

STATE OF COLORADO

Bill Ritter, Jr., Governor
James B. Martin, Executive Director

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

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Denver, Colorado 80246-1530 8100 Lowry Blvd.
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TDD Line (303) 691-7700 (303) 692-3090
Located in Glendale, Colorado
<http://www.cdph.state.co.us>



Colorado Department
of Public Health
and Environment

February 19, 2008

Christopher Chesney, Commander
Pueblo Chemical Depot
45825 Highway 96 East
Building 1
Pueblo, CO 81006

Paul Henry, Bechtel Pueblo Project Manager
45825 Highway 96 East
Process Support Building (PSB)
Pueblo, CO 81006

Re: Inspection Close-out for PCAPP Phase I Construction Activities
EPA ID No. CO8213820725

Gentlemen:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the Professional Engineer certification submitted by you for the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) Stage IB construction activities. The engineer certification was provided in accordance with condition I.J.3 of the PCAPP Permit.

On January 23, 2008 the Division also conducted a routine Compliance Evaluation/Construction Verification Inspection of the PCAPP facility. Additional information regarding certain findings that were identified during the inspection was provided to the Division on February 6, 2008. The purpose of the inspection was to evaluate the compliance of the Phase I construction activities for PCAPP with the permit.

Based on the engineering certification and additional information you provided, the Division has determined that the Phase I construction activities for PCAPP have been completed in compliance with the permit. A copy of the final inspection report is attached for your records. No additional response or action is necessary to close-out this inspection or to address permit condition I.J.3.

We appreciate the assistance provided by your staff on the construction verification inspection and look forward to continuing to work with you during construction of the PCAPP facility. Please contact me at (303) 692-3426 if you have any questions or would like to discuss this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin P. Mackey". The signature is fluid and cursive, with the first name "Kevin" written in a smaller, more compact style than the last name "Mackey".

Kevin P. Mackey,
Environmental Protection Specialist
Permitting and Compliance Assistance Unit

Attachment: Inspection Report

cc: Larry Kimmel, U.S. EPA Region VIII
Kim Hedley, Pueblo County Planning and Development
Gary Anderson, US Army/ACWA
Heather Maio, Pueblo Health Department
Christine Hambric, ACWA
Ron Entz, BPT
James Hindman, CDPHE
Doug Knappe, CDPHE
File Code: PDI 7.1

EPA I.D. # CO8213820725

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION: January 23, 2008

FACILITY: Pueblo Chemical Depot

LOCATION: 45825 Highway 96 East

FACILITY REP: Pat Timm

TELEPHONE: (719) 549-5455

NOTIFICATION STATUS: Large Quantity Generator
Storage and Treatment Facility

TYPE OF INSPECTION: Compliance Evaluation/Construction Verification

PARTICIPANTS: Kevin Mackey, CDPHE
James Hindman, CDPHE
Kevin Weiner, BPT
Steve Nakasaki, BPT
Doug Murray, BPT
Ron Entz, BPT
Patrick Timm, BPT
Ray Turner, HGS Engineering

TIME IN: 14:00 on January 23, 2008

TIME OUT: 15:35 on January 23, 2008

PUEBLO CHEMICAL AGENT DESTRUCTION PILOT PLANT (PCAPP)

--- INTRODUCTION ---

On January 23, 2008 inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) arrived at PCAPP (Pueblo Chemical Agent Destruction Pilot Plant) to conduct an announced hazardous waste/construction evaluation inspection. The inspection conducted on January 23, 2008 focused on reviewing records pertaining to certification of the initial phases of construction (Stage 1B) of construction for the Pueblo Chemical Agent Destruction Pilot Plant. James Hindman and Kevin Mackey conducted the inspection/certification review.

--- DOCUMENTS REVIEWED ---

During the afternoon of January 23, 2008 at the Personnel Support Building (PSB), Division Inspectors, James Hindman and Kevin Mackey reviewed construction documentation records related to the certification of initial construction activities at the PCAPP.

The Division inspectors met with facility representatives in a conference room located in the PSB and requested supporting information pertaining to several Certification Items from the Phase I Construction Plan Certification Matrices (Attachment 1). Specifically, these items consisted of elements pertaining to the following Inspection Categories; Rough Grading and structural fills/site soil evaluations; Construction of the onsite Storm Sewer System; Natural Gas Pipeline Construction; Fire Water Line Construction; and, Sanitary Sewer System construction.

