

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Files Date: August 21, 1997

Thru: Ernest Heyer, Chief, Program Services Unit
Field Operations Division

From: Malcolm A. Ferris, Field Investigator
Region 13, San Antonio

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

INTRODUCTION

On August 6, 1997, Malcolm A. Ferris of the Texas Natural Resource Conservation Commission (TNRCC) conducted an announced industrial solid waste Compliance Evaluation Inspection (CEI) of the Camp Stanley Storage Activity (CSSA) facility located in northwestern Bexar County, northeast of Interstate Highway 10, approximately three miles north of Loop 1604. The eastern boundary and part of the northern and southern boundaries of CSSA are contiguous with Camp Bullis Military Training Site, U.S. 5th Army, Fort Sam Houston (Figure 1, Attachment 1). The surrounding land to the west of CSSA is rural, low density residential property and some commercial property along the IH-10 growth corridor. Prior notification of this inspection was provided to the facility operators (represented by Brian K. Murphy, CSA, Environmental Officer) by phone on July 28, 1997. The investigator's handwritten field notes have been included as Attachment 2 to this report. The facility's status in RCRIS was confirmed prior to the facility inspection, and the most recent copy of the printout for this facility has been included as Attachment 3.

As noted in the RCRIS log, CSSA had been issued a Consent Agreement and Consent Order (CACO) on June 30, 1993, and this was resolved, with penalties and Supplemental Environmental Projects (SEP), on May 21, 1996 (Attachment 4). The CACO had been issued due to the use through 1987 of an unpermitted open burn / open detonation facility (B-20) for the disposal of reactive (D003) hazardous waste ordnance. As a result of the CACO, CSSA has been performing partial facility closure activities at B-20. This issue is discussed further below.

The August 6, 1997 site visit reviewed the areas of the CSSA facility identified by the operators as locations where hazardous wastes were currently managed and some locations where hazardous wastes were previously managed. Prior to the site inspection, an in-briefing was held with Commanding Officer Colonel Ernest N. Roberson, Jr., Mr. Murphy, Ron Chatham, Raphael "Ralph" Chavez, Paul Oliver, Raymond Minor and other CSSA staff members. The tour of the facility was conducted by Mr. Murphy. The facility tour included Building 90 (weapons maintenance operations), adjacent Buildings

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 2

90-1 and 90-2 (solvent recycling), Building 4 (motor pool), Building 40 (former <90-day container storage area), Building 86 (current <90-day container storage area and non-hazardous waste storage) and Warehouse 93 ("pharmacy" building for hazardous materials product distribution). Review of the facility's records was conducted on the same day, in the offices of Mr. Murphy.

CSSA is administrated by the Red River Army Depot (RRAD). The primary mission of CSSA is the receipt, storage, issue and maintenance of ordnance materiel, as well as quality assurance testing and maintenance of military weapons and ammunition. Due to the storage and testing of explosive ordnance, access to the installation is restricted. Operational buildings and storage magazines (igloos) are located within the inner cantonment, and the outer cantonment is primarily undeveloped open range (Attachment 1). CSSA also has an agreement with the U.S. Department of Agriculture (USDA) Agricultural Research Service which permits cattle grazing on CSSA land. CSSA personnel and/or retired personnel are allowed to hunt wildlife on a restricted basis. Although RRAD is proposed for realignment, no changes in the CSSA mission and military activities are expected.

GENERAL FACILITY AND WASTE PROCESS INFORMATION

CSSA is registered as an industrial small quantity generator (SQG) of hazardous waste with both the EPA (see EPA Internal Notifiers Report, Attachment 5) and the TNRCC (see Notice of Registration, Attachment 6). Although the generator quantity status appeared to be correct, the question of whether the facility was actually conducting industrial activities was raised during this inspection. Based upon the activities observed and the stated mission of CSSA as a supporting military installation, it would appear that the activities would be better classified as a municipal generator of solid waste. It is noted that some manufacturing and parts assembly activities are conducted; however, these are incidental to the weapons maintenance operations and not a primary waste generating process. This issue is addressed below as an Area of Concern with the recommendation to the facility operators to evaluate their generator type with regard to the best and most practicable means of managing the solid waste generated at the facility.

CSSA is also listed as a treatment/storage (T/S) facility in RCRIS and as a transporter of hazardous waste in both RCRIS and the EPA Internal Notifiers Report. The T/S listing in the enforcement log reflects the EPA's enforcement order for the unpermitted thermal treatment of waste munitions (characteristically reactive hazardous waste, D003) which were conducted at CSSA until 1987 in the open burning / open detonation (OB/OD) are (B-20). At present, B-20 is undergoing closure under a partial facility closure plan approved by the EPA and the TNRCC that was required by the original enforcement order issued on June 30, 1993 and revised following settlement of the violations and the issuance of a Consent Agreement and Consent Order (CACO) on May 21, 1996. It is noted that the transporter registration on the federal databases is not included on the facility's NOR with the TNRCC and that CSSA requested the removal of the transporter status from the NOR in a request submitted on January 26, 1995 (Attachment 7). Following this inspection, the facility operators were advised to

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997

Page 3

provide notification through the TNRCC to have the EPA registration information updated. This has been addressed below as an Area of Concern.

Most of the industrial activities are conducted as part of the weapons maintenance operations which are conducted in Building 90. This building is a large structure constructed in the 1930's as part of a WPA project. The building was used during World War II for munitions manufacturing and assembly. During the inspection of the waste generating and waste management areas building, the investigator was accompanied by Andy Ward (Shop Steward), Raymond Minor (Supervisor), Ralph Chavez (Supervisor of Pharmacy) and Mr. Murphy.

The weapons maintenance activities involve cleaning, testing and packaging for storage of various general issue firearms. The cleaning activities have recently changed to the use of non-chlorinated solvents. Most of the cleaning equipment and work areas are located along the west wall of the main operations area of the building. Two "vats" of Stoddard solvent and a single "vat" of Volatile Corrosion Inhibitor (VCI) are located at the northern end of the main operations area of the building (Photograph 1). A small bead blasting unit is located just to the south of the vats (Photograph 2). Satellite accumulation of waste streams from these units and for the dirty cloth rags generated by the cleaning activities are located in the center of the main operations area (Photograph 2).

A large and a small "Wet" washing system (Photograph 3) were both recently installed to replace a tetrachloroethylene (PCE) and trichloroethylene (TCE) degreasing system that had been built into the floor of the building. This old PCE/TCE degreaser had been operated from the 1950's until the present. The "foot print" of the old system was noted by the new concrete and paint on the floor. With regard to the removal and concreting of the floor where the old degreaser had been located, the facility operators indicated that no testing to detect the presence of contamination from the operation of the unit had been performed prior to filling the "pit" where the unit had been located. However, Mr. Minor stated that the former unit had been kept clean and that no leaks or spills had been allowed to collect in the "pit." It is noted that Building 90 is downgradient from Well #16 where groundwater contamination was detected in 1991. Although the activities previously conducted in Building 90 are not perceived to have contributed to the known groundwater contamination, the concerns of the San Antonio Region for the presence of contamination below Building 90 have been addressed below as an Area of Concern.

Test firing of weapons is conducted in a small room located on the east side of the main operations area in building 90. A modified door to a small chamber on the south wall of this room allows the tester to insert the weapon into the chamber. The south wall of the chamber is packed with sand to catch the bullets. The sand from this operation is generated as a solid waste only once or twice in a decade. The NOR currently lists a hazardous waste stream (NOR waste code 4006319H) as being generated by the indoor firing range.

On the east side of Building 90 are two support buildings, 90-1 and 90-2. Building 90-1 is the Bluing Shop where firearms are chemically treated to produce the jet-black finish on the metal parts. This

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 4

operation had not been conducted recently. Liquids remaining in the "bluing" tanks were observed to be low in volume and developing a layer of scale on the surface. Adjacent to the Bluing Shop (west side of Building 90-1) is a small shed where a Solvent Recovery System is located (Photograph 4). The system is a continuous feed recycling unit. Waste (solvent residues) generated by this system are classified as ignitable (D001) hazardous waste (waste code 4011609H).

Building 90-2 is identified as the "Sand Blast Shop." This building was observed to hold a wheelabrator (reportedly operational) and other equipment in storage, including sand blasting machines (reportedly no longer used). In addition to the equipment, satellite accumulation of the hazardous waste generated by the solvent recycling activities conducted in Building 90-1 was located in this building (Photograph 5). This drum was provided with a "hazardous waste" label and marked as "Solvent Wast(e) Residue." Two other red metal drums (one 30-gallon and the other 55-gallon capacity) were also located in this building. These other two drums were identified as spent solvent for recycling. These other drums were not labeled as "hazardous waste" but they did have dates indicating the start of accumulation. With regard to the investigator's questions as to whether the drums contained hazardous waste, Mr. Murphy indicated that drums contained spent solvent generated by the change-out of solvent from the vats located in Building 90 and that the Stoddard solvent used had a flash point of greater than 140 degrees Fahrenheit (NOR waste code 10022111). Following further discussion with the investigator, Mr. Murphy indicated that the solvent had been purchased from Safety-Kleen Corporation approximately three years ago and that CSSA had been recycling the solvent ever since that time. The investigator asked whether CSSA had ever tested the solvent for other constituents, noting that the spent solvent could be hazardous for other characteristics of hazardous waste besides ignitability. Mr. Murphy then indicated that he could not be certain that the spent solvents weren't a hazardous waste. Building 90-2 was not listed on the NOR as a waste management unit. Following verbal notification of the potential accumulation time violations, the 55-gallon drum of hazardous waste generated from the solvent recycling activities was relocated into the shed with the solvent recovery system in Building 90-1 and the two drums of spent solvent were relocated into Building 86 (NOR unit #002). Due to the possibility that the spent solvent generated by the change out of solvent from the vats in Building 90 were non-hazardous, this issue has been addressed below as an Area of Concern.

Inspection of the CSSA motor pool (Building 4) was conducted as a multimedia inspection. The other medias are used oil and used oil filter (as generator only). Copies of the completed inspection forms have been included as Attachment 8 to this report. With regard to the current activities conducted at the motor pool, Mr. Murphy explained that the CSSA vehicle fleet was now administrated under General Services Administration (GSA) contracts and as a result only tractors and machinery vehicles were being serviced at the motor pool. During the inspection of the motor pool, the inspection team was accompanied by Mr. Hubert Jones (Supervisor) and Cecil Noah (Assistant).

Wastes generated and/or handled by the motor pool included used oil, used oil filters, off-specification fuels (gasoline and diesel), used antifreeze, used tires, used absorbent and used rags. As noted in the used oil and used oil filter inspections, the containers of these wastes were observed to be properly

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 5

labeled and provided with secondary containment (Photograph 6). The container provided for the off-specification gasoline was noted to be provided with spark arresters, but these were not grounded. The used antifreeze is accumulated in a 55-gallon drum which was labeled as non-hazardous waste (NOR waste code 10052961). Used tires are generated from tractors and machinery vehicles only. Absorbent used in the general clean up of small spills is accumulated in a 55-gallon drum which is labeled as non-hazardous waste. It is noted that the waste code for the waste absorbent is described as "spent solid filters or adsorbents / Waste oil filters from motor pool" (NOR waste code 10063101). The used rags generated from other area of CSSA are all collected at the motor pool as a centralized point for pick-up by the laundry service.

Adjacent to the motor pool is CSSA's paint booth building. This building is currently closed by order of the Commander. The former operator of the paint booth recently retired and the Commander has decided to discontinue the painting activities previously conducted in the building until some undetermined date in the future.

Building 40 is the former less than 90 day hazardous waste storage area which is currently being closed by the facility operators. At present the inside of the building is prepared for wipe sampling of the concrete floor to determine whether releases occurred while it was in use (Photograph 7). The building is located off of Tompkins Road approximately one-half mile north of Building 90. Building 40 is a single structure approximately 15 feet by 30 feet (Photograph 8). Although Mr. Murphy indicated that notification of this building as a solid waste management unit (SWMU) had been made to the TNRCC, the building is not listed on the current NOR. Review of the facility files revealed that notification forms had been completed identifying the building as NOR unit #001, however, it is not certain whether the form was actually submitted to the TNRCC with the other submittals sent on January 26, 1995 (Attachment 7). This issue has been addressed below as an Area of Concern.

