



February 8, 2010

CERTIFIED MAIL – 7004 1160 0000 8177 3360
RETURN RECEIPT REQUESTED

Mr. David R. Zoghby
Vice President and Business
Director
EBV Explosives Environmental
Company
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:

This letter is to notify you that the Missouri Department of Natural Resources (Department) reviewed EBV Explosives Environmental Company's (EBVEEC) Class 1 Permit Modification request, dated December 15, 2009. The request was for the removal of the Cyclones from Building #3 Air Pollution Control System. The planned use for the Cyclones was to be used between the Thermal Treatment Unit and the Thermal Expansion Chamber (TEC) to remove aluminum oxide generated from the burning of the propellant. It has been determined that the aluminum oxide is so light that it carries through the Cyclones and through the TEC and into the Spray Dryer and Baghouse where it is removed. It has been determined that no particulates are showing up in the Cyclone discharge and the TEC has been inspected and found that only a small amount of buildup of solids in the bottom. By removing the Cyclones, EBVEEC will reduce the pressure drop through the system and can reduce the energy consumption of the ID Fan. Additionally, references to the Cyclones in the permit application have been removed.

The Department disagrees with EBVEEC that this is a Class 1 Permit Modification not requiring prior director approval. Instead, the Department has determined this modification to be a Class 1 Permit Modification requiring prior director approval. We are approving the modification request.

EBVEEC must send a notice of the modification to everyone on their facility mailing list and the

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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). EBVEEC must send a copy of the notice to the Department.

If you have any 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:rhm

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