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**PUBLIC PARTICIPATION PLAN  
FOR THE CHEMICAL WEAPONS STOCKPILE DISPOSAL PROGRAM  
U. S. ARMY PUEBLO CHEMICAL DEPOT  
PUEBLO, COLORADO  
JULY 2005**



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## **EXECUTIVE SUMMARY**

The purpose of this Public Participation Plan is twofold: (1) to establish ways for sharing knowledge about the chemical weapons disposal mission at Pueblo Chemical Depot; and (2) to allow members of the community surrounding the U.S. Army Pueblo Chemical Depot to communicate openly with the Department of Defense, Program Manager Assembled Chemical Weapons Alternatives the Army, Colorado Department of Public Health and Environment and the systems contractor, Bechtel National, Inc. about chemical weapons stockpile disposal. 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 document is consistent with the EPA guidance document Resource Conservation and Recovery Act Public Involvement: A Handbook, 1996.

Community interviews were conducted during September-October 2003 to identify the specific concerns, priorities and personalities of the communities affected by the various programs at the Depot. The objectives of this Public Participation Plan and the activities to be carried out to facilitate two-way communication between the parties responsible for the chemical weapons stockpile disposal program and communities surrounding the Depot are described in the plan. The plan’s objectives and activities form a comprehensive community relations strategy.

## **1. INTRODUCTION**

Most citizens want to know about and participate in decisions that may affect their community. The purpose of this Public Participation Plan (the Plan) is to establish avenues for sharing knowledge and encouraging community participation regarding the chemical weapons stockpile disposal program for the U.S. Army's Pueblo Chemical Depot (the Depot), located near Pueblo, Colorado. This Plan, a required document under the provision of the Resource Conservation and Recovery Act and Colorado Hazardous Waste regulations, outlines specific public participation strategies for addressing these goals. It is expected that the Plan will be a flexible, "living" document that can adjust to evolving community needs and concerns.

### **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 Resource Conservation and Recovery Act and the Colorado Hazardous Waste Regulations.
- 2. U.S. Environmental Protection Agency (EPA) Region VIII** EPA provides oversight to the state of Colorado in its enforcement of the hazardous waste regulations.
- 3. Pueblo Chemical Depot** The Depot's current primary mission is the safe, secure storage of mustard agent-filled chemical munitions. The Depot is also involved with environmental restoration of contamination resulting from prior missions, installation reuse, support of chemical munitions destruction, and the Chemical Stockpile Emergency Preparedness Program (CSEPP). While the goals and objectives of each of these missions overlap with regard to community involvement, the Depot handles them as separate programs largely due to the various reporting and funding channels of each mission and the requirements of different regulating authorities and statutes.
- 4. Program Manager Assembled Chemical Weapons Alternatives** This Department of Defense agency headquartered at Aberdeen Proving Ground, Md., is responsible for project management of destroying the Depot's chemical weapons stockpile. The Program Manager 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 will design, build, systemize, pilot test, operate and ultimately close the facility known as the Pueblo Chemical Agent-Destruction Pilot Plant. Bechtel National, Inc. was awarded the systems contract in September 2002. Mustard-agent filled munitions will be disassembled and destroyed at the facility, when permitted and constructed, using the methods of hydrolysis/neutralization (agitation or mixing of the mustard agent and explosive components with water and caustic to produce hydrolysate) and biodegradation (treatment of the hydrolysate using bacteria). Since waste mustard-agent filled munitions are hazardous wastes in Colorado, the construction, operation, and closure of the facility for the treatment and storage of these wastes requires a permit from the Colorado Department of Public Health and Environment.

**6. Chemical Materials Agency** The Pueblo Chemical Depot commander reports to the Chemical Materials Agency, headquartered at Aberdeen Proving Ground, Md. The Army's Chemical Materials Agency is responsible for the storage of chemical weapons at all Army installations in the United States and destruction of chemical weapons stockpiles at all sites other than Pueblo Chemical Depot and Blue Grass Army Depot. The director of the Chemical Materials Agency is also the Program Manager Assembled Chemical Weapons Alternatives.

**7. Colorado Chemical Demilitarization Citizens' Advisory Commission** The Commission represents community interests and provides a vital link between the Pueblo community and the military by providing a forum for exchanging information about chemical weapons disposal. Its sub groups include the Acceleration Options Working Group; the Public Involvement Working Group; and the Permitting Working Group.

This Plan presents the programmatic community involvement objectives and strategies to promote public awareness regarding the chemical weapons stockpile disposal program. Decisions about public participation and involvement efforts are based on public input collected through community interviews, response cards, public comments and other means. The Plan will be implemented upon consideration of comments from the U.S. Environmental Protection Agency (EPA), Pueblo City-County Health Department, the Citizens' Advisory Commission's

Public Involvement Working Group, and the Pueblo community, and approval by the Colorado Department of Public Health and Environment (the state health department).

## **2. SITE DESCRIPTION**

The Depot is an 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 and conventional and chemical munitions. The Depot's current missions include storage of chemical munitions, destroying the chemical weapons stockpile, and remediation of environmental contamination resulting from prior missions. The Depot currently stores several hundred thousand mustard chemical agent munitions, less than 10% of the nation's stockpile. The munitions are 105-millimeter (mm) and 155-mm projectiles, and 4.2-inch mortar cartridges. The Depot is owned by the U.S. Army and is under the operating authority of the U.S. Army Chemical Materials Agency. The Program Manager for Assembled Chemical Weapons Alternatives manages the chemical weapons stockpile disposal program.

