

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805 Activity: APE20210008

**PART I**  
**LEGAL AUTHORITY**

See this Part in the Entire Facility Section

**PART II**  
**STANDARD CONDITIONS**

See this Part in the Entire Facility Section

**PART III**  
**SPECIFIC CONDITIONS**

**R.III.A. GENERAL**

**R.III.A.(1) Permitted Waste Streams, Descriptions, and Codes**

The hazardous wastes which may be transported and stored in the Hazardous Waste Storage Units (HWSUs) in the Chemical Limited Area (CLA) are listed below. The containers storing hazardous wastes may hold the listed waste stream which contains a combination of the associated waste codes. Each of these hazardous wastes shall be managed as specified within this permit.

Waste Stream	Waste Code	Waste Description
01	N003	Agent contaminated debris/PPE from sampling chemical agent H
02	D001, D002, D003, D004, D011, D)18, D022, D035, D036, D037, D039, D040, D043, F001, F002, F003, F004, U002, U044, U103, U127, U154, U131, U210, N703	Laboratory wastes associated with analyzing chemical agent H
03	D002, N003	Spent decontamination waste associated with chemical agent H
04	D007, N003	Agent contaminated carbon filters
05	N001	Agent contaminated debris/PPE from GB Sampling operations

**HAZARDOUS WASTE FACILITY PERMIT**  
 Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
 Blue Grass Army Depot  
 AI: 2805 Activity: APE20210008

06	D001, D002, D003, D004, D011, D018, D022, D035, D036, D037, D039, D040, D043, F001, F002, F003, F004, U002, U044, U103, U127, U131, U154, U210, N701	Laboratory wastes associated with analyzing nerve agent GB
07	D002, N001	Spent decontamination waste
08	D007	Agent contaminated carbon filters
09	D001, D003, D005, D008, D030, N001, N701, N901	Warhead Assembly associated with GB
10	D001, D003, D005, D008, D030, N002, N702, N902	Warhead Assembly associated with VX
11	D001, D003, D008, N001, N002, N101, N102	M67 Rocket Motor Assembly, Propellant Component of the Rocket Motor, Shipping Firing Tubes, End-Caps, containerized/overpack rockets assembly or assembly parts associated with GB or VX, and Overpack VX Projectiles
12	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D022, D035, D036, D037, D039, D040, D043, F001, F002, F003, F004, U002, U044, U103, U127, U131, U154, U210, N701, N702	Lab Wastes and/or Spent Decontamination Solution associated with the management and/or treatment of GB or VX
13	N001, N002	Agent contaminated carbon filters associated with the management and/or treatment of GB or VX

*[KRS 224.50-130, KRS 224.46-530, 401 KAR 39:060 Section 3]*

**R.III.A.(2) Procedure for Adding Additional HWSUs/Igloos to this Permit**

As permitted HWSUs in the storage area of the Chemical Limited Area (CLA) under the operational control of the Blue Grass Chemical Activity (BGCA) are emptied of their chemical munitions, operational control may be transferred to the Program Executive Office (PEO) Assembled Chemical Weapons Alternatives (ACWA) as detailed below.

Potential HWSUs in the storage area of the CLA to be transferred include the following: I, J, K, L, M, P, Q, R, S, T, U, V, W, X, Y, Z, AB, CD, EF, GH, IJ, KL, MN, OP, QR, ST, UV, WX, YZ, ZA, YB, XC, WD, VE, UF, TG, SH, RI, QJ, NM, MN(H), and KP.

In order to transfer operational control of designated HWSUs, the following shall be submitted to the Division as part of a Class 1 permit modification request requiring prior Division approval:

- A revised Table B-1
- An amended Part A
- Photo documentation demonstrating that the HWSU is empty and in good condition
- Advance notification to allow an inspection, at the Division's discretion, prior to modification approval.

HAZARDOUS WASTE FACILITY PERMIT  
 Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
 Blue Grass Army Depot  
 AI: 2805 Activity: APE20210008

**R.III.A.(3) Listed N-Codes**

The following compounds are the relevant listed hazardous wastes for the purposes of regulation of the treatment, storage, and disposal of the wastes under the delegated authority of the Resource Conservation and Recovery Act.

Code	Hazardous Waste Description
N001	GB (isopropyl methyl phosphonofluoridate)
N002	VX (O-ethyl-S-(2-diisopropylaminoethyl) methyl phosphonothiolate)
N003	H (Bis (2-chloroethyl) sulfide), and related compounds)
N101	Uncontaminated M67 rocket motor assembly, propellant component of the rocket motors, shipping firing tubes, and end-caps associated with GB munitions
N102	Uncontaminated M67 Rocket Motor Assembly, Propellant Component of the Rocket Motor, Shipping Firing Tubes, and End-Caps associated with VX munitions
N701	Lab wastes associated with treated GB wastes and GB containing lab wastes treated to destroy agent with caustic
N702	Lab Wastes associated with treated VX wastes and VX containing lab wastes treated to destroy agent with caustic
N901	Spent Decontamination Solution associated with treated GB wastes
N902	Spent Decontamination Solution associated with treated VX wastes

*[KRS 224.50-130, KRS 224.46-530, 401 KAR 39:060 Section 3]*

**R.III.A.(4) Permitted Container Storage Areas**

The following is a list of the permitted container storage areas (HWSUs) for chemical munitions and Chemical Related Hazardous Waste.

HWSU/Igloo	Notes
Container Storage PK	Unit PK shall provide storage for VX wastes that monitored to $\geq 1$ VSL
Container Storage OL	Unit OL shall provide storage for VX wastes that monitored to $\geq 1$ VSL
Container Storage N	Unit N shall provide storage for VX wastes that monitored to $\geq 1$ VSL
Container Storage O	Unit O shall provide storage for VX wastes that monitored to $\geq 1$ VSL

*[KRS 224.46-530, KRS 224.46-530, 401 KAR 39:060 Section 5]*

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 4 of 23

**R.III.A.(4)(a) Secondary Containment**

Secondary containment shall prevent any migration of wastes or accumulated liquid outside of secondary containment at any time during the use of the hazardous waste management unit.

