

14 February 2017

Mr. Patrick Flood, Director
Division of Solid Waste Management
William R. Snodgrass Tower
312 Rosa L. Parks Avenue, 14th Floor L&C Tower
Nashville, TN 37243

Subject: Open Burning Unit (TND98-102-6594) Interim Status Limits Request

Dear Mr. Flood,

Kilgore Flares Company, LLC, a part of the Chemring Group, is formally requesting a temporary authorization to increase its open burn unit capacity from 5,000 to 7,500 pounds per week. The current increase was previously granted in August 2016, and expiring March 3, 2017. The previous extensions were based upon expectation that the facility would have been permitted with a permanent approved increase in burn capacity of 16,500 pounds per week. As you are aware, the Part B permit application is still under review by your department; further, the meeting in July of 2015 required significant changes from USEPA for the risk dispersion model protocols which had been previously approved by TDEC. We have addressed those changes and submitted a work plan. The work plan has been implemented and the Environmental Performance Standard Demonstration Report has been submitted. We have worked closely with TDEC and made good progress. It is now expected that our permit will be issued in the second half of 2017.

It is vital to our ability to maintain our operation that we are able to continue to burn at the rate of 7,500 pounds per week, and even that amount is currently a constraint to our ability to meet our obligations to our customers, including the Department of Defense. For this reason, we are seeking authorization to burn up to 7,500 pounds per week until such time as the Part B Permit is issued. Alternately, we are requesting an increase of up to 7,500 pounds until August 31, 2016, with a 180-day extension option.

In reviewing this request we respectfully ask you to consider the following:

- Kilgore has been safely operating under a series of temporary authorizations at this increased rate since 2011 without any risk to human health or the environment.
- The actual explosive content of the scrap waste is much lower than the burn amount, as most of the waste burned is diesel fuel, used to desensitize the waste, and contaminated debris.

- Since your last authorization, we have received comments on the work plan, incorporated those comments, conducted test burns and submitted the Environmental Performance Standard Demonstration Reports for review.
- There is limited offsite capacity for processing this waste in the United States, and the waste must be scheduled into these facilities at their convenience. Therefore our continued ability to meet the 90-day generator accumulation rules for this waste would be stressed.
- Currently, the cost for offsite disposal of the waste is \$8.16 per pound with a projected increase of 9%, as stated via a letter from the vendor. Multiplying this cost by our monthly scrap rate would cause Kilgore to incur approximately \$929,000 in increased operating cost per year. This is a significant, unnecessary additional cost to our operations given our proven ability to comply with the terms and conditions of previously-issued authorizations to burn at a rate of 7,500 pounds per week.
- We strongly believe that processing this waste onsite at our facility, under the control of our trained operators, is safer than the option of transporting the waste in public commerce for offsite treatment.

If you have any questions or comments please contact Mr. Charles McDowell, Environmental Manager of Kilgore Flares (731) 228-5240 or the undersigned at (731) 228-5331.

Sincerely,



Ron Kunkle
Vice President Health, Safety and Environmental
Chemring Countermeasures USA
(Kilgore Flares/Alloy Surfaces)



State of Tennessee
Department of Environment and Conservation
Division of Solid Waste Management
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 14th Floor
Nashville, TN 37243

