



Notice of Issuance

Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) Explosive Destruction System (EDS) Draft Pueblo Chemical Depot Hazardous Waste Permit Modification

Facility: Pueblo Chemical Depot
45825 Highway 96 East
Pueblo, CO 81006-9330

EPA Identification Number: CO-13-12-23-01
Permit Number: CO-02-08-08-01
Permittee: U.S. Army

Public Comment Period is scheduled July 25 through September 8, 2014.

Written comments should be submitted to:
Doug Knappe, Permitting Unit Leader
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Email: Doug.Knappe@state.co.us

Public Meeting

To get more information on this permit modification, a public meeting is scheduled:

Wednesday, July 30 at 2:00pm
Pueblo District Attorney's Office
701 Court Street in Pueblo
Conference room on the first floor.

If you have any questions, please contact
Jeannine Natterman: 888-569-1831, ext 3303
Jeannine.Natterman@state.co.us

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has prepared a draft Hazardous Waste Storage Permit modification to incorporate the Explosive Destruction System Class 3 permit modification for the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP). The draft permit modification is being issued by the Division in accordance with its authority under the Colorado Hazardous Waste Act, C.R.S. 25-15-301 to 316, C.R.S., and the regulations there under.

Explosive Destruction System (EDS) will be used in addition to the Pueblo Chemical Agent Destruction Pilot Plant to destroy:

- Over 500 overpacked, leaking munitions currently stored at Pueblo Chemical Depot.
- Munitions stored in the chemical weapons stockpile that pose problems for the automated process at PCAPP.

The System uses explosives (cutting charges) to:
- Access the mustard agent inside the munitions.
- Destroy the explosive components of the munitions.

Chemicals will then be added to neutralize the mustard. The entire process is done inside a sealed stainless steel vessel. Before reopening the container, the absence of mustard must be confirmed by operators.

Permit Modification Details

The Explosive Destruction System (EDS) and associated structures will be located in a secure area outside the south end of G-Block on Pueblo Chemical Depot and will include.

- Two additional igloos and one outside container storage area for two 25 foot roll-offs.
 - One igloo to store and stage wastes prior to treatment in the EDS.
 - One igloo and the storage area to store wastes treated in the EDS.
- Two EDS units each with an associated tank and two containers used for treatment of waste.
- Two fabric Environmental Enclosures around each EDS unit to:
 - Provide containment for the unit.
 - Stage and unpack waste prior to treatment.
 - Treat uncontaminated over-pack containers.

- Modified Waste Analysis Plan - describes analytical methods employed for waste characterization and safe waste handling for storage igloos and EDS operation.
 - Air monitoring methods for worker protection.
 - Includes different equipment.
 - Different procedures but meets same data quality requirements and protective standard.
- Modified training plan for EDS workers.
- Modified precautions to prevent hazards.
 - Plan to address design and operating attributes of EDS unit.
 - Includes lightening protection and grounding systems.
 - Negative pressure control in the Environmental enclosures
 - Other precautions to prevent accidental ignition or reaction of wastes or releases to the environment.
- Modified contingency plan for emergency procedures associated with EDS operations.
- Process Plan that describes waste handling procedures, treatment activities, process descriptions, maintenance requirements and requirements for equipment leaks.
- Construction plans and design details:
 - Many of these have been previously approved under temporary authorization.
- Modified Closure plan that includes procedures for decontamination and partial (temporary) closure of the EDS.
- Monitoring requirements to evaluate emissions with respect to MultiPathway Health Risk Assessment.
- Compliance schedule for additional operating details and information that will be incorporated into the permit.

PROCEDURES FOR REACHING A FINAL DECISION:

The public is obligated to raise all reasonably ascertainable issues regarding any condition in the draft permit modification during the public comment period as required by 6 CCR 1007-3, Section 100.509. In accordance with 6 CCR 1007-3, Section 100.61, only those portions of the permit subject to the modification are reopened for public comment. FAILURE TO RAISE AN ISSUE OR PROVIDE INFORMATION DURING THE PUBLIC COMMENT PERIOD MAY PREVENT YOU FROM RAISING THAT ISSUE OR SUBMITTING SUCH INFORMATION IN AN APPEAL OF THE DEPARTMENT'S FINAL DECISION.

Only matters raised during the public comment period may be contested in any appeal of the permit modification (Section 6 CCR 1007-3, Section 100.506 (d)(1)(vi)).

The Division will consider all written comments on the draft permit modification prior to making a final decision on it. Following the public comment period, the Division will issue a final decision and a response to comments in accordance with 6 CCR 1007-3, Sections 100.511-512. See attached Public Notice.

For More Information About The Project, Please Contact
Jeannine Natterman, Public Involvement Coordinator
Colorado Department of Public Health and Environment
Email: Jeannine.Natterman@state.co.us

Denver Metro Area (303) 692-3303, or Toll Free 1-888-569-1831, ext. 3303

The draft Class 3 permit modification is available for review at the following Internet web address:
<https://www.colorado.gov/pacific/cdphe/pueblo-chemical-depot-hazardous-waste-storage-permit>

The draft Class 3 permit modification and Administrative Record are available for review by appointment at the following location:

Records Center 8:00 A.M. to 5:00 P.M.

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management

4300 Cherry Creek Drive South

Denver, CO 80246-1530 Call: 303-692-3331 or Toll Free 1-888-569-1831, ext. 3331

The draft Class 3 permit modification is also available for review during normal business hours at the following locations:

McHarg Park Community Center

405 Second Street

Avondale, CO 81022

(719) 947-4180 Monday - Friday, 8:30am-7:45pm

Boone Community Center (719) 947-3311

421 East 1st Street

Boone, CO 81025

Monday, Wednesday & Friday 8:00am - 3:00 pm

Robert Hoag Rawlings Public Library

100 East Abriendo Avenue

Pueblo, CO 81004

(719) 562-5600

Monday-Thursday 9:00am - 9:00pm

Friday-Saturday 9:00am - 6:00pm

Sunday 1:00pm - 5:00pm