Building 86 is the current less than 90 day hazardous waste storage area operated by the facility. This was a four (4) compartment white metal storage unit (Photographs 9 and 10) located south of Building 90 and to the east of Warehouse 93 (Pharmacy Building). Although the building is not equipped with a telephone, the names of the emergency coordinators are posted on the front (east side) of the unit (Photograph 11). It is noted that the CSSA personnel are provided with radios and/or cellular phones and that the nearest telephone is located in the Pharmacy area of Warehouse 93. Building 86 is equipped with a fire suppression system that currently uses a dry powder chemical but the facility operators plan to provide water to the building for this system. When the building was initially inspected during the site inspection, no hazardous waste was being stored in any of the compartments ("cells"). At that time, Cell #1 held two (2) 30-gallon metal drums of lacquer thinner, and Cell #2 held a 55-gallon metal drum of car wash sump waste (NOR waste code 20066092) and a 50-gallon plastic drum of citrus based cleaner (NOR waste code 10122191).

Further review of the lacquer thinner observed in Building 86, Cell #1 has revealed that the product (Crown Lacquer Thinner) contains over 10 per cent by volume each of acetone, methyl ethyl ketone and

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997

Page 6

toluene (Attachment 9). Based upon this information it is believed that the facility operators should have been managing the spent solvent waste stream generated from the use of the lacquer thinner as a listed hazardous waste (F003 and F005) and not awaiting receipt of analytical results for that determination. Upon verbal notification on August 20, 1997 of the requirement to have made the hazardous waste determination on the waste stream generated by use of the lacquer thinner as a solvent, Mr. Murphy provided a copy of the material safety data sheet (MSDS) for the product and a copy of the STEERS waste stream notification record for the new waste stream as waste code 4018209H (Attachment 9). As a result of this finding and the response taken by the facility operators, this issue has been addressed below as a violation alleged and resolved in the current inspection.

The Pharmacy Building (Warehouse 93) is located to the south of Building 90. Non-hazardous recyclable materials are accumulated in the main part of the warehouse; these include paper, cardboard, plastic, styrofoam, glass and (light) metals. The CSSA Pharmacy is the centralized distribution and receiving office for all hazardous material products and for all wastes generated by the facility's "normal" activities, with the exception of the dirty rags, used oil, used oil filters, used antifreeze and used tires which are handled through the motor pool.

Satellite accumulation for a single waste stream (NOR waste code 4013219H) was observed in the Pharmacy area. This was a waste stream of paint and thinner which had been previously generated at various locations throughout CSSA by disposal of spray paint cans through use of aerosol can emptying devices. Prior to the implementation of the pharmacy system, these aerosol can emptying devices were located on the facility at an "as needed" basis. Each device consists of a 5-gallon plastic bucket located below a small stand on which is fitted a piston which empties and punctures the aerosol can, draining the residues into the bucket. Since the implementation of the pharmacy system, these emptying devices have been located in the Pharmacy area with a 55-gallon drum (Photograph 14) into which the smaller buckets are emptied. At the time of this inspection, the 55-gallon drum was approximately half-full. Due to the potential for accumulation of greater than 55 gallons of the hazardous waste stream at a single time, the investigator advised the facility operators to consider alternatives, such as eliminating all but one aerosol emptying device or replacing the 55-gallon drum with a smaller (i.e., 30 gallon) drum. It is noted that the 55-gallon drum currently provided had been stenciled with the words "satellite accumulation area" following the investigator's comments earlier that day regarding the satellite accumulation of the residues generated from the solvent recycling unit (NOR waste code 4011609H). The issue of satellite accumulation quantities and the potential for exceeding the 55 gallon limit has been addressed below under the Area of Concern regarding the satellite accumulation of hazardous wastes noted in Building 90-2.

The incorporation of the pharmacy system was reported to have greatly reduced the quantities of products in storage at the facility, which in turn has resulted in the reduction of solid waste generated by the facility's "normal" activities. As part of the pharmacy system, CSSA is preparing to implement a new computerized hazardous substance management system (HSMS) which has been designated for implementation in all DOD installations (except for the Air Force which is implementing another

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997

Page 7

system). Following the site inspection, the HSMS was demonstrated to the investigator, although it was not completely operational. When complete, the system will track all purchases, quantities in stock and disposal of hazardous materials, and it will also provide information for Tier II and Tier III reporting requirements.

Following the site inspection, the facility's records of hazardous waste and Class 1 solid waste management activities were reviewed. These records included the NOR, manifests, land disposal restriction notifications, waste minimization plan and closure plan for Building 40 (CSA #001), as well as personnel training documentation. At this time, Mr. Murphy provided the investigator with a copy of the "Hazardous Waste Management Plan (November 1996)," which included the "Installation Spill Contingency Plan" and "Spill Prevention, Control, and Countermeasures Plan" (Attachment 10).

Review of the NOR for CSSA (SWR No. 69026) found that the county location for the facility had been changed from Bexar County to Kendall County sometime after 1995. The reason for this change was not known to the facility operators. It is noted that the address for Boerne and the zip code for the address may have resulted in the change by automated means in the TNRCC database. It is also noted that the contact listed on the NOR for the facility is the former Commanding Officer (Lt. Col. Dean Schmelling). Review of the EPA internal notifiers report (INR) and RCRIS log for CSSA found that the INR identifies the facility location in Kendall County with an old mailing address (P.O. Box 690627, San Antonio, 78269) and both the INR and the RCRIS log identify CSSA as a transporter (of hazardous waste). It is noted that CSSA had previously requested the transporter designation removed from the TNRCC NOR in a registration update submitted on January 26, 1995 (Attachment 7). The correction to the RCRIS log has been addressed in a Universal Tracking Request (UTR) form (Attachment 11). The other notification issues have been addressed as an Area of Concern with the recommendation that the facility operators correct the state and federal notification information.

During the record review, the investigator noted that some manifests (Texas State Document Numbers 01049924, SKC-40642, 1053608 and 934876) were present without accompanying Land Disposal Restriction (LDR) notifications. When this was mentioned, Mr. Murphy called the disposal companies (Texas Ecologists, Inc. for manifest number 01049924, see Attachment 12, and Safety-Kleen Corp., Denton, for manifest numbers SKC-40642, 1053608 and 934876) and copies of the LDR notification forms used for the shipments were faxed to CSSA (Attachments 12 and 13). It is noted that the LDR notification faxed from Texas Ecologists, Inc. to Mr. Murphy during the inspection included a fax note used by Mr. Murphy to fax the notification to Texas Ecologists, Inc. prior to the shipment of the waste. As result of this observation, it was considered that the original LDR notification form for that shipment and the three shipments to Safety-Kleen Corp. may be located elsewhere in the CSSA files. As a result of this observation, this issue has been addressed below as an Area of Concern.

Further review of the manifest records found that the signed (original) copy of Texas State Manifest Document Number 00946450 was not present (Attachment 14). This manifest had been used for a shipment of waste munitions shipped on October 19, 1995 to the adjoining military installation, Camp

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 8

Bullis, for disposal in that facility's interim status Explosive Ordnance Detonation (EOD) Range (proposed permit number HW-50335). This shipment had been previously discussed between the investigator and Mr. Murphy at the time of the shipment due to Mr. Murphy's concerns regarding the proper net explosive weight for the shipment and the impact that the shipment had on the generator quantity status of CSSA. At that time, the investigator had indicated that the shipment of the munitions as waste may have been better handled differently so as to negate the need for the manifest, especially since the two military installations share a contiguous border and the munitions were not transported on public roads. However, as Mr. Murphy had noted, the munitions had been removed from storage at CSSA by Camp Bullis personnel and the manifest had been used prior to the contact of the San Antonio Region by Mr. Murphy. It is also noted that this shipment had been an issue during the 1996 CEI conducted at Camp Bullis. Review of the manifest copied in the 1996 CEI for Camp Bullis found that the manifest had not been signed by an agent of the designated facility (Attachment 15). This had been an oversight of the investigator during that 1996 CEI as other issues were being addressed. Upon review of this manifest in the current inspection of CSSA, the facility operators were advised to submit an exception report for that manifest in compliance with the requirements of 30 TAC §335.13(d)/ 40 CFR §262.42 (relating to Exception reporting). An exception report for this shipment was received via fax on August 6, 1997 and via mail on August 8, 1997 (Attachment 16). Additional documentation received by CSSA from the operators of the Camp Bullis EOD Range was also received via fax on August 7, 1997 (Attachment 17). Since it is noted that at the time of this shipment of waste munitions the military munitions rule had already been proposed, and since the preamble of those rules indicated that the original intent of the regulations was not to require manifesting of waste (munitions) between facilities that share a common border, no violations have been alleged at this time, but this issue is addressed below as an Area of Concern.

Review of the facility's waste minimization records included a Waste Minimization Study Report, dated June 1995. CSSA had also submitted an executive summary and Certification of Completeness and Correctness on April 16, 1996 (Attachment 18). Although this submittal was acknowledged as being made after the deadline for SQG facilities, no violation has been alleged as of this time.

Following the record review, the investigator toured the solid waste management units which are undergoing closure. These included unit B-20, the former open burn / open detonation range which was the subject of the Consent Agreement and Consent Order (CACO) which was originally issued on June 30, 1993 and subsequently revised on May 21, 1996. At present these sites were partially cleaned up; B-20 was cleared of all vegetation and has been swept for unexploded ordnance (UXO) on at least two occasions. Requests for permission to blow-in-place (BIP) the UXO was requested by CSSA of the TNRCC and granted on January 29, 1996 (Attachment 19) and the UXO was detonated on-site on May 8, 1997. A second request to BIP UXO was submitted on February 19, 1997 (Attachment 20), and the activity has been conducted. Following the removal of the UXO, the site was sifted to remove ordnance, shrapnel and scrap metal fragments from areas of the site. Sifting was conducted between April 14 and May 19, 1997. In accordance with Item 37.C. of the revised CACO, Mr. Murphy has been submitting quarterly progress reports regarding the activities conducted as required by the CACO.

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997

Page 9

The most recent of these reports was received by the San Antonio Region on July 9, 1997 (Attachment 21).

During the site tour of these SWMUs, the investigator observed that the sites which had been sifted (including B-20) had stockpiled soils and scrap metal which was described as waste to be disposed. Regarding the stockpiled material observed stored at B-20, Mr. Murphy had indicated that the waste would probably be stabilized on-site for the purpose of economic disposal at a local landfill. Although Mr. Murphy did not indicate that he considered the material to be a generated waste, the investigator did note that the material was stored on plastic that was not in good condition and there was no cover provided for the stockpile. Regarding the final clean up of the site and the stockpile in particular, Mr. Murphy indicated that additional verification sampling of the soils at B-20 would be performed prior to completion of the partial facility closure activities required under the CACO with the EPA. With regard to the potential generation of hazardous waste (lead contaminated scrap metal - i.e., bullets, D008) from the SWMU closure activities, Mr. Murphy had indicated that he did not consider that waste as part of CSSA's hazardous waste generation quantity for purposes of determining the generator status (i.e., LQG vs. SQG). As a result of Mr. Murphy's comments regarding CSSA's intent to stabilize the stockpiled material at B-20 prior to off-site disposal and the indication that stockpiled wastes from the SWMU clean up activities may not be addressed by the facility operators, concerns regarding the status of the material as a waste have been raised. These issues have been addressed below as an Area of Concern.

ADDITIONAL INFORMATION

In addition to the closure of B-20, the unpermitted open burn / open detonation (thermal treatment of waste munitions) solid waste management unit (SWMU), CSSA is currently conducting remediation activities at 26 other SWMUs located throughout the installation. Most of these SWMUs are located outside of the containment area (Figure 1, Attachment 1). A Work Plan (Attachment 22) and Sampling Analysis Plan for SWMU closure of these units was submitted on February 29, 1996. These plans addressed the status and proposed activities for the 26 sites at that time, including the delisting of another two (2) previously identified "low priority" SWMUs. One of the highest priority SWMU is unit O-1, a former oxidation pond (surface impoundment) that reportedly only received office waste generated at CSSA. Investigation of this unit following the detection of chlorinated solvents in a downgradient drinking water well, has found high concentrations of tetrachloroethylene (Attachment 23) in the soils of the unit. These concentrations indicate that hazardous waste remains contained in the soils of the unit. At the time of this inspection, a treatability study was prepared to start the following week using electrodes and acid (a mixture of hydrochloric and citric acids) to treat the organic solvents in place by electrolytic induction. Another high priority SWMU was B-3, a former garbage disposal and trash burning site. This unit was also found to have high concentrations of soil gases (tetrachloroethylene, trichloroethylene and dichloroethylene). At the time of this inspection, a soil vapor extraction (SVE) system was set up and running. Other high priority sites include B-24 and B-28. At the time of this inspection, excavated soils at B-28 had been sifted and sifting was on-going at B-24.

