BAE SYSTEMS

HOLSTON ARMY AMMUNITION PLANT

KINGSPORT, TENNESSEE

HAZARDOUS WASTE COMBUSTOR NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

DRAFT NOTIFICATION OF INTENT TO COMPLY

SEPTEMBER 2021

Coterie ENVIRONMENTAL

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1.0 INTRODUCTION

This Notification of Intent to Comply (NIC) is being submitted by BAE Systems, Ordnance Systems Inc. (BAE) pursuant to Title 40 Code of Federal Regulations (CFR) Part 63 Section 1210(b) for a new hazardous waste combustor (HWC) that is planned for installation at the Holston Army Ammunition Plant (HSAAP) in Kingsport, Tennessee. The HWC will include a car bottom style flashing furnace and an extensive air pollution control (APC) system. Once operational, this system will be able to process some of the hazardous explosive wastes and non-hazardous explosive-contaminated wastes that are currently processed at the facility's open burning ground (OBG). The new HWC will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for HWCs codified in 40 CFR Part 63 Subpart EEE.

1.1 FACILITY OVERVIEW

The HSAAP is a government-owned, contractor-operated facility used for manufacturing explosive compounds and explosive formulations. HSAAP is located in Hawkins and Sullivan Counties in northeastern Tennessee. The plant is comprised of two distinct manufacturing areas known as Area A and Area B. In addition to the production lines, these areas include explosive material storage magazines, an industrial landfill, an industrial wastewater treatment plant, and several office buildings that provide administrative, environmental, health, safety, and security support services.

The street address of the HSAAP is:

Holston Army Ammunition Plant
4509 West Stone Drive
Kingsport, Tennessee 37660

All correspondence should be directed to the facility contact at the following address and number:

Claire Powell
Manager, Communications
4050 Peppers Ferry Road
P.O. Box 1
Radford, VA 24143
540-639-7709

1.2 FLASHING FURNACE OVERVIEW

Presently, BAE operates the OBG to destroy non-hazardous explosive-contaminated waste and hazardous explosive waste generated at the HSAAP. The hazardous explosive waste is treated in the burn pan unit (BPU), which is permitted under the Resource Conservation and Recovery Act (RCRA) as a miscellaneous hazardous waste treatment unit. The new flashing furnace system will treat the majority of the non-hazardous explosive-contaminated wastes burned at the OBG and a portion of the hazardous explosive wastes treated in the BPU.

The new thermal treatment system will consist of a car-bottom style flashing furnace and high-temperature afterburner that will ensure the destruction of greater than 99.99 percent of the explosive organic constituents in the treated wastes. The system will be equipped with a state-of-the-art APC system, consisting of a gas cooler, a baghouse, a wet scrubber, a high-efficiency particulate air (HEPA) filter, and a selective catalytic reduction (SCR) unit. A selective non-catalytic reduction (SNCR) injection grid will be included downstream of the afterburner for use during traditional decontamination cycles (*e.g.,* contaminated metal flashing cycles). During these cycles, the flue gases will divert around the HEPA and SCR to avoid the duct reheat necessary for treatment in the SCR after wet scrubbing. Scrubbed emissions from the thermal treatment system will be vented to the atmosphere through an exhaust stack. The system will be equipped with adequate sampling ports to measure the stack gas emissions and ensure that they comply with all applicable emission standards.

1.3 Regulatory Overview

On September 30, 1999, the United States Environmental Protection Agency (USEPA) promulgated the HWC NESHAP under the joint authority of the Clean Air Act Amendments of 1990 (CAAA) and RCRA. The HWC NESHAP is codified in 40 CFR Part 63 Subpart EEE. The standards are based upon the maximum achievable control technology (MACT). Originally, the HWC NESHAP regulated emissions from three equipment categories: hazardous waste incinerators, cement kilns, and lightweight aggregate kilns. These sources are referred to as Phase I sources. On October 12, 2005, USEPA amended Subpart EEE to include Final Replacement Standards for Phase I sources and to incorporate standards for Phase II sources (*i.e.*, liquid fuel-fired boilers, solid fuel-fired boilers, and hydrochloric acid production furnaces that burn hazardous waste). The HWC NESHAP limits emissions from both new and existing facilities in each equipment category.

