



DEPARTMENT OF THE ARMY
U.S. ARMY CHEMICAL MATERIALS ACTIVITY
PUEBLO CHEMICAL DEPOT, BUILDING 1
45825 HIGHWAY 96 EAST
PUEBLO, COLORADO 81006-9330

Chron22-00863

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
Attention: Mr. Kevin Mackey
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

RE: Permit Modification Request B046, *Waste Analysis Plan, Table D-8-1, Revisions to 24852-GPP-GGL-00302*, Non-Export Controlled Information (Non-ECI) submittal

Dear Mr. Mackey:

The Permittees at the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) are submitting the enclosed Class 2 Permit Modification Request B046 to revise the laboratory document 24852-GPP-GGL-00302 (*DAAMS by GC-MSD*) listed in Table D-8-1 in Attachment D, *Waste Analysis Plan*, of the PCAPP Permit, No. CO-20-09-02-01. The proposed revisions include laboratory method improvements to address the increase in instrument maintenance caused by interference observed during the analysis of Depot Area Air Monitoring System (DAAMS) samples collected from the Static Detonation Chamber (SDC) Complex. This request requires prior Colorado Department of Public Health and Environment (CDPHE) approval.

A request for temporary authorization to implement the proposed revisions is being transmitted in accordance with 6 CCR 1007-3 §100.63(e) in a separate letter (Chron22-00864). An Export Controlled Information (ECI) version of this PMR is being transmitted via a separate letter (Chron22-00865).

For all technical matters, please contact Mr. Michael Saupe, Bechtel Pueblo Team Environmental Manager, at (719) 549-5455. For all other matters related to the request, please contact Dr. Patrick Sullivan with the Assembled Chemical Weapons Alternatives staff at (719) 549-4523.

Sincerely,

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Jason A. Lacroix * Date
Colonel, U.S. Army
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Ailes, Todd

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Todd Ailes * Date
Project Manager
Bechtel Pueblo Team

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Walton W. Levi * Date
Site Project Manager
Pueblo Chemical Agent-Destruction Pilot Plant

Enclosures

CC:

Ms. Carmen Howard, Pueblo County Planning/Development, 229 West 12th Street,
Pueblo, CO 81003-2810

Mr. Jesse Newland, US EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129

Mr. Walton W. Levi, PCAPP, 45825 Highway 96 East, Pueblo, CO 81006-9330

PCAPP Document Control Center, 45825 Highway 96 East, Pueblo, CO 81006-9330

Mr. Jamal Albaiz, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo, CO
81006-9330

Mr. Trevor Klotz, Sentinel, 650 South Cherry Street, Ste 1140, Denver, CO 80246

*In accordance with 6 CCR 1007-3 Sections 100.12 and 100.42(k), I certify under penalty of law that, except as specifically noted, this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

PCAPP Permit Modification Request

Permit Number: CO-20-09-02-01

Permit Modification Request Title: *Waste Analysis Plan, Table D-8-1, Revisions to 24852-GPP-GGL-00302 (Modification B046)*

Classification: Class 2 Permit Modification Request

Description of Changes:

The Permittees at the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) request approval of this Class 2 permit modification request (PMR) to revise the laboratory document 24852-GPP-GGL-00302 (*DAAMS by GC-MSD*) listed in Table D-8-1 in Attachment D, *Waste Analysis Plan*, of the PCAPP Permit, No. CO-20-09-02-01.

The laboratory document 24852-GPP-GGL-00302 contains Export Controlled Information (ECI). An ECI version of PMR B046 (Chron22-00865) includes this laboratory document with descriptions of and rationales for the proposed changes. This non-ECI version of the PMR does not include the laboratory document.

A request for temporary authorization to implement the proposed modifications is being transmitted in accordance with 6 CCR 1007-3 §100.63(e) in a separate letter (Chron22-00864).

List of Permit Modifications

The proposed revision to the List of Permit Modifications provides a description of the revisions to the permit pursuant to approval of this request (Enclosure 1).

Attachment D, WAP

The proposed change to the revision number from “008” to “009” for 24852-GPP-GGL-00302 (*DAAMS by GC-MSD*) in Table D-8-1 is shown in Enclosure 2.