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 explosive compounds and solvents, etc. These wastes are being investigated and remediated by the environmental restoration project, which is separate from the chemical weapons stockpile disposal program.

### **3. PHYSICAL DESCRIPTION**

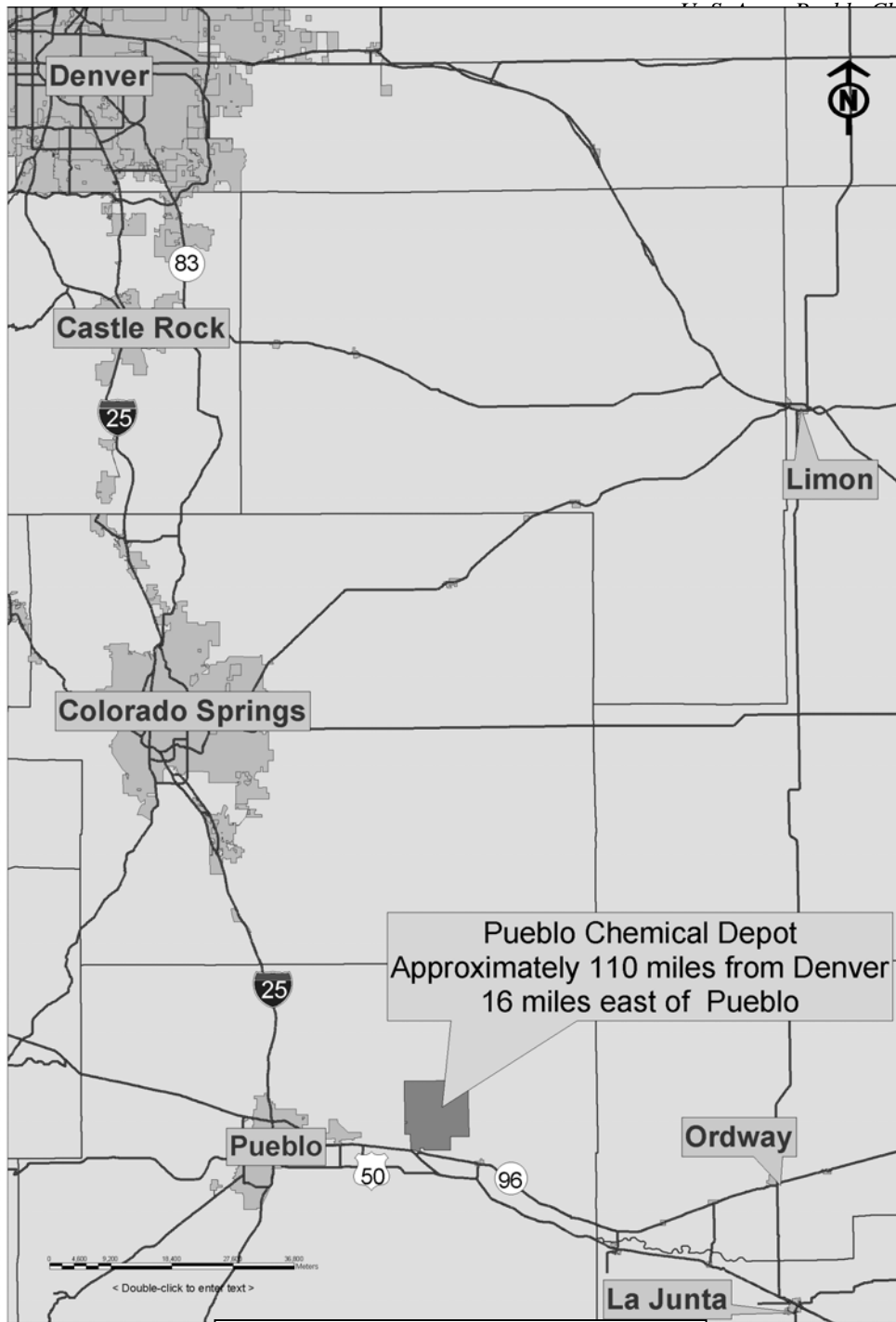
The Depot is located in southeastern Colorado, east of Pueblo and north of the Arkansas River in Pueblo County (**Figure 1**). The Depot includes more than 23,000 acres of prairie land with a variety of buildings and other structures, as well as open and undeveloped areas.

Directly to the south of the Depot is the predominantly agricultural community of North Avondale, with approximately 30 homes. The town of Avondale is a few miles farther 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 Depot is divided into five regions defined by area activities: Western Demolition Area, Eastern Demolition Area, Munitions Storage Area, Ammunition Workshop (AWS) Area, and Warehouse-Landfill Area.

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

U.S. Highway 50, 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 Test Center Incorporated access road. Several small dirt roads are also present around the periphery of the Depot. The perimeter of the Depot property is fenced.

The Administration Area contains office buildings and maintenance shops. A system of interior roads is maintained at the Depot. There are about 170 miles of roads and most are paved.



**Figure 1: Pueblo Chemical Depot  
Pueblo, Colorado**



#### **4. LOCAL HISTORY**

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

Industry and government facilities have played a large part in the development of the Pueblo area. Rocky Mountain Steel Mills, formerly Colorado Fuel and Iron (CF&I), was founded in 1872. There were five historic smelting facilities in the area. The defense industry buildup, sparked by WWII, 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 147,284 residents in 2002. The city of Pueblo had an estimated population of 104,124 in 2002. The remainder of the county population is dispersed throughout the county in small communities, or on farms or ranches. Three small communities are located south of the Depot: Boone (estimated population 329 in 2002), North Avondale (approximately 30 homes in 2002) and Avondale (census 2000 population of 754). It is important to note that the migrant population in and near Boone and Avondale has steadily increased, as evidenced by increased demands on community resources. Avondale Water and Sanitation District has had to double its water output to accommodate the increase in number of residents, and has plans to further increase production in the near future.

