

US EPA ARCHIVE DOCUMENT

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Community Involvement and Communication Plan
Ball Aerospace & Technologies Corp.
Boulder Campus

Date: May 26, 2005
Supercedes: New Document

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INTRODUCTION

This document describes the Community Involvement and Communication Plan (CICP) for the Boulder Campus operations of Ball Aerospace & Technologies Corp. (BATC). The goals of this plan are as follows:

- Implement a successful communications strategy for the community interested in BATC operations related to the requirements of the Environmental Management System (EMS) permit.
- Maintain relationships with the public, BATC, the Colorado Department of Public Health and Environment (CDPHE), City of Boulder and other entities.

The Project Overview (page 4) portion of the CICP provides an overview of the Environmental Management System Permit Pilot Project. Also included in the CICP is company profile and location information (page 5), a site description (pages 5 – 6), information on surrounding properties (page 6) and BATC's environmental history (page 8). Finally, CICP objectives and information on dissemination methods are discussed on pages 10 – 14 of the plan. The appendix includes a list of contacts familiar with BATC operations and facilities.

PROJECT OVERVIEW

In August of 2004, the Colorado Department of Public Health and Environment (CDPHE) adopted regulations associated with the Environmental Management System Permit Pilot Program. Specifically, the EMS Permit Pilot Project establishes the requirements necessary for the development of a regulatory system that allows an EMS to act as a cross media permit for certain regulated entities.

The goals associated with the EMS Permit Pilot Project include:

- Utilizing an EMS to deliver compliance-equivalent performance through enforceable performance standards;
- Reliance upon an EMS with specific, CDPHE-approved performance improvement goals to raise environmental performance through continual environmental improvement;
- The use of an EMS to continue producing compliance and performance into the future;
- Continuation of CDPHE's selective policy that offers rewards to good performers who have used or want to add an EMS to their environmental management approach;
- The appropriate allowance for stakeholder involvement in a participant's environmental footprint, compliance history, and community relations situation;
- The consideration of cross-media impacts when making environmental decisions; and
- Finding ways to have the regulated organizations' EMS efforts replace and/or augment some of government's environmental regulatory functions, including inspections through external third-party audits, minor permit modifications through the EMS tracking system, and reporting through the EMS data collection, problem identification, root cause analysis, system modification, etc. processes.

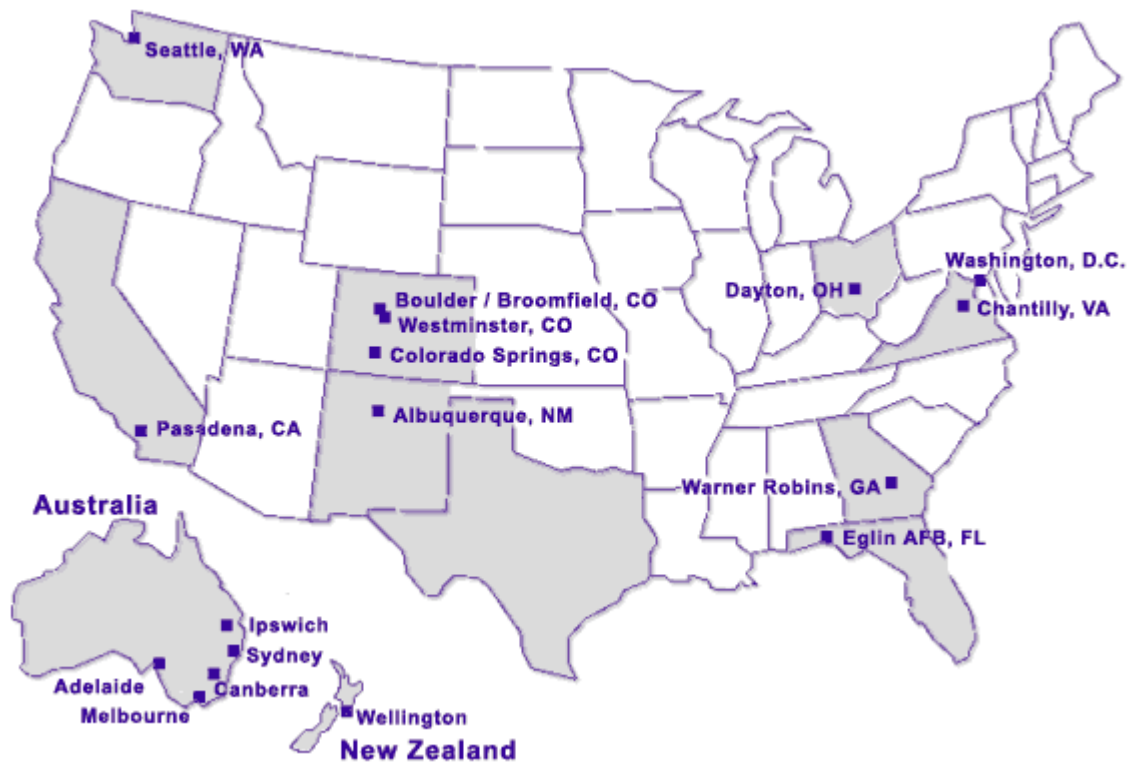
BATC became one of the facilities selected to participate in the EMS Permit Pilot Project in 2004. BATC's participation assists CDPHE with meeting their goal of having three to five facilities across various sectors and trades in Colorado in the Pilot Project.