The flashing furnace will be subject to the HWC NESHAP emission standards for new hazardous waste incinerators. The applicable emission standards are summarized in Table 1-1 and are described below:

- 40 CFR § 63.1219(b)(1) mandates that the flashing furnace may not emit dioxins and furans (D/F) in excess of 0.11 nanograms toxic equivalence per dry standard cubic meter (ng TEQ/dscm), corrected to seven percent oxygen.
- 40 CFR § 63.1219(b)(2) mandates that the flashing furnace may not emit mercury in excess of 8.1 micrograms per dry standard cubic meter (µg/dscm), corrected to seven percent oxygen.
- 40 CFR § 63.1219(b)(3) mandates that the flashing furnace may not emit combined emissions of lead and cadmium, referred to as semivolatile metals (SVM), in excess of 10 µg/dscm, corrected to seven percent oxygen.

- 40 CFR § 63.1219(b)(4) mandates that the flashing furnace may not emit combined emissions of arsenic, beryllium, and chromium, referred to as low volatile metals (LVM), in excess of 23 µg/dscm, corrected to seven percent oxygen.
- 40 CFR § 63.1219(b)(5)(i) and (ii) mandate that the flashing furnace may not emit carbon monoxide (CO) in excess of 100 parts per million by volume on a dry basis (ppmv dry) over an hourly rolling average and corrected to seven percent oxygen, or hydrocarbons (HC) in excess of 10 ppmv dry over an hourly rolling average, corrected to seven percent oxygen, and reported as propane.
- 40 CFR § 63.1219(b)(6) mandates that the flashing furnace may not emit hydrogen chloride and chlorine (HCl/Cl_2) in excess of 21 ppmv dry, expressed as chloride (Cl^-) equivalents and corrected to seven percent oxygen.
- 40 CFR § 63.1219(b)(7) mandates that the flashing furnace may not emit particulate matter (PM) in excess of 0.0016 grains per dry standard cubic foot (gr/dscf), corrected to seven percent oxygen.
- 40 CFR § 63.1219(c)(1) requires that the flashing furnace satisfy a destruction and removal efficiency (DRE) of 99.99 percent for each designated principal organic hazardous constituent (POHC).

TABLE 1-1
EMISSION STANDARDS FOR NEW FLASHING FURNACE

PARAMETER	EMISSION STANDARD [1]
Dioxins and furans	0.11 ng TEQ/dscm
Mercury	8.1 µg/dscm
Semivolatile metals	10 µg/dscm
Low volatile metals	23 µg/dscm
Carbon monoxide	100 ppmv dry
Hydrocarbons	10 ppmv dry
Hydrogen chloride and chlorine	21 ppmv dry
Particulate matter	0.0016 gr/dscf
Destruction and removal efficiency	99.99%

[1] All concentration-based emission standards are corrected to seven percent oxygen.

1.4 INTENT TO COMPLY

HSAAP intends to comply with the HWC NESHAP as codified in 40 CFR Part 63 Subpart EEE. The flashing furnace will comply with all of the applicable emissions standards and operating requirements upon startup of hazardous waste operations and will work with the Tennessee Department of Environment and Conservation (TDEC) to incorporate appropriate requirements into their Title V Operating Permit. Compliance with the applicable HWC NESHAP standards will be demonstrated by conducting a comprehensive performance test (CPT) within one year of startup of hazardous waste operations.

