



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

Chron22-00868

Environmental Management Office

SUBJECT: Permit Modification Request S006, *Attachment 9, Revisions to 24852-GPP-GGL-00302*, Non-Export Controlled Information (Non-ECI) submittal  
Permit # CO-13-12-23-01, Pueblo Chemical Depot (PCD), Pueblo, CO

CONTROL #: EMO-22-048

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

Dear Mr. Mackey:

The Permittees at the Pueblo Chemical Depot (PCD) are submitting the enclosed Class 2 Permit Modification Request S006 to revise the laboratory document 24852-GPP-GGL-00302 (*DAAMS by GC-MSD*) listed in Attachment 9 of Annex 3 of the PCD Hazardous Waste Permit, No. CO-13-12-23-01. 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 (Chron22-00869; EMO-22-049). An Export Controlled Information (ECI) version of this PMR is being transmitted via a separate letter (Chron22-00870; EMO-22-050).

For all technical matters, please contact Dr. Patrick Sullivan with the Assembled Chemical Weapons Alternatives staff at (719) 549-4523. For all other matters related to the request, please contact Mr. Jamal Albaiz, PCD Environmental Management Office, at (719) 549-4252.

Sincerely,

LACROIX.JASON.ANGE LO.1012266304  
Digitally signed by LACROIX.JASON.ANGELO.1012266304  
Date: 2022.03.29 16:28:09 -06'00'

Jason A. Lacroix \* Date  
Colonel, U.S. Army  
Commanding

Ailes, Todd  
Digitally signed by: Ailes, Todd  
DN: CN = Ailes, Todd C = US O =  
Bechtel Global Corporation  
Date: 2022.03.21 16:11:01 -06'00'

Todd Ailes \* Date  
Project Manager  
Bechtel Pueblo Team

LEVI.WALTON.WAYNE.1231431558  
Digitally signed by LEVI.WALTON.WAYNE.1231431558  
Date: 2022.03.29 11:04:46 -06'00'

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

Mr. Michael Saupe, PCAPP Environmental Manager, 45825 Highway 96 East,  
Pueblo, CO 81006-9330

Mr. Trevor Klotz, Sentinel, 650 South Cherry Street, Ste 1140, Denver, CO 80246  
PCAPP Document Control Center, 45825 Highway 96 East, Pueblo, CO 81006-9330  
PCD Document Control Center, 45825 Highway 96 East, Pueblo, CO 81006-9330

\*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.

## PCD Permit Modification Request

**PCD Permit Number:** CO-13-12-23-01

**Permit Modification Request Title:** *Attachment 9, Revisions to 24852-GPP-GGL-00302 (Modification S006)*

**Classification:** Class 2 Permit Modification Request

### **Description of Changes:**

The Permittees at the Pueblo Chemical Depot (PCD) 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 Attachment 9 of Annex 3 of the PCD Hazardous Waste Permit, No. CO-13-12-23-01.

The laboratory document 24852-GPP-GGL-00302 contains Export Controlled Information (ECI). An ECI version of PMR S006 (Chron22-00870; EMO-22-050) 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 (Chron22-00869; EMO-22-049).

### **Permit Modification History**

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

### **Attachment 9**

The proposed change to the revision number from “008” to “009” for 24852-GPP-GGL-00302 (*DAAMS by GC-MSD*) 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 the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) PMR B017 and included in the PCD Permit by PMR S003, which were approved by the Colorado Department of Public Health and Environment (CDPHE) on October 11, 2021 and October 27, 2021, respectively. 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: Permit Change Page – Permit Modification History
- Enclosure 2: Permit Change Page – Attachment 9
- Enclosure 3: Proposed revisions to the *DAAMS by GC-MSD* (24852-GPP-GGL-00302), with changes depicted using “track changes”

**Enclosure 1**

Permit Change Page – Permit Modification History

## PERMIT MODIFICATION HISTORY

Mod	Class	Approval Date	Section	Page(s)	Modification
S008 (22-009) NOD (22-023)	1	2/10/2022	Annex 3 – Part VII Annex 3 – Attachment 13B	VII-10 and VII-18 13B-24, 13B-47, 13B-49, 13B-64 to 13B-66, 13B-69, and 13B-76	This modification updates Part VII to restrict shakedown feed rates to the demonstrated capabilities of the SDC units from the Non-Agent Surrogate Trial Burn, of six 4.2-inch mortars HD/HT per hour.
<a href="#">S006 (22-0048)</a>	<a href="#">2</a>	<a href="#">TBD</a>	<a href="#">Annex 3, Attachment 9</a>	<a href="#">Attachment 9-2</a>	<a href="#">This permit modification updates the revision number and date for the laboratory document DAAMS by GC-MSD (24852-GPP-GGL-00302) listed in Annex 3, Attachment 9.</a>

**Enclosure 2**

Permit Change Page – Attachment 9

ANNEX 3

Document Title	Document Number	Rev (PCN)	Date
[ECI] Mustard Agent in Aqueous Matrix by GC-MSD	24852-GPP-GGL-00204	005	10/13/2021
[ECI] Determination of HD/HT in a Solid Matrix by GC-MSD	24852-GPP-GGL-00211	004	10/14/2021
[ECI] Mustard Agent (HD) in Air by MINICAMS	24852-GPP-GGL-00301	011	10/14/2021
[ECI] DAAMS by GC-MSD	24852-GPP-GGL-00302	<del>008009</del>	<del>10/13/2021</del> TBD
[ECI] DAAMS by GC-FPD	24852-GPP-GGL-00303	003	10/15/2019
[ECI] MINICAMS Operations (10 Minute Cycle) With Dilution	24852-GPP-GGL-00310	000	4/14/2021
[ECI] Collection and Submission of Laboratory Records	24852-GPP-GGL-DP024	003	4/12/2021

Notes:

Most current approved versions will be used.

Revision date (m/d/year) correlates to date published in Electronic Document Management System

ECI        Export-Controlled Information

SOP        Standing Operating Procedure



**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 (Chron22-00870; EMO-22-050).