

**Air Permit No. 29466**  
**March 1996**

Permit Number 29466

\*\*\*GENERAL PERMIT INFORMATION

PERMIT: 29466 ENGR: BULLARD, KAREN M./  
ISSUED TO: DEPARTMENT OF THE ARMY-CAMP STANLEY  
SITE NAME: CAMP STANLEY STORAGE FACILITY  
OPERATING SCHEDULE: 24.0 HRS/DAY 7 DAYS/WK 52 WKS/YR  
LAT: 32-40-35 LONG: 098-37-52 REGION: 13 COUNTY: BEXAR  
NEAR CITY: BOERNE LOC: 25000 RALPH FAIR RD

GROUP: COAT ID:

\*\*\*PERMIT/SITE CONTACT INFORMATION:

PERSON: LEAN C. SCHILLING ADDR1: 25000 RALPH FAIR RD  
TITLE: POST COMMANDER ADDR2:  
CITY: BOERNE STATE: TX ZIP: 78006 PHONE: ( ) -

\*\*\* CONSTRUCTION \*\*\*

TYPE APPL(C,R,X): (C)  
APPL RECD : 06-19-75  
DEFIC LTR SNT : 06-23-75  
SUPP INFO REQ : 08-21-75  
SUPP INFO RECD : 08-22-75  
APPL CMPLT : 12-28-75  
COMP LTR SNT : 02-16-76  
PUB NTC SNT : 06-25-75  
PUB NTC PUB : 08-16-75  
PUB HEAR (R,H) : ( )  
CNST TYPE(C,X,S): (C)  
DISP (I) : 02-16-76  
CNST START DATE :

\*\*\* OPERATING \*\*\*

OPERATION START :  
OPER APPL RECD :  
OPER APPL CMPLT :  
DISP(I,D): ( )  
APP TYPE(C,R,S) : ( )  
\*\*\*\*\*  
\* I= ISSUED O= DENIED \*  
\* E= EXPIRED \*  
\* C= CNST S= SPECIAL \*  
\* Y= EXEMPT R= OPER \*  
\*\*\*\*\*

\*\*\* CONTINUANCE \*\*\*

NOTICE MAILED :  
APPL RECD :  
DEFIC LTR SNT :  
SUPP INFO REQ :  
SUPP INFO RECD :  
APPL CMPLT :  
COMP LTR SNT :  
PUB NTC SNT :  
PUB NTC PUB :  
PUB HEAR(R,H) : ( )  
DISP(I,D,E):( ) :

EMISSIONS CHANGED :

\*\*\*REMARKS:ALT ON 4/4/76 TO REMOVE MTL. USAGE TABLE.

\*\*\*OTHER PERMIT DATES:

APP/PERMIT VOIDED: REASON:  
APP ON HOLD UNTIL: REASON:  
CONST STOPPED UNTIL:

VOID/HOLD CODES: PD-PLT DISMANTLED  
CR-COMPANY REQUEST TI-TIME EXPIRED  
DD-DATA DELAY TD-TECH DIFFICULTY  
RE-REISSUED NR-NO RESPONSE

\*\*\*PERMIT TYPES/STANDARDS:

NEW MAJ SOURCE:> 100 TBY: CIC:  
MAJOR MODIFICATION: PORTABLE: RELATED PERMITS: SUFFIX REASON  
NON-ATTAIN REVIEW: NSRS: TACE: CHG LOC:  
INSIGNIFICANT EMISSIONS: MECHAP: PSD-TX: CHG OWN:  
FUEL CONVERSION: TOXIC MATERIALS: STD EX NO.:

\*\*\*AIR CONTAMINANT INFORMATION:

NAME CODE MAX ALLOWABLE RATE ACTUAL  
LBS/HR TONS/YR TONS/YR

\*\*\*ADATEMENT EQUIPMENT:

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



Office of Air Quality  
New Source Review Division (MC-162)  
Post Office Box 13087  
Austin, Texas 78711-3087



FORM PI-3A

Operations Certification (Part 1 of 2)  
§116.110(b)(1)(A)

For facilities permitted by authority of Title 30 Texas Administrative Code Chapter 116.

*This certification must be signed by an individual with process knowledge in a managerial capacity and must be submitted upon completion of construction and prior to start of operation of the authorized facilities.*

I. Air Permit Number: 29466 TNRCC Air Quality Account Number: BG-0841-S  
Approval date of latest permit action: 2-15-96  
*(Please use agency approval date as shown on accompanying permit, amendment or other type authorization)*

II. Permittee  
Permit Issued To: Department of Army, Camp Stanley  
Mailing Address: 25800 Ralph Fair Rd.  
Boerne, TX 78015-4800  
Technical Contact: (Person, Title, Mailing Address) Brian Murphy, Environmental Officer  
Telephone: ( 210 ) 221 - 7453 Fax: ( 210 ) 221 - 8866

RECEIVED  
APR 02 1996  
PERMITS PROGRAM

III. Permit Unit Information  
Permit Unit Name: Camp Stanley Storage Activity  
Location: (Nearest City) San Antonio County: Bexar

IV. Construction and operating dates for units affected by this permit approval:  
 Check here if no construction is associated with the approved project (*go to Section V if checked*).  
 Check here if portions of the approved project have already begun operation or will begin operating before construction is complete (i.e., phased construction); in this case, please submit separate Forms PI-3A and PI-3B for each phase, with construction and operating dates applied to the phase. Describe phase or portion of the project for which this certification is filed:  
  
Date for start of construction: \_\_\_\_\_  
Date for completion of construction: \_\_\_\_\_  
Date for proposed start of operation: \_\_\_\_\_

V. A copy of this certification must be sent to the appropriate TNRCC Regional Office (*please send original to the agency address shown at top of this form*).  
Regional Office (city) sent to: San Antonio

VI. Certification  
I, Dean C. Schmelling \_\_\_\_\_ Commander  
Name - please print or type Title - Owner, Plant Manager, President, Vice President, Environmental Director

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge. I certify that the facilities or changes authorized by the referenced permit have been accomplished as represented, if those representations affect emissions, method of control, or character of emissions.  
DATE 3/29/96 SIGNATURE [Signature]  
Note: Original signature in ink required.

In all cases, a second certification, FORM PI-3B, must be submitted simultaneously with any report of testing or monitoring results required by the permit or, if no testing is required, within 60 days of the commencement of operation.  
Version 10/04/95

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



Office of Air Quality  
New Source Review Division (MC-162)  
Post Office Box 13087  
Austin, Texas 78711-3087



FORM PI-3B

Operations Certification (Part 2 of 2)  
§116.110(b)(1)(B)

For facilities permitted by authority of Title 30 Texas Administrative Code Chapter 116.

*This certification must be signed by an individual with process knowledge in a managerial capacity, and must be submitted simultaneously with any report of testing or monitoring results required by the permit; or, if no testing or monitoring is required, within 60 days of the commencement of operation.*

I. Air Permit Number: 29466 TNRCC Air Quality Account Number: BG-0841-S  
Approval date of latest permit action: 2-15-96  
Submittal date of companion Form PI-3A (Part 1 of Operations Certification): 3-29-96

II. Permittee

Permit Issued To: Department of Army, Camp Stanley  
Mailing Address: 25800 Ralph Fair Rd.  
Boerne, TX 78015-4800  
Technical Contact (Person, Title, Mailing Address): Brian Murphy, Environmental Officer  
Telephone: ( 210 ) 221 - 7453 Fax: (210 ) 221 - 7386

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Date for start of construction: \_\_\_\_\_  
Date for completion of construction: \_\_\_\_\_  
Date for start of operation: \_\_\_\_\_

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RECEIVED  
APR 03 1996  
PERMITS PROGRAM

VI. Certification

I, Dean C. Schmelling Commander  
Name - please print or type Title - Owner, Plant Manager, President, Vice President, Environmental Director

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge. I certify that the facility complies with all terms of the preconstruction permit and that operations of the facility are in compliance with the Texas Clean Air Act (Chapter 382, Texas Health & Safety Code) and the rules of the TNRCC.

