## **PUBLIC NOTICE**

# Blue Grass Army Depot (BGAD) EPA ID #KY8-213-820-105, AI #2805

# Tentative Approval of Three (3) Hazardous Waste Permitting Actions

The Kentucky Energy and Environment Cabinet (Cabinet), Division of Waste Management (Division), has tentatively approved two separate Resource Conservation and Recovery Act (RCRA) modifications to the existing hazardous waste permit for Blue Grass Army Depot (BGAD). In addition, the U.S. Environmental Protection Agency (EPA) is proposing to issue a Hazardous and Solid Waste Amendments (HSWA) permit for RCRA organic air emissions.

The U.S. Army is the owner of the entire permitted facility, including the additional activities proposed in this public notice. Modification #1 under this public notice is to permit a storage and treatment operation to destroy mustard (H) projectiles using an explosive detonation technology (EDT) process ("the EDT Permit"). Bechtel Parsons Blue Grass Joint Venture (BPBG) will be the operator of the EDT Permit. Modification #2 under this notice is to permit a mustard (H) sampling operation ("the Mustard Sampling Permit") which is classified in Kentucky as treatment of a hazardous waste. The U.S. Army Assembled Chemical Weapons Alternatives (ACWA) will be the operator of the Mustard Sampling Permit. Modification #3 is the U.S. EPA's draft HSWA Permit which includes requirements for organic air emissions for which Kentucky is not yet authorized to regulate. The EPA HSWA Permit and the EDT Permit will constitute the full RCRA Permit for the EDT operations.

BGAD is located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The BGAD facility contact is Joe Elliott (859)779-6374. The BPBG contact is John McArthur (859)625-6447. The ACWA contact is Todd Williams (859)625-6264.

#### What will be done and why?

RCRA regulations require that proposed hazardous waste permits or modifications include a thorough review of all required information to ensure that all hazardous waste program requirements are met, and that all interested parties have an opportunity to review and comment upon the proposed actions. The Division and EPA have completed their reviews of the respective permit applications and have prepared draft Permits. The draft Permits set forth conditions for conducting the hazardous waste operations. The Division and EPA have determined that the applications for their respective permits meet the requirements set forth in the regulations, and that operation of the facility in accordance with the requirements of the Permits will not pose an unreasonable risk to human health or the environment. The three proposed permitting actions are:

- 1. EDT Permit: The Division has tentatively approved a permit modification for storage and treatment (including destruction) of mustard (H) projectiles that are currently stored at BGAD.
- 2. Mustard Sampling Permit: The Division has tentatively approved a permit modification for treatment (movement and handling of munitions) and to collect samples from mustard (H) projectiles for treaty verification purposes.
- 3. HSWA Permit: The U.S. EPA, Region 4 (Atlanta) is proposing issuance of a Hazardous and Solid Waste Amendments (HSWA) permit to complement the Division's hazardous waste permit. EPA's permit primarily has requirements for RCRA Organic Air Emission Standards included in 40 CFR 264.1030 through 264.1091. Kentucky does not yet have delegated authority for this part of RCRA.

#### How can I tell the Division and EPA what I think about these tentative approvals?

Public involvement is encouraged and comments are welcome. Anyone wishing to comment on the tentative decision to approve these three permitting actions should submit comments on or before **September 21, 2016**, the close of the public comment period. Additionally, a public meeting will be conducted on **September 14, 2016** at **6:30 pm** in the Perkins Building, Kit Carson Drive, at Eastern Kentucky University, followed by a public hearing at **7:30 pm** at the same location.

Comments on the EDT Permit and Mustard Sampling Permit should be mailed to Heather Alexander, Kentucky Energy and Environment Cabinet, Division of Waste Management, 300 Sower Boulevard, Frankfort, Kentucky 40601, with all issues of concern clearly stated. Electronic comments should be submitted to <a href="heather.alexander@ky.gov">heather.alexander@ky.gov</a>, (502) 564-6716. All comments received by **September 21, 2016** will be considered when making a final decision on each of the

proposed permitting actions. Anyone submitting comments will be sent a "response to public comments" document specifying any changes made or not made, with the reasons why, as a result of the comment(s) submitted. Any person who may be aggrieved by the final decision on these proposed permit modifications may file with the cabinet a petition which sets forth the grounds of the objection and demand a hearing pursuant to KRS 224.10-420(2).