RESET CALCULATIONS

RESET ENTIRE FORM

RETURN FORM
AND FEES TO
THIS ADDRESS

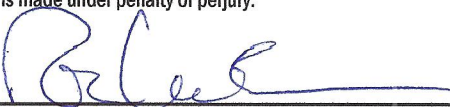
TSDf-APP

DATE FILED

2/14/17

**TREATMENT, STORAGE, DISPOSAL FACILITY (TSDf)
APPLICATION AND OTHER REVIEW FEES**

EPA ID TND007020159		SITE, BUSINESS, OR INSTALLATION NAME Kilgore Flares Company, LLC					
CONTACT PERSON LAST NAME McDowell		FIRST NAME Charles	PHONE 731-228-5240	FAX	E-MAIL cmcdowell@kilgoreflares.com		
NON PERMITTED FACILITY		SITE ACTIVITY		PERMITTED FACILITY			
<input type="checkbox"/> APPLYING FOR PERMIT		STORAGE <input type="checkbox"/> ON-SITE <input type="checkbox"/> COMMERCIAL		<input checked="" type="checkbox"/> INTERIM STATUS			
<input type="checkbox"/> PERMIT RENEWAL		TREATMENT <input checked="" type="checkbox"/> ON-SITE <input type="checkbox"/> COMMERCIAL		<input type="checkbox"/> FULLY PERMITTED			
<input type="checkbox"/> GENERATOR		DISPOSAL <input type="checkbox"/> ON-SITE <input type="checkbox"/> COMMERCIAL		<input type="checkbox"/> CORRECTIVE ACTION			
<input type="checkbox"/> OTHER		LANDFILL <input type="checkbox"/> ON-SITE <input type="checkbox"/> COMMERCIAL		<input type="checkbox"/> CLOSURE / POST CLOSURE			
				<input type="checkbox"/> OTHER ENFORCEABLE DOCUMENT			
CALCULATING YOUR FEES							
IF FILING A SINGLE APPLICATION WITH TWO OR MORE TYPES OF UNITS, COMPUTE YOUR TOTAL BY USING THE HIGHER FEE (OR JUST ONE SET) FOR THAT APPLICATION. EXAMPLE: IF YOU HAVE STORAGE AND DISPOSAL, THE HIGHER PART B FEE APPLIES. 1) SELECT >> "EXISTING" OR "NEW" PART A FEE 2) SELECT >> "ON-SITE" OR "COMMERCIAL" DISPOSAL PART B FEE							
APPLICATION TYPE	LINE	PART	TYPE OF FEE	FEE AMOUNT	# APPLYING FOR	LINE TOTAL	GROUP TOTAL
STORAGE	1	A	<input type="checkbox"/> EXISTING FACILITY	\$600	0	1 0.00	\$ 0.00 STORAGE - 514
	2	A	<input type="checkbox"/> NEW FACILITY	\$2,800	0	2 0.00	
	3	B	<input type="checkbox"/> ON-SITE	\$15,000	0	3 0.00	
	4	B	<input type="checkbox"/> COMMERCIAL	\$37,500	0	4 0.00	
TREATMENT	1	A	<input type="checkbox"/> EXISTING FACILITY	\$600	0	1 0.00	\$ 0.00 TREATMENT - 516
	2	A	<input type="checkbox"/> NEW FACILITY	\$2,800	0	2 0.00	
	3	B	<input type="checkbox"/> ON-SITE	\$15,000	0	3 0.00	
	4	B	<input type="checkbox"/> COMMERCIAL	\$37,500	0	4 0.00	
DISPOSAL	1	A	<input type="checkbox"/> EXISTING FACILITY	\$600	0	1 0.00	\$ 0.00 DISPOSAL - 511
	2	A	<input type="checkbox"/> NEW FACILITY	\$2,800	0	2 0.00	
	3	B	<input type="checkbox"/> ON-SITE	\$30,000	0	3 0.00	
	4	B	<input type="checkbox"/> ON-SITE LANDFILL	\$30,000	0	4 0.00	
	5	B	<input type="checkbox"/> COMMERCIAL DISPOSAL	\$75,000	0	5 0.00	
	6	B	<input type="checkbox"/> COMMERCIAL LANDFILL	\$75,000	0	6 0.00	
POST CLOSURE	1	A	<input type="checkbox"/> EXISTING FACILITY	\$600	0	1 0.00	\$ 0.00 POST CLOSURE - 548
	2	A	<input type="checkbox"/> NEW FACILITY	\$2,800	0	2 0.00	
	3	B	<input type="checkbox"/> PREV PERMITTED UNDER OPERATING PERMIT	\$15,000	0	3 0.00	
	4	B	<input type="checkbox"/> NOT PREV PERMITTED UNDER OPERATING PERMIT	\$30,000	0	4 0.00	
CORRECTIVE ACTION	1	A	<input type="checkbox"/> EXISTING FACILITY	\$600	0	1 0.00	\$ 0.00 COR ACT - 547
	2	A	<input type="checkbox"/> NEW FACILITY	\$2,800	0	2 0.00	
	3	B	<input type="checkbox"/> APPLICATION	\$15,000	0	3 0.00	
OTHER	1	B	<input type="checkbox"/> EMERGENCY PERMIT	\$2,400	0	1 0.00	\$ 0.00 OTHER - 516
	2	B	<input type="checkbox"/> R D and D <input type="checkbox"/> R D and D RENEWAL	\$2,800	0	2 0.00	
CLOSURE POST-CLOSURE PLAN REVIEWS	1		<input type="checkbox"/> CLOSURE / POST CLOSURE PLAN REVIEW	\$2,800	0	1 0.00	\$ 0.00 CLOS/POST CLOS PLAN REVW - 548
	2		<input type="checkbox"/> CLASS 1 MODIFICATION OF PLAN	\$300	0	2 0.00	
	3		<input type="checkbox"/> CLASS 1 MODIFICATION OF PLAN	\$850	0	3 0.00	
	4		<input type="checkbox"/> CLASS 2 MODIFICATION OF PLAN	\$1,100	0	4 0.00	
	5		<input type="checkbox"/> CLASS 3 MODIFICATION OF PLAN	\$1,700	0	5 0.00	

EPA ID TND007020159		SITE, BUSINESS, OR INSTALLATION NAME Kilgore Flares Company, LLC				
APPLICATION TYPE	LINE	TYPE OF FEE	FEE AMOUNT	# APPLYING FOR	LINE TOTAL	GROUP TOTAL
PERMIT MODIFICATION	1	<input type="checkbox"/> CLASS 1	\$600	0	1 0.00	\$ 3,000.00 PERMIT MOD- 513
	2	<input type="checkbox"/> CLASS ¹	\$4,200	0	2 0.00	
	3	<input type="checkbox"/> CLASS ¹ OWNER/OPERATOR CHANGE	\$3,800	0	3 0.00	
	4	<input type="checkbox"/> CLASS ¹ M.A.C.T.	\$8,000	0	4 0.00	
	5	<input type="checkbox"/> CLASS 2 CONTAINER, TANK, DRIP PAD STORAGE AND / OR TREATMENT UNIT OR THERMAL TREATMENT UNIT	\$9,700	0	5 0.00	
	6	<input type="checkbox"/> CLASS 2 DISPOSAL UNIT; WASTE PILE STORAGE UNIT; CONTAINMENT BLDG; SURFACE IMPOUNDMENT; AND / OR TREATMENT UNIT OR OTHER MISCELLANEOUS UNIT	\$12,500	0	6 0.00	
	7	<input type="checkbox"/> CLASS 2 POST CLOSURE UNIT	\$15,000	0	7 0.00	
	8	<input type="checkbox"/> CLASS 3 CONTAINER, TANK, DRIP PAD STORAGE AND / OR TREATMENT UNIT OR THERMAL TREATMENT UNIT	\$15,000	0	8 0.00	
	9	<input type="checkbox"/> CLASS 3 DISPOSAL UNIT; WASTE PILE STORAGE UNIT; CONTAINMENT BLDG; SURFACE IMPOUNDMENT; AND/OR TREATMENT UNIT OR OTHER MISCELLANEOUS UNIT	\$30,000	0	9 0.00	
	10	<input type="checkbox"/> CLASS 3 FINAL REMEDIES UNDER CORRECTIVE ACTION	\$15,000	0	10 0.00	
	11	<input type="checkbox"/> CLASS 3 POST CLOSURE UNIT	\$20,000	0	11 0.00	
	12	<input checked="" type="checkbox"/> TEMPORARY AUTHORIZATION	\$3,000	1	12 3,000.00	
	13	<input type="checkbox"/> TEMPORARY AUTHORIZATION RENEWAL	\$300	0	13 0.00	
BURN AND / OR ASSESSMENT REVIEW	1	<input type="checkbox"/> TRIAL BURN EACH TYPE OF UNIT	\$11,700	0	1 0.00	\$ 0.00 BURN AND RISK- 544
	2	<input type="checkbox"/> RISK BURN PLAN EACH TYPE OF UNIT	\$11,700	0	2 0.00	
	3	<input type="checkbox"/> CERTIFICATE OF COMPLIANCE EACH UNIT	\$5,000	0	3 0.00	
	4	<input type="checkbox"/> FACILITY RISK ASSESSMENT AND/OR RISK EVALUATION PLAN FOR A LAND BASED UNIT	\$11,700	0	4 0.00	