24852-GPP-GGL-00302, Revision 009

The laboratory method 24852-GPP-GGL-00302 was previously updated to Revision 008 to include a new sample analysis technique for the Depot Area Air Monitoring System (DAAMS) samples collected from the Static Detonation Chamber (SDC) Complex. This Revision 008 was submitted with PMR B017, which was approved by the Colorado Department of Public Health and Environment (CDPHE) on October 11, 2021. After samples were analyzed using the new sample analysis technique, it was determined that the system of the technique was reduced in quality by a chemical material that caused interference in the analysis. This chemical material,

not related to mustard agent (HD), complicated the analysis of the samples. This interference issue has been addressed in this Revision 009 by including a new set of analysis techniques that effectively prevents degradation of the system (interference presence). Also included in the previous Revision 008 was an inadvertent change to how a calibration curve is treated. This change has been modified in this Revision 009 by reverting back to the same treatment of calibration curves included in Revision 007.

The proposed changes are shown using “track changes,” and the explanations for the changes are annotated using “comment balloons” within the laboratory document in Enclosure 3.

Justification for Changes:

The proposed revisions include laboratory method improvements to address the increase in instrument maintenance caused by interference observed during the analyses of SDC DAAMS samples. These proposed revisions are necessary to prevent disruption of ongoing laboratory waste sampling and analysis and waste management activities during operations.

Justification for Classification:

In accordance with 6 CCR 1007-3 Part 100, Section 100.63 and Appendix I to Section 100.63, the following supports the determination that this PMR meets the criteria for classification as a Class 2 modification.

- 6 CCR 1007-3 Part 100, Appendix I, B.1.d.: Other requested changes to waste sampling or analysis methods that are not considered to be in response to agency guidance or regulations, associated with F039 (multi-source leachate) sampling or analysis methods, and associated with underlying hazardous constituents in ignitable or corrosive wastes. (Class 2 modification)

Enclosures:

- Enclosure 1: Proposed revisions to the *List of Permit Modifications*, with changes depicted using “track changes”
- Enclosure 2: Proposed revisions to Attachment D, *Waste Analysis Plan*, with changes depicted using “track changes”
- Enclosure 3: Proposed revisions to the *DAAMS by GC-MSD (24852-GPP-GGL-00302)*, with changes depicted using “track changes”

Enclosure 1

Proposed revisions to the *List of Permit Modifications*,
with changes depicted using “track changes”

Complex permit application to use and incorporate the LAMP and LQCP as reference documents. This PMR also updates the revision numbers and issue dates of the LAMP and LQCP in the WAP.

Modification: [B012](#) Class: [2](#) Effective Date: [November 17, 2021](#)
Title: 30-day Hydrolysate Storage Tanks - Hydrolysate Air Cooler Bypass
Summary: This permit modification revises Figure L-6 and section B04 1.3.4 in the Operations Plan, Attachment L to add a carbon steel bypass line at the Hydrolysate Air Cooler to mitigate plugging issues during 30-day storage tank hydrolysate recirculation flow.

Modification: [B027](#) Class: [1WA](#) Effective Date: [November 19, 2021](#)
Title: Administrative Changes to BRS Compliance Table
Summary: Class 1 Permit Modification Request (PMR) that makes administrative and informational changes by deleting redundant, duplicate entries and correcting typographical errors in compliance table L-10 of the Operations Plan.

Modification: [B028](#) Class: [1WA](#) Effective Date: [November 22, 2021](#)
Title: Revision of Permit Condition IV.F.1. and addition of Permit Conditions IV.F.1.a. through IV.F.1.f. for Contingency of Liquid in APB Secondary Leak Detection Sump
Summary: PMR B028 revises the Permit to require the Permittees to implement the Contingency Plan, Attachment G of the Permit, any time it is determined that liquid has migrated from the secondary containment system into the environment outside the Agent Processing Building (APB) and added Permit Conditions to state the specific 6 CCR 1007-3 §264.1101(c) actions that the Permittees shall implement when the Control Room receives an alarm of liquids in an APB secondary leak detection sump.