DATE 3/31/96 SIGNATURE [Signature]  
Note: Original signature in ink required.

file

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



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

April 4, 1996

Colonel Dean C. Schmelling  
Post Commander  
DEPARTMENT OF THE ARMY-CAMP STANLEY  
25800 Ralph Fair Road  
Boerne, Texas 78006

Re: Permit Alteration  
Permit No. 29466  
Cold Solvent Cleaning  
Boerne, Bexar County  
Account ID No. BG-0841-S

Dear Colonel Schmelling:

This is in response to your request on March 12, 1996 to alter the conditions of the referenced permit. We understand that you would like the material usage limitations table to be removed from the conditions because it conflicts with the use of the chemical flexibility condition.

Pursuant to the authority conferred under Section 382.0511(b) of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, and 30 TAC Section 116.116(b) (Regulation VI), Permit No. 29466 is altered. The altered permit conditions are enclosed. Please attach these to your permit.

Your cooperation in this matter is appreciated. If you have further questions, please contact Ms. Karen M. Bullard of our Office of Air Quality, New Source Review Division at (512) 239-6142.

Sincerely,

*for Dan Pearson*  
Dan Pearson  
Executive Director

DP/KB/se

Enclosures

cc: Mr. James Menke, Air Program Manager, San Antonio

## SPECIAL CONDITIONS

Permit No. 29466

### GENERAL

1. This permit authorizes the construction and operation of a Weapons Cleaning Room at Building 90 in Boerne, Bexar County. Sources covered by this permit include Solvent Vat Nos. 1 through 4, the Volatile Corrosion Inhibitor (VCI) Vat, the Fingerprint Remover (FR) Tank, and the Solvent Recovery Unit.

This permit does not cover the other sources of emissions at this site including two paint booths, five storage tanks, two steel shot abrasive cleaners, the gun bluing shop, four standby generators, three boilers, wastewater treatment equipment, and the gun room. These other sources of emissions are covered by Standard Exemptions 75, 86, 102, 41, 5, 7, and 61, respectively. The gun room is a grandfathered source.

2. Within 30 days of the date of this permit, all emission points corresponding to the emission point identification numbers on the maximum allowable emission rates table (MAERT) shall be physically identified (by tagging, labeling, engraving, etc).

### EMISSION LIMITS

3. Opacity of emissions from any emission point must not exceed 5 percent averaged over a six-minute period, except for those periods described in 30 TAC Section 111.111(a)(1)(E) of Regulation I. Opacity shall be determined using Environmental Protection Agency Reference Method 9.

### OPERATIONAL LIMITATIONS

4. Solvent Vat Nos. 1 through 4, the VCI, and the FR Tank (hereafter referred to as "the cleaners") shall be equipped as follows:
  - A. Covers shall be provided for the cleaners which shall be kept closed whenever parts are not being handled in the cleaners.
  - B. An internal cleaned parts drainage rack shall be provided for enclosed draining under the cover.
  - C. The solvent spray system shall produce a solid stream and not an atomized or shower spray. The spray system shall operate at a pressure of 10 pounds per square inch gauge or less, as necessary, to prevent splashing above the freeboard.

SPECIAL CONDITIONS

Permit No. 29466

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- D. The solvents used in the cleaners shall not be heated above 120 °F.
5. The cleaners shall be operated as follows:
- A. A permanent, conspicuous label with the following operating procedures shall be posted on or near the cleaning units. These operating procedures shall be strictly followed.
- (1) Covers shall be closed at all times except when processing workloads through the cleaning units.
  - (2) Parts shall be allowed to dry within the cleaner freeboard area for at least 15 seconds or until visibly dry.
  - (3) Waste solvents shall not be disposed of or transferred to another party such that the waste solvent will evaporate into the atmosphere. Waste solvent shall be stored only in covered containers.
- B. All doors and other openings leading from the weapons cleaning area in Building 90 shall be kept closed at all times except to allow transit of equipment and personnel.

CHEMICAL FLEXIBILITY

6. This permit allows the substitution of volatile organic compounds (VOC)-containing products that meet the following conditions:
- A. Any new or replacement compound is listed on the TNRCC Toxicology and Risk Assessment effects screening level (ESL) list dated April 10, 1995.
- B. Any new or replacement compound emitted at rates of less than 0.04 pounds per hour (lb/hr) shall be exempt from parts A and C of this condition.
- C. Emissions of new or replacement VOC and particulate compounds shall satisfy the following equation:

$$ER_1 * 1250 \mu\text{g}/\text{m}^3 + ER_2 * 1477 \mu\text{g}/\text{m}^3 + ER_3 * 869 \mu\text{g}/\text{m}^3 + ER_4 * 1074 \mu\text{g}/\text{m}^3 + ER_5 * 1117 \mu\text{g}/\text{m}^3 \leq \text{ESL}$$

SPECIAL CONDITIONS

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where:

- ER<sub>1</sub> = Maximum hourly emission rate of new compound from the VCI Vat and Cleaning Vat No. 1.
- ER<sub>2</sub> = Maximum hourly emission rate of new compound from Cleaning Vat Nos. 2 and 3.
- ER<sub>3</sub> = Maximum hourly emission rate of new compound from Cleaning Vat No. 4.
- ER<sub>4</sub> = Maximum hourly emission rate of new compound from the Fingerprint Remover Tank.
- ER<sub>5</sub> = Maximum hourly emission rate of new compound from the Solvent Recovery Unit.
- ESL = The 30-minute ESL of the new compound.

D. This condition allows for changes in product formulations and does not allow for any increase in total emissions from any emission point listed on the MAERT.

RECORDKEEPING

7. A recordkeeping system shall be devised and implemented which demonstrates compliance with the emission limits on the MAERT. At a minimum, records shall contain the following information:
- A. Material Safety Data Sheets for materials currently in use and those used during the previous two years. Records are only required for materials with the potential to emit air contaminants.
  - B. Records shall indicate material usages of all raw materials specified in part A of this condition.
  - C. Information from parts A and B of this condition shall be used to generate a monthly report containing the following information:
    - (1) The VOC emissions from all emission point numbers in pounds per hour on a daily basis and tons per year over the previous 12 months. Hourly emission rates may be calculated as daily VOC usage divided by actual hours of operation.
    - (2) Total material usage for the previous 12 months.

SPECIAL CONDITIONS

Permit No. 29466

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(3) Calculations to demonstrate that any products substituted for those in the original application will meet the chemical flexibility requirements in Special Condition No. 6.

8. All records shall be maintained for the most recent 24 months in a central location at Building 90.

HOUSEKEEPING

9. All chemical spills shall be cleaned up promptly using appropriate cleanup procedures.

10. All equipment covered by this permit shall be operated and maintained in accordance with the manufacturer's instructions.

11. Materials that have been used for cleaning shall be stored in sealed containers for proper disposal.

Dated 4-4-96

ALTERATION  
TECHNICAL REVIEW

Permit No: 29466 Record No: 42247 Account No: BG-0841-S  
Project Type: RRVN Company: DEPARTMENT OF THE ARMY-CAMP STANLEY  
County: Bexar City: Boerne  
Facility Name: COLD SOLVENT CLEANING

**AUTHORIZATION CHECKLIST** (any "Yes" requires signature by Executive Director):

- Will a new policy/precedent be established? No
- Was at least one public hearing request received? No
  - If yes, was/were all the request(s) withdrawn? No
- Is a state or local official opposed to the permit? No
- Is waste or tire derived fuel involved? No
- Are waste management facilities involved? No

**PROJECT OVERVIEW**

Department of the Army - Camp Stanley is requesting an alteration to remove the material usage limitation table from the permit conditions. By specifying the amount of each solvent that may be used in the degreasers, this table conflicts with the condition allowing chemical flexibility. There will be no change in the emissions or other representations from the original permit application.

