
PUBLIC PARTICIPATION PLAN
U. S. ARMY PUEBLO CHEMICAL DEPOT PROGRAMS
PUEBLO, COLORADO
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1. INTRODUCTION

The purpose of this Public Participation Plan update is to: 1. assess communication needs of the communities adjacent to the U.S. Army Pueblo Chemical Depot; 2. evaluate the effectiveness of the communication methods currently in place for the various programs at the depot; and 3. determine where efforts can and should be improved to maximize interaction with the community. The depot programs participating in this update include chemical demilitarization, environmental restoration and base reuse. Although the Chemical Stockpile Emergency Preparedness Program did not participate in this process, it was brought up by interviewees. Usually, interviewees discussed the availability or operation of tone alert radios, broadcast announcements and community loud speakers.

This document outlines specific public participation strategies for addressing these goals and for maintaining the Public Participation Plan as a flexible, “living” document that can adapt to evolving community needs and concerns. This is a qualitative assessment of community involvement activities, not quantitative, due to the subjective nature of the methods of collecting information – interviews vs. surveys. The Public Participation Plan identifies activities to be carried out to facilitate two-way communication between the parties responsible for the depot programs and communities surrounding the depot. The plan’s objectives and activities form a comprehensive community relations strategy. This document is consistent with the Environmental Protection Agency guidance document *Resource Conservation and Recovery Act Public Involvement: A Handbook, 1996*.

Community interviews for this update were conducted in April 2015. The in-person interviews were conducted at locations in the communities of Avondale, Boone and Pueblo. In addition to citizens, interviews were conducted with employees at Pueblo Chemical Depot.

Representatives from the Colorado Department of Public Health and Environment; Pueblo City-County Health Department; Bechtel National, Inc.; Program Executive Office, Assembled Chemical Weapons Alternatives; U.S. Army Pueblo Chemical Depot; Pueblo Chemical Stockpile Outreach Office; and the Chemical Demilitarization Citizens’ Advisory Commission conducted the interviews.

Agencies and Organizations Responsible for Implementation of the Plan:

- 1. Colorado Department of Public Health and Environment** This state agency has regulatory authority to enforce the federal Resource Conservation and Recovery Act in the state of Colorado, and the Colorado Hazardous Waste Regulations.

2. U.S. Army Pueblo Chemical Depot The depot's current mission is: Safely secure, store, and monitor the chemical weapons stockpile while protecting workforce, public, and environment; support stockpile elimination; and transition the depot and the workforce for closure. On-going activities that support the depot's mission include the environmental restoration of contamination resulting from prior missions, installation reuse, support of chemical munitions destruction, and the Chemical Stockpile Emergency Preparedness Program (CSEPP). The depot has several permitted igloos used to store problem munitions and other agent-contaminated materials. In coordination with Program Executive Office, Assembled Chemical Weapons Alternatives the facility concluded destruction of these weapons in the first campaign for the Explosive Destruction System (EDS) in February 2016. The EDS will be used again when the main plant commences operations and throughout plant operations for problem munitions that cannot be processed through the Pueblo Chemical Agent-Destruction Pilot Plant. The EDS will be used to treat material generated from agent-contaminated areas of the depot as restoration continues.

3. U.S. Army Chemical Materials Activity The Pueblo Chemical Depot commander reports to the Chemical Materials Activity, headquartered at Aberdeen Proving Ground, Maryland. The Army's Chemical Materials Activity is responsible for the storage of chemical weapons at Pueblo, Colorado and the Blue Grass Army Depot in Kentucky, and supports the destruction mission of chemical weapons stockpiles at both sites.

4. Program Executive Office, Assembled Chemical Weapons Alternatives This Department of Defense agency headquartered at Aberdeen Proving Ground, Maryland is responsible for project management to destroy the depot's chemical weapons stockpile. The Program Executive Office, Assembled Chemical Weapons Alternatives is responsible for oversight of the systems contract with Bechtel National, Inc.

5. Bechtel National, Inc. Bechtel National, Inc. leads a team of subcontractors known as Bechtel Pueblo Team, which designed, built, is systemizing, and will operate and close the facility known as the Pueblo Chemical Agent-Destruction Pilot Plant. Bechtel National, Inc. was awarded the systems contract in September 2002.

One additional organization not responsible for implementation of this Public Participation Plan but is nonetheless heavily engaged in community involvement and support activities specific to the Pueblo Chemical Depot is PuebloPlex. Pueblo Depot Activity Development Authority was created by the Colorado legislature in 1994 following the depot's realignment for eventual closure in 1988 by Congress pursuant to the first Base Realignment and Closure Act. A provision of the Act enables local communities to create a Local Reuse Authority for each realigned and/or closed military facility to address transition of the property back to the community. Pueblo Depot Activity Development Authority was renamed PuebloPlex to reflect future use of the property. PuebloPlex currently leases to the public warehouse space, railroad track, approximately 250 igloos and 11 buildings. There are many other areas targeted for reuse or redevelopment, and plans already approved with goals of using the facilities and space on the site after closure to create up to 58,000 new jobs over the next 100 years. PuebloPlex, the Local Reuse Authority, has updated the reuse plan for the site and is working closely with the Army to transfer some of the property to PuebloPlex as early as December 2016. The Plan is posted to the internet at <http://puebloplexredevelopmentplan.com/>. Please see Figure 1 for the Redevelopment Plan Map.

While the goals and objectives of each of these programs overlap with regard to community involvement, historically they have operated separately largely due to the various reporting and funding channels of each mission and the requirements of different regulating authorities and statutes. Pueblo Chemical Depot community involvement efforts have merged with the advent of three monumental actions: destruction of stored problem munitions in the Explosive Destruction System; the U.S. Army excessing 70% of the depot's 22,000 acres; and start of chemical weapons stockpile destruction very clearly on the horizon. For the first time in depot history, all of the programs at the depot are moving at a similar pace and toward closure.

The Public Participation Plan presents the programmatic community involvement objectives and strategies to promote public awareness regarding all of the programs at the depot. Decisions about public participation and involvement efforts are based on public input collected through community interviews, response cards, public comments and other means.

2. SITE DESCRIPTION

The Pueblo Chemical Depot is a U.S. Army facility that began operations in southeastern Colorado in 1942. Its principal mission was the receipt, storage, issuance, maintenance, and disposal of general supplies of conventional and chemical munitions. The depot's current mission is to safely

secure, store, and monitor the chemical weapons stockpile while protecting the workforce, the public, and the environment; support stockpile elimination; and transition the depot and the workforce for closure. The depot currently stores approximately 2,600 tons of mustard chemical agent in assembled munitions, less than 10% of the nation's original stockpile. The munitions are 105-millimeter (mm) and 155-mm projectiles, and 4.2-inch mortar cartridges. The weapons are stored in earth-covered igloos on the depot, adjacent to the Pueblo Chemical Agent-Destruction Pilot Plant. This chemical weapons destruction facility that has been constructed and is currently undergoing final systemization in preparation for a pilot test in mid-2016. Facility construction began in 2005. Current schedule milestones anticipate chemical weapons destruction to begin in early 2017 with completion by the end of 2019. Destruction of stored problematic munitions began in October 2014 using the Explosive Destruction System; this campaign was completed in March 2016 and the system was taken off-line.

