

24915-00-GPE-GGPT-00300

Resource Conservation and Recovery Act (RCRA)
**Class 2 Hazardous Waste Storage & Treatment Permit
Modification Request, Vertical Rocket Cutting
Machines and Rocket Non Destructive Examination**

for the Blue Grass Chemical Agent-Destruction Pilot Plant
Blue Grass Army Depot, Richmond, Kentucky

EPA ID KY8-213-820-105



Submitted To:

Energy and Environment Cabinet
Kentucky Department for Environmental Protection
Division of Waste Management
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1.0 OVERVIEW

This document contains a Class 2 permit modification request (PMR) for use of Vertical Rocket Cutting Machines (VRCMs) in place of Rocket Cutting Machines (RCMs) and addition of Rocket Non-Destructive Examination (RNDE) of rockets in the Munitions Demilitarization Building (MDB) at the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) Main Plant facility located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The Bechtel Parsons Blue Grass (BPBG) Joint Venture is the operator of the BGCAPP and is a Co-Permittee with Blue Grass Army Depot (BGAD) under the Resource Conservation and Recovery Act (RCRA) Part B Permit (EPA ID #KY8-213-820-105, AI #2805) issued by the Kentucky Department for Environmental Protection, Division of Waste Management.

This PMR is being submitted in accordance with 401 Kentucky Administrative Regulation (KAR) 39:060, Section 5 (incorporating Title 40 Code of Federal Regulations (CFR) § 270.42). The following changes are requested:

- Substitution of four VRCMs for the two existing RCMs in the MDB.
- Addition of RNDE technology to evaluate M55 rockets for chemical agent liquid leaks prior to processing in the VRCMs.

These proposed changes are being submitted as a Class 2 modification requiring approval consistent with 40 CFR § 270.42(d)(2)(ii). The changes do not alter the capability of the facility to protect human health and the environment.

2.0 PERMIT MODIFICATION REQUEST

2.1 Class of Permit Modification

The proposed changes are being submitted as a Class 2 permit modification based on the criteria in 40 CFR §270.42(d)(2)(ii), modifications that apply to changes that are necessary to enable a permittee to respond, in a timely manner, to (A) common variations in the types and quantities of the wastes managed under the facility permit, and (B) technological advancements. Justification for why the changes are needed for management of rockets in the Main Plant is provided in Section 2.3.

2.2 Description and Justification for Permit Modification

2.2.1 Substitution of VRCMs for RCMs

The M55 rocket consists of the warhead and the rocket motor (RM) contained in a shipping and firing tube (SFT). The BGCAPP Main Plant will separate the top SFT segment from the warhead and then separate the warhead from the RM, with the remaining section of the SFT remaining in place around the RMs. This separation was to have occurred in the unit operation known as the Rocket Handling System (RHS) using two Rocket Cutting Machines (RCMs). However, during inspection of rockets in storage at Blue Grass Chemical Activity (BGCA), many rockets were observed to exhibit signs of being warped as a result of storage for 60+ years. There are concerns that the process of rotating a warped SFT/rocket assembly in the existing RCMs could be problematic, resulting in incomplete cuts or RCM binding. Consequently, the RCMs will be replaced by four VRCM units.

The VRCM units will use the existing Unpack Area (UPA) input conveyors where the rockets are manually loaded onto the input conveyors and moved through the blast gates into the respective Explosive Containment Vestibule (ECV) rooms. In the ECV, a new section of conveyor will move the rocket to a "pick location" along the existing material path. A robot will then pick and place the entire M55 Rocket Assembly within its SFT into one of the VRCMs (in the upright/vertical orientation) of that rocket line. There will be two VRCM units on each rocket line; only one VRCM per rocket line will be used at a time, with the other VRCM in standby. Once placed in the VRCM unit, the top portion (warhead end) of the SFT will be held with the robot pneumatic gripper and the lower side held with the lower clamping device. These two SFT "clamp locations" are located near each other to minimize the amount of potential SFT warpage at the cut location.

Once the rocket in its SFT has been loaded and is securely held by the clamps, the cutter assembly will engage and begin rotating around the SFT while the cutter wheel and back rollers are pneumatically driven inward to the 'start cut position'. The Cutter Assembly will rotate around the static SFT and index the cutting blade into the material. The robot will raise the SFT following the cut operation at which time the VRCM sequence will pause to allow inspection of warhead prior to proceeding with next step. If acceptable, the top half of the SFT will then be removed and placed on the VRCM output conveyor and moved to the Motor Packing Room (MPR).

With the warhead exposed after removal of its SFT segment, the VRCM will lower the SFT while a Laser Height Gauge is directed at the warhead. Once the warhead is lowered below the active laser beam so that the beam is "broken", the lowering process will stop, and the lower clamp will fully engage. The robot will then grip the exposed warhead with the pneumatic gripper and the rotating cutoff tool will separate the warhead from the rocket motor. The operator uses a local closed-circuit television (CCTV) to verify that liquid is or is not present. Upon verification that liquid is not present, the operator directs the robot to remove the warhead and place it on the VRCM output conveyor where it will be conveyed to the Explosive Containment Room (ECR) for subsequent management in the Rocket Warhead Containerization System (RWCS). Separated RMs in the remaining section of the SFT will be placed on the VRCM output conveyor and moved to the MPR.

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1 The VRCM has been designed with a removable containment bucket for the purposes of
2 capturing / containing any liquid that may run out of the rocket during a cut operation. The liquid
3 holding capacity of the vessel will be at least 1.2 gallons, which is the nominal agent volume
4 within the warhead.

5 In the event of a "Process Reject" (e.g. liquid leaker or inability to process the munition) a Single
6 Round Container (SRC) will be used to overpack the warhead / motor. The contaminated
7 warhead and rocket motor will be robotically placed on a M55 Reject Rack and then directly
8 inserted into a pre-staged SRC (with a pre-staged Upper Half SFT inserted). A Single Reject
9 Rack will be used to containerize a contaminated SFT that has been removed from a warhead.

10 The total capacity of each rocket line will be a maximum of 48 rockets per hour.

11 Illustrations showing the VRCMs are attached, as are mark-ups of permit drawings to be
12 updated.

13 Substitution of the four VCRMs, which are specifically designed to process warped rockets, will
14 mitigate processing issues that could have been encountered with the RCMs, and is consistent
15 with a Class 2 permit modification per the criteria of 40 CFR §270.42(d)(2)(ii).

