

Fact Sheet
Blue Grass Army Depot (BGAD)
EPA ID #KY8-213-820-105, AI #2805
Class 2 Hazardous Waste Storage & Treatment Permit Modification Request,
Open Burning/Open Detonation and Controlled Destruction Chamber

Blue Grass Army Depot (BGAD) has submitted a request to the Kentucky Department for Environmental Protection (KDEP), Division of Waste Management for modifying its Hazardous Waste Facility Permit issued pursuant to Resource, Conservation, and Recovery Act (RCRA), Subpart X regulations for the Open Burn/Open Detonation (OB/OD) and Controlled Destruction Chamber (CDC) operations.

BGAD is requesting modifications to the permit to reflect changes being considered for the conventional waste military munition demilitarization operations. These changes are summarized in the Table of Modifications which are intended towards operational improvements and efficiency, and will continue to be consistent with the regulatory requirements for the protection of human health and the environment.

The relevant details of the proposed permit modifications are contained in an application entitled: "RCRA Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Open Burning/Open Detonation and Controlled Detonation Chamber", June 2021. The application is available for download and public review through the BGAD Facebook page: www.facebook.com/Bluegrassarmydepot/

I. Facility Description and Contact Information

BGAD is a 14,596-acre facility operated by the United States Army and is located in Madison County, Kentucky. The depot was established in April 1942 during World War II by the War Department as an ordnance supply depot. The facility address is 431 Battlefield Memorial Highway, Richmond, Kentucky and the point of contact (POC) is Mr. Mark Henry, Public Affairs Officer at (859) 779-6941 / mark.d.henry.civ@mail.mil. The regulatory official POC is Mr. Brandon May, Hazardous Waste Branch, Division of Waste Management, KDEP at (502) 782-7010 / brandon.may@ky.gov and the address is 300 Sower Boulevard, Frankfort, KY 40601.

II. The Permitting Process

The permitting process is governed by the requirements of the federal RCRA and Commonwealth of Kentucky statutes and regulations. The proposed changes to the OB/OD and CDC permit sections are being submitted as Class 2 modifications requiring approval and Class 1 modifications for which BGAD elects to follow the Class 2 procedures consistent with 40 Code of Federal Regulations (CFR) 270.42(b)(1) and 40 CFR 270.42(a)(3).

The permitting process gives an opportunity for the public to review and provide comments to the requested Class 2 modification permit application. The information on the public comment period is announced through a public notice mailed electronically to appropriate agencies and individuals on the facility mailing list, as well as published in

the three local area newspapers: Richmond Register, Berea Citizen, and Lexington Herald-Leader.

III. Public Notice, Comment Period, and Public Meeting

The public notice announces the opening of a sixty (60) day public comment period in which any interested person is encouraged to submit comments on the proposed draft permit. This public comment period opens June 13, 2021 and will close by midnight on August 12, 2021.

A public meeting has been scheduled for Tuesday, July 20, 2021. Due to the Covid-19 pandemic, the public meeting will be conducted virtually and hosted by BGAD. Further details on the virtual public meeting and participation will be provided via the BGAD Facebook page.

Interested persons are encouraged to send comments via e-mail or US Postal Service to Mr. Mark Henry using the facility contact information provided above. Alternatively, you may also send comments to the KDEP POC, Mr. Brandon May. All comments must be sent by the closing date of August 12, 2021.

After review and consideration of all written comments received by the closing date, the Director of the Division of Waste Management will make a final decision regarding the permit modification request and issuance of the revised permit.

