



**COLORADO**  
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June 06, 2019

**RE: CDPHE review and partial approval of Temporary Authorization Request for initiating early construction of the Static Detonation Chamber (SDC) Site - Class 3 Permit Modification Request No. 19-005, Permit # CO-13-12-23-01, Pueblo Chemical Depot (PCD), Pueblo, Colorado.**

(File: PDI 2.4.1)

Gentlemen:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has reviewed the Pueblo Chemical Depot (PCD) Temporary Authorization (TA) Request to perform early construction of the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) Static Detonation Chamber (SDC) Site. The temporary authorization request is intended to allow PCAPP SDC site to begin early construction of infrastructure associated with the Class 3 Permit Modification Request (19-005) to add three SDC units to the PCD Hazardous Waste Permit. The three SDC units are expected to augment the PCAPP Main Plant operations to meet treaty deadlines. Early site construction will involve site grading, grubbing, utility connections, installation of infrastructure (i.e., roads and parking), and establishment of the SDC Off-gas Treatment System (OTS) and the Waste Laydown Yard (WLY) foundations.

Based upon CDPHE's review of the initial TA Request submitted on April 19, 2019, the May 2 PCD clarification statement of the initial TA request, the May 9 Facility Construction Certification (FCC) matrix packages, and the May 29 PCD Notice of Deficiency Responses, including the revised FCC matrices, the Division will grant partial approval of the TA Request. The Division agrees with the proposed early construction of infrastructure outside of the PCD Chemical Limited Area (CLA), as indicated in Table 1 of the May 9, 2019 TA request. For areas inside the CLA, the Division has



determined that it is appropriate to provide authorization for PCD to proceed with early construction activities, not extending beyond wet cure and removal of formwork for the SDC-OTS Concrete Foundations and Waste Laydown Yard Foundation. Please be advised that this Temporary Authorization does not include application of coatings or early construction of the Lonex 4000 and 16000 foundations. It is understood that, per the May 29, 2019 NOD response, that PCD will submit the Lonex foundation drawings as a part of a future TA request.

In an effort to ensure a clear understanding of the construction items being authorized for early construction inside the CLA, the Division has reproduced and expanded the list of activities in Table 1 of the May 9 TA clarification. PCD and PCAPP may proceed with the following activities:

1. Overall site characterization, grading, grubbing
2. Construction of associated Infrastructure, including:
  - a. Fencing
    - i. Installation of Security Fencing and Electronic Security System (ESS)
    - ii. Re-establish original G-Block double fence north of SDC site
  - b. Utility Connections (electricity, natural gas, communication)
    - i. Connections may be run under the CLA double fence (east side) - the lines will stop in the area of the firewater tanks just outside of the CLA 30-foot clear zone then go underground, under the fences, to a switch gear.
  - c. Excavate/lay/backfill/compact duct bank, pipe and conduit for utilities from double fence to distribution (stub out) points inside CLA and within the foundation footprint
3. Firewater System
  - a. Run new firewater piping under the CLA double fence (east side)
  - b. Excavate/lay/backfill/compact new firewater piping
4. Site Access Roads
  - a. Grade, lay/compact sub-base and asphalt road, to include:
    - i. Extend east road from H-1102 to southern E-W G-Block road
    - ii. Remove east-west connector north of EDS pads
    - iii. Install new east-west connector north of future SDC pads
    - iv. Adjust road widths for emergency services
    - v. Modify required culverts, as necessary
5. Support Equipment (fire water, lighting, electrical equipment)
  - a. Install fire hydrants
  - b. Install high mast lighting with dedicated foundations
  - c. Install electrical equipment (switch gear (1), distribution panel (3), transformers (3), EDG load bank (3) on new separate dedicated pads)
  - d. Emergency Diesel Generators (EDG) (3) - install EDGs on existing EDS foundations (one per foundation)
  - e. Lightning Protection System, Underground Elements
6. Waste Laydown Yard
  - a. Subgrade preparation
  - b. Soils testing, including structural backfill, soil density
  - c. Over Excavate, as required
  - d. Structural backfill
  - e. Concrete Formwork and Placement
  - f. Embedded items, including specified anchors, piping, electrical
  - g. Pouring concrete, monitoring cure, testing
  - h. Formwork removal and surface repair
  - i. As-built survey



7. SDC-OTS Concrete Foundations (FCC Matrix)
  - a. Subgrade preparation
  - b. Soils testing, including structural backfill, soil density
  - c. Over Excavate, as required
  - d. Structural backfill
  - e. Concrete Formwork and Placement, including secondary containment curbs
  - f. Embedded items, including specified anchors, piping, electrical
  - g. Pouring concrete, monitoring cure, testing
  - h. Formwork removal and surface repair
  - i. As-built survey

In association with this work, the Division concurs with the proposed FCC certification matrices for the Waste Laydown Yard (WLY) Foundation, the SDC-OTS Foundation, and the associated SDC Underground Elements of the Lightning Protection System (LPS-UG).

If you have any questions or comments regarding these changes, please feel free to contact me at (303) 692-3426.

Sincerely,



Kevin Mackey, Unit Leader  
Hazardous Waste Permitting Unit  
Hazardous Materials and Waste Management Division

cc: Jesse Newland, U.S. Environmental Protection Agency Region VIII  
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