



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

5 September 1997

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Office of the Commander

Texas Natural Resource Conservation Commission
San Antonio Regional Office, Region 13
Waste Program Manager
140 Heimer Road, Suite 360
San Antonio, Texas 78232-5042
Attn: Mr. Henry Karnei, Jr.

SUBJECT: Compliance Evaluation Inspection of August 6, 1997
TNRCC Industrial Solid Waste Registration #69026
EPA Identification Number TX2210020739
Bexar County

Mr. Karnei,

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Army Material Command, U. S. Army, is providing this response to you as a result of a Compliance Inspection which occurred on 6 August 1997, by Mr. Malcolm A. Ferris. All responses in the following pages are keyed to the attached memorandum provided by your office dated 21 August 1997 to CSSA. We are confident all matters contained herein have been resolved to the best of our ability.

Should you require any additional information, please contact me or Mr. Brian Murphy on (210) 295-7416 or (210) 698-5208, respectively.

Sincerely,

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

Attachments

INFORMATION COPY

cc: Executive Director, TNRCC
Chief, Industrial & Hazardous Waste Section
Mr. Richard Clarke

EPA, Region 6
Superfund Branch,
Hazardous Waste Management Division,
Mr. Greg Lyssy

EPA, Region 6
Chief, Texas Section, Enforcement Branch,
Compliance Assurance and Enforcement Division
Mr. Sam Coleman

1 RESPONSE TO SUMMARY OF VIOLATIONS
CAMP STANLEY STORAGE ACTIVITY (CSSA)
COMPLIANCE EVALUATION INSPECTION (CEI) 6 AUGUST 1997

VIOLATIONS ALLEGED AND RESOLVED DURING CEI

1. Hazardous Waste Determination

The Crown Lacquer Thinner that received an alleged violation, was purchased by CSSA for the first time in 1996 and used in a stripping operation for weapon stocks in Building 90. Since this waste stream has not been generated in the past, CSSA managed the waste from this operation as if it were hazardous waste, with the exception of labeling, until proven otherwise. A waste analysis on the material was pending at the time of inspection and has since been received. A copy of the analytical results are attached.

Hazardous waste labels were placed on the two drums in Building 86 (NOR Unit 002) on 20 August 1997 after conversations with Mr. Ferris. CSSA's NOR was updated to reflect this new waste stream, number 4018209H, and forwarded to the Central Office, Waste Evaluation Section, TNRCC via the State of Texas Electronic Environmental Reporting System (STEERS). A copy of an MSDS for the material and NOR update was provided to the Regional Office via facsimile on 20 August 1997.

The particular drums of material were being managed as if they were waste, however, were not labeled as such. CSSA now understands that future activities involving materials will be labeled as wastes until a waste determination indicates otherwise.

In response to your other inquiry, there have been no wastes generated under our NOR waste code 20092092 since the number was created in January. Prior to that timeframe the eight-digit codes as we know them today were not used.

AREAS OF CONCERN

A. CSSA has no explanation for the county location error listed in the TNRCC NOR. Prior updates to NOR data have been provided and the county of Bexar was never changed by CSSA to read Kendall. The only explanation we can think of is that, although CSSA is located in northern Bexar County, the zip code for the facility is Boerne, Texas. CSSA also now understands that inconsistent information is present in CSSA's registrations with the U.S. Environmental Protection Agency. Perhaps the reason for this confusion is that CSSA's mailing address has changed since 1994 and the Post Office also revised the zip code areas. However, CSSA will

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correct the information under separate written correspondence to the TNRCC Waste Evaluation Section, with copies sent to the TNRCC San Antonio Region 13. CSSA will also notify EPA of our current address and location.

The TNRCC advised CSSA that the Notice of Registration (NOR) maintained by CSSA with the TNRCC does not include solid waste management units (SWMUs) which were identified during the recent CEI. As requested, CSSA is currently reviewing documentation to determine which SWMUs, if any, were receiving waste at the time of the initial facility registration notification of January 24, 1983, or afterwards. Once this review is complete CSSA will update its NOR under separate written correspondence to the TNRCC.

It was noted during the inspection by Mr. Ferris that the mission of CSSA is not as a manufacturing facility. 31 Texas Administrative Code (TAC) section 335.1 defines industrial solid waste as "Solid waste resulting from or incidental to any process of industry or manufacturing or mining or agricultural operation, which may include hazardous waste....." Thus, since CSSA operates as a support facility for the storage, testing and maintenance of military munitions, it generates some small amounts of wastes incidental to its mission. At the present time, CSSA believes that its designation as an industrial facility is the most appropriate. However, CSSA reserves the right to re-evaluate this designation in the future, as conditions dictate.