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 10

It is noted that although many of these SWMUs were reportedly active during the 1980's, none of these sites have been listed on CSSA's NOR. In discussions with Mr. Murphy, he indicated that the SWMUs would only be listed on the NOR should they not achieve closure under Risk Reduction Standard No. 1, and therefore require deed recordation. The investigator expressed concern regarding the inclusion of these units on the NOR, especially B-20 since that was documented as having been operated up until 1987. In addition, review of the San Antonio Region files has found that CSSA closed a former less than 90 day hazardous waste management unit in 1995 (Attachment 24) without having that unit included on the NOR. This issue has been addressed below in the Area of Concern regarding the notification of the "old" less than 90 day container storage area ("NOR" unit #001).

In addition to the SWMU's being addressed by CSSA, facility Well 16 was found to be contaminated by tetrachloroethylene, trichloroethylene and dichloroethylene in 1991. Information from the San Antonio Region files regarding the detection on August 9, 1991 and confirmation sampling on August 23, 1991 which found contamination in Well 16 has been included as Attachment 25 to this report. Following notification of the San Antonio office of the Texas Water Commission, samples of groundwater were collected by San Antonio Field Investigator Malcolm Philip Bynum on December 4, 1991 from Wells 16, 4 and D, and those results have also been included in Attachment 25. A summary of the sample results for sampling conducted by both CSSA and the San Antonio office have been provided in Table 1, below.

Well	Sample date	Sample collector	DCE ($\mu\text{g/L}$)	TCE ($\mu\text{g/L}$)	PCE ($\mu\text{g/L}$)
16	August 9, 1991	CSSA	127.0	151.0	137.0
16	August 23, 1991	CSSA	69.0	509.0	196.0
16	December 4, 1991	M. P. Bynum	84	29	54
4	December 4, 1991	M. P. Bynum	<2	<2	<2
D	December 4, 1991	M. P. Bynum	43	46	28

BACKGROUND

On October 19, 1995, the investigator attended a meeting at CSSA with Mr. Guy Tidmore of the EPA Region VI office and Mr. Richard Clarke and Mr. Luis Campos of the TNRCC I&HW Closure Team. At that time, Mr. Murphy and representatives of their consultants (Engineering Science) presented information regarding CSSA's actions to comply with the June 30, 1993 Complaint and the facility's actions taken in response to the detection of chlorinated solvents in groundwater (Well 16). Among the information presented were copies of two (2) slide show explanation documents, one for the "B-20 Former Open Burn / Open Detonation Closure Activities" (Attachment 26) and the other for the "Groundwater Evaluation Project" (Attachment 27). These documents included copies of the slides used

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997

Page 11

in the presentation and notes to explain certain issues and/or items addressed in the slides. After discussions of the presentations, it was decided that the B-20 closure activities were to continue as proposed for closure under Risk Reduction Standard 1 with the submittal of a revised plan which addressed the investigation of unexploded ordnance (UXO) and the removal of scrap metal from the site; however, the facility operators were unsure of the cost effectiveness of cleaning the entire site to background levels of metals, especially lead. With regard to the ground water contamination, the facility operators had identified at least two potential sources of contamination, an oxidation pond (O-1) and an old "office waste" landfill (B-3). With regard to O-1, this unit has been addressed in this report as a surface impoundment due to the high concentration of tetrachlorethylene contained in the soils of the unit. Although Mr. Tidmore had advised excavating these potential sources, it is noted that at the time of this CEI the wastes remain in-place and the facility operators have chosen to install a soil vapor extraction system at B-3 and to set up a test of new treatment technology at O-1. During the October 1995 meeting, the placement of a monitor well downgradient from Well 16 was also discussed, with the advice of Mr. Tidmore to locate the monitor well closer to Well 16 than was initially proposed by the facility operators. The completion of this well was not addressed during this inspection.

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(h) - 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.

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 12

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 (Attachment 9). 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 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 (Attachment 24) 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

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 13

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 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

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 14

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. 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

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997

Page 15

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 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

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

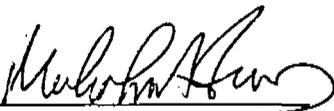
August 21, 1997
Page 16

while the unit was in operation. However, the investigator indicated that very little spillage or leakage could result in contamination of the existing concrete and possibly further contamination of the soils underlying the building. To this the facility operators indicated 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.

ENFORCEMENT

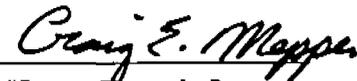
The facility operators have been notified in writing of the results of this inspection in a general compliance letter sent from the San Antonio Region on August 21, 1997 (Attachment 28). Due to the alleged and resolved violation and the nature of the Areas of Concern, the facility operators have been requested to respond in writing within 30 days of the receipt of that letter, in particular with regard to the response on the status of materials observed stockpiled on-site and the hazardous waste determination requirement for all solid wastes generated at the facility site.

Signed



Malcolm A. Ferris
Field Investigator

Signed

 Date 08/21/97

Henry Karnei, Jr.
Waste Program Manager

HK-MF/maf

Attachments

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 17

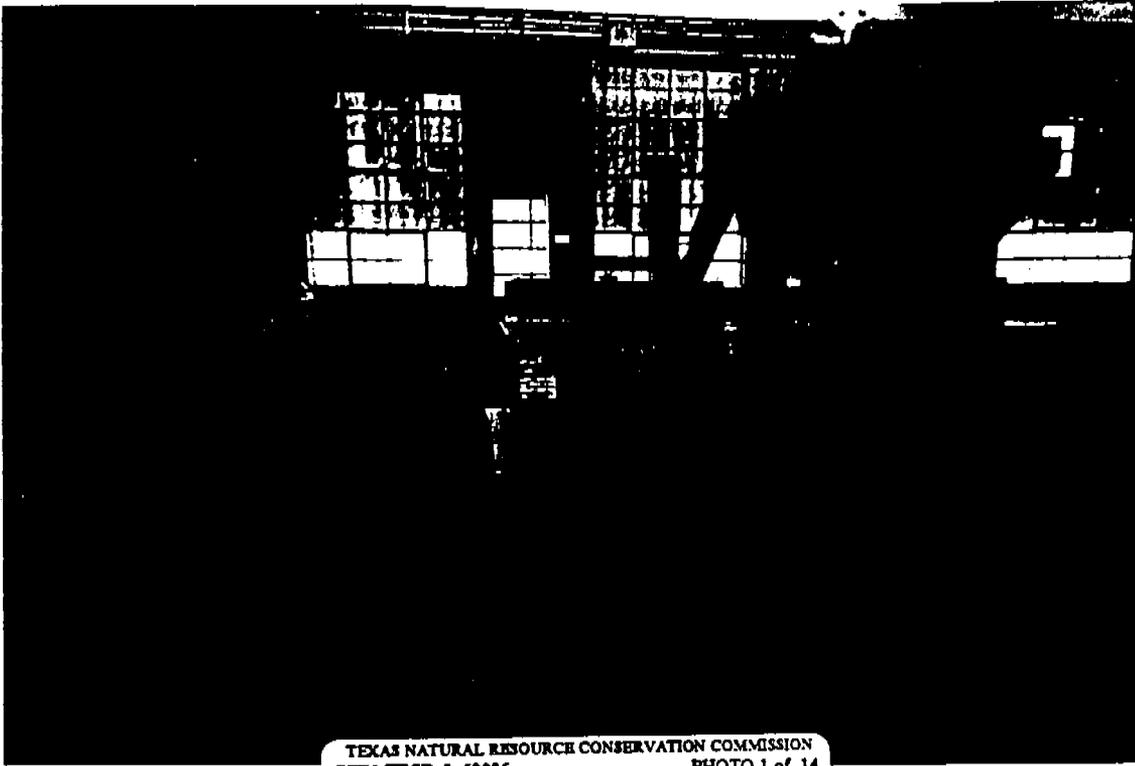
LIST OF ATTACHMENTS

- Attachment 1 Facility Site Location Map - provided by CSSA on August 6, 1997. (1 pg.)
- Attachment 2 Investigator's field notes. (6 pgs.)
- Attachment 3 RCRIS log for CSSA, printout dated June 10, 1997. (1 pg.)
- Attachment 4 Consent Agreement and Consent Order issued by EPA on May 21, 1996. (74 pgs.)
- Attachment 5 EPA Internal Notifiers Report, printout dated June 10, 1997. (1 pg.)
- Attachment 6 Notice of Registration, SWR #69026, printout dated August 6, 1997. (10 pgs.)
- Attachment 7 "Changes to Notice of Registration (NOR) #69026" submitted to TNRCC on January 26, 1995. (9 pgs.)
- Attachment 8 Used oil and Used oil Filter Inspection checklists and attachment. (8 pgs.)
- Attachment 9 Waste stream notification and Material Safety Data Sheet for Crown Lacquer Thinner. (4 pgs.)
- Attachment 10 "Hazardous Waste Management Plan, November 1996" provided by CSSA on August 6, 1997. (339 pgs.)
- Attachment 11 Universal Tracking Request form. (1 pg.)
- Attachment 12 Texas State Manifest Document Number 1049924 and LDR notification form. (5 pgs.)
- Attachment 13 LDR notification forms received by CSSA from Safety-Kleen. (4 pgs.)
- Attachment 14 Texas State Manifest Document Number 946450. (1 pg.)
- Attachment 15 Texas State Manifest Document Number 946450 from Camp Bullis 1996 CEI. (1 pg.)
- Attachment 16 "Exception Report for Manifest 00946450" received from CSSA on August 8, 1997. (1 pg.)
- Attachment 17 "Documentation for Manifest 00946450" received by CSSA from Camp Bullis. (6 pgs.)
- Attachment 18 "Source Reduction and Waste Minimization Plan" and "Certification of Completeness and Correctness" submitted by CSSA on April 16, 1996. (10 pgs.)

Subject: Camp Stanley Storage Activity, 25800 Ralph Fair Road, Boerne, Texas 78015
TNRCC SWR# 69026; EPA ID# TX2210020739
Compliance Evaluation Inspection of August 6, 1997
Sampling Inspection of December 4, 1991 and Reporting of Analytical Results
Bexar County

August 21, 1997
Page 18

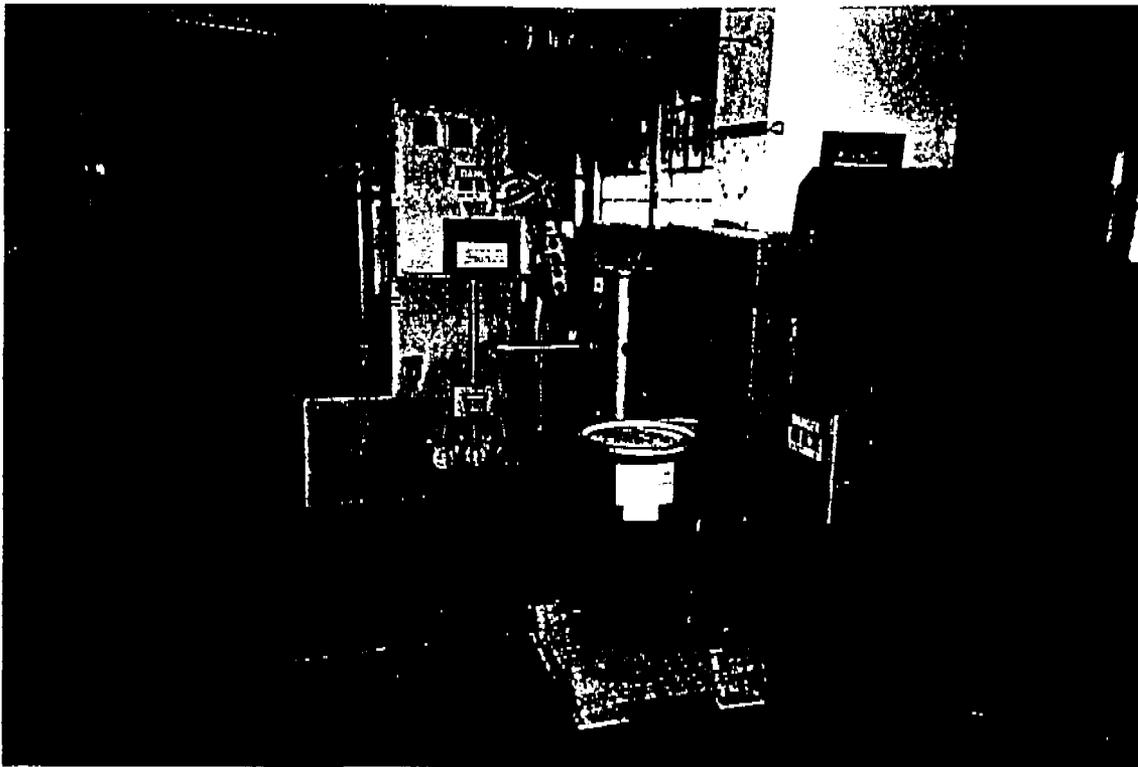
- Attachment 19 "Interim Approval to Begin "Blow-In-Place" Destruction of Unexploded Ordnance," dated January 29, 1996 (1 pg.)
- Attachment 20 "Request for Blow-In-Place of Unexploded Ordnance Found," dated February 19, 1997. (1 pg.)
- Attachment 21 "CACO for RCRA VI-310-H, Camp Stanley Storage Activity, SEP No. CSSA-02, Environmental Specialist," quarterly report for April - June 1997, submitted July 9, 1997. (13 pgs.)
- Attachment 22 "Work plan and sampling analysis plan for closure of solid waste management units (SWMUs) at Camp Stanley Storage Activity (CSSA), Texas," cover pages and Section 1, dated February 29, 1996. (17 pgs.)
- Attachment 23 "Distribution of Tetrachloroethylene in Soil Gas at the Oxidation Pond 1," Figure 3.13 from "Work Plan for SWMU Closures at Camp Stanley Storage Activity Boerne, Texas," dated February 1996. (1 pg.)
- Attachment 24 **Closure** documentation for former less than 90 day hazardous waste storage area "F-14." (16 pgs.)
- Attachment 25 Documentation from San Antonio Region file on initial discovery of chlorinated solvent contamination in groundwater at Well 16 and subsequent sampling of well 16, 4 and D by San Antonio Region Investigator Malcolm Philip Bynum. (21 pgs.)
- Attachment 26 "B-20 Former Open Burn / Open Detonation Area Closure Activities" received on October 19, 1995. (32 pgs.)
- Attachment 27 "Groundwater Evaluation Project" received on October 19, 1995. (78 pgs.)
- Attachment 28 General Compliance letter to CSSA for CEI of August 6, 1997. (8 pgs.)



