

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



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 21, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED Z 742 988 710

Lt. Colonel Ernest N. Roberson, Jr.
Commanding Officer
Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, Texas 78015-4800

Re: Compliance Evaluation Inspection of August 6, 1997
TNRCC Industrial Solid Waste Reg. No. 69026
EPA ID No. TX2210020739
Bexar County

Dear Lt. Col. Roberson:

On August 6, 1997, Mr. Malcolm A. Ferris of the Texas Natural Resource Conservation Commission (TNRCC) San Antonio Region conducted an inspection of the above-named facility. The inspection was conducted to determine the facility's compliance with applicable laws and regulations pertaining to industrial solid waste management. During the inspection the investigator verbally notified you and Mr. Brian K. Murphy (Environmental Officer) of concerns which were potential non-compliances and following the inspection, Mr. Murphy was verbally notified of a concern which was a non-compliance (see attachment). The non-compliance issue was adequately resolved on August 20, 1997. The non-compliance and the areas of concern have been included in the attachment to this letter. Your response to the San Antonio Region's concerns is requested within thirty (30) days of the receipt of this letter.

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The Commission appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you have any questions regarding these matters, please contact Malcolm A. Ferris at (210)490-3096, extension 312.

Sincerely,

Craig E. Mappan

for Henry Karnei, Jr.
Waste Program Manager, San Antonio Region 13

HK/maf

Attachments

cc: Mr. Gregory Lyssy, U.S. EPA Region 6, Hazardous Waste Management Division, Superfund Branch, 1445 Ross Avenue, Dallas, TX 75202

Chief, Texas Section (6EN-HT), RCRA Enforcement Branch, Compliance Assurance and Enforcement Division, U.S. EPA, Region 6, 1445 Ross Avenue, Dallas, TX 75202-2733

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**SUMMARY OF VIOLATIONS
CAMP STANLEY STORAGE ACTIVITY (CSSA)
COMPLIANCE EVALUATION INSPECTION (CEI) OF AUGUST 6, 1997**

VIOLATIONS ALLEGED AND RESOLVED DURING CURRENT INSPECTION

1. 30 Texas Administrative Code (TAC) §335.62 & 335.504(2) / 40 Code of Federal Regulations (CFR) §262.11(b) - Hazardous waste determination.

A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

- (a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.
- (b) He must then determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261.

During the site inspection conducted on August 6, 1997, two (2) 30-gallon containers of "lacquer thinner" was observed to be held in Building 86 (Notice of Registration unit #002). These containers were not labeled with the words "hazardous waste" but they were marked as non-hazardous waste pending receipt of analytical results for a sample of the waste collected on August 5, 1997. Discussions with Mr. Brian Murphy and subsequent review of the Notice of Registration (NOR) indicated that the lacquer thinner was listed as a Class 2 industrial solid waste (NOR waste code 20092092). Following further review of the lacquer thinner product which generated this waste stream, it was found that the material safety data sheet (MSDS) for the original product identified acetone, methyl ethyl ketone and toluene to each be present in concentrations exceeding 10 per cent. Based upon the information available on the MSDS, it is believed that the facility operators should have recognized the lacquer thinner waste stream as a listed hazardous waste from non-specific sources (F003 and F005) and the management of that waste stream should have been as a hazardous waste prior to receipt of analytical results for the sample of the waste.

Following verbal notification on August 20, 1997 of this potential violation, Mr. Murphy provided copies of the MSDS for the lacquer thinner product (Crown Lacquer Thinner) and a copy of the waste stream notification record completed on August 20, 1997. Based upon this submittal, the alleged violation has been resolved. In order to satisfy the concerns of the San Antonio Region regarding the past management of waste generated by the use of this lacquer thinner product, CSSA is requested to provide copies of previous waste determination documentation for this waste stream and for the Class 2 waste stream listed on the facility's NOR as 20092092. This documentation should include the applicable items required under 30 TAC §335.513 (relating to Documentation Required) and any other documentation which supports the waste determination. In addition, the previous disposal information

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for the lacquer thinner (under either waste code) is also requested, and this should include copies of manifests and annual waste records for this waste stream as required under 30 TAC §335.9 (relating to Record Keeping and Annual Reporting Procedures Applicable to Generators).

AREAS OF CONCERN

- A. During this inspection several concerns have been raised regarding the facility's registrations with the TNRCC and the EPA. It is noted that the county location in both registration databases is identified as Kendall County but that CSSA is actually located in Bexar County. In the TNRCC database this was found to have been changed sometime since 1995, but Mr. Murphy indicated that he had not requested this change. The TNRCC registration also identifies the previous Commanding Officer for CSSA, (Lt. Col.) Dean Schmelling, as the facility contact. The EPA internal notifiers report (INR) also identifies the old CSSA address (P.O. Box 690627, San Antonio, 78269). The facility operators are requested to correct this information by written correspondence from CSSA to the TNRCC Waste Evaluation Section (or through STEERS, as appropriate) with copies to be sent to the San Antonio Region to show that the changes have been made.

The Notice of Registration (NOR) maintained by CSSA with the TNRCC was also found to not include solid waste management units (SWMUs) which were identified during this inspection as being closed or inactive and prepared for final closure. Records maintained by Mr. Murphy indicated that CSSA had previously submitted notification to the TNRCC for this unit, identified as Building 40 (NOR unit #001). The notification form was reportedly sent by CSSA to the TNRCC Waste Evaluation Section on January 26, 1995. A copy of this form and the cover letter reportedly used to transmit the form were provided during this inspection. It was also noted that another SWMU ("F-14" 90-day accumulation site) had been closed in April 1995 and neither does that unit appear on the NOR for CSSA. With regard to the 19 SWMUs which have been identified for closure and the former open burning / open detonation unit (B-20), these were also noted to not be included on the NOR. Mr. Murphy considered these units to not be subject to the notification requirements because these units no longer receive solid wastes; however, the investigator indicated that any SWMU which had received solid waste after the notification requirement regulations had been finalized would have been required to be included on the NOR at that time. Therefore, CSSA is requested to provide a review of the SWMU's which were receiving waste at the time of the initial facility registration notification on January 24, 1983 or afterwards, and to update the NOR so as to be in compliance with the requirements that existed at that time.

The type of waste generated (i.e., industrial vs. non-industrial) by the activities at CSSA was

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noted to be unusual. It has been noted in this inspection that the mission of CSSA is not as a manufacturing facility, but rather as a support facility for storage, testing and maintenance of military munitions. The only manufacturing activities have been noted to be minor parts fabrication incidental to and in support of the maintenance and repair of small weapons. When Mr. Murphy was asked about the waste generator type classification, he indicated that the issue had not been questioned by the facility operators. It is noted that the operation of CSSA under the industrial generator type classification is well ordered and has simplified much of the recent waste management activities at the facility which have involved one-time shipments of wastes generated in the general clean-up and organization of the facility following the issuance of the Consent Agreement and Consent Order by the EPA. Although the San Antonio Region is satisfied with the current operation of the site as an industrial generator, it is recognized that CSSA may re-evaluate this status. If the facility operators should decide to change the generator type status, the San Antonio Region requests that CSSA contact the Region to provide documentation of the rationale for the change in status.

