

PUBLIC NOTICE

**Blue Grass Army Depot (BGAD)
Madison County, Kentucky
Hazardous Waste Permit Modification
Tentative Approval
EPA ID #KY8-213-820-105, AI #2805**

The Kentucky Energy and Environment Cabinet (Cabinet), Division of Waste Management (Division), has tentatively approved a Resource Conservation and Recovery Act (RCRA) modification to the existing hazardous waste permit for Blue Grass Army Depot (BGAD).

The modification to BGAD's permit is to add a new section on Open Burning (OB) and Open Detonation (OD) activities. The activities are collectively referred to as "OB/OD."

The U.S. Army is the owner of the entire permitted facility, including the additional activities proposed in this public notice. BGAD is located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The BGAD facility contact is Joe Elliott, (859) 779-6268.

Why do BGAD's Open Burning and Open Detonation activities need a permit from the Division?

BGAD uses the OB thermal treatment process to treat bulk military propellant and propellant charges. Open burning is conducted in large metal pans that are permanently mounted on concrete pads.

BGAD uses OD to treat munitions and explosives with the potential to detonate. OD operations occur in pits that have been dug into the soil. Before munitions are detonated, they are covered with soil to reduce noise and dispersal of shrapnel and debris. In rare cases, small amounts of explosive material are detonated without soil cover.

BGAD has conducted OB/OD activities for many years under "interim status" requirements; the draft permit will impose specific conditions for future OB/OD operations. Kentucky environmental regulations require BGAD to have a hazardous waste management permit to treat hazardous wastes during OB/OD operations.

Where can I review the documents used to make this tentative approval?

Madison Co. Public Library, Richmond, 507 West Main Street, Richmond, KY 40475, (859) 623-6704

Eastern Kentucky University, John G. Crabbe Library, 457 University Dr., 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

Division of Waste Management, 300 Sower Boulevard, Frankfort, KY 40601, Contact: April Webb, (502) 782-6470, or email april.webb@ky.gov.

How can I tell the Division what I think about this tentative approval?

Public involvement is encouraged and comments are welcome. Anyone wishing to comment on the tentative decision to approve these permitting actions should submit comments on or before **August 22, 2018**, the close of the public comment period. Additionally, a public meeting will be conducted on **August 8, 2018**, at **6:00 pm** in the Perkins Building, Kit Carson Drive, at Eastern Kentucky University, Richmond, Kentucky, followed by a public hearing at **7:00 pm** at the same location.

Comments or requests for further information on the Permit Modification should be mailed to April Webb, Kentucky Energy and Environment Cabinet, Division of Waste Management, 300 Sower Boulevard, Second Floor, Frankfort,

Kentucky 40601, with all issues of concern clearly stated. Electronic comments should be submitted to april.webb@ky.gov, (502) 782-6470.

What will the Division do with the comments they receive?

The Cabinet will consider all comments, received by the close of the public comment period on August 22, 2018, in making a final decision. Anyone submitting comments will be mailed a “response to public comments” document specifying any changes made or not made (with reasons why) as a result of the comment(s) submitted.

Any person who may be aggrieved by the issuance of a permit for this proposed waste disposal facility 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)

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 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 Action
Open Burn/Open Detonation Permit
Blue Grass Army Depot
Richmond, Madison County, Kentucky
EPA ID KY8-213-820-105, AI 2805
July 8, 2018

The Kentucky Energy and Environment Cabinet, Division of Waste Management (Division), has tentatively approved a request for a permit modification at the Blue Grass Army Depot (BGAD) for an Open Burn/Open Detonation Permit. The permit is required by the Resource Conservation and Recovery Act (RCRA) and Commonwealth of Kentucky statutes and regulations.

Details of the proposed permit actions are contained in an application entitled HAZARDOUS WASTE FACILITY PERMIT RCRA HAZARDOUS WASTE TREATMENT PERMIT APPLICATION FOR CONVENTIONAL MUNITIONS BY OPEN BURNING and OPEN/BURIED DETONATION, dated June 2017. The Division has prepared a draft permit which is available for public review as noted below.

Blue Grass Army Depot is the owner of the entire facility. BGAD will be the operator for Open Burn and Open Detonation Units. BGAD is located at 431 Battlefield Memorial Highway, Richmond, Kentucky.

The BGAD facility contact is Joe Elliott ((859) 779-6374).

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 expansion of ordnance supply depots. BGAD provides mission-essential ammunition surveillance, renovation, and conventional munitions demilitarization support to the Department of Defense. This permit modification adds the Open Burn and Open Detonation/Buried Detonation Units to the existing hazardous waste permit.

