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DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, RRAD
26800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

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24 October 1997

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INDUSTRIAL & HAZARDOUS WASTE
CORRECTIVE ACTION SECTION

Office of the Commander

Chief, Texas Section (6EN-HT)
RCRA Enforcement Branch
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

SUBJECT: EPA Region 6 Consent Agreement and Consent Order
(CACO), Docket No. RCRA VI-310-H, Effective Date -
24 May 1996

Dear Mr. Coleman,

In accordance with the provisions of Section 37 C of the CACO, Camp Stanley Storage Activity (CSSA) herewith submits its Completion Report for Supplemental Environmental Project (SEP) Number CSSA-02, Environmental Specialist, as contained in Appendix B of the referenced CACO. These provisions call for the submittal of a Completion Report within 45 days after the completion of the efforts required under the SEP.

The undersigned certifies, based on information and belief formed after reasonable inquiry, that the information contained in or accompanying this submission is true, accurate, and complete. As to those identified portions of this submission for which I cannot personally verify the truth and accuracy, I certify the Activity official having supervisory responsibility for the person(s) who, acting upon my direct instructions, made the verification, that this information is true, accurate, and complete.

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Should you have any questions or comments about the
aforementioned tasks being performed, please contact Mr.
Brian Murphy on (210) 698-5208.


ERNEST N. ROBERSON
LTC, U.S. Army
Commanding Officer

cc: Mr. Richard Clarke
Chief, Industrial and Hazardous Waste Section, TNRCC

Mr. Malcolm Ferris
TNRCC, Region 13

LTC Dave Bell
U.S. Army, Office of the JAG, Environmental Law Division

COMPLETION REPORT
SUPPLEMENTAL ENVIRONMENTAL PROJECT NUMBER CSSA-02
ENVIRONMENTAL SPECIALIST
CONSENT AGREEMENT AND CONSENT ORDER
DOCKET NUMBER RCRA VI-310-H

I. Project Description: Under this SEP, as the full extent of the environmental status of CSSA became known, the Department of the Army recognized the importance of compliance by creating a new position and assigning a full-time Environmental Specialist to implement those actions required to bring Camp Stanley Storage Activity (CSSA) into compliance with applicable EPA and TNRCC regulations.

The establishment of an Environmental Specialist position was a critical element in expediting the CSSA environmental management program at CSSA. Since the arrival of the Specialist, CSSA has made rapid and significant progress in the following areas:

- Clean Air Act
- Clean Water Act
- Federal Insecticide and Rodenticide Act
- Hazardous Materials
- Liaison between federal, state, and other organizations/activities
- Natural and Cultural Resources
- Noise
- Pollution Prevention
- Recycling
- Resource Conservation and Recovery Act
- Solid Waste Management Unit Closure Activities

Each of the aforementioned subject areas will be discussed in greater detail in Section V of this document. If additional information is desired, the reader may wish to review the quarterly reports submitted since the inception of this SEP.

II. Operational Problems Encountered: Since the creation of the position any operational problems encountered have been minimal. One problem encountered is that budgets and manpower are decreasing at significant rates across the DOD. CSSA has maintained a sufficient budgetary level over the last three years, the timeframe of this SEP. However, there are no guarantees of the same funding levels over the next couple of fiscal years. This may mean that only a limited

COMPLETION REPORT
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amount of new site investigations, cleanup, and closure activities can be performed in the near future. Nevertheless, CSSA will continue to make progress in its environmental restoration program.

III. Cost Information: A description of costs associated with this SEP are provided below as well as major and/or significant activities performed over the last three years due to the presence of the Environmental Specialist.

As agreed to in the CACO signed by both parties, Appendix B refers to the Environmental Specialist's salary, benefits, and relocation expenses over the timeframe. These expenses were incurred by CSSA. However, relocation expenses are much higher than originally anticipated.

IV. Certification: By submittal of this completion report, CSSA certifies that all provisions of this SEP have been fulfilled and that all documentation provided is current and has not been revised in any way to reduce the costs allocated to this SEP.

V. SEP Benefits: By performance of this SEP and the assignment of an environmental specialist at CSSA, much progress in environmental restoration and related areas has been made than would have otherwise occurred. Given issues of personnel downsizing, hiring freezes, budget reductions, base closures, and significant environmental concerns throughout the DOD and Army, it is extremely doubtful that the current program successes could have been achieved by intermittent TDY support from CSSA's higher headquarters, RRAD, or even local support from Fort Sam Houston, and Brooks Air Force Base environmental groups, even if such support could have been arranged.

