site. The central and regional offices will be kept informed of planned work and results of analytical data in the future.

**C) Mop water discharge located on the side of Building 90 facing Building 90-2**

CSSA needs to evaluate the extent of the contamination caused by the above listed unauthorized discharges and remediate any contamination that might be present. The documentation relating to the delineation and remediation of the discharges needs to be submitted to the TNRCC San Antonio office.

A mop and mop bucket were observed during the CEI and a potential discolored area was the result of dumping rinse water on the ground. If the rinse water, which is generated during cleaning of the Building 90 restrooms and offices, was dumped on the ground there would be little to no chemicals from Building 90 in the water. As a result, CSSA does not see the necessity of delineating the extent of possible contamination related to the mop water release, and does not believe remediation would be appropriate.

CSSA Environmental has advised the building occupants and sanitary engineers of proper clean up procedures, which requires water be discharged into a sink in the building. CSSA considers this action completed.

**D) Nickel Penetrate discharge from the pipes that previously led to hazardous waste storage tanks that were located outside Building 90-1.**

CSSA needs to evaluate the extent of the contamination caused by the above listed unauthorized discharges and remediate any contamination that might be present. The documentation relating to the delineation and remediation of the discharges needs to be submitted to the TNRCC San Antonio office.

Immediately after the release discovery, the CSSA's engineer craft team (public works personnel) were called to repair the dripping/leaking pipe. On 13 July 2001, CSSA collected a soil sample from the area directly below the nickel penetrate (sodium hydroxide) release point. The sample was tested for total arsenic, barium, cadmium,

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

chromium, lead, mercury, selenium, silver, and pH. Lead, chromium, and cadmium appear to exceed draft CSSA background levels for metals of this soil type. Also, the pH was elevated, which is no surprise considering nickel penetrate is very basic. Copies of the analytical results and chain of custody documentation are attached. Based on these initial sampling results, further investigation will be required at this site. The central and regional offices will be kept informed of planned work and results of analytical data in the future.

**5. Notification Requirements**

During the inspection a Solvent Recovery System was observed in Building 90-1. The system is a continuous feed recycling unit. Waste (solvent residues) generated by this system is classified as ignitable (D001) hazardous waste (waste code 4011609H). Conversations with Mr. Murphy indicated that this system has not been operational for several months and that a vendor comes out to CSSA to recycle any spent solvent in the interim. Review of the facility Notice of Registration (NOR) revealed that the waste cleaning solvent (the liquid recycled) is not listed as a waste stream. A violation was cited for failing to list the waste cleaning solvent on the NOR, along with the waste management unit used to store the waste, and the disposition of the waste. The facility needs to add this waste stream to the NOR and submit documentation to the San Antonio region office showing the correction of this violation.

To add clarity to the aforementioned, spent solvents that are removed from solvent tanks/vats located in Building 90 are placed into a 55-gallon drum at a satellite accumulation point (SAP) inside the building. When removed from the SAP the material is taken to Building 90-1, where the solvent recycling unit is located. The recycled solvent is reused and the solids/still bottoms are disposed of as hazardous waste, under waste code 4011609H. The solids are characteristically hazardous, due to ignitability and some metals - D007 (chromium), D008 (lead), and D009 (mercury). The violation cited is for the solvent taken from the tanks prior to recycling.

CSSA has managed the material by using the eventual waste code number, instead of creating an interim waste stream/waste code number for the drummed waste. If a waste code were created, this waste stream would never be disposed of off-post and may create confusion in tracking

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

waste generation volumes. However, after investigating "point of generation" interpretations, CSSA concedes that transferring this waste from the process to a drum is a distinct point of generation and a separate waste code is needed. Characterization of this waste stream will be performed and the NOR updated accordingly. CSSA maintains that this waste stream was managed as a hazardous waste in accordance with 40 CFR §262 Subpart C. A copy of the NOR modification memorandum is attached.

**6. Recordkeeping**

The facility was not able to provide a record of the 1998 annual waste summary at the time of the July 11, 2001 CEI. CSSA needs to obtain a copy of the filed summary and submit the documentation to the San Antonio region office.

A copy of the 1998 annual waste summary is attached for your records. The document was sent to the central office on 26 February 1999 via STEERS at 3:14:02 p.m. CSSA considers this action closed.

**7. Documentation Required**

During the inspection, CSSA did not provide hazardous waste determination for contaminated groundwater and other wastes generated during investigation and remediation activities, including the soils generated during the remediation at the Oxidation Pond (SWMU No. 004) site, soils generated boring and monitoring well installation, and well development and purge water. The waste determination needs to be submitted to the TNRCC San Antonio office.

This alleged violation covers several activities on the installation (i.e. groundwater investigations and RFI's) which are addressed separately below:

A summary of the hazardous waste determinations at SWMU No. 004 - Oxidation Pond (a.k.a. SWMU O-1) site was included in the Interim Measures and Partial Facility Closure Report for SWMU O-1 submitted to TNRCC offices in Austin and San Antonio on 8 October 2001. The following is an excerpt from page 2-3, section 2.2.3 of the O-1 Report:

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

"Soils within the lateral extent were characterized for waste disposal in accordance with 30 TAC 335 Subchapter R. Ten waste characterization samples were collected from within the unit boundaries for establishing proper waste characterization data. Samples were analyzed by USEPA SW 846 Method 1311 Toxicity Characteristic Leaching Procedure (TCLP) for constituents of concern. Data results indicated that the soils met Class 2 non-hazardous levels specified in 30 TAC 335 Subchapter R. The soils were profiled into Waste Management Inc.'s Covell Gardens facility".

Summary tables of the analytical results, waste profile, sampling location map, and correspondence with Waste Management Inc. are attached.

CSSA's IDW policies are outlined in three letters attached to these responses. The first and second letters are from CSSA's consultant Parsons Engineering Science to the TNRC requesting guidance. The first letter outlines CSSA's request for approval of our revised IDW management plan. The third letter is from Richard Clarke, TNRC Corrective Action Section, which acknowledges receiving the CSSA IDW policy and outlines the requirement to manage all IDW until analytical results are returned. If the IDW is less than risk reduction standard (RRS) number 2, the material can be disposed of on-site. If it is greater than RRS-2, the material will need to be taken off-post for proper disposal. The second letter from Parsons to TNRC was for additional clarification and confirmation that we should utilize RRS-2 industrial groundwater protection standards for IDW comparison and that analyses of samples collected from the soil borings will be adequate for IDW characterization.

CSSA has identified 35 SWMUs, 38 AOCs, and five rifle management units (RMUs). In 1999 and 2000, investigations were conducted at 33 of the SWMUs and 20 AOCs. Investigation work at these sites often involves drilling soil borings and the collection and analyses of soil and ground water samples. IDW characterization and disposal at these sites has followed the above guidance. In general, shallow soil borings (less than 40 feet) generate very

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

little in the way of IDW. Soils are thin, and when hollow stem augers meet bedrock, drilling switches to air rotary methods. IDW associated with air rotary includes small quantities of dust and rock core. If groundwater is encountered in a shallow boring, grab groundwater samples are collected using a bailer. The borings are not purged or developed prior to sampling, and the sample is considered valid as screening data only.

Work being conducted to evaluate groundwater contamination under the facility has had a myriad of soil, rock, and water samples since November 2000. A spreadsheet of these analytical results was provided to the investigators at the time of the CEI, and is provided in attachment 7 of the CEI report. Minor additions included in an updated table are referred to below.

In 2000 and 2001, CSSA has installed 20 new on-post monitoring wells. Depths of the wells range from 9 to 495 feet below ground level. Five shallow wells near AOC-65 have been completed with 10 - 15 foot screened intervals in perched water zones ranging from 9 - 35 feet in depth. Fifteen deep wells have been completed with 25 foot screened intervals in the Lower Glen Rose, Bexar Shale, or Cow Creek members of the Middle Trinity Aquifer ranging from 296 - 495 foot depths. Installation of approximately 24 additional wells is being planned at the present time.

All drilling, development, and purge water, and cuttings generated during well installations have been contained at the drilling sites. The water has been placed in lined 20 cubic yard roll-off containers. The cuttings, which are developed at the well borehole, are contained using a poly-lined area built around the wellhead. They are eventually transferred, as necessary, to a lined roll-off container when the area becomes full.