Each of the two Open Burn Units (OB Pan 1 and OB Pan 2) is a hazardous waste miscellaneous treatment unit. Each OB Unit consists of a burn pan, its underlying concrete pad, the associated sediment catchment system, and the area surrounding each pad. The Open Burn (OB) thermal treatment process treats bulk military propellant and propellant charges.

The Open Detonation Unit is a hazardous waste miscellaneous treatment unit that consists of a maximum of 30 pits, the area surrounding the pits, and two erosion control barriers. BGAD uses Open Detonation/Buried Detonation (OD) to treat munitions and explosives with the potential to detonate.

III. Basis of the Draft Permit

The Division has reviewed the permit application and has determined that it is technically complete. The Division has tentatively decided to issue a hazardous waste treatment permit modification for the operation.

BGAD has operated the Open Burn and Open/Buried Detonation Units since the 1940's, and under RCRA interim status since 1988. Issuance of this permit brings these operations under a RCRA Subpart X permit.

BGAD uses the Open Burning (OB) thermal treatment process to treat bulk military propellant and propellant charges (packaged propellant). BGAD uses Open Detonation/Buried Detonation (OD) to treat munitions and explosives with the potential to detonate. For detonations in which the Net Explosive Weight (NEW) in a pit exceeds 20 lbs, the Permittee shall cover the munition(s) in the pit with at least six feet of soil. In addition, for all detonations, the Permittee shall

maintain at least three feet of soil between the bottom of each OD pit and bedrock. To maintain such a layer, the Permittee shall add soil to the OD/BD unit as needed.

The draft permit prohibits BGAD from treating, by either OB or OD, munitions or wastes that contain any of the following items: ammunition that is 0.50 caliber or smaller, municipal waste, containerized gases, oil, pesticides, herbicides, ammonium perchlorates, dioxins or furans, titanium tetrachloride, polychlorinated biphenyls (PCBs), flechettes, rounds containing submunitions, white phosphorus, red phosphorous, colored smoke, hexachloroethane (HC) smoke, napalm, riot control agents, biological agents, choking agents, nerve agents, blood agents, blister agents, incapacitating agents, chemical warfare materiel, components of liquid filled rounds or chemical warfare materiel, nuclear components or devices, naturally occurring radioactive materials, depleted uranium (DU), any liquids or items containing free liquids, and any Waste Military Munitions (WMM) with a different chemical composition from WMM already being treated at BGAD.

In addition, this permit imposes limits to the amounts of Net Explosive Weight (NEW) that may be treated on a per-event, daily, and annual basis. The permit also sets meteorological restrictions and groundwater monitoring standards. It also requires that BGAD submit a sediment control plan, a soil sampling plan, and a management plan for ejected materials from the OD site, and requires periodic re-evaluation of alternative technologies to open burning and open detonation.

GENERAL WASTE PROCESSING LIMITS FOR OPEN BURNING

Maximum Number of Pans	2
Maximum Treatment Quantity per Pan per Event (lb NEW¹)	2,500
Maximum Events per Day	3
Maximum Treatment Quantity per Event (lb NEW)	5,000
Maximum Daily Treatment Quantity (lb NEW)	15,000
Maximum Annual Treatment Quantity (lb NEW)²	2,500,000

¹ NEW is Net Explosive Weight.

² Permittee has taken an annual treatment limit on open burning.

GENERAL WASTE PROCESSING LIMITS FOR OPEN/BURIED DETONATION

Maximum Number of Pits	30
Maximum Treatment Quantity per Pit per Event (lb NEW¹)	100
Maximum Events per Day	3
Maximum Treatment Quantity per Event (lb NEW)	3,000
Maximum Daily Treatment Quantity (lb NEW)	9,000
Maximum Annual Treatment Quantity (lb NEW)²	1,500,000

¹ NEW is Net Explosive Weight.

² Permittee has taken an annual treatment limit on open/buried detonation.

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 8, 2018**. There are two scheduled opportunities for interested persons to learn more about the proposed permit:

1. A public meeting will be conducted on **August 8, 2018, at 6:00 pm** in the Perkins Building, Kit Carson Drive, Eastern Kentucky University, Richmond, KY.
2. A **public hearing** will be held at **7:00 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 **August 22, 2018**.

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**, 457 University Dr., 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: April Webb, (502) 564-6716 or (502) 782-6470, or email april.webb@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:

April Webb
Kentucky Energy and Environment Cabinet
Division of Waste Management
300 Sower Boulevard
Frankfort, Kentucky 40601
(502) 564-6716 or (502) 782-6470
Email: april.webb@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 modification. 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 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.

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