

**NOTICE OF FINAL DECISION TO A HAZARDOUS
WASTE MANAGEMENT OPEN BURN TREATMENT PERMIT
TO HOLSTON ARMY AMMUNITION PLANT**

The Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management (DSWM) has made a final decision 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). The permit was issued on March 31, 2011, and shall remain in effect until March 31, 2021, unless revoked and reissued, or terminated, or continued under applicable regulations. This action follows a 45-day public comment period for the draft permit, which ended on November 3, 2010. No comments or a request for a public hearing were received from the public during this comment period, but the comments were received from the facility.

The facility, HSAAP, with EPA ID Number: TN5 21 002 0421, is located at 4509 West Stone Drive in Kingsport, TN 37660, had 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.

The new Permit, TNHW-148 will 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. D003, D030, and K044 are the only explosive hazardous wastes 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 issued to 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.

This permit is 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 Tennessee Rule Chapter 1200-01-11, Hazardous Waste Management.

A copy of the permit, including the Response to Comments, is 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 Environmental Field Office,

Public Access Area, 2305 Silverdale Road, Johnson City, TN 37601 (423-854-5400) and the TDEC Div. Solid Waste Management, Central Office, 5th Floor, L&C Tower, 401 Church St., Nashville, TN 37243.

For further information, contact: Mr. Malek Faradji, Corrective Action Section; Division of Solid Waste Management; TDEC; 5th Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535; phone 615-532-0822; fax 615-532-0886; or e-mail malek.faradji@tn.gov .

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; TDEC; 5th Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535; telephone 615-532-0798; or e-mail Solid.Waste@tn.gov.

NOTICE ISSUED: April 20, 2011,



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243 – 1535

April 7, 2011

Mr. Robert Ragan
Commander's Representative
Holston Army Ammunition Plant
4509 West Stone Drive
Kingsport, TN 37660-1048

RE: Response to Comments
Holston Army Ammunition Plant
Kingsport, Tennessee
Unit: Burn Pan Unit
EPA ID No: TN5210020421
Permit Number: TNHW-148

Dear Mr. Ragan

Attached is a copy of the Response to Comments for the hazardous waste Open Burn Treatment Permit, TNHW-148, issued to Holston Army Ammunition Plant, in Kingsport, Tennessee on March 31, 2011.

If you have any questions, please contact Mr. Malek Faradji of my staff at (615) 532-0822.

Sincerely,

Mike Apple
Director

cc: Mr. Bob Winstead, BAE, Ordnance System, Inc.
Mr. Jon Johnston, Chief, RCRA Branch, EPA, Region 4
Mr. Fred Willingham, Johnson City Field Office, DSWM
Mr. William Krispin, Manager, Permitting Sections, DSWM
Ms. Jamie Burroughs, Manager, TSD Section, DSWM
Mr. Charles Burroughs, Manager, Corrective Action Section, DSWM
Mr. Al Frakes, Corrective Action Section, DSWM
Mr. Malek Faradji, Corrective Action Section, DSWM

RESPONSE TO COMMENTS
Holston Army Ammunition Plant
Kingsport, Tennessee

This document has been prepared in accordance with Tennessee Rule 1200-01-11-.07(7)(j). It has resulted from the Tennessee Division of Solid Waste Management's issuance of a draft permit to the U.S. Army Holston Army Ammunition Plant (HSAAP) located at 4509 West Stone Drive Kingsport, Tennessee 37660-1048, EPA Identification Number: TN5210020421. The permit conditions allow the facility to treat hazardous waste in Burn Pans.

A. Public Involvement Opportunities

A public notice of the issuance of the draft permit was published in the September 20, 2010 edition of The Kingsport Time-News in Hawkins County, Kingsport, Tennessee, and September 22, 2010 edition of The Rogersville Review in City of Rogersville Sullivan County, Tennessee. Several 30-second announcements of the action, referencing the notice published in the newspaper, were also provided over a local radio station (WRZK)-FM, Kingsport and Church Hill, Tennessee. The public notice advised the public that copies of the permit application, the draft permit, air dispersion modeling protocol and risk assessment, corrective action order, fact sheet and public notice were 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 were also available for public inspection, at the TDEC Johnson City Field Office Division of Solid Waste Management located at 2305 Silverdale Road, Johnson City, Tennessee, and at the TDEC Division of Solid Waste Management's Central Office; 5th Floor, L&C Tower; 401 Church Street Nashville, TN 37242-1535.