B. CSSA is currently proceeding with site investigation/closure efforts for a number of SWMUs under 31 TAC §335 Subchapter S which allows decontamination of contaminated media within a SWMU. CSSA asserts that the soils undergoing investigations and decontamination within the SWMU are not generated wastes and therefore are not subject to the notification and accumulation time requirements for wastes. While some of the material has been moved within the SWMU during the investigation and decontamination efforts, it has not been removed from the SWMU and thus has not been generated. The movement of material within the SWMU is analogous to stirring a tank; the material has been moved from its original location, but a waste has not been generated. Movement of the soil/material at the SWMUs under investigation is needed to remove unexploded ordnance. Were the material to be removed from the vicinity of the SWMU for treatment, storage or disposal, it would be considered a solid waste and therefore

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subject to a hazardous waste determination. If the materials were found to be hazardous wastes, CSSA would manage the material in full compliance with accumulation time requirements as well as all other applicable requirements. We have kept EPA, as well as TNRCC, aware of our site investigation plans and procedures and are confident that we are operating under the complete concurrence of EPA.

Management of the materials within the B-20 SWMU is in compliance with the Texas Water Code's prohibitions on unauthorized discharges because no new material has been introduced to the unit, nor has a new discharge been created by moving the soil within the unit. Planned decontamination efforts, fully coordinated with EPA potentially include phyto-decontamination and stabilization of the lead containing soils, will significantly decrease the chance that a unauthorized discharge could occur at this unit. Again, CSSA and its environmental consultant believe our activities at B-20 are totally consistent with 30 TAC §335, Subchapter S.

CSSA will submit to the TNRCC, under separate cover, a workplan for decontamination efforts currently being planned for various CSSA SWMUs. This workplan includes standard operating procedures for the stabilization of lead contaminated soils. CSSA has not generated a waste by the movement of contaminated media within a SWMU. Therefore, CSSA will not be submitting a waste analysis plan under the land disposal restriction requirements. In addition, CSSA is identified as a small quantity generator which 40 CFR Part 268.1(e)(1) adopted by reference in 31 TAC §335 Subchapter O, exempts us from the provisions of Part 268. ←

C. Two containers of spent solvent and one drum of solvent sludge was observed in Building 90-2 during the CEI. The spent solvent containers were moved to CSSA's container storage area (NOR Unit 002) until they can be processed in our solvent recovery unit. They will be recycled as soon as possible. The other drum, solvent sludge, was sampled on 5 August 1997 for a waste determination to be conducted. The drum was also relocated to the solvent recovery shed adjacent to Building 90-1. The attached analytical results for the sludge indicate that this waste stream is hazardous as it exhibits the characteristic of ignitability, due to a flash point of 120 degrees Fahrenheit, and the characteristic of toxicity due to the concentrations of chromium (7.4 milligrams/liter [mg/L]), lead (10.0 mg/L),

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and mercury (0.2 mg/L). Thus, the hazardous waste numbers D001, D007, D008, and D009 apply to this waste. CSSA will update the NOR for this waste code, 4011609H. When the drum is full it will be transported to Building 86, NOR Unit 002, as required, and disposed of as hazardous waste. ←

D. As noted during the CEI all land disposal restriction forms were obtained from the various facilities that received our wastes.

It should be noted that since CSSA is a small quantity generator, 40 CFR 268.1(e)(1) adopted by reference in 30 TAC §335 Subchapter O, exempts us from the provisions of Part 268. Therefore, the land disposal restriction notifications are not required. ←

E. A shipment of waste munitions from CSSA to Camp Bullis on October 19, 1995, was manifested unnecessarily. CSSA understands that no manifest is necessary for shipment of hazardous wastes between contiguous facilities on a private road controlled by the same owner, the United States Government. CSSA will ensure that future shipments of hazardous waste from CSSA meet current regulations.

It should also be noted that CSSA had not signed the original manifest prepared by Fort Sam Houston. When the manifest was given to the CSSA Environmental Office on 19 October 1995, Mr. Ferris was notified regarding the shipment.

F. The former degreasing unit recently removed from Building 90 was part of an industrial process used to prepare small arms weapons for use/storage. The unit was located in a sump as a spill control precaution. There were no known spills from the degreaser unit. The sump is still in place in Building 90 and is covered with a steel plate. The non-chlorinated, citrus-based, solvent degreaser currently in use is situated on top of the steel plate. The degreaser was not used to treat, store, or dispose of hazardous wastes and therefore is not subject to closure requirements. CSSA is not required to investigate a process unit that is taken out of service. Also, it would not be economically prudent to attempt to investigate the ground under Building 90. CSSA plans to take no further action on this item.