**REQUEST FOR COMMENTS**

REGION: 13	Notified: 3/19/96	Russell Sawyer
CITY: n/a	Reviewed by:	
COUNTY: n/a	Reviewed by:	
TARA: n/a	Reviewed by:	
COMP: n/a	Reviewed by:	
LEGAL: n/a	Reviewed by:	

**REVIEW SUMMARY**

Process Description

No changes from original application other than a request to use the chemical flexibility condition.

Sources, Controls and Bact

No changes from the original application

Miscellaneous

1. Is applicant in agreement with special conditions? ..... yes  
 Company representative(s) ..... **Brian Murphy**  
 Contacted via? ..... fax  
 Date of contact? ..... 3/19/96
2. Did the franchise tax verify the applicant to be in good standing? ..... n/a

*Karen M. Bullen* / 3/27/96 *Orang P. [Signature]* / 3/27/96  
 Permit Engineer Date Team Leader Date

3/19/96



**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:** Karen Bullard

**VOICE:** (512) 239-6142

**FAX:** (512) 239-1300

**FROM:** Brian K. Murphy

**VOICE:** (210) 698-5208 or DSN 471-7453

**FAX:** (210) 221-7386 or DSN 471-7386

**RE:** Permit No. 29466 Draft Permit Conditions Acceptance

Number of pages including cover sheet: 1

**Comments:**

CSSA concurs with the fax sent by the TNRCC on 14 March 1996 by Ms. Karen Bullard that states the most recent permit special conditions.

Should you have any comments or require any other information please contact me.

Thanks,  
  
Brian



# FAX TRANSMITTAL

DATE: 3/14/96 NUMBER OF PAGES (including this cover sheet:

5

TO: Name Ken Rice/Brian Murphy  
Organization Parson's Engineering/Camp Stanley  
FAX Number (512) 719-6099 [(210) 221-7488]

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Name Karen M. Bullard  
Division/Region Office of Air Quality/NSR  
Division\Coatings Section  
Telephone Number 512-239-6142  
FAX Number 512-239-1300

## NOTES:

Attached is the draft permit for your approval. I need a confirmation fax from Camp Stanley that this is acceptable. There are two things that have changed in this draft of the permit:

1. The material usage limitations are deleted. Since you already have chemical flexibility, these are not necessary for you to stay in compliance with your permit as long as you do not exceed the emission limitations in the MAERT.
2. I added a additional recordkeeping requirement for you to demonstrate that the chemical flexibility requirement will be adhered to whenever a substitution is made.

Please call me at the number above if you have any questions.

Thanks,

Karen.



March 12, 1996

*Via facsimile (512) 239-1330*

Karen M. Bullard  
TNRCC Office of Air Quality  
NSR Division/Coatings Section  
P.O. Box 13087  
Austin, TX 78711-3087

Re: Air Permit No. 29466 Solvent Usage Rates for Camp Stanley Storage Activity  
(CSSA)

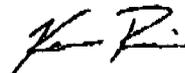
Dear Karen:

Per our telephone conversation yesterday, Parsons Engineering Science, Inc. is providing information, on behalf of CSSA, to clarify materials usage at CSSA Cleaning Vats #1 through #4 (EPNs 1-3) and Fingerprint Removal Tank (EPN 4). The air permit application and subsequent modeling effort were submitted with the identification of materials used in these units inadvertently reversed. The permit indicated that the Cleaning Vats [EPNs 1-3] use mineral spirits when in fact they use stoddard solvent, and the Fingerprint Removal Tank [EPN 4] was indicated as using stoddard solvent when in fact it uses mineral spirits.

Because of the similarity of the materials (e.g., they both have the same ESL, are petroleum distillates, etc.), CSSA would like to alter their permit to reflect actual material usages within the Cleaning Vats and the Fingerprint Removal Tank. CSSA proposes to change the material usage designation with no increase in total VOC emissions from any emission point listed on the maximum allowable emission rates table. Attached are supporting data and calculations that would reflect the material usage changes for EPNs 1 through 4.

After you have reviewed this information, I would like to discuss the most appropriate method for changing the material usage rates within the permit. Please feel free to call me with questions or comments at 512/719-6000.

Sincerely,



Ken Rice  
Senior Engineer

cc: Brian Murphy, CSSA  
Julie Burdey, Parsons ES Austin



CPQ421VZ1460XMB CSSA.DOC



**PHYSICAL CHARACTERISTICS DATA**

	Mineral Spirits	Stoddard Solvent
TNRCC ESL <u>short term</u> (April 10, 1995) ( $\mu\text{g}/\text{m}^3$ )	3500	3500
<u>long term</u> ( $\mu\text{g}/\text{m}^3$ )	350	350
Specific Gravity	0.811	0.780

Back calculation of allowable material usage rates from the maximum Allowable Emission Rates Table (MAERT)

$$\text{Solvent vat material usage limitations} = \frac{(\text{VOC}_A)(C)}{(f_{\text{voc}})(Sg)(Pw)}$$

where

$\text{VOC}_A$  = Annual VOC emission limits allowed by the MAERT (tons/year)

$f_{\text{voc}}$  = Fraction of solvent emitted =  $1 - \frac{\text{Material Output}}{\text{Material Input}}$

$Sg$  = Specific gravity of the product, (unitless)

$Pw$  = Density of water, (lb/gallon)

$C$  = Pounds to tons conversion, (2,000 lb/ton)

**EPN #1 - Cleaning Vat #1 (with stoddard solvent)**

$$\text{Material Usage} = \frac{(0.48)(2000)}{(1 - \frac{153}{200})(0.78)(8.3346)} = 590 \text{ gal / year}$$

**EPN #2 - Cleaning Vats #2 and #3 (with stoddard solvent)**

$$\text{Material Usage} = \frac{(0.58)(2000)}{(1 - \frac{20}{30})(0.78)(8.3346)} = 535 \text{ gal / year}$$

**EPN #3 - Cleaning Vat #4 (with stoddard solvent)**

$$\text{Material Usage} = \frac{(0.53)(2000)}{(1 - \frac{100}{150})(0.78)(8.3346)} = 652 \text{ gal / year}$$

Total stoddard solvent usage rates (EPNs 1-3) 1,777 gallons/year

**EPN #4 - Fingerprint Remover Tank (with mineral spirits)**

$$\text{Material Usage} = \frac{(0.53)(2000)}{(1 - \frac{100}{133})(0.811)(8.3346)} = 486 \text{ gal / year}$$

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



*file*

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*  
February 15, 1996

Colonel Dean C. Schmelling  
Post Commander  
DEPARTMENT OF THE ARMY  
CAMP STANLEY  
25800 Ralph Fair Road  
Boerne, Texas 78006

Re: Permit No. 29466  
Cold Solvent Cleaning Facility  
Boerne, Bexar County  
Account ID No. BG-0841-S

Dear Colonel Schmelling:

This is in response to your permit application, Form PI-1, concerning the above-referenced facility. We appreciate your cooperation in sending us the information necessary to evaluate your proposal. In addition, the above referenced permit is complete as of December 20, 1995.

A permit for your new facility is enclosed. The permit contains several general and special conditions that define the level of operation and allowable emissions. In addition, the construction and operation of the facility must be as represented in the application.

We have enclosed two operations certification forms (Form PI-3A and Form PI-3B). In 30 TAC Section 116.110(b) (Regulation VI), you are required to certify that operations addressed in this permit are in conformance with representations in the permit application. Please file these certifications with both the Texas Natural Resource Conservation Commission (TNRCC) Austin New Source Review Division and the appropriate TNRCC Regional Office in a timely manner as prescribed by rule.

