



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

June 17, 2015

CERTIFIED MAIL – 7009 0960 0000 8848 6973
RETURN RECEIPT REQUESTED

Mr. Brian Dudgeon
Senior Manager
Safety, Security, and Environmental
Engineering
Alliant Techsystems Operations, LLC
P.O. Box 1000
Independence, MO 64051-1000

RE: Approval of Class 1 Permit Modification with Prior Director's Approval
Storage of Military Munitions in Permitted Hazardous Waste Storage Bunkers
Lake City Army Ammunition Plant, Independence, Missouri
EPA ID# MO4213820489

Dear Mr. Dudgeon:

The Missouri Department of Natural Resources (Department) has reviewed Lake City Army Ammunition Plant's (LCAAP) Class 1 Permit Modification request, dated May 20, 2015, with conditions. The modification request was to allow storage of military munitions in permitted hazardous waste storage bunkers 130D, 130E, and 130F. The military munitions proposed to be stored in these bunkers are not considered hazardous waste in accordance with 10 CSR 25-7.266(2)(M) incorporating 40 CFR Part 266 Subpart M.

The Department agrees with LCAAP 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(d)(2)(i) and 40 CFR 270.42, Appendix I, F.4.a. We are approving the LCAAP's Class 1 Permit Modification request with the following conditions:

1. The total amount of materials stored in bunkers 130D, 130E, and 130F shall not exceed a total of 100,000 pounds of explosive materials stored in each bunker. All of the materials being stored in bunkers 130D, 130E, and 130F, including any military munitions, shall be included in the calculation toward determining compliance with these 100,000 pounds of explosive materials restrictions.



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2. Only compatible munitions and hazardous wastes shall be stored together in the same bunker at the same time. All munitions must be clearly labeled as being either hazardous waste or military munitions and each type of material shall be stored separately in compliance with applicable federal, state, and local regulations.
3. LCAAP shall comply with all relevant portions of 10 CSR 25-7.266(2)(M) which incorporate 10 CFR Part 266 Subpart M.

LCAAP 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) and 10 CSR 25-7.270(2)(A)6, which incorporates and modifies 40 CFR 270.42(a)(1)(ii). LCAAP must send a copy of the notice to the Department.

If you have questions regarding this letter, please contact Mr. Cedric Cunigan, 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 cedric.cunigan@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:ccm

c: Mary Grisolano, P.E., Project Manager, U.S. EPA Region 7
Kansas City Regional Office, Missouri Department of Natural Resources