



**COLORADO**  
 Department of Public  
 Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

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September 2, 2016

**Re: CDPHE Acceptance of the Final Site-Wide PCAPP Facility Construction Certification**

Gentlemen:

CDPHE has reviewed HGS's certification statements and documentation packages pertaining to the Facility Construction Certification (FCC) matrices for the PCAPP Facility. The FCC Documentation packages have been compiled by both BNI as well as HGS personnel with the intent of certifying the construction and installation of the following RCRA-Regulated Structures and Systems at the PCAPP Facility:

**Agent Processing Building**

- Foundation
- Subpart DD - Containment Building Certification inclusive of Roof Repairs and Fire Stops
- Tanks Installations (Tanks 1 - 12)
- HVAC/Ventilation System
- Piping System (B04 - Agent/Hydrolysate)
- Floor Sealants and Coatings
- Munition Washout Stations Cavity Access Machines (CAM Units inclusive of features specific to 155mm, 105mm and 4.2 Inch Mortar Systems)
- Munition Treatment Units (MTUs) 1 and 2;
- Piping and Lined Sumps (B05 system);
- Supplemental Decontamination Unit (B24 System - SDU);
- Autoclave (B24 System)
- Lightning Protection System



- Containment Building
- Roof Repairs
- Fire Stops

#### Agent Filtration Area (AFA)

- Foundation
- Ventilation Filter Units 1 through 10
- Exhaust Stack Installation
- Duct Work

#### AGV Corridor

- Containment Building (Subpart DD)
- Foundation
- Special Coatings

#### Brine Concentrator Feed Tanks (BCFTs) A, B and C

- Foundations
- Sealants and Coatings
- Trace Tek
- Tank Installation/Field Fabrication
- Water Recovery System (WRS) Piping - B-14 System
- Off-Gas Treatment System (OTS) - B-14

#### Brine Recovery System

- Foundation
- Special Coatings
- Piping Systems (B12)
- Filter Press Sealants and Coatings
- Off-Gas Treatment Systems (B12)
- BRS Tanks 1-3 and Subpart X Unit Code-Stamped Vessel Installation
- BRS Tank Brine Concentrator Evaporator
- Brine Concentrator Deaerator
- Brine Concentrator Feed Preheater
- Distillate Cooler
- Vent Condenser
- BC Distillate Tank
- BC Vapor Washer Tank
- BRS Crystallizer
- BRS Crystallizer Feed Tank
- BRS Distillate AC Feed Tank
- BRS Sump Liner Tank
- BRS Brine Concentrator Evaporator Feed Tank
- BRS Ancillary Equipment
- BRS Filter Press Foundation



#### Bio -Treatment Area (BTA)

- Foundations North and South
- Off-gas Treatment System (OTS) Foundations 1-4
- ICB Tank Installations (North Units 1 - 9)
- ICB Tank Installations (South Units 10 - 16)
- BTA Feed Tanks South and North (2 Ea/)
- BTA Effluent Tank
- BTA Piping System (B09)
- BTA Sealants and Coatings (North and South Areas)
- Off-Gas Treatment System (North Systems 101, 201)
- Off-Gas Treatment System (South Systems 301, 401)
- OTS Moisture Separator
- BTA North ICB Foundations
- BTA South ICB Foundations
- BTA North EPDM Equipment Liners 1 - 4
- BTA North ICB HDPE Liners 1 - 8
- BTA South EPDM Equipment Liners 1 - 4
- BTA South ICB HDPE Liners 1 - 8

#### ERB (Subpart DD - Containment Building)

- Foundation
- Subpart DD - Containment Building
- Special Coatings
- Ventilation and Filtration System - Duct work installation
- Fire Barriers

#### MSM/MSM Corridor

- MSM Foundations 1 - 3
- Munitions Transport Corridor (MTC) Foundation
- MSM Sealant and Coatings (MSMs 1 - 3)
- MTC Coatings
- MSM Ventilation (MSMs 1 - 3)
- MSM MTC Ventilation/Filtration

#### ESM/ESM Corridor

- ESM Foundation
- ESM Coatings
- ESM Corridor Coating System
- ESM Ventilation System

#### Pipe Rack

- H2Obvious
- Foundations (Phase II)

#### 30-Day Tanks (Tanks A, B and C)

- Foundations
- Tank Installation/Field Fabrication
- Sealant and Coatings (Floors - Polyurea)



- Sealant and Coatings (Floors - Phenicon)
- Off-Gas Treatment System
- Trace Tek

Facility Piping/Vent Piping Systems Welding (including the following; B02, B03, B04, B05, B09, B11, B12, B14, B20, B24).