Table of Modifications RCRA Class 2 Hazardous Waste Storage & Treatment Permit Modification Request Open Burning/Open Detonation and Controlled Destruction Chamber Operations			
Application Sections	Modification Description	Regulatory Reference under 40 CFR 270.42 Modification Class	RCRA Permit Section Reference
2.2.1 / 3.1	Remove wind speed and direction restrictions applied to OB to reflect conditions consistent with assumptions applied to air modeling and risk assessment.	Class 1 for which BGAD elects to follow Class 2 procedures. 40 CFR 270.42, Appendix I A.8, a change to remove permit conditions that are no longer applicable (i.e., because the standards upon which they are based are no longer applicable).	OB/OD Section P.III.XA.(2)(d) Meteorological Restrictions
2.2.2 / 3.2	Authorize OD of ammunition that is .50 caliber or smaller when these ammunitions are recovered/found within BGAD boundaries during routine inspections and operations and deemed unsuitable for shipment.	Class 2. 40 CFR 270.42(d)(2)(ii)(A), a common variation in waste type managed.	OB/OD Sections P.III.A.(1) Permitted Waste Streams, Descriptions & Codes P.III.A.(3) Prohibited Wastes
2.2.3 / 3.3	Revise the OD unit permit boundary, annual inspection boundary, and semi-annual inspection boundary to reflect visual observations and modeling.	Class 2. By request of the Director	OB/OD Section Appendix B
2.2.4 / 3.4	Revise the OB unit semi-annual inspection boundary to reflect visual observation and operator experience.	Class 2. By request of the Director.	OB/OD Section Appendix B
2.2.5 / 3.5	Include an OB Unit Groundwater Monitoring Plan to incorporate a point of compliance monitoring network for the OB Unit.	Class 2. By request of the Director.	OB/OD Section P.III.F.(2) General Groundwater Monitoring Program

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2.2.6 / 3.6	Revise the OD Unit Groundwater Monitoring Plan to include an upgradient monitoring location and revise the statistical approach to reflect the background location.	Class 2. By request of the Director.	OB/OD Section P.III.F.(2)(a) Well Location, Installation, and Construction Hazardous Waste Facility Permit OB/OD Section P.III.F.(2)(e) Sampling and Analysis Procedures
2.2.7 / 3.7	Revise the groundwater monitoring report submittal timeline requirement from current “within 30 days of each sampling event” to “within 75 days of each sampling event” to provide for sufficient time to produce analytical results, validation and reporting.	Class 2. 40 CFR 270.42 Appendix I A.4b, a change in the frequency of or procedures for monitoring, reporting, sampling, or maintenance activities by the permittee.	OB/OD Section P.III.F.(2)(f) Recordkeeping and Reporting
2.2.8 / 3.8	Authorize the use of the OB unit and OD unit for treatment of energetic waste that is not WMM on a case-by-case basis to allow BGAD to safely respond to the need to treat energetic waste streams.	Class 2. 40 CFR 270.42 (d)(2)(ii)(A) as a change necessary to enable BGAD to respond, in a timely manner, to common variations in the types and quantities of the waste managed under the facility permit.	OB/OD Section P.III.A.(1) Permitted Waste Streams, Descriptions, and Codes

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2.2.9 / 3.9	Revise the requirement to inspect erosion control structures associated with the OD unit from “after any one inch or greater rainfall event” to “after any two inch or greater rainfall event” to reflect experience gained since permit issuance.	Class 2. 40 CFR 270.42, Appendix I B.4, a change in frequency or content of inspection schedules	OB/OD Section P.III.XB.(3) Inspections
2.2.10 / 3.10	Replace the hard-coded date (November 1, 2020) for completing the CDC stack emissions testing associating that requirement with the timeframe and compliance schedule of the Title V air permit modification.	Class 1 for which BGAD elects to follow Class 2 procedures. 40 CFR 270.42, Appendix I A.1 an administrative change.	CDC Section D.III.B.(10) Compliance Schedule
2.2.11 / 3.11	Remove restriction for storing waste military munitions (WMM) overnight at the CDC Building to allow for minimal safe handling of the WMM and improve operational efficiency.	Class 1 for which BGAD elects to follow Class 2 procedures. 40 CFR 270.42, Appendix I A.1 an administrative change.	CDC Section D.III.X.(3)(a) Waste Processing Limits