

PARSONS ENGINEERING SCIENCE, INC.

A UNIT OF PARSONS INFRASTRUCTURE & TECHNOLOGY GROUP INC.

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December 17, 1999

Ms. Laurie Lancaster
MC 148
Permits Administrative Review Team
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78701

Subject: Application for a Texas Pollution Discharge Elimination System Permit Amendment –
Camp Stanley Storage Activity Permit Number 03849, Additional Information

Dear Larurie:

Enclosed are an original and two unbound copies of additional information for the Camp Stanley Storage Activity TNRCC wastewater permit amendment application. Tables B-1, B-2, B-5, and B-7 have been completed for Outfall 001. Please note that Table B-1 includes only three samples for Total Organic Carbon (TOC) in the wastewater treatment plant influent and effluent. The fourth set of samples taken on September 15, 1999 indicated that the effluent TOC was higher than the influent (46 mg/L effluent versus 12 mg/L influent). These TOC results were judged to be invalid because they were not comparable to the BOD or COD results.

The laboratory QA/QC data has been reviewed in accordance with data validation guidelines found in the USEPA National Functional Guidelines, February 1994. A number of results have been flagged based on those guidelines. However, none of the flagged results were for parameters that would be expected in the effluent from this facility. Therefore, no additional analyses were done.

Camp Stanley is expecting to begin treatment of wastewater from groundwater monitoring activities in January or February of 2000. This wastewater is representative of the effluent expected to be discharged from Outfall 002. It will be sampled and analyzed for appropriate parameters at the time that the treatment process starts up.

I have enclosed a diskette containing an electronic copy of the landowners list in WordPerfect format and a copy of the application form errata page dated September 27, 1999 which were not included in the original submittal.

I have also enclosed original photographs showing the land application areas and the Outfall 001 discharge route. Note that the permit amendment request does not involve physical expansion of the existing wastewater treatment plant. Therefore, no photo of the treatment plant has been included.

With respect to the draft notice, we feel that would be helpful to clarify that this is a continuation of an already permitted discharge activity. I would suggest that the notice be revised starting at the fourth line to state that the application is... “to renew and amend the existing TNRCC wastewater permit. The application requests authorization for treatment and discharge of an additional waste stream via Outfall 001 while maintaining the current permit

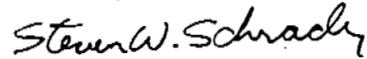
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limits on discharge quantity and quality. The application also requests an increase in the amount of land within CSSA boundaries used for irrigation of treated wastewater".

The NPDES permit number for Camp Stanley is TX0064505 as you indicated in your letter.

Please call at (512) 719-6048 with any questions you may have.

Sincerely,



Steven W. Schrader, P.E.
Environmental Engineer

enclosure

cc w/enclosure: Environmental Encyclopedia
Brian Murphy, CSP, Camp Stanley

cc w/o enclosure: Julie Burdey, Parsons ES
Chris Beale, WPI, Camp Stanley
Rene Hefner, AFCEE, Brooks AFB
Jo Jean Mullen, AFCEE, Brooks AFB