Specific documentation items reviewed include the following Stage 1B Matrix general categories and individual metric item numbers:

Site Grading and Structural Fill/Soil Evaluation:

- 2.3 & 2.5 – structural fill standards that consist of plasticity indices, liquid limits, dry density and optimal moisture content values that meet the requirements specified in ASTM-D-1557;
- 2.10 - The structural suitability of soils for support of the PCAPP foundations and spread footings with the design bearing pressures of 2000 and 3000 pounds/sq. foot; and,
- 2.12 – Elevation and compaction measurement equipment used for RCRA compliance units are under control of a documented calibration program.

Storm Sewer System:

- 3.1 - Construct four specified diameter pipe inlets into storm water retention basin according to site specifications; and,

- 3.4 - NPCA certification of concrete pipe supplier.

Natural Gas Pipeline:

- 4.3 – installation of detectable metallic 3” wide yellow marking tape placed 12 inches below finished grade.

Fire Water Line Construction:

- 5.5 – Piping Manufacturers testing reports and manufacturer’s certification prior to placement;
- 5.6 – Piping Flushed and 2-hour hydro tested at 200 psi in accordance with NFPA 24;
- 5.7 – Hydrant flow tested in accordance with NFPA 291; and,
- 5.8 – Hydrants must have a flow rate of at least 750 gpm.

Sanitary Sewer System:

- 6.5 – Perform leakage and deflection testing of piping.

--- INSPECTION CLOSE-OUT ---

At approximately 15:20 pm on January 23, 2008, an inspection close-out meeting was held with facility personnel including Pat Timm, Ron Entz, Kevin Weiner, Steve Nagasaki, Doug Murray, and Ray Turner. Kevin Mackey addressed the compliance inspection associated with the Stage IB metrics and completed a Notice of Inspection (NOI) that was signed by Mr. Pat Timm as the facility representative. The NOI is included as Attachment 2.

--- INSPECTION FINDINGS ---

The following coverage areas were evaluated during this inspection:


Inspectors found that documentation pertaining to all Stage 1B Matrix items reviewed during this inspection, with the exception of items 5.6 and 5.7 pertaining to Fire Hydrant Flow Testing, and Item 5.8 Minimum Hydrant design flow rate of 750 gpm, were complete and had satisfactory supporting documentation on file.

Per a previous agreement with CDPHE, onsite testing pertaining to items 5.6 and 5.7 will be delayed until verification of Stage II construction activities. Verification of item 5.8 required that PCAPP representatives provide additional information specific to flow rating curves as they pertain to system head loss values used for determining the specified fire hydrant flow rate of 750 gallon per minute (gpm). Ray Turner of HGS Engineering provided this missing documentation in an e-mail submitted to the Division on February 6, 2008. This documentation consisted of a summary of actual hydrant testing that was conducted on July 13, 2006. This documentation is included as Attachment 3 and verifies that the onsite hydrants meet the 750 gpm flow requirement.

--- SIGNATURE BLOCK ---

Prepared by: 
Kevin Mackey

2-11-2008
Date

Prepared by: 
James Hindman

02-08-2008
Date

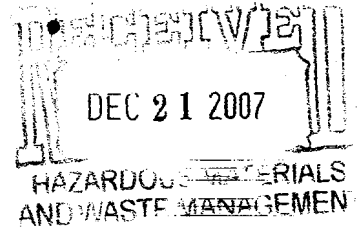
--- ATTACHMENTS ---

1. Stage 1B construction completion certification and associated matrices
2. NOI dated January 23, 2008
3. July 13, 2006 Hydrant Flow test results



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
US ARMY CHEMICAL MATERIALS AGENCY
PUEBLO CHEMICAL DEPOT, BUILDING 1
45825 HIGHWAY 96 EAST
PUEBLO, COLORADO 81006-9330



Office of the Commander

Chron07- 05233

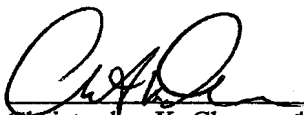
Colorado Department of Public Health and Environment
Hazardous Material and Waste Management Division
Attention: Mr. Doug Knappe
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

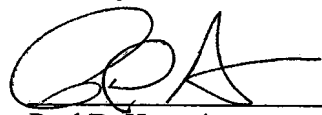
Dear Mr. Knappe:

The Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) is submitting the enclosed information to satisfy the Condition I.J.3 requirements applicable to Stage IB construction specified in the PCAPP Resource Conservation and Recovery Act (RCRA) Research, Development and Demonstration (RD&D) Permit, No. CO-04-07-01-01. Stage IB construction is complete and has been performed in compliance with the Permit and the construction drawings submitted in Modification #7 (Stage IB As-built Drawings; Chron#07-04827). Enclosed is a letter from an Independent Colorado-Registered Professional Engineer certifying this work.

