



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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Secretary of Natural Resources

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Director

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June 15, 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: Radford Army Ammunition Plant, Radford, VA  
EPA ID No. VA1210020730, Approval of Temporary Authorization to Store  
Hazardous Waste**

Dear Mr. Stewart:

The Virginia Department of Environmental Quality (DEQ) is in receipt of the Radford Army Ammunition Plant (RAAP), Radford, Virginia, facility's correspondence, dated June 3, 2015 and submitted June 8, 2015, requesting the 180-day temporary authorization to store hazardous waste in containers. In a letter dated May 15, 2015, the DEQ previously approved a 30-day extension to the 90-day clock for waste propellants generated on or before March 17, 2015.

RAAP is submitting a request for a temporary authorization in accordance with 40 CFR §270.42(e)(2)(i)(B). The request is for a Class 3 modification that meets the criteria of 40 CFR §270.42(e)(3)(ii)(D) – to enable the permittee to respond to changes in types or quantities of the waste managed under the facility permit. As required under 40 CFR §270.42(e)(2)(ii)(A-C), the temporary authorization request includes a description of the activities to be conducted under the temporary authorization, an explanation of why the temporary authorization is necessary, and sufficient information to demonstrate compliance with 40 CFR Part 264 standards.

Storage of hazardous waste for up to 180 days that is currently treated under the Open Burning Ground and Incineration permits would occur in Buildings 1917 and 1955. Subsequent to storage under the temporary authorization, the hazardous waste would be treated onsite or shipped offsite. After the 180 day period, the two buildings would revert to less than 90 day hazardous waste accumulation areas. These two buildings are currently less than 90 day

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accumulation areas for hazardous waste and meet the technical requirements for container storage under 40 CFR §264 Subpart I (264.170 - 179). In addition, 40 CFR §264 Subpart I (264.170 - 179) which includes containment is essentially the same as the 40 CFR §265 Subpart I (265.170 - 179) requirements that do not include containment and that apply to less than 90 day container accumulation areas. Based on the June 8, 2015, submittal, the DEQ has determined that the secondary containment systems within the two buildings meet the technical requirements of 40 CFR Subpart I (§264.175). In addition, the aisle space provided for the storage in the two buildings is adequate and compatibility of wastes types stored in close proximity is not an issue based on the June 8, 2015, submittal.

Therefore, the DEQ grants approval of the temporary authorization to store hazardous waste currently regulated under the Incineration and Open Burning treatment permits in Buildings 1917 and 1955 at the Radford Army Ammunition Plant, Radford, Virginia (EPA ID Number VA1210020730). This temporary authorization is in accordance with the requirements of the 40 CFR § 270.42(e), and is effective June 25, 2015. This temporary authorization shall have a term of 180 days. Please note, in accordance with 40 CFR § 270.42(e)(4), the temporary authorization may be reissued for an additional term of 180 days provided that RAAP has requested a Class 2 or Class 3 permit modification for the activity covered in the temporary authorization.

The DEQ understands that RAAP notified the facility mailing list of the submission of the request for a temporary authorization on June 10, 2015 – which is within 7 days of submission – in accordance with 40 CFR § 270.42 (e)(2)(3).

If you should have any further questions regarding this matter please contact Ashby Scott, Hazardous Waste Permit Writer, of my staff by phone at (804) 698-4467 or by e-mail at [Ashby.Scott@deq.virginia.gov](mailto:Ashby.Scott@deq.virginia.gov).

Sincerely,



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

cc: Andrea Barbieri, EPA Region III (3LC50)  
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Hazardous Waste Management File