

We have the following comments on the Holston Army Ammunition Plant (HSAAP) Area B Title V renewal located in Kingsport, Tennessee, permit number 568188. We provide our comments to help strengthen the permit, that the permit will provide necessary information so the basis for the permit decisions is transparent and readily accessible to the public, and the record provides adequate support for the decisions. EPA looks forward to continue to work with Tennessee to address citizen concerns regarding the open burning of hazardous and non-hazardous wastes at HSAAP Area B.

General Comments:

1. HSAAP open burns both cage and pile waste. The permit does not require the facility to characterize, document, or record material burned in these waste streams. However, the permit does restrict the types, and in some cases, the amount of waste burned. These restrictions do not have associated compliance methods. The facility should record and characterize the type and amount of waste burned in the following relevant conditions to ensure compliance and to determine the applicability of standards:
 - a. Source 37-0028-10, Open Burning of Explosive Contaminate Materials, Conditions E5-5 through E5-7 and E5-10.
 - b. Source 37-0028-53, Open Burning of Explosive Waste, Conditions E26-3, E26-5 through E26-7, and E26-10.
2. HSAAP open burns concrete, construction material, piping, and soil as pile waste. Given the nature of the facility and age of the buildings that are being decommissioned, these materials may contain lead and asbestos. If asbestos materials are present, the permit should contain applicable federal standards, including 40 CFR 61 Subpart M National Emission Standards for Asbestos. Clean Air Act standards for lead emissions from solid waste combustion depend on whether the solid waste is characterized as hazardous waste or non-hazardous waste. Non-hazardous solid waste combustion is subject to regulation under section 129 of the Clean Air Act. Combustion of solid hazardous waste is subject to the hazardous waste combustion National Emission Standards for Hazardous Air Pollutants at 40 CFR 63. The overarching lead National Ambient Air Quality Standard (NAAQS) standard is $0.15 \mu\text{g}/\text{m}^3$.
3. EPA suggests additional compliance methods for the following sources:
 - a. Three of the four coal fired boilers in source 37-0028-01-04 are equipped with a fabric filter and one with an electrostatic precipitator. Condition E4-10 requires compliance with the particulate matter limit as best management and maintenance practices. EPA recommends that the permit include monitoring the pressure drop of the fabric filters to provide ongoing compliance, or include direct particulate measurement. Appropriate parametric monitoring of the electrostatic precipitator should also be added.
 - b. Sources 37-0028-98 and 37-0028-104 have fabric filters. The permit should include appropriate monitoring, such as parametric monitoring of the pressure

drop of the fabric filters and requirements for the pressure drop to be maintained within a specified range, to provide ongoing compliance of particulate matter requirements.

- c. Sources 37-0028-12 through -20, -28, -67, -78, and -77 have scrubbers for controls. Appropriate monitoring, such as additional parametric monitoring of the scrubbers and the scrubber flow rate, should be added, such as that found in Condition E58-2.

Specific Comments

4. Condition E4-4 contains place holder language for 40 CFR 63 Subpart DDDDD. This regulation was finalized on September 14, 2016. Condition E4-4 should be updated to contain all relevant and current regulatory requirements.
5. Units subject to 40 CFR 63 Subpart DDDDD must meet the emission limits outlined in 40 CFR §63.7500 and Table 2 of the regulation for hydrogen chloride, mercury, and filterable particulate matter. The particulate matter and hydrogen chloride (HCl) emissions limits and compliance methods in Condition E4-10 and E4-13 should incorporate the appropriate regulatory emission standards from 40 CFR Subpart DDDDD. Appropriate limits for mercury should also be added.
6. The visible emission (VE) standards required by TAPCR 1200-3-05-.1(1) are listed as applicable requirements under all of the source specific units in Section E; with the exception of Source 37-0028-10, *Open Burning of Contaminated Materials*, and Source 37-0028-53, *Open Burning of Explosive Waste*. These operations are not listed in the table in section E3-3 as sources not requiring a VE reading and appear to be subject to the VE requirements listed in the Section D, *General Applicable Requirements*. Given this format, however, there is no compliance method for the VE standard for these sources, and, hence, it will be difficult to determine compliance with the VE standard for these operations. EPA recommends that the Title V permit include a compliance or monitoring methodology and reporting requirements for these sources to determine compliance with the VE standards when these sources are in operation.
7. Conditions E5-5 is written as a limiting condition on the open-burning of explosive contaminated waste shipped to HSAAP, indicating:

“This permit does not, and shall not be construed to authorize Holston Army Ammunition Plant to open burn explosive contaminated wastes which were shipped to Holston Army Ammunition Plant for the purpose of disposal....”