For all technical matters, please contact Mr. Patrick Timm, Bechtel Pueblo Team Environmental Manager, at (719) 549-5455. For all other matters related to this document, please contact Mr. Garry Brewer of the Pueblo Chemical Depot (PCD)/Assembled Chemical Weapons Alternative (ACWA) staff at (303) 289-0230.

Sincerely,


18 DEC 2007
Christopher K. Chesney* Date
Lieutenant Colonel, U.S. Army
Commanding


12/19/07
Paul D. Henry* Date
Project Manager, Bechtel National, Inc.
Bechtel Pueblo Team Project Manager

Enclosure

Copies Furnished:

Mr. Kim Headley, Pueblo County Planning/Development, 229 West 12th Street, Pueblo, CO 81003-2810
Mr. Larry Kimmel, U.S. Environmental Protection Agency, US EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129
Mr. Gary Anderson, PCAPP, 45825 Highway 96 East, Pueblo, CO 81006-9330
PCAPP 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.

HGS Engineering, Inc.

1121 Noble Street
Anniston, Alabama 36201
Phone: 256-236-1848 • Fax: 256-236-2979
www.hgsengineeringinc.com

ENGINEERING AND PROFESSIONAL SERVICES

Kristin Harris
Subcontracting Administrator
BNI Pueblo Chemical Agent-Destruction Pilot Plant
Process Support Building
45825 Highway 96 East
Pueblo, Colorado 81006

12 December 2007

Subject: Certification of PCAPP Stage I Construction

Dear Ms. Harris:

In satisfaction of requirements found in Special Condition-3 "Commencement, Progress and Completion of the Work" of Subcontract Number 24852-HKCC-V0001, HGS Engineering, Inc. (HGS) submits the following PCAPP Stage I Construction Certification.

In compliance with PCAPP RCRA RD&D Permit Condition I.J.3., I, Harry G. Summers, an Independent, Colorado-Registered Professional Engineer, certify that the Stage IB portion of the PCAPP facility has been constructed in compliance with "Phase I Construction Plan" Attachment B of the RCRA RD&D Permit and the Phase I As-built construction drawings submitted to the Colorado Department of Public Health and Environment (CDPHE) via a Class 1 permit modification request (Chron07-04827). As per discussions and written correspondence with CDPHE and the HGS Subcontract Technical Representative, HGS Engineering agreed to make an assessment for certification of CDPHE permitted PCAPP Stage I construction activities based on the criteria in the enclosed Stage IB Construction Certification Matrices. The areas of construction evaluated for this certification are as follows:

- Clearing and Grubbing
- Rough Grading and Compaction
- Storm Water Sewer System
- Natural Gas Lines, Underground Electrical Ductbanks, High-Mast Lighting, Perimeter Fencing
- Potable Water Lines, Fire Water Lines
- Sanitary Sewer System

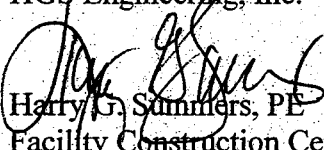
BB

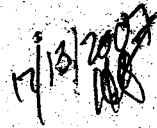
Each certification metric will have a document folder that will be kept on-site. Each folder will contain all of the documentation necessary to verify satisfactory execution of its respective metric, as well as a brief description of HGS' approach to certify the metric.

This certification does not include Metric numbers 2.6, 5.6 and 5.7 (BRS footprint sub grade testing, fire water line hydro pressure testing and fire hydrant flow rate testing, respectively). As previously discussed, these metrics will be deferred to and certified at Stage II construction certification.

I certify under penalty of law that 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 or persons 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.

HGS Engineering, Inc.


Harry G. Summers, PE
Facility Construction Certification Engineer
Colorado Professional Engineer #37873
Expiration 08/31/2009



PHASE I CONSTRUCTION PLAN CERTIFICATION MATRICES

Permit Attachment B Item #1 - Clearing and grubbing as necessary to support construction of the PCAPP facility.

CERTIFICATION ITEM NO..	REQUIREMENT	PERMIT REFERENCE DOCUMENTS	STANDARD DOCUMENT NUMBER OF DOCUMENT(S) USED IN CERTIFICATION	HGS REVIEWER, REVIEW DATE, AND INITIALS
1.1	<u>Clearing and Grubbing</u> : Clear by felling, cutting up, and disposing - trees, down timber, snags, piles, brush, heavy growth grass, weeds, rubbish, and other objectionable vegetation growth	24852-RD-3PS-000-C0007, Section 5.2	1.1	R. Turner RT

