



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

September 30, 2015

CERTIFIED MAIL – 7009 0960 0000 8848 7246
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: Approval of Class 1 Permit Modification with Prior Director's Approval
Trail Basis Change in Sorbent used in Building #3 Air Pollution Control System
EBV Explosives Environmental Company, Joplin, Missouri
EPA ID# MOD985798164

Dear Mr. Zoghby:

The Missouri Department of Natural Resources (Department) hereby approves EBV Environmental Company's (EBV) dba General Dynamics Ordnance and Tactical Systems Munition Services Class 1 Permit Modification request, dated April 28, 2015. The request was to evaluate on a temporary basis using sodium sesquicarbonate (Trona) and/or calcium hydroxide (Hydrated Lime) in the Building #3 Air Pollution Control System (APCS) instead of the currently permitted sodium bicarbonate. This evaluation of these new sorbent material(s) is needed in order to attempt to reduce both the amount of sorbent used and the amount of ash generated from Building #3. The use of Trona or Hydrated Lime is expected to improve hydrogen chloride neutralization and thereby result in a decreased sorbent feed rate.

The Department agrees with EBV that this is a Class 1 Permit Modification requiring prior director approval, according to Code of State Regulations 10 CSR 25-7.270(1), which incorporates Code of Federal Regulations 40 CFR 270.42, Appendix I, L.7.c. We are approving the Class 1 Permit Modification request with the following conditions:

1. Testing of the Trona and Hydrated Lime in the Building #3 APCS shall not exceed a total of 360 hours over 3 to 4 week period.

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2. Documentation of start times, stop times, and total hours of the evaluation of both the Trona and Hydrated Lime in the Building #3 APCS shall be entered into the operating record and shall be provided to Department personnel upon request.
3. EBV shall prepare a report on the evaluation of using Trona and/or Hydrated Lime in the Building #3 APCS and submit the report to the Department within 90 days after completing the activities.
4. If EBV determines that the additional time is necessary for the trial period, the number of requested hours, or date for the submittal of the report, EBV shall request an extension of the time at least 7 calendar days before the expected deadline.
5. If the sorbent to be used in the Building #3 APCS is to be changed to Trona or Hydrated Lime on a permanent basis, EBV shall submit an additional permit modification to the Department for approval.
6. EBV 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, according to 10 CSR 25-7.270(1), which incorporates 40 CFR 270.42(a)(1)(ii). EBV must send a copy of the notice to the Department.

If you have questions regarding this letter, please contact Mr. Radu Mariuta, Project Manager, 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 radu.mariuta@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:rmm

c: Kenneth Herstowski, P.E., Project Manager, U.S. EPA Region 7
Southwest Regional Office, Missouri Department of Natural Resources