Company Profile and Location

Ball Aerospace & Technologies Corp.'s vision is to be a global leader providing advanced imaging, communications, and information solutions to the government and commercial aerospace markets.

BATC conducts domestic and international business in the defense, civil space, and commercial arenas, providing best value and innovative solutions. BATC supports national policy-makers, the military services, NASA, and other U.S. government agencies, as well as numerous aerospace industry allies.

The illustration below demonstrates the locations of BATC's operations.



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For the EMS Pilot Program, the only facilities that will be included are BATC's Boulder Campus.

Site Description

BATC's Boulder Campus is located between 48th and 55th Streets, and Boulder Creek to Arapahoe Avenue in Boulder, Colorado. It is located in an area known as the Boulder Industrial Park, which includes other commercial entities.

The Boulder Campus consists of several buildings, some of which are owned by BATC and others that are leased from various property owners. Operations in the facilities on the Boulder Campus include administration, support organizations operations (e.g., Procurement, Mission Assurance, Environmental, Health and Safety, etc.), research and development, engineering, manufacturing, integration and test of aerospace systems and components.

Surrounding Properties

North – The Boulder Campus is bordered on the north by other commercial entities and ultimately, Boulder Creek

South – The Boulder Campus is bordered by other commercial entities and ultimately, Arapahoe Avenue

West – The Boulder Campus is bordered by 48th Street. Boulder Community Hospital’s Foothills Hospital facility is located on the west side on 48th Street.

East – The Boulder Campus is bordered by other commercial entities and ultimately, 55th Street.

The map on the next page details that location of the buildings that make up the Boulder Campus.



Environmental History

BATC has always had an excellent environmental history at the Boulder Campus location. Although BATC uses materials that create hazardous waste, air emissions, wastewater effluent, etc., these materials have been managed in a manner that minimizes the potential for spills and other uncontrolled releases to the environment. BATC's management systems have been very successful.

As a part of BATC's environmental management system, there are training components and inspection/audit requirements that monitor program effectiveness. In addition, BATC utilizes a stringent hazardous material purchasing regimen that requires environmental, health and safety review and approval prior to purchase. This procedure has provided a mechanism for eliminating or significantly reducing materials that have unacceptable impacts on employee health and safety and/or on the environment.

As a result of BATC's environmental management programs, BATC was one of four companies that were the charter members in the State of Colorado's Environmental Leadership Program. BATC, along with Lockheed Martin Astronautics, Majestic Metals, Inc. and Swiss Lenox became official members of the Environmental Leadership Program (ELP) in November of 1999. BATC continues to participate in this program which recognizes entities that go beyond environmental compliance requirements.

In support of ELP, BATC had to prepare an extensive application that described BATC's EMS program. After the application was accepted by CDPHE, it was submitted for thirty-day public review so that anyone that was interested could comment on the application and/or other pertinent information. This process again demonstrates BATC's and CDPHE's commitment to including stakeholders in the process.

The following table summarizes the permits, EPA Identification Numbers, etc. associated with BATC's Boulder Campus.

BATC Boulder Campus Environmental Permit Summary

Permit:	Description:	Regulatory Agency:	Renewal Frequency:	Requirements included in Pilot EMS Permit?
Wastewater discharge permit	This permit regulates industrial wastewater discharges. BATC is required to periodically sample wastewater and perform analyses for certain parameters and report the findings.	City of Boulder	Every 5 years	Yes
Air Permit – Synthetic Minor	The air permit regulates air emissions (and sources) from several locations on the Boulder Campus. Regulated substances include criteria pollutants (nitrogen oxide, sulfur dioxide, carbon monoxide, particulate, volatile organic compounds, etc.) and hazardous air pollutants.	Environmental Protection Agency Colorado Department of Public Health and Environment Boulder County	Every 5 years a revise Air Pollution Emission Notice is required	Yes
Stormwater Permit	Regulates runoff from facility production areas, parking lots, roof tops, etc. that come in contact with stormwater and may contain regulated contaminants.	Environmental Protection Agency Colorado Department of Public Health and Environment	Every 5 years	Yes

EPA Identification Numbers:	Site Address:	Generator Status:
COD085270270	1600 Commerce Street	Large Quantity Generator
COD983800095	1735 Range Street	Conditionally Exempt Small Quantity Generator
COD983785296	1685 Conestoga Street	Conditionally Exempt Small Quantity Generator
COD983800103	5490 Western Avenue	Conditionally Exempt Small Quantity Generator
COR000202945	1730 Conestoga Street	Conditionally Exempt Small Quantity Generator

OBJECTIVES OF THE CICP

The CICP summarizes BATC's program for communicating with the community and other interested entities. The overriding objective of the CICP is to provide effective two-way communications between BATC and interested entities.

