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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

June 23, 1995

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

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

Dear Colonel Schmelling:

This will acknowledge receipt of your application for the above-referenced permit. We have determined that deficiencies exist within your application and additional information is needed to enable us to continue with our review. Please furnish the information indicated below.

1. The freeboard ratios of the cold solvent cleaning vats. This ratio is the freeboard height divided by the degreaser width. Best available control technology requires that this ratio be at least 0.7.
2. Further information on the ventilation.
 - A. Please describe the area surrounding the emission points. In particular, describe or draw the location of any windows, doors, or other air inlets to the process area. This information is needed to determine whether the tanks will have any fugitive emissions associated with them.

We consider an area to be totally enclosed with no fugitive emissions if the velocity across the air inlet is at least 100 feet per minute. This velocity can be determined by dividing the total ventilation capacity of the fans (in cubic feet per minute) by the total cross sectional area (in square feet) of all air inlets to the process area.

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- B. Please describe the emission point for the solvent recovery unit. Are these emissions vented to the same process area where the other vats are located? Also, how did you determine the area given on Table 1(a) as the emission point for this unit?
3. Your application refers to fixed roof storage tanks. Please describe these tanks and any emissions associated with them.
4. Material safety data sheets for all materials used in the cleaning units. Technical data sheets are also an acceptable method of documenting the materials you propose to use.

After receipt of all the additional information, we will continue the review of your application. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible. You are reminded that Texas Natural Resource Conservation Commission (TNRCC) Rule 116.116(a) of Regulation VI states that all representations made in a permit application become conditions upon which a permit is issued. Any variations from these representations require prior authorization from the TNRCC.

Failure to submit all the requested information within 30 days of the date of this letter may result in the administrative voidance of your application. Following an administrative voidance, your application and supporting data, as well as any fees submitted, will be retained for 180 days. To reactivate the voided application, a new PI-1 application form and all the information requested above will be required. Additional fees need not be submitted if the project scope has not increased and the original fee was correct. If all these conditions are not satisfied within 180 days from the date of the voidance, your application will automatically be denied and the entire application, including the appropriate fee, must be resubmitted if you desire to pursue the project.

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact me at (512) 239-6142.

Sincerely,



Karen M. Bullard
Coatings Section
New Source Review Division
Texas Natural Resource Conservation Commission

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