B. Public Comment/Response Summary

There were no written comments received from the public during the 45-day comment period. No members of the general public requested a public hearing. HSAAP submitted comments during the established 45-day comment period. These comments are addressed below. Tennessee's Division of Solid Waste Management (DSWM) made changes to the final permit. These changes are also addressed below.

HOLSTON ARMY AMMUNITION PLANT

Response To Comments on Draft Open Burn Permit

Facility Comments:

- COMMENT: #1.** Section I-F.8 and II.E.3 require inspection records to be maintained for 5 years; however OSI currently maintains the records for 3 years. Attachment 4 (page 4-1) and the current Interim Permit indicate that records should be maintained for 3 years. OSI requests that Section I-F.8 and II.E.3 be modified to 3 years.
- RESPONSE:** Tennessee Rule 1200-01-11-.06(5)(d)2(v) requires the owner or operator of the facility to keep the records of inspections for (5) years. Attachment 4 Page 4-2 has been changed from 3 years to 5 years.
- COMMENT: # 2.** Sections II. P to II. R are not applicable, can they be removed?
- RESPONSE:** These are standard conditions for all RCRA Permits in Tennessee, even though they may not be applicable at this time for this unit, they will not be removed.
- COMMENT: # 3.** Section III. E. 3 does not allow the placement of hazardous waste on the burn pan units if any of the monitoring equipment fails to operate properly. Request adding, "in the event of a malfunction of monitoring equipment, weather conditions will be obtained from the National Oceanic and Atmospheric Administration (NOAA)."
- RESPONSE:** The change has been made on Page III-3 E-3 as requested.
- COMMENT: # 4.** Section III.E. 4 is missing a word in the following phrase, "until such time that the? Is certified..." Also, "...certified in closed accordance with this permit," is not clear. Recommend changing to "certified as closed in accordance with this permit."
- RESPONSE:** The changes have been made on Page III-3 Section III.E.4.
- COMMENT: # 5.** Section III. F.1 does not allow open burning two hours before or after the listed meteorological conditions. Weather conditions are very unpredictable. OSI requests removing the text that states "within two (2) hours before or after the treatment schedule" and replace with "before and during treatment." Per E.1 weather parameters will be checked prior to each thermal treatment to ensure that meteorological conditions are favorable to commence and continue thermal treatment.

RESPONSE: Section III.F.1 has been changed to “Open burning shall not occur whenever any of the following meteorological conditions are present or reasonably expected to occur during thermal treatment.”

COMMENT: # 6. Section III.F.4 requires checking meteorological conditions prior to placement of waste on burn pans. This is a change from current operations. Request removing “prior to transporting the waste to the burn pan(s)”. As explained in Attachment 8, depending on moisture content the material may require several days to dry on the pan before it can be thermally treated.

RESPONSE: In Section III.F.4 “prior to transporting the waste to the burn pan(s)” has been removed.

COMMENT: # 7. Section III.F.4 (b) mentions concrete pads. Please change “concrete pads” to “burn pan area.”

RESPONSE: In Section III.F.4 (b) “concrete pads” has been changed to “burn pan area.”

COMMENT: # 8 Section III.F.5 (c) and (d) should be removed. The permittee does not have scheduled thermal treatment dates. Explosives must contain moisture to be handled safely, so the permittee does not thermally treat them until they have sufficiently dried. Thermal treatment is rarely conducted on the same day that waste is placed on the burn pan units. Burn pan units are only left uncovered during favorable meteorological conditions and during daylight hours. When meteorological conditions are met and the waste is sufficiently dried, thermal treatment takes place.

RESPONSE: In Section III.5 (c) the word “daily” has been added to the sentence, and Section III.5.(d) has been removed.

COMMENT: # 9. Section III.F.6 should state, “The permittee shall complete removal of spilled or leaked waste from the burn pan and surrounding soils on the same day of thermal treatment...” In addition, there is never any accumulated precipitation on the burn pans because they are always covered during unfavorable meteorological conditions.

RESPONSE: Section III.F.6 has been changed to read “The permittee shall remove spilled or leaked waste from the burn pan(s) and surrounding soils immediately after placement of material on the burn pan(s) in accordance with Attachment 8 of this permit.

COMMENT: # 10. Section III.F.11 should change concrete “pads” to concrete “bumpers.”

RESPONSE In Section III.F.11 concrete “pads” has been changed to concrete “bumpers.”

COMMENT: # 11. Section III.K.1 (c) should change “treated **should** be 3 inches” to “treated **must** be no more than 3 inches.”

RESPONSE: Section III.K.1 (c) has been changed to “The depth of energetic waste to be treated must be 3 inches, or less to avoid the potential for detonation and facilitate effective treatment.”

