

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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

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Colorado Department
of Public Health
and Environment

June 18, 2004

Kathryn R. Cain
Chief, Environmental Management Division
Department of the Army
Pueblo Chemical Depot
45825 Highway 96 East
Pueblo, Colorado 81006-9330

Re: Environmental Assessment for the Transportation of Uncontaminated Dunnage and Uncontaminated, Stable Propellants for Off-site Treatment and Disposal

Dear Ms. Cain

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the Environmental Assessment for the Transportation of Uncontaminated Dunnage and Uncontaminated, Stable Propellants for Off-site Treatment and Disposal (the EA). The Division has prepared comments and questions to the EA for your consideration. These comments and questions are described in the attached Comments to EA.

If you have any questions or comments or would like to schedule a meeting to discuss our comments in more detail please contact me at (303) 692-3414.

Sincerely,

Doug Knappe
Manager
Pueblo Chemical Demilitarization Unit
Federal Facilities Program

ATTACHMENT: Attachment 1 – Comments to EA

cc: Kim Headley w/attachment, Pueblo County Planning and Development
 Gary Anderson w/attachment, US Army/ACWA
 Heather Maio w/attachment, Pueblo Health Department
 Division Record File PDI-5.8

Comments to EA

General Comments

1. The EA should provide a more complete characterization of the wastes to be managed and transported. Waste characterization data should be provided for both the wood and propellant. A chart delineating the specific types and quantities, associate weapon configurations, and explosive hazard or Department of Transportation classifications of the propellants in the Pueblo Chemical Depot (PCD) stockpile of chemical weapons should also be included in the EA. Do either of these waste streams carry any additional hazard waste codes or other classifications than just reactivity, and if so, do these hazards impact the risk estimated for the management and transportation of wastes evaluated under the EA. For example, does the wood dunnage possess any other hazardous constituents or possess a characteristic that may render it as a hazardous waste? Do any of the propellants to be managed and transported contain heavy metals in concentrations that may cause them to be characterized as a hazardous waste? How were any of these additional hazards associated with the wastes considered in the EA?

Specific Comments

1. Footnote 1 on Page 1 of the EA indicates that most of the wood has never been exposed to chemical agent and that any wood that has come into contact with mustard agent has been repacked. Identification of leaking waste munitions will be an on-going activity that is conducted throughout the storage and treatment of the chemical weapons at PCD. As required by 6 CCR 1007-3, Section 262.11, the determination of how much of the wood has been exposed to chemical agent will depend on proper waste characterization of the wood at the time the wood is processed at the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP). Future verification of this assumption will therefore be required.
2. Section 1.3 on page 2 of the EA indicates that the environmental consequences of moving materials to and from PCAPP would be virtually identical whether or not the materials were transported on the new access road (the Northwest Access Road) or not. In order to make this assumption, the EA should be supported by a traffic safety assessment of the existing access roads to the facility. In particular, the traffic safety assessment should evaluate the ingress of waste propellant transportation vehicles onto Highway 50 from PCD.
3. Paragraph 1, Section 2.1 on page 2 of the EA indicates that procedures for the testing of both the propellant and dunnage for chemical agent contamination will be developed and validated and states that "These procedures will be approved by the State of Colorado." To date, procedures for testing dunnage and propellant to determine agent presence and to determine propellant stability have not been provided to the Division. This statement in the EA should be modified to state "These procedures will require the approval of the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division prior to their implementation for the determination of agent presence and energetic stability."

4. Section 2.3 on page 3 of the EA states that RCRA Permitted TSDFs were considered for the disposal of the uncontaminated dunnage. The EA should explain why the uncontaminated dunnage might still be managed as hazardous waste (please also see General Comment 1).
5. Section 4.4 on page 7 of the EA describing air quality indicates that Colorado is currently in attainment for all criteria pollutants except for CO in Colorado Springs, Denver, Fort Collins, and Longmont, and for PM10 in Aspen, Canon City, Denver, Lamar, Pagosa Springs, Steamboat Springs, and Telluride. EPA has designated Colorado as "attainment" for all pollutants except that Lamar and Steamboat Springs have not officially been designated as attainment for PM10. The EA should be modified to indicate that Colorado is in attainment for all criteria pollutants except Lamar & Steamboat Springs for PM10.
6. Section 4.4 also indicates that the waste shipments would result in a negligible increase in pollutants from combustion of fossil fuel by the trucks and that particulates are primarily emitted from vehicular traffic on unpaved roads, agricultural activities and mining. The EA should also mention fugitive dust emissions from truck traffic on the roads and any other major pollutant sources in the Pueblo area. How were fugitive dust emissions from truck traffic considered in the EA?
7. Page 12 of the EA describes the 105-mm projectiles at PCD as configured with M1 propellant. This appears to be inconsistent with Table C-1-6 of the Phase 1 Hazardous Waste Permit Application for PCAPP, which shows that the 105-mm munitions at PCD are configured with M67 propellant. Please clarify this apparent discrepancy (also see General Comment 1 above).