Persons wishing to comment on the EPA's proposed decision to issue the HSWA Permit are invited to submit comments during the public comment period beginning August 7, 2016 and ending on September 21, 2016. All comments received will be considered in the EPA's final decision to issue the HSWA Permit. Questions concerning this proposed issuance of the EPA HSWA Permit and written comments must be submitted by **September 21, 2016**, to Ms. Terri Crosby-Vega, (404) 562-8497, at the following address: U.S. Environmental Protection Agency, Region 4, RCRD Materials and Waste Management Branch, Atlanta Federal Center, ATTN: Terri Crosby-Vega, 61 Forsyth Street, Atlanta, Georgia 30303.

#### Where can I review the documents used to make these tentative decisions?

*Madison Co. Public Library, Richmond,* 507 West Main Street, Richmond, KY 40475, (859) 623-6704 *Eastern Kentucky Univ., John G. Crabbe Library*, 521 Lancaster Ave., Room 306 in Government Documents Section, Richmond, KY 40475, 859-622-2068

Chemical Stockpile Outreach Office, 1000 Commercial Drive, Suite 2, Richmond, KY 40475, (859) 626-8944 Berea College, Hutchins Library, 100 Campus Drive, Berea, KY 40404, (859) 985-3364

Madison Co. Public Library, Berea, 319 E. Chestnut, Berea, KY 40403, (859) 986-7112

Estill County Public Library, 246 Main Street, Irvine, KY 40336 (606) 723-3030

*U.S. Environmental Protection Agency, Region 4*, RCRD Materials and Waste Management Branch, Atlanta Federal Center, ATTN: Terri Crosby-Vega, 61 Forsyth Street, Atlanta, Georgia 30303, Office hours 8:00 a.m. to 5:00 p.m. (HSWA Permit documents only), 404-562-8497

*Division of Waste Management*, 300 Sower Boulevard, Frankfort, KY 40601, Contact: Heather Alexander, (502) 564-6716, or email <a href="mailto:heather.alexander@ky.gov">heather.alexander@ky.gov</a>.

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) 564-6716, or john.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.

### **Fact Sheet**

Hazardous Waste Permit Modification

Mustard Agent (H) Sampling Operations ("Mustard Sampling Permit")

Blue Grass Army Depot

Richmond, Madison County, Kentucky

EPA ID KY8-213-820-105, AI 2805

August 7, 2016

The Kentucky Energy and Environment Cabinet, Division of Waste Management (Division), has tentatively approved a Resource Conservation and Recovery Act (RCRA) permit modification for the movement and sampling of mustard (H) agent from projectiles for treaty verification purposes at the Blue Grass Army Depot (BGAD). This proposed permit modification is termed the "Mustard Sampling Permit" for convenience of reference. The U.S. Army is the owner of the entire facility, including the Mustard Sampling operation. The U.S. Army Assembled Chemical Weapons Alternatives (ACWA) will be the operator of the Mustard Sampling Permit. BGAD is located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The BGAD facility contact is Joe Elliott (859)779-6374. The ACWA contact is Todd Williams (859)625-6264.

#### **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 during World War II by the War Department as an expansion of ordnance supply depots. BGAD currently has a total of 49 permitted hazardous waste storage units (igloos). This permit modification would add additional hazardous waste units which are necessary in order to sample mustard (H) projectile munitions that are currently in storage at BGAD, for treaty verification purposes. Under Kentucky statute KRS 224.50-130, handling or movement of a chemical agent munition constitutes treatment of the agent, which requires a Hazardous Waste permit.

The Mustard Sampling will fulfill the United States' obligations under the Chemical Weapons Convention (CWC) ("treaty"). When the United States signed the treaty, the government agreed to destroy the country's entire stockpile of chemical weapons. To confirm that a country is indeed destroying its inventory of chemical agent, delegates from the Organisation for the Prohibition of Chemical Weapons (OPCW) select, or "tag", a few representative munitions in the stockpile. The content of each munition is verified just before the munition is destroyed. The Mustard Sampling Facility includes an Environmental Enclosure where these selected mustard projectiles will be carefully sampled, and then analyzed in an on-site laboratory. This will verify to the treaty representatives that mustard (H) agent is in fact being destroyed in the Explosive Detonation Technology (EDT) facility. The EDT process itself is described in a separate fact sheet.

#### **III. Basis of the Draft Permit**

The Hazardous Waste regulations require that the applicant submit a complete permit application for proposed hazardous waste treatment or storage activities so that a review of all information is completed and the permit is modified as needed.