- Containerized warheads shall be transported and stored in the skids described in Attachment D (Figure D-4).
- Spilled or leaked waste and accumulated precipitation shall be removed from the collection area immediately, in accordance with 40 CFR 264.175(b)(2) and 401 KAR 39:090, section 1.
- The Permittee shall document areas that have been exposed to agent and clean-up activities.

*[401 KAR 39:090 Section 5, 40 CFR 264.175]*

**R.III.A.(5) Environmental Releases**

The Permittee shall operate the facility to prevent an environmental release of hazardous waste or hazardous waste constituents.

*[401 KAR 39:090 Section 6, KRS 224.1-400(1)(b), KRS 224.1-400(4), KRS 224.50-130]*

**R.III.A.(6) Leaker Munitions**

External Leaker munitions that are newly discovered during transport or storage shall be placed under engineering controls during all leaker isolation activities and overpacked to prevent releases to the environment.

*[KRS 224.46-530(1)(g), KRS 224.50-130(3)]*

**R.III.A.(7) Worker Protection**

All workers within 1,000 meters of the treatment units shall be provided with an adequate level of protection against exposure to nerve agents.

*[KRS 224.50-130(3), 401 KAR 39:090 Section 6]*

**R.III.A.(8) Offsite Shipment**

The Permittee shall notify the Division prior to shipment of Rocket Motors offsite. Rocket Warheads shall not be shipped offsite.

**R.III.A.(9) Limitations of Permit**

This Permit is for storage and transportation of certain chemical munitions and munition related items. Only the following items may be stored under this permit:

- Containerized drained M56 warhead assemblies (GB and VX)
- Containerized undrained M56 warhead assemblies (GB and VX)
- Contaminated M67 rocket motor assemblies ( $\geq 1$  VSL) (GB and VX)
- Overpacked M55 115mm chemical rocket assemblies (GB and VX)
- Overpacked M121A1 155mm projectiles (VX)

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 5 of 23

- M67 rocket motor assemblies (<1 VSL) (GB and VX)
- Laboratory Wastes, spent decontamination solution, and/or debris/personal protective equipment associated with the management and/or treatment of GB or VX
- Agent-contaminated carbon filters (GB and VX)

*[KRS 224.50-130(3), 401 KAR 39:060 Section 5]*

**R.III.B. GENERAL FACILITY STANDARDS**

**R.III.B.(1) Identification Number**

KY8-213-820-105

**R.III.B.(2) Required Notices**

See Entire Facility Section

The Permittee shall notify the Division immediately in the event of a confirmed detection of agent inside a HWSU at  $\geq 1$  VSL with an action/alarm setpoint at 0.5 VSL while not under engineering controls.

**R.III.B.(3) Waste Analysis**

See Entire Facility Section

**R.III.B.(4) Security**

See Entire Facility Section

**R.III.B.(5) General Inspection Requirements**

See Entire Facility Section

**R.III.B.(6) Personnel Training**

See Entire Facility Section

**R.III.B.(7) General Requirements for Ignitable, Reactive, or Incompatible Wastes**

See Entire Facility Section

**R.III.B.(8) Location Standards**

See Entire Facility Section

**R.III.B.(9) Land Disposal Restrictions**

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 6 of 23

**R.III.B.(9)(a) LDR - Prohibitions on Storage of Restricted Waste**

The storage of hazardous wastes restricted from land disposal under 401 KAR 39:060 Section 4 is prohibited, unless the following conditions are met:

- The Permittee stores such waste on site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal.
- Each container or skid of Hazardous Waste is clearly labeled with the words "Hazardous Waste," and marked to identify its contents and the date accumulation began in that container.

*[401 KAR 39:060 Section 4 (40 CFR 268.50), KRS 224.46-520]*

**R.III.B.(9)(b) LDR - Storage Time**

Munitions storage: The Permittee may store waste restricted from land disposal for up to one (1) year in a permitted hazardous waste storage unit. The Permittee may store waste restricted from land disposal beyond one (1) year, if such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

*[401 KAR 39:060 Section 4 (40 CFR 268.50), KRS 224.46-520]*

**R.III.B.(9)(c) LDR - General Restrictions**

401 KAR 39:060 Section 4 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances in which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage, or disposal unit. The Permittee shall maintain compliance with the requirements of 401 KAR 39:060 Section 4. Where the Permittee has applied for an extension, waiver, or variance under 401 KAR 39:060 Section 4, the Permittee shall comply with all restrictions on land disposal under this part once the effective date for the waste has been reached pending final approval of such application.

*[401 KAR 39:060 Section 4 (40 CFR 268 Subpart C), KRS 224.46-520]*

**R.III.B.(9)(d) Restrict Shipment**

The Permittee shall determine if any hazardous waste generated needs to be treated before it can be land disposed. The Permittee shall provide certification with each hazardous waste shipment that the waste meets land disposal requirements or a written notice that the waste does not meet the treatment standard.

Chemical related hazardous waste shipped off-site for treatment or disposal shall comply with the Waste Analysis Plan, Attachment C of the permit application.

Off-site shipments of secondary waste with headspace monitoring resulting in greater than 1 Vapor Screening Level (VSL), shall be disposed of at an appropriately permitted TSDF with direct feed to the receiving facility's treatment unit.

The Permittee shall adhere to the requirements of the Bounding Transportation Risk Assessment as well as the DA Memorandum (Requirements for Implementation of the US Army Chemical Materials Agency Bounding Transportation Risk Analysis for Shipment of Greater Than 1 Vapor Screening Level Chemical Agent Contaminated Secondary Waste) dated 15 September 2008;

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 7 of 23

however, for greater than 0.5 IDLH shipments, the Permittee shall notify the Division and request and obtain approval from the Division prior to shipment.