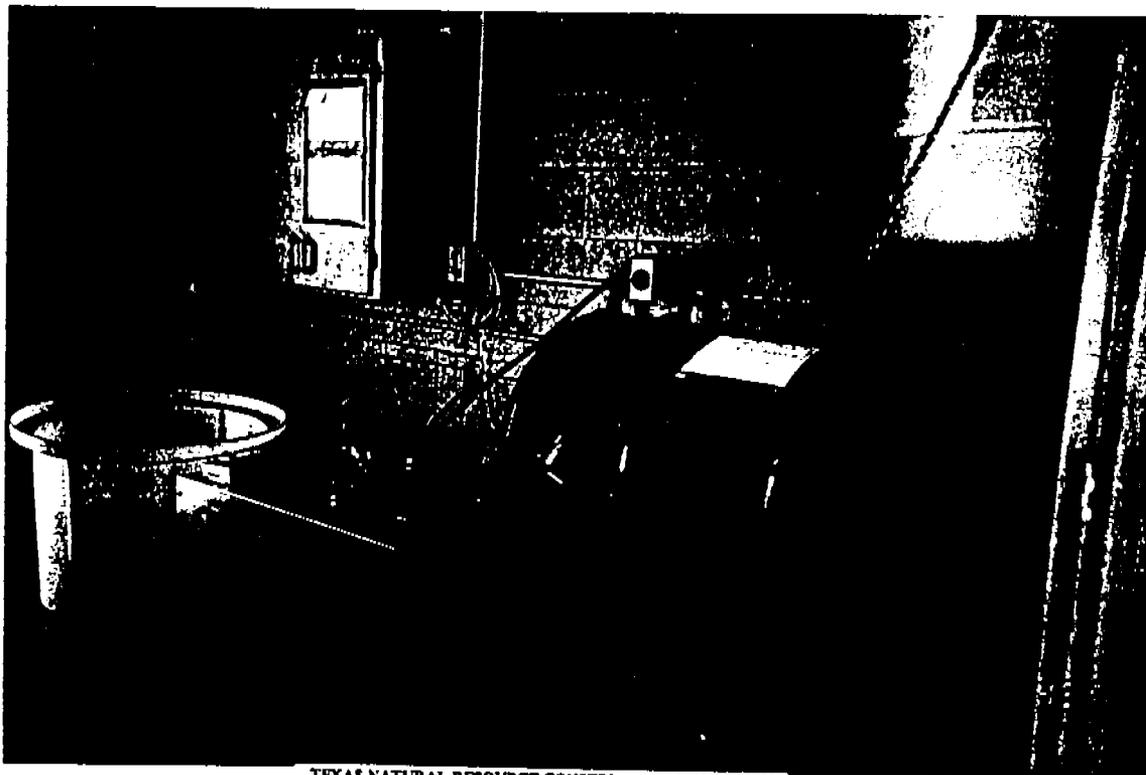
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026 PHOTO 1 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerne Bexar County DATE: August 6, 1997
COMMENTS: Building 90. Solvent vat and Volatile
Corrosion Inhibitor (VCI) tank located against west wall of
building. Spill kit in overpack to left. "EPN" marking on
vats for EPA Commission point number).



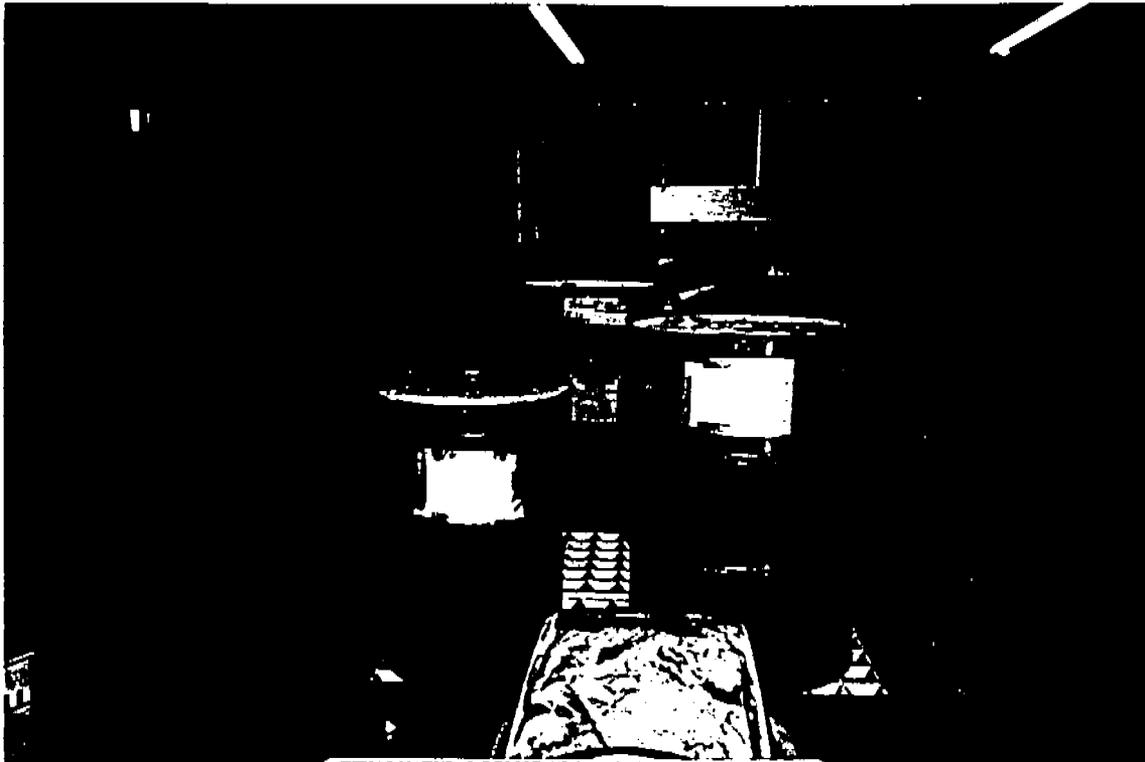
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026 PHOTO 2 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerne Bexar County DATE: August 6, 1997
COMMENTS: Building 90. Satellite accumulation for
various waste streams. Red 30-gallon drum for "Spent
Solvent for recycling." Plastic container to right for dirty
rags. Small bead blaster located against west wall.



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026. PHOTO 3 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerne Bexar County. DATE: August 6, 1997.
COMMENTS: Building 90. "Wet" wash units located against
west wall. Satellite accumulation of waste residues at center.
Gray floor area reported to be former location of "pit" of old
degreaser unit (PCE/TCE).



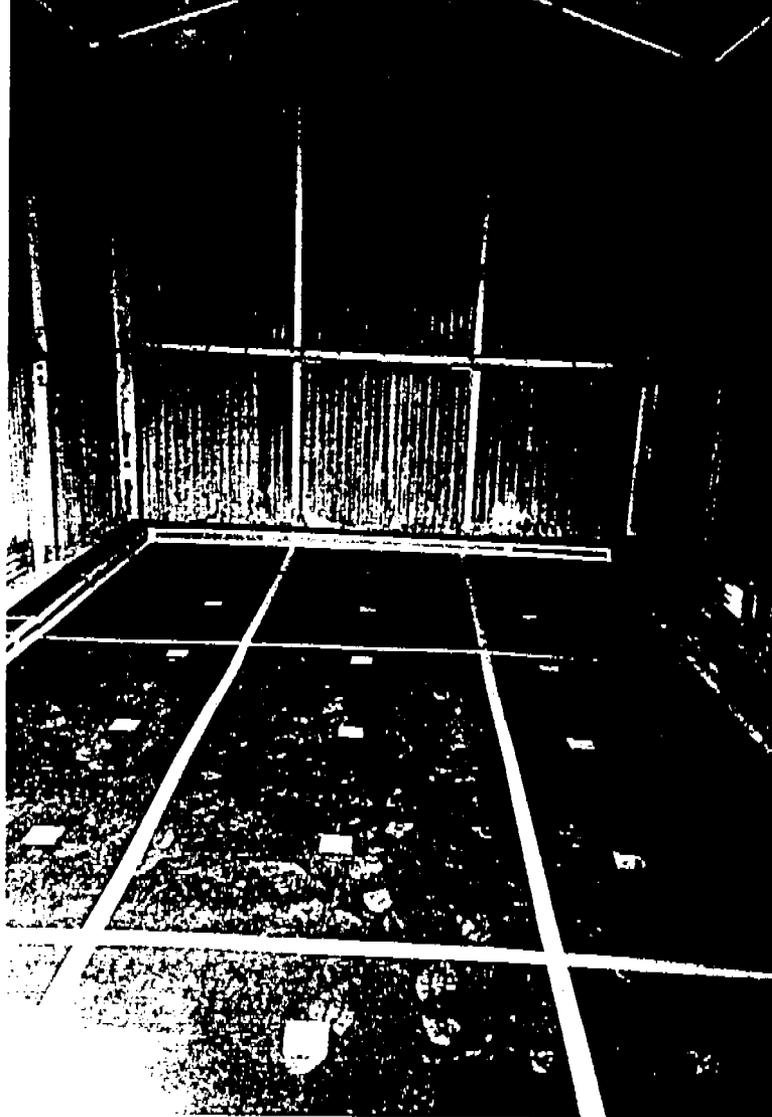
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026. PHOTO 4 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerne Bexar County. DATE: August 6, 1997.
COMMENTS: Building 90-1. Solvent Recovery System and
ancillary equipment located against east wall of bump-out
shed on west side of Building 90-1 ("Bluing Shed").



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
 PERMIT/ID #: 69026. PHOTO 5 of 14
 SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
 Road Boerne Bexar County. DATE: August 6, 1997
 COMMENTS: Building 90-2. Two (2) drums of spent
 solvent located in front of satellite accumulation of waste
 residues generated by Solvent Recovery System (black 55-
 gallon drum). Old sand blast units at rear of view.