The depot is owned by the U.S. Army and is under the operating authority of the U.S. Army Chemical Materials Activity. Historically, the depot generated, treated, stored and disposed of hazardous and solid wastes on site. Waste generated at the facility included, but was not limited to military explosives compounds and solvents, etc. These sites are being investigated and remediated by the U.S. Army Base Realignment and Closure environmental restoration program. The U.S. Army declared approximately 16,000 acres of depot property releasable to the local community in 2013 after a formal process to determine that no other federal agencies wanted the property. PuebloPlex, the Local Reuse Authority, has updated the reuse plan for the site and is working closely with the Army to transfer some of the property to PuebloPlex as early as December 2016.

3. PHYSICAL DESCRIPTION

Pueblo Chemical Depot is located in southeastern Colorado, east of Pueblo and north of the Arkansas River in Pueblo County (**Figure 2**). The depot includes more than 23,000 acres of prairie land with a variety of buildings and other structures, as well as open and undeveloped areas.

Directly south of the depot is the predominantly agricultural community of North Avondale, with approximately 30 homes. The town of Avondale is a few miles south of the depot. The town of Boone is located east-southeast of the depot, and is the only incorporated town of the three.

The land immediately surrounding the depot primarily consists of undeveloped grazing and rangelands and scattered ranches. This area has been zoned for grazing and other agricultural uses with minimum lot sizes of 40 acres. The nearest home is located approximately 0.75 mile north of the depot boundary. To the south of the depot, some light commercial and residential zoning exists along

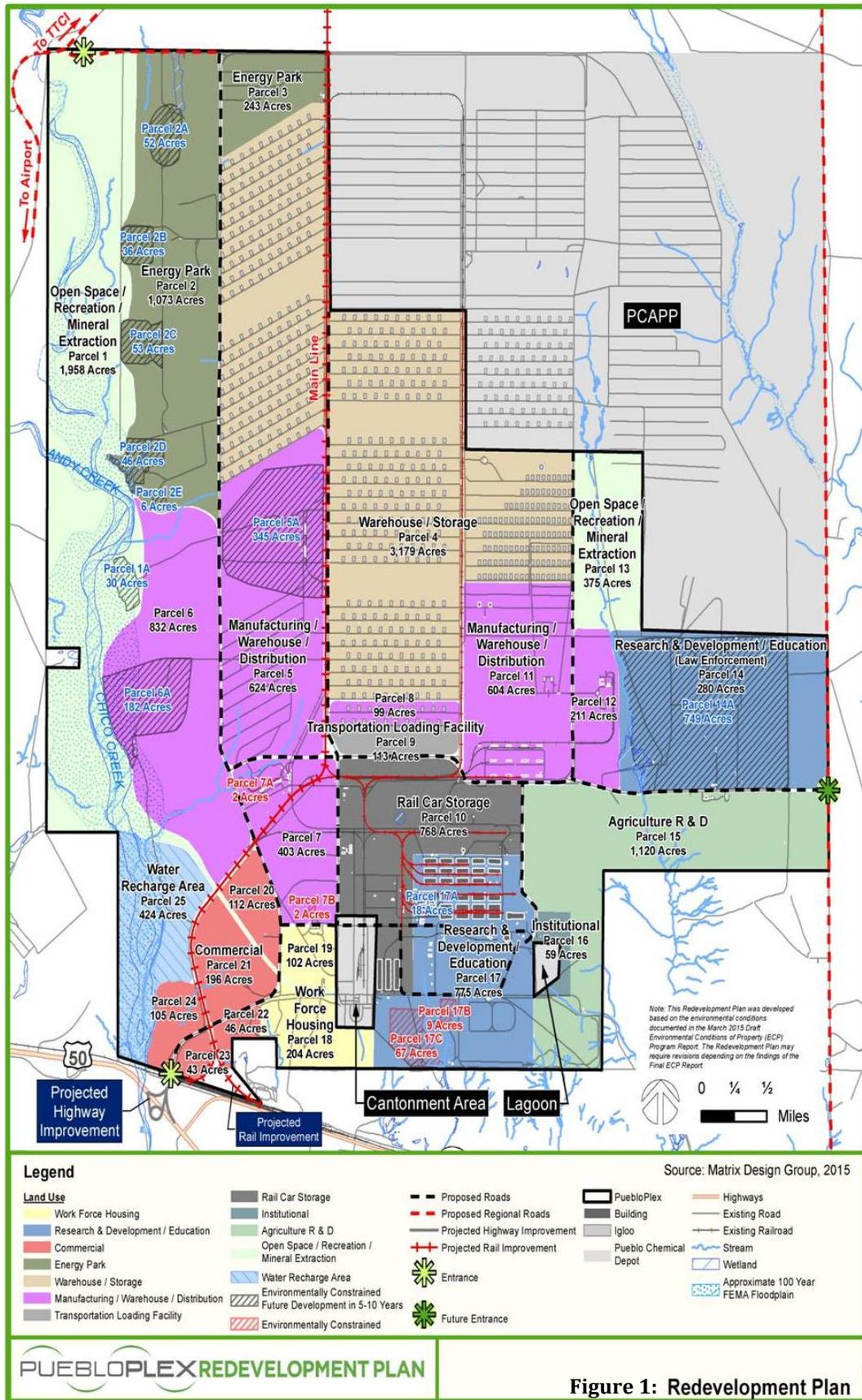


Figure 1: Redevelopment Plan

the Arkansas River near the towns of Boone, North Avondale, and Avondale. The projected surrounding land use continues to be agricultural; however, residential use is projected to increase in the area south of the Arkansas River.

State Highway 96, a four-lane road, intersects Interstate 25 in Pueblo to the west and provides access to the depot. Along the western and northern borders of the depot is the Transportation Technology Center, Inc. access road. This road was improved with Defense Access Road funds to create northwest access to the depot chemical weapons destruction facility. Several unimproved dirt roads are also present around the periphery of the depot. The perimeter of the depot property is fenced.

The Southern Industrial Area contains Pueblo Chemical Depot office buildings and maintenance shops. A system of approximately 170 miles of interior roads, mostly paved, and 46 rail miles with major rail connectivity is maintained at the depot.

4. LOCAL HISTORY

The depot location was selected in 1941 when national defense was accelerated prior to the United States entry into World War II. The land was acquired in 1941 and 1942 under the First War Powers Act of 1941 and Executive Order 9001, dated December 27, 1941.