	5	<input type="checkbox"/> FACILITY RISK ASSESSMENT AND/OR RISK EVALUATION PLAN FOR COMBUSTION UNIT	\$11,700	0	5 0.00	
	6	<input type="checkbox"/> INITIAL DISPERSION MODEL AND DIRECT HUMAN HEALTH RISK ASSESSMENT	\$11,700	0	6 0.00	
	7	<input type="checkbox"/> PERIODIC MODELING AND DIRECT HUMAN HEALTH RISK ASSESSMENT	\$5,850	0	7 0.00	
OTHER REVIEWS	1	<input type="checkbox"/> VARIANCE OR WAIVER REQUEST	\$3,000	0	1 0.00	\$ 0.00 OTHER REVIEWS - 576
	2	<input type="checkbox"/> VARIANCE OR WAIVER REQUEST RENEWAL	\$650	0	2 0.00	
	3	<input type="checkbox"/> CHROMIUM EXCLUSION EACH Cr WASTE STREAM	\$2,500	0	3 0.00	
	4	<input type="checkbox"/> CONTAINED-IN DETERMINATION	\$500	0	4 0.00	
REG REVIEW	1	<input type="checkbox"/> OFFICIAL WRITTEN REGULATORY INTERPRETATION REQUEST PER HOUR	\$50	0	1 0.00	\$ 0.00 REG REVIEWS - 577
CONSTRUCTION INSPECTION FEES <small>*APPLIES ALSO TO NEWLY PERMITTED UNITS NOT YET CONSTRUCTED PAYABLE PRIOR TO CONSTRUCTION</small>	1	<input type="checkbox"/> CLASS 1 MOD STORAGE UNIT	\$300	0	1 0.00	\$ 0.00 CONST INSPECT - 604
	2	<input type="checkbox"/> CLASS 1 MOD TREATMENT, DISPOSAL, POST CLOSURE	\$550	0	2 0.00	
	3	<input type="checkbox"/> CLASS ¹ MOD STORAGE UNIT	\$1,300	0	3 0.00	
	4	<input type="checkbox"/> CLASS ¹ MOD TREATMENT, DISPOSAL, POST CLOSURE	\$2,700	0	4 0.00	
	5	<input type="checkbox"/> CLASS 2 MOD STORAGE UNIT	\$2,000	0	5 0.00	
	6	<input type="checkbox"/> CLASS 2 MOD TREATMENT, DISPOSAL, POST CLOSURE	\$4,000	0	6 0.00	
	7	<input type="checkbox"/> *CLASS 3 MOD STORAGE UNIT	\$2,700	0	7 0.00	
	8	<input type="checkbox"/> *CLASS 3 MOD TREATMENT, DISPOSAL, POST CLOSURE	\$5,350	0	8 0.00	
CERTIFICATION I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.				TOTAL PAY THIS AMOUNT \$3,000.00 SUM GROUP TOTALS Pg 1 and 2 MAKE PAYABLE TO: "TREASURER, STATE OF TENNESSEE"		
 SIGNATURE OF AUTHORIZED REPRESENTATIVE		RON KUNKLE PRINTED NAME and TITLE		2/14/16 DATE		