Thank you for your cooperation and interest in air pollution control. If you have any questions, please contact Ms. Karen M. Bullard of our Office of Air Quality, New Source Review Division at (512) 239-6142.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dan Pearson".  
Dan Pearson  
Executive Director

DP/KB/lp

Enclosures

cc: Mr. James Menke, Air Program Manager, San Antonio

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



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New Source Review Division (MC-162)  
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\_\_\_\_\_  
Technical Contact: (Person, Title, Mailing Address) \_\_\_\_\_  
\_\_\_\_\_  
Telephone: ( ) \_\_\_\_\_ - \_\_\_\_\_ Fax: ( ) \_\_\_\_\_ - \_\_\_\_\_

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Permit Unit Name: \_\_\_\_\_  
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Date for start of construction: \_\_\_\_\_  
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I, \_\_\_\_\_  
Name - please print or type Title - Owner, Plant Manager, President, Vice President, Environmental Director  
state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge. I certify that the facilities or changes authorized by the referenced permit have been accomplished as represented, if those representations affect emissions, method of control, or character of emissions.

DATE \_\_\_\_\_ SIGNATURE \_\_\_\_\_  
Note: Original signature in ink required.

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FORM PI-3B

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Mailing Address: \_\_\_\_\_  
Technical Contact (Person, Title, Mailing Address): \_\_\_\_\_  
Telephone: (     ) \_\_\_\_\_ - \_\_\_\_\_ Fax: (     ) \_\_\_\_\_ - \_\_\_\_\_

III. Permit Unit Information

Permit Unit Name: \_\_\_\_\_  
Location: (Nearest City) \_\_\_\_\_ County: \_\_\_\_\_

IV. Construction and operating dates for units affected by this permit approval:

\_\_\_ Check here if no construction is associated with the approved project (*go to Section V if checked*).  
\_\_\_ Check here if portions of the approved project have begun or will begin operation before construction is complete (i.e., phased construction); in this case, please submit separate Forms PI-3A and PI-3B for each phase, with construction and operating dates applied to the phase. Describe phase or portion of the project for which this certification is filed:

Date for start of construction: \_\_\_\_\_  
Date for completion of construction: \_\_\_\_\_  
Date for start of operation: \_\_\_\_\_

V. A copy of this certification must be sent to the appropriate TNRCC Regional Office (*please send original to the agency address shown at top of this form*).

Regional Office (city) sent to: \_\_\_\_\_

VI. Certification

I, \_\_\_\_\_  
Name - please print or type Title - Owner, Plant Manager, President, Vice President, Environmental Director

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge. I certify that the facility complies with all terms of the preconstruction permit and that operations of the facility are in compliance with the Texas Clean Air Act (Chapter 382, Texas Health & Safety Code) and the rules of the TNRCC.

DATE \_\_\_\_\_

SIGNATURE \_\_\_\_\_

Note: Original signature in ink required.



# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

## AIR QUALITY PERMIT

A PERMIT IS HEREBY ISSUED TO

DEPARTMENT OF THE ARMY-CAMP STANLEY

AUTHORIZING THE CONSTRUCTION AND OPERATION OF A

Cold Solvent Cleaning Facility

LOCATED AT

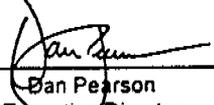
Boerne, Bexar County, Texas

LATITUDE 29° 40' 35" LONGITUDE 098° 37' 52"



1. The facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Executive Director of the Texas Natural Resource Conservation Commission (TNRCC or Commission) to amend this permit in that regard and such amendment is approved. (30 TAC 116.116)
  2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of date of issuance, discontinues construction for more than 18 consecutive months prior to completion, or fails to complete construction within a reasonable time. Upon request, the Executive Director may grant a onetime 18-month extension of the date to begin construction. (30 TAC 116.115(b)(1))
  3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the TNRCC not later than 15 working days after occurrence of the event. (30 TAC 116.115(b)(2))
  4. **Start-up Notification.** The appropriate Air Program Regional Office of the Commission shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the TNRCC may be present. Phased construction, which may involve a series of units commencing operations at different times, shall provide separate notification for the commencement of operations for each unit. (30 TAC 116.115(b)(3))
  5. **Sampling Requirements.** If sampling of stacks or process vents is required, the permit holder shall contact the TNRCC Office of Air Quality prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the Executive Director and coordinated with the regional representatives of the Commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. (30 TAC 116.115(b)(4))
  6. **Equivalency of Methods.** It shall be the responsibility of the permit holder to demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the Executive Director prior to their use in fulfilling any requirements of the permit. (30 TAC 116.115(b)(5))
  7. **Recordkeeping.** A copy of the permit along with information and data sufficient to demonstrate compliance with the permit shall be maintained in a file at the plant site and made available at the request of personnel from the TNRCC or any air pollution control program having jurisdiction. For facilities that normally operate unattended, this information shall be maintained at the nearest staffed location within Texas specified by the permit holder in the permit application. This information shall include, but is not limited to, production records and operating hours. Additional recordkeeping requirements may be specified in special conditions attached to the permit. Information in the file shall be retained for at least two years following the date that the information or data is obtained. (30 TAC 116.115(b)(6))
  8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions listed in the table entitled "Emission Sources - Maximum Allowable Emission Rates" shall not exceed the values stated on the table attached to the permit. (30 TAC 116.115(b)(7))
  9. **Maintenance of Emission Control.** The facilities covered by the permit shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. Notification for upsets and maintenance shall be made in accordance with §101.6 and §101.7 of this title (relating to Notification Requirements for Major Upset and Notification Requirements for Maintenance). (30 TAC 116.115(b)(8))
  10. **Compliance with Rules.** Acceptance of a permit by a permit applicant constitutes an acknowledgement and agreement that the holder will comply with all rules, regulations, and orders of the Commission issued in conformity with the Texas Clean Air Act and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition are applicable, then the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of Commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. (30 TAC 116.115(b)(9))
  11. This permit may be appealed pursuant to Section 263.36 of the General Rules of the TNRCC and Section 382.032 of the TCAA. Failure to take such appeal constitutes acceptance by the applicant of all terms of the permit. (Tex. Gov't. Code Ann. § 2001, et seq.)
  12. This permit may not be transferred, assigned or conveyed by the holder except as provided by rule. (30 TAC 116.110(c))
  13. This permit expires 10 years from date of issuance unless renewed as provided in Section 382.055 of the TCAA unless a shorter time period is specified in the special conditions of this permit.
  14. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. (30 TAC 116.115(c))
- Emissions from this facility must not cause or contribute to a condition of 'air pollution' as defined in Section 382.003(3) of the Texas Clean Air Act (TCAA) or violate Section 382.085 of the TCAA. If the Executive Director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

PERMIT 29466  
DATE 2-15-96  
PERMIT GEN \_\_\_\_\_

  
Dan Pearson  
Executive Director  
Texas Natural Resource Conservation Commission



## SPECIAL CONDITIONS

Permit No. 29466

### GENERAL

1. This permit authorizes the construction and operation of a Cold Solvent Cleaning Facility at Building 90 in Boerne, Bexar County. Sources covered by this permit include Solvent Vat Nos. 1 through 4, the Volatile Corrosion Inhibitor (VCI) Vat, the Fingerprint Remover (FR) Tank, and the Solvent Recovery Unit.

This permit does not cover the other sources of emissions at this site including two paint booths, five storage tanks, two steel shot abrasive cleaners, the gun bluing shop, four standby generators, three boilers, wastewater treatment equipment, and the gun room. These other sources of emissions are covered by Standard Exemption Nos. 75, 86, 102, 41, 5, 7, and 61, respectively. The gun room is a grandfathered source.

2. Within 30 days of the date of this permit, all emission points corresponding to the emission point identification numbers on the maximum allowable emission rates table (MAERT) shall be physically identified (by tagging, labeling, engraving, etc.)

