



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
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June 18, 2013

### VIA ELECTRONIC MAIL

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

**Re: Radford Army Ammunition Plant, Radford, VA  
EPA ID No. VA1210020730, Approval of Class 2 Permit Modification  
Hazardous Waste Management Open Burning Ground (OB) Operating Permit**

Dear Mr. Stewart:

Enclosed are the final Class 2 Modifications to the Open Burning Grounds (OBG) Permit for hazardous waste treatment at the Radford Army Ammunition Plant (RAAP), Radford, Virginia ("Facility"). The final Class 2 Modifications to the Permit have been approved.

The Virginia Department of Environmental Quality (DEQ) received the Class 2 Permit modification request addressing the hazardous waste Open Burning Ground (OBG) that was communicated to the DEQ in two parts from the Facility. The first part is dated March 22, 2013, and was received March 27, 2013, and addressed only groundwater issues. The second part included an additional request regarding a proposed chromium feed rate increase under the 500-pound skid burn scenario, and it was received on April 3, 2013, by e-mail. RAAP, in their letter dated April 19, 2013, elected to discontinue pursuit of the chromium feed rate increase and continue only with the processing of the groundwater monitoring changes.

The DEQ determined that the proposed Class 2 modification request encompassing groundwater monitoring issues is a Class 2 modification in accordance with 40 CFR § 270.42 Appendix I.C.1.a – *Changes in the number, location, depth, or design of upgradient or downgradient wells of permitted ground-water monitoring system.*

According to the DEQ's records, the required permit fee in the amount of \$2,400 has been received and accompanied a letter to the DEQ dated March 22, 2013. Also, according to the Public Notice on file in the DEQ Central Files, the Public Comment Period ran from March 25,

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2013, until May 23, 2013, and the Public Meeting was held on April 23, 2013, all in accordance with the procedures of 40 CFR § 270.42(b). The notice of a Public Comment period and a Public Meeting was run in the Roanoke Times on March 24, 2013.

The DEQ received no comments expressing the opinion that the permit should be denied. Therefore, in accordance with 40 CFR § 124.15, the Director of the DEQ has made a final permit decision to issue the permit modifications, for the open burning ground treatment permit. The final permit modification documents are enclosed.

This final permit decision is based upon the supporting rationale provided in the enclosed "Comment Response Summary," dated June 18, 2013, for the Facility, which is in accordance with 40 CFR § 124.17. The "Comments Response Summary" specifies which provisions of the draft permit modifications, if any, have been changed in the final permit decision, and the reasons for the change. In addition, this document describes and responds to all significant comments on the draft permit modifications or the permit application in support of the Class 2 modifications that were raised during the public comment period.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date of service of this decision to initiate a legal appeal by filing a notice of appeal with:

David K. Paylor, Director  
Department of Environmental Quality  
629 East Main Street  
PO Box 1105  
Richmond VA 23218

In the event that this decision is served to you by mail, the date of service will be calculated as three days after the postmark date. Please refer to Part 2A of the Rules of the Supreme Court of Virginia, which describes the required content of the Notice of Appeal, including specifications of the Circuit Court to which the appeal is taken, and additional requirements concerning appeals from decisions of administrative agencies.

Revised electronic copy pages to the permit are enclosed and are to be inserted into your copy of the hazardous waste Permit.

If you should have any further questions regarding this matter please contact Russell McAvoy, Jr., PE, Environmental Engineer Senior, of my staff by phone at (804) 698-4194 or by e-mail at russell.mcavoy@deq.virginia.gov.

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Sincerely,



Leslie A. Romanchik  
Hazardous Waste Program Manager  
Office of Waste Permitting and Compliance

Attachments:

- Enclosure 1 – Final Modified Permit Pages for Radford Army Ammunition Plant,  
Radford, Virginia Facility
- Enclosure 2 – Comment Response Summary

# Enclosure 1

**Comment Response Summary  
Radford Army Ammunition Plant  
VA1210020730**

**June 18, 2013**

**RAAP: Class 2 Modification to the Hazardous Waste Open Burning Ground Permit  
Comments and Responses**

**COMMENT 1** - Reference April 10, 2013, written comment by Andrew Burns.

Question: I live at 130 Weddle Way in Christiansburg. I have great concerns about RAAP burning waste material, given the likely potential that my family and I will undoubtedly be exposed to the exhaust of that activity. I would like to voice my objection to allowing any additional burning of this type of material; however, I would prefer that none of this burning take place, given the nature of the material being disposed of. Please consider my opinion in making the decision to allow this to take place in my community.