16 **2.2.2 Addition of RNDE for M55 Rockets**

17 Prior to processing in the VRCMS, the M55 rockets will optionally undergo an x-ray screening to
18 detect the presence of liquid chemical agent. This Non-Destructive Examination technology will
19 consist of a stand-alone unit installed in Unpack Area 1 of the MDB. The RNDE system will be
20 used on the first batches of chemical agent rockets that are processed to determine whether
21 liquid agent is present. Continuation of RNDE monitoring will be based on the initial leak rates
22 that are found or lots with the potential to be problematic.

23 The RNDE System will contain two independent RNDE work cells (Cell #1 & #2) enclosed by
24 perimeter safety stand-off guards to provide radiation protection to the RDNE operator and to
25 allow observation of the operation. Note that the X-ray compartment will contain sufficient
26 radiation shielding to isolate the X-ray energy within the designated radiation safety boundary.
27 A Hazards of Electromagnetic Radiation to Ordnance (HERO) review has determined that the
28 RNDE equipment or power source present no risk to the M55 rocket's M62 ignition assembly or
29 M417 point detonating (PD) fuze.

30 The two cells in the RNDE will be identical in layout and function and operated independently.
31 Operators in the UPA will unload pallets of rockets from the EONCs and deliver them to the
32 RNDE Unloading Table. The operators will load five rockets from the pallet onto a waiting input
33 cart. Once the five rockets are loaded, the cart will be moved to the RNDE and inserted into an
34 available cell (Cell #1 or Cell #2) slot where it is locked in place. The RNDE process will start
35 with a robot "picking" a rocket to be inspected from the input cart and placing it into a cradle in
36 the Motion Sled. A pneumatic pusher will push the rocket into place within the Motion Sled, and
37 the Motion Sled will convey the rocket across the X-ray Scanner.

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1 The X-ray scan will begin at the nose end, moving along the body of the warhead, and stopping
2 at the RM segment; that is, the X-ray Scanner will remain stationary while the rocket is slowly
3 moved through the X-ray machine via the Motion Sled. The Motion Sled is also designed to also
4 allow for an optional 0-10° tilt at the discretion of the operator to potentially improve liquid
5 detection due to pooling at a low point. Results from the scan will appear on the X-Ray Monitor
6 which will provide sufficient detail and imagery to allow a trained operator to detect the presence
7 (or absence) of liquid agent within the M55 rocket/SFT assembly and within the interstitial
8 spaces between the warhead and RM. Based on the scan, the operator will input PASS,
9 RESCAN, or FAIL into the RNDE interface.

10 If the rocket receives a "PASS" from the operator, indicating the absence of liquid agent, a robot
11 will "pick" it from the X-ray compartment and place it on the waiting output transport cart (locked
12 in place in the outlet of the cell). If the rocket receives "RESCAN" input from the operator, the
13 Motion Sled will tilt 3-10° and remain in that position to allow for any liquid to pool at the lower
14 section, and then the rocket re-scanned and evaluated again by the operator. RESCAN can be
15 repeated multiple times until the operator is confident of their assessment. If the scanned rocket
16 receives a "FAIL" input from the operator, indicating the presence of liquid, a robot will "pick" that
17 rocket from the X-ray compartment and return it back to the input transport cart.

18 Once all five rockets have been scanned and dispositioned, the input cart, empty or containing
19 "FAILED" rockets, and the output cart, containing "PASSED" rockets, will be released from the
20 RNDE cell. The output cart will be taken to one of the rocket feed lines for processing in the
21 RWCS System. If the input cart contains any "FAILED" rockets, then the UPA operators will
22 overpack the rockets in SRCs and placed in compliant storage pending transport by flat bed
23 truck back to BGCA for storage until treatment at the Static Detonation Chamber (SDC) 2000 is
24 available.

25 The cycle time for the RNDE system will be approximately 24 rockets per hour.

26 Illustrations showing the RNDE operation are attached, as are mark-ups of permit drawings to
27 be updated.

28 Addition of the RNDE system will allow identification of liquid leakers that potentially do not
29 result in elevated MINICAMS monitoring results due to liquid agent entrapment within the
30 interspatial areas of the SFTs and the M55 rocket assembly. Consequently, the used of this
31 advanced monitoring technique will be more protective of human health and the environment
32 and is consistent with a Class 2 permit modification per the criteria of 40 CFR §270.42(d)(2)(ii).

33 **3.0 SUPPORTING INFORMATION AND DESCRIPTION OF** 34 **REQUESTED PERMIT CHANGES**

35 **3.1 Part A Update**

36 The two RCMs miscellaneous units listed in the Main Plant Part A forms are replaced with the
37 four VRCM miscellaneous units. The RNDE is added as a miscellaneous unit.

1 **3.2 Other Required Updates**

2 Updated professional engineer (PE) stamped as-built piping and instrumentation drawings
3 (P&IDs) and process flow diagrams (PFDs) will be provided separately when these are
4 completed. As indicated in Appendix A, no other permit document changes are required.

5 **3.3 Requested Permit Modifications**

6 The following permit modifications are requested. Additions are shown in red and deletions
7 shown by strikeout. Note full permit tables are not provided, only requested additions or
8 deletions.

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A.III.X.(4) Permitted Miscellaneous Units

Condition No.	Permitted Miscellaneous Unit	Designation	Amount and types of waste	Secondary containment	Conditions
A.III.X.(4)(c)	Rocket Cutting Machines (RCM)	MX-RHS-0113; MX-RHS-0114	Approximately 51,700 rockets containing 10.7 pounds of GB.	Coated concrete floor with curb and sump.	Two rocket cutting machines are permitted for separating rocket motors from rocket warheads. The permitted capacity is 40 warheads per hour each line or 2400 pounds per hour each line.
A.III.X.(4)(c)	Vertical Rocket Cutting Machines (VRCMs)	MJ-VRCM-0106 MJ-VRCM-0107 MJ-VRCM-0126 MJ-VRCM-0127	Approximately 51,700 rockets containing approximately 10.7 pounds of GB; approximately 17,700 rockets containing approximately 10.1 pounds of VX	Coated concrete floor with curb and sump.	Four vertical rocket cutting machines (two each per rocket line) are permitted for separating rocket motors from rocket warheads. The permitted capacity is up to 48 warheads per hour each line or 2,880 pounds per hour each line.
A.III.X.(4)(i)	RNDE System	MJ-RNDE-0101	Nominal 24 Rockets per hour	Coated concrete floor with curb and sump.	This unit is located in Unpack Area 1 and optionally used for examination of rockets for liquid chemical agent in the interspaces between the SFT and the rocket.