The Division has reviewed the Mustard Sampling permit application and has determined that it is technically complete, and has tentatively decided to issue a hazardous waste storage and treatment permit modification to BGAD and ACWA for the Mustard Sampling operation. The draft Mustard Sampling Permit contains specific conditions to ensure protectiveness, and that any potential emissions from the movement and sampling processes are monitored and filtered to protect human health and the environment. The current schedule is for mustard (H) agent sampling operations for treaty verification to occur shortly before the end of the mustard (H) destruction campaign.

# 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 **August 7**, **2016**. There are three scheduled opportunities for interested persons to learn more about the proposed permit:

- 1. There will be some discussion of the draft permit at the quarterly CAC/CDCAB meeting at **1:30 pm** on **September 14, 2016** in the Perkins Building, Kit Carson Drive, Eastern Kentucky University, Richmond, KY.
- 2. A public meeting will be conducted on **September 14, 2016** at **6:30 pm** in the Perkins Building.
- 3. A **public hearing** will be held at **7:30 pm** 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 21, 2016.

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 Street, Richmond, KY 40475, (859) 623-6704
- 2. *Eastern Kentucky Univ.*, *John G. Crabbe Library*, 521 Lancaster Ave., Room 306 in Government Documents Section, Richmond, KY 40475, 859-622-2068
- 3. Chemical Stockpile Outreach Office, 1000 Commercial Drive, Suite 2, Richmond, KY 40475, (859) 626-8944
- 4. Berea College, Hutchins Library, 100 Campus Drive, Berea, KY 40404, (859) 985-3364
- 5. Madison Co. Public Library, Berea, 319 E. Chestnut, Berea, KY 40403, (859) 986-7112
- 6. Estill County Public Library, 246 Main Street, Irvine, KY 40336 (606) 723-3030
- 7. *Division of Waste Management*, 300 Sower Boulevard, Frankfort, KY 40601, Contact: Heather Alexander, (502) 564-6716, or email heather.alexander@ky.gov.

Upon request, this information can be made available in alternative formats. To make an appointment, submit a written request at least 72 hours prior to the desired review date.

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

Heather Alexander Kentucky Energy and Environment Cabinet Division of Waste Management 300 Sower Boulevard Frankfort, Kentucky 40601 (502) 564-6716

Email: Heather. Alexander@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 Mustard Sampling permit issuance. 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 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 issuance of the Mustard Sampling Permit 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) 564-6716, or john.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.

# **Fact Sheet**

Hazardous Waste Permit Modification
Explosive Destruction Technology (EDT) ("EDT Permit")
Blue Grass Army Depot
Richmond, Madison County, Kentucky
EPA ID KY8-213-820-105, AI 2805
August 7, 2016

The Kentucky Energy and Environment Cabinet, Division of Waste Management (Division), has tentatively approved a Resource Conservation and Recovery Act (RCRA) permit modification for the storage and treatment (including destruction) of mustard (H) projectiles at the Blue Grass Army Depot (BGAD). The proposed method to destroy the munitions is called Explosive Destruction Technology (EDT). This proposed permit modification is termed the "EDT Permit" for convenience of reference. The U.S. Army is the owner of the entire facility, including the EDT operation. Bechtel Parsons Blue Grass Joint Venture (BPBG) will be the operator of the EDT Permit. BGAD is located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The BGAD facility contact is Joe Elliott (859)779-6374. 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 during World War II by the War Department as an expansion of ordnance supply depots. BGAD currently has a total of 49 permitted hazardous waste storage units (igloos). This permit modification would add additional hazardous waste storage and treatment units for the destruction of mustard (H) projectile munitions that are currently in storage at BGAD.

The EDT Facility includes a Service Magazine for the storage of mustard projectiles and the EDT Enclosure Building, which houses the Static Detonation Chamber and Off-gas Treatment System. The detonation chamber is an upgraded version of the chamber that successfully destroyed mustard-filled munitions at Anniston, Alabama. The detonation chamber is used to heat projectiles, causing a detonation or deflagration, releasing the mustard (H) agent from the projectile. The detonation chamber and downstream Thermal Oxidizer use heat to destroy mustard (H) agent. Agent destruction is followed by a multiple step off-gas treatment system. This system is designed with interlocks and redundant systems to ensure safety and prevent the release of contaminants harmful to the public or environment.

#### III. Basis of the Draft Permit

The Hazardous Waste regulations require that the applicant submit a complete permit application for proposed hazardous waste treatment or storage activities so that a review of all information is completed and the permit is modified as needed.

The Division has reviewed the Explosive Destruction Technology (EDT) permit application and has determined that it is technically complete, and has tentatively decided to issue a hazardous waste storage and treatment permit modification to BGAD and BPBG for the EDT operation. The draft EDT Permit contains specific conditions to ensure complete destruction, and that any potential emissions from the treatment or storage processes are filtered and monitored to ensure protectiveness of human health and the environment. The permit helps ensure that the process achieves the required 99.9999% destruction and removal efficiency. The current schedule is for mustard (H) agent operations to begin in September 2017 and be completed in approximately 9 months.

#### 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 **August 7, 2016**. There are three scheduled opportunities for interested persons to learn more about the proposed permit:

- 1. There will be some discussion of the draft permit at the quarterly CAC/CDCAB meeting at **1:30 pm** on **September 14, 2016** in the Perkins Building, Kit Carson Drive, Eastern Kentucky University, Richmond, KY.
- 2. A public meeting will be conducted on **September 14, 2016** at **6:30 pm** in the Perkins Building.
- 3. A **public hearing** will be held at **7:30 pm** 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 21, 2016.

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 Street, Richmond, KY 40475, (859) 623-6704
- 2. *Eastern Kentucky Univ., John G. Crabbe Library*, 521 Lancaster Ave., Room 306 in Government Documents Section, Richmond, KY 40475, 859-622-2068
- 3. Chemical Stockpile Outreach Office, 1000 Commercial Drive, Suite 2, Richmond, KY 40475, (859) 626-8944
- 4. Berea College, Hutchins Library, 100 Campus Drive, Berea, KY 40404, (859) 985-3364
- 5. Madison Co. Public Library, Berea, 319 E. Chestnut, Berea, KY 40403, (859) 986-7112
- 6. Estill County Public Library, 246 Main Street, Irvine, KY 40336 (606) 723-3030
- 7. *Division of Waste Management*, 300 Sower Boulevard, Frankfort, KY 40601, Contact: Heather Alexander, (502) 564-6716, or email <a href="https://heather.alexander@ky.gov">heather.alexander@ky.gov</a>.

Upon request, this information can be made available in alternative formats. To make an appointment, submit a written request at least 72 hours prior to the desired review date.

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

Heather Alexander Kentucky Energy and Environment Cabinet Division of Waste Management 300 Sower Boulevard Frankfort, Kentucky 40601 (502) 564-6716

Email: Heather.Alexander@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 EDT permit issuance. 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 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 issuance of the EDT permit 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) 564-6716, or john.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.



# **NEW EPA FACILITY PERMIT**

EPA REGION 4
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

BLUE GRASS ARMY DEPOT – RICHMOND, KENTUCKY EXPLOSIVE DESTRUCTION TECHNOLOGY FACILITY EPA ID. KY8-213-820-105

# **Public Information Session**

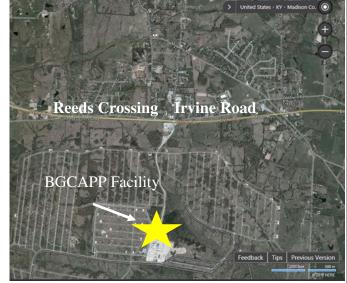
September 14, 2016, 6:30 pm
Perkins Building/ Eastern Kentucky University Campus
Kit Carson Drive, Richmond, KY

Residents are invited to attend a public meeting about the new U.S. Environmental Protection Agency Permit for the Blue Grass Army Depot (BGAD) Explosive Destruction Technology (EDT) facility. The EPA Hazardous and Solid Waste Amendments (HSWA) Permit will address only the organic air emissions standards of RCRA. During the Public Information Session, representatives from the EPA, the Kentucky Division of Waste Management (KDWM), BGAD, and Bechtel Parsons Blue Grass (BPBG) will present an overview of the applicable RCRA requirements and the EDT operations at the facility. Following the presentation, an informal session will be held to provide opportunities to discuss and ask questions. There will be a formal public hearing for any interested parties to provide formal comments on the proposed Permit at 7:30 pm. Refreshments will be provided by the facility.