The population of workers and residents at the Depot is changing as decisions are made concerning the Depot's mission and future base closure. As of October 2003, the demographics of the Depot were as follows:

➤ Employees:

175 civilian workers assigned to the Depot (as of Fall 2003)

1 military worker assigned to the Depot (2, as of June 2005 - the Depot Commander, and his assistant)

A company-sized unit of soldiers activated (deactivated January 2005)

➤ Residents:

10 military and civilian residents

15 dependents (approximate)

➤ Contractors:

75-200 contractors – number varies based on contract activities [Total Environmental Restoration Contract (TERC), U.S. Army Corps of Engineers, Bechtel National, Inc.]

➤ Tenants:

20 Tenants (about 50 workers) through the Depot Development Authority Master Lease

## **6. REGULATIONS**

The Department of Defense Program Manager for Assembled Chemical Weapons Alternatives (ACWA) currently manages the chemical weapons stockpile disposal program at the Depot. Chemical weapons have been stored at the Depot since the mid-1950s. In 1985, Congress directed the Army to destroy its stockpile of chemical weapons at U.S. Army Pueblo Chemical Depot and other locations. In 1997, the United States ratified the Chemical Weapons Convention, an international treaty that directs all member nations to destroy their chemical weapons and production facilities.

Activities related to the demilitarization program at the Depot increased recently due to several events:

March 2002 – Final environmental impact statement issued.

May 2002 – The Department of Defense selected neutralization followed by biotreatment as the preferred option for destroying the Depot stockpile.

September 2002 – Bechtel National, Inc. was selected as systems contractor for the Depot.

October 2002 – Congress assigned ACWA responsibility for destruction of chemical weapons at the Depot.

ACWA, the Depot, and Bechtel National, Inc., are working together to design, build, systemize, pilot test, operate, and close a plant to destroy the chemical weapons stockpile. The 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 stage of a hazardous waste permit to construct the plant. Other permits such as surface water management, Air Permit For Construction, Air land development and the Pueblo County Certificate of Designation will be required prior to construction.

The chemical weapons stockpile disposal program will proceed by conducting three phases for a Research, Development, and Demonstration (RD&D) Permit to design, build and test the facility for the treatment of mustard-agent filled munitions. Once the facility is permitted, constructed, and successfully demonstrates that it can treat chemical munitions in a manner that is protective of human health and the environment, the Pueblo Chemical Depot and Bechtel National, Inc. would apply for a standard Part B Hazardous Waste Treatment and Storage Permit (as a Class 3 permit modification) to treat and destroy the remaining chemical weapons stockpile currently stored at the Depot. Minimum public participation requirements for this permitting process will include:

- a 45-day comment period on the modifications to the Research, Development and Demonstration permit for each phase (3 phases total),
- a 60-day public comment period at the submittal of the standard Part B Permit application – a Class 3 permit modification request to allow full operation of the facility, and
- a 45-day public comment period on the standard draft Hazardous Waste Treatment and Storage Permit.

For a description of the minimum public participation requirements for this permitting process, please refer to Figure 2.

## **7. PAST AND PRESENT PUBLIC PARTICIPATION**

**a) Past Public Participation** The Pueblo Chemical Depot has implemented a comprehensive Community Involvement Program since 1991 primarily addressing concerns about the environmental restoration of the Depot property. For a detailed list of historical Depot

community involvement activities, please see Appendix F. The Program Manager for Chemical Demilitarization, the Army program then responsible for destruction of the chemical munitions, provided much of the public information about the chemical weapons stockpile destruction program from 1986-2002.