There have been 51 waste characterization samples collected during the initial phase of well installations at CSSA (January - September, 2001). Because volatile organic compounds (VOCs) are the chemicals of concern, all of these samples were submitted for these analyses. An updated summary table of the IDW sampling is attached. Laboratory

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

reports of analyses are available upon request. Analyses of the samples found little to no VOCs. Drilling waters from MW-7 Lower Glen Rose (LGR), MW-8 LGR, MW-8 Cow Creek (CC), MW-10 CC and development waters from MW-5 LGR had detectable levels of VOCs. PCE, TCE, and cis-1-2 DCE were found in MW-5 LGR development water. Acetone and 2-butanone were identified in samples from MW's-7, -8, and -10. One sample was analyzed for metals. A table of these results is attached. Values were compared to draft background or RRS-2. Zinc was identified slightly above the draft background value associated with the upper/lower glen rose. Since background data is still under review these values are not considered complete at this time.

Further clarification is warranted regarding the updated table provided for roll-off container samples taken at MW-10. In some cases RLs listed for PCE and TCE have been elevated above the MCL and in some cases the MDL is also above the MCL. This can only be explained as interference in the water matrix by the addition of drilling foam. CSSA took discrete interval samples throughout the borehole, to prevent any downward migration of contaminants during drilling operations, which showed little to no PCE and TCE detections. This table is also attached. The highest reported value for discrete samples indicated PCE was 1.51 parts per billion and TCE was not detected. Based on these discrete sample results, the roll-offs contained no PCE or TCE above the MCL and the elevated RLs and MDLs are misleading.

Water and cuttings that had no VOC contamination or were less than the MCL for the VOCs were discharged to the ground. Water was typically released near the drilling location, while the cuttings were taken to two designated areas for disposal.

CSSA will continue to characterize IDW materials at SWMUs, AOCs, RMUs, and during the well installation projects.

**AREAS OF CONCERN - 2001 CEI**

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

*A. CSSA needs to evaluate their NOR and confirm that all of the information is current. During the July 11, 2001 CEI, several waste streams were not correctly described.*

A review of the CSSA NOR has been initiated. A copy of the NOR modification memorandum is attached.

*B. CSSA needs to make sure that the activated charcoal from the groundwater treatment system is properly characterized (hazardous or non-hazardous) prior to disposal. In case the waste charcoal is found hazardous CSSA needs to assign a waste stream number and add the information to the NOR. The facility needs to evaluate their generator status with regards to the volume of hazardous waste generated once the charcoal is disposed of.*

Currently there are two granular activated carbon filter systems located at CSSA. One system is a permanent system that was installed to treat development and purge water generated during well installations and sampling. The second is a rental system that was brought to CSSA as part of the pumping tests that were conducted at Well CS-16 recently.

1) The permanent system includes two carbon canisters that can be run in parallel or series, depending on how the system is configured. Maintenance of this system includes the collection and analyses of water samples from between the canisters when they are in series mode. These samples will be used to monitor for VOC break through. When break through occurs, a composite sample will be collected from the lead canister and analyzed for TCLP VOCs. The analytical results will be used to make the hazardous waste determination. If the spent carbon is hazardous, CSSA will transport and dispose of the material in accordance with all hazardous waste regulations and modify the NOR as appropriate.

2) A composite sample was collected from the second/rented GAC unit in September 2001. The analytical results from this sample indicated that the carbon material was non-hazardous. Copies of the characterization analytical results, waste profile, and concentration calculations are attached. Arrangements are currently being made to ship the carbon containing

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

canisters to a regenerating facility as Class 2 non-hazardous waste. Since the carbon was determined to be non-hazardous, there is no need to modify the CSSA NOR.

CSSA's will evaluate its' generator status and NOR if the charcoal is deemed hazardous.

*C. The facility needs to submit a copy of the notification letter sent to the laundry service (provided the washing of the solvent contaminated rags) to the TNRCC San Antonio region office. Before the rags are washed the laundry facility needs to be notified what the contamination chemical is.*

CSSA will draft a letter that will be sent to the laundry facility explaining the chemicals that could be on the rags that are cleaned. A copy of the letter will be provided to the TNRCC San Antonio office when sent.

*D. During the July 11, 2001 CEI, a roll-off container was observed with an incorrect label. A hazardous waste label identified the generator as Kelly AFB. CSSA needs to make sure that all of the incorrect labeling is removed from the containers prior to use.*

The referenced roll-off had previously been used at Kelly AFB. It had been decontaminated, prior to delivery, but the hazardous waste label was not removed. CSSA has alerted it's contractors of the oversight and they will make certain that all roll-offs will be properly labeled in the future.

*E. Conversations with Mr. Murphy indicated that waste gasoline was disposed of from the motor pool area. CSSA needs to provide the TNRCC San Antonio region office with a copy of the hazardous waste manifest used for shipment of the waste gasoline for disposal.*

CSSA's reference to recent gasoline disposal during CEI discussions was in error. Based on CSSA's review there are no waste records within the last five years for a gasoline disposal. CSSA considers this action closed.

*F. Conversations with Mr. Murphy indicated that wipe samples have been collected from Building 40 (SWMU 002). The facility needs to evaluate the possibility of collecting concrete chip samples to better evaluate the extent of contamination, if any. The documentation regarding any future sampling needs to be submitted to TNRCC San Antonio region office.*

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

CSSA has drafted a closure report for Building 40, which will be forwarded to TNRCC when completed. During waste storage operations at the building there were no indications or records of spills or releases. Swipe samples were taken over the majority of the floor to determine if any releases went undetected. There were no contaminants identified in the sample results. CSSA does not see the necessity for conducting additional "chip" sampling from the concrete floor.

CSSA notified TNRCC on 17 December 1996 of the impending closure of the building. An acknowledgement was received on 17 January 1997, which is attached, that provided the notice to proceed.

*G. The TNRCC San Antonio region office is requesting CSSA provide a summary listing the EPA 3008 (h) order deliverables with the required submittal dates, along with the dates these deliverables were submitted to EPA and/or TNRCC. This type of summary will be useful to ensure that all deliverables were submitted as required by the EPA 3008(h) order.*

The RCRA 3008(h) Administrative Order on Consent has deliverables fall into four program areas: Interim Stabilization Measures, RCRA Facility Investigation, Corrective Measures Study, and Corrective Measures Implementation. Required progress reports related to each of these program areas have been combined into one heading. For your information, a summary of deliverables associated with the Order to-date is provided below:

<b>Deliverable Title</b>	<b>Order Due Date</b>	<b>Date Submitted</b>
<b>Interim Stabilization Measures</b>		
Interim Stabilization Measures Work Plan	5 September 1999	August 1999
Interim Stabilization Measures Partial Facility Closure Report	(60 days after work completed)	October 2000
<b>RCRA Facility Investigation</b>		
Current Conditions Report	5 August 1999	August 1999
RCRA Facility Investigation Work Plan	5 September 1999	September 1999
RFI Findings Report	(730 days after Work Plan approval)	To Be Determined
Risk Assessment Report	(60 days after RFI Report)	To Be Determined
Investigation Analyses	Concurrent with Risk Assessment	To Be Determined

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

Treatability Studies	As directed by EPA	To Be Determined
Corrective Measures Report	(120 days after Final RFI Report)	To Be Determined
<b>Corrective Measures Implementation</b>		
Corrective Measures Implementation Program Plan	(120 days after EPA approves remedy selection).	To Be Determined
Corrective Measures Design Plan	(In accordance with the schedule in the EPA approved Final CMI Program Plan)	To Be Determined
Pre-Final Design	(In accordance with the schedule in the EPA approved Final CMI Program Plan)	To Be Determined
Final Design	(In accordance with the schedule in the EPA approved Final CMI Program Plan)	To Be Determined
Draft Construction Quality Assurance Plan	(In accordance with the schedule in the EPA approved Final CMI Program Plan)	To Be Determined
Final Construction Quality Assurance Plan	(In accordance with the schedule in the EPA approved Final CMI Program Plan)	To Be Determined
Construction of Corrective Measures	(60 days after EPA approval of Final Corrective Measures Design Plan and Final Construction Quality Assurance Plan).	To Be Determined
Corrective Measures Construction Report	(In accordance with EPA approved Final Corrective Measures Design Plan).	To Be Determined
Progress reports During Operation and Maintenance	Quarterly	To Be Determined
<b>Progress Reports</b>		
1 <sup>st</sup> Quarterly Progress Report (May 1, - July 30, 1999)	10 August 1999	August 1999
2nd Quarterly Progress Report (July 31, - October 31, 1999)	10 November 1999	November 1999
3 <sup>rd</sup> & 4 <sup>th</sup> Quarter Progress Report (November 1, 1999 - April 30, 2000)	10 May 2000	May 2000
5 <sup>th</sup> Quarterly Progress Report (May 1, 2000 - July 31, 2000)	10 August 2000	August 2000
6 <sup>th</sup> Quarterly Progress Report	10 November 2000	November 2000

**RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001**

(August 1, - October 31, 2000)		
7 <sup>th</sup> Quarterly Progress Report (November 1, 2000 - January 31, 2001)	10 February 2001	February 2001
8 <sup>th</sup> Quarterly Progress Report (February 1, 2001 - April 30, 2001)	10 May 2001	May 2001
9 <sup>th</sup> Quarterly Progress Report (May 1, 2001 - July 31, 2001)	10 August 2001	August 2001
10 <sup>th</sup> Quarterly Progress Report (August 1, 2001 - October 31, 2001)	10 November 2001	5 November 2001
Future Progress Reports	Quarterly	Every Quarter

**H. Mop water from Building 90 needs to be disposed of down the sanitary sewer.**

This was discussed in alleged violation (#4). Mop water will be disposed of in the CSSA sanitary sewer system via a sink.