Modification: [B033](#) Class: [1](#) Effective Date: [November 30, 2021](#)
Title: Addition of D019 Hazardous Waste Code to the Laboratory Agent Related Waste Treatment Process
Summary: This permit modification adds the hazardous waste code D019 for carbon tetrachloride to the approved codes for the treatment process performed in the laboratory to neutralize agent-contaminated waste with qualifying statement and dichloromethane to the waste description in Table V-7. This modification updates Table V-7 in Part V, Table D-5-1 in the Waste Analysis Plan, Attachment D, and Table G-7 in the Contingency Plan, Attachment G.

Modification: [B046](#) Class: [2](#) Effective Date: [\[insert date\]](#)
Title: Waste Analysis Plan, Table D-8-1, Revisions to 24852-GPP-GGL-00302
Summary: This permit modification updates the laboratory document DAAMS by GC-MSD (24852-GPP-GGL-00302) listed in Table D-8-1 in Attachment D, Waste Analysis Plan (WAP).

Enclosure 2

Proposed revisions to Attachment D, *Waste Analysis Plan*,
with changes depicted using “track changes”

Waste Analysis Plan

Attachment D

Table D-8-1 PCAPP Laboratory Analytical Methods and Procedures

Document No.	Rev. No.	Document Title	Method Based On
	(LDCR-00062)		
24852-GPP-GGL- 00301	011	Mustard Agent (HD) in Air by MINICAMS®	USEPA SW846 Methods 8260 and 8270
24852-GPP-GGL- 00302	008 009	DAAMS by GC-MSD	USEPA SW846 Methods 8260 and 8270
24852-GPP-GGL- 00303	003	DAAMS by GC-FPD	Project Developed
Procedures			
24852-GPP-GGL-DP021	000	Sample Collection Techniques	USEPA 600/2-80-018, Standard Methods, USEPA SW-846, New Jersey Department of Environmental Protection – Field Sampling Procedures
24852-GPP-GGL-LP003	005	Receipt, Storage, Transfer, Disposal, and Accountability of RDT&E Solutions	Project Developed
24852-GPP-GGL-LP004	005	Preparation of Laboratory Agent Standards	Project Developed
24852-GPP-GGL-LP005	008	Receipt, Storage, Transfer, and Disposal of Analytical and Environmental Samples	Project Developed
24852-GPP-GGL-LP012	001	Data Review and Qualification	Project Developed
24852-GPP-GGL-LP014	007	Receipt, Acceptance, and Conditioning of DAAMS Tubes, PCT's, Cold Traps, and NOx Filters	Project Developed
24852-GPP-GGL-LP015	007 (LDCR-00088)	DAAMS Tube Spiking Procedure	Project Developed
24852-GPP-GGL-MP002	003	Perimeter Monitoring Trailer Operations	Project Developed
24852-GPP-GGL-MP003	009	DAAMS Station Operation and Preventative Maintenance	Project Developed
24852-GPP-GGL-MP005	006	Heated Sample Transfer Line Spiking and Cleaning	Project Developed
24852-GPP-GGL-MP007	004	MINICAMS® and DAAMS Alarm Response	Project Developed
24852-GPP-GGL-MP008	003	Monitoring Solid Waste and Protective Equipment	Project Developed
24852-GPP-GGL-MP014	006	Real-Time Analytical Platform (RTAP) Operations and Maintenance	Project Developed
24852-GPP-GGL-NP001	004	Environmental and Hazardous Waste Sampling	USEPA SW846, Standard Methods
24852-SOP-B04-W0002	003	Glovebox Sampling	Project Developed
24852-SOP-B24-W0003	008	Secondary Waste Processing	Project Developed

Enclosure 3

Proposed revisions to the *DAAMS by GC-MSD* (24852-GPP-GGL-00302),
with changes depicted using “track changes”

The laboratory document *DAAMS by GC-MSD* (24852-GPP-GGL-00302) has been omitted because it contains Export Control/International Traffic Arms Regulations Information.

A copy of this laboratory document with appropriate Export Control markings will be submitted to CDPHE in a separate letter (Chron22-00865).