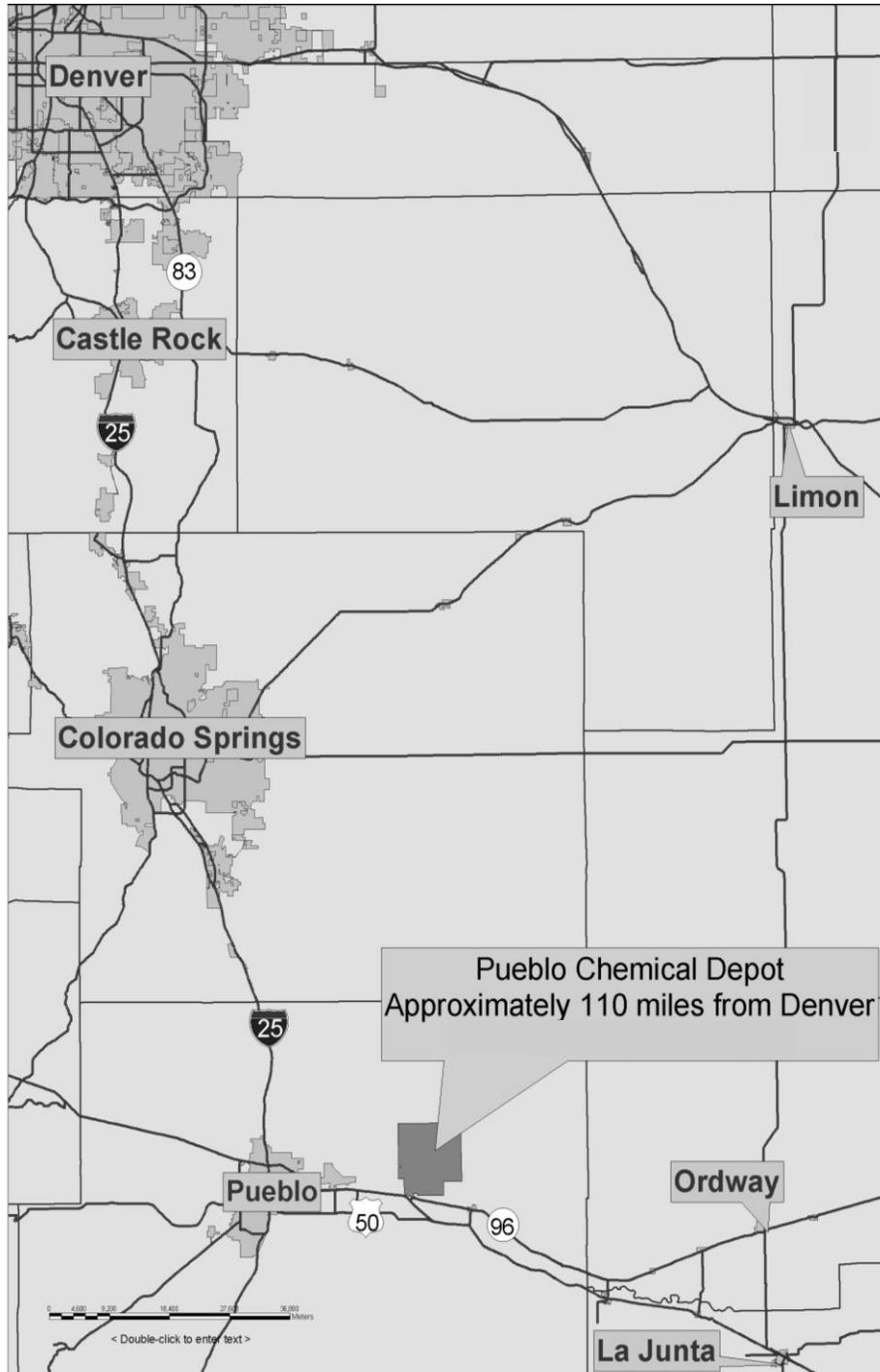
Industry and government facilities have played a large part in the development of the Pueblo area. Evraz Rocky Mountain Steel Mills, formerly Colorado Fuel and Iron Company, was founded in 1872. There were also five historic smelting facilities in the area around the turn of the 20th century. Defense industry buildup, sparked by World War II, stimulated the local economy in the 1940s. Major government facilities in the Pueblo area include the depot, the U.S. Government Printing Office, the Bureau of Documents Distribution Center and the Bureau of Reclamation's Frying Pan-Arkansas Water Reclamation and Recreation Project.

5. DEMOGRAPHICS

The depot is located in Pueblo County. The county had an estimated population of 159,063 residents in 2010, while the city of Pueblo had an estimated population of 106,595. The remainder of the county population is dispersed throughout the county, other small communities, or on farms or ranches. Three small communities are located south of the depot: Boone (population 339 in 2010), North Avondale and Avondale (estimated census 2015 population of 672).

There are no residents living in the housing at the depot; many of the residential buildings are or will be demolished due to their outdated condition. As of April 2016, there are approximately 170

tenants leasing various parts of the depot. Pueblo Chemical Depot currently includes 450 military and civilian employees. The chemical weapons disposal facility work force for the depot includes 1,343 as of the end of March 2016.



**Figure 2: Pueblo Chemical Depot
Pueblo, Colorado**

6. REGULATIONS

Construction, systemization, pilot testing operations and closure of Pueblo Chemical Agent-Destruction Pilot Plant must be done in accordance with the federal Resource Conservation and Recovery Act and state Hazardous Waste Regulations. To this end, the Pueblo Chemical Depot and Bechtel National, Inc. submitted an application in December 2003 to the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division, for the first phase of a hazardous waste permit to construct the plant. The Division issued a Research, Development and Demonstration Permit in July 2004, and Program Executive Office Assembled Chemical Weapons Alternatives was added as a permittee in 2008. Construction and design of PCAPP is being completed in three phases. Phase I allowed early preparation of the site and pre-construction activities. Phase II of the permit, issued July 2005, allowed the permittees to install non-agent process buildings, structures, and above ground utilities. Phase III of the permit was issued October 2008, and allowed construction of chemical agent process buildings. There have been several modifications to the permit since 2008 to incorporate further design changes and include more plant features – such as the Biotreatment Area, Brine Concentrator Feed Tanks and Brine Reduction System. More modifications can be expected as the design of the plant moves to pilot testing, which will provide actual chemical agent process information. All information obtained from the Research, Development and Demonstration permit will serve as the basis for conditions of the ongoing operations (RCRA Part B) permit.

All phases and modifications of the Research, Development and Demonstration permit have corresponding modifications to the Pueblo County Certificate of Designation. Other permits such as surface water management and air permits are also the responsibility of the permittees.

7. PAST AND PRESENT PUBLIC PARTICIPATION

a) Past Public Participation

Community outreach activities, while consistent in number, have varied in scope since the last Public Participation Plan published in 2010.

- The Pueblo Chemical Depot quarterly Environmental Monitor is distributed both electronically and in paper form. It addresses topics pertaining to the environmental restoration program, and includes special topics such as wildlife protection and permit modifications.
- The Chemical Stockpile Outreach Office, formerly the Pueblo Chemical Depot Community Outreach Office, was established in 1997 the same year as the creation of the Assembled Chemical

Weapons Assessment program. Once technologies for chemical weapons destruction at Pueblo and Blue Grass were selected, this program was renamed. The Assembled Chemical Weapons Alternatives public affairs program has evolved and become more comprehensive in scope. Over the years, numerous informative materials have been developed in coordination with the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, the Chemical Stockpile Emergency Preparedness Program, Environmental Protection Agency Region VIII and local government. Fact sheets, brochures and the This Month at PCAPP (formerly Connect with PCAPP, Exchange) newsletter are provided to the public at the centrally located Pueblo Chemical Stockpile Outreach Office and electronic mailing list on a regular basis or as regulatory and programmatic milestones occur. A heavy emphasis on information distribution via social and electronic media has evolved consistent with the advent of these communications channels. Program videos for both Pueblo and Blue Grass, Kentucky are available on YouTube and a large selection of photographs for both programs is posted to Flickr.

An educational program was developed that takes historic information into the local K-12 school systems. The outreach program participates in numerous community events, such as the Avondale Veterans Parade and McHarg Anniversary Celebration, and provides briefings to any group in the community that requests them. The outreach program also provides information to Pueblo Chemical Depot and Pueblo Chemical Agent-Destruction Pilot Plant employees.