*[401 KAR 39:060 Section 4 (40 CFR 268 Subpart C), KRS 224.46-530, KRS 224.50-130]*

**R.III.B.(10) Reporting Requirements**

The Permittee shall submit annual reports to the Hazardous Waste Branch, no later than 90 days after the end of each calendar year, which document the activities for that calendar year. The report shall include:

- Type and number of munitions stored in each HWSU at the end of the calendar year.
- Date, time, and concentration of any confirmed agent reading  $\geq 1$  VSL with an action/alarm set point at 0.5 VSL outside of engineering controls.

*[KRS 224.50-130(3), KRS 224.46-530(1)(g), 401 KAR 39:060 Section 5]*

**R.III.C. PREPAREDNESS AND PREVENTION**

**R.III.C.(1) Design and Operation of Facility**

The Permittee shall maintain, and operate the facility in a manner to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Containerized warheads shall not be transported when the Maximum Credible Event modeling indicates that a plume of concentration equal to AEGL-3 would cross the Depot boundary.

*[401 KAR 39:090 Section 1 (40 CFR 264.31)]*

**R.III.C.(2) Required Equipment**

The Permittee shall keep all equipment at the facility as specified in the Contingency Plan, Attachment G, including:

- An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel
- A device, such as a telephone (immediately available at the scene of operations) or a hand-held two (2) way radio, capable of summoning emergency assistance from police departments, fire departments, or state or local emergency response teams
- Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), and spill control equipment
- Water at adequate volume and pressure to supply water hose streams, foam producing equipment, or water spray systems
- For chemical agent: monitoring equipment, personal protective equipment, and decontamination solution
- Munition overpacks to contain leaking munitions

*[401 KAR 39:090 Section 1 (40 CFR 264.32), KRS 224.46-530]*

**R.III.C.(3) Testing and Maintenance of Equipment**

The Permittee shall:

- Test all emergency equipment for proper operation including communication, alarm, fire, spill control, and decontamination equipment at the facility as described in the Procedures to Prevent Hazards, Attachment F.
- Maintain all equipment at the facility in good working order, to ensure proper operation in time of emergency, consistent with the inspection schedule given in the Procedures to Prevent Hazards, Attachment F.

*[401 KAR 39:090 Section 1 (40 CFR 264.33)]*

**R.III.C.(4) Access to Communications or Alarm Systems**

When hazardous waste is being handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee. If there is only one (1) employee in a hazardous waste storage unit, they shall have immediate direct access or be in line of site of a person having immediate direct access to a telephone or hand-held two (2) way radio, capable of summoning emergency assistance.

*[401 KAR 39:090 Section 1 (40 CFR 264.34)]*

**R.III.C.(5) Required Aisle Space**

The Permittee shall maintain aisle space in each hazardous waste storage unit to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of operation inside the hazardous waste storage unit during emergencies.

*[401 KAR 39:090 Section 1 (40 CFR 264.35)]*

**R.III.C.(6) Arrangements with Local Authorities**

See Entire Facility Section

**R.III.D. CONTINGENCY PLAN AND EMERGENCY PROCEDURES**

**R.III.D.(1) Implementation of Plan**

The Permittee shall immediately carry out the provisions/procedures of the Contingency Plan, Attachment G of this application, whenever there is an imminent or actual emergency situation including a fire, explosion, or unplanned sudden or non-sudden release of any hazardous waste or hazardous waste constituents from the facility that could threaten human health or the environment, including:

- Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel
- Notify appropriate state or local agencies with designated response roles if their help is needed.

*[401 KAR 39:090 Section 1 (40 CFR 264.51, 40 CFR 264.56)]*



HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 9 of 23

**R.III.D.(2)    Content of Plan**

The Contingency Plan shall contain the following information and be kept up to date:

- Actions facility personnel shall take in response to fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water
- Arrangements agreed to by local emergency services
- Names, addresses, and phone numbers of all persons qualified to act as emergency coordinator
- List, description, and location of all emergency equipment
- Evacuation plan for facility personnel that describes signals, routes, and alternate routes

*[401 KAR 39:090 Section 1 (40 CFR 264.52)]*

**R.III.D.(3)    Copies of Plan**

A copy of the Contingency Plan, Attachment G of the application, and all revisions to the plan shall be:

- Maintained at the facility
- Provided to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services
- Provided to all outside agencies, contractors, and emergency response providers that have a Memorandum of Agreement (MOA) with the facility to provide assistance in an emergency
- Provided to the Hazardous Waste Branch Manager

*[401 KAR 39:090 Section 1 (40 CFR 264.53)]*

**R.III.D.(4)    Amendment of Plan**

The Contingency Plan, Attachment G of the application shall be reviewed and immediately amended, if necessary, whenever:

- The facility permit is revised
- The plan fails in an emergency
- The facility changes (i.e., in design, construction, operation, maintenance, etc.) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency
- The list of Emergency Coordinators changes
- The list of emergency equipment changes
- Administrative updates and/or changes as identified above to the Contingency Plan may not warrant a permit modification. These shall be submitted to the Hazardous Waste Branch Manager for determination.

*[401 KAR 39:090 Section 1 (40 CFR 264.54), 401 KAR 39:060 Section 5 (40 CFR 270.42)]*

**R.III.D.(5) Emergency Coordinator**

At all times, there shall be an Emergency Coordinator (EC) either at the facility or on call with the responsibility for coordinating all emergency response measures. The EC shall be thoroughly familiar with all aspects of the facility's Contingency Plans, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. The EC shall have the authority to commit the resources needed to carry out the Contingency Plan.

*[401 KAR 39:090 Section 1 (40 CFR 264.55)]*

**R.III.D.(6) Emergency Procedures**

**R.III.D.(6)(a) Activate Alarms**

Whenever there is an imminent or actual emergency situation, the EC (or designee) shall immediately activate internal facility alarms or communication systems, where applicable, to notify all facility personnel, and notify appropriate state and local agencies with designated response roles, as specified in the Contingency Plan.