### EMISSION LIMITS

3. Opacity of emissions from any emission point must not exceed 5 percent averaged over a six-minute period, except for those periods described in 30 TAC Section 111.111(a)(1)(E) (Regulation I). Opacity shall be determined using Environmental Protection Agency Reference Method 9.

### OPERATIONAL LIMITATIONS

4. Solvent Vat Nos. 1 through 4, the VCI, and the FR Tank (hereafter referred to as "the cleaners") shall be equipped as follows:
  - A. Covers shall be provided for the cleaners which shall be kept closed whenever parts are not being handled in the cleaners.
  - B. An internal-cleaned parts drainage rack shall be provided for enclosed draining under the cover.
  - C. The solvent spray system shall produce a solid stream and not an atomized or shower spray. The spray system shall operate at a pressure of 10 pounds per square inch gauge or less, as necessary, to prevent splashing above the freeboard.

SPECIAL CONDITIONS

Permit No. 29466

Page 2

D. The solvents used in the cleaners shall not be heated above 120 °F.

5. The cleaners shall be operated as follows:

A. The cleaning solvents to be used in the cleaners shall be limited to the types and amounts listed below.

<u>Solvent</u>	<u>Usage (gallons/year)</u>
Ferro Pak B VCI Solution	500
Mineral Spirits	1,500
Stoddard Solvent	500

Other brands of VCI solution may be substituted; however, they must contain isopropyl alcohol (IPA) as the only volatile organic compound (VOC). Additionally, emissions of IPA must not exceed the limits represented in the permit application.

B. A permanent, conspicuous label with the following operating procedures shall be posted on or near the cleaning units. These operating procedures shall be strictly followed.

- (1) Covers shall be closed at all times, except when processing workloads through the cleaning units.
- (2) Parts shall be allowed to dry within the cleaner freeboard area for at least 15 seconds or until visibly dry.
- (3) Waste solvents shall not be disposed of or transferred to another party such that the waste solvent will evaporate into the atmosphere. Waste solvent shall be stored only in covered containers

C. All doors and other openings leading from the weapons cleaning area in Building 90 shall be kept closed at all times, except to allow transit of equipment and personnel.

CHEMICAL FLEXIBILITY

6. This permit allows the substitution of VOC-containing products that meet the following conditions:

SPECIAL CONDITIONS

Permit No. 29466

Page 3

- A. Any new or replacement compound is listed on the Texas Natural Resource Conservation Commission Toxicology and Risk Assessment Effects Screening Level (ESL) list dated April 10, 1995.
- B. Any new or replacement compound emitted at rates of less than 0.04 pounds per hour shall be exempt from parts A and C of this condition.
- C. Emissions of new or replacement VOC and particulate compounds shall satisfy the following equation:

$$ER_1 * 1250 \mu\text{g}/\text{m}^3 + ER_2 * 1477 \mu\text{g}/\text{m}^3 + ER_3 * 869 \mu\text{g}/\text{m}^3 + ER_4 * 1074 \mu\text{g}/\text{m}^3 + ER_5 * 1117 \mu\text{g}/\text{m}^3 \leq \text{ESL}$$

where:

- $ER_1$  = Maximum hourly emission rate of new compound from the VCI Vat and Cleaning Vat No. 1.
- $ER_2$  = Maximum hourly emission rate of new compound from Cleaning Vat Nos. 2 and 3.
- $ER_3$  = Maximum hourly emission rate of new compound from Cleaning Vat No. 4.
- $ER_4$  = Maximum hourly emission rate of new compound from the fingerprint remover tank.
- $ER_5$  = Maximum hourly emission rate of new compound from the solvent recovery unit.
- ESL = The 30-minute ESL of the new compound.

- D. This condition allows for changes in product formulations and does not allow for any increase in total emissions from any emission point listed on the MAERT.

RECORDKEEPING

- 7. A recordkeeping system shall be devised and implemented which demonstrates compliance with the emission limits on the MAERT. At a minimum, records shall contain the following information:
  - A. Material Safety Data Sheets for materials currently in use and those used during the previous two years. Records are only required for materials with the potential to emit air contaminants.

SPECIAL CONDITIONS

Permit No. 29466

Page 4

- B. Records shall indicate material usages of all raw materials specified in part A of this condition.
  - C. Information from parts A and B of this condition shall be used to generate a monthly report containing the following information:
    - (1) The VOC emissions from all emission point numbers in pounds per hour on a daily basis and tons per year over the previous 12 months. Hourly emission rates may be calculated as daily VOC usage divided by actual hours of operation.
    - (2) Total material usage for the previous 12 months.
8. All records shall be maintained for the most recent 24 months in a central location at Building 90.

HOUSEKEEPING

- 9. All chemical spills shall be cleaned up promptly using appropriate cleanup procedures.
- 10. All equipment covered by this permit shall be operated and maintained in accordance with the manufacturer's instructions.
- 11. Materials that have been used for cleaning shall be stored in sealed containers for proper disposal.

Dated 2-15-96

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit No. 29466

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these sources.

### AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY
EPN 1	VCI Vat and Cleaning Vat No. 1	VOC	0.70	1.28
EPN 2	Cleaning Vat Nos. 2 and 3	VOC	0.34	0.58
EPN 3	Cleaning Vat No. 4	VOC	0.29	0.48
EPN 4	Fingerprint Remover Tank	VOC	0.28	0.53
EPN 5	Solvent Recovery Unit	VOC	0.11	0.18

- (1) Emission point identification
- (2) Specific point source name
- (3) VOC - volatile organic compounds as defined in General Rule 101.1

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52 or Hrs/year

Dated 2-15-96



NEW SOURCE  
TECHNICAL REVIEW & SOURCE REVIEW ANALYSIS

Permit No. : 29466 Record No.: 36549 Project Type : CRVW  
Company: DEPARTMENT OF THE ARMY-CAMP STANLEY Account No. : BG-0841-S  
City: BOERNE County: Bexar  
Facility Name: Cold Solvent Cleaning Engineer: Karen M. Bullard

AUTHORIZATION CHECKLIST (any "Yes" requires signature by Executive Director):

This is a denial or application voidance. \_ Yes x No  
A new policy/precedent will be established. \_ Yes x No  
Projected emissions are  $\geq 2X$  the ESL(s). \_ Yes x No  
A public meeting or hearing was requested. \_ Yes x No  
A state or local official is interested. \_ Yes x No  
Waste- or tire-derived fuel is involved. \_ Yes x No  
Waste management facilities are involved. \_ Yes x No

REGULATION VI RULES

116.111(3) Will facility utilize BACT? . . . . . yes  
116.111(6) Expected to perform as represented in application? . . . . . yes  
116.140 Permit Fee: \$ 450 Certification provided? . . . . . yes

SAMPLING AND TESTING:

116.111(1)  
Are emissions expected to comply with all TNRCC air quality Rules & Regs, and the intent of the  
TEXAS CLEAN AIR ACT? . . . . . yes  
116.111(2)  
Will emissions be measured? . . . . . yes  
Method: Recordkeeping of usage

FEDERAL PROGRAM APPLICABILITY:

116.111(4) Compliance with applicable NSPS expected? . . . . . n/a  
116.111(5) Compliance with applicable NESHAPS expected? . . . . . n/a  
116.111(7) Nonattainment (NA) review required? . . . . . no  
A. Is facility located in a NA area? . . . . . no  
116.111(8) PSD applicable? . . . . . no  
A. Federal major source (100/250 TPY)? . . . . . no  
B. Federal major modification? . . . . . no

PUBLIC NOTICE INFORMATION:

116.130-137 Public notification required? . . . . . yes  
If NO, reason:  
A. Application rec'd: 6/9/95. Application comp: 12/20/95  
B. Preliminary determination . . . . . issue  
C. PN - Mailed: 6/23/95  
D. Pollutants: Carbon compounds  
E. Published: 8/16/95 & 8/23/95 in Boerne Star  
F. Bilingual public notification required? . . . . . yes  
Language: Spanish  
Published: 8/11/95 and 8/18/95 in La Prensa De San Antonio  
G. No. of public comments? . . . . . one  
Technical Issues? Yes, discussed health effects of the solvent emissions from Camp Stanley.  
HEARING requested? . . . . . no Hearing held? . . . . . n/a  
MEETING requested? . . . . . no Meeting held? . . . . . n/a