1.5 DOCUMENT ORGANIZATION

This NIC has been prepared following the regulations codified in 40 CFR §§ 63.1210(b) and 63.1212. The remaining sections of the document provide the following information:

- Section 2 presents waste minimization techniques that are applied at HSAAP to minimize the need for onsite thermal treatment of hazardous wastes;
- Section 3 presents the emission control techniques that were considered to comply with the HWC NESHAP;
- Section 4 presents emission monitoring techniques that will be used to demonstrate compliance with the HWC NESHAP;
- Section 5 summarizes the key activities and milestones for compliance;
- Section 6 provides information on the NIC public meeting and notices;
- Section 7 is a summary of HSAAP's intent to comply with the HWC NESHAP;
- Section 8 presents the required document certification; and
- Appendix A includes an example of the public meeting notice that will be mailed to the facility mailing list.

2.0 WASTE MINIMIZATION TECHNIQUES

In accordance with 40 CFR § 63.1210(b)(1)(i)(C), this section provides information on the waste minimization techniques that HSAAP uses for compliance with the HWC NESHAP. Waste minimization is always a priority due to the inherent inefficiencies represented by excessive waste generation. HSAAP's waste minimization program is designed to help reduce the volume and toxicity of hazardous waste generated at the facility, as practicable from the standpoint of economics and safety.

In general, five different sources are responsible for generating the wastes treated at the OBG: manufacturing operations, maintenance activities, product inventory management operations, laboratory operations, research and development (R&D) operations, and modernization or demolition projects. These same wastes are targeted for inclusion in the waste feed to the flashing furnace system. The ability to reduce wastes varies by the source that is generating it.

2.1 MANUFACTURING WASTE

Hazardous explosive wastes and non-hazardous explosive-contaminated wastes are generated as part of the explosive and explosive formulation manufacturing operations at HSAAP. These include:

- Explosive and explosive-contaminated wastes from filtering operations;
- Explosive wastes from settling tanks;
- Explosive and explosive-contaminated wastes from building clean-ups and maintenance activities; and,
- Explosive wastes from production area concrete sumps referred to as catch basins, that collect process wastewater from explosives handling buildings and provide a mechanism for settling out of the explosive solids before the wastewater is sent to the industrial sewer.

The portion of these wastes that are classified as hazardous are classified as such due to their ignitability and/or reactivity; the wastes may also be hazardous due to toxicity characteristics and/or listings for specific industry sectors. For these wastes, the quality department has established procedures to allow non-conforming material to be reworked into the production line when possible. Measures are also in place to prevent foreign object debris (FOD) from contaminating the explosive production operations and leading to FOD-contaminated explosive waste.

Those explosive-contaminated wastes generated during manufacturing operations include materials such as spent filters and probe socks, operation and spill clean-up residues, such as rags and personal protective equipment (PPE), contaminated wooden pallets, and used equipment, such as rubber hoses, metal parts, and other small equipment that cannot meet the criteria for material documented as safe (MDAS). For these wastes, procedures are in place to segregate those materials that can be diverted to the on-site landfill or that can be recycled without requiring thermal decontamination.

2.2 PRODUCT INVENTORY MANAGEMENT WASTE

Finished explosive products and product intermediates manufactured at HSAAP are managed in earth-covered, concrete magazines. Once manufactured, the ultimate goal for these products and product intermediates is distribution throughout the defense network or incorporation into other products. However, occasionally, the manufactured explosives are removed from the explosive product inventory because they are no longer needed, they cannot be reworked, recycled, or sold, or their stabilizer levels have declined such that they present a storage hazard. In these cases, the explosive products are removed from the magazine, classified as hazardous waste, and treated by open burning at the BPU. A small portion of these wastes may be treated in the future flashing furnace system.

These wastes may be hazardous due to their ignitability, reactivity, or presence of chemicals for which a toxicity characteristic threshold has been established. The non-hazardous fraction of these wastes includes the cardboard containers in which these wastes are stored, the liners used in the containers, and the wooden pallets on which they are stored.

2.3 LABORATORY WASTE

HSAAP operates a laboratory that conducts quality control testing of formulated products and research for new explosives or process ingredients. During this process, hazardous explosive wastes and non-hazardous explosive-contaminated wastes may be generated as analyses are conducted or samples are discarded.