**b) Present Participation**

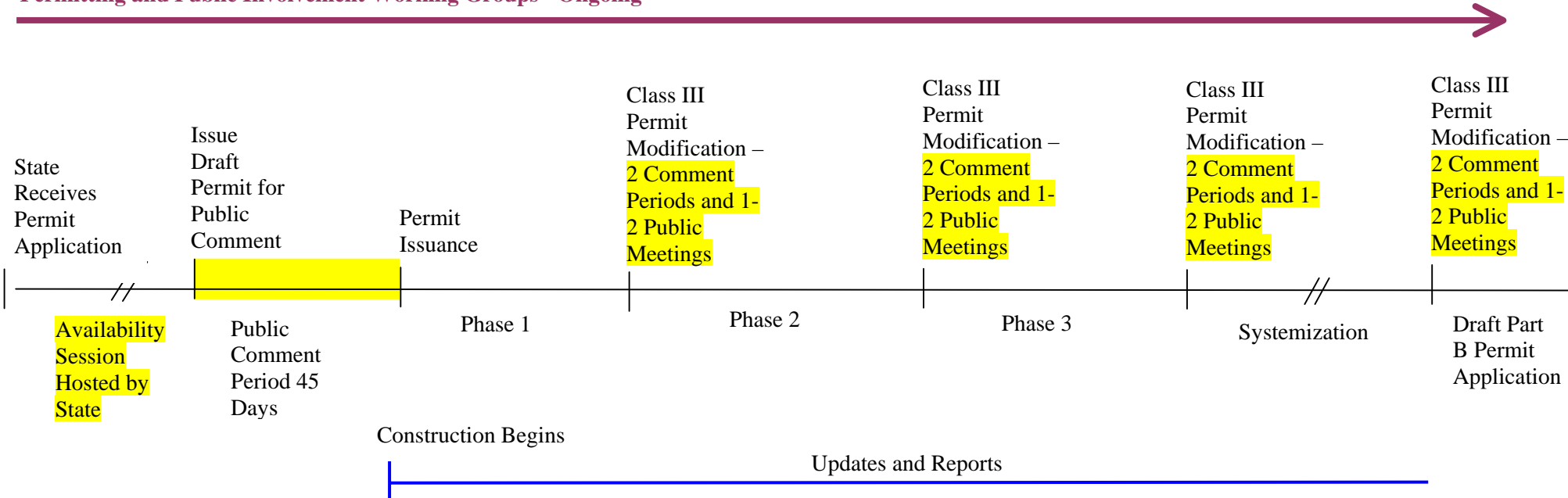
**b.1) Colorado Citizen's Advisory Commission** An important vehicle for public involvement on the chemical demilitarization program is the Colorado Citizens' Advisory Commission. Citizens' Advisory Commissions were created as part of the National Defense Authorization Act in 1993 for eight states in which chemical weapons stockpiles are stored. The Colorado Citizens' Advisory Commission provides a vital link between the Pueblo community and the Army by providing a forum for exchanging information about chemical weapons stockpile disposal. The Colorado Citizens' Advisory Commission meets regularly with the community and representatives of the Army, the Program Manager for Assembled Chemical Weapons Alternatives, the state of Colorado and the systems contractor at monthly 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 his or his successors' discretion. Although the Commission receives federal funding from the Department of Defense, it operates independently. The Citizens' Advisory Commission had a major role in advising the Army on the Pueblo technology decision and on acceleration options that were considered in 2003.

**b.2) Pueblo Chemical Stockpile Outreach Office** The Community 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 Manager ACWA or other appropriate agency. The outreach office houses a variety of resources including technical documents, brochures and electronic media, and develops 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 and staffed by the systems contractor, Bechtel National, Inc., which is also required under its contract to implement an active public involvement program.

**Figure 2**  
**Minimum Community Involvement During Pueblo Chemical Agent-Destruction Plant**  
**Research Design and Demonstration Permitting Process**

**Citizens' Advisory Commission Meetings:  
 Permitting and Public Involvement Working Groups - Ongoing**



## **8. COMMUNITY COMMENTS, ISSUES, AND CONCERNS**

To evaluate the specific concerns, priorities, and communication needs of the community, interviews were conducted throughout Pueblo County during September-October 2003. Interviewees included citizens, local formal and informal community leaders, environmental groups, the business community, the educational community, and elected officials. Additionally, three local information meetings were held to conduct abbreviated interviews of individuals, as they were available.

Comments and concerns discussed in this section were most recently identified during interviews conducted by the Depot, Bechtel National, Inc., the state health department, EPA, and Pueblo County Department of Emergency Management. Interviews were designed to:

- Collect information on community perceptions of Depot programs and activities,
- Determine preferred methods the community wants to receive information about the project,
- Determine the best way for the community to provide input to the various entities responsible for the project. The interviews were designed to gather appropriate information to develop a Public Participation Plan responsive to community concerns and preferences.

**a.) Interview Summary** The majority of interviewees were aware of the Depot and its activities. Chemical weapons disposal, its economic impact, and water contamination were the areas of most interest to the interviewees. Some interviewees expressed concerns about the environment once the chemical weapons stockpile is destroyed. They were emphatic that the stockpile should be destroyed in an environmentally safe manner.

In both the early site interviews conducted in the 1990s for the initial Community Involvement Plan through the current interviews, the issue of a lack of trust for the Army remains a stumbling block for the community. Interviewees expressed concern that not enough information is provided on a timely basis. For example, they expressed concern over inadequate information on leaking chemical munitions found in igloos in late 2003. Many said oversight by objective parties and constant monitoring could go a long way to gaining their trust.

Some interviewees had no contact with any representatives from the county, the state, or any federal agency about the Depot. Many of the persons interviewed have been contacted by

representatives on a variety of topics, including: emergency preparedness, contracting for jobs, job applications, and base reuse. Many expressed concern over the emergency preparedness initiatives. Several interviewees discussed their inability to hear and understand the outdoor alert sirens. They felt that the sirens' usefulness was inhibited by these shortcomings. (This information was forwarded to CSEPP personnel.)

About half of the interviewees were aware of the neutralization followed by bioremediation technology that will be used at the Depot to destroy the chemical weapons. The remainder of the interviewees were under the erroneous impression that incineration was the method that would be used to destroy the Depot's chemical weapons stockpile.

Almost all of the interviewees were aware of the existing information repository locations, and all were satisfied with them. The repositories for the chemical weapons stockpile disposal program are located on the Depot, at the Boone Town Hall, at the Robert Hoag Rawlings Public Library in Pueblo, and at Avondale Water and Sanitation District. News that the environmental restoration program information repository at Avondale Elementary School will soon be moved to the McHarg Community Center was met with favorable comments by the interviewees.

A majority of the interviewees are currently receiving information on a variety of topics about the Depot. The information they receive is coming through the mail or by attending meetings. Most expressed a desire to receive information about the Depot on all topics. Job opportunities, contract/construction opportunities, general information on environmental cleanup, and progress being made in the disposal process topped the list of items.