- B. In addition to the above noted concerns, the quantity of waste generated by CSSA's solid waste management unit (SWMU) closure activities raises another concern regarding the compliance of CSSA with the notification and accumulation time requirements. It was noted that the scrap metal and soils observed to be stockpiled at the SWMU clean-up areas were not considered by Mr. Murphy to be "generated" waste, and that the quantity of the waste which has been or would be generated from these areas was not being considered to be applicable to the hazardous waste generator status for the CSSA facility site. The concerns of the San Antonio Region are that since the material stockpiled (on plastic or otherwise) is intended for disposal, then they are solid waste and, therefore, CSSA needs to perform a hazardous waste determination on those materials. If the waste is determined to exhibit a characteristic of a hazardous waste, then CSSA needs to manage those materials in compliance with accumulation time requirements. As a result of these concerns, CSSA is requested to provide a written response to address the on-site management of scrap metal and contaminated soils generated by the remediation activities, and which explains when materials are to be considered solid waste and how the management of the materials is to comply with the applicable notification and accumulation time requirements. In particular, if the materials stockpiled at B-20 and B-24 are not considered to be solid waste, then CSSA is requested to provide a written explanation of how the management of those materials is to be in compliance with the Texas Water Code's prohibitions on unauthorized discharges.

With regard to the expressed intention of the facility operators to dispose of the scrap metal and soils observed stockpiled at B-20 as a non-hazardous waste following on-site stabilization of metals, the San Antonio Region notes that the treatment of a hazardous waste for purposes of meeting land disposal restriction requirements would require the facility operators to submit a waste analysis plan at least thirty (30) days prior to the commencement of the treatment activity.

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Therefore, should the hazardous waste determination on those materials reveal that it exhibits a characteristic of a hazardous waste, the facility operators are advised to contact the San Antonio Region to ensure that the proposed stabilization activity is properly documented as required under 40 Code of Federal Regulations §268.7(a)(4) (relating to Land Disposal Restrictions - Waste analysis and recordkeeping).

- C. During the facility site inspection, two (2) containers of spent solvent were observed in accumulation in Building 90-2 with another container of hazardous waste (D001) residue generated from the solvent recycling activities (NOR waste code 4011609H). The container of hazardous waste was explained to be the satellite accumulation of waste generated from the solvent recovery system located in Building 90-1. The two (2) other containers were explained to be accumulated prior to being recycled. At that time, the investigator indicated that even though the two (2) containers of spent solvent were to be recycled on-site, the spent solvent was still a waste subject to a hazardous waste determination and (if a hazardous waste) the accumulation time requirements. Regarding the question of whether the spent solvent was a hazardous waste, Mr. Murphy indicated that he believed the solvent to have a flash point of greater than 140 degrees Fahrenheit; however, he was uncertain whether the solvent contained other constituents which may also be characteristics of hazardous waste. Following this discussion, the two containers of spent solvent were moved to the facility's container storage area (NOR unit #002) to be sampled for a hazardous waste analysis. As a result of this issue, the San Antonio Region requests that the facility operators provide copies of the hazardous waste determination results for the spent solvent.
- D. During the review of the facility's records, it was noted that land disposal restriction (LDR) notifications were not included for shipments of restricted wastes that had been sent off-site using Texas State Manifest Document Numbers 1049924, 1053608, 934876 and SKC-40642. When these were identified as missing, Mr. Murphy called the disposal companies to request copies of the forms be sent via fax before the end of the inspection. This request was met by Texas Ecologists, Inc. (Robstown) for manifest number 1049924. Upon receipt of the copy of the LDR notification used for that shipment, it was observed that the copy had a fax transmission note indicating that the form had originally been sent by fax from Mr. Murphy to Texas Ecologists, Inc. prior to the actual date of the shipment. Following this inspection, Mr. Murphy faxed copies of the LDR notification forms for the other shipments of restricted waste which had been sent off-site to Safety-Kleen Corp. (Denton). As a result of CSSA's quick response to the discovery of the missing LDR notification forms and the indication that the forms may have been misfiled while still being kept by the facility operators, no violation of the record keeping regulations has been alleged at this time. However, it is noted that the facility operators are responsible for maintaining all applicable records specified by 30 TAC §335.9 (relating to Record Keeping and Annual Reporting Procedures Applicable to Generators), §335.13 (relating

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to Record Keeping and Reporting Procedures Applicable to Generators Shipping Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste), §335.70 (relating to Recordkeeping) and §335.431 (relating to Land Disposal Restrictions) in addition to any other applicable record keeping requirements that may result from the waste generation activities conducted on the CSSA facility site (including the outer cantonment).

- E. In addition to the missing LDR notification forms addressed above, Texas State Manifest Document Number 946450 was observed to be missing LDR notification forms and a signed (original) copy of the manifest had not been received from the designated facility. It is noted that this shipment had been of waste munitions stored at CSSA for the Camp Bullis Training Site and that the munitions had been removed from storage by representatives of Camp Bullis for disposal at the Explosive Ordnance Detonation (EOD) Range located at Camp Bullis, an adjoining military installation. At the time of the shipment on October 19, 1995, Malcolm A. Ferris (San Antonio Region Waste Program Investigator) had been contacted by Mr. Murphy regarding the shipment and the potential ramification that the quantity of hazardous waste reported on the manifest would have on CSSA's generator status. When apprised of the shipment and the use of the manifest, Mr. Ferris had indicated that a manifest was not necessary for the shipment of hazardous waste between the adjacent facilities. Mr. Ferris noted that CSSA and Camp Bullis shared a contiguous boundary and the waste had been transported between the facilities on a private road controlled by the military. Because the manifest had been used for the shipment, Mr. Ferris advised Mr. Murphy to notify the TNRCC of the corrections to the manifest to indicate the net explosive weight of the munitions, instead of the total weight of the item so as to better document the quantity of hazardous waste involved in the shipment. Following verbal notification of this issue to Mr. Murphy, a copy of an exception report was submitted for the shipment. Although the record review conducted for this inspection revealed that a signed copy of the manifest had not been received from the designated facility within 60 days and that the CSSA facility operators had not provided an exception report, no violation has been alleged due to the fact that the manifest was not needed for the shipment, and because, at that time, the "Military Munitions Rule" had been proposed which clarified the definition of "on-site" conditions that require the use of the manifest. However, it is noted that since the manifest had been used, CSSA should have complied with the manifest system requirements.
- F. The recent removal from Building 90 of a degreasing process unit that used tetrachlorethylene and trichloroethylene solvents was indicated by Mr. Murphy to have involved the filling with concrete the "pit" where the degreasing unit had been located. This unit was reportedly in use since the 1950's. When the facility operators were asked whether an investigation of the "pit" had been conducted to check for the presence of chlorinated solvents prior to the filling of the "pit" with concrete, the facility operators indicated that no investigation had been performed; however, they reassured the investigator that there had been no leaks of spill of the solvents

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while the unit was in operation. However, the investigator indicated that any spillage or leakage during the operation of the unit could have resulted in contamination of the existing concrete and possibly further contamination of the soils underlying the building. The facility operators responded that the building would be investigated sometime in the future when it was to be demolished. However, due to the known contamination of groundwater by chlorinated solvents detected in an upgradient well (Well 16) and due to the potential for contamination of Building 90's concrete floor and underlying soils, the San Antonio Region recommends that CSSA conduct an investigation to determine whether chlorinated solvents have contaminated the soils below the area where the degreaser was originally located. Therefore, the San Antonio Region recommends that the facility operators provide a response which addresses this concern.

INSPECTION COVER SHEET

ID# TX2210020739

Commercial Waste Facility _____
(ck)

Name of company: U.S. Army Camp Stanley Storage Activity
Mailing Address: 25800 Ralph Fair Road, Boerne, Texas 78015-4800
Site Address: 25800 Ralph Fair Road, Boerne, Texas 78006
County: Bexar Type of Industry: U.S. Army - national security
Previous name(s) of company (if applicable): N/A
Property owner (if different than company): N/A

GENERATOR CLASSIFICATION: Industrial Municipal _____

FACILITY CLASSIFICATION: Government Non-Gov't. _____

OPERATIONAL STATUS: Active

Current Waste Management:
(Please note the class of waste(s)
for each activity listed.)

- H = Hazardous
- 1 = Class 1 Non-hazardous
- 2 = Class 2 Non-haz.
- 3 = Class 3 Non-haz.