The portion of these samples that originates from end-product formulations or manufacturing wastes and residues are classified as hazardous wastes due to their ignitability and/or reactivity. In addition, hazardous wastes may be generated that are toxic for one of several solvents used in the analytical processes. Adherence to proper sampling procedures helps to minimize the generation of these wastes, directing operations on how to take representative samples that satisfy quality control requirements, and minimizing the need for the generation of excess, unusable samples. Once at the lab, the laboratory personnel follow strict procedures for analyzing the samples, minimizing the need for repetitive analyses, and minimizing the generation of excess reagent waste.

The non-hazardous, explosive-contaminated fraction of these wastes largely includes contaminated PPE and respirator cartridges. For these wastes, procedures are in place to segregate those materials that can be diverted to the on-site landfill or that can be recycled without requiring thermal decontamination.

2.4 RESEARCH AND DEVELOPMENT WASTE

The HSAAP R&D team conducts both laboratory-scale and pilot plant evaluations of manufacturing processes and techniques for existing or new explosive formulations. Some of the hazardous explosive waste from these R&D studies that is currently disposed of at the BPU will be directed to the new flashing furnace. These wastes may be hazardous for ignitability, reactivity, or any combination of toxicity codes specified previously. Before running R&D projects, the R&D team meets with the environmental team to discuss how to minimize waste generation and avoid excess material generation; efforts are made to generate only those quantities required to meet contractual requirements and/or demonstrate the viability of the operation.

The non-hazardous fraction of these wastes are similar to that fraction resulting from manufacturing operations and includes items such as spent filters and probe socks, operation and spill clean-up residues, such as rags and PPE, and used equipment, such as rubber hoses, metal parts, and other small equipment that cannot meet the criteria for MDAS. For these wastes, procedures are in place to segregate those materials that can be diverted to the on-site landfill or that can be recycled without requiring thermal decontamination.

2.5 Modernization and Demolition Wastes

In a continued effort to modernize the operations at HSAAP, multiple construction projects are being conducted throughout the facility. These modernization projects and the demolition activities associated with them generate non-hazardous explosive-contaminated wastes, such as contaminated wood, concrete, soil, gravel, and rock. In addition, PPE may be generated during these operations that are contaminated with explosives. Procedures are in place to inspect building materials, determine which may have come into contact with explosives, and divert materials to the landfill or recycle them when possible instead of requiring thermal decontamination.

3.0 EMISSION CONTROL TECHNIQUES

In accordance with 40 CFR § 63.1210(b)(1)(i)(C), this section provides information on the emission control techniques that HSAAP is considering to ensure that the emissions from the flashing furnace system comply with the HWC NESHAP.

As stated previously, HSAAP intends to operate the flashing furnace system in compliance with the HWC NESHAP. This goal will be met with the implementation of state-of-the-art combustion and APC systems. Combustion gases will flow from the flashing furnace unit into a high-temperature afterburner, a gas cooling system, a baghouse, a wet scrubber, a HEPA filter, and an SCR unit. An SNCR injection grid will be included downstream of the afterburner for use during traditional decontamination cycles (*e.g.,* contaminated metal flashing cycles). During these cycles, the flue gases will divert around the HEPA and SCR to avoid the duct reheat necessary for treatment in the SCR after wet scrubbing. Each of these pieces of APC equipment is intended to remove specific pollutants from the flue gas stream and was selected based on industry experience with similar systems.

3.1 ORGANICS DESTRUCTION

Proper thermal destruction of organics in any waste feed is achieved via the proper treatment of the materials at an elevated temperature for the length of time necessary to ensure complete oxidation of all carbon to carbon dioxide (CO_2) and all hydrogen to water vapor. Combustion chamber and burner design can enhance this destruction process by helping ensure the mixing of the hot burner flame with the combustion off-gases.