Public meetings continue to be held in the three unique Pueblo County communities – Boone, Avondale and Pueblo (city) – for all major regulatory milestones (see Appendix I). Although meetings for each regulatory milestone had been held in each of these communities early in the program, attendance at the meetings generally waned. Permit modification meetings have been held on the same day as the CAC's Permitting Working Group to accommodate community members who remain interested in this level of detail.

The web page maintained by the Colorado Department of Public Health and Environment contains portions of the Administrative Record for public review for both permitted activities and the Citizens' Advisory Commission. This does not include all of the Administrative Record as that would be too voluminous. Any records not contained on the web page are available by request by contacting the state health department's Public Involvement Coordinator. Information Repositories established for the depot environmental restoration program have been utilized by Bechtel National, Inc as well. Information Repository locations are listed in Appendix B.

b) Present Public Participation

b.1) Pueblo Chemical Depot commander and the Public Affairs Office The Commander and the non-commissioned officer in charge of the depot change every two years. The commander's strategic communication plan remains consistent through the change and is coordinated through the Pueblo Chemical Depot Public Affairs Office. It includes attending community meetings, including the Military Affairs Committee meeting, City Council, County Commissioners public meetings, the Citizens' Advisory Commission, and other community events as time allows. The depot commander also meets with elected officials, Pueblo County staff, FEMA Region VIII, the state health department and Colorado state stakeholders and partners. The depot Public Affairs Office coordinates the commander's or subject matter expert's participation in public meetings providing the community with updated information on the mission and the future of operations at the depot.

b.2) Colorado Chemical Demilitarization Citizens' Advisory Commission The Citizens' Advisory Commission represents community interests and provides a vital link between the Pueblo community, the military, systems contractor and regulators by providing a forum for exchanging information about chemical weapons disposal. The commission has sub-groups to study issues in more detail. These subgroups include the Permitting Working Group and the Bio-Utilization Working-Group. The Permitting Working Group and Bio-Utilization Working-Group are currently active; they consider permitting and more technical topics and then report back to the CAC. The Design Options and Public Involvement Working Groups are currently inactive, but may be activated as needed by the commission. Citizens' Advisory Commissions were created as part of the National Defense Authorization Act in 1993 for the eight states in which chemical weapons stockpiles are/were stored.

The Colorado Citizens' Advisory Commission meets with the community and representatives of the Army, the PEO Assembled Chemical Weapons Alternatives, the state of Colorado and the systems contractor at regular public meetings to discuss the demilitarization program, its impact on Colorado and the Pueblo community, and the interests of the public. The Citizens' Advisory Commission consists of nine members – seven are members of the community at-large and two are state officials. Commission members are appointed by the Governor of Colorado to serve an unlimited term at the Governor's or his successors' discretion. Although the Commission receives limited federal funding for administrative expenses from the Department of Defense, it operates independently. The Citizens' Advisory Commission has most recently had a major role in advising the Department of Defense on decisions regarding transportation of hydrolysate off-site, and on expanded use of explosive destruction technologies.

b.3) Restoration Advisory Board Pueblo Chemical Depot's Restoration Advisory Board is a citizen-based advisory group that provides input to the U.S. Army and state health department regarding the environmental restoration. The Restoration Advisory Board was formed by the Army for community-based decision-making responsive to community needs and concerns; it is also charged with the responsibility of passing information about environmental cleanup to the community. The depot provides progress reports on corrective action processes and technical support to the Restoration Advisory Board as key factors in promoting informed and valuable reviews and comments.

b.4) Pueblo Chemical Stockpile Outreach Office The outreach office was established in 1997 to provide the Pueblo community with information on chemical weapons stockpile destruction. The outreach office serves as a center for public inquiries regarding the program and provides available information or directs information requests to the depot, the state health department, Program Executive Office Assembled Chemical Weapons Alternatives or other appropriate agencies. The outreach office houses a variety of resources including technical documents, brochures and electronic media, static displays, newsletters and fact sheets as appropriate. Emphasis is placed on reaching out to the public by providing both formal presentations and informal talks in the affected communities wherever possible. The office is currently managed for the PEO Assembled Chemical Weapons Alternatives and is staffed by contract personnel.

8. COMMUNITY COMMENTS, ISSUES, AND CONCERNS

In-person community interviews were conducted to evaluate the specific concerns, priorities, and communication needs of the community. The interviews were conducted at locations chosen by the interviewees. Interviews were designed to gather appropriate information to develop a Public Participation Plan responsive to community concerns and preferences. Goals of these interviews are to evaluate community members' subjective opinions about the existing plan and to identify needed plan changes. The interview process took place throughout Pueblo County during April 2015. Interviewees included citizens, local formal and informal community leaders, environmental groups, the business community, the educational community, depot employees and elected officials.

Comments and concerns discussed in this section were identified during interviews conducted by the Colorado Department of Public Health and Environment, Pueblo County, Pueblo Chemical Depot, the Outreach Office and Bechtel Pueblo Team. The interviews were designed to:

- Collect information on community perceptions of depot programs and activities.

- Determine the community's preferred methods for receiving information about depot programs and activities.
- Determine the best way for the community to provide input to the various entities responsible for the project.

In all, three teams of a minimum of two interviewers conducted 41 in-person interviews in two days. Most people interviewed knew something about Pueblo Chemical Depot activities, although PCAPP activities were cited most frequently.

a.) Interview Response Summary

Although about half of the interviewees did not think they were more interested in some activities than others; depot activities that arose as more important to the interviewees than others included (in order of frequency):

- a. Reuse
- b. CAC meetings
- c. Safety
- d. Demilitarization
- e. Financial impact
- f. RAB and cleanup
- g. All of it.

Chemical Weapons Destruction Program

Nearly all interviewees felt that they knew something about this program. Half indicated that they have no concerns about the program. Comments ranged from having confidence in the safety and process design; personnel; and an understanding that cost is relative to how safe the program is going to be; concern for potential accidents; how long this has all taken; potential groundwater contamination; and death rates in surrounding communities from cancer. Some expressed comfort that the state of Colorado is providing oversight, and some felt the CSEPP exercises have helped a lot.

Transportation of Hydrolysate

Approximately 60 percent of the interviewees were not aware that if the biotreatment technology fails, the alternative plan is to transport neutralized agent to another plant for destruction. When asked what they thought about this alternative, concerns ranged from political to safety to guarded acceptance since something has to be done with the thiodiglycol (hydrolysate, or neutralized mustard agent).

Environmental Cleanup and Base Reuse

A small number of interviewees knew nothing about this program, but a large number reported that they knew something about it, especially because reuse has been in the news so much lately. In

general, the interviewees' understanding of these programs varied greatly. Most believe that if the cleanup is done properly just about every part of the depot is good for something and can be reused. There was some concern with how slowly the cleanup is going and the amount of contamination being left in place. Most interviewees who have knowledge of PuebloPlex activities were very interested in the mounting momentum for the reuse program. Many had been following the various possible reuse scenarios including use as wildlife refuge, storage and other businesses in the igloos and buildings and plans for a solar farm. Most interviewees have no concerns about the reuse activity.

Restoration Advisory Board

About half the community members interviewed were aware that there is a RAB. A few indicated an interest in joining the RAB, but most cited time concerns, an inability to drive at night, or lack of interest as reasons not to join the Restoration Advisory Board.