**I. The facility did state that a Source Reduction and Waste Minimization Plan was prepared for the CSSA installation, however, it was not reviewed at the time of the CEI. The TNRCC is requesting a copy of the plan to be submitted to the San Antonio office.**

CSSA, due to its current generator status, as a conditionally exempt small quantity generator, is not required to prepare this plan. However, should CSSA's status change it will prepare the plan as necessary.

**J. Well 16 pump test issues are currently under TNRCC review and will be addressed in a later report. Additional violations and/or areas of concern may result from this review.**

CSSA has no comment on this issue at the present time.

**K. CSSA did not provide hazardous waste handling training records for Mr. Brian Murphy. CSSA needs to submit the training records. Mr. Murphy needs to obtain hazardous waste training annually due to the position being held by Mr. Murphy at the installation.**

Although not current, Mr. Murphy has had 40-hour course on hazardous waste operations and training. CSSA will investigate obtaining training for him in the near future and provide a copy of the training certificate when completed.

RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001

*L. CSSA needs to submit a copy of the sample results for the split samples collected during the Sampling Inspection conducted on April 8, 2000 by Mr. Malcolm Ferris, TNRCC San Antonio office investigator.*

Summary tables of the analytical results as well as the actual laboratory reports of analyses are attached.

RESPONSE TO SUMMARY OF VIOLATIONS  
CAMP STANLEY STORAGE ACTIVITY (CSSA)  
COMPLIANCE EVALUATION INSPECTION (CEI) 11 July 2001

Summary of Attachments

- Exception Report and Waste Disposition Correspondence regarding Hazardous Waste Manifest 022-18245
- Shipment Building 90-2 Wheelabrator slag - analyses and COC form
- Building 90-2 Wheelabrator slag - copies of the waste disposal manifests
- Building 90-2 confirmation samples
- Building 90-1 leaking pipe - copies of analytical results and COC form
- NOR Modification Documentation
- Annual waste summary report for 1998
- SWMU O-1 - analytical results, waste profile, sampling location map, and Waste Management Inc. correspondence
- IDW Memorandums from TNRCC and Parsons
- Well installations - table of analytical results for soil, rock, and water matrices
- Rented GAC unit composite sample results table, waste profile, and laboratory report
- TNRCC Memorandum - Notice to Proceed with Closure of Building 40
- Building 90 AOC-65 split sample analytical results table and laboratory report

Violation No. 2

- Exception report for manifest no. 022-18245
- Correspondence with waste hauler regarding final disposition of hazardous waste listed on manifest no. 022-18245
- Manifest no. 022-18245



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

REPLY TO  
ATTENTION OF

5 November 2001

U - 005 - 02

Office of the Commander

Mr. Jeffrey Saitas  
Executive Director  
Texas Natural Resource Conservation Commission (MC 109)  
P.O. Box 13087  
Austin, Texas 78711-3087

Subject: Exception Report for Manifest 02218245  
Camp Stanley Storage Activity, Boerne, Texas  
EPA Identification Number: TX2210020739,

Dear Mr. Saitas,

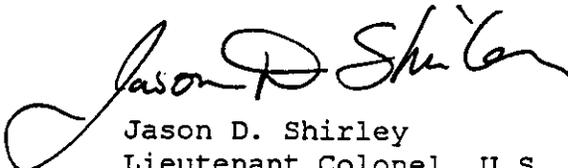
Camp Stanley Storage Activity (CSSA) shipped one fiber drum of waste flammable liquid (mixed solvents) to Disposal Systems Incorporated on October 10, 2000 under manifest number 02218245. CSSA did not receive the return copy of the waste manifest within 45 days as required by TNRCC rules and regulations (30 TAC §335.13) and is hereby providing this exception report.

CSSA requested and received a formal response from the transporter, Why Wastewater?, Inc., which explains the circumstances about this drum of material. A copy of their response is attached

A copy of the manifest is also attached for your reference.

Should you have any questions or comments please contact Mr. Brian K. Murphy, CSP, CSSA's Environmental Officer on (210) 698-5208.

Sincerely,

  
Jason D. Shirley  
Lieutenant Colonel, U.S. Army  
Commanding Officer

Enclosure

cc: Mr. Kirk Coulter  
TNRCC, Industrial and Hazardous Waste Section

Ms. Abigail Powers  
TNRCC, Region 13

Mr. Craig Meppen  
TNRCC, Region 13

Mr. Kent Grubb  
U.S. Army, Medical Department Center and School and Fort  
Sam Houston, Office of the Staff Judge Advocate General



P.O. BOX 12310 EL PASO, TEXAS 79913  
915/581-6602 ext.17

August 3, 2001

Department of the Army  
Camp Stanley Storage Activity, RRAD  
25800 Ralph Fair Road  
Boerne, Texas 78015-4800

Attention: Jason D. Shirley, Lieutenant Colonel

Subject: Camp Stanley Storage Activity, Boerne, Texas  
EPA Identification Number: TXD2210020739, Manifest Tracking Questions,  
Manifest 02218245

Dear Lieutenant Colonel Shirley:

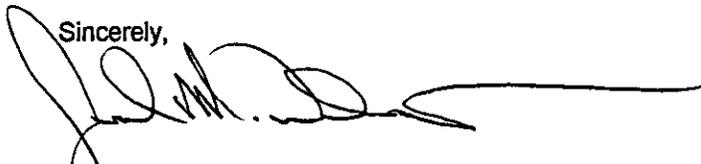
This letter is in response to the correspondence we received from you dated July 25, 2001 regarding the fiber drum of waste flammable liquid manifested to Disposal Systems, Inc. under manifest number 02218245.

We were informed that Disposal Systems, Inc. was declaring bankruptcy late October of 2000. We spoke with the contracting officer for this contract concerning the liability that both Camp Stanley and Why Wastewater?, Inc. would face sending material to a facility that was in the bankruptcy process and the likelihood that their name would be removed from the DRMS approved list. We were told that we would be held responsible and liable for any waste that was not properly handled and properly disposed of by the disposal site since it was our decision where we were ultimately sending the waste. During this conversation, we stated that this material would most likely go to another site for disposal, as we were not willing to take such a risk. After much consideration, we determined that Waste Control Specialists was the facility that this material must go to.

At this point it was necessary for us to profile all of the waste material that was in this load to Waste Control Specialists for their approval. The material was delivered to Waste Control Specialists on 11/15/00 but all of the profiles had not been accepted. All of the waste material was finally approved for disposal at Waste Control Specialists on 01/08/01 hence the mark over in the date on section 20.

Attached, is a letter from Waste Control Specialists stating the correct date as written on the manifest. If you have further question, please contact me.

Sincerely,



Jack M. Wheatley  
President

Enclosure

cc: Mr. Kirk Coulter  
TNRCC, Industrial and Hazardous Waste Section

Ms. Abigail Powers  
TNRCC, Region 13

Mr. Craig Meppen  
TNRCC, Region 13

Ms. Agnieszka Hobson  
TNRCC, Region 13

Mr. Kent Grubb  
U.S. Army, Medical Department Center and School and Fort Sam Houston, Office of the Staff  
Judge Advocate General

WCS  
998 W. HWY 176  
Eunice, N.M. 88240

facsimile transmittal

To:  
Barbara  
Wilson

Fax -915-  
581-8043

From: Anne Dean

DATE 8-  
3-01

Re:

Pages: 1

CC:

Urgent     For Review     Please Comment     Please Reply     Please Recycle

Barbara,

Per our conversation on 8-1-01 waste on manifest 2218245 was received on January 8, 2001 after profiling was completed. Note that WCS is the alternative facility listed on the manifest, waste was shipped by Camp Stanley Storage Facility on 10-10-00, when waste first arrived at WCS the waste profiles were not submitted or approved.

