

**24915-80-GPE-GGPT-00016**

Resource Conservation and Recovery Act (RCRA)  
**Class 2 Hazardous Waste Storage & Treatment  
Permit Modification Request, Addition of VX  
Containerized Rocket Processing at the Static  
Detonation Chamber (SDC) 2000 Facility**

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  
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and

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830 Eastern Bypass, Suite 106  
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**Submitted 15 FEB 2024, Revision 0**

**Final page is 12**

## 1.0 OVERVIEW

This document contains a Class 2 Permit Modification Request (PMR) for the addition of processing containerized VX rocket warheads at the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) Static Detonation Chamber (SDC) 2000 facility. The BGCAPP SDC 2000 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).

This PMR is being submitted in accordance with 401 Kentucky Administrative Regulation 11 (KAR) 39:060 incorporating Title 40 Code of Federal Regulations (CFR) §270.42(c). The proposed changes include:

- Addition of processing overpacked and non-overpacked drained and containerized VX warheads at the SDC 2000 Facility
  - Updated Permit Application Language
  - Revised Permit Language
  - Part A Revisions

These proposed changes are being submitted as Class 2 modifications requiring approval consistent with 40 CFR § 270.42(d)(2)(ii)(B) and 40 CFR § 270.42 Appendix I (d) *Other Modifications* (1) *In the case of modifications not explicitly listed in appendix I of this section, the permittee may submit a Class 3 modification request to the Agency, or he or she may request a determination by the Director that the modification should be reviewed and approved as a Class 1 or Class 2 modification. If the permittee requests that the modification be classified as a Class 1 or 2 modification, he or she must provide the Agency with the necessary information to support the requested classification.* These modifications do not change the Permittees' ability to provide protection to human health and the environment.

\*Items in **RED** have been added and items with a strikethrough have been removed.

## 2.0 JUSTIFICATION AND DESCRIPTION OF PERMIT MODIFICATION

Per 401 KAR 39:060 Section 5 and 40 CFR §270.42(b)(1), the applicant is required to describe and explain the need for the modifications. The following section of this PMR describes and discusses the rationale for these modifications.

This permit modification seeks approval for the incorporation of processing overpacked and non-overpacked, drained, containerized VX warheads at the SDC 2000 facility. These modifications are vital to ensure the contingency operational readiness of SDC 2000 post the completion of the GB campaign. Additionally, the enhanced capability to process VX at the SDC 2000 facility will effectively address any anticipated operational challenges in handling VX munitions at the SDC 1200. The proposed alternative presents operational flexibility through the utilization of well-established and innovative technologies currently in use. Requested Revisions to SDC 2000 Permit Language

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**S.III.A.(1) Permitted Waste Streams, Descriptions, and Codes**

Waste Stream	Waste Codes	Process Codes and Waste Description
S.1	D001, D003-D011, N001, <b>N002</b>	X99, S01, and T04; Separated GB <b>or VX</b> M56 Rocket Warhead Sections in canisters and/or overpacks (drained and undrained)
S.2	D001, D003, D008, N101, N102, N001	X99; Agent contaminated GB M67 Rocket Motors with Shipping and Firing Tubes (SFTs) in overpack containers and uncontaminated GB and VX rocket motors in a SFT and/or overpack container.
S.3	<del>D001, D003-D011, D026, D037, N001</del>	<del>X99, S01, and T04; GB Rockets and SFTs with or without overpack containers</del>
S.4	<del>D001, D003-D011, N001, N002</del>	X99, S01, and T04; Agent and or Explosive Contaminated Secondary Waste to be Treated in the Static Detonation Chamber (SDC)
S.5	D004-D011, D022, N201, <b>N202</b>	S01; SDC Residue – Metal Munition Fragments and Ash
S.6	D004-D011, D022, N001, <b>N002</b>	S01; Buffer Tank Solid Residues
S.7	D004-D011, D022, N201, N001, <b>N002</b>	S01; Cyclone Dust Residues and Filters
S.8	D002, D004-D011, N801, <b>N802</b>	S01 and S02; Off-gas Treatment System (OTS) Scrubber Liquids
S.9	D001, D004-D011, N001, <b>N002</b>	S01; Agent Derived, Listed Secondary Waste
S.10	D001-D011, D018, D019, D022, D027-D030, D039, D040, F001-F005, N001, <b>N002, N701, N702, N801, N802, N901, N902, N1001, N1002</b>	S01; Miscellaneous Maintenance and Secondary Waste including but not limited to PPE, Oils, Hydraulic Fluids, Paints, Solvents, and Other Wastes Exhibiting Characteristics or Potentially Listed
S.11	D001-D011, D018, D019, D022, D027-D030, D035, D038, D039, D040, F001-F005, P098, P106, U002, U003, U044, U080, U154, U188, U196, U213, N001, <b>N002, N701, N702, N901, N902, N201, N801, N1001, N1002</b>	S01; Lab Wastes and Solvents from Testing for GB <b>or VX</b> Agent and by-product contamination
S.12	D002-D011, N001, <b>N002, N901, N902</b>	S01; Spent Decontamination Solutions
S.13	D004-D008, D010, D011, D022, N001, <b>N002</b>	S01; Agent Contaminated Carbon Filters, HEPA Filters, and Prefilters determined to have been exposed to agent
S.14	<del>D008, N101</del>	<del>S01; SFT Warhead Sections generated from ECM rocket line operations</del>

