

# State Perspective of DoD MMRP PA/SI Program



Colorado Department  
of Public Health  
and Environment



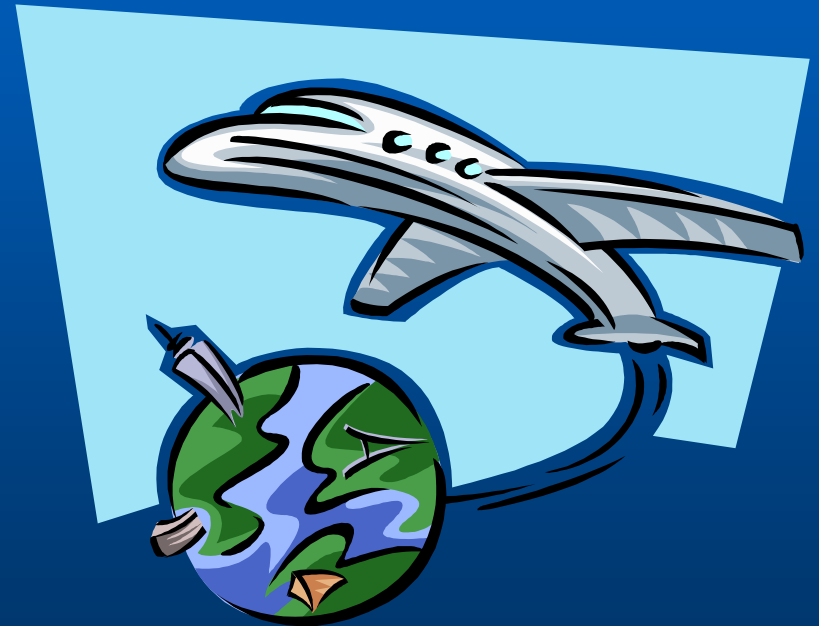
# Military Munitions PA/SI: Presentation Objectives

- Provide overview of Colorado's perspective
- Describe Colorado's expectations
- Show examples of success
- Highlight areas of concern



# Presentation Overview

- What are MEC
- How are MEC managed
- PA expectations
- SI expectations
- Case studies
- Summary





# What are MEC?

- RCRA Solid and Hazardous Waste
- 6CCR 1007-3  
Section 260.10 and  
Sections  
267.201/202
- Imminent and  
substantial  
endangerment





# How are MEC regulated?

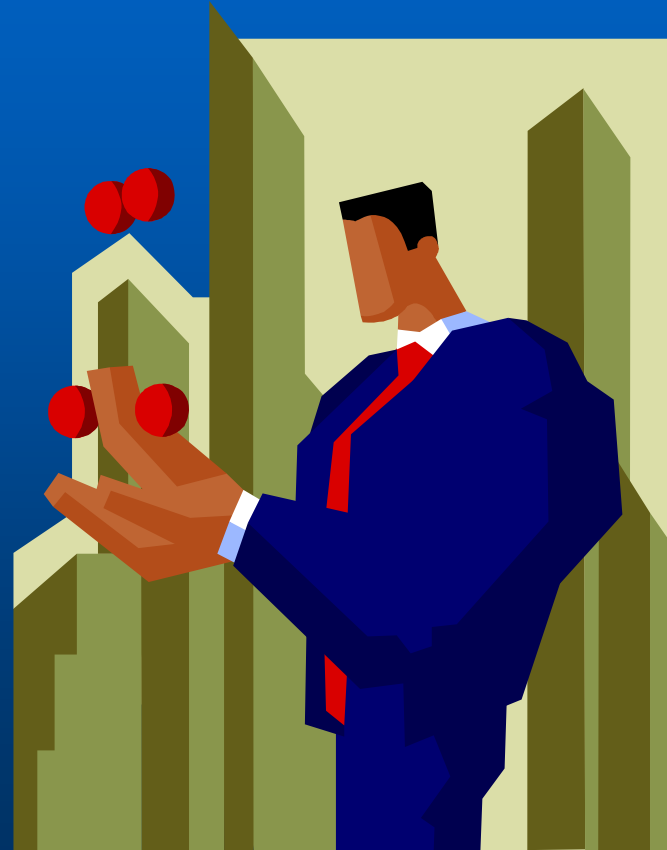
- Hazardous Materials and Waste Management Division (HMWMD)
- Authority to enforce and regulate MEC under:
  - Colorado Hazardous Waste Regulations
  - Colorado Solid Waste Regulations





# How are MEC managed?

- Cleanup usually follows CERCLA process
- Time Critical Removal Action
- Removal Action (EE/CA)
- Remedial Action (RI/FS)
- RCRA Corrective Authority







# Military Munitions

## Preliminary Assessment (PA)

### in Colorado

- Identify potential MEC and HTRW contaminated areas
- Early regulatory involvement is important
- Use systematic planning process
- Encourage public awareness



# Military Munitions PA in Colorado

- Uses historical information
- Uses anecdotal information, interviews
- Involves fence to fence site reconnaissance







# What are the outputs?

- Report and preliminary scoring
- Identifies areas requiring site inspection (SI)
- Identifies areas for No Further Action Planned
- HMWMD response
- Public awareness





# Military Munitions Site Inspection (SI) in Colorado

- Early regulatory involvement during planning
- Scoping meeting
- Systematic planning process
- Public awareness