Permit Attachment B Item #2 - Grading and backfill of the PCAPP Site as described on the "Rough Grading Plan," Drawings 24852-RD-CG-Y-C0010 through C0015 of this Attachment and in accordance with the Site Grading Drawings and the Engineering Specification for Earthwork specified in Permit Condition 1.1.6. As depicted in drawings 24852-RD-CG-Y-C0010 through C0015, the final rough grade for the PCAPP Site will slope at approximately 0.3 percent from approximately El. 4,751 feet in the northwest corner of the plant area to approximately El. 4,740 feet in the southeast corner. Soils used for site grading must be sufficiently strong and incompressible to support the PCAPP foundation loading using shallow foundations consisting of spread footings with design bearing pressures in the range of 2000 to 3000 pounds per square foot. Soils used for site grading must be compacted to a density of at least 90 percent of maximum density in accordance with ASTM D-1557 (Modified Proctor) and within +/- 3 percent of optimum moisture. All backfill beneath structures must be compacted to a minimum of 95 percent of the maximum density in accordance with ASTM D-1557 (Modified Proctor).

CERTIFICATION ITEM NO..	REQUIREMENT	PERMIT REFERENCE DOCUMENTS	STANDARD DOCUMENT NUMBER OF DOCUMENT(S) USED IN CERTIFICATION	HGS REVIEWER, REVIEW DATE, AND INITIALS
2.1	<u>Rough Grading</u> : Construct perimeter ditch in accordance with ditch schedule on 24852-RD-CG-Y-C0013	24852-RD-CG-Y-C00(12 through 15)	2.1	R. Turner RT
2.2	<u>Rough Grading</u> : Excavate and backfill LAB/MPB footprint at specified data points. Structural backfill must have a Plasticity Index less than 12 and a Liquid Limit less than 35, and be compacted to at least 95% maximum density in accordance with ASTM-D-1557 and within ±3% optimum moisture and tested every 100 linear feet of foundation wall length with a minimum of 2 tests and tested once for every 2500 square feet of building slab.	24852-RD-CG-Y-C0011	2.2	R. Turner RT
2.3	<u>Rough Grading</u> : Excavate and backfill CSB/APB footprint at specified data points. Structural backfill must have a Plasticity Index less than 12 and a Liquid Limit less than 35, and be compacted to at least 95% maximum density in accordance with ASTM-D-1557 and within ±3% optimum moisture and tested every 100 linear feet of foundation wall length with a minimum of 2 tests and tested once for every 2500 square feet of building slab.	24852-RD-CG-Y-C0011	2.3	R. Turner RT
2.4	<u>Rough Grading</u> : Excavate and backfill ECF footprint at specified data points. Structural backfill must have a Plasticity Index less than 12 and a Liquid Limit less than 35, and be compacted to at least 95% maximum density in accordance with ASTM-D-1557 and within ±3% optimum moisture and tested every 100 linear feet of foundation wall length with a minimum of 2 tests and tested once for every 2500 square feet of building slab.	24852-RD-CG-Y-C0011	2.4	R. Turner RT
2.5	<u>Rough Grading</u> : Excavate and backfill ERB footprint at specified data points. Structural backfill must have a Plasticity Index less than 12 and a Liquid Limit less than 35, and be compacted to at least 95% maximum density in accordance with ASTM-D-1557 and within ±3% optimum moisture and tested every 100 linear feet of foundation wall length with a minimum of 2 tests and tested once for every 2500 square feet of building slab.	24852-RD-CG-Y-C0012	2.5	R. Turner RT
2.6	<u>Rough Grading</u> : Excavate and backfill BRS footprint at specified data points. Structural backfill must have a Plasticity Index less than 12 and a Liquid Limit less than 35, and be compacted to at least 95% maximum density in accordance with ASTM-D-1557 and within ±3% optimum moisture and tested every 100 linear feet of foundation wall length with a minimum of 2 tests and tested once for every 2500 square feet of building slab.	24852-RD-CG-Y-C00(13 & 14)	2.6	R. Turner RT
2.7	<u>Rough Grading</u> : Excavate and backfill BEB footprint at specified data points. Structural backfill must have a Plasticity Index less than 12 and a Liquid Limit less than 35, and be compacted to at least 95% maximum density in accordance with ASTM-D-1557 and within ±3% optimum moisture and tested every 100 linear feet of foundation wall length with a minimum of 2 tests and tested once for every 2500 square feet of building slab.	24852-RD-CG-Y-C0014	2.7	R. Turner RT
2.8	<u>Rough Grading</u> : Excavate storm water detention basin at specified data points	24852-RD-CG-Y-C00(11 & 14)	2.8	R. Turner RT
2.9	<u>Rough Grading</u> : Site slopes at approximately 0.3% from approximately EL. 4751 at NW corner to approximately EL. 4740 at SE corner	Permit Attachment B Item #2	2.9	R. Turner RT
2.10	<u>Rough Grading</u> : Soils used for site grading must be sufficiently strong and incompressible to support the PCAPP foundation loading using shallow foundations consisting of spread footings with design bearing pressures in the range of 2000 and 3000 pounds per square foot.	Permit Attachment B Item #2	2.10	R. Turner RT
2.11	<u>Rough Grading</u> : Soils in common fill areas must have a Plastic Index less than 25 and a Liquid Limit less than 35, and be compacted to at least 90% maximum density in accordance with ASTM-D-1557 and within ±3% optimum moisture and tested every 2000 square yards.	Permit Attachment B Item #2 / 24852-RD-3PS-000-C0007 Sections 4.1, 5.7, 6.3.1	2.11	R. Turner RT
2.12	<u>Rough Grading</u> : Elevation and Compaction Measurement and Testing Equipment used for RCRA compliance will be under control of a documented calibration program.	24852-GQP-GAQ-00001 Section 15.0	2.12	R. Turner RT