**S.III.A.(3) Waste Codes**

The following are listed hazardous wastes:

Code	Hazardous Waste
N001	GB (isopropyl methyl phosphono-fluoridate) and related compounds (H)
N001	Process Waste (Agent and or Explosive Contaminated Secondary Waste, Buffer Tank Solid Residues, Cyclone Dust Residues and Filters, Agent Derived, Listed Secondary Waste) associated with GB munitions
N001	Non-process wastes (PPE, filters, trash, concrete, rags, parts/tools, and related waste) associated with GB munitions
N001	Spent carbon, pre filters, and HEPA filters associated with GB munitions
N001	Maintenance/miscellaneous wastes associated with GB munitions
<b>N002</b>	<b>VX (O-ethyl-S-(2-diisopropylaminoethyl) methyl phosphonothiolate)</b>
<b>N002</b>	<b>Process Waste (Agent and or Explosive Contaminated Secondary Waste, Buffer Tank Solid Residues, Cyclone Dust Residues and Filters, Agent Derived, Listed Secondary Waste) associated with GB munitions</b>

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N002	Non-process wastes (PPE, filters, trash, concrete, rags, parts/tools, and related waste) associated with VX munitions
N002	Spent carbon, pre filters, and HEPA filters associated with VX munitions
N002	Maintenance/miscellaneous wastes associated with VX munitions
N101	Uncontaminated M67 Rocket Motor Assembly, Propellant Component of the Rocket Motor, Shipping Firing Tubes, and End-caps associated with GB munitions
N102	Uncontaminated M67 Rocket Motor Assembly, Propellant Component of the Rocket Motor, Shipping Firing Tubes, and End-caps associated with VX munitions
N201	Metal Parts Treater Residue or Static Detonation Chamber Residues and Ash, and Post Thermal Oxidizer Solids and Sludges associated with GB munitions or related wastes
N202	Metal Parts Treater Residue or Static Detonation Chamber Residues and Ash, and Post Thermal Oxidizer Solids and Sludges associated with VX munitions or related wastes
N701	Lab Wastes associated with treated GB wastes and GB containing lab wastes treated to destroy agent with caustic
N702	Lab Wastes associated with treated VX wastes and VX containing lab wastes treated to destroy agent with caustic
N801	Off-gas Treatment (OTM) condensate associated with treated GB wastes, Off-gas Treatment System liquids including Quench Fluid, Scrubber Fluids, Electrostatic Precipitator Fluids, Process Fluid Bleed Water, Post-Thermal Oxidizer Condensates and related wastes associated with Static Detonation Chamber treatment of GB munitions
N802	Off-gas Treatment (OTM) condensate associated with treated VX wastes, Off-gas Treatment System liquids including Quench Fluid, Scrubber Fluids, Electrostatic Precipitator Fluids, Process Fluid Bleed Water, Post-Thermal Oxidizer Condensates, and related wastes associated with Static Detonation Chamber treatment of VX munitions
N901	Spent Decontamination Solution associated with treated GB wastes
N1001	GB contaminated waste equipment, tools, and construction materials that have been decontaminated in accordance with United States Army Guidelines and have been determined to be safe for storage or transport, and approved by the Cabinet as no longer acutely hazardous
N1002	VX contaminated waste equipment, tools, and construction materials that have been decontaminated in accordance with United States Army Guidelines and have been determined to be safe for storage or transport, and approved by the Cabinet as no longer acutely hazardous

