



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

October 18, 2019

Darrell Elliott, Director
Environmental Management Office
U.S. Army Ammunition Plant
1 C Tree Road
McAlester, OK 74501-9002

Re: Notice of Deficiency – Tier II Permit Modification for Vertical Expansion
McAlester Army Ammunition Plant, New Landfill
Pittsburg County
Solid Waste Permit No.: 3561014

NOTICE OF DEFICIENCY

Dear Mr. Elliott:

The Oklahoma Department of Environmental Quality (DEQ) received the subject Application under cover letter dated September 4, 2019. The Application was prepared by All Consulting on behalf of McAlester Army Ammunition Plant (McAAP) for the non-hazardous industrial waste (NHIW) landfill. A revised legal description (page 2 of the Application) was submitted via electronic mail on September 10, 2019.

The Application was processed as a Tier II Modification for a capacity increase exceeding 25% at an on-site facility in accordance with OAC 252:4-7-58 and 59. Legal notice of filing was published in the McAlester News-Capital on September 18, 2019. The affidavit of publication for the legal notice was received by DEQ on September 27, 2019, within 20 days of the date of publication.

DEQ has completed an administrative and technical review of the Application and has identified the following deficiencies:

1. The Application includes a proposed expansion of the permit boundary, but no expansions of the waste boundary are proposed. Oklahoma Administrative Code (OAC) 252:515-5-31 and 51 include restrictions on the location of permit boundaries that were not addressed in the Application. Please provide demonstrations that the proposed permit boundary meets these requirements. Alternatively, McAAP may reduce the permit boundary to the currently-approved state and provide revised drawings and legal description.
2. The Application proposes final cover consisting of 2.5 feet of compacted clay overlain by 6 inches of topsoil. In accordance with OAC 252:515-19-53(a), the erosion layer must consist of at least 12 inches of soil capable of sustaining plant growth. Alternatively, per



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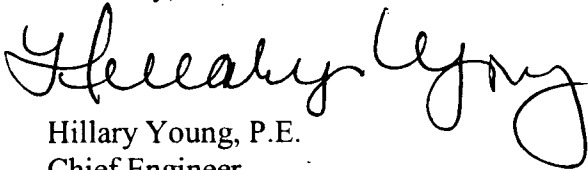
OAC 252:515-19-53(c), DEQ may approve the use of an alternative final cover design upon demonstration the alternative provides protection equivalent to the prescriptive design. Please either correct this specification in the Application or provide a demonstration that the proposed design provides equivalent protection.

3. The Application states that the borrow area will be reshaped and revegetated to blend with surrounding terrain within 180 days of the date the area ceased being used in accordance with OAC 252:515-19-55. Appendix 5, Figure 5-1 depicts a proposed borrow area final grading that is below surrounding grade and may result in ponding during rainfall events. Is this area intended to function as a natural pond/depression, or will this area be further reshaped to promote stormwater drainage?
4. Appendix 9, Section B states that the barrier layer will have a hydraulic conductivity of no greater than 1.0×10^5 cm/sec. Please correct this to 1.0×10^{-5} cm/sec.
5. Section 7.1 states that no surface water monitoring program is necessary at the landfill, while the operational plan states that surface water monitoring will be conducted in accordance with McAAP's Oklahoma Pollutant Discharge Elimination System (OPDES) permit. Please clarify this discrepancy.

It is noted that Appendix 6 of the Application includes a Groundwater Monitoring Program describing how groundwater samples will be collected and analyzed, but a statistical analysis plan is not included. Unless otherwise requested, McAAP's Statistical Analysis Plan approved on October 31, 1997 will remain in effect.

Please address the above items and send a response to DEQ. Should you have any questions, please contact Jeff Biddick at (405) 702-5141.

Sincerely,



Hillary Young, P.E.
Chief Engineer
Land Protection Division

HY/jb