DEPARTMENT OF THE ARMY
CAMP STANLEY STORAGE ACTIVITY, RRAD
25800 RALPH FAIR ROAD, BOERNE, TX 78015-4800

February 10, 2004

U-030-04

Mr. David L. Howell
Texas Commission on Environmental Quality
Permits Administrative Review Section
MC 161, 12100 Park 35 Circle
Building F, 1st Floor, Room 1206
Austin, Texas 78753

Subject: Permit By Rule Application for *SWMU B-3 Pilot Study*, Camp Stanley Storage Activity. Boerne, Texas

Dear Mr. Howell:

The Camp Stanley Storage Activity (CSSA), Red River Army Depot, Tank-Automotive and Armaments Command, Army Material Command, U.S. Army, is submitting this Permit By Rule application for the subject soil vapor extraction (SVE) system. The proposed SVE system will implement a pilot study using soil vapor extraction technology to test remediation of chlorinated volatile organic compounds (VOCs) around and underlying Solid Waste Management Unit (SWMU) B-3. An SVE system was previously operated at SWMU B-3 under Permit No. 32405, however, this system was abandoned during excavation activities at the site. The proposed pilot SVE system will test extraction of chlorinated VOCs from the contaminated groundwater bearing unit beneath the SWMU.

The following assumptions were made to prepare a worst-case emissions estimate:

- The blower will draw soil gas at a rate of approximately 200 acfm and 80 in. WC vacuum; and
- The soil gas concentrations taken in proximity to the proposed extraction well locations represent the worst-case scenario for SVE gas concentrations.

Find attached the estimated emissions, a project description and completed forms and checklists for this project.

Should you have any questions concerning this application, its checklists, forms, or any of the supporting documentation, please contact me at (210) 295-7432.

Sincerely,

Jason Shirley
Installation Manager

Attachments: Supporting Information
Forms: PI-7 and Core Data
Checklists: Quick-Check Applicability, § 106.262, and § 106.533

cc: Mr. Rick Hite
TCEQ Region 13

Mr. Kent Grubb
U.S. Army, Army Medical Command, Fort Sam Houston, Staff Judge Advocate

Ms. Kyle Cunningham
San Antonio Metropolitan Health District

Ms. Julie Burdey
Parsons

Certification

This validates the calculations of the attached Permit By Rule application for a new soil vapor extraction (SVE) system to pilot test remediation of Solid Waste Management Unit B-3 at Camp Stanley Storage Activity in Boerne, Texas. After reviewing the basis for each assumption, the SVE design conditions and the emissions calculations, I attest that the assumptions, design conditions and calculations are in accordance with good engineering practices and that the calculations, which use soil gas survey data from the site, have been done correctly. Based on my analysis, the results are proper and correct, and they accurately predict the emissions that will result from operating the SVE system at the specified conditions.

I certify under the penalty of law that this document and all its attachments were prepared by me or were prepared under my direction, supervision or review. Based on my knowledge and inquiry of the person or persons who performed the associated tasks, or those persons directly responsible for gathering the information, the results submitted are, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Henry C. Dress, P.E.

Texas License No. 81023

February 12, 2004

SWMU B-3

SOIL VAPOR EXTRACTION PILOT SYSTEM

PERMIT BY RULE APPLICATION

Camp Stanley Storage Activity

Boerne, Texas

December 2003

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§ 106.262 Checklist ..... 2 pages
§ 106.533 Checklist ..... 1 page

PROCESS DESCRIPTION
SOIL VAPOR EXTRACTION PILOT STUDY

Introduction

The proposed project will implement a pilot study using soil vapor extraction (SVE) to test remediation of chlorinated chemicals around and underlying Solid Waste Management Unit (SWMU) B-3, which is a contaminated site at Camp Stanley Storage Activity (CSSA) near Boerne, Texas.