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(b) Evaluate Scope of Release**

Whenever there is a release, fire, or explosion, the EC shall immediately identify the character, exact source, amount, and areal extent of any released materials. This evaluation may be completed by observation or review of facility records or manifests, and, if necessary, by chemical analysis.

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(c) Assess Possible Hazards to Human Health or the Environment**

The EC shall assess possible hazards to human health or the environment that may result from a release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion (for example, the effects of any toxic irritating or asphyxiating gases that are generated or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(d) Hazard to Human Health or the Environment Outside of the Facility**

If the EC determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, the findings shall be reported as follows:

- If the assessment indicates that evacuation of local areas may be advisable, appropriate local authorities shall be notified immediately. The EC shall be available to help appropriate officials decide whether local areas should be evacuated
- The EC shall immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their 24-hour toll free number 800-424-8802). The report shall include:

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 11 of 23

- Name and telephone number of reporter
- Name and address of facility
- Time and type of incident
- Name and quantity of material(s) involved, to the extent known
- The extent of injuries, if any
- The possible hazards to human health or the environment

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(e) Preventive Measures**

During an emergency, the EC shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers.

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(f) Monitoring During Halted Operations**

If the facility stops operations in response to a fire, explosion, or confirmed release, the EC shall ensure monitoring occurs for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(g) Secure Recovered Waste**

Immediately after an emergency, the EC shall provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water or ground water, or other materials that result from a release, fire, or explosion at the facility.

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(h) Recovery After Emergency**

The EC shall ensure that, in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed

*[401 KAR 39:090 Section 1 (40 CFR 264.56)]*

**R.III.D.(6)(i) Environmental Emergency Written Report**

The Permittee shall note in the Operating Record the time, date, and details of any release of

## HAZARDOUS WASTE FACILITY PERMIT

Transportation and Storage of Nerve-Agent Related Items from BGCAPP

Blue Grass Army Depot

AI: 2805 Activity: APE20210008

Page 12 of 23

hazardous waste. Within fifteen (15) calendar days of the later of the time of release, the conclusion of emergency operations, or completion of efforts to control or mitigate the release or threatened release, the Permittee shall submit a written report on the incident to the Manager and the Division Field Office. The report shall include:

- Name, address, and telephone number of the Permittee
- Name, address, and telephone number of the facility
- Name, address, and telephone number of persons having actual knowledge of the facts surrounding the release or threatened release
- Date, time, and type of incident (e.g., fire, explosion)
- Name, quantity, concentration of materials, pollutant, or contaminant involved
- Precise location, circumstances, and cause
- Extent of injuries, if any
- Assessment of actual or potential hazards to human health or the environment, and daily efforts taken by the Permittee to control or mitigate, including monitoring data
- Estimated quantity and disposition of recovered material that resulted from the incident
- Changes in equipment, procedures, personnel, etc. to prevent similar incidents
- Any other pertinent or requested information

*[401 KAR 39:090 Section 1 (40 CFR 264.56), KRS 224.1-400]*

### **R.III.D.(6)(j) Daily Notification During Environmental Emergency**

The Permittee shall notify the Division's Field Office and Hazardous Waste Branch daily during an environmental emergency operation by telephone, e-mail, or fax. The following information, at a minimum, shall be provided:

- Summary of the previous day's operations
- Summary of planned operations for the day, including monitoring and movement/handling
- Results of any monitoring since the last daily notification
- Any other pertinent or requested information

*[401 KAR 39:060 Section 5 (40 CFR 270.32), KRS 224.46-530]*

### **R.III.D.(6)(k) Memorandums of Agreements (MOAs)**

The Permittee shall keep current copies of all Memorandums of Agreement (MOAs) with off-post responders at an on-site location. If, at any time, the Permittee enters into an agreement with an off-post responder not listed in the Contingency Plan and Emergency Procedures, Attachment G, of the permit application, or does not renew an agreement with an off-post responder listed in the Contingency Plan, then the Permittee shall notify the Manager.

*[401 KAR 39:090 Section 1 (40 CFR 264.52)]*

### **R.III.E. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING**

See Entire Facility Section

### **R.III.F. MONITORING REQUIREMENTS**

**HAZARDOUS WASTE FACILITY PERMIT**  
 Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
 Blue Grass Army Depot  
 AI: 2805 Activity: APE20210008

**R.III.F.(1) Groundwater Monitoring Requirements**

**R.III.F.(2) Air Monitoring Requirements**

The Permittee shall operate agent monitoring systems in accordance with the Permit Application. Monitoring discussed in this permit shall be conducted to 1 VSL with an action/alarm setpoint at 0.5 VSL.

Airborne exposure limits for chemical warfare agents are below:

Level	GPL <sup>(a)</sup>	WPL <sup>(b)</sup>	STEL <sup>(c)</sup>	VSL <sup>(d)</sup>	IDLH <sup>(g)</sup>	AEGL-3 <sup>(h)</sup>	AEGL-2 <sup>(i)</sup>	AEGL-1 <sup>(j)</sup>
Averaging Time	24 hrs.	8 hrs.	15 min	NA	NA	60 min	60 min	60 min
GB (mg/m <sup>3</sup> )	1x10 <sup>-6</sup>	3x10 <sup>-5</sup>	1x10 <sup>-4</sup>	1x10 <sup>-4</sup>	0.10	0.13	0.035	2.8x10 <sup>-3</sup>
VX (mg/m <sup>3</sup> )	6x10 <sup>-7</sup>	1x10 <sup>-6</sup>	1x10 <sup>-5</sup>	1x10 <sup>-5</sup>	3x10 <sup>-3</sup>	0.010	2.9x10 <sup>-3</sup>	1.7x10 <sup>-4</sup>
Monitoring Method	Historic <sup>(e)</sup>	Historic <sup>(e)</sup>	NRT <sup>(f)</sup>	NRT <sup>(f)</sup>	Historic <sup>(e)</sup>	Historic <sup>(e)</sup>	Historic <sup>(e)</sup>	Historic <sup>(e)</sup>

