24915-00-GPE-GGPT-00399

Resource Conservation and Recovery Act (RCRA)

Agent Hydrolysate Offsite Shipment and Disposal Waste Certification

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
300 Sower Blvd.
Frankfort, Kentucky 40601

Submitted By:

Blue Grass Army Depot
431 Battlefield Memorial Highway
Richmond, Kentucky 40475-5060

and

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Richmond, Kentucky 40475

Submitted 15-MAR-2021, Revision 0
Final Page Is 5

AGENT HYDROLYSATE OFFSITE SHIPMENT WASTE CERTIFICATION

"I certify under penalty of law that this document was 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 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."

Digitally signed by: Hink, Ronald
DN: CN = Hink, Ronald C = US O = Bechtel Global Corporation
Date: 2021.03.10 13:30:16 -05'00'

Ron Hink
Project Manager
Bechtel Parsons Blue Grass
BGCAPP Operator

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

Table of Contents

Agent Hydrolysate Offsite Shipment Waste Certification 2
1.0 Overview 4
2.0 Agent Hydrolysate Waste Certification 4
3.0 Records 5
4.0 References 5

1.0 OVERVIEW

The Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) Main Plant facility is located at 431 Battlefield Memorial Highway, Richmond, Kentucky. The Bechtel Parsons Blue Grass (BPBG) Joint Venture (JV) 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 (KDEP), Division of Waste Management (DWM).

A Class 3 Permit Modification Request (PMR) for the BGCAPP Main Plant facility, Standard Document Number (SDN) 24915-00-GPE-GGPT-00394, has been submitted to KDEP in accordance with 401 Kentucky Administrative Regulation (KAR) 39:060 incorporating Title 40 Code of Federal Regulations (CFR) §270.42. The requested modifications to the permit included:

- Off-site shipment of GB agent hydrolysate for treatment and disposal.
- Off-site shipment of VX agent hydrolysate for treatment and disposal.

This document provides certification that a permitted Treatment, Storage, and Disposal Facility (TSDF) has been identified and has agreed to accept GB and VX agent hydrolysate for treatment and disposal. Included are the name, EPA ID number, location of the facility, waste acceptance criteria, treatment provided by the facility, and the final disposition of the treated waste residues.

2.0 AGENT HYDROLYSATE WASTE CERTIFICATION

BPBG JV has an executed contract with Veolia North America to treat and dispose of GB and VX agent hydrolysate from the BGCAPP Main Plant facility at the following permitted facility:

Facility Name:	Veolia ES Technical Solutions, L.L.C.
EPA ID Number:	TXD000838896
Hazardous Waste Permit No.:	50212
Location:	7665 Highway 73, Beaumont, TX 77705

Veolia will treat BGCAPP GB and VX agent hydrolysate with high-temperature incineration (INCIN). The incineration residuals, including ash, slag, and filter cake, will be sent to a Subtitle C hazardous waste landfill owned and operated by Waste Management in Carlyss, LA (EPA ID Number LAD000777201). Veolia is responsible for all waste management activities associated with incineration residual disposal.

Veolia has reviewed the signed Waste Information Profiles (WIPs) for the GB and VX agent hydrolysate from BGCAPP and determined it has the appropriate permits and treatment technology to assure safe destruction of the two waste streams. Waste acceptance criteria will consist of meeting the component ranges identified in the WIPs, based on sampling and analysis or process generation knowledge.

3.0 RECORDS

This document shall be retained in accordance with SDN 24915-000-2KP-A03-00012, *Records Retention and Turnover*.

4.0 REFERENCES

SDN 24915-000-2KP-A03-00012, *Records Retention and Turnover*

24915-00-GPE-GGPT-00394, *Class 3 Hazardous Waste Storage & Treatment Permit Modification Request, Offsite Shipment and Disposal of Agent Hydrolysate*