Anne Dean

If you have any questions please call Anne Dean at 888-789-2783.



DEPARTMENT OF THE ARMY  
CAMP STANLEY STORAGE ACTIVITY, RRAD  
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800  
25 July 2001

U - 28 - 01

Office of the Commander

Ms. Barbara Wilson  
Why Wastewater Incorporated  
P.O. Box 12310  
El Paso, Texas 79913

Subject: Camp Stanley Storage Activity, Boerne, Texas  
EPA Identification Number: TXD2210020739, Manifest  
Tracking Questions, Manifest 02218245

Dear Ms. Wilson,

Camp Stanley Storage Activity (CSSA) shipped one fiber drum of waste flammable liquid (mixed solvents) to Disposal Systems Incorporated in Deer Park, Texas on October 10, 2000 under manifest number 02218245. CSSA requests a formal response that discusses the circumstances in which the drum transported by your company was taken to Disposal Systems and then sent an alternate one, without conferring with the installation, why the date on the receipt of the waste is marked over, provide the correct date and eventual disposal of the drum of material.

A copy of the manifest is attached for your reference.

Your cooperation and assistance in addressing the issues raised above are appreciated. Should you have any questions or comments please contact Mr. Brian K. Murphy, CSP, CSSA's Environmental Officer on (210) 698-5208.

Sincerely,

Jason D. Shirley  
Lieutenant Colonel, U.S. Army  
Commanding Officer

Enclosure

cc: Mr. Kirk Coulter  
TNRCC, Industrial and Hazardous Waste Section

Ms. Abigail Powers  
TNRCC, Region 13



MW 17205 911

**\*\*CERTIFICATE OF DISPOSAL REQUIRED\*\***  
 SP4400-99-0011 Form approved, OMB No. 2050-0039.  
 D.O.#00105

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>T X 2 2 1 0 0 2 0 7 3 9</b>		Manifest Document No. <b>1782491</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>CAMP STANLEY STORAGE FACILITY 25800 RALPH FAIR RD BOERNE, TX 78015-4800 POC: RALPH CHAVEZ</b>				C. State Manifest Document Number <b>02218245</b>					
4. Generator's Phone ( (210) 698-5208				6. US EPA ID Number <b>T X D 1 . 1 . 3 . 1 . 0 5 6 5</b>		B. State Generator's ID <b>69026</b>		C. State Transporter's ID <b>40321</b>	
5. Transporter 1 Company Name <b>WHY WASTEWATER?, INC.</b>				7. Transporter 2 Company Name		D. Transporter's Phone <b>(915) 581-6602</b>		E. State Transporter's ID	
9. Designated Facility Name and Site Address <b>DISPOSAL SYSTEMS INC. 2525 BATTLEGROUND RD. DEER PARK, TX. 77536</b>				10. US EPA ID Number <b>T X D 0 0 . 0 7 1 9 5 1 8</b>		F. Transporter's Phone		G. State Facility's ID <b>32299</b>	
H. Facility's Phone <b>(281) 930-2504</b>				11A. HM		11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)		12. Containers No. Type	
11a)		11b)		11c)		a. <b>RQ, WASTE FLAMMABLE LIQUID, NOS, 3, UN1993, PG II (MIXED SOLVENTS) CADMIUM, CHROMIUM, MERCURY D001, D006, D007, D009</b>		b. c. d.	
						DF		0100 P	
						Waste No. <b>4011609H D001, D006, D007, D009</b>			
J. Additional Descriptions for Materials Listed Above <b>WP14153</b>				ERG 128		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information <b>ALTERNATIVE FACILITY: WASTE CONTROL SPECIALIST 9998 HWY., 176 W., ANDREWS, TX 79914 - EPA No. TXD988088464 - State ID 50358. EMERGENCY CONTACT: 24 HR, JOHN GLASS 210-925-3100 EXT 319. ALWAYS WEAR PPE. IN THE EVENT OF AN EMERGENCY: DAFB SECURITY SVCS 210-925-6906</b>				16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name <b>BRIAN K. MURPHY</b>				Signature <i>Brian K. Murphy</i>				Month Day Year <b>10   10   00</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name <b>Arturo Carranza</b>				Signature <i>Arturo Carranza</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name				Signature	
19. Discrepancy Indication Space				20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name <i>Ken Crawford</i>				Signature <i>Ken Crawford</i>				Month Day Year <b>10   08   00</b>	

Violation No. 4  
Parts A, B, and D

- Building 90-2 Wheelabrader slag - analyses and COC form
- Building 90-2 Wheelabrader slag - copies of the waste disposal manifests
- Summary of Preliminary Draft AOC 68 Confirmation Analytical
- Building 90-1 leaking pipe - copies of analytical results and COC form



**SAN ANTONIO**  
TESTING LABORATORY, INC.

**REPORT OF CHEMICAL ANALYSIS**

Report No. 2001-07-71  
Page 1 of 2

Camp Stanley Storage Facility  
15800 Ralph Fair Rd  
Boerne, TX 78015-4800  
ATTN: Brain Murphy

Date Received:  
07-13-2001

Date Reported:  
07-25-2001

Sample Type:  
Solid

**SAMPLE ID#1: Wheelabrator Slag**

PARAMETER	RESULTS	UNITS	MDL	METHOD #	DATE ANALYZED
TCLP Antimony	<0.10	mg/L	0.10	6010B	07-16-01
TCLP Arsenic	<0.10	mg/L	0.10	6010B	07-16-01
TCLP Barium	1.92	mg/L	0.10	6010B	07-16-01
TCLP Beryllium	<0.04	mg/L	0.04	6010B	07-16-01
TCLP Cadmium	0.136	mg/L	0.05	6010B	07-16-01
TCLP Chromium	<0.10	mg/L	0.10	6010B	07-16-01
TCLP Lead	<0.10	mg/L	0.10	6010B	07-16-01
TCLP Mercury	<0.002	mg/L	0.002	7470	07-16-01
TCLP Nickel	<0.10	mg/L	0.10	6010B	07-16-01
TCLP Selenium	<0.10	mg/L	0.10	6010B	07-16-01
TCLP Silver	<0.50	mg/L	0.50	6010B	07-16-01

**SAMPLE ID#2: Paint Laquer, Thinner Waste**

PARAMETER	RESULTS	UNITS	MDL	METHOD #	DATE ANALYZED
TCLP Chromium	5.94	mg/L	0.10	6010B	07-16-01
TCLP Lead	38.1	mg/L	0.10	6010B	07-16-01
TCLP Mercury	0.0238	mg/L	0.002	7470	07-16-01
Flashpoint	<70	°F	-	1010	07-17-01

**SAMPLE ID#3: 90-1 Sodium Hydroxide Release**

PARAMETER	RESULTS	UNITS	MDL	METHOD #	DATE ANALYZED
Total Arsenic	<1.00	mg/Kg	1.00	6010B	07-16-01
Total Barium	27.6	mg/Kg	1.00	6010B	07-16-01
Total Cadmium	3.67	mg/Kg	0.50	6010B	07-16-01
Total Chromium	37.6	mg/Kg	1.00	6010B	07-16-01
Total Lead	259	mg/Kg	1.00	6010B	07-16-01
Total Mercury	<0.20	mg/Kg	0.20	7471	07-16-01
Total Selenium	<1.00	mg/Kg	1.00	6010B	07-16-01
Total Silver	<2.00	mg/Kg	2.00	6010B	07-16-01
pH	11.61	su	-	9045C	07-16-01