- (a) GPL is the General Population Limit and is an airborne agent exposure limit for the general population
- (b) WPL is Worker Population Limit and is an airborne agent exposure limit for the worker population
- (c) STEL is Short Term Exposure Limit and is a concentration based on a 15-minute exposure for an unprotected worker but is evaluated with an instrument using the shortest analytic cycle time practical to obtain accurate results. Since most NRT cycle times are less than 15min (typically 5-6 min), confirmed readings and durations are used to calculate whether the STEL has been reached or exceeded.
- (d) VSL is Vapor Screening Level and is an agent vapor concentration-only value independent of time. As such, it is used to define a level of contamination for items, wastes, engineering controls systems (for example, filter beds and vestibules) and facilities under specific environmental conditions. VSL is the readout level of certain NRT monitors and the value is applied to process or operational monitoring as opposed to worker exposure.
- (e) Historic monitoring is used when the sample analyzed represents an extended period of time and the results are not known until laboratory analysis is completed after the sampling event has been completed.
- (f) NRT is Near Real-Time monitoring and is conducted with instruments that have the capability to collect, analyze, and report or display results within 15 minutes. They also provide audible and remote alarms when levels are detected at, or above, a specific alarm set point.
- (g) IDLH is Immediately Dangerous to Life and Health and is defined by the US National Institute for Occupational Safety and Health (NIOSH) as exposure to airborne contaminants that is "likely to cause death or immediate or delayed permanent adverse health effects or prevent escape from such an environment." IDLH is a concentration-only time independent value.
- (h) AEGL-3 is an Acute Exposure Guideline Level above which concentration has life-threatening health effects or death
- (i) AEGL-2 is an Acute Exposure Guideline Level above which concentration has irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape.
- (j) AEGL-1 is an Acute Exposure Guideline Level above which concentration has notable discomfort, irritation, or certain asymptomatic non-sensory effects.

[401 KAR 39:060 Section 5 (40 CFR 270.31)]

**R.III.G. CLOSURE & POST-CLOSURE**

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805 Activity: APE20210008

Page 14 of 23

See Entire Facility Section and Attachment I of the application

The Permittee shall submit the following to the Division for approval at least 180 days prior to beginning closure activities:

1. Detailed Sampling Plan for all Chemical Hazardous Waste Storage Units
2. Updated Detailed Closure Plan
3. Updated Closure Schedule

**R.III.H. FINANCIAL REQUIREMENTS**

Not Applicable

**R.III.I. USE AND MANAGEMENT OF CONTAINERS**

**R.III.I.(1) Condition of Containers**

If a container holding chemical related (non-munition) hazardous waste is not in good condition (i.e., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall:

- Transfer the hazardous waste from this container to a container that is in good condition, or
- Use drum overpacks with volumes that do not exceed 85 gallons

Leaking chemical munitions shall be placed in approved overpacks described in Process Information, Attachment D of the application. The leaking munitions shall be handled as described in Procedures to Prevent Hazards, Attachment F of the application.

*[401 KAR 39:080 Section 1 (40 CFR 262.30), 401 KAR 39:090 Section 1 (40 CFR 264.171)]*

**R.III.I.(2) Compatibility of Waste with Containers**

The Permittee shall use containers made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired. The Permittee shall conduct necessary testing and analysis in accordance with the Waste Analysis Plan, Attachment C of the application, in order to ensure that materials stored in permitted container storage areas are compatible.

*[401 KAR 39:090 Section 1 (40 CFR 264.172)]*

**R.III.I.(3) Management of Containers**

**R.III.I.(3)(a) Container Storage Area**

The Permittee shall operate, maintain, and inspect the Chemical Hazardous Waste Storage Units (HWSUs) in the Chemical Limited Area, as specified under the Process Information, Attachment D of the application.

- Spilled or leaked waste and accumulated precipitation shall be removed from the collection area in as timely a manner as necessary to prevent overflow of the collection system
- The drains of the Chemical Waste Hazardous Storage Units collection area shall remain closed or blocked

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart I)]*

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 15 of 23

**R.III.I.(3)(b) Container Total Volume**

The Permittee shall ensure that any products or non-hazardous wastes stored in a permitted Chemical Hazardous Waste Storage Unit are counted toward the total permitted container storage volume. The Permittee shall maintain inventories to ensure that permitted storage capacities are not exceeded.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart I)]*

**R.III.I.(3)(d) Container Waste Restriction**

The Permittee shall only store those hazardous wastes streams specified in this permit for the Chemical Hazardous Waste Storage Units (Igloos).

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart I)]*

**R.III.I.(3)(e) Performance Oriented Packaging (POP)**

The Permittee shall store non-munition, hazardous waste in containers that meet Performance Oriented Packaging standards as specified by the Department of Transportation (DOT) requirements.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart I)]*

**R.III.I.(3)(f) Container Closed**

A container holding Chemical Related Hazardous Waste shall always be closed during storage except when it is necessary to add or remove waste. Chemical Munitions shall not be opened except as identified in Process Information, Attachment D of the application.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart I)]*

**R.III.I.(3)(g) Container Handling**

A container holding hazardous waste shall not be opened, handled, or stored in a manner which may rupture the container or cause it to leak. Chemical Munitions shall only be moved in accordance with Process Information, Attachment D of the application.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart I)]*

**R.III.I.(3)(f) Container Labeling**

Containers shall be labeled in accordance with 401 KAR 39:080 Section 1.

A container holding Chemical Related Hazardous Waste shall be labeled "Hazardous Waste" and the date that hazardous waste is first added to the container. In lieu of labeling each individual warhead canister, the skid shall be labeled "Hazardous Waste" and the date that hazardous waste is first added to the skid.

In the case that the skid is later broken up, each container shall be labeled with the same information that was on the skid.

## HAZARDOUS WASTE FACILITY PERMIT

Transportation and Storage of Nerve-Agent Related Items from BGCAPP

Blue Grass Army Depot

AI: 2805 Activity: APE20210008

Page 16 of 23

Chemical munitions placed in overpacks after the date of issuance of this permit, shall be labeled "Hazardous Waste" and the date that hazardous waste is first added to the overpack. Additional labeling shall clearly identify the content of the overpack.