COMMENT: # 12. Section III.K.1.(i) requires that the containment devices should be cleaned of any residue and managed as hazardous waste until determined otherwise. Currently, the “residues are cleaned periodically from the burn pans and are treated as hazardous waste until samples are collected and analytical results prove otherwise.”

RESPONSE: The State disagrees. Facilities that treat hazardous waste by open burn open detonation must sample the residues. The paragraph has been changed to “Prior to removing any treated residues from the burn pans any residue is managed as hazardous waste until determined otherwise based on waste analyses”.

COMMENT: # 13. Section VI, Item #1 requires a risk assessment to be conducted on a new waste to be treated in the burn pans. Rather than a full-scale risk assessment each time a product is added, OSI recommends providing a waste analysis of the new waste as described in Section III. G. 2.

RESPONSE: In addition to the waste analysis as described in Section III. G. 2, an evaluation of the new wastes’s effect on the ecological and human risk must be undertaken.

COMMENT: # 14 Section VI, Item #2 requires soil sampling twice a year. OSI requests that Item #2 be waived. It is OSI’s understanding that this is normally only required upon closure of a RCRA Unit and not of a permitted active RCRA unit.

RESPONSE: Section E-3-1 **Burn Pan Unit Sampling Rationale** of the permit application states “Open burning is a vigorous exothermic reaction. The potential exists for explosive materials to be ejected from the burn unit and to land on the ground surface surrounding the burn pans.” The State agrees, therefore, biannual soil sampling around the burn units is required to provide an “early warning” of potential contamination of the soil, which could infiltrate into the groundwater.

After a period of biannual sampling, HSAAP may evaluated the results and request a permit modification for an alternate sampling frequency.

COMMENT: # 15. Section VI requires a reapplication every 5 years for any waivers granted under this permit. Section V waives the requirement to conduct point of compliance groundwater monitoring. Will a reapplication be necessary for this waiver?

RESPONSE: Yes, the permittee must reapply every 5 years for continuation of this waiver.

COMMENT: # 16 Attachment 1, Figure 1.1-1 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: Figure 1.1-1 has been updated.

COMMENT: # 17. Attachment 1, Figure 1.1-2 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: Figure 1.1-2 has been updated.

COMMENT: # 18. Attachment 1, Figure 1.1-3 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: Figure 1.1-3 has been updated.

COMMENT: # 19. Attachment 2, paragraph 3, "Manufacturing Area Materials Chemical and Physical Information." Please remove "and trinitrotoluene (TNT)." TNT is not manufactured onsite but is purchased offsite as a raw material. Please add "NTO," "DNAN," and TATB to products manufactured onsite.

RESPONSE The change has been made as requested.

COMMENT: # 20. Attachment 2, Tables 2-1, 2-2, and 2-3 needs to be updated. An updated list will be provided by November 30, 2010.

RESPONSE: Tables 2-1, 2-2, and 2-3 have been updated.

COMMENT: # 21. Attachment 2, Table 2-1, page 2-4 has a typo. DNA needs an "N" so it is DNAN (2,4, Dinitroanisole).

RESPONSE: The change has been made.

COMMENT: # 22. Attachment 2, Figure 2-2 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: In Attachment 2, Figure 2-2 has been updated.

COMMENT: # 23. Attachment 2, page 2-14, "Treatment Residues" paragraph requires annual testing of each burn pan. Why is the treatment residue required to be tested for TCLP metals when on page 2-1 of Attachment 2 it is acknowledged that RCRA metals are not utilized in the manufacturing of explosives? Metals would actually sensitize explosives. A great deal of care is taken into not allowing metals into any of the products as metal to metal contact creates unsafe work conditions and is a possible source of detonation.

RESPONSE: After further discussions the permittee elected to withdraw this comment.

COMMENT: # 24. Attachment 3, under the "24-Hour Surveillance System" paragraph, the phrase "a 24-hour intrusion detection system, including" should be deleted.

RESPONSE: The change has been made.

COMMENT: # 25. Attachment 3, the typo in the title of the "Control Access" paragraph needs to be corrected.

RESPONSE: The change has been made.

COMMENT: # 26. Attachment 3, under the "Control Access" paragraph should delete the phrase "an intrusion alarm system, as well as."

RESPONSE: The change has been made.

COMMENT: # 27. Attachment 3, Figure 3-1 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: In Attachment 3, Figure 3-1 has been updated.

COMMENT: # 28. Attachment 4, Paragraph "Equipment Requirements" on page 4-2, second paragraph needs to change building #6 to HSAAP Security Dispatch.