**S.III.F.(2) Air Monitoring Requirements**

Should an off-normal event (as defined in SII.C.(23)) occur that could potentially degrade the ability to maintain/operate it properly IAW with permit condition SII.D.(6), hazardous waste feed will be prohibited. If both OTS MINICAMS/DAAMS need to be taken offline at the same time to ensure their fidelity, an immediate request for approval will be presented to KDEP for the recovery action(s) and that approval is required prior to pausing agent monitoring of the OTS. At no time will hazardous waste processing be allowed to resume until the recovery action(s) are complete and the OTS stack monitoring equipment is verified to be in control and back online to ensure permit compliance.

**Airborne and Related Exposure Limits for VX**

<b>Level</b>	<b>GPL</b>	<b>WPL</b>	<b>STEL<sup>(a)</sup></b>	<b>VSL<sup>(b)</sup></b>
<b>Averaging Time</b>	24 hrs.	12 hrs.	15 min	Variable
<b>Limit (mg/m<sup>3</sup>)</b>	6x10 <sup>-7</sup>	1x10 <sup>-6</sup>	1x10 <sup>-5</sup>	1x10 <sup>-5</sup>
<b>Monitoring Method<sup>(e)(f)</sup></b>	Historic	Historic	Near real-time (NRT)	NRT

**S.III.F.(3) Environmental Releases**

The Permittee shall operate the facility to prevent an environmental release of hazardous waste or hazardous waste constituents. An environmental release shall include but is not limited to the following:

- a. Confirmed agent detection equal to or greater than 0.50 VSL of GB or VX at the ECM Ventilation Stack, or otherwise releasing agent from the ECM
- b. Confirmed agent detection equal to or greater than 0.50 VSL of GB or VX at any EB Ventilation Stack, or otherwise releasing agent from the SDC EB
- c. Confirmed agent detection equal to or greater than 1.0 VSL of GB or 0.33 (10 VSL) of VX or confirmed agent detection equal to or greater than a monitoring level equivalent to 0.0001 mg/m<sup>3</sup> GB or 0.0003 mg/m<sup>3</sup> at the OTS stack
- d. Confirmed agent detection of agent equal to or greater than general population limit (GPL) at a perimeter monitoring location
- e. Confirmed detection of agent in an area that is not under engineering controls or in an airlock that is opened to the environment
- f. Confirmed detections during movement of containers in accordance with S.III.I.(14)
- g. The non-transient loss of engineering controls in an agent contaminated area that results in category A, category B, category A/B, or category C air pressures equal to or greater than the ambient air pressure in category D areas
- h. A release of agent outside of engineering controls

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**S.III.I.(9) Permitted Container Storage**