Containers shall be positioned so that labels are visible and easy to inspect.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart I)]*

### R.III.I.(4) Inspections

The container storage areas shall be maintained and operated to allow compliance with the inspection and container management requirements described in Attachment F, Procedures to Prevent Hazards, including maintaining the inspection forms in an operating log and ensuring containers are positioned so that the labels are clearly visible

The permittee inspection procedures shall be based upon Attachment F:

Container Storage Unit Description	Types of Problems	Inspection Type and Frequency
Chemical HWSUs/igloos storing containers that hold liquid agent, overpacked chemical munitions and munitions components, or $\geq 1$ VSL waste	<ul style="list-style-type: none"><li>• Deterioration of containers</li><li>• Leaks/vapor emissions</li><li>• Igloo apron deteriorated</li><li>• Water infiltration</li></ul>	<ul style="list-style-type: none"><li>• Weekly air monitoring</li><li>• Quarterly visual inspection</li></ul>
Empty Chemical HWSUs containing no hazardous waste, or non-operating HWSUs	<ul style="list-style-type: none"><li>• Broken or missing security seal</li><li>• Presence of containers</li><li>• Igloo leaks</li><li>• Igloo apron deteriorated</li></ul>	<ul style="list-style-type: none"><li>• Weekly visual, unless security seal places on door</li><li>• Security seal checked weekly. If seal is removed, or broken, visual inspection conducted</li></ul>
Chemical Limited Area HWSUs (structural inspection)	<ul style="list-style-type: none"><li>• Leaks, cracks, structural deficiencies</li><li>• Igloos apron deteriorated, vents</li></ul>	Annual visual inspection
Chemical HWSUs containing uncontaminated Rocket Motors or other $<1$ VSL waste	<ul style="list-style-type: none"><li>• Deterioration of containers</li><li>• Igloo apron deteriorated</li><li>• Water infiltration</li></ul>	Weekly visual inspection

*[401 KAR 39:090 Section 1 (40 CFR 264.174)]*

### R.III.I.(5) Containment System

The containment system in the Chemical Hazardous Waste Storage Units in the Chemical Limited Area shall be designed and operated as follows:



**HAZARDOUS WASTE FACILITY PERMIT**  
 Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
 Blue Grass Army Depot  
 AI: 2805 Activity: APE20210008

- The containment system shall be designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation
- The secondary containment system shall have sufficient capacity to contain ten (10) percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination.

*[401 KAR 39:090 Section 1 (40 CFR 264.174, 40 CFR 264.175), KRS 224.50-130]*

**R.III.I.(6) Special Requirements for Ignitable or Reactive Waste**

Containers holding ignitable or reactive waste shall be located at least fifteen (15) meters from the facility's property line.

*[401 KAR 39:090 Section 1 (40 CFR 264.176)]*

**R.III.I.(7) Special Requirements for Incompatible Waste**

- Hazardous Waste Storage Units in the Chemical Limited Area shall not mix munitions or DOT bottles containing GB or VX in the same igloo.
- Incompatible Chemical Related Hazardous Waste and materials shall not be placed in the same container.
- Chemical Related Hazardous Waste shall not be placed in an unwashed container that previously held an incompatible waste or material.
- A storage container holding a Chemical Related Hazardous Waste that is incompatible with any waste or materials stored nearby in other containers, shall be separated from the incompatible materials, or protected from them by means of a dike, berm, wall, or other engineering controls.

*[401 KAR 39:090 Section 1 (40 CFR 264.177)]*

**R.III.I.(8) Removal At Closure**

At closure, the Permittee shall remove all hazardous waste residues from the containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues shall be decontaminated or removed from the facility in accordance with the Closure Plan, Attachment I of the application.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart G)]*

**R.III.I.(9) Permitted Container Storage Units and Volume**

The Permittee shall not exceed the total permitted container capacity specified in this permit at any time. The Permittee shall not store wastes associated with GB in the same Chemical Hazardous Waste Storage Unit as wastes associated with VX. Wastes that monitor < 1 VSL shall not be stored in the same HWSU as ≥ 1 VSL wastes, or they shall also be considered ≥ 1 VSL waste. The permitted capacities for storage are as follows:

Condition No.	Unit Name	Description of Hazardous Wastes	EPA Hazardous Waste Number	Maximum Number and Type of Containers