Proper thermal destruction in the proposed system will be achieved in the afterburner chamber. The main flashing furnace chamber is designed to provide safe ignition of all explosives in the batch and render any thermally-treated, non-combustible materials as MDAS. However, the flashing furnace chamber is not designed to fully oxidize these materials to CO_2 and water vapor. The temperatures of the chamber are targeted to meet Department of Defense (DOD) criteria for MDAS, not to meet the HWC NESHAP DRE criteria. Those criteria are satisfied by the afterburner, which is intended to provide the necessary high-temperature oxidation of the organics in the waste feed. The afterburner will be designed to raise the temperature of the flue gases to approximately 1,850 degrees Fahrenheit (°F) to ensure adequate destruction of 99.99 percent of the organic components of the waste feed. Burner and chamber design will be enhanced to provide proper mixing of the furnace off-gases with the burner flame.

3.2 POLLUTANT REMOVAL

The other HWC NESHAP regulated pollutants (PM, SVM, LVM, and HCl/Cl_2) must be removed from the flue gas stream once they are generated. The combustion process itself cannot prevent their generation absent preventing the constituents from being in the waste feed originally. With complex regulations such as the HWC NESHAP, which require significant removal of many different types of pollutants, multiple pieces of APC equipment are often required. Some may be used specifically to target particulate-based pollutants, while others may be combination devices that can remove multiple pollutants at once.

In the proposed system, an assembly of multiple pieces of APC equipment will be required to satisfy the HWC NESHAP control requirements.

From the afterburner, the flue gases will be rapidly cooled in a gas cooler before they enter the downstream APC system. This rapid cooling of the flue gases helps to minimize the formation of dioxin and furan compounds, which are generally formed from the slow cooling of combustion gases between a temperature range of 850°F and 350°F. After passing through the gas cooler, the flue gases will pass into a high-efficiency baghouse that is designed to remove 99 percent or more of the particulate-based pollutants (*i.e.,* PM, SVM, and LVM) from the flue gas stream. The flue gases will then move into the wet scrubber, where a combination of recycled and freshwater will be used with caustic to achieve the necessary removal of HCl/Cl_2 and other acid gases. The scrubber will also provide some additional control of PM and mercury emissions. After exiting the wet scrubber, the flue gases pass through a HEPA filter, as a final polishing step for PM and metals emissions before being reheated and entering the downstream SCR. Maintaining this polishing step before the SCR helps to minimize potential poisoning of the SCR catalyst and maximize its performance efficiency. As they exit the HEPA, the flue gases will then be reheated by an in-duct burner to the optimal temperature for treatment in the downstream SCR unit, which is intended to remove both nitrogen oxides (NOx) and D/F from the furnace exhaust gases. NOx removal is provided to achieve compliance with state air quality standards and is not relevant to the HWC NESHAP compliance. When the flashing furnace is operating as a traditional decontamination oven, an SNCR will be used in place of the SCR for NOx treatment. The injection grid for the SNCR will be included downstream of the afterburner. When this operation is selected, the gases will divert around the HEPA and the SCR to avoid the duct reheat system, which will reduce the CO_2 emissions to the atmosphere generated from the natural gas reheat burner. After exiting the SCR, the flue gases will be pulled through the induced draft (ID) fan and will exit through the stack to the atmosphere. The ID fan will maintain a negative pressure throughout the entire HWC and will help to minimize fugitive emissions of untreated flue gases. The exhaust stack for the system will be designed to provide adequate dispersion of the treated flue gases into the atmosphere.

3.3 EFFECTIVENESS

The flashing furnace and associated equipment were designed to meet the applicable HWC NESHAP emission standards. The selected combustion and APC systems have been demonstrated effective at achieving these goals in other incineration systems throughout the United States. Each piece of equipment will be targeted for specific control as follows:

