



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

May 19, 2011

CERTIFIED MAIL – 7009 3410 0001 9259 0185
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 April 25, 2011, without changes. The request was to change sorbent material from soda ash to sodium bicarbonate for ongoing production in the Building #3 Air Pollution Control System. The decision to change from soda ash to sodium bicarbonate is based on the Class 1 modification approval letter dated April 1, 2011, which allowed EBV Explosives Environmental Company to evaluate up to four alternate hydrogen chloride (HCl) sorbents for the Building #3 Air Pollution Control System.

EBV Explosives Environmental Company shall continue to test, up to a total of 720 hours, the three alternate sorbents specified in the April 1, 2011, Class 1 modification approval letter. Additional testing is still needed to determine the optimal sorbent material and feed conditions.

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.



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Mr. David R. Zoghby
May 19, 2011
Page 2

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 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 7
Southwest Regional Office, Missouri Department of Natural Resources