

ORDNANCE SYSTEMS INC.
Radford Army Ammunition Plant
4050 Pepper's Ferry Road
Radford Virginia 24141

May 15, 2015

Leslie Romanchik
Hazardous Waste Program Manager
Virginia Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219

**Subject: RFAAP Incinerator Permit Application 2nd NOD Response
Radford Army Ammunition Plant, Radford, Virginia
EPA ID#: VA1210020730**

Dear Ms. Romanchik:

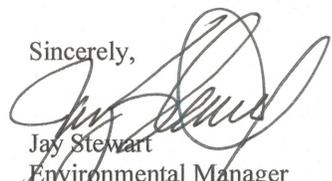
Attached, please find our responses to the second notice of deficiency (NOD) issued by the Virginia Department of Environmental Quality (DEQ) March 20, 2015, for the Incinerator Resource Conservation and Recovery Act (RCRA) renewal application submitted in April 2012. For each NOD provided by DEQ, we have summarized our conversations to date, made additional comments where appropriate, and summarized the action items resulting from the NOD.

Along with each of the responses, we have provided a proposed submittal date for the revised application materials addressed by each NOD. As agreed previously with DEQ during our December 2014 and January 2015 meetings, we have structured this schedule into several tiers or phases of submittal based on the complexity of the adjustment that is required. These tiers are proposed as follows:

- Tier 1 items - We propose submitting the revised application materials within 90 days of your written concurrence on this response letter. (Note that this represents the vast majority of the required revisions).
- Tier 2 items - We propose submitted the revised application materials with 120 days of your written concurrence on this response letter. These items require a more involved response that requires coordination with third parties or our command group.
- Tier 3 items - We are not proposing a submittal schedule at this time as these items will require further DEQ review and comment before we can prepare the complete response. These include outstanding questions concerning the Contingency Plan and the Risk Assessment Protocol. We recognize that the response to these items will depend on DEQ resource availability and subsequent communications. We will continue to work in a progressive manner with DEQ on these issues.

If you have any questions or concerns regarding our responses or the outstanding items we have identified, please contact Mr. Matt Alberts at 540/639-8722 (matt.alberts@baesystems.com).

Sincerely,



Jay Stewart
Environmental Manager
BAE Systems, Ordnance Systems Inc.

Enclosure

c: Russ McAvoy, VDEQ-CO

Coordination: 
McKenna

bc: J. Stewart, BAE Staff
J. McKenna, Government Staff
Matt Alberts, BAE Staff
Michele Gehring, Coterie Environmental
Env. File