# **BACKGROUND**

BGAD is located at 431 Battlefield Memorial Highway in Richmond, Kentucky. BGAD is a U.S. Army Depot that stores and treats conventional and chemical munitions. The U.S. Department of the Army, the property owner, and BPBG, the current operating contractor, are building a facility to destroy mustard-containing chemical weapons in a Static Detonation Chamber (SDC) at the portion of the BGAD known as Blue Grass Chemical-Agent Destruction Pilot Plant (BGCAPP). The EDT operations will destroy only mustard agent-containing munitions and Department of Transportation storage bottles that contain mustard agent.

BGAD also stores munitions that contain the nerve agents GB and VX. The destruction of those chemical



munitions at BGCAPP is not part of the current draft HSWA Permit. The GB and VX nerve agent destruction will be covered under a separate permit modification that is currently under review by EPA and KDWM.

# WHAT is RCRA and WHY does BGAD need a permit?

RCRA stands for the Resource Conservation and Recovery Act that was passed in 1976 and established a national hazardous waste program governing the management of hazardous waste from generation through disposal. RCRA was amended by HSWA in 1984, adding certain requirements to the hazardous waste program. In the 1990s, regulations for organic air emission standards were included in the regulations. These air emission standards are covered by this HSWA Permit.

The BGAD currently stores 523 tons of chemical agents, including mustard agent. These chemical munitions are considered hazardous wastes due to their reactive and toxic chemicals. The EDT treatment is being performed under an international treaty. The treatment of the munitions must be performed under the authority of a RCRA permit. Further information regarding chemical weapons treatment at BGAD can be found at the following web address: www.peoacwa.army.mil/bgcapp/.

# **EPA HSWA PERMIT**

Under the RCRA regulations, the BGAD facility must obtain a permit to store and treat any mustard chemical agent waste at its facility. The draft HSWA Permit for BGAD's EDT operations, once finalized, will be issued for a ten-year period. The draft HSWA Permit is subject to change based on information received as a result of public participation.

The draft HSWA Permit addresses the RCRA Organic Air Emission Standards set forth in 40 CFR §264.1030 through §264.1091 (Subparts AA, BB, and CC). These regulations address organic air emissions associated with process vents, equipment leaks, containers, tanks, and miscellaneous units. The EDT facility does not currently have any process vents that are covered by the regulations. As a result, the draft HSWA Permit addresses only the requirements of Subpart BB, pertaining to equipment leaks, and Subpart CC, pertaining to tanks, containers and miscellaneous units.

# **COMMUNITY INVOLVEMENT**

The draft HSWA Permit is open for public comment from August 7, 2016 to September 21, 2016. All comments received by September 21, 2016, will be considered in the final decision to issue the draft HSWA Permit. The EPA will respond to all written comments submitted. The Administrative Record for the draft HSWA Permit, including copies of the draft HSWA Permit and supporting documents, are available for review in hard copy at the: Madison County Public Library, Richmond Branch, 507 West Main Street, Richmond, KY 40475; Madison County Public Library, Berea Branch, 319 E. Chestnut, Berea, KY 40403; John G. Crabbe Library, Eastern Kentucky University, 521 Lancaster Avenue, Richmond, KY 40475; Chemical Stockpile Outreach Office, 1000 Commercial Drive, Suite 2, Richmond, KY 40475; Berea College Hutchins Library, 100 Campus Drive, Berea, KY 40404; and Estill County Public Library. 246 Main Street, Irvine, KY 40336.

The draft HSWA Permit can also be viewed on EPA Region 4's website at https://www.epa.gov/aboutepa/about-epa-region-4-southeast.

# **CONTACT FOR EPA DRAFT HSWA PERMIT:**

# Terri Crosby-Vega

Environmental Engineer RCR Division US EPA Region 4 61 Forsyth Street SW, Atlanta, GA 30303 E-mail: crosby-vega.terri@epa.gov (404) 562-8497

## REGULATORY APPLICABILITY

KDWM has authority to issue RCRA permits in the Commonwealth of Kentucky, with the exception of certain HSWA requirements, including the RCRA organic air emission standards included in 40 CFR §264.1030 through §264.1091. Because KDWM does not have delegated authority to implement these standards, the EPA must issue a companion HSWA Permit in conjunction with the KDWM Permit. The KDWM and the EPA Permits will constitute the full RCRA Permit for BGAD's EDT operations.

The EPA HSWA Permit only addresses the requirements of the RCRA organic air emission standards included in 40 CFR §264.1030 through §264.1091.



Detonation chamber at the factory where the chamber was built.



The Thermal Oxidizer, which provides thermal treatment of the exhaust gas leaving the detonation chamber.