Written information received on a monthly or quarterly basis was preferred. Overwhelmingly, the majority of the interviewees indicated a desire to be notified immediately in cases of important information, for example, a leaking munition.

Emergency information was another area of high interest. The recent delivery of shelter-in-place kits was identified as an area where receiving more information was important. Keeping parents informed about schools and their emergency procedures was identified as an area needing improvement.

Preferred or suggested methods identified by the interviewees for sharing information were:



- Flyers mailed to Depot mailing list
- Attending Boone Town Council Meetings
- Newsletters
- Conduct small meetings in small, community locations with refreshments. In fact, several locations offered their businesses to host such get togethers.
- Boone bread distribution day
- Email (evenly divided as to yes or no)
- Websites
- General Depot information line
- Telephone
- Television
- Newspaper
- School District 60 information flyers
- Billboard on I-25
- Logo Identifications
- Repositories (open during evening hours)
- Regular advertisement in newspaper
- Avondale Water Board – flyers posted

Without exception, interviewees asked that the information provided be clear, concise, non-technical and bulleted. Information should be easy to read and quickly digestible. Interviewees soundly rejected the use of acronyms.

The media most identified as sources of information are:

- Newspapers -*Pueblo Chieftain*; *The Gazette* (Colorado Springs), and the *Denver Post*.
- Television - Channels 5, 11, and 13.
- Local radio stations such as KCCY, KCSJ, KRMX Radio Lobo, 105.5, 101.9 Canon City, Christian station - KGFT, KOA, KRCC, REV 89, Pueblo Cable TV.

Many of the interviewees said they have contacts for gaining information about the Depot. These contacts included the Depot Public Affairs Office and Environmental Management Division, the Outreach Office, Commissioner John Klomp, J. Ross Vincent, the City of Pueblo staff, representatives at the Boone Town Hall, and individuals at the McHarg Community Center.

Some interviewees believe that their concerns are heard and responded to while others had not given feedback to anyone. Some expressed the idea that there could be improvement in listening to their concerns.

A majority of the interviewees believed that all information should be translated into Spanish, while some believed information should be translated only upon request. The community has been very clear on this point. The majority of Pueblo's Hispanic population has been in the Pueblo area for several generations, and considers English to be their primary language. However, a small segment of the population, primarily older individuals, and as mentioned the increasing migrant population still considers Spanish to be their primary language. Therefore, consideration of these dynamics will determine which materials should be considered for translation into Spanish. One interviewee believed the information should be translated into Italian.

## **9. PUBLIC PARTICIPATION PROGRAM OBJECTIVES**

The Public Participation Program is implemented through the joint efforts of the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc., the Program Manager Assembled Chemical Weapons Alternatives, Pueblo County, other local, state, and federal agencies, and the Pueblo community. Each of these groups provides input and/or oversight in varying degrees to the activities and presentation materials that constitute the Public Participation Program. Pueblo Chemical Depot, Program Manager for Assembled Chemical Weapons Alternatives, Colorado Department of Public Health and Environment and Bechtel National, Inc., will each designate a point of contact for the its respective entity. The names and contact information can be found in Appendix A.

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

- A. Ensure that 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 openly to all parties their concerns and issues related to the projects.
- 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., Program Manager 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 citizen's 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.
- J. Public Participation program professionals from the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc., Program Manager Assembled Chemical Weapons Alternatives and other involved agencies meet at least quarterly to re-examine these objectives and measure the program's effectiveness.

## **9.1 Public Meetings/Availability Sessions**

At a minimum, Public Meetings and/or Availability Sessions will be held at various regulatory milestones as the chemical weapons stockpile disposal program proceeds. Such meetings/sessions are required when any of the following occur, and are the responsibility of the entity listed: An illustration of the public involvement milestones anticipated during the chemical weapons stockpile disposal program is included in Figure 2.

- Before an application for a hazardous waste permit is submitted to the regulatory agency, in this case the Colorado Department of Public Health and Environment.
  - This meeting is the responsibility of the Applicant, in this case Pueblo Chemical Depot and Bechtel National, Inc.
- Upon release of a draft Permit.
  - This meeting is the responsibility of the regulatory agency, in this case the Colorado Department of Public Health and Environment.
- Upon certain modifications of the Permit.
  - Responsibility for permit modification meetings varies depending on who initiated the modification. Please see Appendix G for a summary of the different types of modifications and their requirements.

In addition to the regulatory requirements, the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc. and Program Manager 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.

Information gathered in the Community Interview process revealed a divergence in how the communities of Pueblo, Boone and Avondale prefer to be updated. Pueblo, a more urban setting, is amenable to meetings and gatherings in public places. Avondale residents prefer to be communicated with in a more casual, personal manner by people they know and trust, and are more amenable to availability sessions. Residents in Boone are less inclined to have large gatherings or meetings, and prefer to discuss project information and their concerns in more intimate small gatherings. The Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc. and Program Manager Assembled Chemical

Weapons Alternatives will tailor the implementation of public meetings and availability sessions to accommodate these communities' preferences.

## **9.2 Fact Sheets And Newsletters**

Fact sheets and newsletters are an excellent way to let the community know what is happening at all stages of the chemical weapons stockpile destruction process. The community had some very specific advice on what it likes to see in such information. Every person interviewed was clear on this point: provide technical information in a clear, non-technical, bulleted and understandable format.