The objectives for the BATC CICP are to:

- Ensure that the public understands that their input is important to BATC.
- Provide information on how to access information that keeps local residents and other interested parties informed of BATC activities, etc.
- Provide a mechanism for interested parties to submit questions, concerns, information needs, etc. to BATC.
- Effectively serve interested party's information needs through various dissemination techniques.
- Create and maintain a climate of understanding and trust by providing information and opportunities for comments and discussion.

CICP INFORMATION DISSEMINATION METHODS

BATC utilizes the following methods for disseminating information related to operations, etc.:

- BATC's External Website

BATC's External Website is located at the following location:

<http://www.ball.com/aerospace/index.html>

The website includes information on BATC Programs (highlights of BATC's major accomplishments, past and present), Products (current information on BATC hardware and software products), Profile (BATC's heritage, tradition and values), Careers (job opportunities, college recruiting and internships), Newsroom (latest news and current events related to BATC), and provides a method for submitting questions or requests for information related to BATC and/or Ball Corporation.

- Boulder County Local Emergency Planning Committee (LEPC)

BATC is a member of Boulder County's LEPC. As such, BATC participates in county wide emergency planning activities on a routine basis. The LEPC is comprised of Boulder County emergency management personnel, first responders (fire and police), media, medical providers, industry representatives, wastewater program representatives and interested members of the public. The LEPC meets on a routine basis. In addition, each year, a county wide Emergency Operations Plan is prepared and submitted. This plan includes input from facilities that have hazardous materials. BATC is one of the industries that provide this input.

The LEPC also acts as liaison for interested parties and the members of the LEPC. Specific facility information can be requested through the LEPC.

- Superfund Amendments and Reauthorization Act (SARA) Reports

On an annual basis, BATC is required to identify and quantify all hazardous materials and determine if any of them meet the reporting thresholds outlined in SARA provisions. If the material exceeds the reporting threshold, BATC is required to complete and submit a Tier II report that provides facility information, identity of the material, Chemical Abstract System (CAS) number, the physical form of the material, whether it is a mixture or in pure form, quantity of the material on site at any given time, how and where the material is stored. This report is then submitted to the LEPC, local fire jurisdiction and to the Colorado Department of Public Health and Environment. These reports are stored at the Norland Library in Boulder for public access.

- Ball Corporation Annual Report

BATC is a wholly owned subsidiary of Ball Corporation. Ball Corporation prepares an annual report, which is available on the website. This report provides detailed information on BATC as well. The Ball Corporation website is located at:

<http://www.ball.com>

- Annual Report To Boulder

For many years, BATC has been preparing and submitting information to the City of Boulder related to hazardous waste generation, air emissions, recycling activities, pollution prevention and waste minimization activities. This includes the creation of pollution prevention goals and a summary of the status of these goals. Recently, information on energy and water use was added. This report is submitted to the City and has, in past years, been presented in a public forum via the Boulder City Council's Environmental Advisory Board. The reports are also peer reviewed by a third party. This report is available to the public and comments, questions, etc. are welcomed.

- Climate Leaders

Ball Corporation (including BATC) is a participant in the EPA's Climate Leaders Program. The main objective of this program is to voluntarily reduce greenhouse gas emissions at all Ball Corporation facilities and operations. As a participant of this program, BATC and Ball Corporation have prepared detailed information on energy and material use. An annual goal for reduction is then set and strategies are implemented to achieve these goals. Much of the information that is being prepared and submitted for this program are public record and are available through the EPA.

- Hazardous Waste Commission and Colorado State Board of Health

BATC participates on the Hazardous Waste Commission and the State Board of Health. For both organizations, BATC has representatives that have been appointed by the Governor and confirmed by the Colorado Senate to serve on these organizations, which establish regulations.

- Internal Communications with Employees

BATC has a number of mechanisms for communicating with internal employees. These include an internal newsletter, all hands e-mail transmissions and an internal website for Environmental, Health and Safety (EHS). Information on environmental performance, health and safety performance statistics, employee alerts and other information is communicated by using the appropriate internal

mechanism. The EHS website also provides a method for submitting questions, suggestions, etc. to EHS personnel.