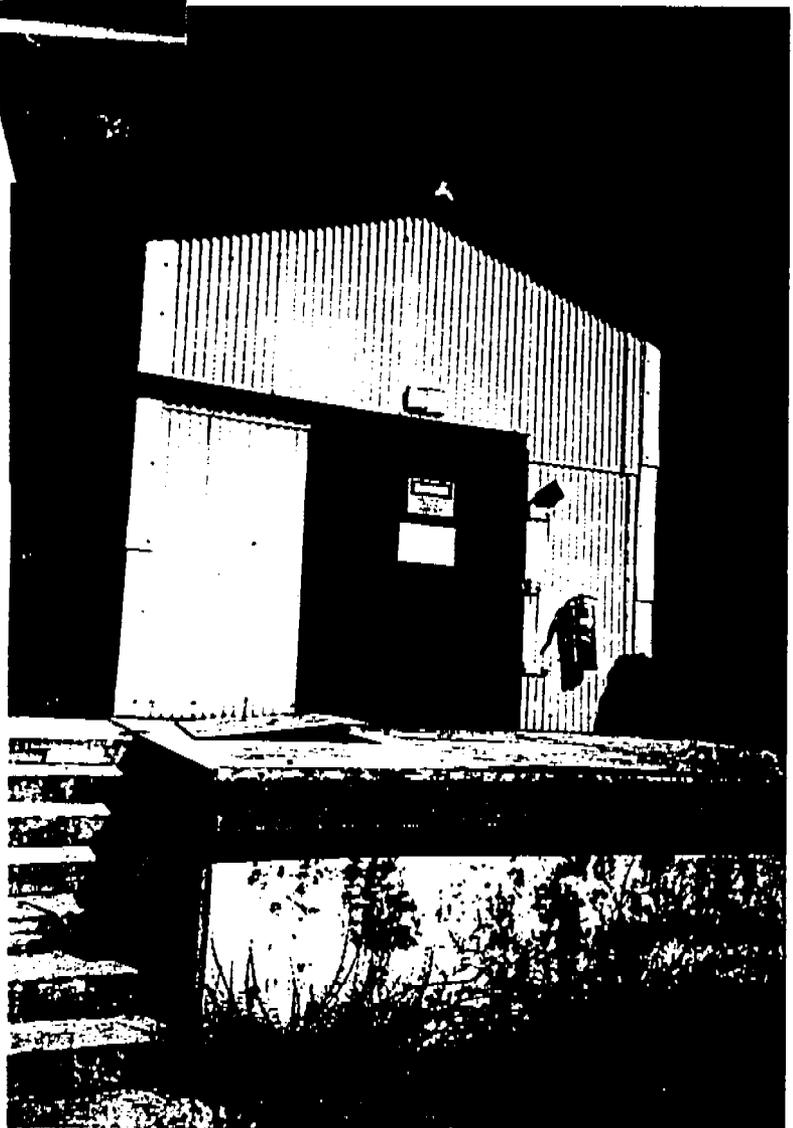


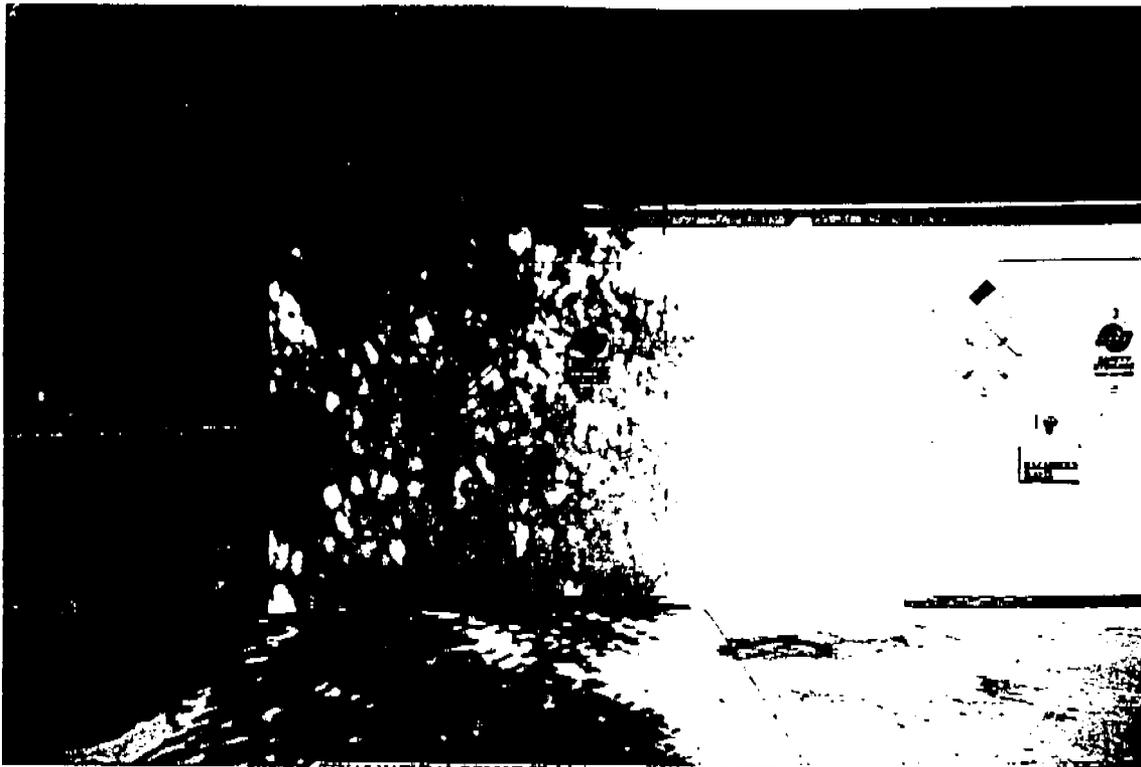
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
 PERMIT/ID #: 69026. PHOTO 6 of 14
 SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
 Road Boerne Bexar County. DATE: August 6, 1997
 COMMENTS: Building 4. Used oil and used oil filters on
 containment pallets. Spent diesel and off-spec gasoline in
 black drums to left each used oil/filter drum (gasoline to far
 left). Used oil filter press located on wall between pallets.



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026 PHOTO 7 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerne Bexar County DATE: August 6, 1997
COMMENTS: Building #0 Former <90 day hazardous
waste container storage area (NOR unit #001). Interior
covered with cardboard and gridded for wipe sampling of
floor to verify for closure.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026 PHOTO 8 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerne Bexar County DATE: August 6, 1997
COMMENTS: Building #0 Exterior of former <90 day
hazardous waste container storage area. Loading dock and
sliding door located on east side of building.

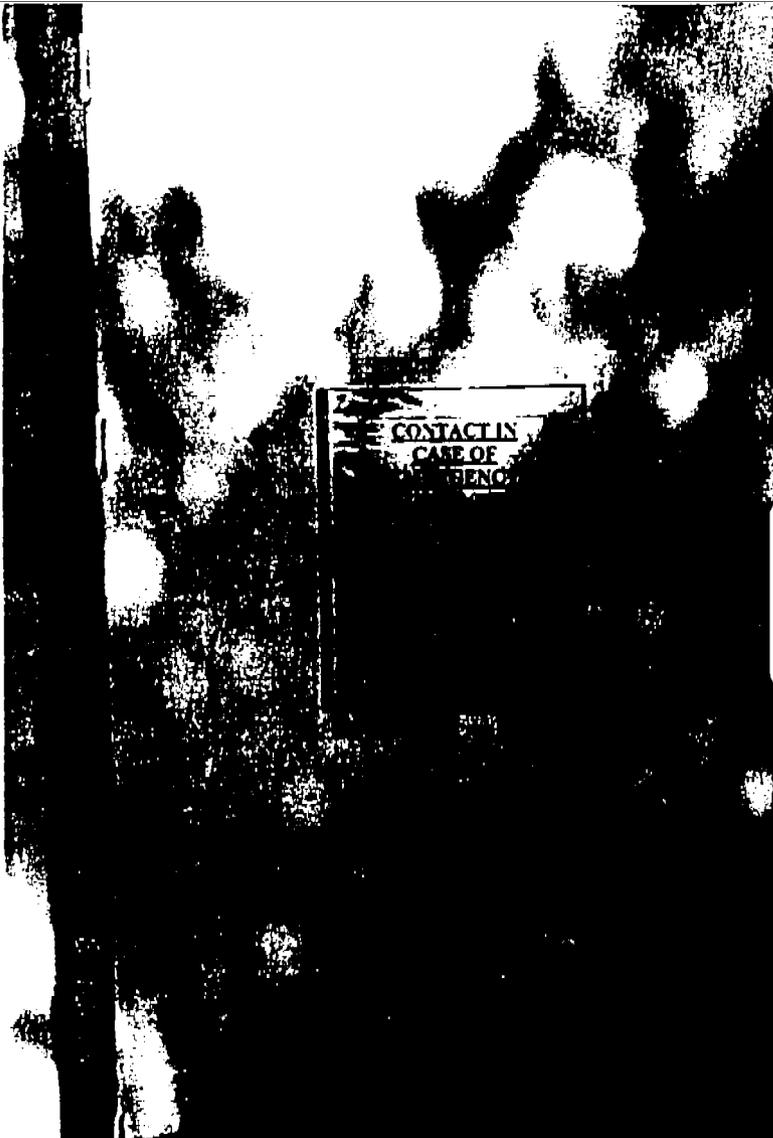




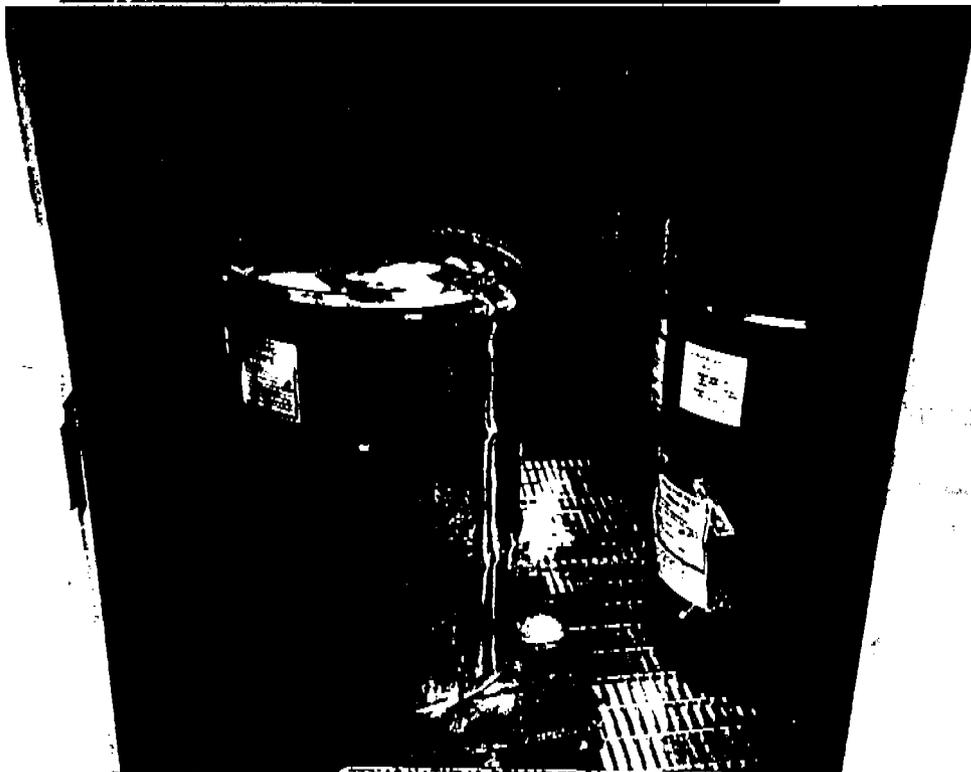
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026 PHOTO 9 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerna Bexar County DATE: August 6, 1997
COMMENTS: Building 86 - New storage unit for <90-day
accumulation of hazardous waste (NOR unit #002). View of
east side of building showing doors to Cell 3 (right) and 4
(left).



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026 PHOTO 10 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair
Road Boerna Bexar County DATE: August 6, 1997
COMMENTS: Building 86 - New storage unit for <90-day
accumulation of hazardous waste. View of east side of unit
showing doors to Cells 1 (far right), 2 (open for inspection
at right) and 3 (left).



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026. PHOTO 11 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair,
Road Boerne Bexar County. DATE: August 6, 1997
COMMENTS: Building 86. New storage unit for <90-day
accumulation of hazardous waste. Emergency contact phone
numbers posted in between doors to Cells 2 and 3 on east
side of unit.



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PERMIT/ID #: 69026. PHOTO 12 of 14
SUBJECT: Camp Stanley Storage Activity 25800 Ralph Fair,
Road Boerne Bexar County. DATE: August 6, 1997
COMMENTS: Building 86. New storage unit for <90-day
accumulation of hazardous waste. Interior of Cell 2 showing
storage of non-hazardous waste (car wash sump grit to left
and citric acid cleaner to right).