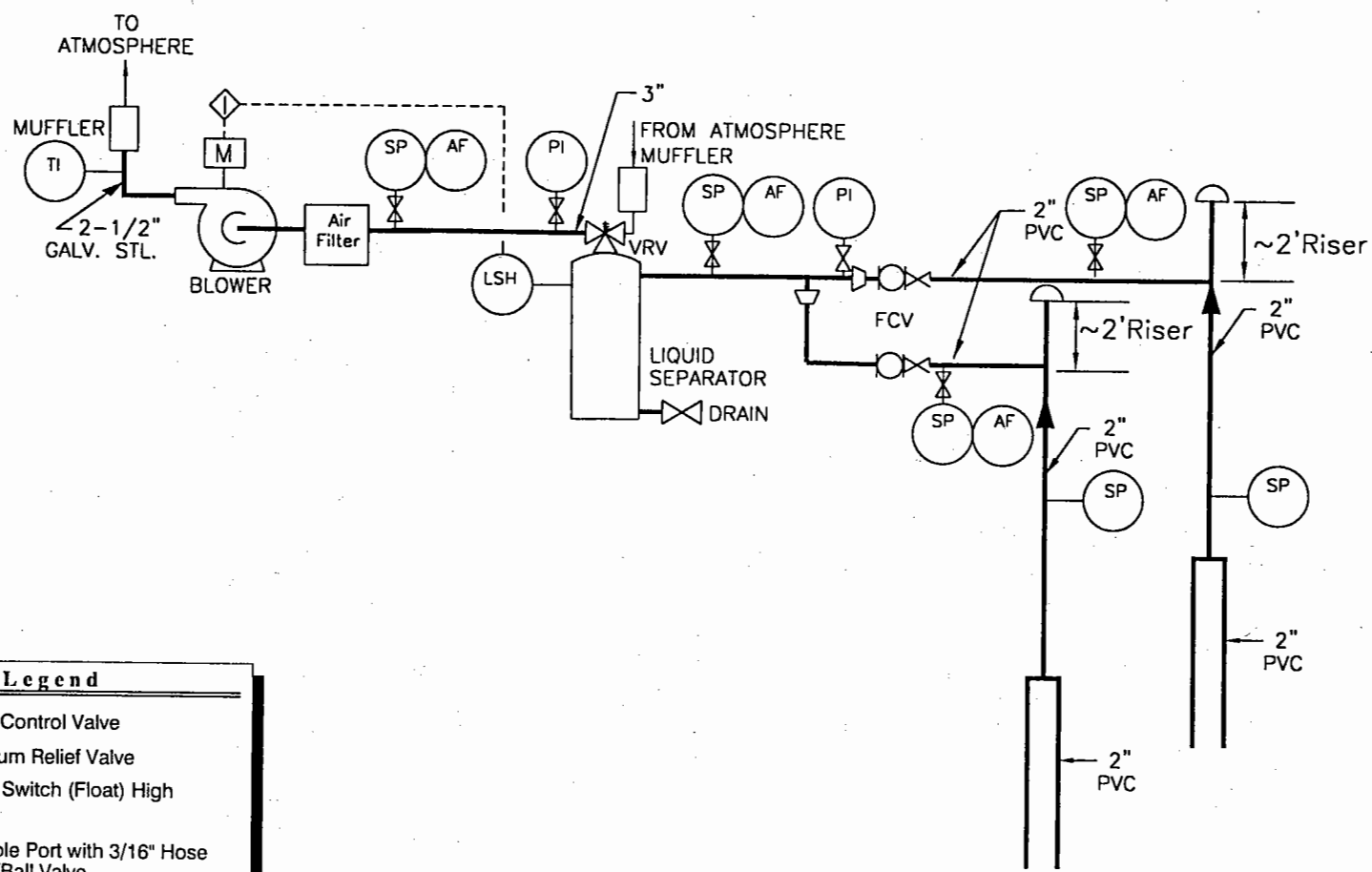
The soils and groundwater in proximity to SWMU B-3, which is a former landfill area, were contaminated with chlorinated volatile organic compounds (VOCs) as a result of unknown historical activities. This project will install an SVE system to test extraction of chlorinated VOCs from the contaminated groundwater bearing unit beneath the former landfill.

Background

Remediation has previously been attempted at this site utilizing SVE. Standard Exemption permit number 32405 was first approved in 1996 for a small SVE system that was installed to remediate the contaminated soil matrix. The system was modified in 1999 to allow a larger 18 well system since permeability of the wells in the soil matrix was poor. That SVE system was subsequently demolished so that the most contaminated portions of the former landfill could be excavated and disposed offsite. This remedial action will address residual contamination of the underlying bedrock.

Technical Approach

This project will install an SVE system consisting of at least two vapor extraction wells (VEWs) and a regenerative blower system to test extraction of contaminants from the subsurface groundwater bearing limestone unit to remediate residual contamination of the site. The new blower will apply a higher vacuum and a higher per well flowrate than the former system to test whether more aggressive action within the underlying limestone will be effective at removing contaminant mass and reducing migration to groundwater. Data will be collected in the event that it proves effective, a larger scale system can be designed for installation. Figure 1 provides a process flow schematic of the proposed SVE pilot system.



Legend

FCV	Flow Control Valve
VRV	Vacuum Relief Valve
LSH	Level Switch (Float) High
SP	Sample Port with 3/16" Hose Bard/Ball Valve
AF	Flow Measuring Port
PI	Pressure or Vacuum Indicator
TI	Temperature Indicator

Not to Scale

Figure 1

Blower System Schematic
Flow Diagram - SWMU B-3 SVE Pilot System
December 2003
Camp Stanley Storage Activity

PARSONS

736071 CS[illegible]3 PFD.DWG

Basis for Emissions Calculations

Two soil gas samples taken in September 2003 revealed the presence of five chlorinated hydrocarbon contaminants some of which are the byproducts of degradation or natural attenuation. These chlorinated hydrocarbons has been found at the following maximum soil gas concentrations:

Table 1

Concentrations of Contaminants in Soil Gas Samples[1] at SWMU B-3

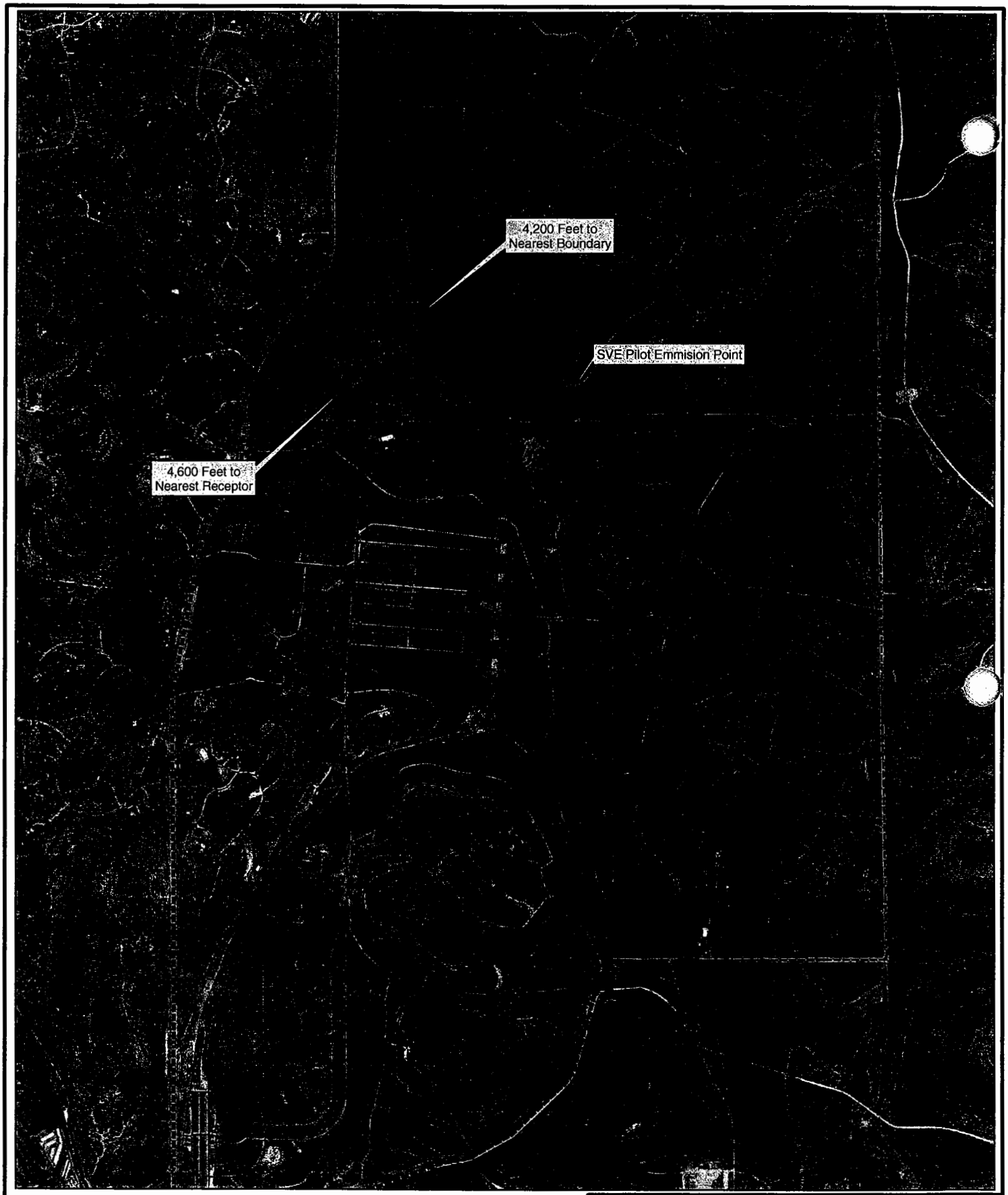
Compound	Maximum Soil Gas Conc. Analyzed	
	ppbv	ppmv
Vinyl chloride	7,463	7.46
trans-1,2-dichloroethene	12,759	12.76
cis-1,2-dichloroethene	517,645	517.65
Trichloroethene	168,367	168.37
Tetrachloroethene	566	0.57

1. Samples collected 9/8/2003.

These concentrations would not be expected to be typical for the duration of an SVE operation, since soil gas concentrations always start at a maximum and decrease exponentially.

Locations

The location diagram as shown on Figure 2 indicates the respective distances from the facility to the nearest property boundary and the nearest off-property receptor. The distance from SWMU B-3 to the nearest property boundary is 4200 feet. The distance from SWMU B-3 to the nearest off-property receptor is 4600 feet.



N
W E
S

CSSA Boundary

0 1,000 2,000 4,000
Feet

December, 2003

Figure 2

SWMU B-3
Location Diagram

PARSONS

J:\736071\GIS\B3_PBR_Location_Diagram.mxd

SWMU B-3 SVE ESTIMATED EMISSIONS

Calculations

Speciated chlorinated hydrocarbon emission rates and the calculated emission limits derived from Permit By Rules § 106.533 and 106.262 are presented in Table 2. The worst-case scenario is to calculate the emissions using the maximum soil gas concentrations analyzed from the two soil gas samples collected that will be in proximity to the proposed SVE wells. Emissions were also estimated using the E=L/K calculation. A final comparison was made of the results from the worst-case scenario calculations, E=L/K calculations and the allowable maximum emission rates to establish the emission limits.

Estimates are based on an operating point of 200 actual cubic feet per minute (ACFM) blower flowrate at a vacuum of 80 in. WC and a temperature of 60°F, which is equivalent to 163 standard cubic feet per minute (SCFM). Contaminant emission limits are determined three ways:

1. Calculated using the equation E=L/K from Rule § 106.262 where L is the compound specific limit in milligrams per cubic meter and K is the factor which is a function of distance to the nearest receptor;

2. Calculated using contaminant concentration and blower volumetric flowrate assuming the ideal gas law and in the following form, and:

$$MW\left(lb/lbmole\right)\times SoilGasConc\left(ppmv\right)\times GasFlowRate\left(SCFM\right)\times 1.56\times 10^{-7}\left(\frac{lbmole\cdot minute\cdot ppmv}{ft^{3}\cdot hr}\right)$$

3. Determined according to the Rules as Allowable maximum rates.

Emissions Summary

Chemical Compound	CAS #	L mg/m^3	E Exempt Emission Rate lb/hr	Molecular weight, lb/lb-mol	Soil Gas Conc., ppmv	Calculated Emission Rate lb/hr	Calculated Emission Rate tons/yr*	Allowable Emission Rate lb/hr	Allowable Emission Rate tons/yr
Vinyl chloride	75-01-4	2	0.25	62.50	0.45	0.0	0.00	6.00	5.0
trans-1,2-dichloroethene	156-60-5	793	99.1	96.94	2.30	0.0	0.03	1.0	4.4
cis-1,2-dichloroethene	156-59-2	793	99.1	96.94	6.98	0.0	0.09	1.0	4.4
Trichloroethene	79-01-6	135	16.9	131.39	168.37	0.7	3.02	6.00	5.0
Tetrachloroethene	127-18-4	33.5	4.2	165.83	0.57	0.0	0.01	6.00	5.0
					TOTAL EMISSIONS	0.7	3.2	20.0	23:8

Basis: Volumetric flowrate for calculation is based on 163 SCFM.
Distance to nearest receptor is > 3000 feet, therefore, a K value of 8 was used for all E=L/K calculations
L values for 1,1-dichloroethene, trans-1,2-dichloroethene, and cis-1,2-dichloroethene are ACGIH TWAs (1997)
Soil gas concentrations taken from two boreholes, the highest concentrations from each assumed to be worst-case.
* Assumes operation 24 hours per day, 7 days per week and 52 weeks per year.

Conclusion:

The speciated emission rates calculated using the equation E=L/K from Rule § 106.262 exceed the rates allowable by the Rule so they cannot be used to demonstrate compliance with Permit By Rule limitations. In contrast, the rates calculated using the soil gas concentrations, the blower volumetric flowrate and assuming the ideal gas law are lower than the maximum rates allowed by the Rule, both on an hourly and an annual basis. Therefore, the unit is eligible for a permit under the Permit By Rule criteria.

Texas Commission on Environmental Quality
REGISTRATION FOR PERMITS BY RULE
FORM PI-7

Directions: 1. Complete the Form PI-7. *2. Use Instructions as needed.* *3. Submit registration.*

Overview:

Facilities that may release air contaminants, even in small amounts, are regulated by the Texas Commission on Environmental Quality (TCEQ) under its air permit rules. Facilities that do not emit a "significant" amount of air contaminants (as defined by rules) may claim a Permit by Rule (PBR) prior to constructing a new facility or making changes to an existing facility. A PBR claim must meet both the general and specific requirements in Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106), but does not require an extensive technical review. The TCEQ also has a Reference Table available to assist you in determining some of the other state or federal requirements you may need to know (see "How to Contact the TCEQ" below for web sites). If a facility or site needs to establish a federally enforceable emission limit, a separate certification form is required. Refer to 30 TAC §106.6 for more information.

A PBR may be claimed when both the following conditions are met:

1. The facility meets **all** applicable eligibility requirements of 30 TAC § 106.4. These requirements include a limit on the amount of annual emissions to less than federal permit major source levels, and continuing compliance with all state and federal regulations.
2. The facility meets **all** applicable conditions of one or more individual PBRs contained in 30 TAC Chapter 106. These requirements may specif design requirements for certain facilities, production or material use limits, and operational restrictions.

To claim a PBR, you should:

1. read the requirements of 30 TAC § 106.4 and the specific PBR you want to claim;
2. determine if the facility meets all the eligibility requirements of 30 TAC § 106.4;
3. determine if the facility meets all the applicable requirements of the specific PBR;
4. begin construction immediately if the facility meets the requirements of 30 TAC § 106.4 and the PBR does not require registration;
5. begin construction when the Form PI-7 and attachments are submitted to the TCEQ if the PBR requires registration, but does not require site approval; or
6. do not begin construction until you are notified by the TCEQ if the specific PBR requires registration and written site approval.

If you are already operating, you still need air authorization. You should begin steps to seek an authorization as soon as you become aware tha this requirement applies to you.

