

# STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

## HAZARDOUS WASTE PERMIT

FACILITY: PUEBLO CHEMICAL DEPOT

ADDRESS: 45825 HIGHWAY 96 EAST  
PUEBLO, CO 81006

EPA ID NUMBER: CO8213820725

DATE OF ISSUANCE: 12/23/2013

EFFECTIVE DATE: 01/22/2014

EXPIRATION DATE: 12/23/2023

PERMIT NUMBER: CO-13-12-23-01

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### **PERMIT ATTACHMENTS:**

1 – Part A & Facility Description	
2 – Procedures to Prevent Hazards (includes Storage Area Inspections, Inspection Log Sheets, and Air Monitoring Plan)	
3 – Waste Characteristics and Waste Analysis Plan	
4 – Contingency Plan	
5 – PCD Training Plan and PCAPP EDS Site Personnel Training Plan	
6 – Closure Plan	
7 – PCD Container Storage Process Information (includes Subpart CC Compliance Plan)	
8 – EDS and Environmental Enclosure Process Description (includes Subpart BB and CC Compliance Plan)	
9 – EDS Phase 2 Steam Series SOP	
10 – ECBC IOPs and SOPs	
11 – CB&I SOP for CSU H1103 Roll-off Loading	
12 – Acronyms/Abbreviations	
13 – EDS Emissions Sampling and Analysis Plan	

**STATE RCRA PERMIT NO. CO-13-12-23-01**

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Pursuant to the Colorado Hazardous Waste Act §§ 25-15-301 to 316, C.R.S., hereafter called "the Act," and the implementing regulations promulgated thereunder by the Colorado Board of Health and the Hazardous Waste Commission, 6 CCR 1007-3, and 6 CCR 1007-2, a Permit is issued to the Department of Defense, US Army Chemical Materials Activity and Pueblo Chemical Depot (hereafter called "the Permittee"), located east of Pueblo, Colorado, to operate hazardous waste storage units and two hazardous waste treatment units. The units are located at approximately 38°18'00" north latitude, and 104°20'30" west longitude.

The Permittee must comply with all terms and conditions of this Permit. This Permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 6 CCR 1007-3. Applicable regulations are those that are in effect on the date of issuance of this Permit. Since the Department has not adopted all portions of EPA's Military Munitions Rule, the Colorado Hazardous Waste Regulations (6 CCR 1007-3) supersede any references to EPA's Military Munitions Rule, including any references in documents referenced by this Permit, Permit Attachments, and associated Appendices.

This Permit is based on the assumption that the information submitted in the permit renewal application of June 2013 and the Explosive Destruction System permit modification request of June 2014 is accurate.

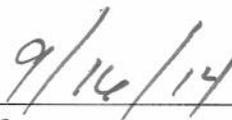
Any inaccuracies found in the submitted information may be grounds for the termination, revocation and reissuance, or modification of this Permit in accordance with 6 CCR 1007-3, §100.6, and for potential enforcement action. The Permittee must inform the Colorado Department of Public Health and Environment (CDPHE) of any deviation from, or changes in the information in the application that would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This Permit is effective as of January 22, 2014 (30 days after issuance) and shall remain in effect until December 23, 2023 (10 year duration) unless revoked and reissued, or terminated under 6 CCR 1007-3, §§100.61 or 100.25.

Signed:

  
\_\_\_\_\_  
Doug Knappe, Manager  
Hazardous Waste Permitting Unit  
Hazardous Waste Program  
Hazardous Materials and Waste Management Division  
Colorado Department of Public Health and Environment

Date

  
\_\_\_\_\_  
9/16/14

## INTRODUCTION

### Site History

The Department of Defense (DoD) owns and operates the Pueblo Chemical Depot (PCD), located east of Pueblo, Colorado. PCD was constructed in 1942 as the Pueblo Ordnance Depot. It was first used for the storage and supply of ammunition, and later its mission included ammunition renovation and demilitarization, and missile maintenance. The Depot was designated for realignment by the 1988 Base Realignment and Closure Commission. All missions, except storage of chemical munitions, were terminated on September 30, 1994, and the installation was renamed Pueblo Chemical Depot in 1996.

Currently, PCD stores mustard agent, including projectiles and mortar rounds, plus small quantities of other hazardous wastes generated during site operations and remediation efforts. The future use of PCD will be determined by the Local Reuse Authority.

### Scope of the Hazardous Waste Permit

This permit covers both storage and treatment of hazardous waste at PCD and corrective action activities at Solid Waste Management Units (SWMUs) requiring corrective action measures.

Hazardous Waste Container Storage Units: Building 540 is permitted for storage of hazardous waste such as ignitables, corrosives, reactives, metal-containing wastes, and spent solvents. Igloos G203, G1009, G1107, G1109, G1110, H1102 and H1103 are permitted for storage of both liquid-phase and solid-phase mustard agent-contaminated waste. An area adjacent to Igloo H1103 is permitted for the storage of up to two (2) covered roll-off containers for the storage of up to a total of 50-cubic yards of solid phase hazardous waste. Details about these storage facilities can be found in Part III of the Permit.

SWMU Corrective Action: Part IV of the Permit provides information on corrective action activities at SWMUs identified at PCD. This Part addresses the steps in the corrective action process and describes each SWMU. Each SWMU may be at a different step in the process at any particular time, and some SWMUs do not require any further action at this time.

Hazardous Waste Treatment Units: Two Explosive Destruction System (EDS) units which are located in Environmental Enclosures are permitted as miscellaneous treatment units at PCD. The two EDS units and Environmental Enclosures are permitted for the treatment of overpacked mustard agent munitions, Department of Transportation (DOT) bottles containing mustard agent, energetic components associated with mustard agent munitions. Details about these two EDS hazardous waste treatment units and Environmental Enclosures can be found in Part V of the Permit.

## PERMIT MODIFICATION HISTORY

<b>Mod</b>	<b>Class</b>	<b>Date</b>	<b>Section</b>	<b>Page(s)</b>	<b>Modification</b>
1	1	5/28/14	IV.E.	IV-32, 40, 44, 49, 53, 57, 105, 123	Changed reporting timeline, added RC statement for SWMU 43
2	3	9/16/14	All portions except for Part IV	All pages except for Part IV	Added 2 EDS Treatment Units and Container Storage Units H1102, H1103, & H1103 Roll-off Container Storage Area
3	Div Init	10/17/14	IV.D. IV.E.	IV-20, 21 IV-110-113, 115-118, 118-122	Added reference to IV.E. Remedy selection S38, remedy mod S25, 39
4	1	11/06/14	Attachment 2 – App 2-2	Fig 2-2-6, Fig 2-2-7	Changed inspection checklists for storage igloos
5	1	03/02/15	All portions except for Part IV	All pages except for Part IV	Multiple Class 1 modifications approved together including the following changes: deletion of completed compliance schedule items; added wastes allowed in the H1103 Roll-off Container Storage Unit; added waste codes for CSU H1103; allow direct transfer of wastes to EDS Env. Enclosure from G-Block permitted igloos; added EDS stack emission Sampling and Analysis Plan as new Attachment 13; added new revisions of SOPs, IOPs, and other plans associated with EDS operations and moved many of these plans into new Attachments 9, 10, & 11; removed EDS O&M Manual from the Permit; added text to Table 3-4-1 about disposition of secondary containment pallets; added details about decon/disposal and analysis/monitoring of EDS waste streams; added locations of emergency equipment to Table 4-2 in Att 4; formatting changes; correction of typos and other minor administrative & informational changes.