

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 80, Energetics Hydrolysate remains on the Part A in two places. Please correct for the next submittal of the Part A.

**Response:** The Part A has been revised and is included with this NOD 2 Response.

2. NOD No. 1, comments no. 8, 9, 12, and 33. The Division requests a DRE calculation prior to permit issuance.

**Response:** DRE calculation 100118441-CDPO421 REV. 0 is complete and is submitted with this response.

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.

**Response:** The permit condition revision has been deleted from the PMR. Agent emission from the RM boxes is now addressed as part of the DRE calculation.

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.

**Response:** Per discussions and briefings with the BGCAPP Chief Scientist, the revised DRE calculation (100118441-CDPO425) submitted with this response includes recommended monitoring stack emission compliance limits for VX rocket and GB rocket campaigns (1 VSL), recommended agent concentration compliance limits for measurement of agent in agent hydrolysates (52 µ/L GB, 185 µ/L VX), and worst-case potential agent emission from RM boxes for both campaigns (1 VSL) to demonstrate destruction and removal efficiency of at least 99.9999% can be achieved to meet Kentucky statute 224.50-130 requirements.

4. NOD No. 1, comment no. 19. Please provide the allowable Net Explosive Weight for each storage area when available.

**Response:** Expected NEW limits for the storage areas are shown in the table below. DDESB approval for these limits is pending. Any changes as a result of the DDESB review and approval process will be provided to KDEP as a permit modification.

Permitted Unit	Current NEW	Updated NEW
UPA 1	291 lbs.	No Change
UPA 2	0 lbs.	1938 lbs.
ECV 1	6.5 lbs.	No Change
ECV 2	6.5 lbs.	No Change
ECR 1	15 lbs.	No Change
ECR 2	15 lbs.	No Change
EBH	N/A	162 lbs.
TCTR	0 lbs.	323 lbs.
TMA	0 lbs.	162 lbs.

5. NOD No. 1, comment no. 30. Please provide Licensed Professional Engineer certified drawings when they are available.

**Response:** As requested PE stamped drawings will be provided as a Compliance Schedule Item when the documents are received, reviewed and approved for issue.

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.

**Response:** As discussed additional details have been added to the permit modification request in support of the modification changes not directly tied to the RWCS system modification.

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.

**Response:** The permit language is deleted from the permit modification as well as in the proposed permit changes contained in section A.III.I.(9)/(i).

8. NOD No. 1, comment no. 38. As requested in the response to comments, the updated monitoring table will be a compliance schedule item.

**Response:** Note, revision 16 of the monitoring table has previously been provided to KDEP via a recent permit modification request (Item 1208) and contains monitoring stations added to support RWCS monitoring. Any subsequent changes or additions to the monitoring table will be provided to KDEP as a Class 1 permit modification requiring approval.