



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

April 18, 2012

CERTIFIED MAIL – 7009 2820 0000 7543 5547
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 July 22, 2011, (and supplemented by your e-mails dated March 9, 2012, March 12, 2012, April 5, 2012, and April 12, 2012). The request was to remove the activated carbon filter on each of the thermal treatment unit air pollution control systems at Building #1.

We are approving the Class 1 Permit Modification requiring prior director approval with the following conditions:

1. EBVEEC shall revise the Building #1 Comprehensive Performance Test Plan, as appropriate, to reflect the removal of the activated carbon filters. The revisions shall include: a) a revised process description, b) revisions to text and tables regarding instrumentation and control, c) addition of stack sampling and analysis for volatile organic compounds, and d) elimination of TO-15 sampling upstream of the activated carbon filter.
2. EBVEEC shall provide, as part of the Building #1 performance test report, a comparison of the hourly emission rates for any volatile or semi-volatile organic compounds detected during the Building #1 performance test to the screening model action level (SMAL) divided by 4.38 (see listing of SMALs at <http://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>). If hourly emission rates are below the SMAL divided by 4.38 for each of the detected compounds, then the Department will allow final removal of the activated carbon filter. If any emission rate is over the applicable SMAL divided by 4.38, then EBVEEC shall provide air dispersion modeling to the Department within 60 days of submittal of the Building #1

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performance test report. The Department shall review the air dispersion modeling to determine if the activated carbon filters can be removed. This comparison and modeling work is in addition to the permit requirement for completion of sitewide Human Health Risk Assessment in Section V. of the Schedule of Construction and Compliance.

3. The Department may require reinstallation of the activated carbon filters if the air dispersion modeling reveals any potential problems. EBVEEC shall remove the activated carbon and decontaminate the activated carbon equipment and keep the equipment in place until the Department has reviewed the report required by Condition 2., above.
4. If upon evaluation of the report required by Condition 2. above, the Department determines that reinstallation of the activated carbon filters is not necessary; the Department will direct EBVEEC to complete partial closure activities for the activated carbon filter equipment in accordance with EBVEEC's Disposal and Decontamination Plan (submitted by e-mail on April 12, 2012). EBVEEC shall initiate final closure activities for the activated carbon filter equipment within 60 days of receiving the Department's directive. A final closure report shall be submitted to the Department within 60 days of completion of closure activities in accordance with 40 CFR Part 264 Subpart G incorporated by reference in 10 CSR 25-7.264(2)(G).

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