S.III.I.(9)(a)	Earthen Covered Magazine (ECM)	Chemical agent (GB) filled M55 rockets with M441 shipping and firing tubes (SFTs) with or without a single-round container overpack, chemical agent filled (GB) containerized M56 rocket warheads (CRWs) (drained or undrained), containerized M56 rocket warheads in overpacks, and M67 rocket motors contained within wooden storage and shipping crates or overpack containers and separated shipping and firing tube warhead sections Waste streams S.1-S.3 specified in S.III.A.(1).	D001, D003-D011, D026, D037, N101, and N001, <b>N002</b>	16,000 gallons; 2550 M56 warheads in RWCS Canisters 240 rocket motors, or a combination of these items not to exceed 500,000 pounds (lbs.) Net Explosive Weight (NEW) maximum Pallets, skids, and wooden crates shall be stacked no more than two high and ensure safe storage of containers and munition items While N001 waste is present, the ECM door shall remain closed when the ECM is not being accessed	Spill pallets; portable secondary containment units
S.III.I.(9)(b)	SDC Storage Area	Munitions Items to be treated and various process wastes, and secondary wastes that will be generated at the SDC-2000. Waste streams S.1 – S.13 specified in S.III.A.(1).	D001-D011, D018, D019, D022, D027-D030, D035, D038, D039, D040, F001-F005, P098, P106, U002, U003, U044, U080, U154, U188, U196, U213, N001, <b>N002, N101, N102, N201, N202, N701, N702, N901, N902 and N1001, N1002</b>	<del>3,000</del> <b>4,000</b> gallons, Storage shall not exceed 100 M56 Warheads in canisters (323 lbs. NEW), 16 M56 Warheads in retrofit Single Round Containers (SRC) (51.68 lbs. NEW), 15 M55 Rockets in SRCs (337.95 lbs. NEW), 15 M55 Rockets palletized (337.95 lbs. NEW), 16 M55 Rockets in Package In-transit Gas (PIG) Shipping Container (360.48 lbs. NEW), 25 M56 warhead overpacked canisters (80.75 NEW), or 60 rocket motors	Spill pallets; portable secondary containment units.
S.III.I.(9)(c)	OTS Storage Area A	Secondary wastes including waste streams S.6 – S.13 specified in S.III.A.(1)	D001-D011, D018, D019, D022, D027-D030, D035, D038, D039, D040, F001-F005, P098, P106, U002, U003, U044, U080, U154, U188, U196, U213, N001, <b>N002, N201, N701, N801, N802, N901, N902, N1001</b>	<del>2,500</del> <b>3,500</b> gallons; 0 lbs. NEW Greater than 1 VSL waste shall not be stored in this area	Spill pallets; portable secondary containment units
S.III.I.(9)(d)	OTS Storage Area B	Off Gas-Treatment System liquid waste; S.6 – S.13 specified in S.III.A.(1).	D002, D004-D011, N801, <b>N802</b>	40,000 gallons; 0 lbs. NEW Two (2) 18,000-gallon portable containers	Secondary containment integral to the containers; spill pallets; portable secondary containment units

**S.III.X.(2) Off-gas Treatment**

Prior to initiating a feed event and while agent waste is being treated in the SDC 2000 the permittee shall:

- a. Continuously operate the Thermal Oxidizer (THO) in accordance with Attachment D, Process Information and S.III.X.(8) Operating Parameters

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- b. Continuously operate an induced draft (ID) fan to maintain the THO and OTS at a pressure which is equal to or below the ambient air pressure
- c. Maintain a redundant ID fan and place it into service immediately in the event of a failure of the primary fan
- d. Maintain a backup power supply to continuously operate the OTS and implement its use in the event of an interruption in the primary power source
- e. Continuously operate a carbon filtration unit with dual banks of carbon to filter the OTS process stream prior to releasing the stream to the atmosphere,
  - i. If agent is detected between banks of carbon above the alarm setpoint, waste feed shall be stopped, the carbon filter unit shall be taken offline once any items in the DC are fully treated, and the carbon beds shall be replaced prior to feeding waste to the SDC.
  - ii. The permittee shall provide notification to the Director prior to performing carbon filter changeout in accordance with S.II.F. The notification shall include information explaining the necessity of the changeout.
- f. OTS liquid shall not be shipped offsite unless it is cleared to less than 52 µg/L GB or less than 80 µg/L VX.

### S.III.AA.(3) SDC 2000 Facility – Standards for Pressure Relief Devices in Gas/Vapor Service

Pressure safety valves (PSVs) and pressure safety elements (PSEs) in gas/vapor service within the SDC2000 facility that have the potential to contact hazardous waste gas/vapor streams greater than or equal to 10 percent by weight (wt.%) organics in the chemical agent GB and VX campaigns are located within an area serviced by the SDC 2000 Enclosure Building HVAC System, which serves as a closed-vent system capable of capturing and transporting leakage from the pressure relief devices to a control device as described in 40 CFR 264.1060; therefore, these are exempted from monitoring requirements per 40 CFR264.1054(c).

### S.III.CC.(3) Excluded Units

- (a) The following containers are excluded from regulation under Subpart CC:
  - (i) Containers with a capacity less than 26.4 gallons (0.1 m3).
  - (ii) Rocket warheads and warhead canisters containing up to approximately 1.2 gallons of Chemical Agent GB or VX and approximately 3.23 pounds (lbs.) of energetics, with total volume <0.0076 m3, and M55 rockets containing up to approximately 1.2 gallons of Chemical Agent GB, approximately 3.23 pounds (lbs.) of energetics, and approximately 19.3 lbs. of propellant, with a total volume <0.021 m3.
  - (iii) Overpack containers designed to hold a single leaking rocket.
- (b) Should conditions change such that the Permittee is no longer able to claim the exclusions or exemptions identified in Appendix C-1, the Permittee shall immediately notify the Director and shall comply with the requirements of 40 CFR 264 – Subpart CC

### S.III.X.(5) Ramp-up and Demonstration Testing

- g. For each munition item listed in S.III.X.(5)(f), the Permittee shall measure the OTS stack emission rates for all Constituents of Potential Concern (COPCs) identified in the Multi-Pathway Human Health Risk Assessment (MPHHRA), Attachment N, excluding chemical agent VX the non-campaign agent.

