



DEPARTMENT OF THE ARMY  
TOOELE ARMY DEPOT  
TOOELE, UT 84074-5000

Div of Waste Management  
and Radiation Control

DEC - 2 2015

November 24, 2015

DSHW-2015-12329

Reply to:

Environmental Office

SUBJECT: Tooele Army Depot Request for Class 3 Permit Modification, Tooele, Utah,  
EPA# 3213820894 ✓

Scott T Anderson  
Utah Department of Environmental Quality  
Division of Waste Management and Radiation Control  
ATTN: Rick Page  
195 North 1950 West  
Salt Lake City, UT 84114-4880

Mr. Anderson

On March 3, 2015, the United States Army (US Army) submitted a test plan for the Ammunition Peculiar Equipment Model 1236M2 (APE 1236M2) deactivation furnace operated at the Tooele Army Depot (TEAD). The furnace is subject to the Resource Conservation and Recovery Act (RCRA) and the Hazardous Waste Combustor National Emission Standards for Hazardous Air Pollutants (HWC NESHAP). Please reference your internal tracking number (DSHW-2015-003790) for copies of this test plan and associated corresponding.

In that test plan, TEAD identified a testing protocol that would establish new operating limits for the incinerator. Some of these limits will result in an increase of more than 25 percent from the current permit limit. Title 40 Code of Federal Regulations (CFR) Part 270.42, Appendix I indicates that such a modification requires a Class3 permit modification. While the submitted test plan served as the trial burn plan required under 40 CFR § 270.42 to establish these new operating limits, TEAD failed to officially make a request for the Class 3 permit modification necessary to adopt the new limitations. This letter serves as that request.

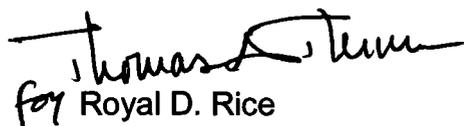
The attached Table 1 provides a comparison between the existing permit limitations and the new limits that are anticipated as a result of the trial burn. Those limits for which we are proposing a modification are shown in **bold** type. The actual limits incorporate into the Permit will be those demonstrated during the test. The method for establishing each permit limit is detailed in the test plan.

A 60 day public comment period on the proposed modifications shall begin on December 1, 2015 and will end at 5:00 PM on January 29, 2016, with a public information meeting scheduled on December 16, 2015 at 5:30 pm to 6:30 pm in Rm 159 of the Utah State University extension office at 1021 Vine Street in Tooele Utah.

Publication of the public notice in the local newspaper is scheduled for December 1, 2015. This modification request will also be mailed out to all persons on the mailing list within 7 days of this request.

If you have any questions or concerns, please contact Mr. Nicholas Montgomery at (435) 833-2761 or via email at [nicholas.d.montgomery2.civ@mail.mil](mailto:nicholas.d.montgomery2.civ@mail.mil).

Respectfully,

A handwritten signature in black ink, appearing to read "Thomas A. Rice". The signature is written in a cursive style with a horizontal line above the name.

for Royal D. Rice  
Chief, Engineering and Environmental

**Table 1  
Comparison of Existing and Proposed Permit Limitations**

<b>Parameter</b>	<b>Permit Condition</b>	<b>Current Limit</b>	<b>Proposed Limit</b>
Maximum kiln exit temperature	IV.D.1	680°F	680°F
Minimum kiln rotation	IV.D.2	1 rpm	1 rpm
Maximum kiln rotation	IV.D.2	3 rpm	3 rpm
Maximum kiln pressure	IV.D.3	0.0 in. w.c. (5 second delay)	0.0 in. w.c. (5 second delay)
<b>Minimum afterburner temperature</b>	<b>IV.D.4</b>	<b>1,611°F, HRA</b>	<b>1,600°F, HRA</b>
<b>Maximum afterburner temperature</b>	<b>IV.D.4</b>	<b>1,811°F, HRA</b>	<b>1,825°F, HRA</b>
Maximum stack gas CO concentration	IV.D.5	100 ppmv @ 7% O <sub>2</sub> , HRA 500 ppmv @ 7% O <sub>2</sub> , 60-sec	100 ppmv @ 7% O <sub>2</sub> , HRA 500 ppmv @ 7% O <sub>2</sub> , 60-sec
<b>Minimum baghouse inlet temperature</b>	<b>IV.D.6</b>	<b>750°F, HRA</b>	<b>700°F, HRA</b>
<b>Maximum baghouse inlet temperature</b>	<b>IV.D.6</b>	<b>1,048°F, HRA</b>	<b>1,050°F, HRA</b>
Minimum baghouse pressure drop	IV.D.7	3.5 in. w.c.	3.5 in. w.c.
<b>Maximum combustion gas velocity</b>	<b>IV.D.8</b>	<b>45 fps, HRA</b>	<b>60 fps, HRA</b>
<b>Maximum PEP feed rate</b>	<b>IV.D.9</b>	<b>56 lb/hr</b>	<b>240 lb/hr</b>
<b>Maximum PM generation</b>	<b>IV.D.10</b>	<b>66 lb/hr</b>	<b>66 lb/hr</b>
<b>Maximum chloride feed rate</b>	<b>IV.D.11</b>	<b>2.2 lb/hr</b>	<b>2.2 lb/hr</b>
<b>Maximum semivolatile metals feed rate</b>	<b>IV.D.12.a.</b>	<b>0.22 lb/hr</b>	<b>1.0 lb/hr</b>
<b>Maximum low volatile metals feed rate</b>	<b>IV.D.12.b</b>	<b>0.25 lb/hr</b>	<b>1.0 lb/hr</b>
<b>Maximum barium feed rate</b>	<b>IV.D.12.c</b>	<b>19.13 lb/hr</b>	<b>19.13 lb/hr</b>
Maximum mercury feed rate	IV.D.12.d	0.0 lb/hr	0.0 lb/hr