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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

June 21, 1995

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

Re: Administrative Review
Construction Permit
Permit No. 29466
Camp Stanley Storage Facility
Boerne, Bexar County

Dear Colonel Schmelling:

This is in response to your construction application received on June 9, 1995 and to acknowledge receipt of your permit fee in the amount of \$450.00.

We have completed our initial review and find that there is sufficient information to declare your application administratively complete.

Accordingly, your application has been referred to the New Source Review Coatings Section for technical evaluation and review under Texas Natural Resource Conservation Commission Regulation VI.

Unless otherwise notified, it will expedite the handling of your request if you will now direct all communications regarding this matter to Ms. Karen Bullard, who has been assigned as the project engineer. To further expedite review, you are welcome to fax the requested information to the above engineer at (512) 239-1330.

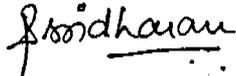
Please note that this letter does not represent a technical review of your application, but rather determines that sufficient information has been submitted to justify the start of the technical review. Please be aware that the technical review and evaluation may result in requests for additional information (see the enclosed **Technical Completeness Guidelines**). You will be contacted if additional information is required to complete the review. Please remember that all of the information which you submit, whether on paper or in electronic form, will become part of the

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public record unless it is clearly marked as confidential. If you submit any proprietary information, please make certain that it is marked confidential and is separated from the non-confidential information. If you have any further questions concerning this matter, please contact the designated project engineer directly at (512)239-6142.

Sincerely,



Sridharan Raj
CORE Section
New Source Review Division (MC-162)

Enclosures

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

TECHNICAL COMPLETENESS GUIDELINES

Submitting an administratively complete application is a necessary first step toward getting your permit or amendment approved. The application must also be technically complete and correct before it can be sent forward for approval. Because of the wide variety of permit types and the case-by-case nature of the permit review process, it is impossible to specify what is required for technical completeness for every application. However, an understanding of the technical review process will help you to determine what information will be needed for your application to be declared technically complete.

There are three major parts to the technical review process. The first part of the review verifies that all **emission sources** have been identified and the **emission rates** have been correctly calculated. The permit engineer uses some or all of the following information to complete this part of the review: process description, process flow chart, Table 1(a), material usage rates table, Material Safety Data Sheets (MSDS), and the emission calculations.

After the emission sources have been identified and evaluated, the permit engineer begins reviewing the proposed control technology. The TNRCC Rule 116.116(a) of Regulation VI requires the application of the **best available control technology (BACT)** for all permitted emission sources.

Once the TNRCC and the applicant agree on the appropriate controls for the facility, an off-property **impacts analysis** is performed for all emission sources. A computer-based mathematical model is used to predict the off-property impacts (concentrations) for each air contaminant. The permit engineer may require the applicant to perform dispersion modeling based on the proposed emissions from the facility. The TNRCC Modeling Section has established modeling protocol and **must** be consulted before any official modeling is performed. The predicted off-property concentrations of the proposed emissions may be submitted to the TNRCC Toxicology and Risk Assessment Section for a toxicological review.

For new permits and substantial modifications to existing permits, the permit engineer may require the applicant to have two **public notice** advertisements published in a newspaper with local circulation and post signs at the facility site for a 30-day public comment period. During the comment period, the public has the right to request an informal public meeting or contested case hearing concerning the application.

When all of the issues described above have been resolved, the permit engineer will draft the **permit special conditions** for review and comment by the applicant. The regional office of the TNRCC and local programs with jurisdiction over the facility also review, comment on, and sometimes suggest changes to these draft special conditions. Once all parties agree on the permit special conditions, the new or amended permit is issued.