

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

October 26, 2015

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

**Subject: Application for Renewal: RFAAP Open Burning Ground Permit
Transmittal of Multipathway Risk Assessment Protocol for Open Burning Ground RCRA Permit
Renewal Application
Radford Army Ammunition Plant, Radford, Virginia
EPA ID#: VA1210020730**

Dear Ms. Romanchik:

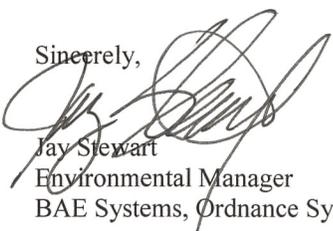
On August 14, 2014, the Virginia Department of Environmental Quality (DEQ) sent a Call-In Letter to the Radford Army Ammunition Plant (RFAAP) officially notifying the RFAAP of the due date for the open burning ground (OBG) Resource Conservation and Recovery Act (RCRA) renewal application and specifying DEQ expectations for this application. The original due date for this application was April 28, 2015. RFAAP requested a six-month extension to this due date for several reasons, including, but not limited to, several Omnibus requests included in the call-in letter and the overlap between this application and the notice of deficiency on the incinerator RCRA application. Instead of the requested six months, DEQ provided RFAAP a 60-day extension. Under this extension, the due date for the RCRA renewal application was extended until June 29, 2015.

RFAAP submitted all elements of the RCRA Part A and Part B application for the OBG as specified in Title 40 Code of Federal Regulations (CFR) Part 270 pursuant to the original call-in letter and the extended due date of June 29, 2015, on June 15, 2015. At that time, RFAAP requested an extension on the due date for the multipathway risk assessment (MPRA) protocol requested by DEQ under the RCRA Omnibus provision of Section 3005(c)(3). DEQ granted our request for extension, providing up until the permit expiration (October 27, 2015), for development and submittal of the MPRA protocol.

Pursuant to this extended deadline, the original call-in letter, and our subsequent correspondence with DEQ, RFAAP is providing the requested MPRA protocol at this time. Submittal of this protocol fulfills our obligations specified in DEQ's call-in letter and satisfies all requirements for renewal of the OBG permit application.

We look forward to working with DEQ to complete renewal of our RCRA permit application. If you have any questions or concerns regarding this submittal or our prior application materials, 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: J. McKenna
J. McKenna

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