



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

March 13, 2018

CERTIFIED MAIL – 7014 1200 0000 4388 7580

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
To Allow Usage of Sodium Carbonate in Building #12 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 (EBV) Class 1 Permit Modification request, dated February 20, 2018. The modification request was to allow the usage of an alternate sorbent solution used to adjust the pH of the water in the wet scrubber in Building #12, from sodium hydroxide to sodium carbonate. You indicated this is needed due to the sodium carbonate being a safer material to handle, with less risk of chemical burns compared to the sodium hydroxide. The facility is already using sodium carbonate as a sorbent in the air pollution control system (APSC) for the incinerator and has experience with handling the material.

The Department agrees with 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.1 and 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.

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



David R. Zoghby
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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.

If you have questions regarding this letter, please contact Mr. Bill Fanska, 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 bill.fanska@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:rm

c: Mr. Don Lininger, CHMM, Chief, Waste Remediation & Permitting, EPA Region 7
Southwest Regional Office, (Via Exchange Drive)
Heidi Rice, HWP-Permits Section (Via E-mail)