



Blue Grass Chemical Agent-Destruction Pilot Plant

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## Environmental Permitting: Resource Conservation and Recovery Act

The Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) is subject to the Resource Conservation and Recovery Act (RCRA) and was required to obtain a RCRA permit before construction of the facility could begin. RCRA ensures the safe treatment, storage and disposal of hazardous waste generated nationwide.

### What is a RCRA Permit?

A RCRA permit is a legally binding document that establishes the waste management activities that a facility may conduct and the conditions under which it may conduct them. The permit outlines facility design and operation, lays out safety standards and describes activities that the facility must perform, such as monitoring and reporting. Permits typically require facilities to develop emergency plans and train employees to handle hazards. Permits will include facility-specific requirements based on the technologies employed at BGCAPP. The permitting agency has the authority to issue or deny permits and is responsible for monitoring the facility to ensure it complies with the conditions in the permit. According to RCRA and its regulations, a treatment, storage and disposal facility (TSDF) may not operate without a permit, with a few exceptions.

Implemented by the U.S. Environmental Protection Agency (EPA) and the Kentucky Department for Environmental Protection (KDEP), RCRA regulates the management of hazardous waste from the moment it is generated until final disposal. Several aspects of RCRA affect the pilot plant, specifically the standards for generators and TSDFs. The EPA has given KDEP the authority to implement RCRA under the Kentucky Hazardous Waste Regulations, which parallel the federal RCRA regulation.

### Permitting Process

The process of obtaining a permit is long and complex, with oversight from both the EPA and KDEP. BGCAPP obtained its RCRA permit on Sept. 30, 2005. Public participation was required throughout the process.

The Blue Grass Army Depot (BGAD) commander is responsible for ensuring all environmental laws and regulations are followed for all operations occurring on the depot and is the owner and a signatory on the permit. As such, all elements related to the permit, including correspondence, applications and modifications, are coordinated with the BGAD Environmental Office.

### Treatment, Storage and Disposal Facilities (TSDF)

Facilities that treat, store or dispose of hazardous waste must first obtain a RCRA permit. RCRA requires these facilities to manage hazardous waste in a manner fully protective of human health and the environment. Since BGCAPP will treat and store hazardous waste, RCRA permits are required.

### Generators

Generators of hazardous waste must comply with standards for storage, waste tracking, labeling, record keeping and reporting. BGCAPP will generate hazardous waste as a result of operations. These wastes include spent charcoal filters, salts and used personal protective equipment.

BGAD, as the owner (applicant), and Bechtel Parsons Blue Grass as the operator (applicant), were required to submit a RCRA application to KDEP for a Research, Development and Demonstration (RD&D) permit to build and operate the full-scale pilot plant. The RD&D permit allows BGAD and Bechtel Parsons Blue Grass to build and test the pilot plant.

BGAD and Bechtel Parsons Blue Grass submitted a detailed permit application describing how BGCAPP would be built and operated to comply with RCRA regulations. Prior to submitting the permit application, the applicants held a pre-application meeting to inform the public of their intent to submit an application and to obtain comments. KDEP then reviewed the application, requested additional information and clarification as needed, developed draft permit conditions and issued a draft permit for public comment. During this comment period, both public meetings and a public hearing occurred. After comments were received and incorporated, a final RCRA RD&D permit was issued.

Although the plant consists of proven processes and components, the National Research Council recommended that the integrated plant be tested under a research and development program before full operations begin. This will help provide maximum safety to the workforce and the public. The plant will ultimately be operated under a standard RCRA permit (i.e., a "Part B permit").

With KDEP oversight, the applicants will conduct a pilot test of the proposed neutralization system. On the basis of the results, the applicants will refine the systems operating parameters and treat the remainder of the chemical weapons stockpile under a RCRA Part B permit.

### **Public Participation**

Public participation is a vital component of the permitting process. Members of the public can contribute valuable information and ideas that improve the quality of both agency decisions and permit applications. The public is encouraged to ask questions and provide input throughout the entire permitting process.