11/16/95

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 TNRCC

VOICE: 512 239-6142

FAX: 512 239-1330

FROM: Brian K. Murphy

VOICE: (210) 698-5208

FAX: (210) 221-7463

RE: Response to 25 October 1995 Memorandum

Number of pages including cover sheet: 2

Comments:

Per our discussion 15 Nov 95, please see attached.

Subject: TNRCC Staff Audit
Department of Army - Camp Stanley

Comments:

1. The Applicant only evaluated one emission point for Isopropyl Alcohol (EPN1 at 0.052 g/s), four emission points for Mineral Spirits (EPN1 at 0.0355 g/s, EPN2 at 0.0426 g/s, EPN3 at 0.0355 g/s and EPN5 at 0.013 g/s) and one emission point for Stoddard Solvent (EPN4 at 0.0341g/s);

2. Some of the Applicant's receptors are about 100 meters from the property line (Figure A.1). In addition, the electronic boundary line file defines a west property line that is about 75 meters from the location specified for EPN2 (emission point that is sole contributor to the maximum worst case impact predicted in test runs for one pollutant evaluated). The Applicant's Attachment VI.B-2 Detailed Plot Plan specifies a location for EPN2 that is about 25 meters from the property line (the 25 meter distance is also more consistent with the distance taken from the U.S.G.S. 7.5' topographic map). In addition, the southern boundary of the Applicant's electronic boundary line file is about 200 meters to the north of the boundary specified on the Applicant's plot plan. The Applicant should correct this information if additional evaluation is needed. Test runs were conducted to evaluate the significance of these and other deficiencies as discussed in the following comments:

3. There was a note regarding EPN5 on my copy as follows:

   ? Should this be modeled as a pt. source? The emissions are leaving through doors etc.

   EPN5 is described as a 10' long by 5' wide fugitive emission point in the Table 1(a) dated April 10, 1995. The Applicant divided the emission rate by the area (4.65 m^2) to calculate the area source emission rate. The Applicant's output file specified a width of area = 4.65 meters which should have been 2.155 meters. Test runs were conducted (with the corrected area source width and other corrections) for comparison with results using the traditional pseudo point source. EPN5 did not contribute to the maximum off-property concentration in either case.

4. The portion of the Applicant's submittal I reviewed did not include a physical description of EPN1, EPN2, or EPN3 defining the releases as vertical, without flow restrictions (rain caps, covers, etc.). The physical descriptions provided in the April 10, 1995 Table 1(a) were as follows:

EPN1 & 2	L=0.83', W=0.83'
EPN3	L=1.83', W=2.08'

The Applicant calculated an effective diameter based on these areas. These physical descriptions could be for a horizontal release. Therefore, these emission points were evaluated as pseudo point sources with fugitive parameters as a worst case. Maximum concentrations predicted for some of the pollutants evaluated were near the ESLs with this worst case assumption. However, when building wake effects were considered the predicted impacts dropped to well below the ESLs. The Applicant should provide complete physical descriptions of these emission points if additional evaluation is needed;

5. The building coordinates included in the Applicant's electronic BPIP input files were not entered in order. Also, there was an error in the coordinates for building 98. However, the emission points evaluated were not in the building 98 area of influence. The corrected coordinates were entered in order, and BPIP was run to calculate building dimensions used in staff test runs. The Applicant should correct the errors in the BPIP input files if additional evaluation of this facility is needed;

6. The Applicant used an anemometer height of 10 meters. Our records specify a seven-meter height for the San Antonio station. If additional evaluation of this facility is needed, then the Applicant should use the actual station anemometer height rather than the default 10 meter height. Test runs conducted in my *review used a seven-meter height*;

7. The Area map included in my copy of the submittal did not specify the location of the nearest residence. The electronic ISCST2 input files included coordinates for a residence about 1200 meters to the south of the property line. Review of the area map indicates there may be a residence nearer the Applicant's west property line. The location of the nearest residence and other sensitive receptors (if any, along the west property line near the emission points evaluated) should be specified if additional evaluation of this facility is needed; and

8. More detailed worst case evaluation of the facility may result in one or more exceedances of the ESLs near the west property line with magnitudes less than twice the ESL. However, I understand this would be acceptable to our effects evaluation staff. Therefore, more detailed dispersion modeling evaluation of this facility is not recommended.

The Applicant's Figure A-1, Locations of Receptors and Concentration Maxima, does not demonstrate the maximum off-property concentrations have been located, does not specify UTM coordinates, and does not provide other suggested information.

If additional evaluation is needed, then the Applicant should provide the following:

a. Concentration array maps for each pollutant. These maps should specify locations of receptors and predicted concentrations along the west property line in the area of the emission points evaluated. Receptors should cover a sufficient distance along the property line to demonstrate the maximum off-property concentration has been located;

b. These maps should specify concentrations for three or more rows of receptors west of the property line. These receptors should also demonstrate the maximum off-property concentration has been located; and

c. Maps specifying the number of times the ESLs are exceeded, if any.

KMB

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

October 25, 1995

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

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

Dear Colonel Schmelling:

This letter is in response to discussions with Mr. Brian Murphy and your consultant, Ms. Glynis Fowler, indicating that you would like to change some of the representations in your permit application before the permit is issued. I understand that you would like to increase the usage rates of solvents in your cold solvent cleaners and that you would like chemical flexibility in your permit conditions.

Please provide information on the new usage rates and any new materials. I have enclosed a copy of a memo from our Permit Modeling Unit discussing the results of the audit of the modeling submitted with the original permit application. Although the modeling was accepted for the original emissions, the memo discusses areas where corrections are required if further analysis is required.

If you propose to change the character or increase the amount of emissions from any Emission Point No. (EPN), further modeling with the indicated corrections is required. Further modeling is also required to add chemical flexibility to your permit conditions. The chemical flexibility statement uses a generic concentration based on a one pound per hour emission rate from each EPN to allow you to determine if a particular chemical may be substituted for one represented in your permit application.

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 30 TAC Section 116.116(a) (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 Texas Natural Resource Conservation Commission.

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

Enclosures

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