**Response: In its letter dated April 19, 2013, the facility decided to withdraw its request for an increase in the chromium feed rate associated with the 500 pound skid burn. The chromium feed rate limits remain unchanged from the current permit.**

**COMMENT 2** – Reference April 19, 2013, written comment by Ruth Wilburn.

Question: I am very much against allowing RAAP to double their toxic chromium pollution and the changing of location of the water monitoring well. There are many families who live near there, this is a dangerous proposal and should not be allowed to happen. There is no good that can come from this. Ruth Wilburn, Christiansburg VA

**Response: In its letter dated April 19, 2013, the facility decided withdraw its request for an increase in the chromium feed rate associated with the 500-pound skid burn. The chromium feed rate limits remain unchanged from the current permit.**

**COMMENT 3** - Reference April 19, 2013, written comment by Jodi Sangster.

Question: I will not be able to attend the meeting on increasing the chromium allowed from the Radford army ammunition plant, but as a resident of Blacksburg I would like to express my disapproval for this change to their permit.

**Response: In its letter dated April 19, 2013, the facility decided to withdraw its request for an increase in the chromium feed rate associated with the 500-pound skid burn. The chromium feed rate limits remain unchanged from the current permit.**

**COMMENT 4** - Reference April 19, 2013, written comment by Valerie Orth.

Question: Please do not allow RAAP to increase levels of toxic Chromium released into the New River in Radford. I am a concerned citizen of the New River Valley and would like levels of toxic pollutants reduced in the river, not increased.

**Response: In its letter dated April 19, 2013, the facility decided to withdraw its request for an increase in the chromium feed rate associated with the 500-pound skid burn. The chromium feed rate limits remain unchanged from the current permit.**

**COMMENT 5** - Reference April 22, 2013, written comment by Leah Wolford.

Question: As an ecologist and instructor of biology I was quite alarmed at hearing that RAAP is moving to increase the volume of chromium burned in the Open Burning Grounds and concerned as to the reasons why water testing is to be moved to another site. Because of a class that I teach I will not be able to attend the meeting tomorrow (although I hear a number of my students may), but I would like to have access to the information which is disclosed at the meeting. Would it be possible for you to send me this information or a link to it?

**Response: In its letter dated April 19, 2013, the facility decided to withdraw its request for an increase in the chromium feed rate associated with the 500-pound skid burn. The chromium feed rate limits remain unchanged from the current permit.**

**COMMENT 6** - Reference May 13, 2013, May 15, 2013, May 20, 2013, and May 21, 2013 collective written comments by Blanche Adams, Meriel Russell, Johanna Jones, and Beverly Fleming respectively.

Question: **Overall:** We request that the Groundwater Protection Standard (GPS) for perchlorate in groundwater at the OBG be amended to 15ppb in compliance with the current standards set by U.S. Army regulations of 2009. The standard they are now using at RAAP is 26ppb.

**Response: Permit Attachments V.E and VII.C. were modified to reflect the change in the Risk-based Screening Level (RSL) and GPS for perchlorate from 26 ug/L (ppb) to 15 ug/L (ppb) as requested by the facility on May 28, 2013.**

Question: **Module IV:** We request that all monitoring wells currently in place continue to be used for the duration of this permit action and not be moved or substituted. Adding another well, however, makes good sense.

**Response: Removal of upgradient well 13MW-1 from the compliance network is acceptable due to the fact that monitoring well 13MW-2 will serve as the required upgradient monitoring point for the Open Burning Ground. Monitoring well 13MW-1 will be retained as a piezometer and used for groundwater elevation monitoring.**

Question: We request that the system of names and numbers for the wells **not** be changed, as this makes it more difficult for community members to understand and monitor information about them.

**Response: The modification request did not include renaming the wells; the numbering will remain the same.**

Question: **Module IV Attachment A:** If the Risk-based Screening Level (RSL) proposed does not meet or exceed the State's Water Quality Standards (WQS) for this stretch of the river, we request that the more stringent standard be applied.

**Response: The comment does not pertain to any of the proposed changes comprising the Class 2 modifications to the Open Burning Ground permit.**

Question: **Module V:** The modification request mentions updating ground water elevation data to current events. We request that the new flood plain boundaries also be considered. We have

experienced high water three times this year alone, and this could have a significant effect on the possible release of toxins into the New River from the Open Burning Grounds.

**Response: The comment does not pertain to any of the proposed changes being considered as part of the Class 2 modifications to the Open Burning Ground permit. However, the regulations require evaluation of whether the facility is in the 100-year floodplain. The evaluation was made during the initial permit application review process, and appropriate requirements were placed in the current permit to provide flood mitigation controls.**

**COMMENT 7** – Reference May 28, 2013 written comment by Jay Stewart.

Question: In November 2012, EPA Region III revised the RSL for perchlorate from 26 µg/l to 11 µg/l, but stated on the November 2012 RSL Table and associated Frequently Asked Questions (FAQ) that the EPA Interim Drinking Water Health Advisory concentration of 15 µg/l is recommended for use as the preliminary remediation goal (PRG) for perchlorate “*where there is an actual or potential drinking water exposure pathway.*” BAE systems requests that Permit Attachment VII.C. be modified to reflect the change in the RSL table for perchlorate to 15 ug/L.

**Response: Permit Attachments V.E. and VII.C. of the Open Burning Ground permit were modified to reflect the change in the RSL and GPS for perchlorate from 26 ug/L (ppb) to 15 µg/L (ppb) as requested by BAE Systems.**