- The afterburner is designed with state-of-the-art combustion technology to ensure 99.99 percent destruction of the organic constituents in the hazardous waste. In addition to meeting the DRE standard, the afterburner will achieve compliance with the CO, HC, and D/F emission standards.
- The gas cooler system will quickly reduce the temperature of the flue gases as they exit the afterburner, helping to minimize the formation of D/F and achieve compliance with the applicable emission standard.
- The feed rate of each regulated constituent (ash, SVM, LVM, mercury, and chlorine) will be controlled to limit the loading of pollutants to each piece of APC equipment and ensure their operation within design limitations.
- The high-efficiency baghouse will reduce PM, SVM, and LVM emissions in the flue gas to the extremely low levels dictated by the associated HWC NESHAP standards.
- The packed bed wet scrubber will utilize water and caustic mixes as well as high-efficiency packing materials to effectively reduce the HCl/Cl_2 levels in the flue gas to the required HWC NESHAP levels. The scrubber will also provide for some removal of particulate matter and mercury from the flue gas stream.
- The HEPA filter will provide a final polishing step for PM, SVM, and LVM emissions.
- The catalyst utilized in the SCR, in addition to reducing NOx from the flue gases, also destroys, reacts, and eliminates any D/F compounds that are generated with very high efficiency.

The final effectiveness of each of these control technologies will be demonstrated during the CPT, which will be conducted within six months of startup of hazardous waste operations.

3.4 Evaluation Criteria

Waste composition information and vendor design criteria were used as the basis for the evaluation of emission control techniques for the flashing furnace system. The evaluation criteria included:

- Technology efficiency;
- Operation impacts; and
- Cost-effectiveness.

Table 3-1 identifies the control technologies selected based on these criteria to meet each of the HWC NESHAP emission standards.

TABLE 3-1
TECHNOLOGIES SELECTED FOR COMPLIANCE

EMISSION STANDARD	TECHNOLOGY SELECTED TO ACHIEVE COMPLIANCE
Destruction and removal efficiency	Afterburner
Dioxins and furans	Afterburner and SCR
Mercury	Wet scrubber and feed rate limitation
Semivolatile metals	Baghouse, HEPA, and feed rate limitation
Low volatile metals	Baghouse, HEPA, and feed rate limitation
Carbon monoxide	Afterburner
Hydrocarbons	Afterburner
Hydrogen chloride and chlorine	Wet scrubber and feed rate limitation
Particulate matter	Baghouse, wet scrubber, HEPA, and feed rate limitation

4.0 EMISSION MONITORING TECHNIQUES

HSAAP will employ continuous monitoring systems (CMS), including continuous emissions monitoring systems (CEMS) and continuous parameter monitoring systems (CPMS), to demonstrate continuous compliance with the HWC NESHAP. HSAAP will also conduct periodic testing of the furnace emissions to demonstrate compliance with the emission standards.

4.1 CONTINUOUS EMISSION MONITORING

40 CFR § 63.1209(a)(1)(i) requires that a facility use CEMS to document compliance with the CO or HC emission standards. The facility is also required to use an oxygen CEMS to continuously correct the CO or HC levels to seven percent oxygen. HSAAP has chosen to monitor CO and oxygen continuously. The HC emissions will be monitored during the CPT. The installed CEMS will comply with the requirements of the Appendix to the HWC NESHAP and the applicable performance specifications.

4.2 CONTINUOUS PARAMETER MONITORING

Because not all of the HWC NESHAP regulated pollutants can be monitored with CEMS, CPMS will be used to monitor the process operations and to demonstrate that each of the monitored parameters is within the limits established per 40 CFR § 63.1209 of the HWC NESHAP. Appropriate operating parameter limits (OPLs) will be established for the afterburner, baghouse, wet scrubber, HEPA, and SCR. In addition, the weight and composition of each furnace batch will be monitored to ensure compliance with established feed rate limitations for regulated pollutants.

Each of these CPMS will be installed and operating on the unit upon startup and will be linked into the automatic waste feed cutoff (AWFCO) system. The AWFCO system will be programmed to ensure compliance with 40 CFR § 63.1206(c)(3), which requires that the system prevent feeding hazardous waste whenever OPLs or emission standards are exceeded.

