United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Partial Compliance Evaluation
Lake City Army Ammunition Plant
25201 East 78 Highway
Independence, Missouri 64051
FRS# 110042063021

Inspection Date(s):
September 24-25, 2024

CHARLOTTE PAPP
Digitally signed by CHARLOTTE PAPP
Date: 2025.02.21 13:29:01 -06'00'

Charlotte Papp, Inspector, ECAD, Air Branch

Authorized for Release by:

JODI BRUNO
Digitally signed by JODI BRUNO
Date: 2025.02.24 10:40:01 -06'00'

Jodi Bruno, Air Branch Manager, ECAD

11201 Renner Boulevard
Lenexa, Kansas 66219

CONTENTS

INSPECTION OVERVIEW 3
  INSPECTION OBJECTIVE 3
  FACILITY CONTACT INFORMATION 3
  FACILITY OVERVIEW 4
  FACILITY OPERATIONS SUMMARY 4
  FIELD ACTIVITIES SUMMARY 5
INSPECTION OBSERVATIONS AND POTENTIAL FINDINGS 5

TABLES

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS 3
Table 2. PROJECT TEAM MEMBERS 3
Table 3. FACILITY CONTACT INFORMATION 3

APPENDICES

A – Confidential Business Information Form (2 pages)
B – Receipt for Documents (5 pages)

This Contents page shows all the sections contained in this report and provides a clear indication of the end of this report.

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the partial compliance evaluation (PCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements listed in **Table 1**. The inspection was part of the U.S. Environmental Protection Agency's (EPA) core program.

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS

Code of Federal Regulation	Standard Name
40 CFR Part 63	Subpart EEE - National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors
40 CFR Part 63	Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

Table 2 lists the inspection team members.

Table 2. PROJECT TEAM MEMBERS

Team Member	Organization	Project Role
Charlotte Papp	EPA Region 7, ECAD, Air Branch	Lead inspector - CAA
Trevor Urban	EPA Region 7, ECAD, RCRA	Lead inspector - RCRA
Daniel Simmons	Missouri Department of Natural Resources	Field team member

FACILITY CONTACT INFORMATION

Table 3 lists the primary facility contacts alphabetically by last name.

Table 3. FACILITY CONTACT INFORMATION

Name, Title	Phone No.	Email Address
Tonya L. Aggson, Environmental Manager	816-656-1696	tlaggson@olinlc.com
Jaime Allison, Vice President of Operations	Closing conference only	
Brian Batliner, R3 Group Supervisor	Closing conference only	
Denise Bricker, EH&S Director	816-656-1731	DMBricker@olinlc.com
Carmen Brock, Environmental Engineer	816-507-8962	cmbrock@olinlc.com
Eric Couch, R3 Group Operator	Closing conference only	
Kelly Hester, Environmental Coordinator	816-796-7152	kelly.j.hester.civ@army.mil
Adam Hinsdale, Deputy to the Commander	Closing conference only	
Brian Huckabay, Olin Winchester	Closing conference only	

Lieutenant Colonel Brian Jones, Commander, U.S. Army	Closing conference only	
Dalton Kenig, Environmental Engineer	816-819-4510	dkenig@onlinlc.com
Mike Stock, Olin/Winchester	Closing conference only	

FACILITY OVERVIEW

Lake City Army Ammunition Plant (LCAAP) is a federal facility located in Independence, Missouri. LCAAP is a government owned, contract-operated military industrial installation under the jurisdiction of the U.S. Army Industrial Operations Command. Olin Winchester, LLC, is the current contract operator of the facility and took over operations on October 1, 2020. However, Alliance Techsystems Operations, LLC (ATO)/Northrop Grumman Corporation (NGC) continues as the contract operator of the 20mm production function in Building 65 at the facility. LCAAP has approximately 1,600 employees and operates 24-hours per day, 7 days per week, utilizing multiple daily shifts. The munitions operations are currently operating 24-hours per day, 5 days per week (Monday – Friday). The incinerator operates 24-hours per day, 5 days per week (Monday – Friday).

The last onsite compliance monitoring activity at the facility was on June 19, 2024, and consisted of a PCE (stack test) conducted by the Missouri Department of Natural Resources (MoDNR). According to the Enforcement and Compliance History Online (ECHO) database, this performance test had mixed results of passing and failing.

