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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 3, 1998

Lt. Col. Ernest N. Roberson, Commander
Department of the Army
Camp Stanley Storage Activity, RRAD
25800 Ralph Fair Road
Boerne, TX 78015-4800

Re: Camp Stanley Storage Activity Wastewater Treatment Facility, Texas Natural Resource Conservation Commission (TNRCC) Permit No. WQ0003849, Environmental Protection Agency (EPA) Permit No. TX0064505

Dear Lt. Col. Roberson:

On January 14, 1998, a representative of our office conducted an inspection of the above-referenced facility to evaluate compliance with applicable wastewater treatment requirements. During the inspection, no outstanding alleged violations were identified. A copy of the inspection report is enclosed. We appreciate your efforts to comply voluntarily with the state's environmental laws and regulations.

Should clarification of this letter be desired or if we may be of any other assistance, please contact Thomas Haberle of our San Antonio office at 210/490-3096.

Sincerely,

A handwritten signature in cursive script that reads "Bobby D. Caldwell".

Bobby D. Caldwell
Water Section Manager
San Antonio Regional Office

BDC/TGH/ eg

Enclosure: Inspection Report

cc: TNRCC Field Operations, Austin

REPLY TO: REGION 13 • 140 HEIMER RD., SUITE 360 • SAN ANTONIO, TEXAS 78232-5042 • AREA CODE 210/490-3096

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION DOMESTIC OR INDUSTRIAL WWTP COMPLIANCE REVIEW INSPECTION REPORT		<input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> CODE SHEET
PERMITTEE: United States Department of the Army ADDRESS: 25800 Ralph Fair Road Boerne, Texas 78015-4800 FACILITY NAME: Camp Stanley Storage Activity Wastewater Treatment Facility		WQ 0003489-000 3849-000 TX 0064505-000 <input type="checkbox"/> N/A
TYPE WASTE <input type="checkbox"/> DOM - Domestic <input checked="" type="checkbox"/> IND - Industrial	CLASSIFICATION <input type="checkbox"/> Major <input type="checkbox"/> 92-500 Minor <input checked="" type="checkbox"/> Other Non-major	RETENTION CODE <input checked="" type="checkbox"/> D - Discharge to surface water <input type="checkbox"/> R - Retained (land disposal)
REGION: 13	COUNTY: 15	BASIN: 19
OPERATIONAL STATUS <input checked="" type="checkbox"/> A - Active <input type="checkbox"/> I - Inactive	TYPE INSPECTION <input checked="" type="checkbox"/> ACI - Annual Compliance Inspection	SELECTION CODE <input type="checkbox"/> GM-Grant Major <input type="checkbox"/> GB-Galv. Bay Grant Minor <input type="checkbox"/> MD-Mandatory Grant Minor <input checked="" type="checkbox"/> DS-Discretionary
DATE INSPECTED 01/14/98 DATE REPORT 02/03/98 DATE LETTER 02/03/98	FIELD MEASUREMENTS TAKEN <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	TYPE LAB SAMPLE <input type="checkbox"/> COM - Composite <input checked="" type="checkbox"/> GRB - Grab <input type="checkbox"/> NON - None
CHAIN OF CUSTODY TAG NUMBER(S) <input type="checkbox"/> N/A MU 03820		OUTSTANDING ALLEGED VIOLATIONS/DEFICIENCIES <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
FACILITY EVAL. CONCERNS [2 LETTER CODES ONLY] <input checked="" type="checkbox"/> N/A M = RE U =	ALLEGED EFFLUENT VIOLATIONS <input checked="" type="checkbox"/> N/A <input type="checkbox"/> BOD, <input type="checkbox"/> TOC <input type="checkbox"/> pH <input type="checkbox"/> CBOD, <input type="checkbox"/> COD <input type="checkbox"/> DO <input type="checkbox"/> TSS <input type="checkbox"/> Metals <input checked="" type="checkbox"/> Cl ₂ Res. <input type="checkbox"/> NH ₃ -N <input type="checkbox"/> Organics <input type="checkbox"/> Dechlor. Cl ₂ Res. <input type="checkbox"/> Other (Specify):	
RESPONSE DUE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DATE RESPONSE DUE 00/00/00 <input checked="" type="checkbox"/> N/A	
ENFORCEMENT INITIATION REQUEST WITH THIS REPORT <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DATE ENFORCEMENT INITIATION REQUEST 00/00/00 <input checked="" type="checkbox"/> N/A	
INSPECTOR: Thomas G. Haberle		INITIALS: TGH
COMMENTS RELATED TO CODE SHEET DATA:		
ROUTE TO: <input type="checkbox"/> Permit Applications <input type="checkbox"/> Municipal Permits <input type="checkbox"/> Industrial Permits <input type="checkbox"/> Sludge/Transporter <input type="checkbox"/> Toxicity Evaluation <input type="checkbox"/> Pretreatment <input type="checkbox"/> Enforcement <input type="checkbox"/> Operator Certification <input type="checkbox"/> Self-reporting <input checked="" type="checkbox"/> Record Services <input type="checkbox"/> Other:		