How to Contact the TCEQ

Question	Who	Phone	Web
TCEQ PBR Rules	Air Permits Division	(512) 239-1250	www.tnrcc.state.tx.us/oprd/rules/indxchap.html#106 or www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/seindex.htm
Core Data Form Requirements	Central Registry	(512) 239-5175	www.tnrcc.state.tx.us/permitting/projects/cr
Form PI-7 Requirements	Air Permits Division	(512) 239-1250	www.tnrcc.state.tx.us/permitting/airperm
Receipt and Initial Review	Permits Administrative Review (PAR) Section	(512) 239-5160	www.tnrcc.state.tx.us/permitting/r_e/par
PBR Guidance and Checklists	Air Permits Division	(512) 239-1250	www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/exempt.htm
Confidential Information	Office of Legal Services	written requests	(TCEQ Mail Code 173)
Emissions Cap and Trade Program	Banking & Trading Team, Air Permits Division	(512) 239-1255	www.tnrcc.state.tx.us/permitting/airperm/banking
Federal Operating Permits	Operating Permit Section Air Permits Division b	(512) 239-1250	www.tnrcc.state.tx.us/permitting/airperm
Small Business Assistance	Small Business and Local Government Assistance	(800) 447-2827	www.tnrcc.state.tx.us/exec/sbea/sblga.html

I. REGISTRANT INFORMATION

A. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached? ☒ YES ☐ NO *If "NO," please indicate the following*

TCEQ Customer Reference Number CN - TCEQ Regulated Entity Number: RN - 102689676

B. Company or Other Legal Customer Name *(must be same as Core Data "Customer")*: Department of the Army, Camp Stanley Storage Activity

Company Official Contact Name: Jason Shirley Title: Post Commander

Mailing Address: 25800 Ralph Fair Rd.

City: Boerne State: TX Zip Code: 78015

Phone: 210-221-7461 Fax: E-mail:

C. Technical Contact Name: Brian Murphy Title: Environmental Officer

Company: Department of the Army, Camp Stanley Storage Activity

Mailing Address: 25800 Ralph Fair Rd.

City: Boerne. State: TX Zip Code: 78105

Phone: 210-698-5208 Fax: 210- 295-7386 E-mail: murphyb@campstanley.net

D. Facility Location Information Street Address: 25800 Ralph Fair Rd

If no street address, provide written driving directions to the site: *(attach description if additional space is needed)*

City: Boerne County: Bexar Zip Code: 78105

II. FACILITY AND SITE INFORMATION

A. Name and Type of Facility: SWMU B-3 SVE Unit ☐ PERMANENT ☐ PORTABLE

B. Permits by Rule (PBR) claimed under 30 TAC § 106 *(List all)*: §106. 533 . 262 . _____ . _____

C. Are you registering a grandfathered facility? *If "YES," attach documentation of construction date.* ☐ YES ☒ NO

D. Is there a previous Standard Exemption or PBR **for the facility in this registration**? *(Attach details regarding changes)* ☒ YES ☐ NO
If "YES," list Registration No.: 32405
If "YES," list Rule No.: 106.533, 106.262

E. Are there any **other facilities** at this **site** which are **authorized by an air Standard Exemption or PBR**? ☒ YES ☐ NO
If "YES," list Registration No.: 32406 & 32407
If "YES," list Rule No.: 106.262, 106.433

F. Are there any **other air preconstruction permits** at this site? ☒ YES ☐ NO If "YES," list Permit Nos: 29466

G. Is this **site** required to obtain an air **federal operating** permit? ☐ YES ☒ NO If "YES," list Permit Nos.:

H. TCEQ Account Identification Number *(if known)*: BG-0841S

III. FEE INFORMATION

A. Is a fee required? *If "YES," to either of the following two questions, a fee is not required and skip to Section IV. If both answers are "NO," go to Question B.*

Is this registration an update to a previously registered facility and accompanied by a Certification Form solely to establish a federally enforceable emission limit? ☐ YES ☒ NO

Is this registration for a Remediation project which is reimbursable by the TCEQ? ☐ YES ☒ NO LPST No.:

B. What is the fee amount? *If "YES," to any of the following three questions, a **$100 fee** is required. Otherwise, a **$450 fee** is required.*

Does this business have less than 100 employees? ☐ YES ☒ NO

Does this business have less than 1 million dollars in annual gross receipts? ☐ YES ☒ NO

Is this registration submitted by a governmental entity with a population of less than 10,000? ☐ YES ☒ NO

C. Check/Money Order/Transaction No.: Name on Check: Fee Amount: $450

IV. SELECTED FACILITY REVIEWS ONLY - TECHNICAL INFORMATION

Note: If claiming one of the following PBRs, complete this section, then skip to the "Signature for Registration" Section below.

Auto Body Refinishing Facilities (30 TAC § 106.436) | **Livestock Auction Facilities (30 TAC § 106.162)**
Trench Burners (30 TAC §106.496) | **Animal Feeding Operations (30 TAC § 106.161)**
Saw Mills (30 TAC § 106.223) | **Grain Handling, Storage and Drying (30 TAC § 106.283)**

A. Is the **required** PBR checklist attached which shows the facility meets all **general** and **specific** requirements of the PBR(s) being claimed?	☐ YES ☐ NO
B. Distance from this facility's emission release point to the nearest property line:	_____ Feet
Distance from this facility's emission release point to the nearest off-property structure:	_____ Feet

V. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS

Registrants must be in compliance with all applicable state and federal regulations and standards to claim a PBR.