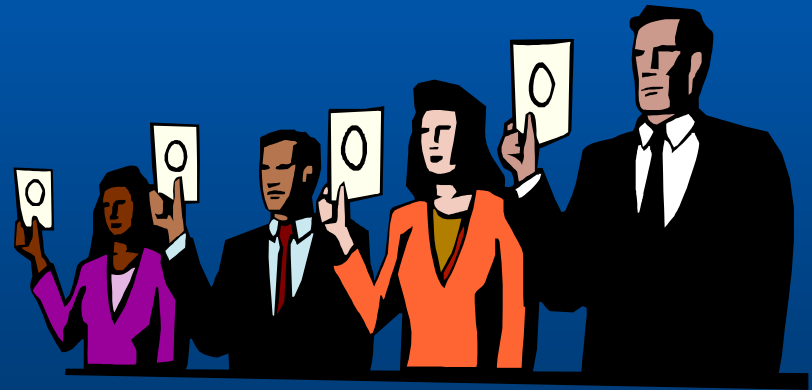
# Military Munitions SI in Colorado

- **Confirm PA**
- **Complete data gaps to score MRSPP**
- **Identifies TCRA**
- **Evaluates interim risk management**



# Site Inspection and Scoring

- Formerly RAC
- Munitions Response Site Prioritization Protocol (MRSPP)
- Will consider other scoring methods





# Site Inspection Tools

- Wide Area Assessment
- Geophysical survey
- Media sampling
- Encourage advanced technology





# Site Inspection Considerations

- Munitions type
- Potential receptors
- Future land use
- Interim Risk Management
- UFP QAPP or TPP







# What are the Outputs?

- Report
- Score
- HMWMD response
- Interim Risk Management Plan
- Public Awareness





# Summary of Expectations

- Early regulatory involvement in scoping and planning
- Systematic planning process
- Fence to fence coverage
- Use of advanced technology
- Interim risk management
- Public awareness



# Buckley Air Force Base

- Active base
- Comprehensive Site Evaluation Phase I
- Archival records review
- Interviews
- Fence to fence site reconnaissance
- Preliminary MRSPP





# Buckley Air Force Base

- Nine sites moved to CSE Phase II
- Refine MRSPP during Phase II
- NFA recommended for nine sites
- Preliminary MRSPP increased funding priority from FY10 to FY07



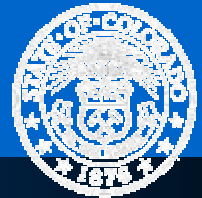


# Buckley Air Force Base

- CSE Phase II scoping involves regulatory agency
- Interim Risk Management in place (active base)
- Fact sheets published



# Camp Hale Tenth Mountain Division Training



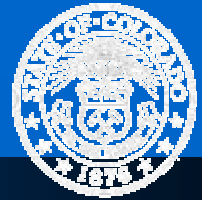
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- Army Corps of Engineers FUDS Policy ER-200-3-1 May 2004
- Limited state involvement in program development
- Forces reactive vs active participation





# Camp Hale Tenth Mountain Division Training



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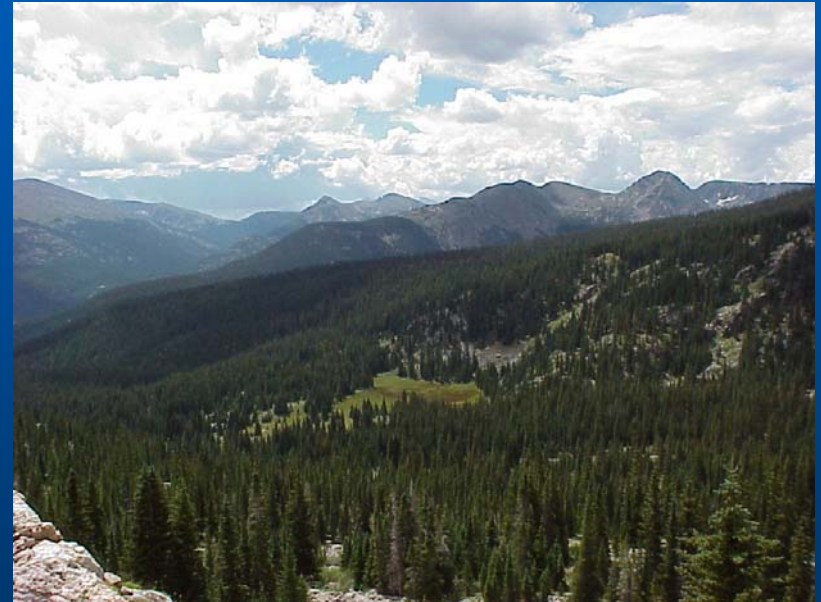
- State involvement does occur at project level
- PA applied to FUDS eligible portion only
- Limited site reconnaissance based on early assessments





# Camp Hale Tenth Mountain Division Training

- MRSPP scoring deferred to SI
- Advanced technology use limited
- Funding commitments unclear
- No interim risk management





# Summary

- MEC are solid and hazardous waste
- HMWMD regulates MEC under Colorado Hazardous Waste Regulations
- Early regulatory involvement in scoping and planning PA and SI is important
- Advanced technology highly encouraged
- Public awareness is needed
- Interim risk management is crucial



# Questions

