SUBJECT: Resource Conservation and Recovery Act (RCRA) Class 3 Hazardous Waste Permit Modification Request, Offsite Shipment and Disposal of Agent Hydrolysate
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-20542

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:

The purpose of this correspondence is to submit the attached request for a Class 3 Hazardous Waste Storage and Treatment Permit Modification to revise the treatment and disposal strategy for GB and VX agent hydrolysate to include the following:
• Off-site shipment of GB agent hydrolysate for treatment and disposal.
• Off-site shipment of VX agent hydrolysate for treatment and disposal.
• Cessation of agent hydrolysate treatment by Super Critical Water Oxidation (SCWO)
• Addition of piping and ancillary equipment to provide an alternate route for Off-gas Condensate - Metal Parts Treater (OTM) condensate tanker loading for offsite shipment.

A public notice to announce and provide information to describe this permit modification request will be scheduled to coincide with this submittal. Documentation for the notice will be provided to KDEP as required.

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 Environmental Manager, at (859) 625-6447.
SUBJECT: Resource Conservation and Recovery Act (RCRA) Class 3 Hazardous Waste Permit Modification Request, Offsite Shipment and Disposal of Agent Hydrolysate
SDN: 24915-00-TKD-GGPT-20542

“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 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,

Ron Hink
Project Manager
Bechtel Parsons Blue Grass
BGCAPP Operator

Enclosures

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