A. Is confidential information submitted and properly marked with this registration?	☐ YES ☒ NO
B. Is a process flow diagram or a process description attached?	☒ YES ☐ NO
C. Are emissions data and calculations for this claim attached?	☒ YES ☐ NO
D. Is information attached showing how the **general** requirements (30 TAC § 106.4) of the PBR is met for this registration? *(PBR checklists may be used, but are optional)*	☒ YES ☐ NO

Note: Please be reminded that if the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3, the owner/operator of these facilities must possess NO_X allowances equivalent to the actual NO_X emissions from these facilities.

E. Is information attached showing how the **specific PBR** requirements are met for this registration? *(PBR checklists may be used, but are optional)*	☒ YES ☐ NO
F. Distance from this facility's emission release point to the nearest property line:	4,200 Feet
Distance from this facility's emission release point to the nearest off-property structure:	4,600 Feet

Note: In limited cases, a map or drawing of the site and surrounding land use may be requested during the technical review or at the request of the TCEQ Regional Office or local air pollution control program during an investigation.

VI. SIGNATURE FOR REGISTRATION

The signature below indicates that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the facility will satisfy the conditions and limitations of the indicated permit by rule. The facility will operate in compliance with all regulations of the Texas Commission on Environmental Quality and with U.S. Environmental Protection Agency regulations governing air pollution.

NAME: JASON SHIRLEY SIGNATURE: Jason Shirley DATE: 13 Feb 04

VII. COPIES OF THE REGISTRATION - Copies must be sent as listed below. Processing delays may occur if copies are not sent as noted.

Who	*Where*	*What*
Permits Administrative Review (PAR) Section, TCEQ	**Regular, Certified, Priority Mail** MC 161, P.O. Box 13087, Austin, Texas 78711-3087 **Hand Delivery, Overnight Mail** MC 161, 12100 Park 35 Circle, Building F, First Floor, Room 1206, Austin, Texas 78753 OR **Facsimile** (512) 239-2123 (*do not follow fax with paper copies*)	Originals - Form PI-7, Core Data Form; all attachments
Revenue Section, TCEQ	**Regular, Certified, Priority Mail** MC 214, P.O. Box 13088, Austin, Texas 78711-3088 **Hand Delivery, Overnight Mail** MC 214, 12100 Park 35 Circle, Building A, Third Floor, Austin, Texas 78753	Original Money Order or Check Copy of Form PI-7 and Core Data Form
Appropriate TCEQ regional office	To find your regional office address, go to the TCEQ Web site at www.tnrcc.state.tx.us, or call (512) 239-1250	Copy of Form PI-7, Core Data Form, and all attachments
Appropriate local air pollution control program(s)	To find your local air pollution control programs go to the TCEQ, APD Web site at www.tnrcc.state.tx.us/permitting/airperm, or call (512) 239-1250	Copy of Form PI-7, Core Data Form, and all attachments

TCEQ Core Data Form

TCEQ Use Only

If you have questions on how to fill out this form or about our Central Registry, please contact us at 512-239-5175.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.

SECTION I: General Information

1. Reason for Submission *Example: new wastewater permit; IHW registration; change in customer information; etc.*

Modified Soil Vapor Extraction System

2. Attachments				**Describe Any Attachments:** *(ex: Title V Application, Waste Transporter Application, etc.)*
✓	**YES**		**NO**	*Form PI-7, Quick-Check Checklist, 106.262. Checklist, 106.533 Checklist and Calculations*

3. Customer Reference Number-*if issued*			**4. Regulated Entity Reference Number-*if issued***		
CN		*(9 digits)*	**RN**	*102689676*	*(9 digits)*

SECTION II: Customer Information

5. Customer Role *(Proposed or Actual)* -- As It Relates to the Regulated Entity Listed on This Form

Please check one of the following:		Owner		Operator	✓	Owner and Operator
	Occupational Licensee		Volunteer Cleanup Applicant			Other
TCEQ Use Only		**Superfund**		**PST**		**Respondent**

6. General Customer Information

	New Customer		Change to Customer Information
	Change in Regulated Entity Ownership	✓	No Change *

***If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.**

7. Type of Customer:		Individual		Sole Proprietorship - D.B.A.
	Partnership		Corporation		Federal Government
	State Government		County Government		City Government
	Other Government		Other:		

8. Customer Name *(If an individual, please print last name first)*	*If new name, enter previous name:*

9. Mailing Address:				
City	State	ZIP	ZIP + 4	

10. Country Mailing Information *if outside USA*	**11. E-Mail Address *if applicable***

12. Telephone Number	**13. Extension or Code**	**14. Fax Number *if applicable***

15. Federal Tax ID *(9 digits)*	**16. State Franchise Tax ID Number** *if applicable*	**17. DUNS Number** *if applicable* *(9 digits)*

18. Number of Employees										**19. Independently Owned and Operated?**			
	0-20		**21-100**		**101-250**		**251-500**		**501 and higher**		**Yes**		**No**

SECTION III: Regulated Entity Information

20. General Regulated Entity Information

	New Regulated Entity		Change to Regulated Entity Information	✓	No Change*

*If "No Change" and Section I is complete, skip to Section IV - Preparer Information.