G. Comments: Mr. and Mrs. Srp of the nearby Fair Oaks I ...ote to ask for more information on this permit. I discussed the permitting process and the level of emissions at Camp Stanley with Mr. Srp via telephone on 8/29/95. He seemed to understand the situation well and was satisfied that the emissions from Camp Stanley would not be a hazard or nuisance to him. As a result, Mr. Srp requested that he not be notified of any further action on this permit.  
 H. Certification of sign posting according to 116.133? . . . . . 10/19/95

REQUEST FOR COMMENTS:

			REMARKS:
REGION <u>13</u>	: x	Reviewed by:Edgar Sawyer	8/30/95
LOCAL-CITY	: n/a	Reviewed by:	
COUNTY	: n/a	Reviewed by:	
TARA	: x	Reviewed by:Torin McCoy	1/17/96
COMP	: x	N.C.A.P. by:Lance Owens	6/21/95
LEGAL	: n/a	N.L.A.P. by:	

REVIEW SUMMARY:

A. MISCELLANEOUS:

- 1). NOV issued for construction without a permit? . . . . . no
- 2). NOV resolved by issuance of permit? . . . . . n/a
- 3). Applicant in agreement with special provisions? . . . . . yes
  - Company representative? **Brian Murphy**
  - Contacted via?fax and telephone Date? 1/31/96
- 4). Franchise Tax verified in good standing? . . . . . n/a
  - Not required for U.S. government facilities

B. PROJECT OVERVIEW: The Department of the Army - Camp Stanley is requesting a permit to operate a weapons cleaning facility in Bexar county. This permit will authorize emissions totaling 3.05 TPY VOC. Although the current operations would qualify for standard exemption, Camp Stanley wants a permit so that they will have the flexibility to amend it in the future to allow solvent usage in excess of that allowed by standard exemption. In addition, Camp Stanley wants chemical flexibility written into the permit.

C. PROCESS DESCRIPTION: This permit will authorize solvent recovery and cold solvent cleaning of military weapons and weapon parts.

Solvent Vats 1 through 4:

These vats are Cold-cleaning dip tanks utilizing a mineral spirits-based solvent to clean individual parts of military weapons. Vats one, three, and four have capacities of 225 gallons, while vat two has a 35 gallon capacity. Dirty weapons parts are submerged in the solvent and allowed to soak. Vat two is equipped with a solid-stream hose to provide additional cleaning, while the solvent in the other vats are slightly agitated to ensure thorough cleaning of parts.

Cleaned parts are removed from the solvent and placed in an internal drainage rack where they are allowed to dry until solvent dripping has ceased. When parts are thoroughly dry, they are removed from the drainage rack.

The VCI vat is a cold-cleaning dip tank that utilizes a solution comprised primarily of non-volatile paraffinic oil and isopropyl alcohol to treat individual parts of military weapons to protect them from corrosion. The vat has a maximum capacity of 225 gallons. Weapons parts are submerged in the VCI solution and allowed to soak. The solvent in the vat is slightly agitated to ensure thorough coating of parts.

Coated parts are removed from the solvent and placed in an internal drainage rack where they are allowed to dry until solvent dripping has ceased. When parts are thoroughly dry, they are removed from the drainage rack.

Fingerprint Remover Tank:

The FR tank is a cold-cleaning dip tank that utilizes Stoddard solvent to remove fingerprints from individual parts of military weapons. The tank has a maximum solvent capacity of 225 gallons. Dirty weapons parts are submerged in the solution and allowed to soak. The solvent in the vat is slightly agitated to ensure thorough cleaning of parts.

Coated parts are removed from the solvent and placed in an internal drainage rack where they are allowed to dry until solvent dripping has ceased. When parts are thoroughly dry, they are removed from the drainage rack.

Solvent Recovery Unit:

The solvent recovery unit is used to recover spent solvent (mineral spirits) from vats one through four. Spent solvent is collected from each vat in a 55-gallon drum. Solvent is then pumped from the drum to a distillation unit. The distillation unit separates the pure solvent from the impurities (sludge.) Reclaimed solvent is collected in a clean, empty 55-gallon drum.

D. SOURCES AND CONTROLS: The solvents in the six vats and the distillation unit are the permitted sources of emissions at this plant. Emissions from the cold cleaning units are controlled by requiring the operational and equipment limitations listed in Regulation V for degreasers. These requirements are as follows:

1. Covers are kept closed whenever parts are not being handled in the cleaners.
2. An internal cleaned-parts drainage rack is provided for enclosed draining under the cover.
3. Solvent spray systems produce a solid stream and not an atomized or shower spray. The spray systems operate at a pressure of 10 psig or less as necessary to prevent splashing above the freeboard.
4. Parts are allowed to dry in the freeboard area for at least 15 seconds or until visibly dry.
5. Doors or other openings leading from the weapons-cleaning area are kept closed except to allow transit of equipment and personnel.
6. In lieu of the freeboard ratio requirement, solvents are not heated above 120F (as required in the exemption to this Reg. V requirement.)

E. BACT: The controls described above meet BACT requirements for a facility of this type and size.

F. IMPACTS EVALUATION:

- 1). Was modeling done? yes                      Type? full dispersion
- 2). Will GLC of any air contaminant cause violation of AAQS? . . . . . no
- 3). Is this a sensitive location with respect to nuisance? . . . . . no

4). Is site within 3000 feet of school? ..... no

5). **Toxics Evaluation:** Isopropyl alcohol, mineral spirits, and Stoddard solvent are the only contaminants evaluated for this permit. The maximum ground level off-property concentrations for all chemicals are predicted to be below the respective ESLs. The Toxicology section does not expect emissions from this plant to cause harm to the surrounding community.

G. COMPLIANCE HISTORY: Camp Stanley has no record of complaints or NOV's at this plant.

<u>Karen M. Rolland</u>	<u>1/31/96</u>	<u>Craig Redaides</u>	<u>2/1/96</u>
Permit Engineer	Date	Team Leader	Date

# Request for Comments to Toxicology & Risk Assessment Section

J T McCoy

Date Submitted: January 17, 1996  
 Permit No.: 29466 TARA Control No.: 4276  
 Company Name: DEPARTMENT OF THE ARMY-CAMP STANLEY  
 Street, City, County: 25800 Ralph Fair Road Boerne, Bexar County  
 Type: COLD SOLVENT CLEANING  
 Permit Engineer: Karen M. Bullard

RUSH  
  
 Facility

Circle One: New Source      Circle One: Refined Model

## IMPACTS SUMMARY\*

Chemical	CAS No.	One Hour					Annual			Plant wide Modeling (Y/N)
		GLC <sub>max</sub> <sup>(1)</sup>	λ <sub>max</sub> <sup>(2)</sup>	ESL <sup>(3)</sup>	GLC <sub>r</sub> <sup>(4)</sup>	λ <sub>r</sub> <sup>(5)</sup>	GLC <sub>max</sub> <sup>(1)</sup>	ESL <sup>(3)</sup>	GLC <sub>r</sub> <sup>(4)</sup>	
isopropyl alcohol		516		7856 ✓	42					y
mineral spirits		1232		3500 ✓	91					y
Stoddard solvent		292		3500 ✓	27					y

Are there other sources at the plant emitting the same chemicals? (If so, please describe.) no

Controls (specify): none

General Comments: \_\_\_\_\_

*Please Answer the following questions only if the GLC<sub>max</sub> is greater than the ESL.*

What is the land use where the maximum GLC occurs? \_\_\_\_\_

Is the surrounding land zoned industrial? \_\_\_\_\_ Is there a school within 3,000 feet (Y/N)? \_\_\_\_\_