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
 PERMIT/ID #: 69026 PHOTO 13 of 14
 SUBJECT: Camp Stanley Storage Activity 25800 Ralph Estr.
 Road Boerne Bexar County. DATE: August 6, 1997
 COMMENTS: Building 86. New storage unit for < 90-day
 accumulation of hazardous waste. Interior of Cell 1 showing
 storage of lacquer thinner (possibly Class 1 or hazardous
 pending receipt of sample analysis).

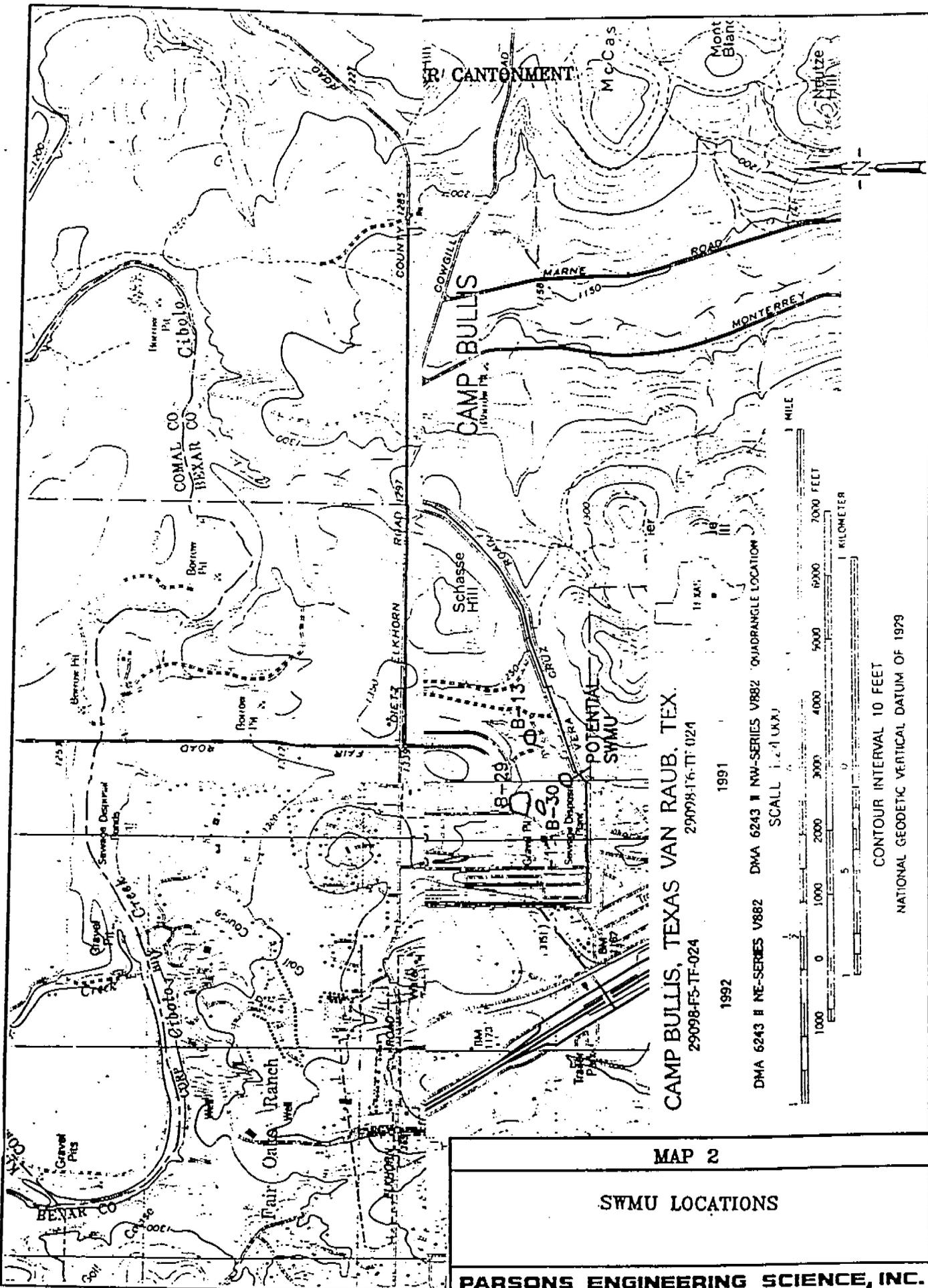


TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
 PERMIT/ID #: 69026 PHOTO 14 of 14
 SUBJECT: Camp Stanley Storage Activity 25800 Ralph Estr.
 Road Boerne Bexar County. DATE: August 6, 1997
 COMMENTS: Warehouse 93. Pharmacy area. Satellite
 accumulation of hazardous waste (4013219H).

Subject: Camp Sludge Storage Area
25000 Ralph Fair Road Beane
Bexar Co.

TNRCC SWR# 68024 EPA ID # TX2210020139
Compliance Evaluation Inspection of August 6, 1997

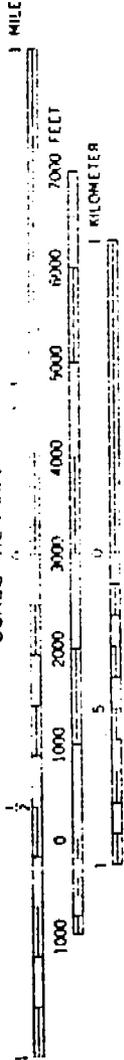
XREF: BASE



CAMP BULLIS, TEXAS VAN RAUB, TEX.
29098-F5-TF-024
29098-F6-TT-024

1992
1991

DMA 6243 II NE-SERIES V882 DMA 6243 II NW-SERIES V882 QUADRANGLE LOCATION
SCALL 1:24,000



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1979

MAP 2

SWMU LOCATIONS

PARSONS ENGINEERING SCIENCE, INC.

— October 19, 1995 — MAF ^{8/15/97}

10:55 Called Steven Pierce

fax 214 494-6973

- faxing NOR w/ covr of items to address/change/update
 & fax info/Rob to Steven Pierce

12:1 lunch

1:05 hr. HR for Camp Stanley

1:42 hr. Camp Stanley - security at gate - escort to Bldg

1:45 Mtg: - Commanding Officer (CSSA)

Rod Chapman - Environmental (CSSA)

Brian Murphy - Environmental (CSSA)

Susan Roberts - Parsons ES.

Richard Clarke - TNRC

Luis Campos - TNRC

Guy Tidmore - EPA, Chief Engr

Renee - AF CRE

Paul Oliver - Camp Stanley Storage Activity

Tom Tutwiler - CSSA

rec'd plan for B-20 (open detonation) Area Closure

Info: by C.D. Schmelling: - went over desire to
 remediate & get closure - concerned about off-site
 impact of g-w contamination

Rob: B-20 - used since 1740 to De-Militarize
 ordnance - Permit appl. not filed correctly
 have been spending \$1M but B-20 not as
 bad as Well #16

Revised to EPA in PFB w/ disclosure of B-20

2 year old work plan - not adequate - Guy told Susan
 to learn more about geology of site

Area located on large aerial photo. go flow to SS

- well on C Bullis land not contaminated Well #16

- B-20 is a 335 acre site - stopped use in
 due to complaints from Fair Oaks residents

Cited by EPA in 1993 for use w/o Permit

B-20 never closed out

EPA learned in November 1993

Susan R: - 33.5 ac. wooded 15 crates
 (all identified? filled?)

photos from 1966, 1986 & 1990
 6 crates 7 more

Small soil piles maintained to fill in crates

1994 work plan submitted to EPA/TNRC (Cecil Lutz)

TNRC APPROVAL (Cecil & Susan discuss sampling stats)

fieldwork done in 1994 → PDS #3(?) due to high levels

of metal contamination UXO sweep - picked up ordnance

surface & subsurface soil sampling

- found As & Pb in subsurface & Pb in surface soils

especially areas of small ordnance disposal

sediment & surface water sampling

Pb, Hg & Cd exceeded stds in surface waters

Conclusions - UXO remain on-site (buried?) contractor

UXB int'l to recover & dig for anomalies

Waste munitions

Scrap metal - Richard advised that PDS #1

requires clean up to background: must remove

scrap metal - Rod asked if the remediation

in the full soil column was required, Richard

answered yes - concern about proving clean

I added that the entire soil column will not be invasively

investigated if can state no disturbance in soils at surface

- they were hesitant to clean site of all scrap metal

- they did not believe cost effective for PDS #1

Background: they want to use background Pb of

highest type of soils ⇒ 133 ppm Pb

Richard was going to review data & statistics used to

reach background conclusions (concerned about outliers)

Break
Well #16

TDU sampling discovered PCE in Aug 1991

- 490 ft depth - 20 ft casing(?)
- total of 19 wells completed in Cow Creek on base
- down hole camera showed infiltrating g-w above water table (piezometric surface)

Regional g.w. flow rate ~15 A/gr - Gony pointed out that regional flow is SW (E?) & velocity reversals should be avoided

Packed off well #16 to determine hydraulic connectivity between Cow Creek & Bexar Shale (overlying) also "packed off" well #7 (west of well #16)

Gony asked Susan how "comfortable" she was w/ hydrogeology - Susan said "not very"

Gony - "what would you do if you had to address issues in 1 month?" - Susan could not answer

- then discussed B-3 & O-1

O-1 ⇒ oxidation pond - may be lined

Gony - "is digging out soils feasible?" - yes, but they are offering CSSA alternatives not doing feasibility study.

Gony then went through the data

- don't see why they don't delineate the plume using old methods - went through detection of contaminant along E-W strike fault & no detection in wells #9, 10, & 11

"do 2 things" - look SE - don't think fault dips to south

? - is there another water well (i.e. point of impact)

- potential contamination via "short fault" just south of O-1

Also Gony recommended removing soaps (s) O-1 & B-3

Gony asked about well construction info. - Brian said well #10 was acidified recently - Gony

Gony then directed discussion towards determination of known info on hydrogeology, PCE characteristics (D-NAPL, daughter products, more mobile than PCE) & when sources were last known to have received waste - B-3 & O-1 received wastes '75-'85

Gony does not think vertical transport is direct

- zig-zag through fast flow paths in fractured limestone.

Discussion went to removal of sources (first)

- not a closure activity for SWMUs B-3 & O-1

- this is remediation

- Brian Murphy was concerned about generation of LO

- Gony thought that H₂O (PCE) could be extracted (thermal desorption) & soils returned to ground

- I said they needed to determine potential for soils to be haz. (i.e. total PCE > 14,000 mg)

7:15 end of mtg

7:20 Lv. CSSA for home

Malcolm A. Jones
Oct. 19, 1995

July 28, 1997

Arr 7:30 [clear, humid, warm 77°F, lt breeze]

Σ work on CPC CE 973

Σ review IOM to Grace M-F from CBO re: ACE 3

12-1 lunch

Σ work on CPC CE 973

Σ Jim Board noted unsigned report CBO on ACE

- NOV & checklist cover page signed by JRB on 7/25/97
- I had JB sign IOM - dated 7/25/97

2:45 Called Brian Murphy CSSA 210-691-5205
 left message for - re: CEI of facility
 (mobile - 210-691-5205) ~~(M-F)~~

3:55 Brian Murphy re scheduling of CEI

- training (HSMs) of personnel
- gunsmiths shop - inspect curling in Am
- new HW storage area
- SRG
- sand w/ shot material - generated
- test firing in field 90
- looking at "bullet trap"
- be at front gate at 7:30 on 8/6/97 (Wed)
- in-briefing w/ Commander
- then 90
- 861-5217 (mobile)

Aug 6, 1997

Area 6155 - pretty cloudy-clear, horizon haze, humid warm 77F (lt breeze)

7:16 am HD for CSSA

7:35 Arr CSSA

In. Briefing

Brian Mueph Col Robinson (CR) Ernest N., Jr

Raymond Minor Jr

~~Ron Strickland~~ Ron Chatham

Ralph Chavez (Supervisor of Procurement)

Paul Oliver

Thomas

Bldg. 90

Andy Wood Ship Steward

Raymond Minor

Ralph

Cleaner - standard solvent (E/N 1) ^{emission point No 1} Vat #3

Volatile Corrosion Inhibitor Vat #2

Solvent recycled on-site

spent VCI drummed stored & disposed through

DRMO-container

solvent tank Vat #5 - small - gray & red top

Satellite Acc point for dirty solvent

dirty rags - plastic bucket on cart

rags sent for off-site cleaning

used absorbent - sand in "low" metal drum

Dirty / contaminated rags "Cleaner Lubricant Preservative (CLP)" aka "Brakeforce"

wastes analyzed for each shipment

weld to be 6L solvent - not now

probably to go Class 1

Bead blaster - very little waste generated - dust most significant contaminant is metals from paints etc.