The direct benefits from this SEP are outlined in the following highlights of significant activities which have been performed since the environmental specialist arrived at CSSA in August 1994. Some other programs and/or projects may have been conducted without an environmental specialist dedicated 100% of the time, however, there would not have been so many complex tasks accomplished within such a short period of time.

**COMPLETION REPORT
SUPPLEMENTAL ENVIRONMENTAL PROJECT NUMBER CSSA-02
ENVIRONMENTAL SPECIALIST
CONSENT AGREEMENT AND CONSENT ORDER
DOCKET NUMBER RCRA VI-310-H**

• **Clean Air Act**

An air quality permit, TNRCC number 29466, was obtained in December 1995. There was no previous permit. Prior to obtaining the permit the Environmental Specialist met with TNRCC representatives in Austin to determine what would be needed in the permit process. Significant alterations to two paint booths exhaust systems at CSSA were required before obtaining the permit. The Environmental Specialist ensured that meeting the requirements of the new permit could be accomplished through coordination with affected activities on Base and oversaw the necessary facility modifications.

• **Clean Water Act**

A NPDES permit was obtained from the TNRCC, number 03849, in June 1996. Our permit was changed from a municipal to industrial type. This is due in part to a vehicle washing facility on Base and an additional outfall for possible treatment of groundwater and irrigation of the effluents.

Other activities involving our sewage treatment plant since August 1994 include: removal of sludge material from our drying bed; construction of a building to store our chlorine cylinders and injection system; raising the sidewall heights of our contact and effluent areas to prevent rain waters from entering our system; and constructing a concrete ramp to safely maneuver chlorine cylinders in and out of the storage building.

Although a stormwater permit is not required on Base, CSSA has taken strides towards reducing soil erosion. CSSA has initiated a ashe juniper (cedars) removal program which promotes greater aquifer recharge. Although exempted from permitting, due to agricultural activities, CSSA has adopted best management practices while removing the cedars. For instance, where slopes are present minimum vegetation will be removed. Also, replanting of native grasses has been accomplished in many areas.

COMPLETION REPORT
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DOCKET NUMBER RCRA VI-310-H

- **Federal Insecticide and Rodenticide Act**

CSSA, at the direction of the Environmental Specialist has adopted integrated pest management (IPM) procedures for pesticide and herbicide activities. CSSA has coordinated its program with Red River Army Depot and reports monthly to them for chemical usage. Both pesticide applicators have been retrained at Fort Sam Houston as required.

The Environmental Specialist initiated the purchase and installation of a prefabricated herbicide/pesticide storage building in 1996 to safely store these hazardous materials used on Base.

- **Hazardous Materials**

The Environmental Specialist initiated the establishment of a hazardous materials pharmacy on Base. The "pharmacy" began operation in October 1995. Since its creation the Environmental Specialist identified software to be utilized by the facility to track, use, store, and measure waste activities. The Army Environmental Center was contacted for the software. They eventually installed a local area network on Base for key individuals to utilize the Hazardous Substance Management System (HSMS). HSMS is the recognized program to be used by all of the U.S. Army and other services. **CSSA was the first Army facility in the world to be fully operational under HSMS.**

The Environmental Specialist arranged training for our pharmacy personnel at Fort Sill, Oklahoma, the Army's lead environmental training facility.

- **Liaison between federal, state, and other organizations/activities**

Working relationships have been established between the environmental specialist and EPA Region 6, and TNRC state and regional representatives.

**COMPLETION REPORT
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DOCKET NUMBER RCRA VI-310-H**

The United States Department of Agriculture, Agricultural Research Station (USDA/ARS) has been utilizing the facility since the early 1960's for livestock grazing and research activities. The Environmental Specialist has helped solidify the relationship between USDA and CSSA that will ensure cooperation into the future.

The Environmental Specialist used his initiative to begin discussions with USDA, Natural Resource Conservation Service to gain knowledge in managing the facility from a biodiverse perspective. Meetings are set up regularly to discuss various land management activities.

The Environmental Specialist has initiated contacts with other federal organizations that have assisted CSSA in advancing its environmental program. These organizations are: Army Environmental Center; Air Force Center for Environmental Excellence; Occupational and Environmental Health Laboratories, Armstrong Laboratories; U. S. Army Corps of Engineers, Fort Worth Office; Center for Health Promotion and Preventative Medicine; Defense Reutilization Marketing Office Kelly Air Force Base; and, Red River Army Depot.

