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**ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION**

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August 28, 2020

Colonel Stephen E. Dorris, Commander
Blue Grass Army Depot
431 Battlefield Memorial Highway
Richmond, Kentucky 40475-5060

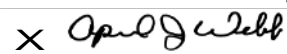
RE: Class 3 Hazardous Waste Storage & Treatment Permit Modification Request
Change in Rocket Management and Miscellaneous Permit Updates
Notice of Deficiencies (NOD) No. 2
Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)
Blue Grass Army Depot, Richmond, Madison County, Kentucky
EPA ID: KY8-213-820-105, AI# 2805, Activity# APE20200005

Dear Colonel Dorris,

The Kentucky Division of Waste Management (Division) has reviewed the response to comments and the revised permit modification request dated June 9, 2020. The following page contains the Division's comments and questions regarding this submittal. Please incorporate any changes needed and submit the entire revised application within 45 days of receipt of this letter. Please include a "red line" version of the revised application showing all changes.

If you have any questions concerning this matter, please do not hesitate to contact Dale Burton at (502) 782-6331 or at dale.burton@ky.gov.

Sincerely,

 8/28/2020

Signed by: April Webb

April J. Webb, P.E., Manager
Hazardous Waste Branch
Division of Waste Management

Attachment

EC: John McArthur, BPBG
Todd Williams, ACWA
Brian Osterman, KDEP

Joe Elliott, BGAD
Brian Ballard, ACWA
Terri-Crosby Vega, EPA Region 4

**Class 3 Hazardous Waste Storage & Treatment Permit Modification Request,
Change in Rocket Management and Miscellaneous Permit Updates
Notice of Deficiencies No. 2**

Comments:

1. NOD No. 1, comments no. 5 and 23. Part A. Page 8o, Energetics Hydrolysate remains on the Part A in two places. Please correct for the next submittal of the Part A.
2. NOD No. 1, comments no. 8, 9, 12, and 33. The Division requests a DRE calculation prior to permit issuance.
3. NOD No. 1, comment no. 14.
 - a. The proposed changes to the permit condition will require further discussion, and may need to be addressed by a separate permit modification request.
 - b. The monitoring standard agreed to for RMs exiting the MDB (0.5 VSL alarm level) was determined to be a reasonably-achievable detection limit, and therefore is not a change to the statutory requirement that a reportable quantity of agent is “any quantity”. If the permittee is capable of reliably monitoring to a lower level, then that determination may need to be revisited. The Division cannot agree to a determination that is in conflict with a statute.
4. NOD No. 1, comment no. 19. Please provide the allowable Net Explosive Weight for each storage area when available.
5. NOD No. 1, comment no. 30. Please provide Licensed Professional Engineer certified drawings when they are available.
6. NOD No. 1, comment no. 32. If there are any desired changes to the permit that were not specifically included in the application they should be submitted in a separate permit modification request.
7. NOD No. 1, comment no. 34. Part 2.14, page 8, line 26. In process items will generally not require secondary containment. However, the application should not include permit language. Please delete.
8. NOD No. 1, comment no. 38. As requested in the response to comments, the updated monitoring table will be a compliance schedule item.