



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
1-800-592-5482

August 14, 2014

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: Renewal Application for Reissuance of Facility's Open Burning and Open Detonation Permit
Radford Army Ammunition Plant, Radford, VA
EPA ID No. VA1210020730

Dear Mr. Stewart:

On October 28, 2005, the Department of Environmental Quality (DEQ) issued a Permit for the Thermal Treatment of Hazardous Waste by Open Burning and Open Detonation (OB/OD Permit) to the, Radford Army Ammunition Plant, Radford, VA under EPA ID No. VA1210020730. The OB/OD Permit became effective on October 28, 2005, and will expire on October 28, 2015.

In accordance with the Virginia Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60-270, and as incorporated by reference, under 40 CFR Part 270, §270.10(h), *Any hazardous waste management (HWM) facility with an effective permit shall submit a new application at least 180 days before the expiration date of the effective permit, unless permission for a later date has been granted by the Director. (The Director shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)*

Therefore, the DEQ is requesting that the Radford Army Ammunition Plant submit the Part A and Part B of the RCRA Hazardous Waste Permit Application (Application) no later than April 28, 2015, unless the Radford Army Ammunition Plant requests permission from the Director to submit the application at a later date. Please remember that the application cannot be submitted later than the expiration date of the existing Permit. Please submit the Application to this Office in the form of two hard copies, a CD in PDF format and a CD in Microsoft WORD format, and submit the Application to the EPA, Region III and the DEQ's Blue Ridge Regional

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Office in the CD PDF format. Please be advised that the DEQ requires all sections of the Application to be in an electronic format, including drawings. The DEQ does not have the capability to copy large drawings, i.e., anything over 11 inches by 17 inches. Paper copying is required to Public Notice the draft permit when it is distributed to those who don't have e-mail access and upon final renewal of the permit.

As per 40 CFR 270.23, which is incorporated by reference in 9 VAC 20-60-270, the Application should include a detailed technical assessment which justifies the continued use of OB/OD as a treatment method for hazardous waste in comparison to the alternative treatment methods currently available. For your reference the US Army Corp of Engineers, Construction Engineering Research Laboratories "*Alternatives to Open Burning/Open Detonation of Energetic Materials*" document, dated August 1998, has been attached.

As part of the renewal Application for the OB/OD Permit a revised risk assessment for the permitted OB/OD operations at the facility must be submitted. The revised risk assessment should incorporate all of the necessary revisions outlined in the "*Hazardous Waste, Part B, Combustion Facility, RCRA, Permit Renewals – Requirements for Revised Risk Assessments*" document, dated February 2014, which is attached.

Please submit a check or money order payable to the "Treasurer of Virginia." for the permit application fee of \$56,180 required under 9VAC 20-60-1285. Permit processing by this Office is not authorized unless the fee has been received.

Please include with the check or money order a copy of the letter transmitting the permit application submittal to the DEQ. The permit application payment should be mailed to the following address:

Department of Environmental Quality
Receipts Control
P. O. Box 1104
Richmond, Virginia 23218

Please submit the permit application, along with a copy of the check or money order, to the attention of Mr. Ashby R. Scott, Title V Program Coordinator, Office of Waste Permitting and Compliance, at 629 East Main St., Richmond, Virginia, 23219, or at P.O. Box 1105, Richmond, Virginia, 23218.

If you have any questions concerning this letter or would like to arrange for a pre-application meeting, please contact me at (804) 698-4467 or by email at Ashby.Scott@deq.virginia.gov.

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Environmental Manager
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Sincerely,



Ashby R. Scott
Title V Program Coordinator
Office of Waste Permitting and Compliance

Attachments:

**Alternatives to Open Burning/Open Detonation of Energetic Materials
Hazardous Waste, Part B, Combustion Facility, RCRA, Permit Renewals – Requirements
for Revised Risk Assessments**

cc: Central Hazardous Waste File, DEQ
Andrea Barbieri, EPA Region III (3LC50)
Aziz Farahmand, DEQ, BRRO
Leslie Romanchik, Russ McAvoy, Jutta Schneider, Kurt Kochan, DEQ, CO

Jim McKenna, Radford Army Ammunition Plant