**SAN ANTONIO**  
TESTING LABORATORY, INC.

REPORT OF CHEMICAL ANALYSIS

Report No. 2001-07-71

Page 2 of 2

PARAMETER	BLANK RESULTS	UNITS	QUALITY CONTROL DATA		ORIGINAL RESULTS	DUPLICATE RESULTS	% RPD
			LCS %REC	MS %REC			
<b>TCLP</b>							
Antimony	<0.10	mg/L	94	95	<0.10	<0.10	<1
Arsenic	<0.10	mg/L	98	99	<0.10	<0.10	<1
Barium	<0.10	mg/L	105	106	1.76	1.68	5
Beryllium	<0.04	mg/L	93	94	<0.04	<0.04	<1
Cadmium	<0.05	mg/L	99	99	<0.05	<0.05	<1
Chromium	<0.10	mg/L	92	93	<0.10	<0.10	<1
Lead	<0.10	mg/L	97	97	<0.10	<0.10	<1
Mercury	<0.002	mg/L	95	98	<0.002	<0.002	<1
Nickel	<0.10	mg/L	94	94	<0.10	<0.10	<1
Selenium	<0.10	mg/L	94	95	<0.10	<0.10	<1
Silver	<0.50	mg/L	97	93	<0.50	<0.50	<1
<b>Total</b>							
Arsenic	<1.00	mg/Kg	97	92	<1.00	<1.00	<1
Barium	<1.00	mg/Kg	102	105	27.6	29.3	6
Cadmium	<0.50	mg/Kg	102	107	3.67	3.54	4
Chromium	<1.00	mg/Kg	99	105	37.6	38.4	2
Lead	<1.00	mg/Kg	108	98	259	270	4
Mercury	<0.20	mg/Kg	101	97	<0.20	<0.20	<1
Selenium	<1.00	mg/Kg	91	104	<1.00	<1.00	<1
Silver	<2.00	mg/Kg	96	95	<2.00	<2.00	<1
Flashpoint	-	°F	101	-	>200	>200	<1
pH	-	su	101	-	11.61	11.60	<1

TCLP Extraction Method 1311

MDL: Method Detection Limit  
mg/L: Milligrams per Liter  
mg/Kg: Milligrams per Kilogram  
su: standard Units

Method Ref.: Methods for Chemical Analysis of Water and Wastes, EPA 600/4-79-020, Rev. March 1983  
Standard Methods for the Examination of Water and Wastewater, 18th Edition 1992  
SW - EPA Test Methods for the Examination of Solid Waste, Sw-846, 1996

Respectfully Submitted,

*[Signature]*  
Dr. Reddy Gadda  
Laboratory Director



Covel Gardens Landfill-  
Industrial Service Center  
8611 Covel Road  
San Antonio, TX 78252  
(210) 623-8800 / (210) 623-8780 Fax



Bill to Eagle Constr. & Envir. 528E

NON-HAZARDOUS MANIFEST

PO # 800395

GENERATOR: Camp Stanley  
MAILING ADDRESS: 25800 Ralph Fair Road  
CITY/ST: Boerne, TX 78015-4800  
PHONE: (210) 295-7449  
Attn: Brian Murphy

I.D. #: 69026  
SITE LOCATION: AOC-50  
ADDRESS: Same  
PHONE: Same

Description of Waste Materials	Approval #	Quantity	Units
Solidified Nickel Penetrant Residue & Soils From AOC-50	CG-16007	15	CY

I hereby certify that the above described materials are not hazardous wastes as defined by 40 CFR Part 261 and does not contain free liquids as defined by 40 CFR Part 260.10 or any applicable state law. Have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable regulations.

Brian Murphy  
Generator Authorized Agent Name (Print)

*Brian K. Murphy*  
Signature  
8/21/01  
Delivery Date

TRANSPORTER

TRANSP. NAME Eagle Construction + Envir.  
ADDRESS 419 Fm 1103  
CITY/ST.: C. Mills, TX

DRIVER NAME (Print): Sandang, David  
TRUCK NUMBER: 79  
PHONE #: (210) 655-9511

I hereby acknowledge receipt of the above described materials were received from the generator listed above and delivered to the disposal facility listed below without incident.

*[Signature]*  
Driver Signature  
8/21/01  
Shipment Date

*[Signature]*  
Driver Signature  
8/21/01  
Delivery Date

DISPOSAL FACILITY

SITE NAME: Covel Gardens Recycling and Disposal Facility  
ADDRESS: 8611 Covel Road, San Antonio, TX 78252

PHONE NUMBER: (210) 623-8800

I hereby acknowledge receipt of the above described materials.

Name of Authorized Agent (Print)

*[Signature]*  
Signature  
8/21/01  
Receipt Date

*D-Drum	C-Carton	B-Bag	P-Pounds	Y-Yards	O-Other
White-Original	Canary-Disposer Retain		Pink-Transporter Retain		Gold-Generator Retain

B02#607

Covel Gardens Landfill-  
Industrial Service Center  
311 Covel Road  
San Antonio, TX 78252  
(210) 623-8800 / (210) 623-8780 Fax



Bill to Eagle Constr. & Envir. 528E

Job # 04-11-5070 NON-HAZARDOUS MANIFEST P.O.# 8003195

GENERATOR: Camp Stanley  
MAILING ADDRESS: 25800 Ralph Fair Road  
CITY/ST: Boerne, TX 78015-4800  
PHONE: (210) 295-7449  
Attn: Brian Murphy

I.D. #: 69026  
SITE LOCATION: AOC-50  
ADDRESS: Same  
PHONE: Same

Description of Waste Materials	Approval #	Quantity	Units
Solidified Nickel Penetrant Residue & Soils From AOC-50	CG-16007	15	CY

I hereby certify that the above described materials are not hazardous wastes as defined by 40 CFR Part 261 and does not contain free liquids as defined by 40 CFR Part 260.10 or any applicable state law. Have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable regulations.

Brian Murphy  
Generator Authorized Agent Name (Print)

*Brian K. Murphy*  
Signature  
8/21/01  
Delivery Date

TRANSPORTER

TRANSP. NAME Eagle Construction & Envir.  
ADDRESS 414 E. M. 1103  
CITY/ST: Del Rio TX

DRIVER NAME (Print): Sandoval, David  
TRUCK NUMBER: 75  
PHONE #: (210) 366-4625

I hereby acknowledge receipt of the above described materials were received from the generator listed above and delivered to the disposal facility listed below without incident.

*[Signature]*  
Driver Signature  
8/21/01  
Shipment Date

*[Signature]*  
Driver Signature  
8/21/01  
Delivery Date

DISPOSAL FACILITY

SITE NAME: Covel Gardens Recycling and Disposal Facility  
ADDRESS: 8611 Covel Road, San Antonio, TX 78252.

PHONE NUMBER: (210) 623-8800

I hereby acknowledge receipt of the above described materials.

*[Signature]*  
Name of Authorized Agent (Print)

*[Signature]*  
Signature  
Receipt Date

Drum	C-Carton	B-Bag	P-Pounds	Y-Yards	O-Other
White-Original	Canary-Disposer Retain		Pink-Transporter Retain		Gold-Generator Retain

AOC 68 (Building 90-2)  
 Unvalidated Surface Soil Results  
 August 21, 2001  
 DO5068 736625-05000

