



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4020  
1-800-592-5482

July 21, 2015

### VIA ELECTRONIC MAIL

Mr. Jay Stewart  
Environmental Manager  
BAE Systems, Ordnance Systems, Inc.  
Radford Army Ammunition Plant  
4050 Pepper's Ferry Road  
Radford, Virginia 24141

**Re: Notice of Deficiency Addressing the Administrative Completeness of the Part A and Part B Permit Applications for the Renewal of the Subpart X Open Burning Permit Radford Army Ammunition Plant, Radford, VA  
EPA ID No. VA1210020730**

Dear Mr. Stewart:

The Part A and B permit applications for the renewal of the Hazardous Waste Subpart X Open Burning Permit at the Radford Army Ammunition Plant's (RAAP), Radford, Virginia facility, dated June 3, 2015, was received on June 15, 2015. In accordance with the Virginia Hazardous Waste Management Regulations as codified in Title 9 of the Virginia Administrative Code, Agency 20, Chapter 60 (9 VAC 20-60), this letter constitutes the Virginia Department of Environmental Quality's, Office of Waste Permitting and Compliance's (DEQ's) first completeness review of the Subpart X Open Burning Part A and B Permit applications.

Based on the review of the facility's permit application, additional information will need to be submitted in response to the DEQ's comments. Please review the comments and submit the requested response on a comment by comment basis within 30 days of your receipt of this letter (August 20, 2015). If more time is needed, please contact me at the email address or phone number listed below prior to the expiration of the 30 day deadline.

Please submit the responses to the DEQ in the form of one hard copy and a CD in PDF format (or electronically attached to an e-mail) and a CD in Microsoft WORD format (or electronically attached to an e-mail), and submit the responses to the EPA and the DEQ's Blue Ridge Regional Office in the CD PDF format. Please be advised that the DEQ requires all sections of the application to be in an electronic format, including drawings. The DEQ does not have the capability to copy large drawings, i.e., anything over 11 inches by 17 inches.

Mr. Jay Stewart  
Environmental Manager  
Radford Army Ammunition Plant  
July 21, 2015  
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If you should have any questions regarding these comments, please contact me at (804) 698-4467 or by email at [Ashby.Scott@deq.virginia.gov](mailto:Ashby.Scott@deq.virginia.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Ashby R. Scott', written in a cursive style.

Ashby R. Scott  
Hazardous Waste Permit Writer  
Office of Waste Permitting and Compliance

Attachments:

Notice of Deficiency —Notice of Deficiency Addressing the Administrative Completeness of the Part A and Part B Permit Applications for the Renewal of the Subpart X Open Burning Permit

cc: Central Hazardous Waste Files  
Andrea Barbieri, EPA, Region III (3LC50)  
Aziz Farahmand, DEQ, BRRO  
Leslie Romanchik, Russ McAvoy, Sonal Iyer, Julia King-Collins, Hasan Keceli, Kurt Kochan, DEQ, CO

Jim McKenna, Radford Army Ammunition Plant

**Notice of Deficiency Addressing the Administrative Completeness of the Part A and Part B Permit Applications for the Renewal of the Subpart X Open Burning Permit**

1. The application does not contain traffic information as required by checklist item B-4. Please either indicate where this information is included in the permit or provide a revised application which includes this information.
2. The application does not contain language which provides a report or demonstration of the effectiveness of the thermal treatment of waste in the burning pans based on laboratory or field data as required by checklist item C-1g. Please either indicate where the language is included in the permit application or provide a revised permit application which includes this information.
3. The application does not contain language which describes the procedures used to inspect and/or analyze a representative portion of wastes generated off-site from the New River Unit. Please either indicate where the language is included in the permit or provide a revised application which includes the information required by checklist item C-2e.
4. The application does not contain language which provides a report or demonstration of the effectiveness of the thermal treatment of waste in the burning pans based on laboratory or field data as required by checklist item D-8c. Please either indicate where the language is included in the permit application or provide a revised permit application which includes this information.
5. The application does not contain language which demonstrates the prevention of hazards in unloading operations (e.g., use of ramps or special forklifts) as required by checklist item F-4a. Please either indicate where the language is included in the permit application or provide a revised permit application which includes this information.
6. The application does not contain language which demonstrates the mitigation of effects of equipment failure and power outage as required by checklist item F-4d. Please either indicate where the language is included in the permit application or provide a revised permit application which includes this information or language which states why the requirement does not apply to the facility.
7. The application does not contain language for the procedure to extend the closure period if necessary as required by checklist item I-1d(1)(a). Please either indicate where this language is included in the permit application or provide a revised application which includes this information.