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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

February 4, 1999

Protecting Texas by Reducing and Preventing Pollution

Mr. Brian Murphy
Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, Texas 78015

Re: Solid Waste Registration (SWR) Number 69026
Camp Stanley Storage Activity, U.S. Army

Dear Mr. Murphy:

Ms. Teresa J. Anderson of the Parsons Engineering Science, Inc. has requested that we clarify the reporting requirements for a nonindustrial facility's hazardous waste generation and tracking requirements of Class 1, 2, or 3 wastes. As a nonindustrial facility, and in accordance with 30 TAC 335.6, Camp Stanley Storage Activity (CSSA) will not be required to track or report Class 1, 2, or 3 waste activity as long as CSSA remains classified as a nonindustrial facility. In accordance with 30 TAC 335.6(b)(c) you will, however, still need to report any hazardous waste generation activity, unless you are a Conditionally Exempt Small Quantity Generator (CESQG). According to 30 TAC 335.78, a generator is a CESQG if he generates no more than 220 pounds of hazardous waste in a calendar month. In accordance with 30 TAC 335.504 (relating to Hazardous Waste Determination), a person who generates a solid waste must determine if the waste is hazardous.

I hope this letter will serve your purpose in documenting your records. If you have any questions regarding your Notice of Registration, please do not hesitate to contact the Data Analysis and Management Team at (512) 239-6413. If you have any questions regarding waste classification or hazardous waste recycling, please contact a member of the Technical Analysis Team at (512) 239-6412.

Sincerely,

A handwritten signature in cursive script that reads "Ellette Vinyard".

Ellette Vinyard, *Leader*

Data Analysis and Management Team
Waste Evaluation Section
Registration & Evaluation Division

EV/SLW/mb

cc: Ms. Teresa J. Anderson, Task Manager, Parsons Engineering Science, Inc., 8000 Centre Park Drive, Suite 200, Austin, TX 78754-5140