However, the condition then explicitly allows the burning of shipped wastes, indicating:

“except when such burning must be conducted to safely dispose of this material.”

Given that HSAAP currently uses open burning as the primary means of disposing of explosive contaminated waste, the condition appears to both prohibit and authorize the shipment of such waste for the purpose of disposal and open burning. In addition, the condition allows the open burning of explosive contaminated waste shipped to HSAAP for the purpose of disposal “when such burning must be conducted to safely dispose of this material,” whereas, the applicable state regulations prohibit open burning, except for certain categories of explosive materials, “where no other safe means of disposal exists,” the later condition being more restrictive (TAPCR 1200-03-04-.04(k)). The act of shipping the explosive contaminated materials to HSAAP for disposal would appear to allow for safe shipment of such material to a facility with a Defense Explosive Safety Board approved decontamination system as a safe means of disposal. Finally, the citation to TAPCR 1200-03-19-.05 appears to be an administrative error, as the provisions in the referenced rule section concern reasonable available control technology (RACT). EPA recommends that condition E5-5 be revised to more clearly state the limiting condition and to include the relevant citation of the applicable requirement.

8. Condition E21-4 requires source testing for the NO_x emission limit without specifying a source test frequency or an applicable test method. The permit should define a frequency for source testing and reporting, and specify the appropriate test methods.
9. Conditions for Source 37-0028-112 include a flare and reference 40 CFR §60.18(c)(1) and (2). The regulation 40 CFR §60.18(c)(6)(d) appears to also be applicable, “Owners or operators of flares used to comply with the provisions of this subpart shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. Applicable subparts will provide provisions stating how owners or operators of flares shall monitor these control devices.” The permit should incorporate requirements to monitor the control device, consistent with the provisions.
10. Condition E61-10 references testing found in 40 CFR 60.704 and 40 CFR 60.664; the provision outlined in 40 CFR 60.482-1a may also be applicable. All relevant regulations should be incorporated into the Title V permit.
11. Source Description 37-0028-113 and Condition E62-13 state that 40 CFR 60 Subpart KKKK is applicable. Condition E62-13 refers the permittee to attachments 18, 20, and 21 for applicable regulatory requirements. 40 CFR 60 Subpart KKKK is not included in any of the attachments. If this regulation is no longer applicable the reference should be removed from the permit body; otherwise, the applicable regulations should be incorporated at some place in the permit. EPA recommends that all justifications regarding applicability be provided in the statement of basis.
12. Condition E63-2 limits the particulate matter from the G-8 Nitration Process. This condition does not contain any compliance methods. Methods including recordkeeping and recording should be added to ensure the 0.2 grain per dry standard cubic foot limit is met.

Typographic and Editorial Recommendations

1. EPA Region 4's Air and EPCRA Enforcement Branch has been renamed as the Air Enforcement and Toxics Branch. EPA recommends that Conditions B6 and E2 be updated to reflect this change.
2. Condition E4-18 references TAPCR 1200-03-05-.03(8). This regulatory citation does not exist and should be updated.
3. Condition E64-1 references Condition E63-2. EPA suggests that this condition be changed to reference Condition E64-2.
4. Condition E66-11 refers to Condition E66-2 twice. EPA recommends one of those references be removed.
5. The applicable regulations from 40 CFR 63 Subpart ZZZZ are incorporated for source 37-0028-117. Condition E66-11(b) includes a table for management practices. This condition references 40 CFR§63.6603(a) and Table 2c. EPA recommends changing this reference to Table 2d.
6. Condition E66-20 references the applicable emission standards for engines subject to 40 CFR 60, Subpart IIII and attachment 1. Attachment 1 is the Opacity Matrix Decisions Trees, and is most likely not the correct reference. It is unclear if a reference to an attachment is needed for this condition.