

FILE

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 21, 1995

Lt. 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
Boerne, Bexar County
Account ID No. BG-0841-S

Dear Lt. Schmelling:

This will acknowledge receipt of your response to our request for additional information dated June 23, 1995. We have determined that your response was incomplete and supplemental information is needed to enable us to continue with our review. Please furnish the information indicated:

1. A proposal to modify your cold solvent cleaners to meet the 0.7 freeboard ratio requirement for Best Available Control Technology (BACT). Your consultant, Ms. Glynis Fowler, requested that we consider BACT for these units to only include the current configuration of the units (which does not meet the required freeboard ratio) and your work practices to limit emissions. However, the 0.7 freeboard ratio requirement was taken from Texas Natural Resource Conservation Commission (TNRCC) Regulation V requirements for degreasers. Regulation V requirements are considered to be Reasonably Available Control Technologies (RACT.) These RACT requirements are considered less stringent than BACT and, therefore, cannot be relaxed for your facility.
2. Further information on the ventilation. In my June 23, 1995 request I asked that you describe the process area surrounding the cold solvent cleaning vats. Your response did not contain sufficient information to determine whether these emissions should be considered fugitive. Please describe the ventilation provided for the vats including the air inlet area (in square feet) to the process area, the total air flow capacity of the ventilation fans (in cubic feet per minute), and any other relevant data.

August 21, 1995

3. In your July 20, 1995 letter you refer to the steam distillation unit as a "sulfur recovery unit" under Section 2.B. This appears to be a typographical error. Please verify this.
4. Calculations and emission rates for the storage tanks. Please show all fugitive (from valves, flanges, etc.) and vent emissions.
5. An updated Table 1(a) including all emission points, emission rates, and other information requested on this form. Item (3) requesting stream concentration in percent by volume is not required.

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 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

Karen M. Bullard
Coatings and Combustion Section
New Source Review Division (MC-162)
Texas Natural Resource Conservation Commission

KB/lp

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

Request for Comments to Toxicology & Risk Assessment Section

Date Submitted: August 18, 1995 RUSH
 Permit No.: 29466 TARA Control No.: 4197 MAR
 Company Name: DEPARTMENT OF THE ARMY-CAMP STANLEY
 Street, City, County: _____ Facility Type: CAMP STANLEY STORAGE FACILITY
 Permit Engineer: Karen M. Bullard

Circle One: New Source Amendment, or Renewal Circle One: Screening Model Refined Model

IMPACTS SUMMARY*

Chemical	CAS No.	One Hour					Annual			Plantwide Modeling (Y/N)
		GLC _{max} ⁽¹⁾	λ _{max} ⁽²⁾	ESL ⁽³⁾	GLC _r ⁽⁴⁾	λ _r ⁽⁵⁾	GLC _{max} ⁽¹⁾	ESL ⁽³⁾	GLC _r ⁽⁴⁾	
isopropyl alcohol	67-63-0	174		7856 ✓						yes
mineral spirits	8032-32-4	980		3500 ✓						yes
stoddard solvent	8052-41-3	84		3500 ✓						yes

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

Controls (specify): none

General Comments: degreasing units

Please Answer the following questions only if the GLC_{max} 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: _____ Date Completed: _____

- ⁽¹⁾GLC_{max} = Maximum Off-Property Ground Level Concentration (μg/m³).
- ⁽²⁾λ_{max} = Number of times GLC_{max} exceeds the ESL (hours/year) at receptor where GLC_{max} occurs.
- ⁽³⁾ESL = Effects Screening Level (μg/m³)
- ⁽⁴⁾GLC_r = Ground Level Concentration at Maximally Affected Sensitive Receptor (μg/m³). Supply this information only if the GLC_{max} is greater than the ESL.
- ⁽⁵⁾λ_r = Number of times ESL is exceeded (hours/year) at receptor where GLC_r 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.

Based on the emissions described above, our review indicates that operation of this facility will not be detrimental to public health.

M. Royce 8-23-95 JSI
 Date Toxicology & Risk Assessment Section

TARA Approval Stamp: