



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

April 1, 2011

CERTIFIED MAIL – 7009 0080 0000 1925 7453
RETURN RECEIPT REQUESTED

Mr. David R. Zoghby
Senior Director of Marketing and
Commercial Contracts
EBV Explosives Environmental Company
dba General Dynamics Ordnance and
Tactical Systems – Munition Services
P.O. Box 1386
Joplin, MO 64802

RE: Class 1 Permit Modification with Prior Director's Approval
EBV Explosives Environmental Company, Joplin, Missouri
EPA ID# MOD985798164

Dear Mr. Zoghby:

The Missouri Department of Natural Resources (Department) approves EBV Explosives Environmental Company's Class 1 Permit Modification request, dated March 21, 2011. The request was for the evaluation of up to four alternate hydrogen chloride (HCl) sorbents for the Building #3 air pollution control system (APCS). This modification is needed due to the lower than expected neutralization efficiency of the soda ash sorbent currently being used.

This modification approval is to test up to four of the following sorbents at either the current injection point at the bottom of the spray dryer or into a duct further upstream of the spray dryer that may allow for longer reaction time:

- Trona (sodium sesquicarbonate, $\text{Na}_2\text{CO}_3 \cdot \text{NaHCO}_3 \cdot 2\text{H}_2\text{O}$);
- Sodium bicarbonate (NaHCO_3) at 99 percent purity;
- Nacholite (sodium bicarbonate (NaHCO_3) at 70 percent purity); and
- Calcium-based hydrated lime ($\text{Ca}(\text{OH})_2$).

EBV Explosives Environmental Company shall follow the process outlined in the March 21, 2011, submittal for evaluating the alternate absorbents. Upon conclusion of the testing of the four sorbent



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materials, EBV Explosives Environmental Company shall select the best candidate sorbent and continue to evaluate that sorbent for an extended period of time. Stack sampling for HCl and particulate matter shall be conducted as part of the evaluation process. **Total evaluation time with the alternate sorbents shall be limited to less than 720 hours over a six- to eight-week period.**

Upon completion of this testing period, EBV Explosives Environmental Company shall provide the results of the evaluation to the Department within 30 days of completing the testing. Additionally, EBV Explosives Environmental Company shall submit an additional permit modification requesting to permanently change the sorbent if the evaluation results indicate that an alternate sorbent would be more appropriate.

EBV Explosives Environmental Company must send a notice of the modification to everyone on their facility mailing list and the appropriate units of state and local government within 90 calendar days after the date of this letter, as outlined in Code of Federal Regulations 40 CFR 270.42(a)(1)(ii), incorporated by reference in Code of State Regulations 10 CSR 25-7.270(1). EBV Explosives Environmental Company must send a copy of the notice to the Department.

If you need assistance or have questions regarding this letter, please contact Mr. Richard Hock, Environmental Engineer, of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, by telephone at (573) 751-3553 or 1-800-361-4827, or by e-mail at richard.hock@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

Richard A. Nussbaum, P.E., R.G.
Chief, Permits Section

RAN:rhs

c: Ms. Nicole Eby, Air Pollution Control Program, Missouri Department of Natural Resources
Kenneth Herstowski, P.E., Project Manager, U.S. EPA Region VII
Southwest Regional Office, Missouri Department of Natural Resources