

69026



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

12 December 1997

Office of the Commander

Ms. Marie Kelly
Data Analysis & Management Team
Industrial & Hazardous Waste Division, MC129
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

Subject: Camp Stanley Storage Activity,
Solid Waste Registration Number 69026,
EPA ID Number TX2210020739,
Changes to NOR

Dear Ms. Kelly,

Camp Stanley Storage Activity requests that the following data be modified on its NOR. Some of the inaccurate information was noted during a Compliance Evaluation Inspection on 6 August 1997. The corrections are as follows:

- Company name should read, **Camp Stanley Storage Activity, U. S. Army.**
- Contact should read, **LTC Ernest N. Roberson, Jr.** vice Dean C. Schmelling.
- County should read, **Bexar** vice Kendall and the correct county number.
- Phone should read, **(210) 295-7416**, vice (512) 224-7416.
- Mailing address zip code should read **78015-4800** vice 78006-4800.
- Site street address zip code should read **78015-4800** vice 78006-4800.

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JL
MK

- Texas waste code **4001103H** should be amended to include EPA waste codes **D006, D007, and D008**.
- Texas waste code **4004202H** should be made inactive. This waste stream is no longer generated. The tetrachloroethylene process was replaced with a citrus-based cleaner. This waste is reflected under 101221911
- Texas waste code **4005209H** should be amended to include EPA waste codes **D001, F003, and F005**. These additional waste codes were not added when our NOR was updated in January 1996.
- Texas waste code **4011609H** should be amended to include EPA waste codes **D007, D008, and D009**. These additional waste codes were not added when our NOR was updated in January 1996.
- Texas waste code **990001** should be made inactive. This waste code was modified to fit the new waste code system in January 1996.
- Texas waste code **990002** should be made inactive. This waste code was modified to fit the new waste code system in January 1996.
- Texas waste code **993210** should be made inactive. This waste code was modified to fit the new waste code system in January 1996.

There has been no waste generation under waste codes **990001, 990002, or 993210** since the change over to the new eight digit system enacted in January 1996.

There has been no generation of waste under code **4004202H** in 1997, and none are anticipated in the future.

The following waste management units need to be added to our NOR, since they could possibly have received wastes after the regulatory deadline in 1980.

- Waste management unit **F-14**, less than 90-day storage area. This site underwent investigation and closure procedures per TNRCC regulations. On November 2, 1995 Camp Stanley received a final report for closure from TNRCC, Closure Team,

Corrective Action Section, Industrial & Hazardous Waste Division. Therefore, it should be noted that this site was closed. New waste management unit 003.

- Solid waste management unit number **O-1**. An oxidation pond constructed in 1975. Waste liquids and sludges were collected and placed in the this evaporation pond. A site investigation is underway. New waste management unit 004.
- Solid waste management unit number **B-20**. A former open burn/open detonation area. The site was used until 1987. Currently undergoing closure through the TNRCC. New waste management unit 005.

Attached are the necessary TNRCC-0002B Forms for each site being added to our NOR.

Should there be any questions regarding this correspondence please contact me or Mr. Brian K. Murphy, CSP, Environmental Officer at (210) 295-7416 and (210) 698-5208, respectively.

Sincerely,


ERNEST N. ROBERSON, JR.
LTC, U.S. Army
Commanding Officer

Attachments

cc: Greg Lyssy, US EPA, Region 6
Richard Clarke, TNRCC, Corrective Action Section, I&HW
Malcomb Ferris, TNRCC Region 13, San Antonio

NEW WASTE MANAGEMENT UNIT FORM

Page 1

TNRCC Solid Waste Registration Number: 6 9 0 2 6 EPA ID T X 2 2 1 0 0 2 0 7 3 9

COMPANY NAME: Camp Stanley Storage Activity, US Army

GENERATING SITE LOCATION: 25800 Ralph Fair Road, Boerne, Texas 78015-4800

1. Unit Sequence Number. 0 0 3

2. Unit Type. 1 4

3. Capacity. (required for RCRA permitted or interim status units) _____

4. Unit Description. F-14, less than 90-day storage area. Closed by TNRCC November 2, 1995.
Unit was a storage area for hazardous and non-hazardous wastes.

5. Permit Number for this Unit. Go on to Question 6 if this unit is not currently permitted.

a. Unit Number on Hazardous or Industrial Waste Permit. _____

b. Unit Number on Underground Injection Control Permit. _____

6a. Unit Regulatory Status. Check ONE box.

- 1. RCRA Permitted: active inactive not yet built under construction
- 2. RCRA Interim Status Unit: active inactive not yet built under construction
- 3. RCRA Permit Exempt--Accumulation Time
- 4. UIC Permitted
- 5. Nonhazardous industrial waste management only
- 6. Other
- 7. Unknown
- 8. RCRA Permit Exempt--Waste water treatment unit
- 9. RCRA Permit Exempt--Totally enclosed treatment
- 10. RCRA Permit Exempt--Other
- 11. RCRA Permit Exempt--Recycling Unit per 30 TAC 335.24
- 12. Permitted Nonhazardous Waste Unit

6b. Biennial System Regulatory Status. The EPA requires a different code for System Regulatory Status for the Biennial Report. Select the appropriate regulatory status code for the system to which the unit belongs.

- 01 RCRA regulated; all units are subject to RCRA permitting standards.
- 02 Not RCRA regulated; no units are subject to RCRA permitting standards but discharge is subject to NPDES permitting standards.
- 03 Not RCRA regulated; no units are subject to RCRA permitting standards and discharge is subject to POTW permit/approval.
- 04 Not RCRA regulated; no units are subject to RCRA permitting standards and underground injection process is subject to UIC permitting standards.