The Division has reviewed each of the aforementioned documentation packages and has accepted each of HGS's system-specific certification statements. Furthermore, CDPHE has concurred that the Document Summary Sheets and the supporting data elements have provided information that meets the requirements delineated in each set of system-specific FCC matrices.

During the week of August 6 through the 14<sup>th</sup> CDPHE has observed the PCAPP Facility's Integrated Operations Demonstrations (IODs). These IODs were intended to demonstrate overall facility preparedness for conducting Initial Agent Operations with mustard-containing munitions and are a critical component for conducting the Operational Readiness Review for the PCAPP Facility.

After observing the IOD activities, CDPHE did not observe any actions or conditions that were not compliant with the requirements of the Pueblo Chemical Agent - Destruction Pilot Plant (PCAPP) - RCRA RD&D Permit.

Based on the Division's review of the FCC documentation provided for each system as well as the observation of the site IODs and a final facility walk through (conducted by CDPHE personnel on September 1 and 2, 2016), CDPHE accepts HGS's overall certification of the PCAPP facility and is in agreement that the facility is authorized to commence treatment and/or storage of hazardous wastes and is compliant with Condition I.E/16 as well as Condition II. Q of the Pueblo Chemical Agent - Destruction Pilot Plant (PCAPP) - RCRA RD&D Permit.

Please feel free to contact me with any questions or comments regarding this acceptance.



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**Hazardous Materials and Waste Management Division**  
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## Notice of Inspection

Facility Name <b>PCAPP</b>		EPA I.D.# <b>CO8213820725</b>	Date <b>9/1/16 - 9/2/16</b>
Street <b>45825 Highway 96 East</b>		Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Hour In: <b>8:30 AM</b>
City <b>PUEBLO</b>	County <b>PUEBLO</b>	Zip <b>81006</b>	Hour Out: <b>NOON</b>
Facility Representatives <b>MIKE SAUPE</b>		Enter By: <input checked="" type="checkbox"/> Consent <input type="checkbox"/> Warrant	Agency: <input checked="" type="checkbox"/> State <input type="checkbox"/> Oversight <input type="checkbox"/> Joint
Titles <b>ENVIRONMENTAL PERMITTING MGR.</b>		Telephone # <b>(719)-549-4111</b>	
RCRA Info NOTIFICATION ACTIVITIES <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input type="checkbox"/> LDF, <input checked="" type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, <input type="checkbox"/> Transfer facility or Other <input type="checkbox"/> To Change Status; Facility must send Letter or Revised Notification.			

Comments:

*FINAL WALKTHRU INSPECTION, PRIOR TO HAZARDOUS WASTE OPERATIONS. OBSERVED ALL MAJOR AREAS OF FACILITY. MINOR REPAIRS UNDERWAY ON TWO MMAS COATINGS, BRS FILTER PRESS BLDG, AND PCFT SECONDARY CONTAINMENT. REPAIRS FOR COATINGS WILL BE COMPLETE PRIOR TO WASTE MANAGEMENT IN THOSE AREAS. NO ISSUES IDENTIFIED THAT PRECLUDE PERMITTED OPERATIONS.*

*NOI SERVES AS INSPECTION REPORT -*

**Assistance Delivered During Inspection (for internal use - check ALL that apply):**

**Compliance Assistance:**

Generator Handbook  Field Assistance  
 Other guidance documents  Referral to another program  
 Change in generator status  downward  upward

**Pollution Prevention:**

Guidance/Referral  
 Field Assistance

**Current Waste Minimization:**

Product Substitution  
 Distillation of solvents on site  
 Elementary Neutralization  
 Other

Samples, Documents, Plans, and / or Photos Collected	3.
1.	
2.	4.

State personnel will review the facts established by this inspection. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: **CLAY TRUMPOLT**

Assisting Inspector(s) and Multimedia Participant(s)

**JARED TORSTENSON**  
**JAMES HINDMAN**  
**BANDY PERLIS**

*[Signature]*  
 Signature of Facility Representative