Permit Attachment B Item #3 - For construction of the PCAPP storm water drainage system, the associated storm water basin will be constructed as depicted on Drawing 24852-RD-CO-Y-C0010 of this attachment. The storm water drainage system will include the construction of storm drain pipes, catch basins, manholes, and culverts as described on the "Storm Sewer Plan", Drawing 24852-RD-CD-Y-C0010 of this Attachment.

CERTIFICATION ITEM NO.	REQUIREMENT	PERMIT REFERENCE DOCUMENTS	STANDARD DOCUMENT NUMBER OF DOCUMENT(S) USED IN CERTIFICATION	HGS REVIEWER, REVIEW DATE, AND INITIALS
3.1	Storm Sewer System: Construct four specified diameter pipe inlets into basin in accordance with basin schedule on 24852-RD-CD-Y-C0010	24852-RD-CD-Y-C0010	3.1	R. Turner RJ
3.2	Storm Sewer System: Install storm drain manholes, storm drain catch basins, and specified diameter RCP storm drain pipes at specified locations in accordance with manhole schedule on 24852-RD-CD-Y-C0010	24852-RD-CD-Y-C0010	3.2	R. Turner RJ
3.3	Storm Sewer System: Construct one controlled basin outlet and one emergency spillway basin outlet. Both outlets drain into perimeter ditch.	24852-RD-CD-Y-C0010	3.3	R. Turner RJ
3.4	Storm Sewer System: Concrete pipe supplier is NPCA certified	24852-RD-3PS-000-C0013, Section 4.1.1	3.4	R. Turner RJ

Permit Attachment B Item #4 - Construction and installation of underground electrical and natural gas lines and hi-mast lighting and fencing.

CERTIFICATION ITEM NO.	REQUIREMENT	PERMIT REFERENCE DOCUMENTS	STANDARD DOCUMENT NUMBER OF DOCUMENT(S) USED IN CERTIFICATION	HGS REVIEWER, REVIEW DATE, AND INITIALS
4.1	Natural Gas: Piping manufacturer's testing reports (MTRs) and manufacturer certifications submitted prior to pipe placement	24852-RD-3PS-000-C0010 Sections 6.1.1, 6.2	4.1	R. Turner RJ
4.2	Natural Gas: All high-density polyethylene (HDPE) pipe from same manufacturer and conforms to NFPA 54	24852-RD-3PS-000-C0010 Sections 4, 4.1	4.2	R. Turner RJ
4.3	Natural Gas: Detectable metallic 3" wide yellow marking tape stating "Caution- natural gas piping buried below" placed 12" below finish grade directly over pipe with printed side up.	24852-RD-3PS-000-C0010 Sections 4.4, 5.1.1	4.3	R. Turner RJ
4.4	Natural Gas: 8-hour pressure test pipe in accordance with NFPA 54	24852-RD-3PS-000-C0010 Sections 6.3.2	4.4	R. Turner RJ
4.5	Underground Electrical: Warning tape installed above conduit approximately 12" below finish grade	24852-FSR-ERGO-00001 Exhibit D, Item #7	4.5	R. Turner RJ
4.6	Underground Electrical: Where crossing roadways, underground duct banks shall be steel reinforced per detail 3 of drawing 24852-RD-E9-E00-E0004.	24852-RD-3PS-000-E0035 Section 3.5.2	4.6	R. Turner RJ

Permit Attachment B Item #5 - Construction and installation of underground potable water and fire water lines, and fire hydrants as described on the "Underground Utilities Key Plan," Drawing 24852-RD-CO-Y-C0010 of this Attachment.