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APPENDIX C-1: MAIN PLANT RCRA SUBPART CC EXEMPTED OR EXCLUDED UNITS

Unit Identification	Unit Type	Design Capacity	Subpart CC Exclusion or Exemption
RNDE System	Containers	<0.1 m ³	Not applicable per 40 CFR 264.1080(b)(2); Excluded due to capacity

APPENDIX C-2. MAIN PLANT UNITS SUBJECT TO SUBPART CC

Rocket Cutting Machines (RCM): ● MX-RHS-0113 ● MX-RHS-0114	Subpart X Miscellaneous Unit	Forty (40) M55 Rockets per hour	40 CFR 264.1084 (per 40 CFR 264.601)
Vertical Rocket Cutting Machines (VRCMs) ● MJ-VRCM-0106 ● MJ-VRCM-0107 ● MJ-VRCM-0126 ● MJ-VRCM-0127	Subpart X Miscellaneous Unit	Forty-Eight (48) M55 Rockets per hour	40 CFR 264.1084 (per 40 CFR 264.601)

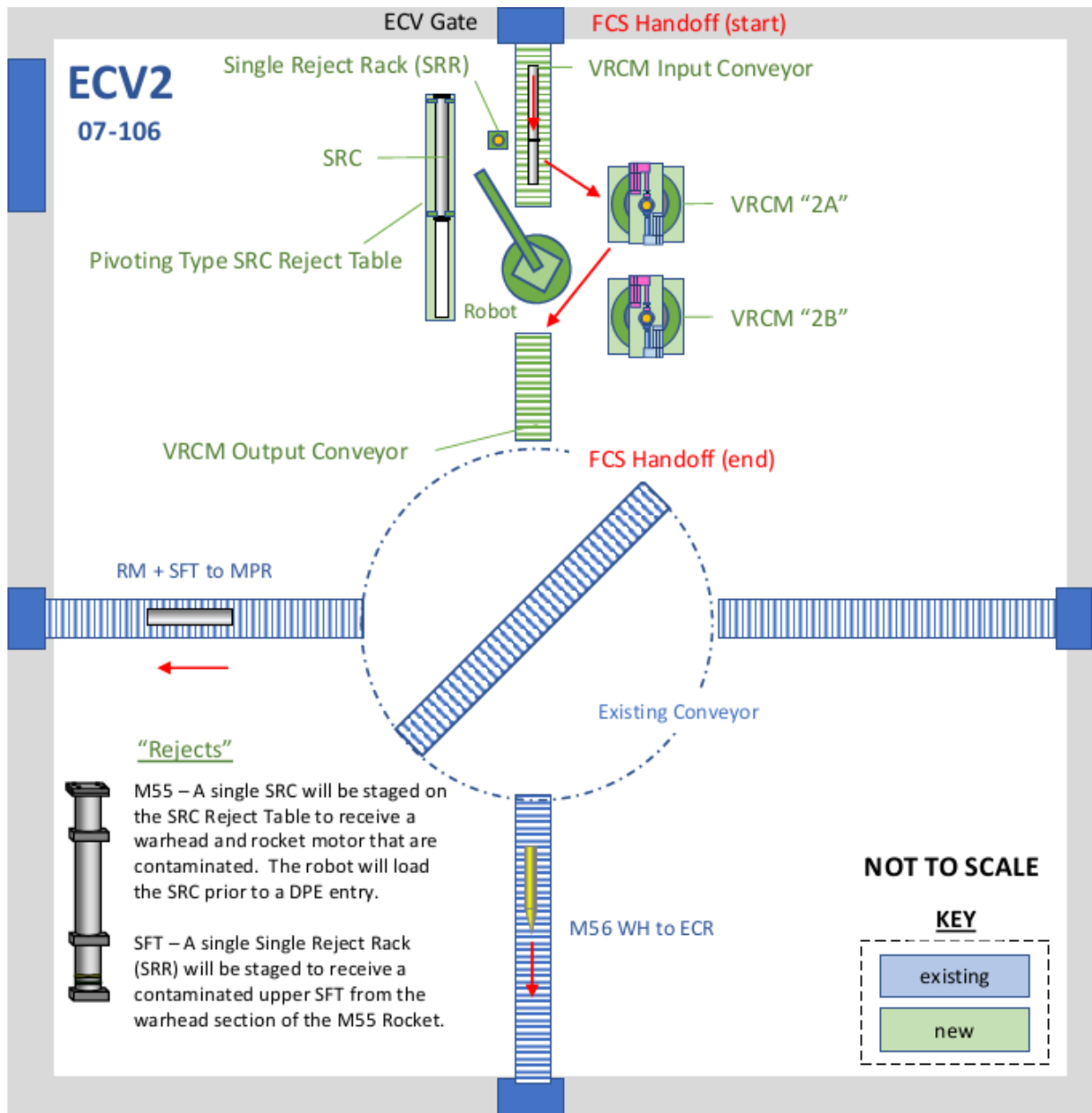
APPENDIX F. CRITICAL RCRA PARAMETERS

Item	System	Parameter Description	Instrument Tag	Units	Critical Point	Setpoint
62	RCM	GB Rocket Throughput of MX-RHS-0113/0114	Known Rocket Weight / Rocket Counter	lb/hr	2400 (Maximum of 40 Rockets per Hour)	≤2400
62	VRCM	Rocket Throughput	Known Rocket Weight / Rocket Counter	lb/hr	2,880 (Maximum of 48 Rockets per Hour Each)	≤2,880

APPENDIX G. MAIN PLANT INTERLOCKS

System	Interlock Activation	Interlock Action
RCM	Shear blade cooling spray system low flow HH current for chuck motor SFT separation motor over torque	Shear blade does not cut if inadequate flow detected Stop on high current Stop on over torque and open SFT gripper