21. Regulated Entity Name *(If an individual, please print last name first)*				
22. Street Address (No PO Boxes)				
	City	State	ZIP	ZIP + 4
23. Mailing Address				
	City	State	ZIP	ZIP + 4
24. E-Mail Address:				

25. Telephone Number	26. Extension or Code	27. Fax Number *if applicable*

28. Primary SIC Code (4 digits)	29. Secondary SIC Code (4 digits)	30. Primary NAICS Code (5 or 6 digits)	31. Secondary NAICS Code (5 or 6 digits)

32. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description)

Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.

33. County	
34. Description of Physical Location	

35. Nearest City	State	Nearest Zip

36. Latitude (N)			*37. Longitude (W)*		
Degrees	*Minutes*	*Seconds*	*Degrees*	*Minutes*	*Seconds*

38. TCEQ Programs In Which This Regulated Entity Participates *Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "Unknown".* If you know a permit or registration # for this entity, please write it below the program."

	Animal Feeding Operation		Petroleum Storage Tank		Water Rights
	Title V - Air		Wastewater Permit		
	Industrial & Hazardous Waste		Water Districts		
	Municipal Solid Waste		Water Utilities		Unknown
	New Source Review - Air		Licensing - TYPE(s)		

Section IV: Preparer Information

39. Name	40. Title
Henry Dress, PE	*Principal Engineer*

41. Telephone Number	42. Extension or Code	43. Fax Number *if applicable*
512-719-6063		*512-719-6099*

44. E-mail Address:	*henry.dress@parsons.com*

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
AIR PERMITS DIVISION

TITLE 30 TAC § 106.4 "QUICK-CHECK" APPLICABILITY CHECKLIST

Company Name: *Department of the Army, Camp Stanley Storage Activity*
Checklist completed by: *Henry Dress, PE Parsons* Date: *12-30-03*
Facility Type: *Soil Vapor Extraction System*
Permit(s) by rule claimed: 30 TAC Chapter §106: *533 & 262*
Project Description (including equipment, materials, and brief process description):
The proposed project will implement a pilot study using soil vapor extraction (SVE) to test remediation of chlorinated chemicals underlying Solid Waste Management Unit (SWMU) B-3, which is a former landfill.

The soils and groundwater in proximity to SWMU B-3 were contaminated with chlorinated volatile organic compounds (VOCs). This project will install an SVE system with a regenerative blower to test extraction of chlorinated VOCs under vacuum from the contaminated groundwater bearing unit beneath the site.

List the maximum annual emission rates, in **TONS PER YEAR (TPY)**, for this project:

CO *None*	NO_x *None*	VOC *3.2*
PM *None*	SO_2 *None*	Other *None*

The following questions require a "Yes" or "No" answer to be indicated for this permit by rule claim:

A. Title 30 TAC § 106.4(a)(5): Current Permit by Rule Requirements

Yes☒ No☐ Have you checked to determine if this exempt project is being claimed under the current version of 30 TAC 106?
If "Yes", continue to next question
If "No", please contact the TNRCC Air Permits Division for a copy of the current permit by rule to be claimed.

B. Title 30 TAC § 106.4(a)(7): Permit by rule prohibition check

Yes☐ No☒ Are there any air permits under the same account containing permit conditions, which prohibit or restrict the use of permits by rule?
If "No", continue to next question
If "Yes", permits by rule may not be used or their use must meet the restrictions of the permit.
A new permit or permit amendment may be required.
List permit number(s): _____

C. Title 30 TAC § 106.4(b): Circumvention check

Title 30 TAC § 106.4(b) states "No person shall circumvent by artificial limitations the requirements of §116.110 of this title (covering permitting)." Circumvention by artificial limitations may include but is not limited to:

A. dividing a complete project into separate segments to circumvent §106.4(a)(1) limits;
B. claiming feed or production rates below the physical capacity of the project's equipment in order to begin constructing facilities before a permit or permit amendment is approved for full scale operations, particularly when the unit will not be economically viable at less than permitted capacity;
C. claiming a limited chemical list in order to begin constructing facilities before a permit or permit amendment is approved for additional chemicals, particularly when the unit will not be economically viable until the additional chemicals are authorized.

Yes☐ No☒ Does your project meet any of the criteria listed above?
If "No", continue to next rule question
If "Yes", a permit by rule may not be claimed

D. Title 30 TAC § 106.4(c) and (d): Compliance with all Rules

Yes☒ No☐ Will the facility comply with all rules and regulations of the TNRCC, the intent of the Texas Clean Air Act, and any local permitting or registration requirements?
If "Yes", continue to next rule question
If "No", a permit by rule may not be claimed.

E. Title 30 TAC § 106.4(a)(1): Emission limits check

Yes☒ No☐ The maximum emissions from all facilities at the site, including this permit by rule claim, are less than 25 tpy of any contaminant.
If the answer to this questions is "Yes", no further review is needed to complete this checklist.
Forward all information needed to verify your permit by rule claim to the TNRCC.
If "No", this checklist cannot be used. Please complete the standard 30 TAC § 106.4 Applicability Checklist

Exemption §106.262 Checklist
(Previously Standard Exemption 118)
Facilities (Emission and Distance Limitations)

This exemption requires registration with a PI-7 and submittal of supporting documentation within ten days of installation or modification of facilities.

