



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

Chron23-01987

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

RE: PCAPP Permit Modification Request B073, *Equipment Disassembly and Containerization*,
Temporary Authorization (TA) Request, submittal

Dear Ms. Mahr:

The Permittees at the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) are requesting a Temporary Authorization (TA) for Class 2 Permit Modification Request (PMR) B073, *Equipment Disassembly and Containerization*, to the PCAPP Resource Conservation and Recovery Act (RCRA) Permit, No. CO-20-09-02-01 (Chron23-01986).

The Permittees are seeking this Temporary Authorizations pursuant to 6CCR 1007-3 § 100.63(e), for disassembly and waste containerization of the following equipment:

- Nose Closure Removal Station (NCRS) -- MJ-B01-1200/-2200/-3200,
- Miscellaneous Parts Removal Station (MPRS) -- MJ-B01-1300/-2300/-3300,
- Burster Removal Station (BRS) -- MJ-B01-1400/-2400/-3400,
- Burster Detection System -- MJ-B01-4320/-4420/-4520 and
- the PMD gripper assembly MJ-B01-1101/-1102/-2101/-2102/-3101/-3102.
- PMD Line 2 exit conveyor (MJ-B01-4403) and swing roller (MJ-B01-4412)
- One (1) 155mm projectile CAM, MZ-B02-0205,
- One (1) 105mm projectile CAM, MZ-B02-0110,
- Eight (8) 4.2" mortar iCAMs, MZ-B02-0216/-0217/-0218/-0219/-0116/-0117/-0118/-0119, and
- Two (2) MWS Robots, MJ-B02-0201/-0101
- Category A Sump Pump MP-B05-0045,
- Spent Decon feed pumps MP-B05-0201 A/B and their recirculation piping to Spent Decon Holding Tanks (MV-B05-0201) and transfer piping to ANR up to B04 boundary,
- Spent Decon tank MV-B05-0101 recirculation piping and transfer piping to ANR up to B04 boundary,
- Abandoned category A influent piping, equipment, and components to Spent Decon Tanks (MV-B05-0101/-0201)

This TA is necessary for timely implementation of closure activities by disassembling, size reduction and containerization of Projectile Mortar Disassembly (PMD) machines, Cavity Access Machines (CAMs) and previously abandoned in place equipment/ piping from the Toxic Storage and Spent Decon (B05) system. The associated PMR for this request is being submitted in a separate letter (Chron23-01986) and a Controlled Unclassified Information (CUI) version is transmitted via Chron23-01988.

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

Sincerely,

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Rodney D. McCutcheon * Date
Colonel, U.S. Army
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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

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.