

NOTICE OF INTENT TO ISSUE A HAZARDOUS WASTE MANAGEMENT PERMIT

The Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management (DSWM) proposes to issue a hazardous waste treatment permit to the United State Army, owner, and BAE Ordnance Systems Inc., operator, for Holston Army Ammunition Plant (HSAAP). This would allow the continued operation of the existing open burning hazardous waste facility.

The facility, HSAAP, with EPA ID Number: TN5 21 002 0421, is located at 4509 West Stone Drive in Kingsport, Tennessee 37660, currently has the authorization under interim status to treat hazardous wastes by open burning in four burn pan units. HSAAP obtained interim status for this hazardous waste treatment operation when it filed the Part A application for a hazardous waste permit on submitted in 1980 and the original Part B in December 1984.

HSAAP has been operating the Open Burn Treatment Units since 1977. On July 2, 2002 the DSWM received revised part B of the permit application for the open burn units. As a requirement of this permit a protocol for the air dispersion modeling analysis was submitted to DSWM. A groundwater monitoring waiver has been granted to the open burning treatment unit area. After several reviews and updates the DSWM has drafted a permit for the continued treatment of hazardous waste by open burning in the burn pan units.

The proposed permit, if issued, would allow the facility to continue treatment of 5,000 pounds of Net Explosive Weight (NEW) per day in four (4) Burn Pans. Each pan can be loaded to a maximum of 1,500 pounds of NEW. Based on a treatment schedule of 5 days per week, 50 weeks per year, HSAAP can treat a total of 1,250,000 pounds annually. Only certain explosive hazardous wastes are allowed to be treated at the Burn Pan Units.

The conditions for continued corrective action of solid waste management units (SWMUs) and areas of concern (AOCs) at the facility are addressed in Corrective Action Order No. 03HCA002 which was reissued for HSAAP on April 16, 2003. The Corrective Action Order details the procedures and schedule that HSAAP must follow for reporting the discovery of newly identified SWMUs and AOCs and newly discovered release from existing SWMUs or AOCs. Further corrective action for newly identified SWMUs, AOCs or releases shall follow the procedures as described in the Order. Holston will also be required to notify of imminent hazards, and as applicable, comply with the requirements developed under land disposal restrictions and organic air emission standards.

The permit is proposed to be issued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101 et seq., and Rule Chapter 1200-01-11, Hazardous Waste Management. A draft permit has been prepared based on DSWM's review of the application, and is available for public review and comment for a period of at least 45 days as required by Rule 1200-01-11-.07(7)(e)2(i). During this period a public hearing may also be requested under Rule 1200-01-11-.07(7)(f). A fact sheet summarizing the facility has also been prepared and is available for public review.

Copies of the permit application, the draft permit, air dispersion modeling protocol and risk assessment, corrective action order, fact sheet and public notice are available for public inspection at the Church Hill Branch Library, 412 East Main Blvd., Church Hill, Tennessee (423-357-4591), and Kingsport Public Library, 400 Broad Street, Kingsport, Tennessee 37600 (423-229-9489). These materials are also available for public inspection during normal business

hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Johnson City Field Office Division of Solid Waste Management located at 2305 Silverdale Road, Johnson City, Tennessee 37601 423-854-5400.

Any interested person may submit written comments on DSWM's proposal or request a public hearing by contacting: Mr. Malek Faradji; Corrective Action Section, Division of Solid Waste Management; TDEC; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-0822; or e-mail to malek.faradji@tn.gov. The comments or request for a public hearing must be received by 4:30 p.m., November 3, 2010, to assure consideration. A request for a hearing shall be in writing, including the contact information of requestor, and shall state the nature of the issues to be raised at the hearing. After considering all public comments received, the DSWM Director will issue a final permit decision and a Response to Comments.

TDEC is committed to the principles of equal opportunity, equal access, and affirmative action. Contact the EEO/AA Coordinator at 1-888-867-2757 or the ADA Coordinator at 1-866-233-5827 for further information. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

Persons who wish to be on DSWM's mailing list should request a Mailing List Request form by calling or writing: Public Participation Officer; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-0798; or e-mail Solid.Waste@tn.gov.

NOTICE ISSUED: September 20, 2010

FACT SHEET

INTENT TO ISSUE A HAZARDOUS WASTE MANAGEMENT PERMIT

FACILITY NAME: Holston Army Ammunition Plant

LOCATION: 4509 West Stone Drive
Hawkins County
Kingsport, TN 37660-9982

EPA ID No.: TN5 21 002 0421

FACILITY OWNER: United States Army
4509 West Stone Drive
Kingsport, TN 37660-9982

FACILITY OPERATOR: BAE Systems Ordnance Systems Inc.
4509 West Stone Drive
Kingsport, TN 37660-9982

FACILITY CONTACT: Mr. Bob Winstead
Environmental Manager
Holston Army Ammunition Plant
4509 West Stone Drive
Kingsport, TN 37660-9982
Phone: (423) 578-6253

UNITS: Open Burn (OB) Treatment Units

COMMENT PERIOD: Begins: September 20, 2010
Ends: November 3, 2010

FACILITY DESCRIPTION

The Holston Army Ammunition Plant (HSAAP) is a government-owned, and contractor operated. The facility is surrounded by rural and suburban areas to the north, west and east; and the Holston River borders the plant to the southeast. Since 1942, the facility has manufactured explosives in two distinct manufacturing areas which are linked by an interplant railroad. Access to the facility is controlled by a security fence and manned security posts.