Generator H, 1, 2
Treatment H
Storage _____
Disposal _____
Transporter _____
Pending Notification _____
and Waste Determination _____

FIELD OPERATIONAL INSPECTION
AUGUST 6 1997

HAZARDOUS WASTE EXEMPTIONS: CE-SQG
(circle >)

SQG

< 90 DAY ACCUMULATION

OTHER*

* (Elementary Neutralization, WW Treatment Tanks, <90 Day Treatment, etc.)

H W FACILITIES (circle codes): SA C T SI WP LT LF I TT TR WDW

N H FACILITIES (circle codes): C T SI WP LT LF I TT TR WDW

TYPE OF INSPECTION (circle) CEI NRR CSE SPL CDI CME OAM

OTH (+ reason)	04 = complaint	06 = closure
	22 = SPL results	34 = UIC
	40 = BIF	46 = DOD
	<u>53</u> = multi-media	61 = state fee bill

Inspector's Name and Title Malcolm A. Ferris, Environmental Investigator

Inspection Participants Brian K. Murphy (Environmental Officer, CSSA)

Date(s) of Inspection August 6, 1997 August 6, 1997
(begin) (end)

Signed: Malcolm A. Ferris 8/21/97 Approved: Craig E. Mappin 08/21/97
(date) (date)

UNIVERSE TRACKING REQUEST

TWC ID: 69026 EPA ID: TX2210020739
 FACILITY NAME: Camp Stanley Storage Activity
 ADD: _____ DELETE: TRS CHANGE: _____ TO: _____
 example: LD, TS LD, TS, LQG, SQG LQG, SQG,
 GN, LQG LD TS
 SQG

PROCESS TYPE:

(CIRCLE THE APPROPRIATE PROCESS TYPE)
 Each code in parenthesis can only be applied
 to the process type that appears with it.

PROCESS TYPE	**POSSIBLE UNITS OF MEASURE	PROCESS TYPE	POSSIBLE UNITS OF MEASURE	PROCESS TYPE	POSSIBLE UNITS OF MEASURE
D79-WDW	(G, L, U, V)	SO1-C	(G, L)	TO1-T	(U, V)
D80-LF	(A, F)	SO2-T	(G, L)	TO2-SI	(U, V)
D81-LT	(B, Q, Y, C)	SO3-WP	(Y, C)	TO3-I	(D, W, E, H, K)
D82-OcD	(U, V)	SO4-SI	(G, L)	TO4-Oth	(D, W, U, V, N, S, J, R)
D83-SI	(G, L)				

****CODES FOR POSSIBLE UNITS OF MEASURE:**

A=acre-feet	L=liters
B=acres	N=short tons per day
C=cubic meters	Q=hectares
D=short tons per hour	R=kilograms per hour
E=gallons per hour	S=metric tons per day
F=hectare-meter	U=gallons per day
G=gallons	V=liters per day
H=liters per hour	W=metric tons per hour
J=pounds per hour	Y=cubic yards
K=BTU's per hour	

PROCESS / CAPACITY AMOUNT: _____
 ** UNIT OF MEASURE USED: _____

UNIT STATUS: (CIRCLE)

- B - verified as actually existing
- L - determined not to exist as a result of a subsequent investigation
- R - found to exist as a result of a subsequent investigation
- N - permitted, not yet under construction
- C - permitted, under construction
- O - previously operated, regulated. now unregulated

* POSSIBLE SUPERFUND SITE YES NO

REQUESTED BY: Mahesh Kumar DATE: Aug 21, 1997

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
FY 97 MULTI-MEDIA TRACKING FORM

Facility/Source Name: U.S. Army - Camp Stanley Storage Activity

Name of Regional Investigators:

Address: 25800 Ralph Fair Road
Boerne, Texas 78015-4800

AGRI _____ AIR _____
IHW Malcolm A. Ferris MSW Malcolm A. Ferris
PST _____ PWS _____
WSM _____ UIC _____

County: Bexar Region: 13 Office: San Antonio

- Targeted Inspection Type: 1. Automotive Paint & Body Shops _____
(check applicable) 2. Automotive Service & Repair Shops _____
3. Refineries & Petrochemical Plants _____
4. Nonferrous Metal Foundries _____
5. Other (describe): U.S. Army military installation motor pool

Inspection Media	ID Number (Permit, Registration, Account, Facility Id #, etc. - as applicable)	Inspection Date(s) (begin/end)	Violations Discovered? (Yes/No)	VIOLATIONS ADDRESSED BY (check all that apply):			
				Regional NOV (date)	Regional BCA (date)	Regional Order (date)	Referral to Central Office (date of referral)
Agriculture							
Air							
IIHW - Hazardous or Industrial Solid	TNRCC SWR # 69926 EPA ID #TX2219829739	08/06/97	Yes 08/20/97	resolved 08/20/97			
IHW - UIC							
IIHW - Radioactive							
Municipal Waste	N/A (used oil & used oil filters)	08/06/97	No				
Petroleum Storage Tank							
Public Water Supply							
Water Quality							

Send original to Multi-Media Coordinator - Jeffie Barbee MC174
Attach copy to the report
REVISED 9-96 jb

INSPECTION COVER SHEET

EPA ID# TX2210020739 Commercial Waste Facility _____ (ck)
 Name of company: U.S. Army Camp Stanley Storage Activity
 Mailing Address: 25800 Ralph Fair Road, Boerne, Texas 78015-4800
 Site Address: 25800 Ralph Fair Road, Boerne, Texas 78006
 County: Bexar Type of Industry: U.S. Army - national security
 Previous name(s) of company (if applicable): N/A
 Property owner (if different than company): N/A

GENERATOR CLASSIFICATION: Industrial Municipal _____

FACILITY CLASSIFICATION: Government Non-Gov't. _____

OPERATIONAL STATUS: Active

Current Waste Management:

(Please note the class of waste(s) for each activity listed.)

- H = Hazardous
- 1 = Class 1 Non-hazardous
- 2 = Class 2 Non-haz.
- 3 = Class 3 Non-haz.

Generator H, 1, 2
 Treatment H
 Storage _____
 Disposal _____
 Transporter _____
 Pending Notification _____
 and Waste Determination _____

HELD OFFICE OF THE ATTORNEY GENERAL
 AUG 25 91

HAZARDOUS WASTE EXEMPTIONS: CE-SQG (circle >)

SQG

< 90 DAY ACCUMULATION

OTHER*

* (Elementary Neutralization, WW Treatment Tanks, <90 Day Treatment, etc.)

H W FACILITIES (circle codes): SA C T SI WP LT LF I TT TR WDW

N H FACILITIES (circle codes): C T SI WP LT LF I TT TR WDW

TYPE OF INSPECTION (circle) CEI NRR CSE SPL CDI CME OAM

- OTH (+ reason) 04 = complaint 06 = closure
22 = SPL results 34 = UIC
 40 = BIF 46 = DOD
 53 = multi-media 61 = state fee bill

Inspector's Name and Title Malcolm P. Bynum, Environmental Investigator

Inspection Participants Paul Oliver (CSSA)

Date(s) of Inspection December 4, 1991 (begin) December 4, 1991 (end)

Signed: [Signature] 8-20-97 (date) Approved: Craig E. Meppen 08/21/97 (date)

TNRCC Industrial & Hazardous Waste Inspection Report
for Non-Permitted Facilities

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 - N - Landfills*
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- 8. Source Reduction/Waste Min. Checklist
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- 11. Maps, Plans, Sketches
- 12. Photographs
- 13. Sample Analysis Results
- 14. Notice of Violation (NOV) Letter
- 15. Interoffice Memorandum (IOM)
- 16. Other (Describe): See list of Attachments

PRE-INSPECTION RECORD REVIEW

Section A -- REQUIRED INFORMATION

1. Has the facility received an EPA ID number? N/A ___ YES NO ___
(N/A to CESQG's)

2. Has the facility received a TNRCC Registration Number? N/A ___ YES NO ___
Note: Inspector should review NOR prior to inspection.