Distance to Nearest Receptor: \_\_\_\_\_

Circle type of Receptor: School, Residence, Other (If other, please describe.) \_\_\_\_\_

**For TARA Use Only:**

Recommendation:  For or Against  See Attached Memorandum

Toxicology & Risk Assessment Reviewer: J T McCoy Date Completed: 1/17/96

- <sup>(1)</sup>GLC<sub>max</sub> = Maximum Off-Property Ground Level Concentration (μg/m<sup>3</sup>).
- <sup>(2)</sup>λ<sub>max</sub> = Number of times GLC<sub>max</sub> exceeds the ESL (hours/year) at receptor where GLC<sub>max</sub> occurs.
- <sup>(3)</sup>ESL = Effects Screening Level (μg/m<sup>3</sup>)
- <sup>(4)</sup>GLC<sub>r</sub> = Ground Level Concentration at Maximally Affected Sensitive Receptor (μg/m<sup>3</sup>). Supply this information only if the GLC<sub>max</sub> is greater than the ESL.
- <sup>(5)</sup>λ<sub>r</sub> = Number of times ESL is exceeded (hours/year) at receptor where GLC<sub>r</sub> occurs.

\*The CAS No. and ESL are listed as an option for the permit engineer to include in the table. If the ESL is not available, please provide the CAS No.

**TARA Approval Stamp:**

I have reviewed the emissions described above and my review indicates that the operation of this facility will not be detrimental to public health.  
J T McCoy 1/17/96  
 Toxicology & Risk Assessment Section





# FAX TRANSMITTAL

DATE: 1/16/96 NUMBER OF PAGES (including this cover sheet:

6

TO: Name Glynnis Fowler (Brian Murphy)  
Organization Fowler Consulting (Camp Stanley)  
FAX Number (512) 255-2585 [(210) 221-7463]

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
Name Karen M. Bullard  
Division/Region Office of Air Quality/NSR  
Division\Coatings Section  
Telephone Number 512-239-6142  
FAX Number 512-239-1330

NOTES:

I have enclosed the latest version of the draft permit. Please let me know if there are any further changes.

Thank you,

Karen.



## Fax Transmission

**Date:** 1/16/96  
**To:** Anwan Miah, Air Modeling  
TNRCC  
**Phone:** (512) 239-1979  
**Fax:** (512) 239-1500  
**cc:** Karen Bullard, Air Permitting  
TNRCC  
**Phone:** (512) 239-6142  
**Fax:** (512) 239-1300  
**cc:** Brian Murphy  
Camp Stanley Storage Activity  
**Phone:** (210) 698-5208  
**Fax:** (210) 221-7463  
**cc:** Susan Robertson  
Parsons Engineering Science  
**Phone:** (512) 719-6099  
**Fax:** (512) 719-6000  
**From:** Glynis Fowler  
Fowler Consulting  
**Phone:** (512) 255-2585  
**Fax:** (512) 255-5660



**No. of pages including cover page:** 2

### Message:

Per our telephone discussion this morning, attached is a copy of the revised Table 1a for the Camp Stanley Air Quality Analysis which was submitted in December, 1995. This Table 1a has been revised to reflect the increased annual emissions resulting from the applicant's request to increase annual usage rates of solvents. For your information, the original annual usage of isopropyl alcohol has increased from 155 to 500 gal/yr, the annual usage of mineral spirits has increased from 530 to 1500 gal/yr, and the annual usage of Stoddard Solvent has increased from 155 to 500 gal/yr. Short-term solvent usage rates and emission rates remain unchanged. The UTM coordinates have also been revised according to the updated plot plan and aerial photo which were submitted with the Air Quality Analysis. Thank you for your prompt review of the modeling. Please call me with any questions.

Please call if you experience any transmission problems.



PERMIT NO. \_\_\_\_\_ PERMIT TYPE: CONSTRUCTION (X) AMENDMENT ( ) REVISION ( ) RENEWAL ( )  
 ACCOUNT ID NO. \_\_\_\_\_

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

TABLE 1(a)  
EMISSION SOURCES

AIR CONTAMINANT DATA										EMISSION POINT DISCHARGE PARAMETERS					
EMISSION POINT (1)	CHEMICAL COMPOSITION OF TOTAL STREAM	AIR CONTAMINANT EMISSION RATE	UTM COORDINATES OF EMISSION PT. (2)	SOURCE HEIGHT ABOVE GROUND (R1)	SOURCE HEIGHT ABOVE STRUCT. (R2)	STACK SOURCES (7)	EXIT DATA			PLUM SOURCE					
							COMPONENT OR AIR CONTAMINANT NAME (2)	CONC. (MG/D3)	#HR (4)		TONS/YR (5)	EA (R3)	VEL (FEET) (8)	TEMP (F) (9)	LENGT (FT) (10)
EPN 1 <i>(horizontal)</i>	BLDG. 90 VCI VAT	VOC (100% ISO-PROPYL ALCOHOL)	<0.001	0.4128	0.2456	0.7887	14	535697.1	3283769.0	11.50	-	L=0.8 3	9.12	AMB	
	BLDG. 90 SOLVENT VAT 1	VOC (100% MINERAL SPIRITS)	<0.001	0.2816	0.4090	0.4783	14	535745.6181	3283542.781	11.50	-	L=0.8 3	9.12	AMB	
	TOTAL VOC		<0.001	0.6942	0.4466	1.277	14	535745.6181	3283542.781	11.50	-	L=0.8 3	9.12	AMB	
EPN 2 <i>(horizontal)</i>	BLDG. 90 SOLVENT VATS 2 /	VOC (100% MINERAL SPIRITS)	<0.001	0.3380	0.2028	0.5746	14	535746.1580	3283541.857	8.46	-	L=0.8 3	9.12	AMB	
EPN 3 <i>(horizontal)</i>	BLDG. 90 SOLVENT VAT 4	VOC (100% MINERAL SPIRITS)	<0.001	0.2816	0.1690	0.4783	14	535745.6181	3283542.781	17.21	1.0	L=1.4 3	18.4	AMB	
EPN 4 <i>(horizontal)</i>	BLDG. 90 FINGERPRINT REMOVER	VOC (100% STODDARD SOLVENT)	<0.001	0.2709	0.1625	0.5292	14	535745.6181	3283542.781	17.29	1.08	L=1.33 3	21.4	AMB	
EPN 5 <i>(dormitory)</i>	BLDG. 90 SOLVENT RECOVERY UNIT	VOC (100% MINERAL SPIRITS)	<0.001	0.1031	0.0618	0.1799	14	535745.6181	3283542.781	GRND. LEVEL					

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 1200  
 STANDARD CONDITIONS ARE 89°F AND 14.7 PSIA (RULE 131.01.00.001 (50))

*Revised 1/16/96 GHF*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
 FORM PI-1, GENERAL APPLICATION -- AIR QUALITY PERMIT



A PERMIT TO CONSTRUCT MUST BE APPROVED BEFORE ANY ACTUAL WORK IS BEGUN ON THE FACILITY. This is not a stand alone document. Please refer to the "Form PI-1, Permit Application Instructions" manual (Instructions) for specific details to complete this application. Please print or type all information. All information requested herein must be completed and submitted before public notification procedures may be authorized. Please contact the CORE Section of the New Source Review Program with any questions at 512/908-1000 (FAX No. 512/908-1300). Written inquiries may be addressed to: Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Program, P.O. Box 13087, Austin TX 78711-3087.

VERY IMPORTANT!

