



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

February 20, 2018

CERTIFIED MAIL – 7014 1200 0000 4389 3765
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: Approval of Class 1 Permit Modification with Prior Director's Approval for
To Allow Usage of Calcium Hydroxide in Building #3 Air Pollution Control System
EBV Explosives Environmental Company, Joplin, Missouri
EPA ID# MOD985798164

Dear Mr. Zoghby:

The Missouri Department of Natural Resources (Department) hereby approves EBV Explosives Environmental Company's Class 1 Permit Modification request, dated January 31, 2018, with conditions and a conditional schedule of compliance. The modification request was to add and remove equipment from the Building #3 Air Pollution Control System (APSC) to allow calcium hydroxide (hydrated lime) to be used as a sorbent for neutralizing hydrogen chloride gases instead of sodium bicarbonate.

The Department agrees with EBV Explosives Environmental Company (EBV) that this is a Class 1 Permit Modification request requiring prior Director approval, according to Code of State Regulations 10 CSR 25-7.270(1), incorporating Code of Federal Regulations 40 CFR 270.42, Appendix I, A.3. Our decision to approve the permit modification request is based on a thorough technical review of the modification request and applicable federal and state laws and regulations. We are approving the permit modification request with the following conditions and schedule of compliance items:

1. EBV shall notify the Department, in writing, when the installation of the new equipment is complete and the feeding of calcium hydroxide is set to begin.



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2. Within 30 calendar days of starting to feed calcium hydroxide to Building #3 APSC, EBV shall submit a plan to perform a new comprehensive performance test (CPT) for the APSC at Building #3 to verify EBV will be in compliance with the permit conditions and emissions limits established in EBV's Missouri Hazardous Waste Management (MHWMF) Part I Permit modified on January 11, 2018.
3. Within 90 calendar days of completing the CPT, EBV shall submit a report with the results of the CPT to the Department for review and approval.
4. If EBV determines additional time is necessary to prepare the testing plan or the CPT report, EBV must submit a written extension request, including justification for the extension request, at least 15 calendar days before the revised submittal date.
5. During the CPT, all permit conditions and emissions limits established in EBV's MHWMF Part I Permit shall be followed.

EBV must send a notice of the approved Class 1 Permit 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 required by 10 CSR 25-7.270(1), incorporating 40 CFR 270.42(a)(1)(ii). EBV must send a copy of the notice to the Department.

This permit modification may include conditions you are not familiar with or are different from or in addition to the conditions of your current permit. We would be pleased to meet with you to discuss any questions you may have related to the permit modification conditions. An appointment can be set up by contacting Mr. Radu Mariuta, Project 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 e-radu.mariuta@dnr.mo.gov. Any follow-up in response to your meeting request, whether by telephone, in-person meeting, or on-site visit, is considered Compliance Assistance and will focus on explaining the permit modification conditions to you. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

Richard A. Nussbaum, P.E., R.G.
Chief, Permits Section

RAN:rm

- c: Mike Dandurand, P.E., Missouri State Coordinator, U.S. EPA Region 7)
Southwest Regional Office, (Via Exchange Drive)
Heidi Rice, HWP-Permits Section (Via E-mail)