TNRCC Solid Waste Registration Number: 6 9 0 2 6 EPA ID T X 2 2 1 0 0 2 0 7 3 9

COMPANY NAME: Camp Stanley Storage Activity, US Army

- 05 Both RCRA regulated and RCRA exempt units and discharge are subject to NPDES permitting standards (can only occur in multiple process system).
- 06 Both RCRA regulated and RCRA exempt units and discharge are subject to POTW permit/approval (can only occur in multiple process system).
- 07 Both RCRA regulated and RCRA exempt units and the process system are subject to UIC permitting standards.
- 08 All units are exempt from Federal and State permitting requirements.
- 09 Regulated only by Texas for hazardous waste activities.
- 10 Regulatory status unknown.
- 11 Other regulatory status which includes nonhazardous waste activities (specify in description).

7. Classification of Waste from Off Site Managed In Unit.

Does this unit manage waste from off site? Yes No If you answered NO, then go on to Question 8. If you answered YES, then check as many as apply from the list below.

- Hazardous
- Class 1 Nonhazardous Industrial
- Class 2 Nonhazardous Industrial
- Class 3 Nonhazardous Industrial
- Non-Industrial or Municipal Solid Waste from nonindustrial sources

8. System Type of Unit.

M 1 4 1 M _____ M _____ M _____

9. Wastes Generated On site and Managed In Unit.

List the 8-character Texas waste codes for applicable on site waste streams. Always start writing the waste code in the left most box.

Example:

0	0	0	1	2	0	3	H
---	---	---	---	---	---	---	---

Signature *Ernest N. Roberson, Jr.* LTC Ernest N. Roberson, Jr. Date 12 DEC 97

Telephone number: (210) 295-7416

Return this form to: TNRCC, Industrial and Hazardous Waste Division, Waste Evaluation Section, MC 129, P.O. Box 13087, Austin, Texas, 78711-3087

NEW WASTE MANAGEMENT UNIT FORM

Page 3

TNRCC Solid Waste Registration Number: 6 9 0 2 6 EPA ID T X 2 2 1 0 0 2 0 7 3 9

COMPANY NAME: Camp Stanley Storage Activity, US Army

GENERATING SITE LOCATION: 25800 Ralph Fair Road, Boerne, Texas 78015-4800

1. Unit Sequence Number. 0 0 4

2. Unit Type. 0 1

3. Capacity. (required for RCRA permitted or interim status units) _____

4. Unit Description. SWMU 0-1, a former evaporation pond. Constructed in 1975. Unit is currently under investigation.

5. Permit Number for this Unit. Go on to Question 6 if this unit is not currently permitted.

a. Unit Number on Hazardous or Industrial Waste Permit. _____

b. Unit Number on Underground Injection Control Permit. _____

6a. Unit Regulatory Status. Check ONE box.

- 1. RCRA Permitted: active inactive not yet built under construction
- 2. RCRA Interim Status Unit: active inactive not yet built under construction
- 3. RCRA Permit Exempt--Accumulation Time
- 4. UIC Permitted
- 5. Nonhazardous industrial waste management only
- 6. Other
- 7. Unknown
- 8. RCRA Permit Exempt--Waste water treatment unit
- 9. RCRA Permit Exempt--Totally enclosed treatment
- 10. RCRA Permit Exempt--Other
- 11. RCRA Permit Exempt--Recycling Unit per 30 TAC 335.24
- 12. Permitted Nonhazardous Waste Unit

6b. Biennial System Regulatory Status. The EPA requires a different code for System Regulatory Status for the Biennial Report. Select the appropriate regulatory status code for the system to which the unit belongs.

- 01 RCRA regulated; all units are subject to RCRA permitting standards.
- 02 Not RCRA regulated; no units are subject to RCRA permitting standards but discharge is subject to NPDES permitting standards.
- 03 Not RCRA regulated; no units are subject to RCRA permitting standards and discharge is subject to POTW permit/approval.
- 04 Not RCRA regulated; no units are subject to RCRA permitting standards and underground injection process is subject to UIC permitting standards.

TNRCC Solid Waste Registration Number: 6 9 0 2 6 EPA ID T X 2 2 1 0 0 2 0 7 3 9

COMPANY NAME: Camp Stanley Storage Activity, US Army

- 05 Both RCRA regulated and RCRA exempt units and discharge are subject to NPDES permitting standards (can only occur in multiple process system).
- 06 Both RCRA regulated and RCRA exempt units and discharge are subject to POTW permit/approval (can only occur in multiple process system).
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8. System Type of Unit.

M _____ M _____ M _____ M _____

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List the 8-character Texas waste codes for applicable on site waste streams. Always start writing the waste code in the left most box.

Example:

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Signature LTC Ernest N. Roberson, Jr.

Date 12 DEC 97

Telephone number: (210) 295-7416

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NEW WASTE MANAGEMENT UNIT FORM

Page 5

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COMPANY NAME: Camp Stanley Storage Activity, US Army

GENERATING SITE LOCATION: 25800 Ralph Fair Road, Boerne, Texas 78015-4800

1. Unit Sequence Number. 0 0 5

2. Unit Type. 0 8

3. Capacity. (required for RCRA permitted or interim status units) _____

4. Unit Description. SWMU B-20, a former open burn/open detonation area. Unit is currently undergoing closure activities. US EPA Region 6 has CACO with facility.

5. Permit Number for this Unit. Go on to Question 6 if this unit is not currently permitted.

a. Unit Number on Hazardous or Industrial Waste Permit. _____

b. Unit Number on Underground Injection Control Permit. _____

6a. Unit Regulatory Status. Check ONE box.

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Signature LTC Ernest N. Roberson, Jr.

Date 12 DEC 97

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