RESPONSE: Building #6 has been changed to HSAAP Security Dispatch.

COMMENT: # 29. Attachment 4, in the Section of "Testing and Maintenance of Equipment" on page 4-3, need to remove "and intrusion detection systems" from the paragraph beginning with "The security camera..."

RESPONSE: The change has been made.

COMMENT: # 30. Attachment 4, Figure 4-2, #4 needs to be removed. Fire blankets are no longer available.

RESPONSE: The State agrees. The change has been made.

COMMENT: # 31. Attachment 4, Figure 4-2, need to change the load limit on #8 to 500 pounds instead of 750 pounds.

RESPONSE: The load limit has been changed to 500 pounds instead of 750 pounds.

COMMENT: # 32. Attachment 5, under the Operating Procedures in the General Information section on page 5.1-3, the paragraph needs to change the location of the video monitor. The video monitor is located at Building 20, not behind wood barricade and in the Burning Ground trailer.

RESPONSE: The change has been made.

COMMENT: # 33. Attachment 5, under the Emergency Equipment Section, "First-Aid Equipment" paragraph please remove "(Bldg. No. 7)" on page 5.1-11.

RESPONSE: The change has been made.

COMMENT: # 34. Attachment 5, under the Emergency Equipment Section, need to add the "Plant-wide emergency warning system" to the list of equipment in the "Emergency Communications and Alarm System" paragraph on page 5.1-12.

RESPONSE: The change has been made.

COMMENT: # 35. Attachment 5, under the Preventive Procedures, Structures, and Equipment Section, need to remove "include fire retardant outer clothing," and "The barricade serves as protection against any explosions" in the "Personnel Protective Equipment," paragraph on 5.1-15.

RESPONSE: The change has been made.

COMMENT: # 36. Attachment 5, Figure 5.1-1 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: In Attachment 5, Figure 5.1-1 has been updated.

COMMENT: # 37. Attachment 5, Figure 5.1-2 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: Figure 5.1-2 has been updated.

COMMENT: # 38. Attachment 5.2 – Coordination Agreements. The most current agreements will be provided by November 30, 2010.

RESPONSE: Attachment 5.2 – Coordination Agreements has been updated.

COMMENT: # 39. Attachment 6, Figure 6.1-1 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: Figure 6.1-1 has been updated.

COMMENT: # 40. Attachment 6, Figure 6.1-2 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: Figure 6.1-2 has been updated.

COMMENT: # 41. Attachment 8, under the “Burn Pan Unit” paragraph on page 8-1, please add, “waterproof plastic sheet” to the list.

RESPONSE: In Attachment 8, under the “Burn Pan Unit” paragraph on page 8-1, “waterproof plastic sheet” has been added to the list.

COMMENT: # 42. Attachment 8, under the “Operating Procedures” Section, “Personnel Safety” paragraph on page 8-4, “flame retardant” should be removed and replaced with white “cotton” coveralls.

RESPONSE: In Attachment 8, under the “Operating Procedures” Section, “Personnel Safety” paragraph on page 8-4, “flame retardant” has been removed and replaced with white “cotton” coveralls.

COMMENT: # 43. Attachment 8, paragraph “Waste Ignition” on page 8-5, please remove all 8 sentences starting with “Both people, one a Safety...” and ending with “...shows that the burn has been completed.” Please replace these sentences with the following:

“Both people, one a Safety Department Representative, move to the remote ignition area which is currently located inside Building 20 on the west wall. The controls to the remote ignition system are in two locked metal boxes spaced approximately 15 feet apart. The Safety Department Representative has the only key. To activate the ignition system, one person at each box has to depress and hold a manual switch in order to

complete the ignition circuit. Ignition normally takes approximately three minutes. The burn pan is monitored by closed circuit TV and when ignition takes place, the manual switches are released and the metal boxes are returned to the locked position. No person shall enter the burn field until at least 30 minutes after there is no visible flame observed on the closed circuit TV.”

RESPONSE: The change has been made.

COMMENT: # 44. Attachment 8, Figure 8.1 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: In Attachment 8, Figure 8.1 has been updated.

COMMENT: # 45. Attachment 8, Figure 8.2 needs to be updated. A new Figure will be provided by November 30, 2010.

RESPONSE: In Attachment 8, Figure 8.2 has been updated.

COMMENT: # 46. Attachment 8, Section “Maintenance Procedures,” paragraph #3 on page 8-6, please remove ...”and intrusion detection systems” and “Security Department” and replace “Security Department” with “OSI Instrument Technicians.”

