Part B Permit Application

The Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) currently operates under a Research, Development and Demonstration (RD&D) permit. The permit is used to demonstrate innovative treatment technologies that have not been established with the Environmental Protection Agency.

The RD&D permit requirements specify that the facility can only receive and process the volume of waste necessary to demonstrate the technology. As the facility moves from its current phase into pilot testing, this permit will allow operations to continue. When the Pilot Testing is complete, PCAPP will treat the remaining munitions stockpile under a Part B Permit.

Colorado Department of Public Health and Environment will review the permit application, propose a permit decision and issue a draft permit.

Public Information Meetings

Public information meetings will be held on:

- **Wednesday, Sept. 28**
  - 2 p.m.
  - District Attorney's Office
  - 701 Court Street, Pueblo

- **Tuesday, Oct. 11**
  - 4 p.m.—6 p.m.
  - McHarg Park Community Center
  - 405 2nd Street, Avondale

- **Wednesday, Oct. 12**
  - 4 p.m.—6 p.m.
  - Boone Community Center
  - 421 East First Street, Boone

About the Part B Permit Application

The PCAPP Part B permit application will include how PCAPP will meet the regulatory requirements and protect human health and the environment during operations:

- Physical description of the facility design and construction
- Types of waste that will be received, treated and managed
- Description of facility operations including munitions processing, processing of secondary waste and waste management activities
- Identification of standard operating conditions associated with waste treatment, laboratory testing, maintenance of tanks and miscellaneous units and associated instrumentation and control systems
- Record-keeping requirements
- Pollution prevention and control measures
- Responses to releases of hazardous waste, including spill prevention and spill cleanup measures
- Inspection Plan, Training Plan and Closure Plan

The Purpose of a Part B Permit

Resource Conservation and Recovery Act Part B permit specifies operating conditions and requirements for treating and storing operations in accordance with federal and state hazardous waste regulations. The Part B permit identifies permit conditions that ensure protection of human health and the environment during hazardous waste operations.
How the PCAPP Part B Permit Differs from the PCAPP RD&D Permit

The Part B application proposes a simplified format for the Part B Permit. The content of the Part B permit will essentially be the same as the current RD&D permit with the addition of updates based on the Pilot Test Demonstration. PCAPP Part B application requests the same permitted units as in the RD&D Permit.

Public Availability of the PCAPP Part B Application

An informational copy of the Part B Permit Application will be available for the general public after submittal of the application to the Colorado Department of Public Health and Environment and during regular business hours at:

- Robert Hoag Rawlings Public Library; 100 East Abriendo Avenue, Pueblo, CO 81004
- McHarg Park Community Center; 405 2nd Street, Avondale, CO 81022
- Boone Community Center; 421 East First Street, Boone, CO 81025
- Pueblo Chemical Stockpile Outreach Office; 104 West B Street, Pueblo, CO 81003
- Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division Records Center; 4300 Cherry Creek Drive South, Denver, CO 80246
https://www.colorado.gov/pacific/cdphe/pcapp

Current RD&D and Part B Proposed Permitted Units

Storage and Treatment:

<table>
<thead>
<tr>
<th>Enhanced Reconfiguration Building</th>
<th>Removes explosive components from the munitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent Processing Building</td>
<td>Agent washed out of munitions</td>
</tr>
<tr>
<td>Agent Neutralization System</td>
<td>Neutralizes agent</td>
</tr>
<tr>
<td>Munitions Treatment Unit</td>
<td>Munitions bodies are thermally treated to destroy residual agent</td>
</tr>
<tr>
<td>Secondary Decontamination Unit and Autoclave</td>
<td>Secondary waste is thermally treated</td>
</tr>
<tr>
<td>Biotreatment Area</td>
<td>Receives treated agent (a.k.a. hydrolysate) for further treatment</td>
</tr>
<tr>
<td>Brine Reduction System</td>
<td>Final treatment of bio-treated hydrolysate generates a filter cake (salt) and water suitable for reuse onsite in plant processes</td>
</tr>
</tbody>
</table>

Containment Buildings in which Treatment and Storage of Hazardous Waste Occurs:

- Munitions Service Magazines
- Enhanced Reconfiguration Building
- Automated Guided Vehicle Corridor
- Agent Processing Building
- Energetics Service Magazine

Container Storage Areas:

- Munitions Bodies Storage Area
- H-Block Igloos
- Dunnage Storage Area
- Waste Laydown Yard

About PCAPP

Located within the current boundaries of the U.S. Army Pueblo Chemical Depot (PCD), PCAPP includes a variety of facilities for purposes, including agent processing, energetic processing, control and storage, munitions storage, biotreatment, entry control, utility, laboratory, personnel maintenance and other support tasks. The Bechtel Pueblo Team was awarded the systems contract to design, construct, systemize, pilot test, operate and close the main facility.
PCAPP Facility Facts

- In 2003, a neutralization and biotreatment process was selected as the technology for destruction of the stockpiled chemical-agent munitions at PCD
- The first phase of the PCAPP RD&D Permit No. CO-04-07-01-01 was issued by the State of Colorado in July 2004
- PCAPP design and construction was in accordance with the PCAPP RD&D permit
- At this time, PCAPP construction, systemization and optimization are complete

See below for a map of the PCAPP facilities: