



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

March 29, 2012

CERTIFIED MAIL – 7009 2820 0000 7543 5509
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 (EBVEEC) Class 1 Permit Modification request, dated March 14, 2012. The request was to change sorbent material from sodium bicarbonate to sodium sesquicarbonate (Trona) for the Building #3 air pollution control system, on a trial basis. You have indicated that this re-evaluation of the effectiveness of Trona is needed due to the higher temperatures being experienced at the sorbent injection point of the new air pollution control system. The use of Trona is expected to improve hydrogen chloride (HCL) neutralization efficiency and result in a decrease in sorbent feedrate.

Total Trona evaluation time shall not exceed 360 hours over a 3- to 4-week period. Documentation of the Trona evaluation time shall be entered into the operating record, and such documentation shall be provided to Department personnel upon request. EBVEEC shall submit an additional permit modification request if you elect to permanently change the sorbent to Trona. The Department is currently in the process of reviewing a comprehensive performance test plan for the Building #3 propellant thermal treatment units. The choice of sorbent needs to be established prior to any comprehensive performance testing.

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

If you need assistance or have questions regarding this letter, please contact Steve Jaques, P.E., 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 steve.jaques@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:sjm

c: Ms. Darcy Bybee, 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