- Customer Requirements

Many of BATC's customers now require that BATC prepare and submit Hazardous Materials Management Plans and/or Safety and Health Plans. These plans provide information on materials that BATC uses, material storage and management, Environmental, Health and Safety department organization and function, as well as information on permits, reporting, etc. Requirements for preparing, submitting and implementing these plans demonstrates that BATC's customers are also concerned with safe handling and storage of hazardous materials.

- Toxic Substances Control Act (TSCA) Requirements

The provisions of TSCA require that BATC investigate any allegations of adverse reaction if an individual believes that a chemical substance, mixture, article, operation, process, or waste from a BATC site has caused harm (or adverse effect) to them, another person, or the environment.

Allegations can be submitted by BATC employees, consumers, customers, plant neighbors, relatives of a deceased or injured employee, medical personnel on behalf of their patients, union representatives, or other companies and/or their employees.

In addition, TSCA mandates that any person (entity) who manufactures, imports, processes, or distributes in commerce a chemical substance or mixture and who obtains new information that reasonably supports the conclusion the substance or mixture presents a substantial risk of harm to human health or the environment shall notify EPA, in writing, of the substantial risk within 15 days of obtaining the information. This pertains to all chemicals, including but not limited to, research and development chemicals, laboratory reagents, chemicals for export only, byproducts, and impurities. TSCA requires that EPA be notified (by phone) within 24 hours if there is a release of such a chemical substance to the environment. A follow-up written report is required to be submitted to EPA 15 days.

The techniques identified in this section of the CICP provide methods for BATC to communicate information to the community, employees and other interested parties. In addition, the website provides a method for interested parties to submit questions or information requests to BATC. This can also be accomplished through other means such as the LEPC or City of Boulder.

Public Advisory Group:

The Public Advisory Group, or PAG, will be established as required by the Environmental Management System Permit Pilot Program regulations. Through the PAG, interested parties will have the opportunity, as deemed appropriate by BATC and CDPHE, to take an advisory role in the evaluation, analysis and discussion of the EMS Permit Pilot Program. BATC will consider recommendations from the PAG when determining how information will be distributed. Members of the PAG will be selected to provide a meaningful and varied cross section of interested neighbors to BATC.

Potential Members of the PAG:

Renaud Des Rosiers
University of Colorado Student
303-443-0541
renaud@colorado.edu

Tonya R. Fernando, CSP
EHS Consultant, Colorado (working at Hewlett Packard)
3404 East Harmony Road, ms60
Fort Collins, CO 80528
(970) 898-0931
tonya.fernando@hp.com

Pam Milmoe
Environmental Health Division
Boulder County Health
3450 Broadway
Boulder, CO 80304
303-441-1189
pmilmoe@co.boulder.co.us

John Tayer
Community Relations Manager
Roche Colorado
2075 North 55th Street
Boulder, Colorado 80301
(303) 442-1926
John.Tayer@roche.com

Jim Raymond
Boulder Office of Emergency Management (and chairman of the Boulder County Local Emergency
Planning Committee)
303-441-3637
jraymond@co.boulder.co.us

Dave Lowrey
Boulder Fire Department
1805 33rd Street
Boulder, CO 80301
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lowreyd@ci.boulder.co.us

APPENDIX A

CONTACTS

BATC Site Contact	Laura Davis Director of Environmental, Health and Safety	(303) 533-7095
Alternate BATC Site Contact	Lynn Laszewski Environmental Manager	(303) 533-7413
Ball Corporation Environmental Services	Joette Bailey-Keown	(303) 460-5433
Environmental Protection Agency – Region VIII	Regional Administrator’s Office	(303) 312-6312
Colorado Department of Public Health and Environment – Sustainability Program	Jill Cooper	(303) 692-2007
Colorado Department of Public Health and Environment – Air Permit Engineer	Matt Burgett	(303) 692-3183
Colorado Department of Public Health and Environment – Water Quality Control Division (Stormwater)	Susan Nachtrieb	(303) 692-3510
City of Boulder - Water Quality and Environmental Services	Ridge Dorsey	(303) 413-7361
Boulder County Local Emergency Planning Committee	Sgt. Larry Stern	(303) 441-3390
Clean Harbors 4770 Fox Street Denver, CO 80216-1840	Mary Feeley	(303) 293-2500
Boulder Community Hospital – Foothills 4747 Arapahoe Avenue Boulder, CO 80303-1133		(720) 854-7000
Boulder Fire Department		(303) 441-3350
Boulder Police Department		(303) 441-3333
Arbor Occupational Medicine 2995 Baseline, Suite 310 Boulder, CO 80303		(303) 443-0496