satellite Acc of "Residue (Sludge)" from "wet" washing system
small wet washer & large unit replaced TCE/PCE degreaser unit

Test firing room - chamber filled w/ sand held behind wooden boards - sand generated every 7-8 yrs - total volume 75-80 yds generate 7-8 yds at a time

Solvent Recovery Systems (E/N #5) - on side of Bluing Shop continuous feed - run during the day (90-1) generates sludge

Bluing Shop (Bldg 90-1)

no longer using acid cleaner or soap wash only running about 2 hrs / mo

Bluing solution - NADH 83% (Heat Bath product) some drag-out of metals in residues

Sand Blast Shop Bldg 90-2

wheel abraders & unward sand blast or steel shot units

C.S.A. for - no-satellite accumulation for solvents from cleaning "vats" & sludge from solvent recovery unit - labeled hazardous 2 drums (55 & 30 gal) of spent solvent for

recycling (in SRS unit) labeled, but not labeled
as hazardous waste - claim #P 140
- I asked if they were 100% confident on Hal determination
suggested

Bldg 9 - Motor pool, Hubert Toms (Supervisor)
non-haz. - anti freeze: Cecil Nash (assistant)
- need diesel oil drained from tractors
all disposed through DEMO
- need absorbent (in part Class 1, analyzed
prior to disposal)
- need oil & used oil filter labeled properly
- need oil filter press
- need gasoline drum
(spark arrester to be connected)
- hazardous material storage (product)
- all oils etc handled through motor pool (as pharmacy)
- all sad cans (and patches) handled through
motor pool - pickup on Thursdays
- Tire shop - all vehicles now CSA contract
leased - only change tractors, etc.

Paint Booth - closed by commander - previous
operator retired

Bldg 10 - to be closed
floor gridded for 10 x 10 cm wipe sampling
wipe sampling to be performed

Bldg 86/HW storage bldg
Non-haz. waste stored in cell #2
car wash sump (Class 2) & Citiro Cleaner #1

Cell #1 - 2 drums (30 gal) of 'aqueous thinner'
labeled non-haz. but pending analytical results
- may be hazardous - accumulation start dates
10 July 1997 (both)

- provided w/ E.C. phase #1's (photographed)
and dry clean fire suppression system
closest phone in Pharmacy Bldg.

Pharmacy Bldg
Receiving (everything)
Recycling - light metals, styrofoam, books, glass
cardboard, reuse boxes, cans, plastics
newspaper, other papers (Weeger house)

existing Pharmacy located behind fenced area
in large warehouse room of bldg 86
drums of product or containment pallets outside
of fenced area

Pharmacy run by David Flores

Satellite accumulation of paint thinner
- newly stenciled - "satellite accumulation area"
on drum
- (5) 5-gallon white plastic containers provided
below (5) spray paint/aerosol can puncturing
drawing units - advised not to allow
waste to accumulate > 55 gallons total
between the five containers & the 55-gallon
metal drum into which they are
decanted (some wash stream)

Record review

- manifest # 01005334 Class 1 waste
- ? held at Atomic Petroleum Exchange
- from 7/19/96 - 8/1/96
- for second transporter - location unknown
- manifest # 01049924 - 4005209H - Haz solids
- (D008) F005 (F002 skipper)
- no LDR - Brian called TRCO
- manifest # 00946450 - 10/19/95 - explosives to
- Camp Bullis - no signed manifest
- received from Respected facility
- no signature of transporter (copy rec'd)
- Brian read fax of LDR for # 01049924
- showing no fax note to TRCO (copy rec'd)

Waste Mgmt Study Rpt dated June 1995
submitted of executive Summary & Certification
of Compliance & Correctives on 16 April 96

Draft closure plan for CSA #001 (dated Jan 97)
- unit still active
- NOR update sent by CSA but unit not
shown on plan

Personnel Training provided - records viewed - various
providers

- Reinspected movement of solvent from Bldg 90-2
to Bldg 86
- & movement of satellite accumulation to
Solvent Recovery shed at Bldg 90-1
from Bldg 90-2

9:40 and facility insp.

4:15
Lv. 5:45

Rtn to HQ - monthly reports

Mark [Signature] Aug 6, 1997

Returned to Phoenix for briefing on HSMS
system for inventorying of Haz materials
Jerry

12:20 - 1:15 lunch

- 1:30 Exit briefing (same attendees as in-briefing)
- * SAA - changes made - possible perception
of 750 gal in accumulation
- containers relocated (AOC)
- * Bldg 40 - documentation of notification received
does not appear on NOR (to be handled)
- * Bldg 90 - Pharmacy - centralization of haz mat
- * Records - LDR's received & requested (AOC)
- NOR shows location in Kendall Co.
(to be corrected)

SWMA tour

- B-28 soil stripings - soils sited - need to analyze, then close
- B-3 SVE set up
- D-1 electrical systems in place - test plot to be
traced on next week
- B-24 4 trenches - soils excavated, being sifted
UXO removed, metals pulled out w/magnet
- may still go Std 2 due to Pb. in soils
- B-20 area cleared, soils piled on plastic - visible
waste observed / slag & bullets - slag from
burning in place? - Brian said that additional
sampling would be performed & that he anticipated
some additional soils would be removed.

PROGRAM: ** COMPRESSED CM & E REPORT **
 CIRPINOG-012

*** R C R I S ***
 DATABASE: State Texas

ALL STATES LISTED BY FACILITY NAME

TIME: 19.34.05

RUN BY: EDS

HANDLER ID & NAME	B R	N S	R	EVAL	EVL	EVL	V	VIO	VS P	E R	ENF	DATE	SCHDL	ACTUAL	E	R	RSP	PENALTY	PENALTY
REGULATION VIOLATED	K N	A	DATE	SEQ	TYP	C	TYP	Q	I	TYP	ISSUED	COMPL	COMPL	A	PER	ASSESSD	SETTLED		

 TX2210020739 US ARMY CAMP STANLEY STORAGE Universes: SQG TRS T/S STATE ID: 69026 CITY: BOERNE

	S	850509		1	CEI														
	02	E	960521		CDI														
40 CFR 270.1	02	E	930121		CDI	1	DTT	1	9	215	930621		960521	E	MA		\$693,000		
40 CFR 265.112	02	E	930121		CDI	1	DCL	2	9	215	930621		960521	E	MA		\$693,000		\$45,000

**TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
MUNICIPAL SOLID WASTE DIVISION
INSPECTION REPORT - USED OIL HANDLERS**

Date: August 6, 1997
Region #: 013 - San Antonio

TNRCC Registration Number: N/A
County Name: Bexar

Organization/Business Name: U.S. Army - Camp Stanley Storage Activity
Organization/Business Address: 25800 Ralph Fair Road, Boerne, TX 78015-4800
Organization/Business Telephone Number: (210) 698-5208
Authorized On-Site Representative: Brian K. Murphy, Environmental Officer
Person(s) from Org./Business Participating in Inspection: Robert Jones, Cecil Noah
Person(s) from TNRCC Participating in Inspection: MARIONA A. FARRIS
Purpose of Inspection: Routine Follow-up Compliance Complaint Other: _____
Operation: U.S. Army Water park Describe

***** INSPECTION RESULTS *****

Refer to 30 TAC Chapter 324 & 40 CFR Part 279 for complete rules and regulations.
Yes = In Compliance, No = Not in Compliance, N/A = Not Applicable, Unk = Unknown, UO = Used Oil

Yes	No	N/A	Unk	Section	Description	Yes	No	N/A	Unk	Section	Description
PROHIBITIONS						NOTICE BY RETAIL DEALER					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.12(a)	UO shall not be managed in surface impoundments or waste piles unless in regulated units	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.5	Displaying notice to public that improper disposal of UO is illegal
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	279.12(b) & 324.4(2)	Intentionally or knowingly discharging or disposing UO improperly including use for dust suppression and/or weed abatement is prohibited	TRANSPORTERS/TRANSFER					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.12(c)	Burning of off-spec UO in approved units only	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.43(a)	Used oil deliveries must be made to registered UO receivers/handlers: Handler EPA ID #:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.4(1)	General prohibition against handling UO in such a manner to endanger public health or the environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.43(b)	Compliance with DOT requirements if UO meets definition of hazardous waste
GENERATORS						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.43(c) & 324.15	Proper cleanup & notification of used oil discharges during transportation
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	279.21	Proper management of mixtures of UO & hazardous waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.44(d)	Analyses to support rebuttable presumption retained for 3 years
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	279.22	SPCC Plan (See Note 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45	SPCC Plan (See Note 1)
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	279.22	USTs in compliance with 40 CFR Part 280 (See Note 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45 & 324.11(1)	USTs in compliance with 40 CFR Part 280 & 30 TAC 334 (See Note 2)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.22(a)	Approved storage units	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45(a)	Storage longer than 24 hours, but less than 35 days
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.22(b)	Storage units in good condition, not rusted or leaking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45(b)	Approved storage units
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.22(c)	Containers & fill pipes have "Used Oil" labels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45(c)	Storage units in good condition, not rusted or leaking
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.22(d) & 324.15	Proper cleanup & notification of used oil spills	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45(d),(e),(f)	Secondary containment
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	279.23	On-site burning in space heaters	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45(g)	Containers & fill pipes have "Used Oil" labels
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.24	Must use registered UO handlers for off-site shipments: Handler EPA ID #: <u>41654</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.45(h) & 324.15	Proper cleanup & notification of used oil spills at transfer facilities
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.46(a)(b)(c)	Must maintain records of all UO accepted & delivered (See Note 3)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.46(d)	Record retention for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.47	Properly managing residues
						Yes	No	N/A	Unk	Section	Description

Attachment 8
Subject: Camp Stanley Storage Area
25800 Ralph Fair Road Boerne
Bexar Co.
TNRCC SWR# 69026 EPA ID # TX2210020739
Compliance Evaluation Inspection of August 6, 1997

MARKETERS

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.71	Must ship off-spec UO to only a registered UO burner Burner EPA ID #:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.72(b)	Analysis record for on-spec UO to be retained for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.74(a)(b)	Must maintain records of all UO delivered (See Note 3)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.74(c)	Record retention for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.75(a)	Has certification from UO burner of EPA notification
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.75(b)	Certification retention for 3 years

PROCESSORS/REFINERS

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(a)(2)	Presence of required emergency response equipment: <ul style="list-style-type: none"> • Internal communication/alarm • External communication system • Fire/spill control/decontamination equipment
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(a)(3)	Equipment regularly tested
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(a)(5)	Sufficient aisle space
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(a)(6)	Arrangements/agreements with local response authorities
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(b)(1)	Documented contingency plan
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(b)(2)	Contingency plan contains: <ul style="list-style-type: none"> • Actions to be taken in response to emergency • Description of agreement with local emergency response • Names/addresses/phone numbers of emergency coordinators • List/description/location of emergency equipment • Evacuation plan
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(b)(3)	Copies of contingency plan submitted to local emergency response
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(b)(5)	Designated emergency response coordinator
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.52(b)(6)	Documented emergency procedures
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.54	SPCC Plan (See Note 1)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.54 & 324.12(1)	USTs in compliance with 40 CFR Part 280 & 30 TAC 334 (See Note 2)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.54(a) & 324.12(1)	Approved storage units
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.54(b)	Storage units in good condition, not rusted or leaking
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.54(c),(d),(e)	Secondary containment
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.54(f)	Containers & fill pipes have "Used Oil" labels
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.54(g) & 324.15	Proper cleanup & notification of used oil spills
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.55 & 324.12(3)	Written analysis plan for rebuttable presumption & on-spec UO

Yes No N/A Uok Section Description

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.56(a)(b)	Must maintain records of all UO accepted & delivered (See Note 3)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.56(c)	Record retention for 3
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.57(a)	Operating record for UO analyses
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.58	Must use registered UO handlers for off-site shipments: Handler EPA ID #:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.59	Properly managing residues

BURNERS OF OFF-SPEC OIL

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.61(a)	Burning of off-spec used oil in approved units
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.63(d)	Analyses to support rebuttable presumption retained for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.64	SPCC Plan (See Note 1)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.64 & 324.13(1)	USTs in compliance with 40 CFR Part 280 & 30 TAC 334 (See Note 2)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.64(a) 324.13(1)	Approved storage units
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.64(b)	Storage units in good condition, not rusted or leaking
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.64(c),(d),(e)	Secondary containment
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.64(f)	Containers & fill pipes have "Used Oil" labels
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.64(g) & 324.15	Proper cleanup & notification of used oil spills
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.65(a)	Must maintain records of UO accepted & delivered (See Note 3)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.65(b)	Record retention for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.66(a)	Certification that burner has notified EPA of UO activities
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.66(b)	Certificate retention for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.67	Properly managing residues

NOTES:

1 - SPCC (Spill Prevention, Control and Countermeasures) Plan applies to underground tank systems of more than 42,000 gallons and above ground systems of more than 1,320 gallons, or where the largest above ground tank exceeds 660 gallons.