NOTE: If the answer to questions 1 and/or 2 above is "no", then a Non-Notifier Request form should be submitted by the inspector, along with the report.

3. Has proof of deed recordation of all solid waste land disposal facilities been provided to TNRCC? N/A ___ YES ___ NO

4. Did preinspection call to Central Office confirm that the facility has submitted current financial assurance documentation? N/A YES ___ NO ___

Note: Not applicable to generators who qualify as permit exempt per 335.69/262.34

Note: A "no" answer to any of the above questions indicates a possible violation. Please refer to the Facility Record Review checklist or Facility Site Inspection checklist to comment and/or cite violation.

Section B - GENERAL INFORMATION

1. Review Notice of Registration Attachment 6

2. Review permit (if applicable)

3. Review facility file

4. Review Part B application (if applicable)

5. Review shipment summaries (on microfiche/TRACS)

6. Review RCRIS log:

a. Is facility's name correct? YES NO ___
If no, note change on Name Change Request form.

b. What is RCRIS facility status? CESQG ___ SQG LQG ___ TS LD ___ NON ___
Is the status correct? YES NO ___
If no, note change on CMEL and Universe Tracking Request form.

c. Are there outstanding violations for this facility listed in RCRIS? YES ___ NO
If yes, please explain briefly.

These need to be addressed during the inspection and noted on the CMEL.

FACILITY RECORD REVIEW CHECKLIST

Section A -- HW DETERMINATION AND NOTIFICATION [TAC 335.62, .63, .6, 262.11 & 268.7(a)]

1. Has generator completed a hazardous waste determination for each solid waste generated? (262.11) YES _____ NO

COMMENT: When asked about the spent solvents generated from periodic change-over of the solvent vats in Building 90 the facility operators could not verify whether the waste was hazardous or non-hazardous. The facility's NOR includes waste codes for both hazardous and non-hazardous classifications; however, with regard to the wastes observed in accumulation during this inspection, the facility operators were unsure whether the waste exhibited the characteristic of ignitability and nor were they sure of other potential characteristics. It is noted that they no longer use other solvents which may contribute other hazardous constituents, however, since they started recycling spent solvents, the facility has not tested the recycled solvent to check for the presence of hazardous waste constituents. In order to confirm the waste classification of spent solvents in accumulation, the facility operators were advised to test a sample of the spent solvent generated from the vats in Building 90. This issue has been addressed as an Area of Concern in the attached IOM.

COMMENT: In addition, a waste stream of lacquer thinner had been identified in Building 86 (NOR unit #002) as a non-hazardous waste pending receipt of analytical results for a sample collected on August 5, 1997. Further review of the facility's documentation on the lacquer thinner revealed that it had a flash point of 10 °F and contained over 10 per cent by weight of toluene, acetone and methyl ethyl ketone in the original solution. Based upon this information, the waste solvent (lacquer thinner) was determined to be a hazardous waste (D001, F003 and F005) and a new waste stream requiring notification. It is noted that the facility operators should have recognized the characteristics of the product as such to be a hazardous waste and therefore managed as a hazardous waste prior to receiving analytical documentation, particularly due to the presence of the concentrations of toluene, acetone and methyl ethyl ketone in the original solution which make the waste a listed hazardous waste. Due to the apparent failure of the facility operators to recognize the generation of the listed hazardous waste stream by the use of the lacquer thinner, this issue has been addressed in the attached IOM as an alleged violation and due to the response of the facility operators in submitting a waste stream notification for the lacquer thinner, this alleged violation has been resolved.

Check the method used for determination:
 a. Listed as a hazardous waste in 40 CFR Part 261, Subpart D.
COMMENT: See second comment to above question #1.

- b. Process or materials knowledge.
- c. Tested for characteristics as identified in Part 261, Subpart C.

3. For each hazardous waste generated, has the generator determined if it is restricted from land disposal? N/A ___ YES NO ___

Note: For hazardous waste generators, inspector must complete Section D.

4. Is written notification of all waste streams generated and waste management units current? (335.6) YES ___ NO

COMMENT: See second comment to above question #1. This violation has been addressed in the attached IOM as a violation alleged and resolved during current inspection.

5. Has the facility received an EPA ID number? (262.12) (N/A to CE-SQG's) N/A ___ YES NO ___

6. Has the facility received a TNRCC Registration Number? N/A ___ YES NO ___
Note: Inspector should review NOR prior to inspection

7. Has proof of deed recordation of all solid waste land disposal units (including closed or abandoned) been provided to TNRCC? (335.5) N/A ___ YES ___ NO

COMMENT: In addition to closure of the open burning / open detonation unit (B-20) required by the U.S. EPA's June 30, 1993 Complaint, Compliance Order and Notice of Opportunity for Hearing, there are at least 26 solid waste management units currently undergoing closure at the facility. A work plan dated February 1996 was received at the San Antonio Region on March 5, 1996 for closure of 26 solid waste management units. To date, the facility operators have not listed any of these units on the facility's NOR and none of the units have been closed with wastes in place. This broader issue of including these units on the NOR is addressed as an Area of Concern in the attached IOM.

Section B -- RECORDKEEPING and REPORTING [335.6, .9, .13, .70-71, .329 & 268.7a(6)]

1. Does generator maintain the following records and reports, if applicable, for three years or 5 years for landban documentation:
- a. Waste classification documentation? YES NO ___
 - b. Analytical results of HW and landban determinations? N/A ___ YES NO ___
 - c. Waste shipping manifests and landban documentation? N/A ___ YES ___ NO

COMMENT: LDR notifications were apparently misfiled for manifests used to ship restricted wastes to Texas Ecologists, Inc., Robstown, TX (manifest #10449924) and also for three shipments of restricted wastes to Safety-Kleen, Denton, TX (manifests #SKC-40642, 1053608 & 934876). Following verbal notification of the potential violation, Mr. Murphy contacted the disposal facilities and received copies of the LDR notification forms for CSSA's files. Due to the presence of a fax note on the LDR notification form received from Texas Ecologists, Inc. which indicated that the form had been originally sent via fax from Mr. Murphy to Texas Ecologists, Inc., no violation has been alleged at this time; however, this issue is addressed as an Area of Concern

in the attached IOM.

- d. Monthly off-site shipment summaries (out-of-state only)? N/A ___ YES NO ___
- e. Monthly on-site land disposal summaries?
[N/A to generator only, applies to operator of HW
on-site land disposal facility (335.329.b.5)] N/A YES ___ NO ___
- f. Monthly waste receipt summaries (TSD facilities only)? N/A YES ___ NO ___
- g. Company records of industrial solid waste activities? N/A ___ YES NO ___
- h. Company records of hazardous waste activities for municipal
HW generators of >100 kg/mo. or >1 kg/mo. acutely HW? N/A YES ___ NO ___
- i. Annual reports (submitted by January 25)? N/A ___ YES NO ___

Section C -- INTERNATIONAL SHIPMENTS (335.76)

N/A

Section D -- MANIFEST AND LAND DISPOSAL RESTRICTION (LDR) NOTIFICATIONS (335.10 & 268.7)

1. Does the generator use waste manifests when shipping Hazardous and Class 1 wastes off-site? N/A ___ YES NO ___
2. Are Waste Manifests properly completed and signed? N/A ___ YES NO ___
3. Are off-site disposal facilities RCRA-permitted or operating under interim status standards? N/A ___ YES NO ___
4. Identify primary off-site disposal/recycling facilities and note if they are not authorized (this may be a violation):
Treatment One (Houston), EPA ID# TXD055135388; Texas Ecologists (Robstown), EPA ID# TXD069452340; Hydrocarbon Recyclers, Inc. (San Antonio), EPA ID# TXD052649027; and Eltex Chemical & Supply Co. (Houston), EPA ID# TXD074196338.
5. Has generator submitted exception reports to TNRCC for any original (white) copies of manifests not received back from receiving facilities? (N/A to all CE-SQG's) N/A ___ YES ___ NO