Overall Communication

Questions were asked to evaluate how community members get information about programs at the depot. Several sources were cited where the community gets information about the site – these sources range from individuals at the depot, the state health department, county commissioners, mail, electronic newsletters and websites. Most of the interviewees are aware of the information repositories, and only a few had suggestions for improving the accessibility of the information.

Just under half of all of the interviewees prefer paper mail to electronic delivery. Those who prefer electronic tend to get most of the news and local information from the internet, social media, employer bulletin boards, etc. Those who prefer to get news in paper form also prefer face-to-face communication. Some suggested that older people and people in lower socioeconomic situations still must get information in paper form or face-to-face communication.

About half of the interviewees reported that they do get information regularly about depot activities.

Environmental Justice

Key environmental justice issues provided by the interview process include:

- a) Just under half of all of the interviewees prefer paper mail to electronic communication.
- b) Some suggested that older people and people in lower socioeconomic positions still must get information in paper form or by face-to-face communication.
- c) About half of the interviewees thought information should be provided in a language other than English.

- d) Those that thought information should be in a language other than English suggested it should be in Spanish.

9. PUBLIC PARTICIPATION PROGRAM OBJECTIVES

The Public Participation Program is implemented through the joint efforts of the U.S. Army Pueblo Chemical Depot, the Program Executive Office Assembled Chemical Weapons Alternatives, Bechtel National, Inc., Colorado Department of Public Health and Environment and Pueblo County. Each of these groups provides input and/or oversight in varying degrees to the activities and presentation materials that constitute the Public Participation Program. Each of these programs will continue to have a designated point of contact; contact information for these contacts can be found in Appendix A.

Objectives of the chemical weapons stockpile disposal program's public participation program are:

- A. Ensure the public understands that their concerns are important to the success of the chemical weapons stockpile disposal program. Create a forum by which the public can communicate their concerns and issues related to the projects openly to all parties.
- B. Keep local residents and stakeholder groups informed of activities, findings and actions related to the chemical weapons stockpile disposal program in a timely manner.
- C. Provide local community residents and stakeholder groups an opportunity to review and comment on activities being conducted.
- D. Keep the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc., PEO Assembled Chemical Weapons Alternatives and other involved agencies informed and sensitive to changes in community concerns, attitudes, information needs and activities regarding the chemical weapons stockpile disposal program.
- E. Effectively serve the public's information needs and address citizens' inquiries through newsletters, fact sheets, and other information dissemination techniques.
- F. Effectively respond to the needs of the media by providing timely responses to inquiries and requests for interviews and briefings. This quick response to the media will help ensure fair and accurate reporting of the findings and recommendations resulting from the environmental studies.
- G. Create and maintain, through an active Public Participation Plan, a climate of understanding and trust aimed at providing information and opportunities for comments and discussion.

H. Provide a unified channel for dissemination of information about the progress of the chemical weapons stockpile disposal program.

I. Identify issues and potential areas of concern to avoid and/or resolve conflict.

9.1 Public Meetings/Availability Sessions

At a minimum, public meetings will be held at various regulatory milestones as the chemical weapons stockpile disposal program proceeds (see Appendix J). Such meetings are required by the Resource Conservation and Recovery Act and Colorado Hazardous Waste Regulations when an application for a permit is submitted to the regulator, and when certain modifications to an existing permit occur. Eventually, the permittees will apply to convert the finalized Research, Development and Demonstration permit to a Part B permit to accommodate ongoing operations. This process will proceed as if it were for a new hazardous waste permit, and will include public meetings in the three unique communities.

In addition to the regulatory requirements, the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc. and PEO Assembled Chemical Weapons Alternatives will be sensitive to the needs of the community and hold public meetings and availability sessions on topics of interest in their public participation programming. These entities will also support the Citizens' Advisory Commission and its mission to provide the bridge between the community and the government and permittees.

9.2 Fact Sheets And Newsletters

Fact sheets and newsletters continue to be an excellent way to let the community know what is happening as depot programs progress. Every effort will continue to provide technical information in a clear, non-technical, bulleted and understandable format with **no acronyms**.

At a minimum, the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc. and PEO Assembled Chemical Weapons Alternatives will provide fact sheets and newsletters by postal mail and electronic mail using the mailing list as discussed in Section 9.3. Point of contact information for the depot, state health department, Assembled Chemical Weapons Alternatives and Bechtel will continue to be included on all public information material.

In addition, fact sheets on any topic related to hazardous waste permitted activities, including chemical weapons storage or stockpile destruction and environmental restoration programs will continue to be generated on an 'as needed' basis. Fact sheets and newsletters can solicit comments

from the public, document the public's contribution to the project progress, announce the next public involvement activity, and/or provide a timeline for upcoming activities and studies. Newsletters can also summarize activities and reports on the project. Pueblo Chemical Depot, Colorado Department of Public Health and Environment, Bechtel National, Inc. and PEO Assembled Chemical Weapons Alternatives will continue to coordinate the preparation and distribution of all information pertaining to permitted chemical storage and demilitarization activities and work together to continuously seek methods for improving stakeholder communications. Environmental restoration information will continue to be coordinated between the state health department and the depot.

9.3 Mailing List

The Colorado Department of Public Health and Environment is responsible for maintaining the permitted facility's mailing list. However, this responsibility is shared between the state health department and the permittees because federal facilities are also responsible for maintaining facility mailing lists, and both are responsible for many mailings. Bechtel National, Inc. will continue to host the online mailing list and all permittees and the state health department will select individuals from each entity to be granted access to the list for maintenance and use. The list will be maintained and updated by ongoing mailings and communications from the U.S. Postal Service. In addition, the state health department and permittees will update the mailing list by:

1. Using meeting sign-up sheet information,
2. Including a solicitation on feedback forms, and
3. Mailing periodic postage-paid postcards requiring recipients confirm their continued desire to receive mailed information from the state health department about depot programs.

9.4 Electronic vs. Paper Mail

The debate regarding both personal preference and resource conservation is causing a reevaluation of how best to deliver information materials to the interested community. The interview summary indicates people are divided regarding their preference to receive information in either format. It is important to recognize that the most sensitive populations – in this case, the people living closest to Pueblo Chemical Depot – are the most in need of project information. As a result of the 2010 interviews, the state health department initiated a survey for individuals on the existing facility mailing list to opt into their preferred method of receiving program information – paper mail or electronic mail. Approximately 25 percent of the mailing list indicated a preference for electronic mail. The mailing list

was updated to reflect this preference and additions to the mailing list are asked what their preferences are before adding them to the list. All program notices, newsletters and fact sheets will be distributed using the facility mailing list according to the recipient's preferred method to get mail. Certain ongoing weekly updates can continue to be distributed electronically, but must include individuals on the mailing list that chose to be included on electronic communications.

9.5 Information Repositories

Information repositories make documents, reports and other public information accessible to interested persons. The information repositories contain all documents, reports, data, and other information to assist in public understanding of the plans, activities, and operations of depot programs including chemical weapons storage, stockpile disposal program and environmental restoration.

Information repositories have been established pursuant to historical community involvement plan interviews for other programs at the Pueblo Chemical Depot. The most recent community interviews indicate that the communities most interested and affected by the chemical weapons stockpile disposal program are generally satisfied with the existing number and locations of repositories. Pueblo Chemical Depot, PEO Assembled Chemical Weapons Alternatives and Bechtel National, Inc. are responsible for the establishment and maintenance of information repositories in Boone, Avondale and Pueblo for the chemical weapons disposal program. Appendix B contains Pueblo Chemical Depot Information Repository information.

