

DEPARTMENT OF THE ARMY

BLUE GRASS ARMY DEPOT 431 BATTLEFIELD MEMORIAL HIGHWAY RICHMOND, KENTUCKY 40475

June 15, 2021

SUBJECT: Class 1 Permit Modification Request Requiring Approval - Main Plant - Pilot

Test Demonstration Report, VX Projectiles

Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP)

Blue Grass Army Depot (BGAD)

EPA ID #KY8-213-820-105, AI #2805 SDN: 24915-00-TKD-GGPT-20428

Commonwealth of Kentucky
Department for Environmental Protection
Division of Waste Management
Hazardous Waste Branch
ATTN: Ms. April J. Webb, PE, Manager
300 Sower Boulevard, 2nd Floor
Frankfort, KY 40601

Dear Ms. Webb:

Pursuant to the BGCAPP permit requirements and 401 KAR 39:060, Section 5 (incorporating 40 CFR § 270.42(a)), approval is requested for the attached Class 1 permit modification (40 CFR § 270.42, Appendix I). A document that provides justification for the permit modification request and other information required by 401 KAR 39:060, Section 5, is also attached.

If you have any questions or require additional information, please contact Mr. Ramesh Melarkode, BGAD Environmental Chief, at (859) 779-6268, or Mr. John McArthur, Bechtel Parsons Blue Grass (BPBG) Environmental Manager, at (859) 625-6447.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the SUBJECT: Class 1 Permit Modification Request Requiring Approval - Main Plant - Pilot

Test Demonstration Report, VX Projectiles

SDN: 24915-00-TKD-GGPT-20428

best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Digitally signed by: Hink, DN: CN = Hink, Ronald C = US O = Bechtel Global Corporation

Date: 2021.06.15 09:27:55 -

Ron Hink **Project Manager Bechtel Parsons Blue Grass BGCAPP** Operator

Enclosures

CC:

Candace Coyle, PEO ACWA Jeff Kreisa, PEO ACWA Brian Ballard, PEO ACWA Todd Williams, PEO ACWA Joe Elliott, BGAD Ramesh Melarkode, BGAD John McArthur, BPBG

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N.DON.110232 2327272 Date: 2021.06.15 17:11:37

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Stephen D. Dorris Colonel, U.S. Army Commanding **BGCAPP** Owner

Class 1 Permit Modification Request(s) – 24915-00-TKD-GGPT-20428

Facility: Main Plant

SDN: 24915-SYS-5RP-00-00016 Rev. 0

Item No.: 1324 BB/CC: No OPSEC: No ITAR/EAR: No

Change No.: N/A

Justification: Project Maturation

Appendix I Listing: 40 CFR §270.42(d); Class 1 modifications apply to minor changes that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment.

Title: PILOT TEST DEMONSTRATION REPORT, VX PROJECTILES

Description: VX PROJECTILE FINAL NON-AGENT AIR EMISSIONS REPORT PROVIDED PER THE PILOT TEST DEMONSTRATION PLAN (PTDP) AND MAIN PLANT CSI #2.

Affected Permit Cond. or Attach.: Main Plant Appendix A - Compliance Schedule for Main Plant Permit

Location of Mod. in Permit: N/A