The following checklist has been developed to help you confirm that you meet the requirements of Exemption §106.262, previously Standard Exemption 118 (STDX 118). **Any "no" answers indicate that the claim of exemption may not meet all the requirements for the use of Exemption §106.262.** If you do not meet all the requirements, you may alter the project design/operation in such a way that all requirements of the exemption are met or obtain other authorization (i.e. construction permit, standard permit, etc.).

YES	NO	NA	DESCRIPTION
✓	_	_	Have you included a description of how this exemption claim meets the general rule for the use of standard exemptions? (A §106.4 checklist is available to satisfy this demonstration.)
✓	_	_	Have you reviewed all other exemptions to ensure that none would have authorized the proposed construction or change had all requirements of the exemption been met?
_	_	✓	If this claim is to qualify the use of other chemicals at a facility authorized by another exemption, are all the requirements of that specific exemption met? (Include a description of how that exemption's requirements are met.)
✓	_	_	Is each emission source located at least 100 feet from any recreational area, residence, or other structure not occupied or used solely by the owner or operator of the facilities or the owner of the property upon which the facilities are located? (Attach a scaled map.)
✓	_	_	Do all the chemicals that will be part of new or changed emissions at the facility appear in Table 262 or in the 1997 version of the list of Threshold Limit Values (TLV) published by the American Conference of Governmental Industrial Hygienists? (List the compounds and their L value from Table 262 or their TLV.)
✓	_	_	Are the calculated new or increased emissions, including fugitives, for each chemical less than or equal to 5 tons per year? (Attach calculations.)
✓	_	_	Are the calculated new or increased emissions, including fugitives, for each chemical less than or equal to "E" pounds per hour as determined using the formula in §106.262(3),or 6 pounds per hour, whichever is lower? (Attach both the "E" and emissions calculations for each compound.)
✓	_	_	Has a completed PI-7 been submitted?

Are the following included with the PI-7 notification form:

✓	—		description of the project?
✓	—		emission calculations?
✓	—		data identifying specific chemical names (MSDS, CAS number, etc.)?
✓	—		limit (L) values?
✓	—		distance (D) values? and
—	—	✓	description of control equipment, if any?

✓	—	—	Are all the facilities in which the compounds listed in §106.262(e) are handled, located at least 300 feet from the nearest property line and 600 feet from the nearest off-property receptor? (Attach scaled map showing the effected facilities, the nearest fence lines, and receptors.)
—	—	✓	Are the total on-property quantities of each compound listed in §106.262(5) less than or equal to 500 pounds? (This requirement does not apply to permit authorizations.)
—	—	✓	Are all compounds listed in §106.262(5) handled only in unheated containers operated in compliance with U.S. Department of Transportation Regulations (49 CFR 171 through 178)?
—	—	✓	Are the containers containing chemicals listed in §106.262(5) not vented or opened directly to the atmosphere? (Attach descriptions as necessary.)
—	—	✓	For physical changes or modifications to existing facilities, does all air pollution abatement equipment remain unchanged (i.e. no change or addition is allowed)? (This requirement does not mean that new facilities may not have control equipment.)
✓	—	—	Will all visible emissions, except uncombined water, have opacity less than or equal to 5 percent in any five-minute period?

Exemption §106.533 Checklist
(Previously Standard Exemption 68)

Contaminated Water and Soil Remediation Equipment

REGISTRATION IS REQUIRED BEFORE CONSTRUCTION OF FACILITIES COVERED BY THIS EXEMPTION MAY BEGIN

The following checklist is designed to help you confirm that you meet Exemption §106.533, previously standard exemption 68 (STDX 68), requirements. **Any "no" answers indicate that the claim of exemption may not meet all requirements for the use of Exemption §106.533, previously standard exemption 68.** If you do not meet all the requirements, you may alter the project design/operation in such a way that all the requirements of the exemption are met or obtain a construction permit.

YES	NO	NA	DESCRIPTION
✓			Have you included a description of how this exemption claim meets the general rule for the use of exemptions (§106.4 checklist is available)?
✓			Will the remediation be at the property where the contamination originally occurred or at a nearby property secondarily affected by the contamination?
		✓	Is the total emissions rate of petroleum hydrocarbons (except benzene) less than or equal to one (1) pound per hour? Attach calculations and supporting data such a soil/water contaminant concentrations.
		✓	Do benzene emissions meet the emissions limits of §106.262, previously STDX 118(c)? Attach calculations, contaminant concentrations, and a scaled map showing the emission(s) point(s) and nearby off-property receptors.
✓			Do chemical emissions other than those from petroleum hydrocarbons meet the requirements of §106.262, previously STDX 118(b) and (c)? Attach calculations, contaminant concentrations, and a scaled map showing the emission(s) point(s).
✓			Will the handling, processing, and conditioning of contaminated and remediated soil be free of visible emissions (except for moisture)?
		✓	If you use abatement equipment to meet the exemption's emissions limits, does it completely satisfy one of the conditions stated in §106.533, previously STDX 68(e)(1)-(4)? Which one? _____ Describe the abatement process in an attachment.