D2216	Total Solids	MDL	RL	AOC68-SS01 (0.5-1')		Units	Flag
				Parvg	Concentration		
				=	84.1	%	
SW6010B	Barium	0.04	1.	=	268.	mg/kg	
	Chromium	0.39	100.	=	548.1	mg/kg	
	Copper	0.202	10.	=	247.26	mg/kg	
	Nickel	0.48	10.	=	129.1	mg/kg	
	Zinc	1.48	10.	=	1,811.8	mg/kg	
	Arsenic	0.495	5.	=	17.18	mg/kg	
SW7131A	Cadmium	18.92	100.	=	519.77	mg/kg	J
SW7421	Lead	71.32	500.	=	2,139.	mg/kg	J
SW7471A	Mercury	0.02	0.1	=	0.245	mg/kg	
SW8260B	Benzene	0.00002	0.002	<	0.00002	mg/kg	U
	Bromobenzene	0.00007	0.002	<	0.00007	mg/kg	U
	Bromochloromethane	0.00008	0.002	<	0.00008	mg/kg	U
	Bromodichloromethane	0.00005	0.004	<	0.00005	mg/kg	U
	Bromoform	0.00007	0.006	<	0.00007	mg/kg	U
	Bromomethane	0.00016	0.005	<	0.00016	mg/kg	U
	Butylbenzene, N-	0.00008	0.005	<	0.00008	mg/kg	U
	Butylbenzene, sec-	0.00004	0.007	<	0.00004	mg/kg	U
	Butylbenzene, tert-	0.00002	0.007	<	0.00002	mg/kg	U
	Carbon tetrachloride	0.00004	0.01	<	0.00004	mg/kg	U
	Chlorobenzene	0.00005	0.002	<	0.00005	mg/kg	U
	Chloroethane	0.00013	0.005	<	0.00013	mg/kg	U
	Chloroform	0.00002	0.002	<	0.00002	mg/kg	U
	Chlorohexane, 1-	0.00004	0.003	<	0.00004	mg/kg	U
	Chloromethane	0.00016	0.007	<	0.00016	mg/kg	U
	Chlorotoluene, 2-	0.00008	0.002	<	0.00008	mg/kg	U
	Chlorotoluene, 4-	0.00008	0.003	<	0.00008	mg/kg	U
	Dibromo-3-chloropropane, 1,2	0.0002	0.01	<	0.0002	mg/kg	U
	Dibromochloromethane	0.00004	0.003	<	0.00004	mg/kg	U
	Dibromomethane	0.0001	0.01	<	0.0001	mg/kg	U
	Dichlorobenzene, 1,2-	0.00007	0.002	<	0.00007	mg/kg	U
	Dichlorobenzene, 1,3-	0.00007	0.006	<	0.00007	mg/kg	U
	Dichlorobenzene, 1,4-	0.00004	0.002	<	0.00004	mg/kg	U
	Dichlorodifluoromethane	0.00008	0.005	<	0.00008	mg/kg	U
	Dichloroethane, 1,1-	0.00004	0.002	<	0.00004	mg/kg	U
	Dichloroethane, 1,2-	0.00005	0.003	<	0.00005	mg/kg	U
	Dichloroethane, 1,1-	0.00011	0.006	<	0.00011	mg/kg	U
	Dichloroethane, cis-1,2-	0.00011	0.006	<	0.00011	mg/kg	U
	Dichloroethane, trans-1,2-	0.00007	0.003	<	0.00007	mg/kg	U
	Dichloropropane, 1,2-	0.00003	0.002	<	0.00003	mg/kg	U
	Dichloropropane, 1,3-	0.00004	0.002	<	0.00004	mg/kg	U
	Dichloropropane, 2,2-	0.00003	0.02	<	0.00003	mg/kg	U
	Dichloropropene, 1,1-	0.00006	0.005	<	0.00006	mg/kg	U
	Dichloropropene, cis-1,3-	0.00004	0.005	<	0.00004	mg/kg	U
	Dichloropropene, trans-1,3-	0.00003	0.005	<	0.00003	mg/kg	U
	Ethylbenzene	0.00003	0.003	<	0.00003	mg/kg	U
	Ethylene dibromide	0.00007	0.003	<	0.00007	mg/kg	U
	Hexachlorobutadiene	0.00008	0.005	<	0.00008	mg/kg	U
	Isopropylbenzene	0.00002	0.008	<	0.00002	mg/kg	U
	Isopropyltoluene, 4- (Cymene)	0.00005	0.008	<	0.00005	mg/kg	U
	Methylene chloride	0.00032	0.005	TR	0.0008	mg/kg	F
	Naphthalene	0.00019	0.005	<	0.00019	mg/kg	U
Propylbenzene, N-	0.00003	0.002	<	0.00003	mg/kg	U	
Styrene	0.00004	0.0025	<	0.00004	mg/kg	U	
Tetrachloroethane, 1,1,1,2-	0.00007	0.003	<	0.00007	mg/kg	U	
Tetrachloroethane, 1,1,2,2-	0.0001	0.0025	<	0.0001	mg/kg	U	
Tetrachloroethene	0.00007	0.007	<	0.00007	mg/kg	U	
Toluene	0.00004	0.005	<	0.00004	mg/kg	U	
Trichlorobenzene, 1,2,3-	0.00018	0.002	<	0.00018	mg/kg	U	
Trichlorobenzene, 1,2,4-	0.00008	0.002	<	0.00008	mg/kg	U	
Trichloroethane, 1,1,1-	0.00004	0.004	<	0.00004	mg/kg	U	
Trichloroethane, 1,1,2-	0.00007	0.005	<	0.00007	mg/kg	U	
Trichloroethene	0.0001	0.01	<	0.0001	mg/kg	U	
Trichlorofluoromethane	0.00024	0.004	<	0.00024	mg/kg	U	
Trichloropropane, 1,2,3-	0.0001	0.02	<	0.0001	mg/kg	U	
Trimethylbenzene, 1,2,4-	0.00007	0.007	<	0.00007	mg/kg	U	
Trimethylbenzene, 1,3,5-	0.00012	0.003	<	0.00012	mg/kg	U	
Vinyl chloride	0.00018	0.009	<	0.00018	mg/kg	U	
Xylene (total)	0.00018	0.005	<	0.00018	mg/kg	U	
Xylene, m,p-	0.00018	0.007	<	0.00018	mg/kg	U	
Xylene, o-	0.00004	0.005	<	0.00004	mg/kg	U	
SW8330	Dinitrobenzene, 1,3-	0.008	0.25	<	0.008	mg/kg	U
	Dinitrotoluene, 2,4-	0.013	0.25	<	0.013	mg/kg	U
	Dinitrotoluene, 2,6-	0.019	0.28	<	0.019	mg/kg	U
	HMX	0.02	2.2	<	0.02	mg/kg	U
	Nitrobenzene	0.012	0.28	<	0.012	mg/kg	U
	Nitrotoluene, 2-	0.057	0.25	<	0.057	mg/kg	U
	Nitrotoluene, 3-	0.045	0.25	<	0.045	mg/kg	U
	Nitrotoluene, 4-	0.135	0.27	<	0.135	mg/kg	U
RDX	0.02	1.	<	0.02	mg/kg	U	
TETRYL	0.021	0.65	<	0.021	mg/kg	U	
Trinitrobenzene, 1,3,5-	0.01	0.25	<	0.01	mg/kg	U	
Trinitrotoluene, 2,4,6-	0.054	0.25	<	0.054	mg/kg	U	