RECEIVED

FIELD OPERATIONS

A. CONTACT NAME/TITLE:

Mr. Brian Murphy - Environmental Officer
Mr. Kenneth Wallace, Jr. - "C" Operator

PHONE

210-295-7453
210-221-7453

YES NO

Yes
Yes

B. TREATMENT SYSTEM: List units and/or attach schematic. If land disposal, include description of disposal method.

The treatment facilities consists of a bar screen, influent flow meter, Imhoff Tank, trickling filter, chlorine contact tank, detention chamber, one sludge drying bed, 22 1/2° V-Notch weir and automatic flow meter.

If the permit has interim and final limits, indicate phase in effect.

() Applicable (X) N/A

The Camp Stanley Storage Activity permit was issued on June 7, 1996. This permit authorizes the discharge of treated domestic wastewater/car wash water from Outfall 001 and treated groundwater from outfall 002. There are no interim effluent limitations associated with either of these two outfalls.

Describe any plant modifications since the last annual inspection.

() Applicable (X) N/A

There have been no major modifications made to the wastewater treatment facilities since the last annual compliance inspection of 03/20/96.

C. INSPECTION SAMPLE RESULTS: () N/A - No samples/measurements taken

Outfall & Parameter	Measured Value	Permit Limit	Type Sample	COC Tag No.	Primary Source of Wastewater
001			grab	MU 03820	Domestic/car wash
Flow MGD	0.005472 MGD	0.030 MGD Dly. Avg.	"	"	
BOD ₅ mg/l	<3.0 mg/l	65 mg/l	"	"	
TSS mg/l	2.0 mg/l	65 mg/l	"	"	
D.O. mg/l	9.83 mg/l	2.0 mg/l	"	"	
cl ₂ residual mg/l	1.5 mg/l	1.0 mg/l minimum 4.0 mg/l maximum	"	"	
pH s.u.	8.46 s.u.	6.0 s.u. minimum 9.0 s.u. maximum	"	"	
Water Temperature °C	12.2°C	NA	"	"	
Conductivity umhos/cm	490 umhos/cm	NA	"	"	
VSS mg/l	1.0 mg/l	NA	"	"	
Total Copper mg/l	not sampled-not used on base	0.23 mg/l	"		

D. RECEIVING WATER AT TIME OF INSPECTION:

Is effluent discharged to a classified segment or within 300 feet of a classified segment? () Yes (X) No () N/A - Land disposal If no, complete the following chart (check all appropriate categories):

Name of receiving water: <u>Unnamed tributary of Leon Creek</u>					
() Lake		() Tidal stream		() Wetland, marsh	
() Bay		() Playa		() Other (specify):	
(X) Ditch Up Down			() Stream, Up Down		
() () Man-made			() () Channelized		
() (X) Normally flowing (due to discharge of effluent)			() () Normally flowing		
(X) () Dry channel			() () Dry channel		
() () Isolated pools			() () Isolated pools		
() () Natural swale					

E. FACILITY EVALUATION: S = Satisfactory N/E = Not Evaluated
M = Marginal N/A = Not Applicable
U = Unsatisfactory

Provide comments in Sections E or G for all M and U ratings.

