



# COLORADO

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December 2, 2019

**RE: CDPHE review and approval of Temporary Authorization Request #4 for construction of the SDC Environmental Enclosures, placement of IONEX Filters Units, and installation of the Above Ground Lightning Protection System (LPS) at the SDC Site - Class 3 Permit Modification Request No. 19-005, Permit # CO-13-12-23-01, Pueblo Chemical Depot (PCD), Pueblo, Colorado.**

(File: PDI 2.4.3)

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 #4) Request to construct the Environmental Enclosure, place elements of the IONEX 1000, 4000, and 16000 Filters as well as install the above ground lightning protection system (LPS) at the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) Static Detonation Chamber (SDC) Site. The temporary authorization request is intended to allow the PCAPP SDC site to continue phased construction of the aforementioned elements 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.

Be aware that the placement of the IONEX Filters cannot occur until the Division has received and approved certifications specific to the foundations for the IONEX 1000, 4000, and 16,000 for sites 1, 2 and 3. In addition, placement of the sprung structures on Pads 1 and 3 cannot occur until Division acceptance of the Facility Construction Certification (FCC) for the SDC-OTS foundations/coatings for Sites 1 and 3.



Based upon CDPHE's review of Temporary Authorization Request #4, and with the aforementioned conditions, the Division will grant approval of this TA Request and concurs with the proposed FCC certification matrices for the IONEX 1000, 4000 and 16000 Filter Units as well as the FCC matrices pertaining to the installation of the Lightning Protection.

If you have any questions or comments regarding this letter, 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  
Mike Saupe, Bechtel Pueblo Team  
Rick Workentine, Bechtel Pueblo Team  
Walton Levi, ACWA  
Pat Sullivan, ACWA  
Jody Carillo, Pueblo Department of Public Health and Environment  
Joan Armstrong, Pueblo Planning and Development  
David Kreutzer, Office of the Attorney General  
Irene Kornelly, CAC Permitting Workgroup Chair