COMMENT:

Texas State Manifest Document Number 00946450 was used on October 19, 1995 for a shipment of waste munitions to be disposed by thermal treatment at the neighboring Camp Bullis interim status explosive ordnance disposal (EOD) range. During this inspection, Camp Stanley's facility records did not include a signed (original) copy of this manifest. It is noted that at the time of shipment, Malcolm A. Ferris was contacted at the San Antonio Region by Brian K. Murphy for the facility, regarding the need for the manifest and other issues involved with the shipment of waste munitions to the neighboring military facility. Mr. Ferris had noted that the transfer of the munitions could have been handled differently, however, since the shipment had already been made when Mr. Murphy contacted the TNRCC and since a manifest had been used, then Camp Stanley was required to comply with the manifest. It is also noted that, at the time of the 1995 shipment, revisions to the definition of "on-site" were proposed under the Military Munitions Rule, that those revisions were intended to address this type of

issue and that, since the final promulgation of that rule, a manifest is no longer required for transportation of hazardous waste between adjacent sites and which have access through a private road. Furthermore, it is noted that in the preamble to the final rule it states that this was the intent of the existing manifest requirements and that the Munitions Rule was simply a clarification of those existing requirements. Following verbal notification of the requirement for an exception report for not having received a signed copy of this manifest from the designated facility, the operators of Camp Stanley provided an exception report to the TNRCC on August 6, 1997. As a result of these mitigating factors, this issue of the exception report for the manifest (00946450) has been addressed as an Area of Concern in the attached IOM.

6. Were restricted wastes shipped off-site to an authorized TSDF? N/A ___ YES NO ___
7. If yes, did the generator or handler provide the following information along with each hazardous waste manifest [268.7(a)]:
- a. Manifest document number? N/A ___ YES NO ___
 - b. EPA waste identification code? N/A ___ YES NO ___
 - c. Applicable treatment standards for each waste, applicable category and subcategory for each waste, an adequate reference of the standards, or 5-letter treatment code, if allowable? N/A ___ YES NO ___
 - d. Waste analysis data, if available? N/A ___ YES NO ___

COMMENT: During review of the facility records, it was noted that the required LDR notifications were not available for some manifests. Following verbal notification of the requirement to maintain copies of LDR notifications for a period of five (5) years, the facility operators contacted the designated facilities identified on the manifests and received copies of the notification forms used for the shipments. However, it is also noted that the October 19, 1995 shipment of waste munitions to Camp Bullis was not accompanied by LDR notification. Due to the mitigating factors mentioned in the comment to question 5 of this section, the requirement for the use of LDR notification for that waste munitions shipment has been addressed as an Area of Concern in the attached IOM.

8. For wastes being shipped off-site meeting treatment standards, or where wastes meet treatment standards and are disposed of on-site, did the facility certify that the waste meets all applicable treatment standards, including the statement in 268.7(a)(2)(ii)? N/A YES ___ NO ___
9. If a restricted waste is subject to a case-by-case extension (268.5), exemption (268.6), or nationwide capacity variance (268, Subpart C), with each shipment, did the generator notify the TSDF that the waste is not prohibited from land disposal, including the date the waste is subject to the prohibitions [268.7(a)3(v)]? N/A YES ___ NO ___
10. If the generator has shipped lab packs off-site

[268.7(a)(8&9)], have appropriate certifications accompanied shipments? N/A YES NO

Section E -- MANIFESTS, RECORDS, & REPORTS (TAC 335.12) N/A

NOTE: This section applies to facilities receiving hazardous and Class 1 wastes from off-site.

Section F -- LAND DISPOSAL RESTRICTION REQUIREMENTS (40 CFR 268) N/A

NOTE: N/A to CESQGs

PART I: WASTE IDENTIFICATION AND TESTING

1. Has the facility determined whether restricted wastes or treatment residues exceeded the appropriate treatment standards based on the following:
A. Knowledge of Process [268.7(a)]? N/A YES NO

NOTE: It is appropriate for a handler to determine that his restricted waste exceeds treatment standards upon generation using knowledge of process so long as this information is documented.

B. Testing [268.7(a),(b),(c)(2); 268.41,42,&43]?
i. Did the facility test the waste, an extract, or treatment residue (as appropriate) to assure compliance with the applicable treatment standards and prohibitions, including new treatment standards established under Phase II? N/A YES NO

ii. Is the testing repeated at an adequate frequency or the frequency stated in the facility's waste analysis plan (WAP)? N/A YES NO

iii. For California List wastes, did the generator determine the waste to be liquid or non-liquid by the Paint Filter Liquids Test (PFLT)? N/A YES NO

2. If treatment standards specify a particular technology, did the facility utilize the correct method (268.42)? N/A YES NO

3. Did the facility identify specific constituents in F001 - F005 wastes, F039 wastes, or the underlying hazardous constituents in D001, D002, and in TC organic wastes? N/A YES NO

a. If No, is the generator or treater going to monitor for all potential hazardous constituents in the treated waste)? N/A YES NO

PART II: TREATMENT AND DILUTION

4. Did the generator dilute a restricted hazardous waste in a manner which is prohibited (268.3)? N/A NO YES

Was the restricted waste or residue a characteristic waste which was treated by mixture with other wastewater discharged under the terms of an NPDES permit or UIC permitted injection well [268.1(c)(3), 268.3(b)]? N/A YES NO

6. Does the generator mix restricted wastes which have different treatment standards? N/A YES ___ NO ___
7. Does the facility handle characteristic hazardous wastes which have been rendered non-hazardous by on-site treatment [268.9(d)]? N/A YES ___ NO ___
- COMMENT: Prior to 1987, CSSA operated an open burn / open detonation (OB/OD) area (B-20) for the thermal treatment of waste munitions (characteristically reactive hazardous waste, D003). Following a 1993 inspection of the facility by the EPA, an enforcement order was issued on June 30, 1993 for the unpermitted treatment of hazardous waste by CSSA. On May 21, 1996, the facility operators settled with the EPA and the former OB/OD area is now undergoing closure.
8. For generators who qualify as permit exempt per 335.69/262.34, and who treat restricted waste in containers or tanks (in order to meet the treatment standards of 268, Subpart D):
- a. Has the facility developed and followed a written waste analysis plan (WAP)? (Refer to Section L) N/A YES ___ NO ___
- b. Is the WAP kept on-site? N/A YES ___ NO ___
- c. Has the waste analysis plan (WAP) been submitted to EPA or TNRCC 30 days prior to the treatment activity? N/A YES ___ NO ___

PART III: DISPOSAL

NOTE: Applicable to both generators & disposal facilities.

9. Prior to placement of waste in a land-based unit, or prior to disposal, did the waste meet all applicable treatment standards? N/A YES ___ NO ___
10. If the waste or treatment residue is a listed hazardous waste, was it placed in a unit that meets all minimum technological requirements (MTR)? N/A YES ___ NO ___
11. If the answer to either 1 or 2 is no, is the activity authorized by some exemption, a variance from the LDR requirements, a case-by-case extension, a variance that authorizes alternate treatment standards, or some other authorization? N/A YES ___ NO ___

Section G -- PERSONNEL TRAINING (40 CFR Part 265.16)

N/A ___

1. Does the owner/operator maintain a personnel training program designed to prepare employees to respond effectively to hazardous waste emergencies? N/A ___ YES NO ___
- *2. Is the program directed by a person that has received training in hazardous waste management procedures? N/A YES ___ NO ___
- *3. Is a training review given annually? N/A YES ___ NO ___
- *4. Does the owner/operator keep the following records at the facility:
- a. Job title and written job description of each position? N/A YES ___ NO ___

*** An entry in this column indicates corrective action or comment is needed.

b. Description of the type and amount of training? N/A YES NO

Not applicable to Small Quantity Generators [262.34(d)(5)(iii)]
COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SQG) of hazardous waste.

Section H -- PREPAREDNESS and PREVENTION (265.30-.37) N/A

1. Has the owner/operator attempted to familiarize local response authorities and hospitals (as appropriate) with: facility layout, entrances and evacuation routes, hazardous waste properties and hazards (including types of injuries which could result) & the work locations of facility personnel? N/A YES NO
- Has a primary authority been designated in case more than one law enforcement or fire department responds? N/A YES NO
3. Has the owner/operator attempted to reach agreements with emergency response contractors and equipment suppliers? N/A YES NO
4. If local authorities decline to enter into the above-noted agreements, is this documented? N/A YES NO

Section I -- EMERGENCY PROCEDURES FOR SQGs [40 CFR 262.34(d)] N/A

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SQG) of hazardous waste.

1. Has an emergency coordinator been designated? N/A YES NO
2. Is the emergency coordinator familiar with the

emergency response procedures in 262.34(d)(5)(iv)?

N/A YES NO

Section J -- CONTINGENCY PLAN and EMERGENCY PROCEDURES (265.50-.56) N/A

NOTE: N/A to SQGs

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SQG) of hazardous waste.

Section K - WASTE ANALYSIS (40 CFR 265.13 & 268.7)

N/A

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SQG) of hazardous waste.

Section L - OPERATING RECORD (40 CFR 265.73 & 268.50)

N/A

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SQG) of hazardous waste.

Section M - FINANCIAL ASSURANCE (40 CFR 265.140-.150)

N/A

Note: N/A to SQGs and < 90 day facilities.

Section N -- CLOSURE/POST-CLOSURE REQUIREMENTS (265.110-.120) N/A

NOTE: If closure of a facility is in progress, include Closure-In-Progress section.

CLOSURE PLAN (CFR 265.110-116) N/A NOR FAC. #(s) NOT LISTED

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. This section of the checklist has been completed to reflect the status of the closure activities required under the 1996 CACO.

NOTE: N/A to SQGs and < 90 - day facilities

1. Circle hazardous waste facilities subject to RCRA CLOSURE:

CLOSURE: C T SI WP LT LF I BIF TT TR O

2. Does the facility have a written closure plan? N/A YES NO

3. Does the closure plan address all hazardous waste units? N/A YES NO

4. Does the closure plan include:

a. A description of how and when the facility will be:
(1) Partially Closed N/A YES NO
(2) Finally Closed N/A YES NO

b. An up-to-date estimate of maximum inventory of hazardous wastes in storage and treatment at any time during the life of the facility? N/A YES NO

c. An estimate of the expected year of closure? N/A YES NO

COMMENT: The original "Partial Facility Closure Plan - B-20 Detonation Area" (dated March 1994) included a schedule for completion of corrective measures implementation within six months of the plan's approval by the EPA and TNRCC (time frame required under enforcement order of June 1993); however, that plan also indicated that the estimate for closure was based on "working days" and that an extension of the enforcement order time frame would be requested. Since that time amendments to the closure plan have been received by the San Antonio Region, however, these amendments no longer include a schedule for the completion of the closure activities. It is noted that at present the site has been cleared of unexploded ordnance and that closure is expected pending approval of background metals concentrations and additional verification sampling. The May 21, 1996 settlement of the original enforcement order resulted in the

issuance of an amended Consent Agreement and Consent Order which addresses the extended time frames for the completion of the closure activity; therefore, this has not been cited as a violation at this time.

5. Does the plan include a schedule for final closure which includes?
a. Time estimates for each phase of closure for each area? N/A ___ YES NO ___
b. Time estimate for total closure? N/A ___ YES NO ___
6. Are the following steps to close included in the plan:
a. Removal of wastes N/A ___ YES NO ___
b. Treatment of wastes N/A ___ YES NO ___
c. Disposal of wastes N/A ___ YES NO ___
d. Cap or final cover N/A YES ___ NO ___
e. Decontamination of equipment & structures N/A YES ___ NO ___
f. Closure certification N/A ___ YES NO ___

POST-CLOSURE PLAN (265.117-120) N/A NOR FAC. #(s) _____

7. Circle hazardous waste facilities subject to RCRA Post-Closure:
SI WP LT LF T O
8. Does the facility have a written Post-Closure Plan? N/A YES ___ NO ___
9. Does the plan address all RCRA Land Disposal facilities? N/A YES ___ NO ___
10. Does the plan provide for 30 years of post-closure care? N/A YES ___ NO ___
11. Does the Post-Closure Plan include:
a. Description of planned groundwater monitoring activities and the frequencies at which they will be performed? N/A YES ___ NO ___
b. Description of planned maintenance activities and frequencies they will be performed to ensure the following:
(1) Integrity of final cover or other containment N/A YES ___ NO ___
(2) Proper functioning of groundwater monitoring equipment N/A YES ___ NO ___
(3) Proper functioning of leachate collection equipment N/A YES ___ NO ___
(4) Proper functioning of gas collection equipment N/A YES ___ NO ___
c. Name, address and phone number of facility contact person for the post-closure period? N/A YES ___ NO ___
12. Has the Post-Closure Plan been amended as necessary to reflect changes in operation or design of the facility? N/A YES ___ NO ___
13. If RCRA Closure has occurred:
a. Did the owner/operator make proper notification to the local land authority? N/A YES ___ NO ___

b. Did the owner/operator make proper notification in the deed to property of prior HW land use and future land-use restrictions? N/A YES NO

CLOSURE-IN-PROGRESS N/A _____ NOR FAC. #(s) _____

Type of Facility Component: Open detonation area (B-20)

14. Is the facility being closed a RCRA unit? N/A YES NO
If no, did the facility provide 10-day notification to the TNRCC (335.8c)? N/A YES NO

15. Type of Closure: Full-Facility Closure: _____ Partial Closure:

16. Has closure plan received TNRCC approval or final modification? N/A YES NO
Date of approval: December 29, 1995

17. Is this the last on-site facility to be closed which requires RCRA groundwater monitoring? N/A YES NO

18. Has an approved public notice of closure been published? N/A YES NO
Date published: January 24, 1996

19. Is a public hearing required? N/A YES NO
Date of hearing: N/A

20. Has on-site closure work started? N/A YES NO
Date work initiated: November 7, 1994

21. Is closure work proceeding according to the work schedule in the approved closure plan? N/A YES NO

COMMENT: As noted in the original "Partial Facility Closure Plan," the schedule of work has not been met. This is due in part to the difficulties encountered in the clearing of unexploded ordnance from the former open detonation area. The May 21, 1996 settlement of the original enforcement order resulted in the issuance of an amended Consent Agreement and Consent Order which addresses the extended time frames for the completion of the closure activity; therefore, this has not been cited as a violation at this time.

22. Have 180 days elapsed since TNRCC approval of the closure plan? N/A YES NO
a. If Yes, has TNRCC approved an extension period? N/A YES NO

23. Was Region office notified of sampling event when complete removal (i.e., clean closure) of a Land Disposal facility was to have been accomplished? N/A YES NO

24. Were TNRCC samples taken to verify completion of closure? N/A YES NO

NOTE: List chain-of-custody sample tag numbers.

25. Is the closure work completed? N/A ___ YES ___ NO
Date of completion: N/A

26. If yes to 25., has the closure certification been submitted to TNRCC? N/A YES ___ NO ___
Attach copy or explain.
Date of certification: N/A

Section O -- GENERAL INSPECTION REQUIREMENTS (40 CFR 265.15) N/A

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SOG) of hazardous waste.

Section P -- Tanks, Existing Tank Systems (40 CFR 265.191) N/A

Section Q -- Tanks, New Tank Systems (40 CFR 265.192) N/A

Section R -- Tanks, Special Requirements for Ignitable or Reactive Wastes (40 CFR 265.198)

Check here if this section is not applicable. N/A

Section S -- Tanks, Special Requirements for Incompatible Wastes (40 CFR 265.199)

Check here if this section is not applicable. N/A

Section T -- Tanks, Closure and Post-Closure Care (40 CFR 265.197)

Check here if this section is not applicable. N/A

Section U -- Landfills (40 CFR Part 265.300-.316)

Check here if this section is not applicable. N/A

Section V -- Surface Impoundments (40 CFR 265.220-.230)

Check here if this section is not applicable

N/A ✓

COMMENT:

CSSA has identified solid waste management unit (SWMU) O-1 as a former oxidation pond which received office wastes. Following the detection of chlorinated solvent contamination in Well #16, CSSA investigated former SWMUs and found that O-1 was contaminated with tetrachloroethylene (PCE) at concentrations exceeding 10,000 mg/kg. This section of the checklist has not been completed since O-1 was not originally identified as a hazardous waste management unit; however, it is noted that the unit currently contains hazardous waste. O-1 is currently being tested for treatment by a new technology involving the enhanced oxidation of the chlorinated solvents by electrolytic induction.

Section W -- GROUNDWATER MONITORING (40 CFR 265.90-.94)

N/A ✓

FACILITY SITE INSPECTION CHECKLIST

Section A -- GENERAL SITE INFORMATION

1. Are any solid waste facilities located in the 100-year floodplain?
N/A ___ NO ___ YES

2. Describe land use within one mile Camp Bullis Military Reservation borders to the east and southeast, low density residential developments to the west and southwest and some commercial properties along IH-10 to the west.

3. Are there any closed or abandoned solid waste facilities? N/A ___ NO ___ YES

COMMENT: In addition to closure of the open burning / open detonation unit (B-20) required by the U.S. EPA's June 30, 1993 Complaint, Compliance Order and Notice of Opportunity for Hearing, there are at least 26 solid waste management units currently undergoing closure at the facility. A work plan dated February 1996 was received at the San Antonio Region on March 5, 1996 for closure of 26 solid waste management units. To date, the facility operators have not listed any of these units on the facility's NOR and none of the units have been closed with wastes in place. This broader issue of including these units on the NOR is addressed as an Area of Concern in the attached IOM.

NOTE: Attach PLANT MAP or SKETCH showing site orientation, waste management facilities, and major topographic features.

Section B -- UNAUTHORIZED DISCHARGES (335.4 & Chapter 26 Texas Water Code)

1. Is there any evidence of fires and explosions or leaks and discharges to the environment from solid waste facilities or any other type of facility?
N/A ___ NO ___ YES

COMMENT: In 1991, sampling of Well #16 by the Texas Department of Health and subsequent sampling by the San Antonio office of the Texas Water Commission confirmed the presence of chlorinated solvents (tetrachloroethylene, trichloroethylene and dichloroethylene) in the groundwater (Cow Creek aquifer). The sources of contamination have been identified as potentially having come from former solid waste management units operated up gradient from the well. The two SWMUs of the highest potential for being the source(s) of the contamination are an oxidation pond (O-1) and a landfill (B-3) which both have been reported to have received only office wastes. Both units are currently being remediated by in-situ treatment technologies under closure plans approved by both the EPA and the TNRCC. No violation has been cited at this time.

2. If yes, have they been reported and remedied?
N/A ___ YES ___ NO ___

COMMENT: See above comment.

Section C -- ACCUMULATION TIME EXEMPTIONS (335.69 & 335.78) N/A ___

NOTE: Hazardous wastes may be accumulated in Containers or Tanks without a permit for up to 90 days for large quantity generators, or 180 days for SQGs, or 270 days for SQGs that must transport waste >200 miles.

*1. Is the beginning date of accumulation clearly indicated on each container? N/A ___ YES ___ NO ___

*2. Is each container or tank clearly labeled or marked "Hazardous Waste"? N/A ___ YES ___ NO ___

COMMENT: Two (2) containers (metal drums, one 30-gallon and the other 55-gallon capacity) of spent solvent (naphtha) were observed in accumulation prior to recycling through the facility's solvent recovery system. When first observed, these containers were located in Building 90-2 with another 55-gallon black metal drum that was reportedly for satellite accumulation of the semi-solid residues generated by the operation of the solvent recovery system (Photograph 5). The containers of the spent solvents were not labeled or marked as "hazardous waste." When asked whether the spent solvents were hazardous or not, the facility operators could not answer with certainty (see comment to Question 1, Section A of Facility Record Review Checklist). Following verbal notification of the potential violation of this accumulation time requirement, the facility operators relocated the drums of spent solvent to Building 86 (NOR unit #002); however, the drums were not marked or labeled with the words "hazardous waste." Because the waste was not determined to be a hazardous waste, this issue has been addressed as an Area of Concern in the attached IOM.

**3. Did generator exceed the Accumulation Time limitation? N/A ___ NO ___ YES ___

4. Did SQG or CE-SQG exceed Accumulation Quantity limitation? N/A ___ NO ___ YES ___

NOTE: SQG: Total quantity of HW must never exceed 6000 kg.
CE-SQG: Total quantity of HW must never exceed 1000 kg.

- * Not applicable to Municipal and Industrial CE-SQGs.
- ** Prohibition found in 268.50(a)(1) applies also, ie. must accumulate solely for the purpose of necessity to facilitate proper recovery, treatment, or disposal and complies with the accumulation time requirement.
Otherwise permit required violation applies.

Section D -- PREPAREDNESS and PREVENTION (265.30-.37) N/A ___

1. Is the facility equipped with:
 - a. Internal communication or alarm system within easy access? N/A ___ YES ___ NO ___
 - b. Communication system to call off-site emergency assistance? N/A ___ YES ___ NO ___
 - c. Fire, spill control, and decontamination equipment? N/A ___ YES ___ NO ___
 - d. Adequate fire-water supply (volume & pressure)? N/A ___ YES ___ NO ___

2. Is the above-noted emergency equipment regularly tested?

*** An entry in this column indicates corrective action or comment is needed.

N/A ___ YES NO ___

3. Is aisle space sufficient to allow unobstructed movement of personnel and equipment? N/A ___ YES NO ___

NOTE: Measure or estimate aisle space: Variable. In Building 86 (NOR unit #002) there were four compartments, only one held potentially hazardous waste (see comment to Question 2, Section C - Accumulation Time Exemptions, above). Satellite accumulation units were located within 2 feet of walls and provided with over 3 feet of space on at least one side.

Section E -- EMERGENCY PROCEDURES FOR SOGs [262.34(d)] N/A ___

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SOG) of hazardous waste.

1. Is the following information posted by the telephone:
a. Name & telephone no. of the emergency coordinator N/A ___ YES NO ___
b. Location of emergency equipment N/A ___ YES NO ___
c. Telephone no. of fire department N/A ___ YES NO ___
(Unless facility has direct connection)

Section F - SECURITY (265.14) N/A

COMMENT: CSSA is listed in RCRIS as a treatment/storage facility for the former open burning / open detonation (OB/OD) activities conducted at area B-20. This area was last used for thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) by CSSA in 1987. Area B-20 is currently being closed under a partial facility closure plan approved by the EPA in accordance with the requirements of an enforcement order originally issued on June 30, 1993 and the subsequent Consent Agreement and Consent Order (CACO) issued on May 21, 1996 upon settlement of the violation for unpermitted treatment of hazardous waste. For the purposes of this inspection, the facility has been addressed as a small quantity generator (SOG) of hazardous waste.

