



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

December 1, 2016

### VIA ELECTRONIC MAIL

Mr. Jay Stewart  
Environmental Manager  
Radford Army Ammunition Plant  
4050 Pepper's Ferry Road  
Radford, Virginia 24141

**Re: Class 1 Modification Approval for the Post-Closure Care Permit  
Radford Army Ammunition Plant, Radford, VA  
EPA ID No.VA1210020730**

Dear Mr. Stewart,

On November 21, 2016, the Department of Environmental Quality's (DEQ) Office of Financial Responsibility and Waste Programs received the Radford Army Ammunition Plant (RAAP) facility's Class 1 modification request to modify the post-closure care permit to revise the quantitation limits for antimony, lead and zinc; revise the method detection limits for zinc and cyanide; add tetrahydrofuran to the groundwater compliance monitoring list for HWMU-16; and revise the method suffixes for Methods 8260B and 8270C to Methods 8260 and 8270. In addition, enclosed in the transmittal were the proposed red line and strikeout changes, and the revised pages of the post-closure care permit.

Based on the review of the submitted request and supporting documents, the DEQ concurs that the request has established sufficient documentation to support the Class 1 permit modification of RAAP's Permit. Therefore, in accordance with 40 CFR §270.42, Appendix I.C.2 and 40 CFR 270.42(a)(1), the DEQ approves the Class 1 permit modification. The DEQ is incorporating the revised copy of the following permit sections into its copy of the RAAP Permit; please ensure that RAAP's copy of the permit is updated accordingly:

- **Permit Attachment 1, Appendix H** (Groundwater Compliance Monitoring Program — Example of Sampling and Analysis Plan for All Post-Closure Care Units), Appendix H.8 (EPA III Micro-Purging Guidance), BAE Systems Ordnance Systems Inc. Radford Army Ammunition Plant Low-Flow Groundwater Sampling and Analysis Plan

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- **Permit Attachment 1, Appendix I** (Annual Groundwater Sampling Constituent List — Appendix IX 40 CFR Part 264)
- **Permit Attachment 2, Appendix E** (HWMU-5 Groundwater Compliance Monitoring Semiannual Constituent List)
- **Permit Attachment 2, Appendix G** (HWMU-5 Groundwater Protection Standards)
- **Permit Attachment 2, Appendix K** (HWMU-5 Groundwater Corrective Action Annual Monitoring List)
- **Permit Attachment 3, Appendix E** (HWMU-16 Groundwater Compliance Monitoring Semiannual—Constituent List)
- **Permit Attachment 3, Appendix G** (HWMU-16 Groundwater Protection Standards)

Under 40 CFR § 270.42 (a)(1)(ii), this Class 1 permit modification requires the Permittee to send notice of the modification to all persons on the facility mailing list (Enclosure) within 90 days after the change is put into effect. In addition RAAP must provide documentation to this Office regarding compliance with the public notice requirement. Please submit evidence of this mailing (return receipts, copy of the notification letter, etc.) when available.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date of service of this decision to initiate an appeal by filing a notice of appeal with:

David K. Paylor, Director  
Department of Environmental Quality  
P.O. Box 1105  
Richmond, Virginia 23218

In the event that this decision is served to you by mail, three days are added to this period. Please refer to Part 2A of the rules of the Supreme Court of Virginia, which describes the required contents of the Notice of Appeal, including specification of the Circuit Court to which the appeal is taken, and additional requirements governing appeals from decisions of administrative agencies.

If you should have any questions concerning this permit action, please contact Mr. Ashby Scott of my staff at (804) 698-4467 or by email at [Ashby.Scott@deq.virginia.gov](mailto:Ashby.Scott@deq.virginia.gov).

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Sincerely,



Leslie A. Romanchik  
Hazardous Waste Program Manager  
Office of Financial Responsibility and  
Waste Programs

cc: Catherine McGoldrick, EPA, Region III (3LC50)  
Elizabeth Lohman, DEQ, Blue Ridge Regional Office  
Leslie A. Romanchik, Kurt Kochan, Brett Fisher, Maria Livaniou DEQ, CO  
Central Hazardous Waste Files

Jim McKenna, Radford Army Ammunition Plant