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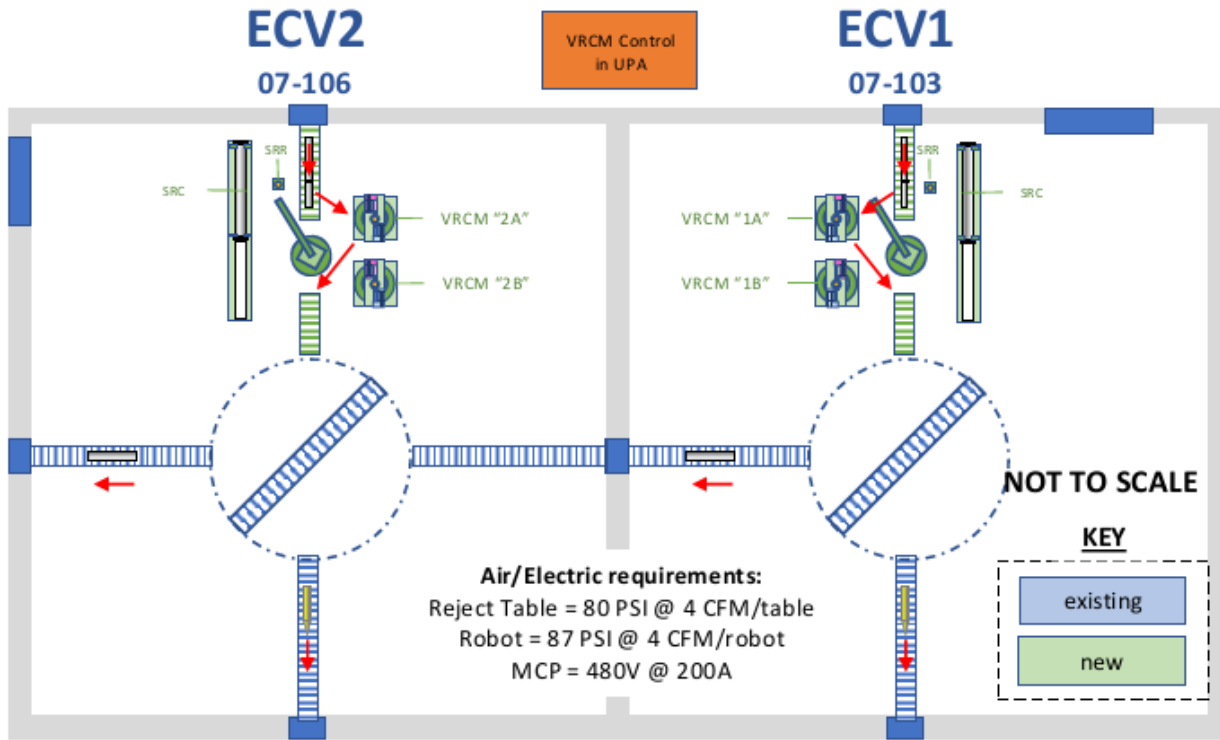


ECV1 layout will be identical and mirrored

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Figure 1. VRCM Layout Illustration (One Rocket Line).

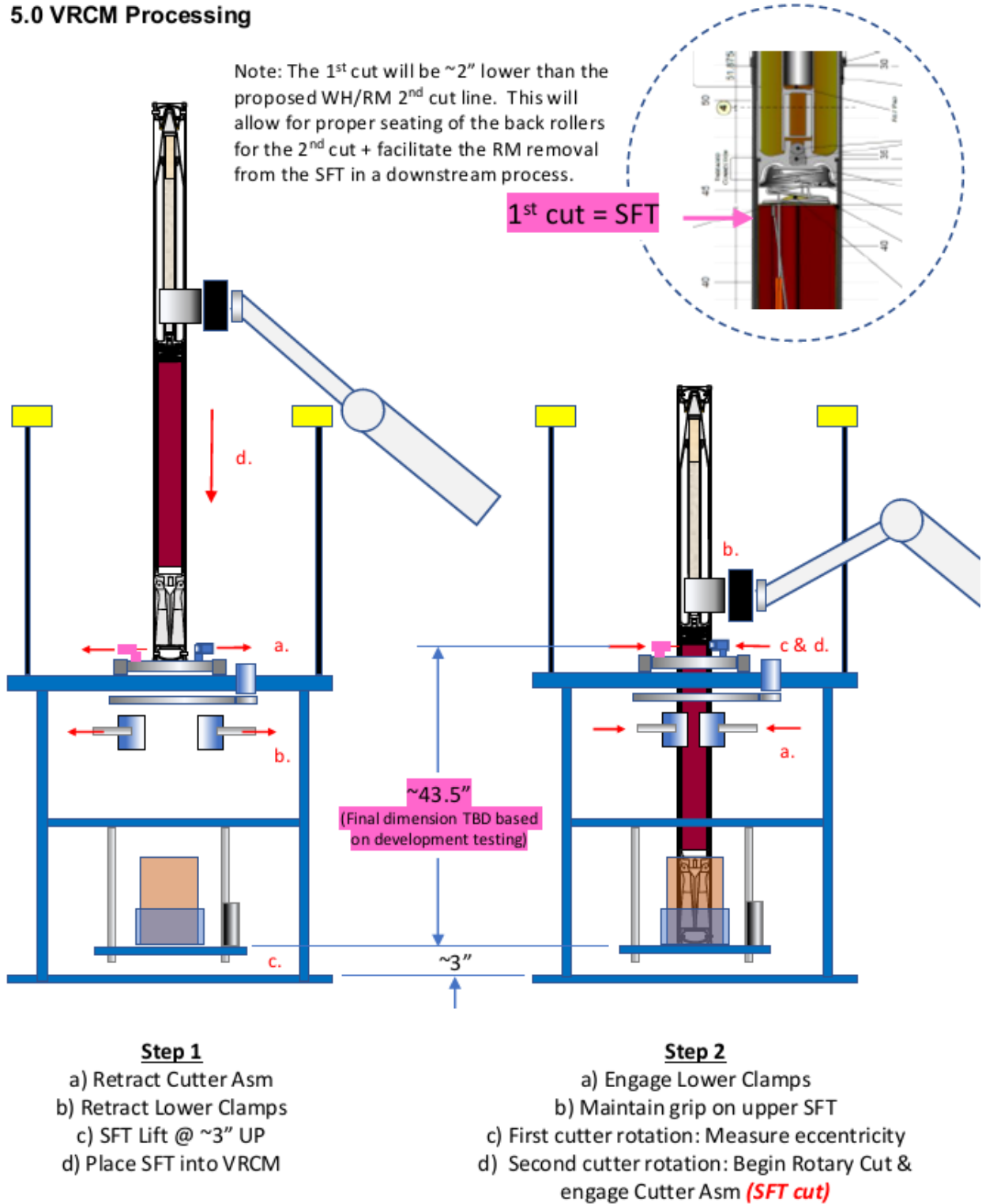
- Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Vertical Rocket Cutting Machines and Rocket Non Destructive Examination



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Figure 2. VRCM Layout Illustration (Both Rocket Lines).