Section G -- SPECIAL REQUIREMENTS (265.17) N/A

Section H -- CONTAINER STORAGE AREA REQUIREMENTS N/A ___

Container Requirements (265. 170-177). NOR FAC. #(s) 002

*** An entry in this column indicates corrective action or comment is needed.

1. Are containers in good condition? N/A ___ YES NO ___
Are the containers compatible with the wastes being stored? N/A ___ YES NO ___
3. Are containers kept closed and stored in a safe manner? N/A ___ YES NO ___
4. Are containers inspected weekly for leakage and deterioration? N/A ___ YES NO ___
- 5.* Are containers holding ignitable or reactive wastes kept at least 15 meters (50 ft) from the facility property line? N/A ___ YES NO ___
6. Are containers holding incompatible wastes separated by a physical barrier or sufficient distance? N/A ___ YES NO ___
- 7.** Does the storage area have adequate containment protection? N/A YES ___ NO ___

8. Describe CSA(s).

COMMENT: Building 86 (NOR unit #002) is a new hazardous materials storage building with four (4) compartments. Each compartment is provided with secondary containment and automatic fire suppression (currently dry chemical powder only, water to be hooked up for sprinkler system).

NOTE: 90-DAY accumulation rules are in TAC 335.69.

- * Not Applicable to Small Quantity Generators.
- ** NOT REQUIRED until permit is issued.

LDR Container Storage Requirements (268.50). N/A ___

9. Have restricted wastes exceeding treatment standards been stored in the CSA for more than one year? N/A ___ YES ___ NO

NOTE: Ques. no. 9 does not apply to Conditionally Exempt Small Quantity Generators.

Section I -- SATELLITE ACCUMULATION AREAS [40 CFR 262.34(c)] N/A ___

NOTE: Generators may accumulate HW in containers at or near the point-of-generation without a permit if they meet the following conditions.

1. Are containers in good condition ? N/A ___ YES NO ___
2. Is the waste compatible with the containers ? N/A ___ YES NO ___
- Are containers kept closed (except when adding or removing waste) N/A ___ YES NO ___
4. Are containers marked "hazardous waste" or labeled to identify the contents ? N/A ___ YES NO ___

*** An entry in this column indicates corrective action or comment is needed.

5. If waste accumulation has exceeded 55 gallons (or 1 qt. of acutely HW):

- a. Has container holding excess amount been marked with beginning date of excess accumulation
- b. Have excess amounts remained in satellite area over 3 days?

N/A ___ YES NO ___

N/A ___ NO ___ YES

COMMENT: As noted the comment to Question 2, Section C - Accumulation Time Exemptions, the drums of spent solvent generated from the change-out of the solvent vats in Building 90 that were observed accumulated in Building 90-2 were located with the 55-gallon drum (1/4-full) for satellite accumulation of the waste generated from the operation of the solvent recovery system (located in Building 90-1). The drums of spent solvent were marked with a date of generation, but as mentioned in the comment to Question 1 of Section A in the Facility Record Review checklist, the facility operators did not consider the spent solvent to be a waste because they were intending to recycle the spent solvent. Following verbal notification of the potential violation of the accumulation time requirements, the facility operators relocated the drums of spent solvents to Building 86 (NOR unit #002). This issue has been addressed as an Area of Concern in the attached IOM.

6. Describe satellite accumulation area(s).

COMMENT: As noted in the above comment to Question 5.b. of this section, the waste generated from the operation of the solvent recovery system (Photograph 4) was initially observed to be accumulated in a black metal 55-gallon drum which was located in Building 90-2 (Photograph 5). The solvent recovery system unit was located in a shed attached to Building 90-1, approximately 50 to 70 feet away from the location of the drum identified for satellite accumulation of waste from that unit. Due to the initial observation of the two (2) drums containing spent solvent in the Building 90-2, the facility operators moved the drum for the satellite accumulation of waste from the solvent recovery system into the shed where the recycling unit was located (Building 90-1).

COMMENT: Satellite accumulation of various waste streams was observed in Building 90 (Photographs 2 & 3). These included solvent contaminated rags which were reportedly sent for cleaning and re-use to an off-site laundry, other contaminated rags (from gun-cleaning) which were to be analyzed prior to disposal (usually Class 1 waste stream, 10094891), used absorbent (sand), and a waste stream of "residue (sludge) from 'wet' washing system" (waste code 4010219H).

COMMENT: Another satellite accumulation area was noted in the Pharmacy area (Photograph 14). Five (5) 5-gallon plastic buckets were located beneath aerosol can puncturing/emptying devices to capture the paint waste from the emptied cans. A 55-gallon black metal drum was also provided for satellite accumulation of paint waste and thinner. This drum was

provided with a hazardous waste label and marked as a "satellite accumulation area" for "waste paint thinner." The facility operators explained that the 5-gallon buckets were rinsed out with some solvent and the mixture accumulated in the larger container. Due to the potential for this site to have an excess of 55-gallons of the waste stream in accumulation at one-time, the investigator advised that the facility operators address this potential by written standard operational procedures or use a smaller container than the 55-gallon drum provided. It was also noted that this waste stream had been accumulating for over a year without generating a total of 55-gallons.

Section J - TANKS, CONTAINMENT AND DETECTION OF RELEASES [40 CFR 265.193]

Check here if this section is not applicable. N/A ✓

Section K -- Tanks, Inspections (40 CFR 265.195) N/A ✓

Section L -- SOG Tank, Inspections (40 CFR 265.201) N/A ✓

Section M -- Surface Impoundment [40 CFR 265.220-.230] N/A ✓

COMMENT: CSSA has identified solid waste management unit (SWMU) O-1 as a former oxidation pond which received office wastes. Following the detection of chlorinated solvent contamination in Well #16, CSSA investigated former SWMUs and found that O-1 was contaminated with tetrachloroethylene (PCE) at concentrations exceeding 10,000 mg/kg. This section of the checklist has not been completed since O-1 was not originally identified as a hazardous waste management unit; however, it is noted that the unit currently contains hazardous waste. O-1 is currently being tested for treatment by a new technology involving the enhanced oxidation of the chlorinated solvents by electrolytic induction.

Section N -- Landfills (40 CFR 265.300-.316) N/A ✓

TNRCC FIELD OPERATIONS CHECKLIST

SOURCE REDUCTION & WASTE MINIMIZATION PLAN

TNRCC Region	San Antonio	Date	August 21, 1997
Company Name	U.S. Army - Camp Stanley Storage Activity	IDs: EPA	TX2210020739
Facility Name	U.S. Army - Camp Stanley Storage Activity	Solid Waste	69026
		Air	

Malcolm A. Ferris
 TNRCC Representative
 Date of Plan 04/16/96

Brian K. Murphy (CSA)
 Company Representative
 CI2000 Member YES ___ NO

- Does the Plan cover five (or more) years? YES NO
 30 TAC §335.474.
- Are there separate components addressing source reduction and waste minimization? YES NO 30 TAC §335.474.
- Is there an estimate of the type and amount of reduction anticipated? YES NO 30 TAC §335.474.(1)d
- Are there source reduction and waste minimization goals for the entire facility, including incremental goals to aid in evaluating progress? YES NO 30 TAC §335.474.(1)f
- Is there a statement to show the company has attempted to identify cases in which the implementation of a SR/WM activity may result in the release of a different pollutant or contaminant or shift the release to another medium? YES NO 30 TAC §335.474.(1)i

REMARKS/COMMENTS
Facility operators have been implementing a hazardous materials pharmacy which has reduced the quantities of hazardous materials handled by the facility and provided better tracking of the use of hazardous materials.

Note: Please see reverse of this checklist for instructions.