Fact Sheet

Tentative Hazardous Waste Permit Actions
Addition of Nerve Agent Treatment in Two Static Detonation Chambers
Blue Grass Army Depot (BGAD)
Richmond, Madison County, Kentucky
EPA ID KY8-213-820-105, AI 2805
January 30, 2022

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 two permit modifications are:

1. **Treatment of Nerve Agent VX in Static Detonation Chamber (SDC), SDC 1200**. Details of the proposed permit action are contained in an application entitled Class 3 Hazardous Waste Storage & Treatment Permit Modification Request; Static Detonation Chamber (SDC) 1200 Off-gas Treatment System dated October 21, 2021. This permit modification request includes the following items:

    a. Reconfiguration of the SDC system to include elimination of portions of existing equipment in the BGCAPP Explosive Destruction Technology (EDT) Enclosure Building (EEB), including the buffer tank and Off-Gas Treatment System (OTS) used during destruction of mustard agent-filled munitions
    b. Treatment of containerized or overpacked M56 rocket warheads containing VX,
    c. Installation of a new buffer tank and OTS to provide increased performance capabilities of these systems for treatment of VX munitions
    d. Addition of permitted tank storage for the Bleed Water Tank being installed as a part of the new OTS
    e. Addition of permitted container storage locations in the new OTS structure for storage of operations process and maintenance wastes and OTS liquid waste storage prior to loading and shipment offsite for disposal
    f. Update Part A to include changes in process codes, design capacities, waste codes, and waste streams to align with changes in this PMR and new, Kentucky-listed waste codes in 401 KAR 39:060
    g. Transportation of munitions from Assembled Chemical Weapons Alternatives (ACWA) storage or brought from the BGCAPP Main Plant and delivered to the EDT Service Magazine (ESM) or directly to the facility for processing

2. **Treatment of Nerve Agent GB in Static Detonation Chamber, SDC 2000**. Details of the proposed permit action are contained in an application entitled Class 3 Hazardous Waste Storage & Treatment Permit Modification Request; Addition of Explosive Destruction Technology (SDC 2000) dated October 21, 2021. This permit modification request includes the following items:

    a. Addition of a Miscellaneous Treatment Unit, Static Detonation Chamber (SDC) 2000 system, an Off-gas Treatment System, and an Enclosure Building (EB)
    b. Treatment of overpacked M55 rockets, containerized or overpacked M56 rocket warheads, overpacked contaminated rocket motor assemblies (RMAs) in their shipping and firing tube, and agent and explosive contaminated secondary wastes
    c. Addition of four permitted container storage areas within the EB, an Earthen Covered Magazine (ECM), and a frac tank container storage area
    d. Addition of a permitted tank storage in the Bleed Water Tank system for storage of OTS liquids
    e. Addition of engineering controls, including cascading ventilation and carbon filtration of the OTS, EB, and ECM
    f. Transportation of munitions from Blue Grass Chemical Activity (BGCA) storage, ACWA storage, or brought from the BGCAPP Main Plant and delivered to the ECM or directly to the facility for processing

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 **January 30, 2022** and will end on **March 16, 2022**.

If you have any questions, please contact Brandon May, at Brandon.may@ky.gov or 502-782-7010.

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

1. ***Madison Co. Public Library, Richmond, 507 West Main St., Richmond, KY 40475, (859) 623-6704***
2. ***Eastern Kentucky University, John G. Crabbe Library, 457 University Dr., Room 306, Government Documents Section, Richmond, KY 40475, 859-622-2068***
3. ***Berea College, Hutchins Library, Campus Dr., Berea, KY 40403, (859) 985-3364***
4. ***Madison Co. Public Library, Berea, 319 Chestnut St., Berea, KY 40403, (859) 986-7112***
5. ***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, request a Public Hearing, 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.