1 **S.III.X.(9) Performance Standards**

2 c. Emissions of the Constituents of Potential Concern, listed in the Multi-Pathway Human Health  
3 Risk Assessment (MPHHRA), excluding ~~chemical agent VX~~ **the non-campaign agent**, shall  
4 be less than or equal to emission rates use as the basis for the MPHHRA.

5 **3.0 PART B SUPPLEMENTAL INFORAMTION**

6 The SDC 2000 Permit Application including affected permit documents i.e. Waste Analysis Plan  
7 Summary, RCRA Operating Parameters, and Feed Prohibitive Interlocks has been updated to  
8 include information for chemical agent VX and is attached to this submittal (24915-70-GPE-  
9 GGPT-00012, Rev. 5).

10 **4.0 SUPPORTING INFORMATION AND DESCRIPTIION OF**  
11 **REQUESTED PERMIT CHANGES**

12 **4.1 Required Permit Documents Updates**

13 Updated Demonstration Test Plans to include VX.

14 **5.0 CLASS OF PERMIT MODIFICATIONS**

15 The proposed changes are being submitted as Class 2 modifications in accordance with 40  
16 CFR § 270.42(d)(2)(ii)(B) and 40 CFR § 270.42 Appendix I (d) Other Modifications (1) In the  
17 case of modifications not explicitly listed in appendix I of this section, the permittee may submit  
18 a Class 3 modification request to the Agency, or he or she may request a determination by the  
19 Director that the modification should be reviewed and approved as a Class 1 or Class 2  
20 modification. If the permittee requests that the modification be classified as a Class 1 or 2  
21 modification, he or she must provide the Agency with the necessary information to support the  
22 requested classification.

23 **6.0 OTHER APPLICABLE INFORMATION**

24 KAR 39:060 Section 5 Appendix A provides a listing of KAR 39:060 Section 5 (incorporating 40  
25 CFR 264 and 40 CFR 270) requirements); sections affected by this PMR are indicated.



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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 Application Modified or Modified Documents
<b>39:090 Sec. 1 (264 Subpart B)</b>	<b>General Facility Standards</b>			
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	✓		See Revised Application
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	✓		Se Revised Application
39:090 Sec. 1	Location standards Geological Information		✓	No Change
39:090 Sec. 1 (§264.19)	Construction quality assurance program		✓	No Change
<b>39:090 Sec. 1 (264 Subpart C)</b>	<b>Preparedness and Prevention</b>			
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
<b>39:090 Sec. 1 (264 Subpart D)</b>	<b>Contingency Plan and Emergency Procedures</b>			
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
<b>39:090 Sec. 1 (264 Subpart E)</b>	<b>Manifest System, Recordkeeping, and Reporting</b>			
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
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
<b>39:090 Sec. 1 (264 Subpart F)</b>	<b>Releases from Solid Waste Management Units</b>			
39:090 Sec. 1 (§264.91)	Required programs		✓	No Change
39:090 Sec. 1 (§264.92)	Ground-water protection standard		✓	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 Application Modified or Modified Documents
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
<b>39:090 Sec. 1 (264 Subpart G)</b>	<b>Closure and Post-Closure</b>			
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
39:090 Sec. 1 (§264.120)	Certification of completion of post- closure care		✓	No Change
<b>39:090 Sec. 1 (264 Subpart H)</b>	<b>Financial Requirements</b>		✓	No Change
<b>39:090 Sec. 1 (264 Subpart I)</b>	<b>Use and Management of Containers</b>			
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	✓		See Revised Application
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
<b>39:090 Sec. 1 (264 Subpart J)</b>	<b>Tank Systems</b>			

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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 Application Modified or Modified Documents
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
<b>39:090 Sec. 1 (264 Subpart X)</b>	<b>Miscellaneous Units</b>			
39:090 Sec. 1 (§264.601)	Environmental performance standards	✓		See Revised Application
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

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