2 - This applies to underground storage tank (UST) systems with 10% or more of the system volume below ground level (40CFR 280.12).

3 - Acceptance and delivery records include:

- a) Name and address of generator or handler who provided the UO for transport/receiver who accepted the UO
- b) The EPA ID number (if applicable) of generator or handler who provided the UO for transport/receiver who accepted the UO
- c) The quantity of used oil accepted/delivered
- d) The date of acceptance/delivery
- e) Signature, and date of receipt, of generator or handler who provided the used oil for transport/receiver who accepted the UO

..... INFORMATION FROM CENTRAL OFFICE

Yes	No	N/A	Unk	Section	Description
TRANSPORTERS/TRANSFER					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.42	EPA notification/ID number
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.11(2)	TNRCC biennial registration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.11(3)	TNRCC annual report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Financial assurance
PROCESSORS/REFINERS					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.57(b)	EPA biennial report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.51	EPA notification/ID number
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.12(2)	TNRCC biennial registration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.12(4)	TNRCC annual report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Financial assurance

Yes	No	N/A	Unk	Section	Description
BURNERS OF OFF-SPEC OIL					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.62	EPA notification/ID number
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.13(2)	TNRCC biennial registration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.13(3)	TNRCC annual report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Financial assurance
MARKETERS					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	279.73	EPA notification/ID number
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	324.14	TNRCC biennial registration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Financial assurance

Central Office Data By: _____ Date: _____

COMMENTS (Attach "Addendum to Used Oil Handlers Inspection Report", TNRCC-0649A, if additional pages are needed.)

Used oil generated by maintenance of non-General Service Contract Administration (GSA) contract vehicles only (i.e. tractors and machinery)

Last shipment of used oil was made to Alamo Petroleum Exchange on June 26, 1996 (see manifest, Attachment 1)

Signature: Melvin A. Lewis

Date: August 18, 1997

Approved: _____

Date: _____

**TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
MUNICIPAL SOLID WASTE DIVISION
INSPECTION REPORT - USED OIL FILTER HANDLERS**

Date: August 6, 1997
Region #: 013 - San Antonio

TNRCC Registration Number: N/A
County Name: Bexar

Organization/Business Name: U.S. Army - Camp Stanley Storage Activity
Organization/Business Address: 25800 Ralph Fair Road, Boerne, Tx 78015-4800
Organization/Business Telephone Number: (210) 698-5208
Authorized On-Site Representative: Brian K. Murphy, Environmental Officer
Person(s) from Org./Business Participating in Inspection: Hubert Jones, ~~Mark~~ Cecil Noah
Person(s) from TNRCC Participating in Inspection: Malcolm A. Ferris Purpose of Inspection: Routine Follow-up Compliance Complaint Other: Describe Operation: U.S. Army motor pool

*****INSPECTION RESULTS*****

Refer to 30 TAC Chapter 330 for complete rules and regulations.
Yes = In Compliance, No = Not in Compliance, N/A = Not Applicable, Unk = Unknown, UOF = Used Oil Filter

Yes	No	N/A	Unk	Section	Description	Yes	No	N/A	Unk	Section	Description
STORAGE FACILITIES											
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(a)	Sufficient spill equipment or spill response plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(a)	Sufficient spill equipment or spill response plan
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(d)	Record retention for 3 years	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(e)	Storage units in good condition, not rusted or leaking
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(e)	Storage units in good condition, not rusted or leaking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(a)(4)	Use of bill of lading
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(b)	Prohibition against discharge of any waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(a)(5)	Record retention for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(d)(3)	Store UOFs no longer than 90 days	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(a)(8)	Spill kit & fire equipment on board
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(e)(1)	UOFs stored in covered enclosure or rainproof containers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(c)(1)	Store UOFs no longer than 10 days
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(e)(2)	Containers labeled with "Used Oil Filters" in three inch letters and owner name and phone number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(a)(6)	Must deliver UOFs to registered UOF handler: Handler TNRCC Reg. #:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(e)(3)	Secondary containment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GENERATORS	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(f)	Approved management plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(a)	Sufficient spill equipment or spill response plan
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(g)	Must use registered UOF handler for off-site shipments: Handler TNRCC Reg. #:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(e)	Storage units in good condition, not rusted or leaking
PROCESSORS											
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(a)	Sufficient spill equipment or spill response plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1186(a)	Removal of as much free flowing oil from UOF as possible
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(d)	Record retention for 3 years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1186(c)	Record retention for 3 years
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1182(e)	Storage units in good condition, not rusted or leaking	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1186(e)	Container identification label end/or number matches bill of lading
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1185(b)	UOFs meet processing standards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1186(f)	Containers have "Used Oil Filters" labels in three inch letters and owner name and phone number
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1185(o)(1)	Use of bill of lading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1186(d)	Must use registered UOF handler for off-site shipments: Handler TNRCC Reg. #:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1185(d)	Store unprocessed UOFs no longer than 30 days						

TRANSPORTERS

Attachment 8
Subject: Camp Stanley Storage Area
25800 Ralph Fair Road Boerne
Bexar Co.
TNRCC SWR# 69026 EPA ID # TX2210020739
Compliance Evaluation Inspection of August 6, 1997

..... INFORMATION FROM CENTRAL OFFICE

Yes	No	N/A	Unk	Section	Description
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(d)(1)	Annual registration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(d)(2)	Annual report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1183(e)	Financial assurance

TRANSPORTERS

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(a)(1)	Annual registration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(a)(2)	Annual report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1184(a)(1)	Financial assurance

Yes	No	N/A	Unk	Section	Description
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1185(a)(1)	Annual registration
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1185(a)(2)	Annual report
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	330.1185(a)(3)	Financial assurance

PROCESSORS

Central Office Data By: _____ Date: _____

COMMENTS (Attach 'Addendum to Used Oil Filter Handlers Inspection Report', TNRCC-0654A, if additional pages are needed.)

New used oil filter press installed.

Used oil filters generated on reg. on frequent basis, from maintenance of non-GSA (General Service Administration) contracted vehicles only (i.e. tractors and machinery)

Last shipment of used oil filters was made on March 15, 1995, to Safety-Kleen Corp. (San Antonio) - see manifest (Attachment 1)

Signature: *Malcolm R. Green* Date: *Aug 18, 1997*

Approved: _____ Date: _____

8/7/97
10:13 AM



Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, Texas 78015-4800



F A X C O V E R S H E E T

TO: Malcom Ferris

VOICE: (210) 490-3096

FAX: (210) 545-4329

FROM: Brian K. Murphy, CSP

VOICE: (210) 698-5208 or DSN 421-7453

FAX: (210) 295-7386 or DSN 421-7386

RE: Used Oil and Drained Oil Filters Manifests

Number of pages including cover sheet: 3

Comments:

Attached are the manifests you requested for used oil that is recycled and drained oil filters shipped from Camp Stanley.

Any questions please call.....


Brian



NON-HAZARDOUS MANIFEST

GENERATOR

GENERATOR NAME AND ADDRESS CAMP STANLEY 25800 RALPH FAIR RD BOERNE TX	GENERATING LOCATION/ADDRESS SAME
PHONE NO. ()	PHONE NO. ()

GENERATOR'S US EPA ID NO.	STATE GENERATOR'S ID:
---------------------------	-----------------------

DESCRIPTION OF WASTE	WASTE CODE	QUANTITY	UNITS	CONTAINERS		TYPE
				NO.	TYPE	
WASTE OIL/TNRC (SG=1.2) WASTE OIL/TNRC	M/A	5	D	1	T	D - DRUM C - CARTON B - BAG
WASTE OIL/Anti Freeze (SG=1.2) 1005 2761	M/A	1	D	1	T	T - TRUCK P - POUND Y - YARDS O - OTHER

GENERATOR AUTHORIZED AGENT NAME BRIAN K. MURPHY	SIGNATURE Brian K. Murphy	SHIPMENT DATE 27 JUNE 96
--	------------------------------	-----------------------------

TRANSPORTER

TRUCK NO. H 600	PHONE NO. 1-800-322-5085
--------------------	-----------------------------

TRANSPORTER NAME ALAMO PETROLEUM EXCHANGE	DRIVER NAME (PRINT) ERNEST LEAL
--	------------------------------------

ADDRESS 454 SOLEDAD, STE. 100 SAN ANTONIO, TX 78205	VEHICLE LICENSE NO./STATE	VEHICLE CERTIFICATION
---	---------------------------	-----------------------

US EPA ID NO. TXD987991866	STATE TRANSPORTER'S ID: 41654
----------------------------	-------------------------------

I HEREBY CERTIFY THAT THE ABOVE NAMED MATERIAL WAS PICKED UP AT THE GENERATOR SITE LISTED ABOVE.

I HEREBY CERTIFY THAT THE ABOVE NAMED MATERIAL WAS DELIVERED WITHOUT INCIDENT TO THE DESTINATION LISTED BELOW.

DRIVER SIGNATURE Ernest Leal	SHIPMENT DATE 6-26-96	DRIVER SIGNATURE Ernest Leal	DELIVERY DATE 6-26-96
---------------------------------	--------------------------	---------------------------------	--------------------------

DESTINATION

SITE NAME ALAMO PETROLEUM EXCHANGE	PHONE (800) 322-5085
---------------------------------------	-------------------------

ADDRESS RT. 5 BOX 360X SAN ANTONIO, TX 78221	Attachment 8 Subject: Camp Stanley Storage Area 25800 Ralph Fair Road Boerne Bevar Co. TNRCC SWR# 69026 EPA ID # TX2210020739 Compliance Evaluation Inspection of August 6, 1997
--	---

US EPA ID NO. TXD987991866	STATE FACILITY'S ID: 41654
----------------------------	----------------------------

I HEREBY CERTIFY THAT THE ABOVE NAMED MATERIAL HAS BEEN ACCEPTED AND TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND ACCURATE

NAME OF AUTHORIZED AGENT W. D. ...	SIGNATURE W. D. ...	RECEIPT DATE 6/26/96
---------------------------------------	------------------------	-------------------------

FY 1985 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

EPA ID: TX221002A739
 HANGLER NAME: CAMP STANLEY
 ADDRESS: SAN ANTONIO, TX
 14. Handler Type: Major Non-Major

DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 05/19/85
 ACTION (A, C, D): _____
 So. AGENCY RESPONSIBLE FOR EVALUATION: Put code in box
 Choose one: E = EPA, S = State, J = Joint, C = Contractor/EPA, O = Other, B = Contractor/State, X = Oversight

TYPE OF EVALUATION COVERED BY THIS REPORT: I
 Put code in box Choose one: 1 = Evaluation Inspection, 2 = Sampling Inspection, 3 = Record Review, 4 = Ground Water Monitoring Evaluation, 5 = Follow Up, 6 = Other - Citizen Complaint, 7 = Other - Part B Call-In, 8 = Other - Withdrawal Candidate, 9 = Other - Closed Facility, 0 = Other - General
 ACTION (A, C, D): _____

DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from S): __/__/__

AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.)	Class of Violation							
	GWM	CL/PC	Fin. Res.	Pt. S	Carl. Sch.	Manifest	Other	
								0

ENFORCEMENT ACTIONS:

Area of Violation	Type (use code)	Date Action Taken	Compliance Dates Scheduled	Actual	Penalty Assessed	Collected	Resp. Ag. (use code)
		05/17/85					S

Codes for Types of Enforcement Actions: 03 = Warning Letter, 05 = Administrative Order, 11 = Filed Civil Action, 12 = Filed Criminal Action
 (See instruction for additional codes) 10 = Informal
 Codes for Responsible Agency: E = EPA, S = State, X = EPA oversight

Comments: FACILITY IS NOTIFIED AS A CRF AND IN COMPLIANCE
 (Limit each comment to 80 characters. Up to 99 comments are possible.)

KEY: A - Add
 C - Change
 D - Delete