• **Natural and Cultural Resources**

CSSA has initiated the creation of an integrated cultural and natural resources management plan for the facility. The Environmental Specialist initiated the development of this plan through the Corps of Engineers, Fort Worth District in FY 96. There have been cultural/archeological sites identified on the Base and initial recovery studies have been performed.

Our buildings are currently under review by the State Historic Preservation Office for possible listing as historic places.

• **Noise**

CSSA, through the Corps of Engineers, Fort Worth District, performed an Installation Compatibility Use

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CONSENT AGREEMENT AND CONSENT ORDER
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Zone (ICUZ) study. This project was initiated by the Environmental Specialist to determine noise impacts on neighboring landowners from mission related activities.

• **Pollution Prevention**

With the creation of the hazardous materials pharmacy the toxicity of material being utilized has decreased. Also, the amounts of materials being stored has significantly decreased. CSSA reduced hazardous waste disposals in calendar year (CY) 94 - 14,640 to 12,955 in 95, a 11.5% reduction. Our EPCRA 313 extremely hazardous substances from CY 94 to 95 decreased approximately 50%. Our pollution prevention activities have been very proactive. CSSA identified 313 chemicals and targeted them for eventual removal from purchases and storage.

A recommendation from the waste minimization study conducted in June 1995 to replace of the perchloro-ethylene and tetrachloroethylene processes was implemented as soon as was possible,. CSSA purchased a citrus-based cleaner system to replace the chlorinated solvent. Any residues generated from the process have been TNRCC Class I non-hazardous wastes.

The Environmental Specialist prepared the facility's pollution prevention plan. We have exceeded goals established under the Presidential Executive Order.

• **Recycling**

Under the direction of the Environmental Specialist a recycling program for paper products, metals, batteries, oil, antifreeze, freons, tires, glass, plastics and other materials was instituted and is successfully operational.

• **Resource Conservation and Recovery Act**

The CSSA Environmental Specialist assisted in preparation of scoping documentation for a contract to

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have a Hazardous Waste Management Plan prepared. The Plan was completed and implemented during FY 97.

A waste minimization plan was prepared in June 1995 for implementation.

A source reduction and waste minimization plan was provided to the TNRCC, Office of Pollution Prevention and Recycling in April 1996.

The Environmental Specialist initiated the purchase in installation of a prefabricated hazardous materials storage building in 1996 to safely store hazardous wastes awaiting disposal, a less than 90-day storage facility.

The CSSA Environmental Specialist arrived after most of the underground storage tanks had been removed. However, the removal of remaining tanks required coordination with occupants, planning to prevent damage to infrastructure during colder periods, and installation of aboveground tanks (ASTs) simultaneously. All closure documentation for each tank was reviewed and provided by CSSA.

Each of the ASTs were installed under the direct supervision of the Environmental Specialist. There were three fuel oil, one diesel, and one gasoline tanks installed. The diesel and gasoline tank have automatic tank gauging. The gasoline tank has a vapor recovery system also. Each of these extra amenities were provided at the request of the Environmental Specialist. Tanks were registered as required.

CSSA underwent a compliance evaluation inspection in August 1997. There were only minor areas of concern and a violation alleged and resolved noted during the inspection.

• **Solid Waste Management Unit Closure Activities**

The CSSA Environmental Officer has initiated investigations at 33 solid waste management units (SWMUs) since his arrival. Each of the SWMUs is in various stages of study or investigation. Five SWMUs that are worth noting where soils have been sifted to remove any possible unexploded ordnance materials and

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SUPPLEMENTAL ENVIRONMENTAL PROJECT NUMBER CSSA-02
ENVIRONMENTAL SPECIALIST
CONSENT AGREEMENT AND CONSENT ORDER
DOCKET NUMBER RCRA VI-310-H

miscellaneous metal debris. At two other SWMUs, pilot studies of electrokinetic and soil vapor extraction technologies are underway. These SWMUs are the likely sources for the groundwater contamination. TNRCC and EPA concurred with CSSA that these sites required immediate attention.

CSSA has also continued its groundwater monitoring efforts. The installation of two additional deep monitoring wells, a weather station, dedicated slow flow pumps activities have been completed, and seismic refraction studies have been conducted.

Due to the large amount of data being gathered from site investigation and groundwater activities CSSA has established a geographical information system (GIS). It will be used for site specific air, water, soil, and other miscellaneous time and location-based data and will provide an excellent database for analysis work and remediation planning activities.