At a minimum, the Pueblo Chemical Depot, the Colorado Department of Public Health and Environment, Bechtel National, Inc. and Program Manager Assembled Chemical Weapons Alternatives will provide fact sheets and newsletters in the format requested by the community at the regulatory milestones listed in Appendix G. Point of Contact information for the Depot, state health department and Bechtel will be included on all public information material.

In addition, fact sheets on any topic related to the chemical weapons stockpile destruction program and environmental regulations will 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 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 Program Manager Assembled Chemical Weapons Alternatives will coordinate the preparation and distribution of all information pertaining to permitted activities.

## **9.3 Mailing List**

The Colorado Department of Public Health and Environment is responsible for maintaining the permitted facility's mailing list. The list will be maintained and updated by ongoing mailings and communications from the U.S. Postal Service. In addition, the state health department will update the mailing list by:

1. Using meeting sign-up sheet information,

2. Including a solicitation on fact sheets and newsletters, and
3. Mailing periodic postage paid postcards requiring recipients' to confirm their continued desire to receive mailed information from the state health department about the chemical weapons stockpile disposal program.

#### **9.4 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 the chemical weapons stockpile disposal program.

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 satisfied with the existing number and locations of information repositories. The Public Information Repositories are listed in Appendix B.

Pueblo Chemical Depot and Bechtel National, Inc. are responsible for the establishment and maintenance of information repositories in Avondale and Pueblo for the chemical weapons disposal program. The Colorado Department of Public Environment's Hazardous Materials and Waste Management Division will maintain the information repository in Boone.

#### **9.5 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. Appendix G specifies which entity is responsible for placing the public notices for which regulatory milestone. Notices must be published in a timely manner. In the case of public comment periods, notices must be published by 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, whenever possible. 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, the Pueblo Chieftain. However, publication in other newspapers and media will be done, particularly for major regulatory milestones and other significant activities 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, Program Manager for 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 use of the emergency broadcast system may be utilized. If distribution of the information is essential but not potentially life threatening, other means of communication may be employed – such as press releases to television and radio media. A high degree of sensitivity and coordination will be exercised by all the parties in such cases.

## **9.6 Public Comment Periods**

A public comment period is a designated amount of time when citizens' comments are formally accepted by the regulatory agency. The lengths of each public comment period for regulatory milestones depend on the milestone, and are listed in Appendix G. 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 are available to discuss concerns, answer questions and accept comments from the community at any time during the chemical weapons stockpile destruction project.

## **9.7 Web Site**

The Colorado Department of Public Health and Environment has established and will maintain a web site providing on-line access to information about the chemical weapons stockpile program. The web site will include the Administrative Record for the site as well as

other documents and links to web sites related to the project. The web site is at the following address [www.cdphe.state.co.us/hm/pueblochemdemil.asp](http://www.cdphe.state.co.us/hm/pueblochemdemil.asp).

### **9.8 Spanish Translation Of Written Information And Meetings**

As necessary and appropriate, translation at public meetings and/or translation of 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.



## **Appendix A**

### **Pueblo Chemical Depot Chemical Stockpile Disposal Program Points of Contact**

Katherine B. DeWeese  
Public Affairs Officer  
Program Manager 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.deweese@us.army.mil](mailto:katherine.deweese@us.army.mil)

Jeannine Natterman, Public Information Officer  
Colorado 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 1-888-569-1831, extension 3303  
Fax: 303-759-5355  
Email: [jeannine.natterman@state.co.us](mailto:jeannine.natterman@state.co.us)

John Schlatter, Public Affairs Manager  
Bechtel Pueblo Team  
104 West B Street  
Pueblo, CO 81003  
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Fax: 719-546-0409  
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Marilyn Thompson, Public Affairs Officer  
U. S. Army Pueblo Chemical Depot  
Public Affairs Office  
Pueblo, Colorado 81006-9330  
Telephone: 719-549-4135  
Fax 719-549-4866  
Email: [Marilyn.Thompson@pcd.Army.mil](mailto:Marilyn.Thompson@pcd.Army.mil)

## **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

**Avondale Water and Sanitation District      719-947-0977**

321 Third Street

Avondale, CO 81022

Hours of Operation: Monday – Friday 8:00am – 5:00pm

**Boone Town Hall                              719-947-3311**

100 Baker Street

Boone, CO 81025

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

## **Appendix C**

### **Elected Officials**

#### **Federal**

##### **Senate**

Wayne Allard

Washington, D.C. Office  
525 Dirksen  
Senate Office Building  
Washington DC 20510  
(202) 224-5941  
fax: 202-224-6471

Pueblo Office  
411 Thatcher Bldg.,  
5th & Main Sts.  
Pueblo, CO 81003  
(719) 545-9751  
Fax: (719) 545-3832

Ken Salazar

Washington, DC Office  
702 Hart Senate Office Building  
Washington, DC 20510  
202-224-5852 (Phone)  
202-228-5036 (Fax)

Pueblo Office  
121 West B Street  
Pueblo, CO 81003  
Phone: (719) 542-7550  
Fax: (719) 542-7555

##### **House of Representatives**

John Salazar

Washington, D.C. Office  
1531 Longworth House Office Building  
Washington, D.C. 20515-0603  
Phone: (202) 225-4761

Pueblo Office  
134 West B Street  
Pueblo, CO 81003  
Phone: (719) 543-8200

## Appendix C

### Elected Officials

#### State

##### Governor

Bill Owens  
136 State Capitol  
Denver, CO 80203-1792  
(303) 866-2471  
Fax: (303) 866-2003

