

Fact Sheet
Tentative Hazardous Waste Permit Actions
Containerization of Rocket Warheads,
Treatment of VX Rockets, Addition of Vertical Rocket Cutting Machine,
and Addition of ACWA Storage Facilities
Blue Grass Army Depot (BGAD)
Richmond, Madison County, Kentucky
EPA ID KY8-213-820-105, AI 2805
March 12, 2021

The Kentucky Energy and Environment Cabinet, Division of Waste Management (Division), has tentatively approved four significant permit modifications to the Hazardous Waste Permit issued to the Blue Grass Army Depot (BGAD). The permitting process is governed by the requirements of the federal Resource Conservation and Recovery Act (RCRA) and Commonwealth of Kentucky statutes and regulations. The permit modifications are for the chemical weapon disposal facility known as the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP). The four permit modifications are:

1. **Rocket Warhead Containerization.** Details of the proposed permit action are contained in an application entitled Class 3 Hazardous Waste Storage & Treatment Permit Modification Request, Change in Rocket Management and Miscellaneous Permit Updates dated November 16, 2020. This permit modification request includes the following items:
 - a. Elimination of equipment in the BGCAPP Main Plant Munitions Demilitarization Building (MDB) associated with the destruction of energetics.
 - b. Elimination of equipment in the Supercritical Water Oxidation (SCWO) Process Building (SPB) associated with destruction of energetics hydrolysate and use of energetics hydrolysate surrogate in the SCWO process.
 - c. Addition of a Rocket Warhead Containerization System (RWCS).
 - d. Tray/Container Transfer Room, increase in RCRA permitted storage from 550 gallons to 1300 gallons.
 - e. Explosive Containment Rooms 1 & 2, increase in RCRA permitted storage capacity from 55 gallons to 70 gallons per room.
 - f. Energetics Batch Hydrolyzer Room, addition of 450 gallons of RCRA permitted storage.
 - g. Toxic Maintenance Area Equipment Room, addition of 1,100 gallons of RCRA permitted storage.
 - h. Unpack Area (UPA) Equipment Room, addition of 1,100 gallons of RCRA permitted storage.
 - i. MWS Reject Table, change in RCRA permitted storage from 5 gallons to Munitions Washout System RCRA permitted storage 2755 gallons.
 - j. Off-Gas Treatment System – Energetics, addition of 2,750 gallons of RCRA permitted storage.
 - k. Off-Gas Treatment System for the Metal Parts Treater, addition of 2,750 gallons of RCRA permitted storage.
 - l. Allow OTM Condensate routed to the SCWO Effluent tanks to be processed through the reverse osmosis (RO) system for water recovery for use in SCWO quench.
 - m. Update of RCRA Critical Operating Parameters.
 - n. Update of Part A waste codes to be consistent with changes in this PMR, Kentucky listed waste codes in 401 KAR 39:060, and the previously submitted Research, Development, and Demonstration (RD&D) permit application, subsequent RD&D PMR submittals, the Container Storage Facility (CSF) permit modification request, and the Rocket Motor Storage (RMS) permit modification request.
2. **Treatment of VX Rockets.** Details of the proposed permit action are contained in an application entitled Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Treatment of VX Rockets dated December 17, 2020. This permit modification request includes the following items:
 - a. Transport of M55 rockets containing the nerve agent VX from Blue Grass Chemical Activity (BGCA) to the BGCAPP Main Plant facility Container Handling Building (CHB).
 - b. Treatment of M55 rockets containing VX in the Munitions Demilitarization Building (MDB).
 - c. Treatment of drained VX agent in the MDB and subsequent management of VX agent hydrolysate in the Hydrolysate Storage System (HSS) tanks.
 - d. Transport of containerized VX warheads to BGCA for storage prior to treatment in one of the Static Detonation Chamber units.
3. **Addition of Vertical Rocket Cutting Machines.** Details of the proposed permit action are contained in an application entitled Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Vertical Rocket Cutting Machines

and Rocket Non Destructive Examination dated November 19, 2020. This permit modification request includes the following items:

- a. Substitution of four vertical rocket cutting machines (VRCMs) for the two existing rocket cutting machines in the MDB.
 - b. Addition of rocket non-destructive evaluation (RNDE) technology to evaluate M55 rockets for chemical agent liquid leaks prior to processing in the VRCMs.
4. **Transport and Storage of Nerve Agent-Related Wastes.** Details of the proposed permit action are contained in an application entitled Module IX: Transportation and Storage of Nerve Agent-Related Items from the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) dated December 2020. This permit modification request includes the following items:
- a. Transfer of operational control for certain Chemical Limited Area (CLA) igloos from the Blue Grass Chemical Activity (BGCA) to the Assembled Chemical Weapons Alternatives (ACWA).
 - b. Transport of containerized VX and GB rocket warheads and other associated wastes via flatbed trucks from the BGCAPP Main Plant to the CLA Igloos and then from the CLA igloos to a Static Detonation Chamber (SDC) unit for destruction.
 - c. Storage of containerized VX and GB rocket warheads and other associated wastes in the CLA igloos.

The Blue Grass Army Depot (BGAD) is the owner of the facility. BGAD is located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The BGAD facility contact is Joe Elliott (859) 779-6374. Bechtel Parsons Blue Grass Joint Venture (BPG) is the operator of the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP). The BPG 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 in April 1942 during World War II by the War Department as an ordnance supply depot. BGAD has other permitted hazardous waste storage and treatment units in addition to the chemical agent destruction facilities.

III. Basis of the Draft Permits

The Division has reviewed the permit applications shown above, has determined that they are technically complete, and has tentatively decided to issue hazardous waste permit modifications for the transportation, storage and treatment activities.

The draft permit actions include conditions required under RCRA and the Commonwealth of Kentucky statutes and regulations to ensure that all hazardous waste treatment, storage and disposal activities are protective of human health and the environment.

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 **March 14, 2021**.

Due to the Covid-19 pandemic, a public meeting will be conducted virtually. The public meeting will be hosted by the Kentucky Division of Waste Management, and will begin at **6:00 PM on Wednesday, April 21, 2021**. The meeting will be followed immediately by a public hearing, if anyone wishes to make formal comments at that time.

The public meeting will be held online, using the GoToMeeting platform.

There are two ways to join the meeting:

- Connect online using this link: <https://global.gotomeeting.com/join/899511221>

- Connect using your telephone: [+1 \(872\) 240-3212](tel:+1(872)240-3212) **Access Code:** 899-511-221

Access to the meeting will be available starting at 5:30 PM on the day of the meeting, if you want to test your connection prior to the start of the meeting.

If you have any questions, please contact either:

- Brandon May, at Brandon.may@ky.gov or 502-782-7010
- Dale Burton, at dale.burton@ky.gov or 502-782-6331

The public comment period will end on **April 28, 2021**.

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 St., Richmond, KY 40475, (859) 623-6704**
2. **Eastern Kentucky University, John G. Crabbe Library, 457 University Dr., Room 306, Government Documents Section, Richmond, KY 40475, 859-622-2068**
3. **Berea College, Hutchins Library, Campus Dr., Berea, KY 40403, (859) 985-3364**
4. **Madison Co. Public Library, Berea, 319 Chestnut St., Berea, KY 40403, (859) 986-7112**
5. **Estill County Public Library, 246 Main St., Irvine, KY 40336 (606) 723-3030**

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.

Division of Waste Management web site: <https://eec.ky.gov/Environmental-Protection/Waste/hazardous-waste/Pages/BGAD-Project-Documents.aspx>

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:

Brandon May
Kentucky Energy and Environment Cabinet
Division of Waste Management
300 Sower Boulevard
Frankfort, Kentucky 40601
(502) 782-7010
Email: brandon.may@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 modifications. 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 final 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.

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 johnf.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.