5.0 VRCM Processing

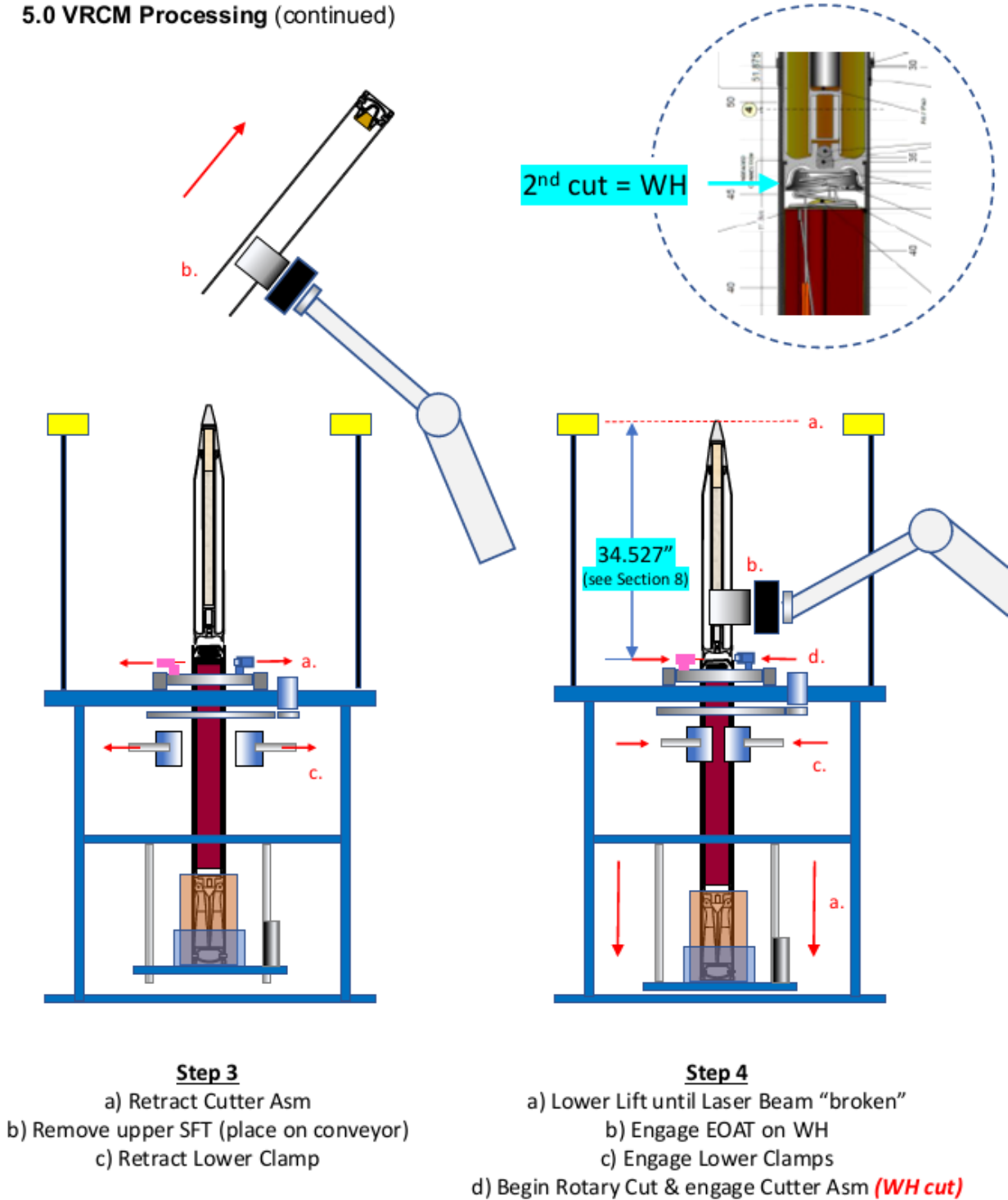


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Figure 3. VRCM Operation Illustration (Rocket Placement and SFT Cut).