4.3 PERIODIC EMISSIONS TESTING

HSAAP is required to perform periodic emissions testing to demonstrate compliance with the HWC NESHAP standards. This testing will be conducted following a written test plan, reviewed, and approved by TDEC. Within one year of startup of hazardous waste operations, HSAAP will perform the CPT on the flashing furnace. This test will measure the emissions of all HWC NESHAP regulated pollutants. The CPT plan, which will be finalized one year prior to the CPT, will describe the target OPLs, test conditions, and emission sampling techniques. Unless specifically approved otherwise, all emissions testing will be conducted following approved USEPA methods. The analytical program for the CPT will follow a written quality assurance project plan (QAPP) that is designed to ensure the collection of representative, high-quality data. A draft of a preliminary CPT plan is provided along with this draft NIC.

5.0 KEY ACTIVITIES AND MILESTONES

Information on key activities and milestones for the flashing furnace project is provided in Table 5-1. The individual dates and milestones provided are not intended to be static and may be revised during the period the NIC is in effect. The individual dates and milestones listed below are not requirements and therefore are not enforceable deadlines. HSAAP is supplying this information as part of the NIC only to inform the public of HSAAP's intentions towards achieving compliance.

TABLE 5-1
KEY ACTIVITIES AND MILESTONES

TASK/MILESTONE	ANTICIPATED DATE
Completion of engineering designs for the flashing furnace system	December 2021
Issuance of purchase order for construction efforts	August 2021
Draft NIC provided to the public	September 2021
Draft CPT plan provided to the public	September 2021
Informal NIC public meeting	October 2021
Submit final NIC	November 2021
Submit RCRA Part B permit modification	November 2021
Submit air permit application	November 2021
Final RCRA permit and air permit approval [1]	November 2022
Initiate on-site construction [2,3]	November 2022
Complete on-site construction	August 2023
Submit final CPT plan [3]	September 2023
Startup of hazardous waste operations [3]	September 2023
Perform CPT [3]	September 2024
Submit Notification of Compliance [3]	December 2024

1 Issuance of the RCRA permit and State air permit to construct is dependent upon TDEC actions and is, therefore, largely outside the control of the HSAAP. HSAAP intends to work with TDEC to expedite the permitting process as much as possible. The schedule provided above anticipates permit issuance within 12 months of each permit application's submittal.

2 HSAAP is committed to the timely installation and operation of this new facility. However, the construction of any waste treatment facility or air emission source is very tightly controlled under each regulatory program to prevent the initiation of construction prior to permit issuance. HSAAP intends to work with TDEC to determine which preparation activities are allowable in advance of permit issuance to minimize the impact of weather delays on the schedule and to ensure that the new thermal treatment facility is constructed as quickly as possible.

3 The initiation of each of these tasks is ultimately tied to permit issuance, which is largely outside the control of the HSAAP. Therefore, the anticipated date for each of these activities has been shown based on the necessary predecessor and the expected duration of that predecessor.

6.0 PUBLIC MEETING AND NOTICE

40 CFR § 63.1210(c) requires that the HSAAP hold at least one informal meeting with the public to discuss anticipated activities described in the draft NIC for achieving compliance with the HWC NESHAP. HSAAP is required to provide public notice of the meeting at least 30 days before the meeting.

6.1 MEETING NOTICE

Figure 6-1 provides a copy of the public notice that will be published in the *Kingsport Times News* and *The Rogersville Review* on September 11, 2021.

In addition to the newspaper notice, HSAAP will provide notice of the public meeting via radio broadcast on WKPT, 1400 AM, and WRZK, 95.9 FM. The radio spot will run on September 11, 2021. Notice of the public meeting will also be provided to all persons on the facility mailing list. A copy of this notice is provided in Appendix A.

6.2 MEETING SUMMARY

A summary of the public meeting will be included with the final NIC.

FIGURE 6-1
PUBLIC NOTICE
NOTICE OF INTENT TO COMPLY AND PRE-APPLICATION MEETING
FLASHING FURNACE
HOLSTON ARMY AMMUNITION PLANT, KINGSPORT, TENNESSEE

PURPOSE OF MEETING

Holston Army Ammunition Plant (HSAAP) intends to install a new flashing furnace thermal treatment system. This public meeting will be held to discuss the proposed thermal treatment system and to discuss plans for compliance with the National Emission Standards for Hazardous Air Pollutants for Hazardous Waste Combustors (HWC NESHAP, 40 CFR 63 Subpart EEE) and with the Resource Conservation and Recovery Act (RCRA) regulations for hazardous waste treatment units. The HWC NESHAP establishes emission limits based on the Maximum Achievable Control Technology for the thermal treatment system. The purpose of this pre-application meeting is to solicit questions from the community and inform the community of the proposed permitting activities.