Eval	Code	Category	Eval	Code	Category
NA	75	1. Compliance with 75/90 rule	S	SP	9. Self-monitoring procedures
S	II	2. Infiltration/Inflow	S	LP	10. Laboratory procedures () Commercial (X) In-house
S	FL	3. Compliance with flow limits	S	SE	11. Self-monitored effluent quality
S	UD	4. Unauthorized discharges	S	RE	12. Region-documented effluent quality
S	CO	5. Certified operator	S	RS	13. Receiving stream
S	IW	6. Industrial waste contribution for domestic WWTP	S	SD	14. Sludge disposal
S	OM	7. Operations and maintenance	NA	IP	15. Irrigation practices
S	FA	8. Flow measurement accuracy Type: <u>22 1/2° V-Notch weir with Flow meter/totalizer</u> Field check attached: (X) Yes () No If no, provide explanation.	NA	CS	16. Compliance schedule
			NA	OT	17. Other: _____

F. OUTSTANDING ALLEGED VIOLATIONS: () Applicable (X) N/A

No	Requirement(s) Cited	Description of Alleged Violation and Corrective Action Recommendation	Compliance Due Date

G. OTHER ALLEGED NONCOMPLIANCES NOTED AND RESOLVED: () Applicable (X) N/A

The following alleged noncompliances were discussed with Name and Position on Date. These alleged noncompliances were either corrected on-site at the time of the inspection or appropriate documentation of corrective action was provided to the Regional Office within an acceptable time frame.

No	Requirement(s) Cited	Description of Alleged Noncompliance and Corrective Action Taken

H. BIOMONITORING: () Applicable (X) N/A

Were any problems noted with the following items? If yes, provide comments.

- () Yes () No Sample holding time
- () Yes () No Sample collection
- () Yes () No Sample type
- () Yes () No Unauthorized sample dechlorination

I. OTHER COMMENTS: (X) Applicable () N/A

The wastewater treatment facility receives domestic wastewater from approximately 100 people working on the site. The plant also receives a small volume of wash water from the vehicle wash facility.

To increase the flows to the trickling filter unit, so the distribution arms will turn at a faster rate and keep the filter media wet, effluent is pumped from the holding basin prior to chlorination.

Sludge is wasted to the sludge drying bed on a routine basis. When enough sludge has accumulated in the bed, a transporter hauls the sludge to an authorized disposal site. Very little sludge is accumulated in the sludge drying bed. Sludge was last hauled from the plant on May 4, 1995, by Rolls Management, Incorporated. There has been no sludge removed from the plant site since the last inspection was conducted.

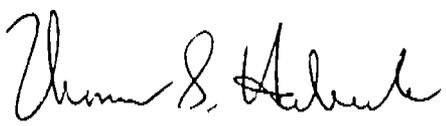
The effluent was clear with no foam or sludge deposits noted in the receiving stream.

The groundwater treatment system has not been constructed for the treatment of groundwater. The permit authorizes the discharge of treated groundwater from outfall 002 or the use of this treated groundwater by irrigation. There is no immediate plans for a groundwater treatment unit to be placed into operation. By letter dated September 24, 1997, (attached) from Herman E. Stinson, Acting Commander for the Camp Stanley Storage Activity, it was requested that the reporting requirements be waived for outfall 002 since groundwater treatment has not been initiated.

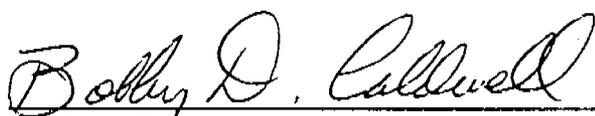
Self-reported data for the period January, 1996-December, 1997, showed that the only violations reported were for a flow daily average and flow daily maximum for the month of June, 1997. The notice of exceedance letter submitted by the permittee stated that the flows were exceeded due to heavy rainfall events which occurred during the period of June 20-22, 1997 (letter attached).

J. REGIONAL OFFICE ACTION TAKEN: () Applicable (X) N/A

K. CENTRAL OFFICE ACTION REQUESTED: () Applicable (X) N/A



Inspector



Regional Water Section Manager

Signature Date February 3, 1998

ACCURACY CHECK
FLOW INDICATING/RECORDING EQUIPMENT

001 Outfall

22 1/2 ° V-Notch Weir Type of measuring device

11:00 a.m. Time

2 1/4 Head (X) inches () feet

0.005472 MGD Recorded flow at time listed

0.00510 MGD Calculated flow

Reference for calculated flow: Isco Open Channel Flow Measurement Handbook, 3rd. Edition, 1992.

7.29 % Percent error

$$\text{Percent error} = \frac{(\text{recorded value} - \text{calculated value}) (100)}{\text{calculated value}}$$

$$\text{Percent Error} = \frac{(0.005472 - 0.00510) (100)}{0.00510}$$

$$\text{Percent Error} = 7.29\%$$

7/8/97 Date of last calibration

Comments: The automatic flow meter was last calibrated by the Menco Group.