9.6 Public Notices

A public notice is an advertisement published in major local newspapers or sent as individual mailings to announce agency decisions, major project milestones, public meetings, or to solicit public comment on planned actions. Notices must be published in a timely manner. In the case of public comment periods, notices must be published the day of the beginning of the comment period. Notices about public meetings should be published at least two weeks in advance of the meetings. Public hearing notices must be advertised no less than 30 days in advance. Notices will, at a minimum, be published in the regional newspaper of record, in this case *The Pueblo Chieftain*. However, items will also be published in other newspapers and media, particularly for major regulatory milestones (Appendix F) and other significant activities (public meetings and comment periods) in the chemical weapons stockpile disposal program.

Urgent notification to the community of incidents or emergencies at the chemical weapons stockpile disposal site must be handled with great diligence and coordination by the Pueblo Chemical Depot, PEO Assembled Chemical Weapons Alternatives, Colorado Department of Public Health and Environment and Bechtel National, Inc. If there is an imminent possibility of off-site chemical releases, coordination with Pueblo County and the Chemical Stockpile Emergency Preparedness Program is essential, and the emergency broadcast system will be used along with all available means to disseminate information such as press releases to television, radio, internet and social media. Both the depot and the pilot plant have contingency plans that specify procedures to be followed in emergency situations. These plans are available for public review at the Information Repositories listed in Appendix B. If distribution of the information is essential but not potentially life threatening, other means of communication may be employed. A high degree of sensitivity and coordination will be exercised by all the parties in such cases.

9.7 Public Comment Periods

As required by the Resource Conservation and Recovery Act and Colorado Hazardous Waste Regulations, a public comment period is a designated amount of time when citizens' comments are formally accepted by the regulatory agency. The length of each public comment period for a regulatory milestone depends on the milestone (see Appendix F). Some comment periods require public meetings. The responsibility for notification of the comment period and public meeting depends on which entity initiates the activity.

It is important to note that representatives of the state health department, Pueblo Chemical Depot and PEO Assembled Chemical Weapons Alternatives are available to discuss concerns, answer questions and accept comments from the community at any time during the chemical weapons stockpile destruction project.

9.8 Website

The Colorado Department of Public Health and Environment has established and will maintain a website providing on-line access to information about the chemical weapons stockpile program. The website will include the portions of the Administrative Record for the program as well as other documents and links to websites related to the project. For website information, see Appendix I. Information not included on the website can be accessed by contacting the state health department public involvement coordinator (see Appendix A).

9.9 Spanish Translation Of Written Information And Meetings

As necessary and appropriate, translation at public meetings and/or translation of permit presentation or informational materials into Spanish will be done when specifically requested, and when the information has direct potential impact on public health and the environment. Costs for translation and production of subsequent products will be borne by the originators of the materials, unless otherwise agreed to or arranged.

Appendix A

Pueblo Chemical Depot, Pueblo Chemical Agent-Destruction Plant and PuebloPlex Points of Contact

Katherine B. DeWeese
Public Affairs Officer
Program Executive Office, Assembled Chemical
Weapons Alternatives
5183 Blackhawk Road, ATTN: AMSCM-ACW,
Bldg. E3331
Aberdeen Proving Ground, MD 21010-5424
Telephone: (410) 436-3398
Fax: (410) 436-1992
Email: katherine.b.deweese.civ@mail.mil

Tom Schultz
Public Affairs Specialist
Pueblo Chemical Agent-Destruction Pilot Plant
Assembled Chemical Weapons Alternatives
45825 Hwy 96 East
Pueblo, CO 81006-9330
Telephone: (719) 549-4959
Fax: (719) 549-4860
Email: thomas.c.schultz.civ@mail.mil

Sandra Romero, Public Affairs Manager
Bechtel Pueblo Team
104 West B Street
Pueblo, CO 81003
Telephone: (719) 549-5280
Fax: (719) 546-0409
Email: svromero@bechtel.com

PCAPP Contract Personnel: Outreach Office
Ron Eccher, Outreach Communications Manager
Pueblo Chemical Stockpile Outreach Office
104 West B Street
Pueblo, CO 81003
Telephone: (719) 546-0400
Fax: (719) 546-0409
Email: ronald.eccher@iem.com

Lori Waters
Public Affairs Officer
U. S. Army Pueblo Chemical Depot
Pueblo, Colorado 81006-9330
Telephone: (719) 549-4135
Fax: (719) 549-4866
Email: lorraine.a.waters2.civ@mail.mil

Russell De Salvo
PuebloPlex
P.O. Box 11467
Pueblo, CO 81001
(719) 947-3770
Email: rdesalvo@puebloplex.com

Jeannine Natterman
Public Involvement Coordinator
CO Department of Public Health and
Environment
Hazardous Materials and Waste Management
Division
4300 Cherry Creek Drive South
Denver, CO 80246
Telephone: (303) 692-3303, or
Toll Free at (888) 569-1831, extension 3303
Fax: (303) 759-5355
Email: jeannine.natterman@state.co.us

Appendix B

Information Repository Locations

Robert Hoag Rawlings Public Library (719) 562-5600

100 East Abriendo Avenue
Pueblo, CO 81004

Hours of Operation: Monday – Thursday 9:00am – 9:00pm

Friday – Saturday 9:00am – 6:00pm

Sunday 1:00pm – 5:00pm

McHarg Park Community Center (719) 947-4180

405 Second Street
Avondale, CO 81022

Hours of Operation: Monday - Friday 8:30am - 7:45pm

Boone Community Center/Fire Station (719) 947-3311

421 1st Street

Boone, CO 81025

Hours of Operation: Monday, Wednesday and Friday 8:00am – 3:00pm

Appendix C

**COLORADO CITIZENS' ADVISORY COMMISSION MEMBERS
May 2016**

Local Members

Ms. Irene Kornelly, Chair
1602 Clemson Drive
Colorado Springs, CO 80909
(H) (719) 591-5157
(C) (719) 330-2359
Fax: 719-591-1305
Email: ikornelly@pcisys.net

Terry Hart, Vice Chair
Pueblo County Commissioner
29685 Hegler Court
Pueblo CO 81006
(H) (719) 948-0071
(W) (719) 583-6050
Fax: (719) 583-6666
Email: hart@co.pueblo.co.us

Jeff Chostner
Pueblo District Attorney
215 W. 10th Street
Pueblo CO 81003
(W) (719) 544-5081
Fax: (719) 583-6696
Email: county@co.pueblo.co.us

Kenneth Griffin
4735 Katahdin Lane
Pueblo, CO 81004
(H) (719) 676-3411
(W) (719) 5618000, ext. 16
kdg1@pejatc.comcastbiz.net

John Norton
319 West Orman Avenue
Pueblo, CO 81004
(H) (719) 543-3741
nortonjp@comcast.net

Mr. Ross Vincent
Sierra Club
140 West 29th Street, #348
Pueblo, CO 81008
(H & W) (719) 561-3117
Fax: (415) 946-3442
Email: socosierra@comcast.net

State Appointed Members

Zach Pierce
Governor's Office of Policy and Initiatives
136 State Capitol Building
Denver, CO 80203
(W) (303) 866-2170
Fax: (303) 866-6368
E-mail: zachary.pierce@state.co.us