5.0 VRCM Processing (continued)

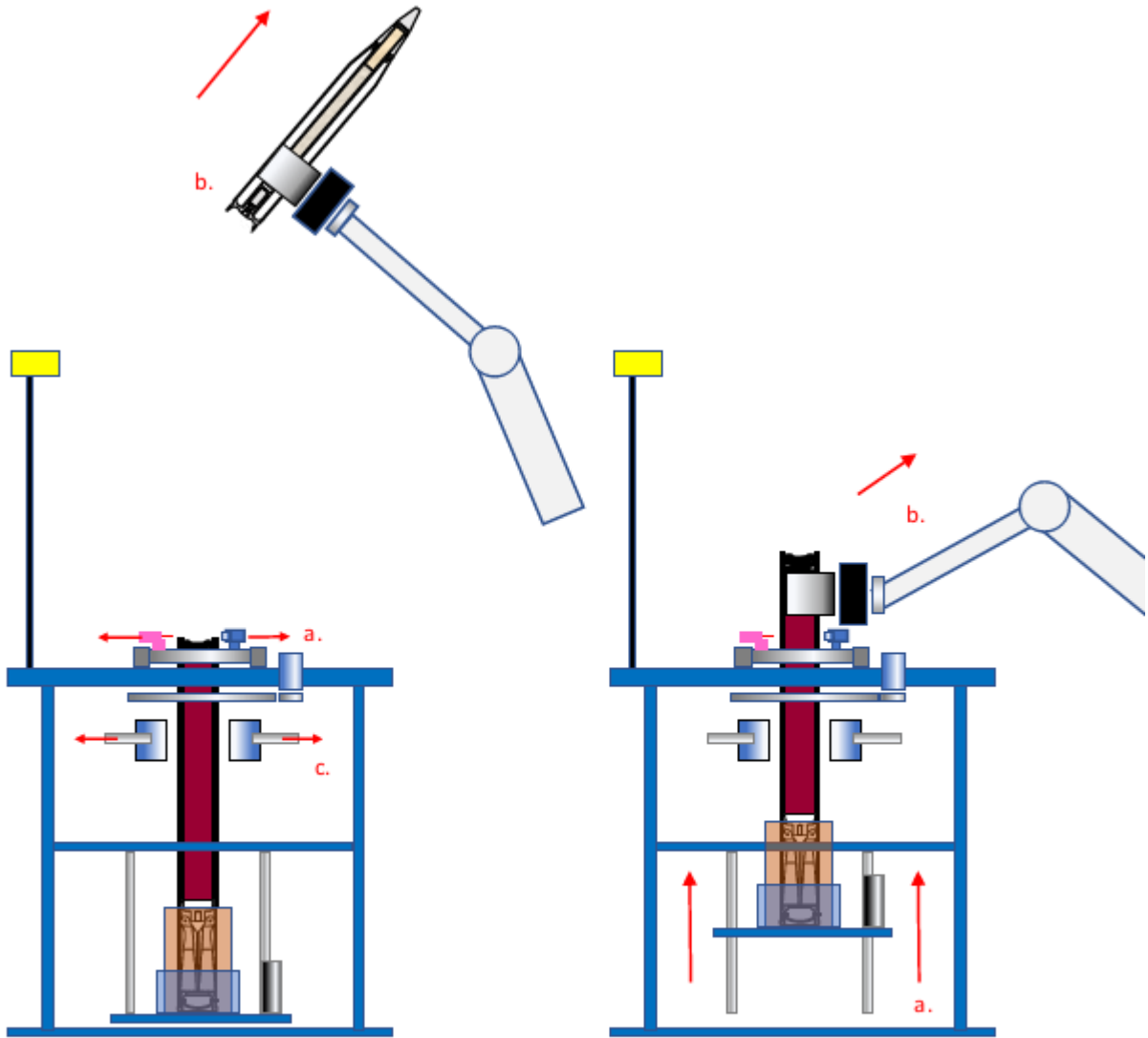


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Figure 4. VRCM Operation Illustration (SFT Segment Removal and Warhead Cut).

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1



Step 5

- a) Retract Cutter Asm
- b) Remove WH (place on conveyor)
- c) Retract Lower Clamp

Step 6

- a) Raise lower SFT up ~12"
- b) Remove lower SFT/RM (place on conveyor)

2

3

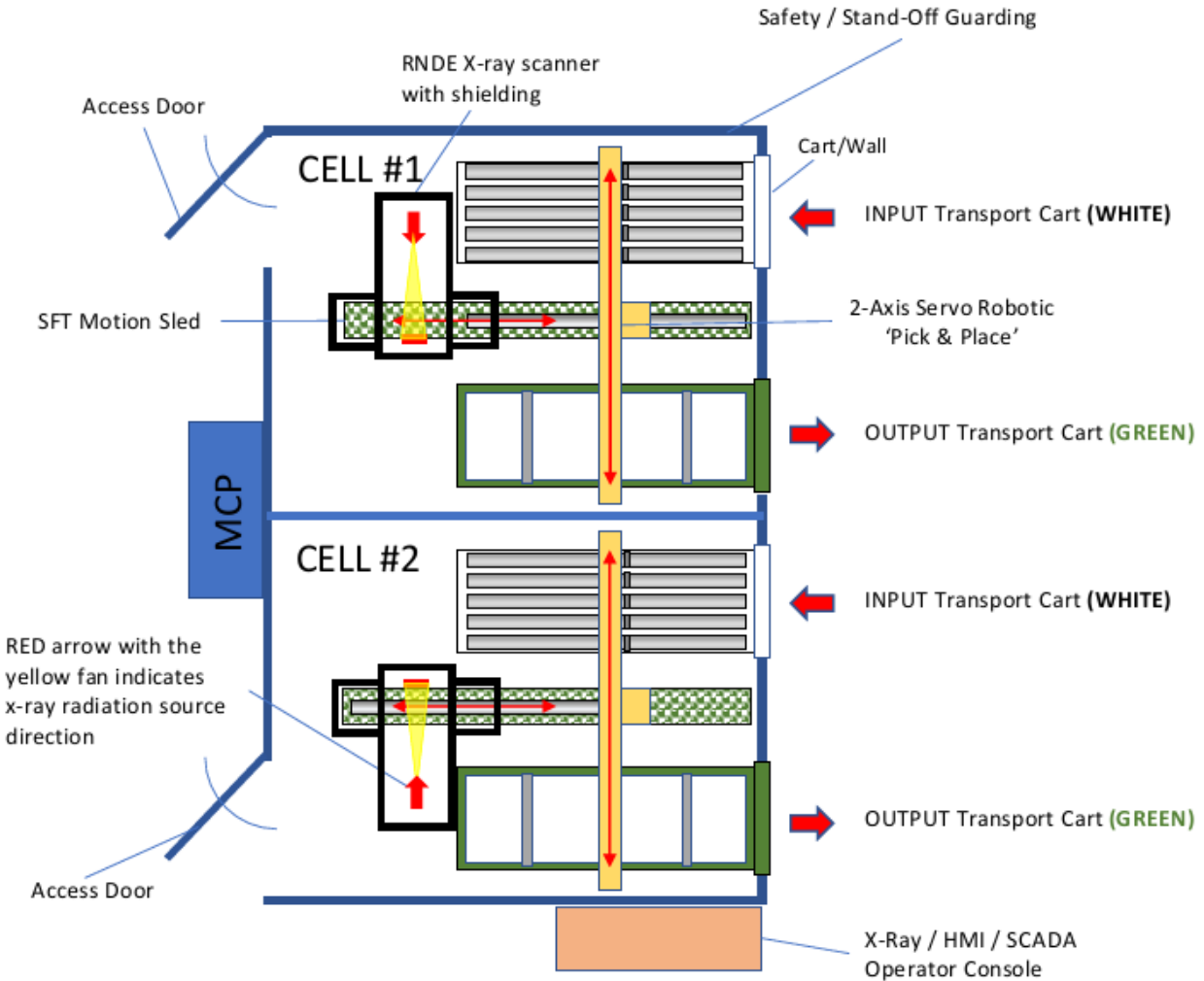
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Figure 5. VRCM Operation Illustration (Warhead and Rocket Motor Removal).