RESPONSE: The change has been made.

COMMENT: # 47. Any reference to “wooden barricade” at the burning ground area should be changed to refer to Building 20. Building 20 is where the remote operations currently take place. Building 20 is located at the east end of the burning ground.

RESPONSE: References to “wooden barricade” at the burning ground area have been changed to refer to Building 20.

COMMENT: # 48. Any reference to “a 24-hour intrusion detection system” should be removed. A closed-circuit television security system serves to detect intruders and to monitor burning activities.

RESPONSE: References to “a 24-hour intrusion detection system” have been removed.

DIVISION CHANGES TO HOLSTON ARMY AMMUNITION PLANT DRAFT PERMIT

For final permit issuance, listed below are the changes the Division of Solid Waste Management made to Holston Army Ammunition Plant's Draft Permit. Additions are noted by bold italicized text.

1. In Attachment 2 Table 2-4 on page 2-8 was for 2001. The table was considered obsolete and has been removed.
2. The following paragraphs have been added to Attachment 2, page 2-21, to provide additional requirements to waste received from offsite.

A complete waste characterization provided by the off-site generator will be reviewed by HSAAP before HSAAP agrees to accept the waste. For each new waste stream that is a candidate for management by the facility, the generator will provide the facility with any required Land Disposal Restriction Notification/Certification Information and/or Data [TN Rule 1200-01-11-10(1)(g)1]; and other supporting documentation, including information such as Material Safety Data Sheets, product ingredients, analytical data, etc.

Waste Profile Re-evaluation

In accordance with TN Rule 1200-01-11-.06(2)(d), a waste profile re-evaluation will be conducted when one of the following occurs:

- ***A generator notifies the facility that the process generating the waste has changed;***
- ***The results of inspection or analysis indicate that the waste received at the facility does not match the identity of the waste designated on the accompanying manifest (or shipping paper) or pre-acceptance documentation; or***
- ***Every two years. A biennial waste profile re-evaluation along with a vigilant incoming load-screening program is sufficient to ensure that wastes continue to be properly managed at the facility.***
- ***For bullets one and three above, this re-evaluation process may consist of a review of the paperwork to ascertain that the analytical data is accurate and current and that it is sufficient to properly manage the waste as intended. The procedure typically involves comparing the current waste profile to the available results of routine inspection, sampling, and analysis obtained upon receipt of an incoming load of the waste stream. To augment this review, if existing analytical is not sufficient, the generator may be asked to review the current waste profile, to supply a new profile, and/or to***

submit a sample for analysis, or the facility may obtain a sample from a load of the waste.

3. All references to the Federal Regulations (CFR) in Attachment 2 have been changed to the equivalent Tennessee State Regulations (Rules).
4. The process description on page 2-21 & 2-22 states that the wastes are D003, **D0030 (TYPO, should be D030)** & K044 and does not address solvents used in the recrystallization of crude explosives as underlying hazardous constituents.

The following paragraphs have been added to address this in the final permit:

Attachment 2 page 2-2 paragraph 3-4-5 and 6 has been changed as follows:

- 3 The crudely washed explosive, in water slurry, is pumped to Building G (Recrystallization Building). The explosive is partially dissolved in a solvent, simmered, and recrystallized by boiling off the solvent. The solvent vapor is condensed and collected in a tank for re-use. The remaining explosive and water slurry is pumped to Building H (Dewatering Building), where it is discharged to nutschs. The excess water is removed by vacuum and the weight adjusted.***

A representative list of solvents includes.

- ***Toluene,***
 - ***MEK,***
 - ***Acetone,***
 - ***Cyclohexanone,***
 - ***n-octane, and***
 - ***Ethyl acetate.***
- 4. The explosive is then sent to one of the Incorporation Buildings or returned to Building G, where it is combined with supplied raw materials to produce the specified final formulation.***
 - 5. The final products are then sent to Building N for packaging.***
 - 6. From Building N, the products go either directly to the loading docks for shipment or to a storage magazine for storage.***

Attachment 2, page 2-13, the second paragraph has been changed as follows:.

The composition of any new formulation will be reviewed by HSAAP to determine whether any underlying hazardous constituents are present.

If any underlying hazardous constituents are present, the Burn Pan Unit treatment residue will be analyzed to determine whether the treatment standard has been met.

5. In Section III. K. (k), Page III-9, D003 has been removed.

6. On page 8-5 of Attachment 8, under Waste Drying Section the wind speed from 30 miles per hour has been changed to 15 miles per hour.

MAF 3/06/11