Doug Knappe
Program Manager
Hazardous Materials and Waste Management
Division
CO Dept of Public Health and Environment
4300 Cherry Creek Drive S.
Denver, CO 80246
(W) (303) 692-3414
Toll Free: 1 (888) 569-1831 Ext. 3414
Fax: (303) 759-5355
Email: doug.knappe@state.co.us

Appendix D

**RESTORATION ADVISORY BOARD COMMUNITY MEMBERS
April 2016**

Community Members

Paul Wright
Community Co-Chair
48500 State Highway 96 East
Avondale, CO 81022
(719) 947-3264

Ed Bonjour
2776 61st Lane
Boone, CO 81025
(719) 334-1021

Terry Hart
29685 Helger Court
Pueblo, CO 81006
(719) 821-8877

Joan Nielsen
54660 Highway 50 East
Boone, CO 81025
(719) 9473543

John Norton
319 West Orman Avenue
Pueblo, CO 81004
(719) 543-3741

Susan Shields
P.O. Box 191
Avondale, CO 81022
(719) 924-2080

Kenneth Watts
2314 North Elizabeth Street
Pueblo, CO 81005
(719) 542-5700

Government Representatives

Christopher Pulskamp
Army Co-Chair
4825 Highway 96 East
Pueblo, CO 81006
(719) 549-4252

Deb Anderson
CO Dept Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246
(303) 682-3379

Russell De Salvo
PuebloPlex
P.O. Box 11467
Pueblo, CO 81001
(719) 947-3770

Christine Hambric
Base Environmental Coordinator (BEC)
Pueblo Chemical Depot
4825 Highway 96 East
Pueblo, CO 81006
(719) 549-4090

Ken Williams
Pueblo City County Health Department
101 West 9th Street
Pueblo, CO 81003
(719) 583-4300

**Appendix E
Elected Officials**

Federal

Senate

Michael F. Bennett

Washington, DC

261 Russell Senate Office Building
Washington, DC 20510
(202) 224-5852

Web Form: bennet.senate.gov/contact/

Denver Office

1127 Sherman St., Suite 150
Denver, CO 80203
(303) 455-7600
Toll Free: (866) 455-9866
Fax: (303) 455-8851

Pueblo Office

Dwight Gardner, Regional Director
129 West B Street
Pueblo, CO 81003
(719) 542-7550
Fax: (719) 542-7555

Cory Gardner

Washington DC

354 Russell
Senate Office Building
Washington, DC 20510
(202) 224-5941

Web: <https://www.gardner.senate.gov/contact-cory/email-cory>

Pueblo

Cathy Garcia
503 N. Main St., Ste. 426
Pueblo, CO 81003
719-543-1324
Fax: 719-543-7553

House of Representatives

Scott Tipton

Washington, DC

218 Cannon HOB
Washington, DC 20515
202-225-4761

Fax: 202-226-9669

Web: tipton.house.gov

Pueblo Office

Doug Fitzgerald
503 N. Main Street
Suite 658
Pueblo, CO 81003
719-542-1073
Fax: 719-542-1127

Appendix F Elected Officials

State

Colorado Governor

John Hickenlooper
136 State Capitol
Denver, CO 80203-1792
(303) 866-2471
Fax: (303) 866-2003
Web: www.colorado.gov/governor/contact

State Senators

Kevin Grantham
Colorado State Senator, District 2
Office Location: 200 E. Colfax
Denver, CO 80203
Phone: 303-866-4877
E-Mail: kevin.grantham.senate@state.co.us

Leroy Garcia
Colorado State Senator, District 2
Office Location: 200 E. Colfax
Denver, CO 80203
Phone: (303) 866-4878
Pueblo: (719) 778-7386
Email: leroy.garcia.senate@state.co.us

State Legislators

Daneya Esgar
Colorado State Representative, District 46
Office Location: 200 E. Colfax
Denver, CO 80203
Capitol Phone: (303)866-2968
Email: daneya.esgar.house@state.co.us

Clarice Navarro
Colorado State Representative, District 47
Office Location: 200 E. Colfax
Denver, CO 80203
Phone: (303) 866-2905
Email: clarice.navarro.house@state.co.us

James Wilson
Colorado State Representative, District 60
Office Location: 200 E. Colfax
Denver, CO 80203
Capitol Phone: (303) 866-2747
Email: james.wilson.house@state.co.us

Edward Vigil
Colorado State Representative, District 62
Office Location: 200 E. Colfax
Denver, CO 80203
Capitol Phone: (303) 866-2916
Email: evigil@gmail.com

Appendix G

Elected Officials

Pueblo City & County

Pueblo County Commissioners

215 W. 10th Street
Pueblo CO 81003
(719) 583-6000
Fax (719) 583-6696
Email: county@co.pueblo.co.us

Terry Hart
(719) 583-6050

Liane “Buffie” McFadyen
(719) 583-6537

Sal Pace
(719) 583-6536

Pueblo City Council

1 City Hall Place
Pueblo CO 81003
(719) 584-0840
City Manager: Sam Azad

Bob Schilling
(719) 250-4520
bobschilling68@gmail.com

Lawrence Atencio
(719) 248-9141
latencio@pueblo.us

Ed Brown
(719) 671-7450
ebrown@pueblo.us

Ray Aguilera
(719) 415-0400
raguilera@pueblo.us

At Large:

Steve Nawrocki
(719) 994-8900
snawrocki@pueblo.us

Chris Nicoll
(719) 924-5449
cnicoll@pueblo.us

Lori Winner
(719) 252-7306
lovepueblo@yahoo.com

Pueblo City-County Health Department

Sylvia Proud, Director
101 West Ninth Street
Pueblo, CO 81003
(719) 583-4513

Ken Williams,
Director, Environmental Programs
101 West Ninth Street
Pueblo, CO 81003
(719) 583-4330

Appendix H

Local Media

Newspapers

Pueblo Chieftain
825 West 6th Street
Pueblo, CO 81003
(719) 544-0006

Pueblo West View
187 South Purcell Boulevard
Pueblo West, CO 81007
(719) 547-9606

Hispania News
PO Box 15116
Colorado Springs, CO 80935
(719) 540-0220

Radio Stations

KCCY FM and KDZA FM
106 West 24th
Pueblo, CO 81003
(719) 545-2080

KNKN (Hispanic) 107.1 FM/KFEL 970 AM
30 North Electronic Dive
Pueblo, CO 81005
(719) 547-0411

KBIQ
7150 Campus Drive, Suite 150
Colorado Springs, CO 80920
(719) 388-0300

KCME
1921 N. Weber Street
Colorado Springs, CO 80907
(719) 578-5263

**KCSJ News Radio 590 AM, KYZX FM 104.5, &
KGHF 1350 AM**
3305 North Elizabeth, Suite A
Pueblo, CO 81003
719-543-5900

KKPC (CO Public Radio)
7409- South Alton Court
Centennial, CO 80112
(800) 722-4449

KKFM & KKMJ
6805 Corporate Center Dr., Suite 130
Colorado Springs, CO 80919
(719) 593-2700