5

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RNDE "System" Enclosure (2 cells)
(TOP VIEW)



NOTES:

Safety Guarding (wall) provides stand-off barrier to support Time, Distance, and Shielding to the RNDE Operator and to Munition Handlers within the UPA.

The Safety Guarding material (clear plexiglass) allows for the UPA Operators to observe the operation directly and for CROs and Treaty Inspector to observe the operation via CCTV cameras.

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Figure 6. RNDE Operation Illustration.

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Appendix A Permit Related Information or Documents Affected by PMR

Regulatory Citation(s) 401 KAR 39 (incorporating 40 CFR Part 264 where applicable)	Description of Requirement	Modified or Clarified Information		
		Yes	No	Sections of the Part B Permit Modified or Supplemental Information Required
39:090 Sec. 1 (264 Subpart B)	General Facility Standards			
39:090 Sec. 1 (§264.11)	Identification number		✓	No change
39:090 Sec. 1 (§264.12)	Required notices		✓	No Change
39:090 Sec. 1 (§264.13)	General waste analysis		✓	No change
39:090 Sec. 1 (§264.14)	Security		✓	No change
39:090 Sec. 1 (§264.15)	General inspection requirements		✓	No change
39:090 Sec. 1 (§264.16)	Personnel training		✓	No change
39:090 Sec. 1 (§264.17)	General requirements for ignitable, reactive, or incompatible wastes		✓	No change
39:090 Sec. 1	Location standards Geological Information		✓	No change
39:090 Sec. 1 (§264.19)	Construction quality assurance program		✓	No change
39:090 Sec. 1 (264 Subpart C)	Preparedness and Prevention			
39:090 Sec. 1 (§264.31)	Design and operation of facility		✓	No change
39:090 Sec. 1 (§264.32)	Required equipment		✓	No change
39:090 Sec. 1 (§264.33)	Testing and maintenance of equipment		✓	No change
39:090 Sec. 1 (§264.34)	Access to communication or alarm system		✓	No change
39:090 Sec. 1 (§264.35)	Required aisle space		✓	No change
39:090 Sec. 1 (§264.37)	Arrangements with local authorities		✓	No change
39:090 Sec. 1 (264 Subpart D)	Contingency Plan and Emergency Procedures			
39:090 Sec. 1 (§264.51)	Purpose and implementation of contingency plan		✓	No change
39:090 Sec. 1 (§264.52)	Content of contingency plan		✓	No Change
39:090 Sec. 1 (§264.53)	Copies of contingency plan		✓	No change
39:090 Sec. 1 (§264.54)	Amendment of contingency plan		✓	No change
39:090 Sec. 1 (§264.55)	Emergency coordinator		✓	No change
39:090 Sec. 1 (§264.56)	Emergency procedures		✓	No change
39:090 Sec. 1 (264 Subpart E)	Manifest System, Recordkeeping, and Reporting			
39:090 Sec. 1 (§264.71)	Use of the manifest system		✓	No change
39:090 Sec. 1 (§264.72)	Manifest discrepancies		✓	No change
39:090 Sec. 1 (§264.73)	Operating record		✓	No change

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Regulatory Citation(s) 401 KAR 39 (incorporating 40 CFR Part 264 where applicable)	Description of Requirement	Modified or Clarified Information		
		Yes	No	Sections of the Part B Permit Modified or Supplemental Information Required
39:090 Sec. 1 (§264.74)	Availability, retention, and disposition of records		✓	No change
39:090 Sec. 1	Annual report		✓	No change
39:090 Sec. 1 (§264.76)	Unmanifested waste report		✓	No change
39:090 Sec. 1	Additional reports		✓	No change
39:090 Sec. 1 (264 Subpart F)	Releases from Solid Waste Management Units			
39:090 Sec. 1 (§264.91)	Required programs		✓	No change
39:090 Sec. 1 (§264.92)	Ground-water protection standard		✓	No change
39:090 Sec. 1 (§264.93)	Hazardous constituents		✓	No change
39:090 Sec. 1	Concentration limits		✓	No change
39:090 Sec. 1 (§264.95)	Point of compliance		✓	No change
39:090 Sec. 1 (§264.96)	Compliance period		✓	No change
39:090 Sec. 1 and §264.97	General ground-water monitoring requirements		✓	No change
39:090 Sec. 1 (§264.98)	Detection monitoring program		✓	No change
39:090 Sec. 1 (§264.99)	Compliance monitoring program		✓	No change
39:090 Sec. 1 (§264.100)	Corrective action program		✓	No change
39:090 Sec. 1	Releases from solid waste management units - corrective action for solid waste management units		✓	No change
39:090 Sec. 1	Incorporation by reference - groundwater analysis and report forms		✓	No change
39:090 Sec. 1 (264 Subpart G)	Closure and Post-Closure			
39:090 Sec. 1 (§264.111)	Closure performance standard		✓	No change
39:090 Sec. 1 and §264.112	Written plan, content of plan, amendment of plan, notification of partial closure and final closure, removal of wastes and decontamination or dismantling of equipment		✓	No change
39:090 Sec. 1 and §264.113	Time allowed for closure		✓	No change
39:090 Sec. 1 (§264.114)	Disposal or decontamination of equipment, structures, and soils		✓	No change
39:090 Sec. 1 (§264.115)	Certification of closure		✓	No change
39:090 Sec. 1 (§264.116)	Survey plat		✓	No change
39:090 Sec. 1 and §264.117	Post-closure care and use of property		✓	No change
39:090 Sec. 1 and §264.118	Post-closure plan and amendment of plan		✓	No change
39:090 Sec. 1 (§264.119)	Post-closure notices		✓	No change

