

FACT SHEET

Radford Army Ammunition Plant

Overview

The Radford Army Ammunition Plant (RAAP) is subject to federal and state environmental statutes and regulations. As of September 2019, the Virginia Department of Environmental Quality (DEQ) has been considering issuing a Class 3 permit modification for the construction and operation of certain hazardous waste storage and treatment equipment.

Purpose and Scope of DEQ's General Regulatory Programs

Air Protection Programs

Under the Clean Air Act, air quality permits are issued to industries and facilities that emit regulated pollutants to ensure they do not harm public health or cause significant deterioration. DEQ administers the air permitting program in Virginia.

Land Protection Programs

Solid and hazardous wastes are regulated by DEQ, which is authorized to administer the programs created by the federal Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act and the Virginia Waste Management Act.

Water Protection Programs

Under the Clean Water Act, DEQ is authorized to administer the Virginia Pollutant Discharge Elimination System to limit pollutant discharges into streams, rivers and bays. A permit for all point source discharges to surface waters is required.

Underground Storage Tanks

DEQ implements the Underground Storage Tank program under the State Water Control Law. The regulations cover notification, operation, maintenance, recordkeeping, reporting and correction actions.

State Monitoring Programs

The State Water Control Law mandates the protection of existing high-quality waters and provides for the restoration of all other waters for reasonable public uses and to support aquatic life. DEQ operates several water monitoring programs to help develop water quality standards to accomplish this goal.

Public Participation

DEQ follows public participation requirements and guidelines for the agency's regulatory and program implementation decisions. DEQ publishes notices for regulatory actions, permit actions, policy development and other actions.

What is the current regulatory action being considered at RAAP?

DEQ is considering issuing a permit for the construction and operation of certain hazardous waste storage and treatment equipment. A modification of the permit is required before the RAAP facility can construct and operate the new units.

The permit outlines operating conditions for the following:

- The Grinder Building, where wastes will be transported before treatment, ground into small pieces prior to being mixed with water into a slurry and then incinerated in the rotary kiln incinerators. The structure houses the permitted hazardous waste storage and grinder tanks. It also includes a separation system that can be used to prepare the wastes for offsite shipment if necessary.
- Rotary Kiln Incinerators, where the slurried wastes will be thermally treated in accordance with requirements.
- The Contained Burn Chamber (CBC), where hazardous wastes that cannot be slurried will be thermally treated.
- The CBC and Car Bottom Storage/Loading Building, where hazardous wastes will be brought prior to treatment and configured into batches for treatment in the CBC. It is also the location where metal items targeted for decontamination will be loaded onto carts for the Car Bottom Oven.

What was the most recent permit action related to the RAAP?

A Class 3 modification to the current explosive waste incinerator permit is being considered to allow for a new incinerator complex to be built to replace the current rotary kiln incinerator units. Additionally, both the permits for the current Explosive Waste Incinerators and Open Burning Ground are being renewed. Human health and ecological risk assessments are being developed, the results of which will be used to identify any additional permit limits.

ACTIVITY	UNIT	MECHANISM	LEAD AGENCY/PROGRAM	STATUTE/REGULATIION
Storage and incineration of waste propellants	Incinerator	· Title V Permit 20656 · RCRA Permit	DEQ Air Permitting DEQ Waste Permitting	CAA and Hazardous Waste Combustor MACT RCRA , 40 Code of Federal Regulations (CFR) 260-270 and 9 VAC 20-60 et. seq.
Open burning of waste propellants	Open Burning Ground (OBG) (HWMU 13)	RCRA Permit	DEQ Waste Permitting	RCRA, 40 CFR 260-270 (including Part 264 subpart X)
Inactive waste disposal sites (post-closure care)	Post-closure care of HWMUs 5, 7, 10 and 16	RCRA Permit	DEQ Waste Permitting	RCRA 40 CFR 260-270
Investigation and remediation at historical land- based units	Historical solid waste management units	HSWA Corrective Action Permit	DEQ Waste	Hazardous and Solid Waste Act (HSWA) - Corrective Action Section 3004(u)
Active CDD (Construction Demolition and Debris) landfill Closed industrial and sanitary landfills	Solid waste landfills	· SWP 433 (CDD) · SWP 353 (ILF) · SWP 401 (SLF)	DEQ Solid Waste Permitting	Virginia Solid Waste Management Act 9 VAC 20-81 et. seq.
Petroleum storage	Five (5) underground storage tanks (UST) Nine (9) Aboveground storage tanks (AST)	· Notification and registration; · Self-implementing requirements; · SPCC plan; and · ODCP	DEQ Petroleum Program	USTs : RCRA Subtitle I, Virginia Water Control Law , 9 VAC 25-580 et. seq. ASTs : CWA, 40 CFR 112, 9 VAC 25-91 et. seq.
Process wastewater/stormwater discharges	18 Outfalls	VPDES Permit VA0000248	DEQ Water Permitting	CWA Section 402 Virginia Water Control Law
Air emissions	Powerhouse, boiler, acid and acid recovery, solvent recovery, fabric filters wastewater treatment processes, and others (see permit)	· Registration · Title V Permit 20656 · New Source Review (NSR) Permits	DEQ Air Permitting Department of Labor & Industry (Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP))	Clean Air Act (CAA) Maximum Achievable Control Technology Standards (MACTs): Military, Boiler, Commercial and Industrial Solid Waste Incineration Asbestos NESHAP
STATE WATER PROGRAMS				
Watershed monitoring	Ambient Water Quality	Monitoring across the state	DEQ Water Quality Monitoring Program	CWA Sections 303 and 305 VA Water Quality Monitoring Info and Restoration Act Virginia Code Article 1, Section 62.1-44.19:5
Statistical surveys	Probabilistic Monitoring	Monitoring at randomly selected sites	DEQ Water Quality Monitoring Program	CWA Sections 303 and 305 Virginia Code Article 1, Section 62.1-44.19:5
Targeted development on impaired water segments	TMDL Development	Impaired waters including the New River	DEQ Water Quality Monitoring Program	CWA Section 303 and 305
Periodic monitoring for PCBs	Fish Tissue/Sediment Monitoring	May include the New River when funding available	DEQ Fish Tissue and Sediment Contaminants Monitoring Program	CWA 106 Grant, CWA 303 and 305 VA Water Quality Monitoring Info and Restoration Act Virginia Code Article 1, Section 62.1-44.19:5