**HAZARDOUS WASTE FACILITY PERMIT**  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805 Activity: APE20210008

R.III.I.(9).(a)	Chemical Hazardous Waste Storage Igloo PK	Containerized M56 VX Rocket Warhead Assemblies, and/or M67 Rocket Motor Assemblies, and/or VX M55 Rocket Assemblies in SRCs, 155 mm VX Projectiles in SRCs, Propellant Component of the Rocket Motor, Shipping and Firing Tubes, End-Caps, Lab Wastes and/or Spent Decontamination Solution associated with the management and/or treatment of VX, VX Contaminated carbon filters, and/or miscellaneous compounds associated with the management or treatment of VX	D001, D003, D005, D008, D030, N002, N102, N702, N902, D004, D006, D007, D009, D010, D011, D018, D022, D035, D036, D037, D039, D040, D043, F001, F002, F003, F004, U002, U044, U103, U127, U131, U154, U210	Total volume shall not exceed 3,831 gallons liquid.  For igloos containing Rocket Motors/Shipping and Firing Tubes, the maximum capacity is 100 boxes of 30 RMs for a maximum of 3000 rocket motors  For igloos containing containerized WHs, the maximum capacity is 129 skids, each containing up to 25 containerized warheads for a maximum of 3,225 warheads.
R.III.I.(9).(b)	Chemical Hazardous Waste Storage Igloo OL	Containerized M56 VX Rocket Warhead Assemblies, and/or M67 Rocket Motor Assemblies, and/or VX M55 Rocket Assemblies in SRCs, 155 mm VX Projectiles in SRCs, Propellant Component of the Rocket Motor, Shipping and Firing Tubes, End-Caps, Lab Wastes and/or Spent Decontamination Solution associated with the management and/or treatment of VX, VX Contaminated carbon filters, and/or miscellaneous compounds associated with the management or treatment of VX	D001, D003, D005, D008, D030, N002, N102, N702, N902, D004, D006, D007, D009, D010, D011, D018, D022, D035, D036, D037, D039, D040, D043, F001, F002, F003, F004, U002, U044, U103, U127, U131, U154, U210	Total volume shall not exceed 3,831 gallons liquid.  For igloos containing Rocket Motors/Shipping and Firing Tubes, the maximum capacity is 100 boxes of 30 RMs for a maximum of 3000 rocket motors  For igloos containing containerized WHs, the maximum capacity is 129 skids, each containing up to 25 containerized warheads for a maximum of 3,225 warheads.
R.III.I.(9).(c)	Chemical Hazardous Waste Storage Igloo N	Containerized M56 VX Rocket Warhead Assemblies, and/or M67 Rocket Motor Assemblies, and/or VX M55 Rocket Assemblies in SRCs, 155 mm VX Projectiles in SRCs, Propellant Component of the Rocket Motor, Shipping and Firing Tubes, End-Caps, Lab Wastes and/or Spent Decontamination Solution associated with the management and/or treatment of VX, VX Contaminated carbon filters, and/or miscellaneous compounds associated with the management or treatment of VX	D001, D003, D005, D008, D030, N002, N102, N702, N902, D004, D006, D007, D009, D010, D011, D018, D022, D035, D036, D037, D039, D040, D043, F001, F002, F003, F004, U002, U044, U103, U127, U131, U154, U210	Total volume shall not exceed 3,831 gallons liquid.  For igloos containing Rocket Motors/Shipping and Firing Tubes, the maximum capacity is 100 boxes of 30 RMs for a maximum of 3000 rocket motors  For igloos containing containerized WHs, the maximum capacity is 129 skids, each containing up to 25 containerized warheads for a maximum of 3,225 warheads.
R.III.I.(9).(d)	Chemical Hazardous Waste Storage Igloo O	Containerized M56 VX Rocket Warhead Assemblies, and/or M67 Rocket Motor Assemblies, and/or VX M55 Rocket Assemblies in SRCs, 155 mm VX Projectiles in SRCs, Propellant Component of the Rocket Motor, Shipping and Firing Tubes, End-Caps, Lab Wastes and/or Spent Decontamination Solution associated with the management and/or treatment of VX, VX Contaminated carbon filters, and/or miscellaneous compounds associated with the management or treatment of VX	D001, D003, D005, D008, D030, N002, N102, N702, N902, D004, D006, D007, D009, D010, D011, D018, D022, D035, D036, D037, D039, D040, D043, F001, F002, F003, F004, U002, U044, U103, U127, U131, U154, U210	Total volume shall not exceed 3,831 gallons liquid.  For igloos containing Rocket Motors/Shipping and Firing Tubes, the maximum capacity is 100 boxes of 30 RMs for a maximum of 3000 rocket motors  For igloos containing containerized WHs, the maximum capacity is 129 skids, each containing up to 25 containerized warheads for a maximum of 3,225 warheads.

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805 Activity: APE20210008

Page 19 of 23

R.III.J. TANK SYSTEMS	(RESERVED)
R.III.K. SURFACE IMPOUNDMENTS	(RESERVED)
R.III.L. WASTE PILES	(RESERVED)
R.III.M. LAND TREATMENT	(RESERVED)
R.III.N. LANDFILLS POST CLOSURE REQUIREMENTS	(RESERVED)
R.III.O. INCINERATORS/BIF	(RESERVED)
R.III.P.	(RESERVED)
R.III.Q.	(RESERVED)
R.III.R.	(RESERVED)
R.III.S. SPECIAL PROVISIONS FOR CLEANUP	(RESERVED)
R.III.T.	(RESERVED)
R.III.U.	(RESERVED)
R.III.V.	(RESERVED)
R.III.W. DRIP PADS	(RESERVED)

**R.III.X. MISCELLANEOUS UNIT – TRANSPORTATION AS TREATMENT**

**R.III.X.(1) Definition**

KRS 224.50-130 states the following: *"In addition to the definition of the term as defined in this chapter, the term "treatment", as used in this section, shall include the manual or mechanical handling of the chemical compounds listed in subsection (2) of this section and of any munitions containing the compounds during the processing of munitions to remove the compounds, to separate munitions components, and to otherwise prepare the components and compounds for destruction, neutralization, dismantling, or decommissioning. The term "treatment" shall not include the handling, movement, or over-packing of containers or munitions containing a compound listed in subsection (2) of this section within the fenced boundaries of an area used for the storage of those munitions if:*

*A plan for the handling, movement, or overpacking is submitted and approved by the cabinet, after public notice and opportunity to be heard, before the handling, movement, or over-packing occurs; or*

*An emergency has occurred and the handling, movement, or overpacking is necessary to protect human health, safety, or the environment, if a report describing the handling, movement, or overpacking is submitted to the cabinet as soon as possible after the emergency is abated."*

*Subsection (2) states:.....shall list the following compounds as hazardous wastes for the purposes of regulation of the treatment, storage, and disposal of the wastes under the delegated authority of the Resource Conservation and Recovery Act, 42 U.S.C. 6901 et seq.: GB (isopropyl methyl phosphonoflouridate); VX (O-ethyl-S- (2-diisopropylaminoethyl) methyl phosphonothiolate); and H (bis(2-chloroethyl) sulfide) and related compounds.*

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Based upon the Kentucky statute, transportation of chemical agent-filled items (i.e., projectiles, rocket warheads, over-packs and DOT 3A bottles) is regulated as treatment under existing Commonwealth of Kentucky environmental regulations and shall comply with applicable Kentucky and Federal hazardous waste treatment regulations.