- Is CONFIDENTIAL information being submitted with this application? [ ]-YES [X]-NO  
 If YES, is each "confidential" page so marked in big red letters? [ ]-YES [ ]-NO
- Has a CORE checklist been attached to this application? ..... [X]-YES [ ]-NO
- Is this application in response to, or related in any way to, a Notice of Violation at this location? [ ]-YES [X]-NO. If YES, date of Notice of Violation: \_\_\_\_\_  
 Also, if YES, pursuant to Rule: \_\_\_\_\_

Please furnish the following information pertaining to this facility SITE:

1. Please estimate the net number of new jobs which will be created in the community as a result of the operation of the facility authorized by this application: 0
2. Name of elected State Senator: Phil Graham and Kay Bailey Hutchison
3. Name of elected State Representative: Jake Pickle and Lamar Smith

Please furnish the following information pertaining to Compliance History:

Submit a 5-year Compliance History in accordance with Regulation VI, Rule 116.120-116.126 for all facilities classified in Sections V.C and V.D of Form PI-1 below.

- I. TYPE OF APPLICATION: [X]-CONSTRUCTION PERMIT [ ]-AMENDMENT, Permit No. \_\_\_\_\_
- A. PERMIT ISSUED TO: Department of the Army, Camp Stanley  
(Entity legally responsible for permit; i.e., Owner or Operator of the facility)  
 Permittee's Texas State Comptroller's Tax ID No.: N/A - Federal Facility  
 Permittee's address (Person, Title, Address): LTC Dean C. Schmelling, Post Commander, 25800 Ralph Fair Rd., Boerne, TX 78006  
 Telephone: (210) 221-7461 FAX: (210) 221-7488  
 Permittee's Technical Contact (Person, Title, Address): LTC Dean C. Schmelling, Post Commander  
 Telephone: (210) 221-7461 FAX: (210) 221-7488
- B. OWNER OF FACILITY: Department of the Army  
(If different from permittee; include names of proprietor/general partner(s) if applicable)  
 Owner's Texas State Comptroller's Tax ID No.: N/A - Federal Facility  
 Owner's address (Person, Title, Address): Address same as previous - no single owner
- C. Principal Company Product or Business: United States Army Installation  
 Plant SIC Code: 9711

09529388

II. FACILITY PHYSICAL LOCATION:

- A. Name of plant or site: Department of the Army, Camp Stanley
- B. Street Address: 25800 Ralph Fair Rd.
- C. Nearest City: Boerne County: Bexar Site Zip Code: 78006
- D. Latitude: 29° 40' 35" N Longitude: 98° 37' 52" W (must be to nearest second)
- E. Plant Site TNRCC Air Quality Account Number: \_\_\_\_\_

III. FACILITY TYPE AND OPERATING SCHEDULE:

- A. Name of facility to be permitted: Department of the Army, Camp Stanley
- B. Facility Type (Check One): [X] Permanent, [ ] Portable.
- C. Facility Operating Schedule: (24) Hours/day; (7) Days/week; (52) Weeks/year  
 ( ) Seasonal - explain: \_\_\_\_\_
- D. Start Dates (Proposed/Actual): Construction: \*/ \*/ (P/A) \* >5 years ago  
 Operation: \*/ \*/ (P/A) \* >5 years ago

IV. FACILITY CLASSIFICATION (Check only one block):

- A. [X] New Permitted Facility - New grass roots facility at this location. (New Permit for existing facility)
- B. [ ] New Permitted Facility - Modification of existing non-permitted Facility.
- C. [ ] Amendment to Permitted Facility. Permit No(s) \_\_\_\_\_
- D. [ ] Change in Location of Permitted Facility. Permit No(s) \_\_\_\_\_  
 Location of Present Facility: \_\_\_\_\_

V. COMPLIANCE HISTORY (See attached Supplemental Information Sheet):

- A. [ ] Exemption claimed under Rule 116.121, or
- B. [X] Existing Site => 5 years old. TNRCC will compile Compliance History, or
- C. [ ] New Site (This is a new grassroots site with no operating history), or
- D. [ ] Existing Site < 5 years old.

If "C" or "D", does applicant have similar facilities in Texas? [ ]-YES [ ]-NO

1. If YES, list TNRCC Air Quality Account No.(s): \_\_\_\_\_
2. If NO, attached one of the following:
  - a. [ ] Compliance History for similar sites in other States. If none, then:
  - b. [ ] Compliance History as required by Regulation VI, Rule 116.122(b).

(Over)

RECEIVED  
 JUN 07 1995  
 REVENUES SECTION

VI. SUBMIT THE FOLLOWING GENERAL INFORMATION:

- A. Submit a current area map as specified in the Instructions.  
Are any schools located within 3000 feet of this facility? -YES -NO.
- B. Submit a plot plan of the plant property as specified in the Instructions.
- C. Submit emission data, including fugitive emissions and stack parameters, on Table 1(a). Attach emission calculations and information showing how emissions were determined. See Instructions for further details.
- D. Submit an analysis of Best Available Control Technology, including the estimated installed capital and operating costs for all abatement equipment associated with the facility. See Instructions for further details.

**VERY IMPORTANT!**

- E. Franchise Tax. Submit a copy of a Certificate of Good Standing from the State Comptroller's Office with each application if the permit is to be issued to a corporation. See Instructions if you are not a corporation or for further information.
- F. Permit Fee. Enclose required fee, fee certification and estimated capital cost (Table 30); or furnish explanation why fee is not required. (See Regulation VI Rule 116.141.) Exempt from franchise tax. Federal Facility permit fee enclosed

VII. SUBMIT (A) PROCESS FLOW DIAGRAM, (B) PROCESS DESCRIPTION AND (C) MATERIAL BALANCE AS SPECIFIED IN THE INSTRUCTIONS (see Instructions concerning submittal of confidential information.)

VIII. GENERAL APPLICATION REQUIREMENTS:

Submit itemized information and/or analysis that will demonstrate that all general application requirements as specified in Rule 116.111 of TNRCC Regulation VI are met. Each requirement in Rule 116.111 must be addressed in this application. See Instructions for further details. Atmospheric dispersion modeling may be required as part of the air quality impact analysis per Rule 116.111(9).

Is this facility a MAJOR SOURCE/MODIFICATION with regard to one of the following:

- 1. §116.111(7) - Nonattainment ..... -YES -NO
- 2. §116.111(8) - Prevention of Significant Deterioration -YES -NO.

APPEAL PROCESS:

Commission Rule 116.114(a)(3) should be consulted for the procedure to be used to appeal the failure of the agency to process an application within the prescribed time limits.

- X. A copy of this application and all attachments must be sent by the applicant to the EPA Region 6 office in Dallas if PSD or Nonattainment Review is applicable in any form, the appropriate TNRCC Regional Office and to any local air pollution control program having jurisdiction. Copies of the application were sent to:

EPA Region 6 Office in Dallas ..... : -YES -Not applicable.

TNRCC Regional Office (city) sent to: San Antonio, TX

Copies sent to these local programs: 1. \_\_\_\_\_

-NOT APPLICABLE. 2. \_\_\_\_\_

- XI. §116.110(d). PE Seal. Is the estimated capital cost of the project for which application is made greater than \$2 million dollars? -YES -NO

If YES, application must be submitted under seal of a Texas registered Professional Engineer, unless exemption is claimed pursuant to the Texas Engineering Practice Act.

- Exemption is claimed pursuant to Section \_\_\_\_\_ of the TEPA.

XII. I, LTC Dean C. Schmelling, Post Commander

(Name - Please print or type)

(Title: Owner, Plant Manager, President, Vice-President, Environmental Director, etc.)

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Health & Safety Code (THSC), Chapter 382, Texas Clean Air Act, as amended, or any of the air quality Rules and Regulations of the Texas Natural Resource Conservation Commission or any local governmental ordinance or resolution enacted pursuant to the Texas Clean Air Act. I further state that I have read and understand Section 382.091, THSC, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and Section 382.092, THSC pertaining to CRIMINAL PENALTIES.

DATE 5/31/95 SIGNATURE \_\_\_\_\_

NOTE - ORIGINAL SIGNATURE IN INK IS REQUIRED.

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