CERTIFICATION ITEM NO.	REQUIREMENT	PERMIT REFERENCE DOCUMENTS	STANDARD DOCUMENT NUMBER OF DOCUMENT(S) USED IN CERTIFICATION	HGS REVIEWER, REVIEW DATE, AND INITIALS
5.1	Potable Water Lines: Piping manufacturer's testing reports (MTRs) and manufacturer certifications submitted prior to pipe placement	24852-RD-3PS-000-C0008 Section 9	5.1	R. Turner RJ
5.2	Potable Water Lines: Detectable 6" wide blue marking tape stating "Caution- water line buried below" placed approximately 12" below finish grade directly over pipe with printed wastewater lines where crossing is required.	24852-RD-3PS-000-C0008 Section 4.3	5.2	R. Turner RJ
5.3	Potable Water Lines: Perform hydrostatic leak tests in accordance with manufacturer's recommendation.	24852-RD-3PS-000-C0008 Sections 5.3.1, 5.3.2	5.3	R. Turner RJ
5.4	Fire Water Lines: Piping manufacturer's testing reports (MTRs) and manufacturer certifications submitted prior to pipe placement	24852-RD-3PS-000-M0054 Section 3.1	5.4	R. Turner RJ
5.5	Fire Water Lines: Piping flushed and 2-hour hydro tested at 200 psi in accordance with NFPA 24	24852-RD-3PS-000-M0054 Sections 6.3, 6.3.1	5.5	R. Turner RJ
5.6	Fire Hydrants: Hydrant flow tested in accordance with NFPA 291	24852-RD-3PS-000-M0054 Section 6.3.2	5.6	R. Turner RJ
5.7	Fire Hydrants: Must have a designed flow rate of 750 gpm.	Permit Attachment B Item #5	5.7	R. Turner RJ
5.8			5.8	R. Turner RJ

Stage 1B FCC Matrices - Rev 01

Permit Attachment B Item #6 - Construction and installation of underground sanitary sewer lines, sanitary sewer manholes, and sanitary sewer cleanout ports as described on the "Underground Utilities Key Plan," Drawing 24852-RD-CO-Y-C0010 of this Attachment. Fire water lines must be capable of providing adequate volume and pressure for fire suppression capabilities in PCAPP. Yard hydrants must have a designed flow rate of 750-gpm.

CERTIFICATION ITEM NO.	REQUIREMENT	PERMIT REFERENCE DOCUMENTS	STANDARD DOCUMENT NUMBER OF DOCUMENT(S) USED IN CERTIFICATION	HGS REVIEWER, REVIEW DATE, AND INITIALS
6.1	Sanitary Sewer System: Piping manufacturer's testing reports (MTRs) and manufacturer certifications submitted prior to pipe placement	24852-RD-3PS-000-C0009 Section 9	6.1	R. Turner
6.2	Sanitary Sewer System: Detectable 6" wide green marking tape stating "Sewer line below" placed 6-8" below finish grade directly over pipe with printed side up.	24852-RD-3PS-000-C0009 Sections 4.4, 5.8	6.2	R. Turner
6.3	Sanitary Sewer System: Submersible pumps designed for pumping raw, unscreened, domestic sanitary sewage and suitable for solids handling	24852-RD-3PS-000-C0009 Section 4.3.2	6.3	R. Turner
6.4	Sanitary Sewer System: PVC piping shall be piping class USS in accordance with 24852-3PS-000-P0001	24852-RD-3PS-000-C0009 Section 4	6.4	R. Turner
6.5	Sanitary Sewer System: Perform leakage and deflection tests of piping	24852-RD-3PS-000-C0009 Section 6.1, 6.2	6.5	R. Turner

RS
RS
RS
RS
RS

CHEM DEMIL

Notice of Inspection

Facility Name PCAPP - PSB		EPA I.D.# C08213820725	Date 01-23-2008
Street 45825 HWY 96 EAST		Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Hour In: 14:00
City Pueblo	County Pueblo	Zip 81006	Hour Out: 15:35
Facility Representatives PAT TIMM		Enter By: <input checked="" type="checkbox"/> Consent <input type="checkbox"/> Warrant	Agency: <input checked="" type="checkbox"/> State <input type="checkbox"/> Oversight <input type="checkbox"/> Joint
Titles Environmental Manager PCAPP		Telephone #	

CURRENT NOTIFICATION(S) LQG, SQG, Exempt, LDF, TSF, Transporter, Non-Notifier, Transfer facility or Other
To Change Status; Facility must send Letter or Revised Notification.