*KRS 224.50-130(5)*

**R.III.X.(2) Movement**

Part D of the application, Attachment D, and Appendix 1-3 and 1-4 of the application, Attachment O, shall be followed for the process of munitions and munition related items movement from the Main Plant to the Chemical HWSUs and movement from Chemical HWSUs to an SDC or SDC service magazines.

**R.III.Y.** **(RESERVED)**

**R.III.Z.** **(RESERVED)**

**R.III.AA. AIR EMISSION STANDARDS FOR PROCESS VENTS**

This requirement is not applicable. Per the application, the Permittee does not operate any closed vent systems that are subject to requirements of 40 CFR Subpart AA under this permit.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart AA)]*

**R.III.BB. AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS**

This requirement is not applicable. Per the application, the Permittee does not operate any equipment that is subject to requirements of 40 CFR Subpart BB, which applies to equipment that contacts hazardous wastes with organic concentrations of at least 10% by weight.

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart BB)]*

**R.III.CC. AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS**

This requirement is not applicable. Per the application, the Permittee does not operate any hazardous waste management units that are subject to requirements of 40 CFR Subpart CC, which applies to equipment that contacts hazardous wastes with organic concentrations of 500 parts per million by weight (ppmw) or more.

All containers permitted for storage in the CLA igloos have a design of less than 0.1 m<sup>3</sup> and are excluded from regulation under Subpart CC

*[401 KAR 39:090 Section 1 (40 CFR 264 Subpart CC)]*

**R.III.DD. CONTAINMENT BUILDINGS** **(RESERVED)**

**R.III.EE. HAZARDOUS WASTE MUNITIONS AND EXPLOSIVES STORAGE** **(RESERVED)**

**PART IV**  
**CORRECTIVE ACTION FOR SWMUs AND AOCs**

See Entire Facility Section

**PART V**  
**REFERENCED ATTACHMENTS**

**R.V.A. REFERENCED ATTACHMENTS**

**R.V.A. Attachment A, Part A (Rocket Warhead Transportation and Storage)**

Part A of the application is incorporated as Attachment A of this permit.

*[KRS 224.46:530]*

**R.V.B. Attachment B, Facility Description, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part B of the Permit Application, Facility Description, is incorporated as Attachment B of this permit.

*[KRS 224.46-530]*

**R.V.C. Attachment C, Waste Analysis Plan, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

The Part C of the Permit Application, Waste Analysis Plan, is incorporated as Attachment C of this permit.

*[KRS 224.46-530]*

**R.V.D. Attachment D, Process Information, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part D of the Permit Application, Process Information, is incorporated as Attachment D of this permit.

*[KRS 224.46-530]*

**R.V.E. RESERVED**

**R.V.F. Attachment F, Procedures to Prevent Hazards, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part F of the Permit Application, Procedures to Prevent Hazards, is incorporated as Attachment F of

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805 Activity: APE20210008

Page 22 of 23

this permit.

*[KRS 224.46-530]*

**R.V.G. Attachment G, Contingency Plan, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

1. Part G of the Application, Contingency Plan, is incorporated as Attachment G-1 of this permit.
2. The Chemical Accident of Incident Response and Assistance (CAIRA) Plan is incorporated as Attachment G-2 of this permit.

*[KRS 224.46-530]*

**R.V.H. Attachment H, Personnel Training, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part H of the Permit Application, Personnel Training, is incorporated as Attachment H of this permit.

*[KRS 224.46-530]*

**R.V.I. Attachment I, Closure Plan, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part I of the Permit Application, Closure Plan, is incorporated as Attachment I of this permit.

*[KRS 224.46-530]*

**R.V.J. Attachment J, Other Federal Laws, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part J of the Permit Application, Other Federal Laws, is incorporated as Attachment J of this permit.

*[KRS 224.46-530]*

**R.V.K. Attachment K, Waste Minimization, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part K of the Permit Application, Waste Minimization Program, is incorporated as Attachment K of this permit.

*[KRS 224.46-530]*

**R.V.L. Attachment L, Signatures, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

Part L of the Permit Application, Permittee Signatures, is incorporated as Attachment L of this permit.

*[KRS 224.46-530]*

**R.V.M. Attachment M, Comparison of Transport Methods Whitepaper, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

HAZARDOUS WASTE FACILITY PERMIT  
Transportation and Storage of Nerve-Agent Related Items from BGCAPP  
Blue Grass Army Depot  
AI: 2805    Activity: APE20210008

Page 23 of 23

Attachment 1 of the Permit Application, whitepaper *Comparison of Transport Methods for Warheads That Have Been De-mated From Rocket Motor and Sealed in Canisters* is incorporated as Attachment M of this permit

[KRS 224.46-530]

**R.V.N      Attachment N, Hazard Distance Risk Management Analysis, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

1. Appendix 1-1 of the Permit Application, Risk Management Analysis: Hazard Distance Estimates for Two Evaporation Scenarios Involving Drained GB M55 Rocket Warheads, is incorporated as Attachment N-1 of this permit.
2. Appendix 1-2 of the Permit Application, Risk Management Analysis: Hazard Distance Estimates for Two Evaporation Scenarios Involving Undrained GB M55 Rocket Warheads, is incorporated as Attachment N-2 of this permit.

[KRS 224.46-530]

**R.V.O      Attachment O, Development of Maximum Credible Events, (Transportation and Storage of Nerve Agent-Related Items from BGCAPP)**

1. Appendix 1-3 of the Permit Application, Development of Maximum Credible Events for Movement of Punched and Drained Palletized M55 Rocket Warheads at BGCAPP, is incorporated at Attachment O-1 of this permit.
2. Appendix 1-4 of the Permit Application, Development of Maximum Credible Events for Movement of Undrained, Palletized M55 Rocket Warheads at BGCAPP, is incorporated as Attachment O-2 of this permit.

[KRS 224.46-530]

**PART VI  
WASTE MINIMIZATION**

See Entire Facility Section