**AOC 68 (Building 90-2)**  
**Unvalidated Surface Soil Results**  
**August 21, 2001**  
**DO5068 736625-05000**

		AOC68-SS03 (0.3-1)					Units	Flag
		MDL	RL	Parvg	Concentration			
D2216	Total Solids			=	92.9	%		
SW6010B	Barium	0.04	1.	=	32.	mg/kg		
	Chromium	0.08	20.	TR	16.7	mg/kg	F	
	Copper	0.04	2.	=	17.95	mg/kg		
	Nickel	0.096	2.	=	11.06	mg/kg		
	Zinc	0.3	2.	=	139.4	mg/kg		
SW7131A	Arsenic	0.049	0.5	=	3.27	mg/kg	J	
SW7131A	Cadmium	0.1892	1.	=	2.07	mg/kg		
SW7421	Lead	7.132	50.	=	391.4	mg/kg	J	
SW7471A	Mercury	0.02	0.1	<	0	mg/kg	U	
SW62606	Benzene	0.00002	0.002	<	0.00002	mg/kg	U	
	Bromobenzene	0.00007	0.002	<	0.00007	mg/kg	U	
	Bromochloromethane	0.00008	0.002	<	0.00008	mg/kg	U	
	Bromodichloromethane	0.00005	0.004	<	0.00005	mg/kg	U	
	Bromofom	0.00007	0.006	<	0.00007	mg/kg	U	
	Bromomethane	0.00016	0.005	<	0.00016	mg/kg	U	
	Butylbenzene, N-	0.00006	0.005	<	0.00006	mg/kg	U	
	Butylbenzene, sec-	0.00004	0.007	<	0.00004	mg/kg	U	
	Butylbenzene, tert-	0.00002	0.007	<	0.00002	mg/kg	U	
	Carbon tetrachloride	0.00004	0.01	<	0.00004	mg/kg	U	
	Chlorobenzene	0.00005	0.002	<	0.00005	mg/kg	U	
	Chloroethane	0.00013	0.005	<	0.00013	mg/kg	U	
	Chloroform	0.00002	0.002	<	0.00002	mg/kg	U	
	Chlorohexane, 1-	0.00004	0.003	<	0.00004	mg/kg	U	
	Chloromethane	0.00016	0.007	<	0.00016	mg/kg	U	
	Chlorotoluene, 2-	0.00008	0.002	<	0.00008	mg/kg	U	
	Chlorotoluene, 4-	0.00008	0.003	<	0.00008	mg/kg	U	
	Dibromo-3-chloropropane, 1,2	0.0002	0.01	<	0.0002	mg/kg	U	
	Dibromochloromethane	0.00004	0.003	<	0.00004	mg/kg	U	
	Dibromomethane	0.0001	0.01	<	0.0001	mg/kg	U	
	Dichlorobenzene, 1,2-	0.00007	0.002	<	0.00007	mg/kg	U	
	Dichlorobenzene, 1,3-	0.00007	0.006	<	0.00007	mg/kg	U	
	Dichlorobenzene, 1,4-	0.00004	0.002	<	0.00004	mg/kg	U	
	Dichlorodifluoromethane	0.00008	0.005	<	0.00008	mg/kg	U	
	Dichloroethane, 1,1-	0.00004	0.002	<	0.00004	mg/kg	U	
	Dichloroethane, 1,2-	0.00005	0.003	<	0.00005	mg/kg	U	
	Dichloroethane, 1,1-	0.00011	0.006	<	0.00011	mg/kg	U	
	Dichloroethane, cis-1,2-	0.00011	0.006	<	0.00011	mg/kg	U	
	Dichloroethane, trans-1,2-	0.00007	0.003	<	0.00007	mg/kg	U	
	Dichloropropane, 1,2-	0.00003	0.002	<	0.00003	mg/kg	U	
	Dichloropropane, 1,3-	0.00004	0.002	<	0.00004	mg/kg	U	
	Dichloropropane, 2,2-	0.00003	0.02	<	0.00003	mg/kg	U	
	Dichloropropene, 1,1-	0.00006	0.005	<	0.00006	mg/kg	U	
	Dichloropropene, cis-1,3-	0.00004	0.005	<	0.00004	mg/kg	U	
	Dichloropropene, trans-1,3-	0.00003	0.005	<	0.00003	mg/kg	U	
	Ethylbenzene	0.00003	0.003	<	0.00003	mg/kg	U	
	Ethylene dibromide	0.00007	0.003	<	0.00007	mg/kg	U	
	Hexachlorobutadiene	0.00006	0.005	<	0.00006	mg/kg	U	
	Isopropylbenzene	0.00002	0.008	<	0.00002	mg/kg	U	
	Isopropyltoluene, 4- (Cymene)	0.00005	0.006	<	0.00005	mg/kg	U	
	Methylene chloride	0.00032	0.005	TR	0.0006	mg/kg	U	
Naphthalene	0.00019	0.005	<	0.00019	mg/kg	F		
Propylbenzene, N-	0.00003	0.002	<	0.00003	mg/kg	U		
Styrene	0.00004	0.0025	<	0.00004	mg/kg	U		
Tetrachloroethane, 1,1,1,2-	0.00007	0.003	<	0.00007	mg/kg	U		
Tetrachloroethane, 1,1,2,2-	0.0001	0.0025	<	0.0001	mg/kg	U		
Tetrachloroethene	0.00007	0.007	<	0.00007	mg/kg	U		
Toluene	0.00004	0.005	TR	0.0008	mg/kg	F		
Trichlorobenzene, 1,2,3-	0.00016	0.002	<	0.00016	mg/kg	U		
Trichlorobenzene, 1,2,4-	0.00008	0.002	<	0.00008	mg/kg	U		
Trichloroethane, 1,1,1-	0.00004	0.004	<	0.00004	mg/kg	U		
Trichloroethane, 1,1,2-	0.00007	0.005	<	0.00007	mg/kg	U		
Trichloroethene	0.0001	0.01	TR	0.001	mg/kg	F		
Trichlorofluoromethane	0.00024	0.004	<	0.00024	mg/kg	U		
Trichloropropane, 1,2,3-	0.0001	0.02	<	0.0001	mg/kg	U		
Trimethylbenzene, 1,2,4-	0.00007	0.007	<	0.00007	mg/kg	U		
Trimethylbenzene, 1,3,5-	0.00012	0.003	<	0.00012	mg/kg	U		
Vinyl chloride	0.00018	0.009	<	0.00018	mg/kg	U		
Xylene (total)	0.00018	0.005	<	0.00018	mg/kg	U		
Xylene, m,p-	0.00018	0.007	<	0.00018	mg/kg	U		
Xylene, o-	0.00004	0.005	<	0.00004	mg/kg	U		
SW6330	Dinitrobenzene, 1,3-	0.008	0.25	<	0.008	mg/kg	U	
	Dinitrotoluene, 2,4-	0.013	0.25	<	0.013	mg/kg	U	
	Dinitrotoluene, 2,6-	0.019	0.26	<	0.019	mg/kg	U	
	HNX	0.02	2.2	<	0.02	mg/kg	U	
	Nitrobenzene	0.012	0.26	<	0.012	mg/kg	U	
	Nitrotoluene, 2-	0.057	0.25	<	0.057	mg/kg	U	
	Nitrotoluene, 3-	0.045	0.25	<	0.045	mg/kg	U	
	Nitrotoluene, 4-	0.135	0.27	<	0.135	mg/kg	U	
	RDX	0.02	1.	<	0.02	mg/kg	U	
	TETRYL	0.021	0.65	<	0.021	mg/kg	U	
Trinitrobenzene, 1,3,5-	0.01	0.25	<	0.01	mg/kg	U		
Trinitrotoluene, 2,4,6-	0.054	0.25	<	0.054	mg/kg	U		

Violation No. 5  
and AOC A

- NOR Modification Documentation: Waste Stream Notification Form and Associated Cover Letter

cc: Brian



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

November 2, 2001

Waste Evaluation Section, MC 129  
Industrial and Hazardous Waste Division  
Texas Natural Resource Conservation Commission  
P.O. Box 13087  
Austin, Texas 78711-3087

Subject: Camp Stanley Storage Activity  
EPA identification number TX2210020739  
Solid waste registration number 69026

Dear Mr. Nelson:

Camp Stanley Storage Activity (CSSA) would like to make the following changes to their notice of registration (NOR) to reflect current waste management practices. Please add waste stream 4022 609 H and 4023 489 H as in the attached TNRCC Forms 0002A.

Please inactivate the following waste codes that CSSA does not plan to generate in the future:

- 4001 103 H      4002 109 H      4008 319 H      4009 319 H      4012 489 H
- 4017 103 H      4019 219 H      4020 319 H      4021 209 H

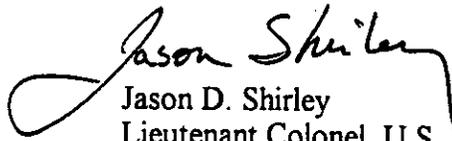
Several waste management units should have their status updated in the CSSA NOR as follows:

<i>TNRC C Unit</i>	<i>Unit Name</i>	<i>Current Status</i>	<i>Previous Documentation</i>
001	F-14 CSA	Closed	Sent closure certification report on 21 Apr 95; received TNRCC acknowledgement by letter of 2 Nov 95; CSSA letter of 12 Dec 97.
002	Bldg 40 CSA	Closure pending	Sent notice of closure activities on 17 Dec 96; received acknowledgement from TNRCC 13 Jan 97.
004	Oxidation pond	Inactive	Undergoing remedial action - not a current waste management unit; CSSA letter of 12 Dec 97 and CSSA letter of 18 May 99.
005	B-20 OB/OD area	Inactive	Undergoing remedial action - not a current waste management unit; CSSA letter of 12 Dec 97 and CSSA letter of 18 May 99.

Waste Evaluation Section  
November 2, 2001  
Page 2

If you have any questions or comments please contact me at 210/295-7416.

Sincerely,

  
Jason D. Shirley  
Lieutenant Colonel, U.S. Army  
Commanding Officer

Cc: TNRCC District 13

Enclosures

# HAZARDOUS OR INDUSTRIAL WASTE STREAM NOTIFICATION FORM (TNRCC-0002A)

COMPANY NAME: Camp Stanley Storage Activity

TEXAS SOLID WASTE REGISTRATION NUMBER: 6 9 0 2 6

EPA ID NUMBER: T X 2 2 1 0 0 2 0 7 3 9

GENERATING SITE LOCATION: 25800 Ralph Fair Roadn Boerne 78015-4800  
(address) (city) (zip)

Texas Waste Code:

1. Sequence Number + 2. Form Code + 3. Classification\* = Texas Waste Code

\* If this is a Class 3 waste, you must attach copies of all information, documentation, and rationale you used in classifying this waste.

4. Waste Stream Information: Provide the following.

Waste Description: Petroleum contaminated solids  
(resid from ordnance maintenance operations - replaces 4012489H)

Generating Process: cleaning operations

Initial Date of Generation: prior to 11 July 01

5. Origin Codes:

Primary Origin Code:

Other Applicable Origin Codes:  ,

Choose from the following codes:

CODE	DESCRIPTION
1	The waste was generated on-site from a product process or service activity.
2	The waste was the result of a spill clean-up, equipment decommissioning, or emergency removal by company.
3	The waste was derived from the on-site management of a nonhazardous waste.
4*	The waste was received from off-site and was not recycled or treated on-site.
5	The waste was a residual from the on-site treatment, disposal or recycling of previously existing hazardous waste.
6*	The waste was from a state, federal, or locally funded cleanup.
7*	The waste was from a corrective action or closure.