The mission of the facility is the production of defense-related explosive compounds and mixtures. HSAAP manufactures various explosive materials for use in the assembly of a diversity of military munitions.

PURPOSE

This fact sheet is prepared pursuant to Tennessee Rule 1200-01-11-.07(7)(d) for the draft permit developed by the Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management. The purpose of this permitting process is to afford any

interested persons the opportunity to evaluate the ability of the permittee to apply the applicable hazardous waste management requirements. The proposal is for the permit to be issued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101 et seq., and Chapter 1200-01-11, of Hazardous Waste Management Regulations. The permit is prepared in accordance with the provisions of Tennessee Rule 1200-01-11-.07. From 1942 to 1984, all explosive wastes generated by HSAAP were burned on the ground on burn pads, in burning piles and in the burning cages located at the Burning Ground. Since 1984, off-specification explosives and waste explosive residues have been open burned in four clay-lined burn pans located at the Burning Ground, in 1986, HSAAP installed a new clay base and berm, a stormwater drainage system and a fence around the Burn Pans. Stormwater captured in the drainage system is piped to an onsite industrial wastewater treatment facility. Ashes generated from burn activities are transported and disposed in the facility's on-site landfill.

PERMIT HISTORY AND PROPOSED PERMIT

The facility is currently an interim status facility having submitted their original Part A application on November 14, 1980 and Part B Permit application on 1988, February 21, 1995, June 15, 2000, and February 16, 2002. Facility is currently seeking to continue use of the four burn pans to treat hazardous waste in this proposed permit. The facility will be limited to treating waste with the following hazardous waste codes: (D003), (D030), and (K044). The total maximum capacity of 5,000 pounds net explosive weight (NEW) of explosive material proposed to be treated at the Burn Pan Unit. Each pan can be loaded up to a maximum of 1,500 pounds NEW as long as the 5,000-pound total limit is maintained.

GROUNDWATER MONITORING

Rule 1200-01-11-.06(27)(b)1 and Paragraph III.H.1 require the permittee to prevent any release that may have adverse effects on human health or environment due to migration of waste constituents in the ground water or subsurface environment. Rule 1200-01-11-.06(1)(d) "Waivers" states "Any standard under this Rule may be waived by the Commissioner if the owner or operator can demonstrate to the satisfaction of the Commissioner that the standard is inapplicable, inappropriate, or unnecessary to his facility, or that it is equaled in effect by other procedures or mechanisms utilized at the facility." In accordance with that Rule, the Commissioner waives the need for Point of Compliance groundwater monitoring at the open burning treatment unit. However, site-wide and other corrective action groundwater monitoring requirements are provided in Permit Attachment 9, Groundwater Monitoring.

The facility has An Air Pollution Permit Number: 558406 Issued pursuant to Tennessee Air Quality Act on June 30, 2009 by Tennessee Air Pollution Control Board to fulfill the requirements of Title V of Federal Clean Air Act for emission limitations and monitoring requirements. National Pollutant Discharge Elimination System (NPDES) Permit (Number: TN0003671) dated April 01, 2010 by Division of Water Pollution Control (DWPC) authorizes HOAP to discharge and monitor treated industrial wastewater.

The conditions for continued corrective action of solid waste management units (SWMUs) and areas of concern (AOCs) at the facility are addressed in Corrective Action Order No. 03HCA002 which was issued for (HAAP) on April 16, 2003. The Corrective Action Order details the procedures and schedule that Holston must follow for reporting the discovery of newly identified SWMUs and AOCs and newly discovered release from existing SWMUs or AOCs. Further corrective action for newly identified SWMUs, AOCs or releases shall follow the procedures as

described in the Order. The proposed permit also requires notification of imminent hazards, and when applicable compliance with the requirements developed under any organic emission standard.

COMMENTS

Copies of the draft permit, fact sheet, and public notice are available for public inspection at Kingsport Public Library, 400 Broad Street, Kingsport, TN (423-229-9489); and Church Hill Branch Library 412 East Main Blvd, Church Hill, TN 37642 (423 357-4591). These materials are also available for public inspection during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Johnson City Field Office, Public Access Area, 2305 Silverdale Road Johnson City TN 38501 Telephone (423) 854-5400). The regulations under Rule 1200-01-11-.07(7)(e) require that a 45 day comment period be instituted for each draft permit under the Hazardous Waste Management Act. The comment period will begin on **September 20, 2010** which is the date of publication of the public notice in the major local newspaper of general circulation, and will end on **November 3, 2010**.

All persons, including the applicant, who believe that the tentative decision to issue this permit is inappropriate must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by the end of the above comment period deadline.

Any interested person wishing to obtain further information, to request a public hearing, or to comment on this proposed permit action should request or comments to: Mr. Malek Faradji; Corective Action Section; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-0822 or e-mail to malek.faradji@tn.gov.

When the Division makes a final permit decision to either issue or deny the permit, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective upon signing by the Division Director.

Persons who wish to be on the Division's mailing list should request a Mailing List Request form by calling or writing: Public Participation Officer; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-0798; or e-mail Solid.Waste@tn.gov.

August 11, 2010



Address **4509 W Stone Dr**
Kingsport, TN 37660

Get Google Maps on your phone



Text the word "GMAPS" to 466453