DATE, TIME, LOCATION OF MEETING

The pre-application meeting will be held on October 14, 2021, 5:30 – 7:00 p.m. at the Holston Business Development Center located at 2005 Venture Park Drive, Kingsport, TN 37660.

BRIEF DESCRIPTION OF FACILITY AND PROPOSED OPERATIONS

Holston Army Ammunition Plant (HSAAP) is a government-owned, contractor-operated facility used for the manufacturing of explosive compounds and formulations. The proposed flashing furnace thermal treatment system will process a portion of the wastes currently treated at the existing open burning ground, including some of the hazardous wastes currently processed at the facility's burn pan unit. HSAAP is located in Hawkins and Sullivan Counties at 4509 West Stone Drive, Kingsport, Tennessee, 37660.

SPECIAL INFORMATION

Copies of the draft HWC NESHAP Notification of Intent to Comply (NIC) containing information about HSAAP's plans for compliance and the draft Comprehensive Performance Test (CPT) Plan are available for viewing on the HSAAP website at https://www.jmc.army.mil/Installations.aspx?id=HolstonProgress. Additionally, copies of the documents can be obtained from Kathy Cole, HSAAP Staff Action Specialist, Phone: 423-578-6285 or Email: kathy.o.cole.civ@mail.mil or via letter at Attn: Kathy Cole, 4509 W. Stone Drive, Kingsport, TN 37660.

CDC guidelines or Federal mandates regarding Covid-19 at the time of the meeting will be followed. An electronic or hard copy of the information presented at the meeting can be requested through the special access statement below if there is a concern with participating in person.

SPECIAL ACCESS STATEMENT & CONTACT INFORMATION

If you have special access needs to participate in the meeting or require further information, please contact Claire Powell, Communications Manager at BAE Systems, at least 72 hours prior to the meeting. Phone: 540.529.5867. Email: claire.h.powell@baesystems.com.

7.0 SUMMARY

BAE intends to install a new HWC for the destruction of hazardous explosive waste and non-hazardous explosive-contaminated waste at the HSAAP. Once operational, this thermal treatment facility will be able to process many of the non-hazardous explosive-contaminated wastes currently treated at the OBG and a portion of the hazardous explosive wastes currently treated in the OBG's BPU. HSAAP intends to operate the flashing furnace in compliance with the applicable requirements of the HWC NESHAP, 40 CFR Part 63 Subpart EEE, and has selected emission control techniques that will ensure that the emission standards are reliably met. HSAAP will operate the flashing furnace using all required process and emissions monitors to ensure that compliance with the HWC NESHAP is achieved at all times. In addition, HSAAP will continue to evaluate and implement waste minimization throughout the facility as possible. HSAAP has developed a schedule for key permitting steps that will allow for HWC NESHAP compliance to be achieved upon startup of the flashing furnace system.

8.0 CERTIFICATION

The following statement is being provided pursuant to 40 CFR § 63.1212(a) and has been signed by the appropriate HSAAP responsible officials, as defined under 40 CFR § 63.2.

> *I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

Facility Owner (United States Army)

Name: **R. Scott Carpenter** ____________________

Title: **LTC, LG, Commanding** **Date:** ____________________

Signature: ____

Facility Operator (BAE Systems, Ordnance Systems, Inc.)

Name: **Jeff Russell** ____________________

Title: **General Manager** **Date:** ____________________

Signature: ____

(This certification will be completed prior to submittal of the final NIC.)

Appendix A:

PUBLIC MEETING NOTICE MAILED TO FACILITY MAILING LIST