\* Use alone if 4, 6, or 7 is used as Primary Origin Code. May not be combined with any other code.

**6. Waste Management Location:**

Answer both questions:

a. Is this waste shipped or managed off-site?

Yes       No

b. Is this waste stored or otherwise managed on-site?

Yes       No

Notice of Registration (NOR) Unit Sequence Number if unit is already on NOR. If unit is new, include waste code on unit form TNRCC-0002B:

0 0 3, \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. **New Chemical Substance:** Is this a Class 2 or Class 3 waste generated from the production of a new chemical substance?

Yes       No

If YES, you must attach copies of all information, documentation and rationale you used to classify this waste.

8. **Company Waste ID:** (Optional) \_\_\_\_\_

9. **Is this Waste Recycled?**

Yes       No

If you answered "Yes", please supply the following:

A. Describe how the material will be recycled.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Describe the purpose/function the material serves in the recycling activity.

---

---

---

C. Is the material recycled  on-site or  off-site. (If both, check both.)

**QUESTIONS 10 - 15 PERTAIN TO HAZARDOUS WASTE ONLY**  
**If this waste is nonhazardous, go to last page and sign**

10. EPA Hazardous Waste Numbers: (EPA Code)

D	C	C	1								

(Continue on a separate page if necessary.)

11. SIC Codes:

(See *instructions* for a partial list of SICs.)

Primary SIC Code: 

9	7	1	1
---	---	---	---

Other Applicable SIC Codes:

				,					,				
--	--	--	--	---	--	--	--	--	---	--	--	--	--

(Continue on separate page if necessary)

12. Source Codes:

(See *instructions* for a list of Source Codes.)

Primary Source Code: A 

2	9
---	---

Other Applicable Codes: A 

--	--

, A 

--	--

, A 

--	--

(Continue on separate page if necessary)

13. Mixed Radioactive Waste:

Yes  No

14. Measurement Points for Determining the Quantity of the Waste to Be Reported on the Annual Report:

(See instructions for a list of Measurement Point Codes)

Primary Measurement Point Code:

Other Applicable Codes: ,

15. System Types: Answer this ONLY if you selected #5 as the Primary Origin Code in response to Question 5.

(See instructions for a list of System Type Codes.)

Primary System Type M

Other Applicable Codes: M , M , M

(Continue on separate page if necessary)

I certify that the information here is complete and accurate to the best of my knowledge:

Jason Shirley  
Signature  
LTC. Jason D. Shirley  
Print Name

5 Nov 01  
Date

Preparer's Telephone Number:

210 - 295 - 7416

Please return completed form (and any attachments) to:

Texas Natural Resource Conservation Commission  
Industrial and Hazardous Waste Division  
Waste Evaluation Section, MC-129  
Post Office Box 13087  
Austin, Texas 78711-3087

# HAZARDOUS OR INDUSTRIAL WASTE STREAM NOTIFICATION FORM (TNRCC-0002A)

COMPANY NAME: Camp Stanley Storage Activity

TEXAS SOLID WASTE REGISTRATION NUMBER: 6 9 0 2 6

EPA ID NUMBER: 7 X 2 2 1 0 0 2 0 7 9 9

GENERATING SITE LOCATION: 25800 Ralph Fair Rd Boerne 78015-4800  
(address) (city) (zip)

Texas Waste Code:

1. Sequence Number + 2. Form Code + 3. Classification\* = Texas Waste Code

\* If this is a Class 3 waste, you must attach copies of all information, documentation, and rationale you used in classifying this waste.

4. Waste Stream Information: Provide the following.

Waste Description: Spent solvent prior to recycling

(replaces waste code 4011609H)

Generating Process: cleaning operations

Initial Date of Generation: prior to 11 July 01

5. Origin Codes:

Primary Origin Code:

Other Applicable Origin Codes:  ,

Choose from the following codes:

CODE	DESCRIPTION
1	The waste was generated on-site from a product process or service activity.
2	The waste was the result of a spill clean-up, equipment decommissioning, or emergency removal by company.
3	The waste was derived from the on-site management of a nonhazardous waste.
4*	The waste was received from off-site and was not recycled or treated on-site.
5	The waste was a residual from the on-site treatment, disposal or recycling of previously existing hazardous waste.
6*	The waste was from a state, federal, or locally funded cleanup.
7*	The waste was from a corrective action or closure.

\* Use alone if 4, 6, or 7 is used as Primary Origin Code. May not be combined with any other code.

**6. Waste Management Location:**

Answer both questions:

a. Is this waste shipped or managed off-site?

Yes       No

b. Is this waste stored or otherwise managed on-site?

Yes       No

Notice of Registration (NOR) Unit Sequence Number if unit is already on NOR. If unit is new, include waste code on unit form TNRCC-0002B:

0 0 3, \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. **New Chemical Substance:** Is this a Class 2 or Class 3 waste generated from the production of a new chemical substance?

Yes       No

**If YES, you must attach copies of all information, documentation and rationale you used to classify this waste.**

8. **Company Waste ID:** (Optional) \_\_\_\_\_

9. **Is this Waste Recycled?**

Yes       No

If you answered "Yes", please supply the following:

A. Describe how the material will be recycled.

Spent solvent will be distilled and recovered.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Describe the purpose/function the material serves in the recycling activity.

The spent solvent is recovered during distillation  
and reused in the generating process.

C. Is the material recycled  on-site or  off-site. (If both, check both.)

**QUESTIONS 10 - 15 PERTAIN TO HAZARDOUS WASTE ONLY**  
**If this waste is nonhazardous, go to last page and sign**

10. EPA Hazardous Waste Numbers: (EPA Code)

D001	D007	D008	D009		

(Continue on a separate page if necessary.)

11. SIC Codes:

(See instructions for a partial list of SICs.)

Primary SIC Code: 9711

Other Applicable SIC Codes:

, ,

(Continue on separate page if necessary)

12. Source Codes:

(See instructions for a list of Source Codes.)

Primary Source Code: A 05

Other Applicable Codes: A , A , A

(Continue on separate page if necessary)

13. Mixed Radioactive Waste:

Yes  No

14. Measurement Points for Determining the Quantity of the Waste to Be Reported on the Annual Report:

(See instructions for a list of Measurement Point Codes)

Primary Measurement Point Code:

Other Applicable Codes:  ,

15. System Types: Answer this ONLY if you selected #5 as the Primary Origin Code in response to Question 5.

(See instructions for a list of System Type Codes.)

Primary System Type M

Other Applicable Codes: M    , M    , M     
(Continue on separate page if necessary)

I certify that the information here is complete and accurate to the best of my knowledge:

Jason Shirley  
Signature  
LTC. Jason D. Shirley  
Print Name

5 Nov 01  
Date

Preparer's Telephone Number:

-    -

Please return completed form (and any attachments) to:

Texas Natural Resource Conservation Commission  
Industrial and Hazardous Waste Division  
Waste Evaluation Section, MC-129  
Post Office Box 13087  
Austin, Texas 78711-3087

Violation No. 6

- Annual waste summary report for 1998

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
ANNUAL WASTE SUMMARY

SWR #: 69026



02\26\1999 3:14:02 PM

Texas Waste Code	Quantity	Unit of Measure	EPA Haz. Waste Num.	STC	Facility ID	Facility EPA ID	Record Status
10013111	36000.00	P		132	H2093		TRANS-02\26\1
10052961	328.00	P		134	32299	TXD000719518	TRANS-02\26\1
10063101	298.00	P		112	32299	TXD000719518	TRANS-02\26\1
10084091	290.00	P		141	50267	TXD055135388	TRANS-02\26\1
10094891	103.00	P		112	32299	TXD000719518	TRANS-02\26\1
10133021	3600.00	P		141	H2093		TRANS-02\26\1
10143191	1063.00	P		125	32299	TXD000719518	TRANS-02\26\1
4002109H	927.00	P	D002	134	32299	TXD000719518	TRANS-02\26\1
DSJ5105H	406.00	P	D007	132	50052	TXD069452340	TRANS-02\26\1

## Violation No. 7

- IDW Memorandums from TNRCC and Parsons Engineering Science
- SWMU O-1 - TCLP analytical summary, waste profile, sampling location map, waste characterization profile, and Waste Management Inc. correspondence
- Well installations - IDW Characterization Summary, MW-10 Discrete Interval Analytical Summary
- Rented GAC unit composite sample results, spent carbon characterization summary, laboratory reports of analyses, and Carbtrol, Inc. correspondence

C

C

C

1

2

3

C

C

C

C

C

C

C

C

C

1

2

3

C

C

C

