



Environmental Permitting: Resource Conservation and Recovery Act

The [Blue Grass Chemical Agent-Destruction Pilot Plant \(BGCAPP\)](#) destroyed the last chemical weapons at the Blue Grass Army Depot near Richmond, Kentucky, July 7, 2023. During the closure process, BGCAPP is still subject to the requirements of the Resource Conservation and Recovery Act (RCRA), an environmental law governing the management of hazardous waste. RCRA ensures the safe treatment, storage and disposal of hazardous waste generated nationwide.

What is a RCRA Permit?

Facilities that treat, store or dispose of hazardous waste must first obtain a RCRA permit. This legally binding document establishes the waste management activities a facility may conduct and the conditions under which it must operate. The permit outlines facility operations, environmental performance requirements and activities the facility must perform, such as monitoring and reporting. Permits typically require facilities to develop emergency plans and train employees to handle hazards. Permits also include facility-specific requirements based on the technologies employed. The permitting agency has the authority to issue or deny permits and is responsible for monitoring the facility to ensure it complies with all permit requirements.

The U.S. Environmental Protection Agency (EPA) enforces RCRA regulations to regulate the management of hazardous waste from generation until final disposal. The EPA delegated to the [Kentucky Department for Environmental Protection](#) (KDEP) the authority to implement RCRA and KDEP has developed the Kentucky Hazardous Waste Regulations, which closely parallel the federal RCRA regulations.

Permitting Process

The process of obtaining a permit is long and complex, with reviews and comments on the permit application by both EPA and KDEP. Public participation is required and encouraged throughout the process. BGCAPP first obtained its RCRA permit from KDEP on Sept. 30, 2005.

The [Blue Grass Army Depot \(BGAD\)](#) commander is responsible for ensuring compliance with environmental laws and regulations during any operations occurring on the depot and also signs as the “owner” on the permit. As such, all issues and actions related to the permit, including correspondence, applications and modifications, are coordinated with the BGAD Environmental Office.

BGAD, as the “owner” (applicant), and Bechtel Parsons Blue Grass as the “operator” (applicant), were required to submit a RCRA application to KDEP to build, test, operate and close the plant.

Since the initial permit was issued, the project has applied for many permit modifications to address each munition type, take advantage of new technologies and meet changing environmental standards.

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. Questions may be provided to the Blue Grass Chemical Stockpile Outreach Staff at bgoutreach@iem.com or by calling (859) 626-8944. More information about environmental permitting may be found on the BGCAPP environmental activities page at www.peocwa.army.mil/bgcapp/environmental-activities-at-bgcapp/.