According to LCAAP's Title V operating permit issued by MoDNR on November 1, 2021, the facility is subject to the regulations and standards subject to review during this inspection as noted in **Table 1.**

FACILITY OPERATIONS SUMMARY

The facility manufactures several types of small ammunition. This CAA inspection focused on the incineration process. Waste is taken to the incinerator via totes and other small containers. Waste is then fed by hand into the incinerator hopper where it is weighed and brought onto the primary, then secondary conveyor systems. If the weight, flow, and mix of waste is appropriate, the conveyor gate arm will open, and waste will be fed into the four-chambered rotary kiln for incineration. Exhaust gasses from the incineration process are vented to an afterburner, evaporative cooler, powdered activated carbon (PAC) injection, baghouse, then finally released to the atmosphere. All process areas within the incineration unit are monitored continuously. Feed rates of waste into the incinerator are monitored and controlled. Different "recipes" (operating parameters, flow rates, and mixes of waste quantities) are used to ensure adequate combustion of materials.

FIELD ACTIVITIES SUMMARY

Trevor Urban and I arrived at the facility on September 24, 2024, at approximately 9:15 a.m. and completed a drive by surveillance inspection. I did not observe visible emissions. We made entry at the security office where we were met by Denise Bricker who escorted us into the facility. I introduced myself and members of the inspection team, presented my credentials, and provided my business card to facility staff listed in Table 3. I was given a facility safety briefing by Tonya Aggson. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 1**. I explained that after asking for some general business information, I would observe the incinerator with associated control devices and review associated records demonstrating compliance with the regulations. I explained to Ms. Bricker that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection and provided her with a Confidential Business Information (CBI) form. Ms. Bricker did not make a claim of confidentiality (**Appendix A**).

The inspection team was given a facility tour. I was asked to wear the following PPE for general site safety: safety glasses, hearing protection, and steel-toed boots. We began the tour at the incinerator at 11:32 a.m. We remained at the incinerator until we broke for lunch at approximately 1:00 p.m. We reconvened at 1:50 p.m. at which time the RCRA inspection group split off from the CAA inspection group. The RCRA inspection group continued with a site tour while the CAA inspection group reviewed records in the conference room. We departed the facility at approximately 4:15 p.m.

I obtained copies of the records as indicated on the Receipt for Documents (**Appendix B**).

Trevor Urban returned to the site the following day (September 25, 2024) to conclude onsite activities. He led the closing conference onsite while I joined remotely. The closing conference began at 2:00 p.m. with facility members listed in Table 3. I provided the facility with copies of the Small Business Resources Information Sheet. We discussed preliminary observations and outstanding documents that were requested to be sent digitally. On October 1, 2024, I received all requested documents via a OneDrive folder. The closing conference concluded at 2:50 p.m.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions, and field activities were documented in the field records. No photographs were deemed necessary to complete this inspection, thus none were taken while onsite to accommodate security concerns. I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

According to Ms. Bricker, the facility does not melt any metal onsite, nor use any furnaces for that purpose. Thus, 40 CFR Part 60 Subpart N requirements do not apply.

40 CFR Part 63 Subpart EEE requires LCAAP to operate their Explosive Waste Incinerator (EWI) within operating parameters established from performance test results and specified within their Title V permit. While onsite, I observed the active values (e.g. temperature, pressure, flow rate), and all values were within the specified operating parameters. I requested historic data of these operating parameters and reviewed examples. Within the data I reviewed, the incinerator appeared to be operating within the specified parameters.

This subpart also requires that the EWI have an automatic waste feed shutoff system in place, and the facility permit likewise specifies what the limits for the shutoff system are to be. While onsite, I observed the values used for the automatic waste feed shutoff system. All values were within the range specified in the permit.

This subpart requires that a certified operator must be on duty at all times and likewise has training requirements for staff who operate the incinerator. There are currently 11 certified operators on staff. According to Ms. Bricker, the incinerator is never operated without a certified operator present. I reviewed the training program slide deck/manual used for the most recent operator refresher training, and it appeared to have all required components specified in 40 CFR 63.1206(c)(6)(v).

The staff were very knowledgeable about the incineration process and monitoring system. The monitoring system appears robust and suited to monitor and regulate materials going into the incinerator. Continuous Emission Monitoring System (CEMS) and Bag Leak Detection System (BLDS) data were observed and demonstrated compliance with the permit requirements.
The baghouse collection, PAC storage, and incinerator discharge areas were all well kept and orderly. Very little debris was visible on the ground or in the surrounding areas.

I requested and reviewed the most recent Startup, Shutdown and Malfunction Plan, Emergency Safety Vent Operating Plan, Operation and Maintenance Plan, and

Feedstream Analysis Plan. All plans appeared complete and to demonstrate compliance with the applicable sections of 40 CFR Part 63 Subpart EEE.

End of report.