



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward
Secretary of Natural Resources

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Director

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June 22, 2015

VIA ELECTRONIC MAIL

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

**Re: Acknowledgment of Receipt of the Part A and Part B Permit Applications for the RCRA Subpart X Open Burning and Open Detonation Permit and Extension Request for Human Health and Ecological Risk Assessment Protocol Submission Radford Army Ammunition Plant, Radford, VA
EPA ID No.VA1210020730**

Dear Mr. Stewart,

On June 15, 2015, the Department of Environmental Quality's (DEQ) Office of Waste Permitting and Compliance (OWPC) received your submittal of the Part A application and the proposed changes to the existing permit using a red line and strike out format, which is to serve as the Part B Permit Application.

The Virginia Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60-270, and 40 CFR Part 270 require this submittal. Review of this information will commence and you should receive DEQ's comments within 30 days.

In the transmittal letter the Radford Army Ammunition Plant (RAAP) also requested a 180 day extension for the submittal of the Open Burning Grounds (OBG) Risk Assessment Protocol that will address both human health and ecological risk in addition to the 60 day extension granted on February 4, 2015.

DEQ does understand RAAP's position regarding wanting to have the flyer emissions testing data from the OBG before submission of the Risk Assessment Protocol. Given these considerations the DEQ is granting a 120 day extension from the current submission deadline of June 29, 2015. The Risk Assessment Protocol (addressing both human health and ecological risk) should be submitted with placeholder language for the constituents to be evaluated and

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emission factors to be utilized. The new due date for the submission of the Risk Assessment Protocol is now on or before October 27, 2015. The extension is being granted with the understanding between DEQ and RAAP that the placeholder language will be revised, as appropriate, after evaluation of the data from the flyer emissions testing. This may be submitted in conjunction with a future response to a Notice of Deficiency (NOD) from the DEQ and does not need to be provided as a separate response. If you have any questions regarding the Risk Assessment Protocol, please contact the DEQ's Risk Assessor, Sonal Iyer at (804) 698-4259 or by email at Sonal.Iyer@deq.virginia.gov.

Additionally the DEQ has still not received the application fee of \$56,180 from RAAP as of this date. Please note that processing of the application and action on this permitting submission requires submittal of the fee.

If you have any questions concerning the information provided in this letter, please contact me at (804) 698-4129 or by email at Leslie.Romanchik@deq.virginia.gov.

Sincerely,



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

cc: Andrea Barbieri, EPA, Region III (3LC50)
Ashby Scott, DEQ, CO
Aziz Farahmand, DEQ, Blue Ridge Regional Office
Central Hazardous Waste Files