



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

June 5, 2012

CERTIFIED MAIL – 7009 2820 0000 7543 5691
RETURN RECEIPT REQUESTED

Ms. Julia A. Casey
Senior Manager
Environmental Engineering
ATK Armament Systems
Small Caliber Systems
P.O. Box 1000
Independence, MO 64051-1000

RE: Class 1 Permit Modifications
Lake City Army Ammunition Plant, Independence, Missouri
EPA ID# MO4213820489

Dear Ms. Casey:

The Missouri Department of Natural Resources (Department) approves Lake City Army Ammunition Plant's Class 1 Permit Modification request, dated March 8, 2012, without changes. The request, dated March 8, 2012, contained several permit modification requests, with and without prior approval. The modification requests are summarized below:

Prior Director Approval

- Modify existing Post-Closure Care Plan and inspection logs to change current requirement to cut grass at the height of 12" to mowing periodically on an as-needed basis.
- Update inspection logs in Part B, Special Permit Conditions, Section F, Attachments F-2 through F-7, to provide more accurate direction on inspection form submittal.
- Make a minor adjustment to the Closure Safety Plan consisting of changing the required inspection frequency from weekly to semiannually and updating the inspection logs to reflect that change.

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Without Director Approval

- Remove redundant equipment and material from the Permit Renewal Application Contingency Plan.
- Update Internal Alarms and Communication Systems to reflect use of 7911 for all emergency response.

In addition, the Department also recognizes Lake City Army Ammunition Plant's Class 1 Permit Modification notices, dated May 2, 2011 and April 9, 2012. The notifications were to:

- Change the Operator Information from Alliant Techsystems, Incorporated, to Alliant Techsystems Operations, LLC.
- Change Addresses for members of the Explosive Spill Response Team.
- Update the Vice President and General Manager information for Alliant Techsystems Operations, LLC.

The Department agrees with Lake City Army Ammunition Plant that these are Class 1 Permit Modifications not requiring prior director approval.

Lake City Army Ammunition Plant 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 or within 90 days after the change was made, 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). Lake City Army Ammunition Plant must send a copy of the notice(s) to the Department.

If you have questions regarding this letter, please contact Mr. Nathan Graessle, 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 nathan.graessle@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:ngm

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- c: Ms. Sara Clark-Kennedy, Remedial Project Manager and Environmental Coordinator,
Lake City Army Ammunition Plant
Ken Herstowski, P.E., Project Manager, U.S. EPA Region 7
Mr. Wray Rohrman, Project Manager, U.S. EPA Region 7
Kansas City Regional Office, Missouri Department of Natural Resources