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Regulatory Citation(s) 401 KAR 39 (incorporating 40 CFR Part 264 where applicable)	Description of Requirement	Modified or Clarified Information		
		Yes	No	Sections of the Part B Permit Modified or Supplemental Information Required
39:090 Sec. 1 (§264.120)	Certification of completion of post-closure care		✓	No change
39:090 Sec. 1 (264 Subpart H)	Financial Requirements		✓	No applicable
39:090 Sec. 1 (264 Subpart I)	Use and Management of Containers			
39:090 Sec. 1 (§264.171)	Condition of containers		✓	No change
39:090 Sec. 1 (§264.172)	Compatibility of waste with containers		✓	No change
39:090 Sec. 1 (§264.173)	Management of containers		✓	No change
39:090 Sec. 1 (§264.174)	Inspections		✓	No change
39:090 Sec. 1 (§264.175)	Containment		✓	No change
39:090 Sec. 1 (§264.176)	Special requirements for ignitable or reactive waste		✓	No change
39:090 Sec. 1 (§264.177)	Special requirements for incompatible wastes		✓	No change
39:090 Sec. 1 (§264.178)	Closure		✓	No change
39:090 Sec. 1 (§264.179)	Air emission standards		✓	No change
39:090 Sec. 1 (264 Subpart J)	Tank Systems			
39:090 Sec. 1 (§264.191)	Assessment of existing tank system's integrity		✓	No change
39:090 Sec. 1 (§264.192)	Design and installation of new tank systems or components		✓	No change
39:090 Sec. 1 (§264.193)	Containment and detection of releases		✓	No change
39:090 Sec. 1 (§264.194)	General operating requirements		✓	No change
39:090 Sec. 1 (§264.195)	Inspections		✓	No change
39:090 Sec. 1 (§264.196)	Response to leaks or spills and disposition of leaking or unfit-for-use tank systems		✓	No change
39:090 Sec. 1 (§264.197)	Closure and post-closure care		✓	No change
39:090 Sec. 1 (§264.198)	Special requirements for ignitable or reactive wastes		✓	No change
39:090 Sec. 1 (§264.199)	Special requirements for incompatible wastes		✓	No change
39:090 Sec. 1 (§264.200)	Air emissions standards		✓	No change
39:090 Sec. 1	Effective dates		✓	No change
39:090 Sec. 1 (264 Subpart X)	Miscellaneous Units			
39:090 Sec. 1 (§264.601)	Environmental performance standards	✓		Described in Section 2 of this PMR
39:090 Sec. 1 (§264.602)	Monitoring, analysis, inspection, response, reporting, and corrective action		✓	No change
39:090 Sec. 1 (§264.603)	Post-closure care		✓	No change
39:090 Sec. 6	Treatment of Nerve and Blister Agents		✓	No change

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Regulatory Citation(s) 401 KAR 39 (incorporating 40 CFR Part 264 where applicable)	Description of Requirement	Modified or Clarified Information		
		Yes	No	Sections of the Part B Permit Modified or Supplemental Information Required
Appendices				
39:090 Sec. 1 (264 Appendix I)	Recordkeeping instructions		✓	No change
39:090 Sec. 1 (264 Appendix IV)	Cochran's approximation to the Behrens-Fisher Students' T-Test		✓	No change
39:090 Sec. 1 (264 Appendix V)	Examples of potentially incompatible waste		✓	No change
39:090 Sec. 1 (264 Appendix IX)	List of hazardous constituents for groundwater monitoring		✓	No change

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Regulatory Citation(s) 401 KAR 39 (incorporating 40 CFR Part 270 where applicable)	Description of Requirement	Modified or Clarified Information		
		Yes	No	Sections of the Part B Permit Modified or Supplemental Information Required
39:060 Sec. 5 (270 Subpart A)	General Information			
39:060 Sec. 5	Considerations under Federal law		✓	No change
39:060 Sec. 5 (§270.4)	Effect of a permit		✓	No change
39:060 Sec. 5	Prohibition of use of unpermitted facility		✓	No change
39:060 Sec. 5 (§270.5)	Noncompliance and program reporting by the cabinet		✓	No change
39:060 Sec. 5 (270 Subpart C)	Permit Conditions			
39:060 Sec. 5 and §270.30	Conditions applicable to all permits		✓	No change
39:060 Sec. 5 (§270.31)	Requirements for recording and reporting of monitoring results		✓	No change
39:060 Sec. 5 and §270.32	Establishing permit conditions	✓		Requested modifications provided in Section 3 of this PMR
39:060 Sec. 5 (§270.33)	Schedules of compliance		✓	No change
39:060 Sec. 5	Contents of Part A of the Permit Application (Form 7058A)	✓		Updated Part A included with this PMR
39:060 Sec. 5	General Contents of Part B Application			
39:060 Sec. 5 (§270.14(a))	Contents of Part B: General requirements Certified documents	✓		Updated permit drawings to be provided as-built; mark-ups included with this PMR
39:060 Sec. 5 and §270.14	General information requirements General description Topographic map Seismic considerations Subsurface geology and Karst features Groundwater monitoring Floodplain requirements Traffic information Alternative analysis plan Past compliance record Financial responsibility to construct and operate		✓	No change
39:060 Sec. 5 (§270.14(b) (11))	Location information		✓	No change
39:060 Sec. 5 (§270.14(c))	Additional groundwater protection information requirements		✓	No change
39:060 Sec. 5 (§270.14(d))	Information requirements for solid waste management units		✓	No change
39:060 Sec. 5 (§270.15)	Specific Part B information requirements for containers		✓	No change
39:060 Sec. 5 (§270.16)	Specific Part B information requirements for tanks Number, location, and types of tanks		✓	No change

- Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Vertical Rocket Cutting Machines and Rocket Non Destructive Examination

	<p>Tank dimensions and capacity</p> <p>Procedures for handling incompatible, ignitable, or reactive wastes</p> <p>Material of construction, volume, dimensions and all design details</p> <p>Type of waste contained in tanks</p> <p>Operating pressure and temperature</p> <p>Description of the feed systems, safety cutoff, bypasses systems, and pressure controls</p> <p>Diagrams of piping, instrumentation and process flow for each tank system</p>			
39:060 Sec. 5 (§270.23)	<p>Specific part B information requirements for miscellaneous units.</p> <p>Description</p> <p>Treatment unit design/construction details</p> <p>Site assessments</p> <p>Potential exposure pathways</p> <p>Effectiveness of treatment</p>	✓		Provided in Sections 2 and 3 of this PMR

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REVISED PART A AND DRAWINGS MARKUPS