

Fact Sheet
Two Tentative Hazardous Waste Permit Actions:
(1) Off-site Shipment and Disposal of Agent Hydrolysate
and (2) Addition of Rocket Motor Storage Units
Blue Grass Army Depot (BGAD)
Richmond, Madison County, Kentucky
EPA ID KY8-213-820-105, AI 2805
July 16, 2021

The Kentucky Energy and Environment Cabinet, Division of Waste Management (Division), has tentatively approved two significant permit modifications to the Hazardous Waste Permit issued to the Blue Grass Army Depot (BGAD). The permitting process is governed by the requirements of the federal Resource Conservation and Recovery Act (RCRA) and Commonwealth of Kentucky statutes and regulations. The permit modifications are for the chemical weapon disposal facility known as the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP). The permit modifications are:

1. **Off-site Shipment and Disposal of Agent Hydrolysate.** Details of the proposed permit action are contained in an application entitled Class 3 Hazardous Waste Storage & Treatment Permit Modification Request, Offsite Shipment and Disposal of Agent Hydrolysate dated March 10, 2021. This permit modification request includes shipment of agent hydrolysate to an off-site facility for treatment and disposal. Approximately 1,800,000 gallons of hydrolysate will be shipped in about 450 tanker trucks to the Veolia facility in Port Arthur Texas for incineration. The application includes Transportation Risk Assessments, which have been conducted to ensure safe shipment of hydrolysate. Supercritical Water Oxidation (SCWO) development efforts for treatment of agent hydrolysate will be discontinued.
2. **Addition of Rocket Motor Storage Facilities.** Details of the proposed permit action are contained in an application entitled Class 3 Hazardous Waste Storage & Treatment Permit Modification Request, Increase in Permitted Storage Units for Uncontaminated Rocket Motor Storage dated April 5, 2021. This permit modification request includes an increase in RCRA Permitted storage of up to 29 pre-existing igloos located on the BGCAPP footprint and in the BGAD ammunition restricted area but not within the Chemical Limited Area. The rocket motors will have been monitored to ensure they contain no detectable chemical agent and screened to Worker Protection Limit.

The Blue Grass Army Depot (BGAD) is the owner of the facility. BGAD is located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The BGAD facility contact is Ramesh Melarkode (859) 779-6268. Bechtel Parsons Blue Grass Joint Venture (BPBG) is the operator of the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP). The BPBG contact is John McArthur (859) 625-6447.

I. Purpose of the Permitting Process

The permitting process gives the public the opportunity to evaluate the Permittee's ability to comply with the hazardous waste management regulations. The Division must prepare a draft permit that identifies, within one concise document, every applicable requirement that must be met. The public then has forty-five (45) days to review the draft permit and submit comments before the Cabinet makes any final permit decision.

II. Facility Description

BGAD is a 14,596-acre facility operated by the United States Army, located within Madison County, Kentucky. The depot was established in April 1942 during World War II by the War Department as an ordnance supply depot. BGAD has other permitted hazardous waste storage and treatment units in addition to the chemical agent destruction facilities.

III. Basis of the Draft Permits

The Division has reviewed the permit applications shown above, has determined that they are technically complete, and has tentatively decided to issue hazardous waste permit modifications for the transportation, storage and treatment activities.

The draft permit actions include conditions required under RCRA and the Commonwealth of Kentucky statutes and regulations to ensure that all hazardous waste treatment, storage and disposal activities are protective of human health and the environment.

IV. Procedures to Make a Final Decision

The draft permit tentative approval is announced through a public notice, which is mailed to appropriate agencies and individuals on the facility mailing list, as well as published in Richmond Register, Berea Citizen, and Lexington Herald-Leader newspapers. The public notice announces the opening of a forty-five (45) day public comment period in which any interested person is encouraged to submit comments on the proposed draft permit. This public comment period begins on **July 25, 2021**.

A **public meeting** will be conducted on **September 1, 2021 at 6:00 pm** in the Perkins Building, Kit Carson Drive, on the Eastern Kentucky University campus in Richmond, Kentucky. A **public hearing** will be held immediately following the public meeting noted above, also at the Perkins Building, for any persons who wish to make formal comments on the proposed permit modification.

The public comment period will end on **September 8, 2021**.

If you have any questions, please contact either:

- Brandon May, at Brandon.may@ky.gov or 502-782-7010
- Dale Burton, at dale.burton@ky.gov or 502-782-6331

The public comment period will end on **September 8, 2021**.

The administrative record, which includes the draft permit, the permit application, and related information, can be reviewed at the following locations:

- *Madison Co. Public Library, Richmond, 507 West Main St., Richmond, KY 40475, (859) 623-6704*
- *Eastern Kentucky University, John G. Crabbe Library, 457 University Dr., Room 306, Government Documents Section, Richmond, KY 40475, 859-622-2068*
- *Berea College, Hutchins Library, Campus Dr., Berea, KY 40403, (859) 985-3364*
- *Madison Co. Public Library, Berea, 319 Chestnut St., Berea, KY 40403, (859) 986-7112*
- *Estill County Public Library, 246 Main St., Irvine, KY 40336 (606) 723-3030*
- *Division of Waste Management* web site: <https://eec.ky.gov/Environmental-Protection/Waste/hazardous-waste/Pages/BGAD-Project-Documents.aspx>

Anyone wishing to submit a comment, needing additional information, or wanting to be put on the facility mailing list should contact:

Brandon May
Kentucky Energy and Environment Cabinet
Division of Waste Management
300 Sower Boulevard
Frankfort, Kentucky 40601
(502) 782-7010
Email: brandon.may@ky.gov

What will the Division do with the Comments they receive?

After consideration of all written comments and requirements of state laws and regulations, the Director of the Division of Waste Management will make a final decision regarding the permit modifications. If the tentative decision to issue a permit is substantially changed, the Division will issue a public notice indicating a revision of the decision. If the tentative decision to issue a permit modification is substantially unchanged from those announced in the public notice, notification of issuance will be given to the applicant and each person who has submitted comments or requested notice of the final permit decision. When a final permit is issued, the Division will also release a Response to Comments document. All significant comments on the draft permit, raised during the public comment period, will be responded to in the Response to Comments document.

Any person who may be aggrieved by the final issuance of the permit modification may file a petition with the Cabinet or the Division, which sets forth the grounds of the objection and the demand for a formal hearing pursuant to KRS 224.10-420(2). This type of hearing is held before a hearing officer. All parties are advised to have legal counsel present.

The Division of Waste Management does not discriminate on the basis of race, color, religion, national origin, disability, sex, age, sexual orientation, gender identity, ancestry, or veteran status. The division provides, on request, reasonable accommodations necessary to afford an individual with a disability an equal opportunity to participate in all services, programs and activities. To request materials in an alternate format, contact John Moore at (502) 782-6419, or johnf.moore@ky.gov. Hearing and speech impaired persons may contact the agency by using the Kentucky Relay Service, a toll-free telecommunication device for the deaf (TDD). For voice to TDD, call (800)648-6057. For TDD to voice, call (800)648-6056.