Comments: Reviewed and spot-checked STAGE 1B FCC MATRICES w/ Verification documentation as provided by Ray Turner (HGS Engineering).
 FINDINGS: Spot checked ITEMS 2.3, 2.5, 2.10, 2.12, 3.1, 3.4, 4.3, 5.5, 5.6, 5.7, 5.8 & 6.5 of Stage 1B Matrices. All items were complete w/ the exception of the following: Items 5.6 & 5.7 (Fire line testing) will be completed during Stage II Certification; Item 5.8 Need to provide details regarding head loss calculations utilized to determine Flow rate of piping. (Need additional information on head loss determination).

Assistance Delivered During Inspection (for internal use - check ALL that apply):

Compliance Assistance: <input type="checkbox"/> Generator Handbook <input type="checkbox"/> Field Assistance <input type="checkbox"/> Other guidance documents <input type="checkbox"/> Referral to another program <input type="checkbox"/> Change in generator status <input type="checkbox"/> downward <input type="checkbox"/> upward	Pollution Prevention: <input type="checkbox"/> Guidance/Referral <input type="checkbox"/> Field Assistance	Current Waste Minimization: <input type="checkbox"/> Product Substitution <input type="checkbox"/> Distillation of solvents on site <input type="checkbox"/> Elementary Neutralization <input type="checkbox"/> Other
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Samples, Documents, Plans, and/or Photos Collected	3.
1. None Requested - N/R	N/R
2. N/R	N/R

State personnel will review the facts established by this inspection. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged <div style="font-size: 2em; font-family: cursive;">Pat Timm</div> 23 JAN 08 Signature of Facility Representative	Lead Inspector: KEVIN MACKAY Assisting Inspector(s) and Multimedia Participant(s) James Hindman <div style="font-size: 3em; font-family: cursive;">P</div>
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NOTICE OF INSPECTION

TYPE OF EVALUATION - Check all that apply

<input type="checkbox"/> CEI Compliance Evaluation Inspection <input type="checkbox"/> CAC Corrective Action Inspection <input type="checkbox"/> OAM Operation & Maintenance <input type="checkbox"/> CDI Case Development Inspection <input type="checkbox"/> CSE Compliance Schedule Evaluation <input type="checkbox"/> SNN No Longer a Significant Non-Complier <input type="checkbox"/> SNY Significant Non-Complier <input checked="" type="checkbox"/> FCI Focused Compliance Inspection (must select evaluation type(s) below) <input checked="" type="checkbox"/> CEP-Compliance Evaluation Partial <input type="checkbox"/> CRR-Corrective Action Record Review <input type="checkbox"/> ERP-Enforcement Follow-up Review	<input type="checkbox"/> CAR Corrective Action Oversight <input type="checkbox"/> GME Groundwater Monitoring Evaluation <input type="checkbox"/> FRR Financial Record Review <input type="checkbox"/> FSD Facility Self Disclosure <input type="checkbox"/> CAV Compliance Assistance Visit <input type="checkbox"/> NRR Non-Financial Record Review <input type="checkbox"/> FUI Follow Up Inspection _____ (Insp Date) <input type="checkbox"/> ERP - Inspection _____ (Sector) <input type="checkbox"/> UOI-Used Oil Inspection <input type="checkbox"/> UWR-Universal Waste Inspection
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REASON FOR INSPECTION - (Multiple may be checked for each evaluation)

<input type="checkbox"/> Citizen Compliant <input type="checkbox"/> Sampling	<input type="checkbox"/> Multi-Media _____ (Agency) <input type="checkbox"/> 3007 Request _____ (Issued Date)
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COVERAGE AREAS - Complete for all areas evaluated. Enter the following violation determination codes identified at the time of inspection. Y = Yes (evaluated with violation), N = No (evaluated; no violation).