##### State Senators

Ken Kester  
Colorado State Senator, District 2  
Office Location: 200 E. Colfax  
Denver, CO 80203  
Phone: 303-866-4877  
E-Mail: [ken.kester.senate@state.co.us](mailto:ken.kester.senate@state.co.us)

Abel J. Tapia  
Colorado State Senator, District 3  
Office Location: 200 E. 14th Ave., 3rd Floor  
Denver, CO 80203  
Capitol Phone: 303-866-2581  
E-mail: [abel.tapia.senate@state.co.us](mailto:abel.tapia.senate@state.co.us)

##### State Legislators

Dorothy B. Butcher  
Colorado State Representative, District 46  
Office Location: 200 E. Colfax  
Denver, CO 80203  
Phone: (303) 866-2968  
E-mail: [dorothy.butcher.house@state.co.us](mailto:dorothy.butcher.house@state.co.us)

Liane "Buffie" Mcfadyen  
Colorado State Representative, District 47  
Office Location: 200 E. Colfax  
Denver, CO 80203  
Phone: (303) 866-2905  
E-Mail: [mcfadyen2002@hotmail.com](mailto:mcfadyen2002@hotmail.com)

## **Appendix C**

### **Elected Officials**

#### **Pueblo City & County**

##### **Pueblo County Commissioners**

215 W. 10<sup>th</sup> Street  
Pueblo CO 81003  
(719) 583-6000  
Fax (719) 583-6696  
Email: [county@co.pueblo.co.us](mailto:county@co.pueblo.co.us)

##### **Pueblo City Council**

1 City Hall Place  
Pueblo CO  
(719) 584-0840  
City Manager: Dave Galli

Anthony Nunez  
(719) 583-6536

Ray Aguilera  
(719) 549-3052

Robert Schilling  
(719) 546-1717

Matt Peulen  
(719) 583-6537

Jeff Chostner  
(719) 544-5081

Dr. Bill Sova  
(719) 542-2225

Loretta Kennedy  
(719) 583-6538

Mike Occhiato  
(719) 545-8181

Randy Thurston  
(719) 566-1911

Gilbert Ortiz  
(719) 544-0463

#### **Local Health Department**

Dr. Christine Nevin-Woods, Director  
Pueblo City-County Health Department  
151 Central Main Street  
Pueblo, CO 81003  
719-583-4300

Heather Maio, Director  
Environmental Programs Annex  
131 South Main  
Pueblo, CO 81003  
719-583-4323

## Appendix D

### Local Media

#### Newspapers

##### **Pueblo Chieftain**

825 West 6<sup>th</sup> Street  
Pueblo, CO 81003  
719-544-0006

##### **Hispania News**

PO Box 15116  
Colorado Springs, CO 80935  
719-540-0220

#### Radio Stations

##### **KCCY FM and KDZA FM**

106 West 24<sup>th</sup>  
Pueblo, CO 81003  
719-545-2080

##### **KNKN (Hispanic) 107.1 FM/KFEL 970 AM**

30 North Electronic Dive  
Pueblo, CO 81005  
719-547-0411

##### **KCSJ News Radio 590 AM, KYZX FM 104.5, & KGHF 1350 AM**

3305 North Elizabeth, Suite A  
Pueblo, CO 81003  
719-543-5900

##### **KRMX AM 690 (Hispanic)**

2829 Lowell Avenue  
Pueblo, CO 81003  
719-545-2884

#### Television Stations

##### **KKTV – Channel 11**

201 W. 8<sup>th</sup> Suite 460  
Pueblo CO 891003  
719-542-6247

##### **KOAA**

2200 7<sup>th</sup> Avenue  
Pueblo CO 81002  
719-544-5781

##### **KRDO AM/FM TV**

24 Club Manor Drive  
Pueblo CO 81008  
719-544-1312

##### **KTSC TV Rocky Mountain PBS**

2200 N Bonforte Blvd  
Pueblo CO 81001  
719-543-8800

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**Appendix E**

**COLORADO CITIZENS' ADVISORY COMMISSION MEMBERS  
March 23, 2005**

**Local Members**

Mr. John Klomp, Chairman  
1408 Torchey Way  
Pueblo, CO 81006-9758  
(H) 719-543-2043  
(Cell) 719-248-8346  
FAX: (719) 595-9824  
[Klomp@co.pueblo.co.us](mailto:Klomp@co.pueblo.co.us)

Anthony Nunez  
Pueblo County Commissioner  
215 W. 10<sup>th</sup> Street  
Pueblo, CO 81003  
(W) 719-583-6536  
(H) 719-543-6204  
FAX: 719-583-6549  
e-mail: [nunez@co.pueblo.co.us](mailto:nunez@co.pueblo.co.us)

Mr. Tom Enrietta  
Plumber & Steamfitters,  
Local 20  
2924 Graneros Lane  
Pueblo, CO 81005  
(H) 719-566-3889  
(W) 719-560-9100  
FAX: 719-560-9600  
e-mail: [tjoe75@hotmail.com](mailto:tjoe75@hotmail.com)

Ms. Irene Kornelly  
1602 Clemson Drive  
Colorado Springs, CO 80909  
(H) 719-591-5157  
FAX: 719-591-1305  
e-mail: [ikornelly@pcisys.net](mailto:ikornelly@pcisys.net)

Mr. Richard Robb  
91971 Robb Road  
P.O. Box 490  
Rye, CO 81069  
(H&F) 719-489-3855  
e-mail: [PATDIC@FONE.NET](mailto:PATDIC@FONE.NET)

Mr. John Thatcher  
1000 I.L. Road  
Boone, CO 81025  
(H) 719-947-3672  
(W) 719-542-4225  
FAX 719-947-3672  
e-mail: [thatlc@yahoo.com](mailto:thatlc@yahoo.com)

Mr. Ross Vincent  
Sierra Club  
PMB 300  
1829 S. Pueblo Boulevard  
Pueblo, CO 81005-2105  
(H & W) 719-561-3117  
Fax: 415-946-3442  
e-mail: [ross.vincent@sierraclub.org](mailto:ross.vincent@sierraclub.org)

**State Appointed Members**

John Marshall  
Governor's Office of Policy and Initiatives  
120 State Capitol Building  
Denver, CO 80203  
(W) 303-866-6380  
FAX: 303-866-6368  
e-mail: [John.Marshall@state.co.us](mailto:John.Marshall@state.co.us)

Ms. Joan Sowinski  
Federal Facilities Program Manager  
Hazardous Materials and Waste Management  
Division  
CO Dept of Public Health and Environment  
4300 Cherry Creek Drive S.  
Denver, CO 80246  
(W) 303-692-3359  
Toll Free: 1 (888) 569-1831 Ext. 3359  
FAX: 303-759-5355  
e-mail: [joan.sowinski@state.co.us](mailto:joan.sowinski@state.co.us)

## **Appendix F**

### **PAST AND PRESENT PUBLIC PARTICIPATION**

#### **AT PUEBLO CHEMICAL DEPOT**

Community involvement activities for facilities like the Depot typically include: community interviews, publication of a Plan, formation of a Restoration Advisory Board, establishment of a facility mailing list and public information repositories where citizens can access technical documents and other materials related to the Depot's programs, distribution of fact sheets, and public meetings and availability sessions, and hearings. The Depot's public participation program currently implements all of these activities and also publishes a regular newsletter. Depot tours were conducted on a routine basis until September 11, 2001. Due to security limitations, depot tours are no longer done routinely, but only on an as-needed basis.

An avenue for public participation with no oversight by the U.S. Army and relating to the ultimate disposal of the chemical weapons stockpile stored on the Depot is the Citizens' Advisory Commission for Chemical Demilitarization. Members of this commission hold monthly meetings open to the public to update the public and to gather public feedback on the chemical weapons stockpile disposal program.

The Chemical Stockpile Emergency Preparedness Program (CSEPP) complements the chemical stockpile disposal program to enhance protection of the civilian population during storage and disposal of the U.S. chemical weapons stockpile. The CSEP Program in Pueblo County has coordinated the Army, Federal Emergency Management Agency, and state and local government emergency preparedness programs since 1991.

Since 1991, the Depot has implemented a comprehensive Community Involvement Program outlined below. Some of the practices are current and some have been discontinued. Each item below is marked whether it is a past practice or ongoing.

- Community interviews conducted by the state health department and EPA in February 1991 and in 1998 to determine issues and concern related to the Depot (past practice).
- The Depot's original Public Involvement Plan prepared and issued by the state health department and EPA in 1992 and updated in April 2000 (past practice).
- Public meeting on environmental restoration first held in August 1993. Quarterly public meetings continued into April 1995, changing to semi-annual in October 1995, providing progress updates



on Depot programs, including environmental restoration, chemical disposal, and chemical stockpile emergency preparedness. Meetings are now held on a periodic, as-needed basis.

- *Environmental Monitor* newsletter first published and distributed to local residents in 1992 to inform the Pueblo community about depot environmental restoration activities. Newsletter continues to be published quarterly.
- CSEPP Newsletter (July 1995). Public continues to be published on a quarterly basis;
- *Reach* Newsletter started in February 1999. The title changed to *Exchange* in 2003 and continues to be published containing information about the chemical stockpile program.
- RAB formed in 1994 to solicit community input into ongoing environmental restoration projects. This is a continuing organization.
- Community interviews by the Depot, state health department, and EPA in March 1995 (past practice).
- Public Involvement Plan updated and revised as the Plan in 1995 and incorporated into the Permit (past practice).
- Production of several site-wide videos (past practice).
- Depot program representation at the 1996, 1997, 1998, 2002, and 2003 Colorado State Fair. This is a past practice and is evaluated each year to determine the benefit of having a booth for information.
- Community interviews by the Depot, the state health department, EPA, Colorado Office of Emergency Management, and Pueblo County Department of Public Safety and Operations in May 1998 (past practice).
- Depot-wide tours (discontinued as of September 11, 2001);
- The Depot Web Page. The depot no longer has a web page with extensive information provided. The depot web page was very active and contained a great deal of information prior to September 11, 2001. This outreach tool will be looked at in the future to determine if it would be appropriate to put back into place.
- Emergency Preparedness Calendar (on-going).
- The Depot, state and local government and Pueblo community participate in a nationwide study of chemical weapons stockpile communities (ongoing).
- Other ongoing community involvement activities implemented since 1991 includes preparation and issuance of news releases and fact sheets; responses to oral and written inquiries about installation

activities, media interviews; direction, coordination, and/or assistance with special activities, tours and briefings on the Depot for local and state officials and other interested citizens.

In October 1995, the Depot opened the Community Learning Center and Team Pueblo evolved in 1996. The facility was open to the public free of charge and was actively used until September 11, 2001. Team Pueblo was made up of work groups relating to education and training, business and industry, and wildlife management, recreation, and cultural resources. Team Pueblo no longer exists in its original form, but the team concept continues in all depot activities.

## Appendix G

### 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 EPA'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

EPA 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.