KRDO
399 South 8th Street
Colorado Springs, CO 80905
(719) 575-6245

KRCC
912 N. Weber Street
Colorado Springs, CO 80903
(719) 473-4801

Television Stations

KKTV – Channel 11
201 W. 8th Suite 460
Pueblo, CO 81003
(719) 542-6247

**KTSC TV Rocky Mountain
PBS**
2200 N Bonforte Blvd
Pueblo, CO 81001
(719) 543-8800

KOAA
2200 7th Avenue
Pueblo, CO 81002
(719) 544-5781

KRDO AM/FM TV
825 West 6th Street
Pueblo, CO 81003
(719) 544-0006

KXRM Fox 21
560 Wooten Road
Colorado Springs, CO 80915
(719) 596-2100

Appendix I

Internet and Social Media Sites

CO Department of Public Health and Environment

Website: <https://www.colorado.gov/pacific/cdphe/pcapp>

Facebook: <https://www.facebook.com/CDPHE/?fref=nf>

Program Executive Office, Assembled Chemical Weapons Alternatives Program (PEO ACWA)

Website: <http://www.peoacwa.army.mil/>

Facebook: <https://www.facebook.com/peoacwa/?fref=nf>

Twitter: <https://twitter.com/acwanews>

Flickr: <https://www.flickr.com/photos/acwa/>

YouTube: <https://www.youtube.com/user/usaeacwa>

Instagram: <https://www.instagram.com/peoacwa/>

Appendix J

Resource Conservation and Recovery Act Public Participation Requirements in Permitting Activities

The following pages are borrowed from the United States Environmental Protection Agency's Resource Conservation and Recovery Act Public Participation Manual, September 1996. The pages summarize public participation activities required in the regulations governing hazardous materials and waste management at permitted facilities.

It is Environmental Protection Agency's expectation that the required activities represent a minimum effort in a public participation program. An effective public participation program will be sensitive to the needs of the community, regulator and permitted facility thus providing a dynamic, responsive communication network among all concerned about the permitted activity. This goal can be achieved by using more of the many tools offered in the Manual, including Public Participation Interviews and Plans.

Public Participation Requirements for Class 1, 2, and 3 Permit Modifications

Class 1

Type of Changes - Routine and administrative changes

Required Activities

Within 90 days of implementing a change, facility must notify all parties on mailing list.

Class 2

Type of Changes - Improvements in technology and management techniques

Required Activities

Day 1: Regulatory agency receives modification request.

Day 7: Facility publishes newspaper notice, notifies mailing list, and places copy of permit modification request and supporting documents in accessible location.

Days 15-45: Facility holds public meeting.

Day 60: Written public comments due to regulatory agency.

Day 90: Regulatory agency response to modification request due, including response to written comments. Deadline may be extended 30 days.

Day 120: If regulatory agency has not responded, requested activity may begin for 180 days under an automatic authorization.

Day 250: If regulatory agency still has not responded, facility notifies public that authorization will become permanent unless regulatory agency responds within 50 days.

Day 300: If regulatory agency has not responded activity is permanently authorized.

Regulatory agency must notify mailing list within 10 days of any decision to grant or deny modification request, or after an automatic authorization goes into effect.

Class 3

Type of Changes - Major changes to a facility and its operations

Required Activities

Day 1: Regulatory agency receives modification request.

Day 7: Facility publishes newspaper notice, notifies mailing list, and places copy of the permit modification request and supporting documents in an accessible location.

Days 15-45: Facility holds public meeting.

Day 60: Written public comments due to regulatory agency.

After the conclusion of the 60-day comment period, the regulatory agency must grant or deny the permit modification request according to the permit modification procedures of 40 CFR Part 124. These include:

- . Issuing public notice of the draft permit modification or intent to deny the modification;
- . Preparing a fact sheet or statement of basis;
- . Announcing a 45-day public comment period;
- . Holding a public hearing, if requested, with a 30-day advance notice;
- . Considering and responding to all significant written and oral comments received during the 45-day comment period; and
- . Issuing notice of the final permit modification.

In addition, the regulatory agency must consider and respond to all significant written comments received during the 60-day comment period.

Chapter Summary

Some permitting situations will call for public participation that goes beyond the regulatory requirements

The "RCRA Expanded Public Participation" rule (60 FR 63417, December 11, 1995), provides for earlier public participation in the permitting process, expands public notice for significant events, and enhances the exchange of permitting information

Environmental Protection Agency strongly encourages permitting agencies and facilities to ensure equal access to permitting information and provide an equal opportunity for all citizens to be involved in the RCRA permitting process

The permit decision process and the required public participation activities can be divided into four key steps:

1. The Pre-Application Stage

- Facility gives public notice and holds an informal public meeting
- Agency develops a mailing list
- Additional activities that may apply include: community assessments, public participation plans, information repositories, and fact sheets

2. Application Submittal, Notice, and Review

- Agency issues a notice to the facility mailing list and state and local governments
- Agency makes application available for public review
- Additional activities that may apply include: observation decks, facility tours, community tours, workshops, and news conferences.

3. Preparation of Draft Permit, Public Comment Period, and the Public Hearing

- Agency issues public notice of draft permit (or intent to deny)
- Agency prepares a fact sheet or statement of basis
- Agency announces a 45-day public comment period
- Hold a public hearing, if requested or at the agency's discretion, with 30-day advance notice
- Additional activities that may apply include: information sessions, workshops, news releases, and fact sheets.

4. Response to Public Comments and the Final Permit Decision

- Agency responds to all significant comments raised during the public comment period, or during any hearing
- Agency issues notice of final permit decision

The regulatory agency can initiate a permit modification under 40 CFR 270.41 following the full permitting procedures of 40 CFR Part 124. A facility may also initiate a Class I, 2, or 3 permit modification under 40 CFR 270.42. For facility-initiated modifications, public participation activities are required of both the facility and the regulatory agency, as described below:

1. Class 1

Facility Requirements:

- Notify mailing list within 90 days

2. Class 2

Facility Requirements:

- Notify mailing list and public newspaper notice
- Announce 60-day public comment period
- Place modification request and supporting documentation in an accessible location in the vicinity of the facility
- Hold public meeting
- If the regulatory agency does not act within 250 days of the modification request, notify mailing list that automatic authorization will become permanent in 50 days

Regulatory Agency Requirements:

- Allow 60 days for public comment on the modification request
- Consider all written comments and respond in writing to all significant comments
- Issue notice to the mailing list within 10 days of any decision to grant or deny a modification request
- Issue notice to the mailing list within 10 days after an automatic authorization goes into effect

3. Class 3

Facility Requirements:

- Notify mailing list and publish newspaper notice
- Announce 60-day public comment period
- Place modification request and supporting documentation in an accessible location in the vicinity of the facility
- Hold public meeting

Regulatory Agency Requirements:

- Allow 60 days for public comment on the modification request
- Issue public notice
- Prepare a fact sheet or statement of basis
- Announce a 45-day public comment period on draft permit decision
- Hold a public hearing, if requested, with 30-day advance notice
- Issue or deny the modification request
- Respond to written and oral comments from the 45-day comment period
- Consider and respond to all significant written comments received during the 60-day comment period

For Class 2 or 3 modifications, the permitting agency may grant a facility temporary authorization to perform certain activities for up to 180 days. The facility must notify the public within seven days of making the request. The agency may grant a temporary authorization without prior public notice and comment.

For facilities seeking permits, the public has the opportunity to comment on closure and post-closure plans and any amendments to the plans as part of the permitting process and permit modification procedures. The public can also comment and request hearings on closure and post-closure plans submitted by interim status facilities. The permitting agency can initiate, and the facility can request, modifications to interim status plans; these requests are also subject to public comment.