GENERATOR REQUIREMENTS	TSD REQUIREMENTS
<p>GENERAL REQUIREMENTS</p> <input type="checkbox"/> GRA 262.11 Haz Waste Determination <input type="checkbox"/> GRB 262.12 EPA ID numbers <input type="checkbox"/> GRC 262.13 Generator Fees	<input type="checkbox"/> DGS General <input type="checkbox"/> DGW Groundwater <input type="checkbox"/> DPB Part B Application <input type="checkbox"/> DMR Manifest <input type="checkbox"/> DCP Contingency <input type="checkbox"/> DPP Preparedness/Prev <input type="checkbox"/> DFR Financial <input type="checkbox"/> DCL Closure/Post Clos <input type="checkbox"/> DLB Land Ban <input type="checkbox"/> DCH Chem/Phys/Bio <input type="checkbox"/> DLF Landfill <input type="checkbox"/> DLT Land Treatment <input type="checkbox"/> DSI Surface Impndmt <input type="checkbox"/> DWP Waste Pile <input type="checkbox"/> DIN Incinerator <input type="checkbox"/> DTR Tank <input type="checkbox"/> DMC Containers <input type="checkbox"/> DTT Thermal Trtmt <input type="checkbox"/> DID Illegal Disposal <input type="checkbox"/> DIS Illegal Storage <input type="checkbox"/> DIT Illegal Treatment <input checked="" type="checkbox"/> DPR Permit <input type="checkbox"/> DOR Other _____
<p>PRE-TRANSPORT REQUIREMENTS (cont)</p> <input type="checkbox"/> PTO 262.34.c & g Satellite Accumulation <input type="checkbox"/> PTP 262.34.d.5 SQG Emerg Prep <input type="checkbox"/> PTQ 262.34.d.5.iii SQG training <input type="checkbox"/> PTR 262.34 Other § _____	<p>RECORDKEEPING REQUIREMENTS</p> <input type="checkbox"/> RRA 262.40 Recordkeeping <input type="checkbox"/> RRB 262.41 Biennial Reporting
<p>MANIFEST REQUIREMENTS</p> <input type="checkbox"/> MRA 262.20 General Rqmts <input type="checkbox"/> MRB 262.22 Number of copies <input type="checkbox"/> MRC 262.23 Use of the Manifest	<p>CESQG REQUIREMENTS</p> <input type="checkbox"/> CEG 261.5 CESQG Rqmts
<p>PRE-TRANSPORT REQUIREMENTS</p> <input type="checkbox"/> PTA 262.30 Packaging <input type="checkbox"/> PTB 262.31 PUC/DOT Labeling <input type="checkbox"/> PTC 262.32 Marking <input type="checkbox"/> PTD 262.33 Placarding <input type="checkbox"/> PTE 262.34.a.1 Accumulation time <input type="checkbox"/> PTS 262.34.a.1.i Inspections (weekly/daily) <input type="checkbox"/> PTF 262.34.a.1.i Condition of containers <input type="checkbox"/> PTG 262.34.a.1.i Open containers <input type="checkbox"/> PTH 262.34.a.1.i Incompatible wastes <input type="checkbox"/> PTI 262.34.a.1.ii Tank Mgmt <input type="checkbox"/> PTJ 262.34.a.2,3 Container Labeling <input type="checkbox"/> PTK 262.34.a.4 Preparedness & Prevention <input type="checkbox"/> PTL 262.34.a.4 Contingency Plan <input type="checkbox"/> PTM 262.34.a.4 Training <input type="checkbox"/> PTN 262.34.a.4 Waste Analysis Plan	<p>USED OIL REQUIREMENTS</p> <input type="checkbox"/> OIL 279 Used Oil Req.
<p>OTHER GENERATOR RQMTS</p> <input type="checkbox"/> GOR Other Generator Rqmts § _____	<p>LAND BAN REQUIREMENTS</p> <input type="checkbox"/> GLB 268 Land Ban Rqmts
<p>AIR EMISSION STANDARDS</p> <input type="checkbox"/> AEA 264/5 1030-49--- Subpart AA <input type="checkbox"/> AEB 264/5 1050-79--- Subpart BB <input type="checkbox"/> AEC 264/5 1080-99--- Subpart CC	<p>OTHER REQUIREMENTS</p> <input type="checkbox"/> FEA Formal Enforcement Agreement <input type="checkbox"/> CAS Corrective Action Schedule <input type="checkbox"/> CSS Compliance Schedule <input type="checkbox"/> UWR Universal Waste Requirements

TRANSPORTER REQUIREMENTS

<input type="checkbox"/> TGR General <input type="checkbox"/> TMR Manifest <input type="checkbox"/> TWD Discharge/Spill <input type="checkbox"/> TOR Other _____ <input type="checkbox"/> TTR Transfer
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OTHER REQUIREMENTS

<input type="checkbox"/> FEA Formal Enforcement Agreement <input type="checkbox"/> CAS Corrective Action Schedule <input type="checkbox"/> CSS Compliance Schedule <input type="checkbox"/> UWR Universal Waste Requirements

Pueblo Chemical Depot
Fire and Emergency Services

July 13, 2006

Hydrant Flow Results for newly installed water line and 3 hydrants at PSB
Residual pressure remained above 20 PSI.

Hydrant	Pitot Reading	Initial Pressure/ Gauge on hydrant	Open Hydrant prior to Fire pump run	Open hydrant with fire pump running	GPM W/O Fire pump	GPM With Fire Pump Running
1 South PSB		90	26	144	686	1789
2 East PSB		90	26	144	686	1789
3 North PSB	20				686	1789

Formula used to calculate Flow

$GPM = (29.83) \times \text{Coefficient } (.8) \times \text{Dia Squared} \times \text{Square Rt Pressure}$

Hydrants will be color code Blue

Jim Richardson
Fire Protection Inspector