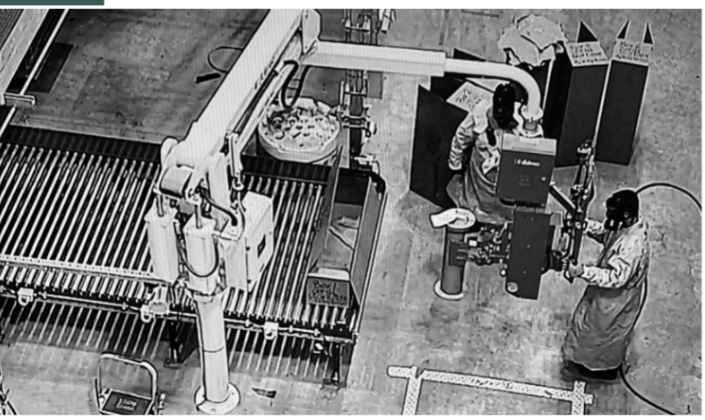
Status of the Hazardous Waste Program in Colorado

2024

Hazardous Materials and Waste Management Division
February 1, 2025



COLORADO
Department of Public Health & Environment

Table of contents

Executive summary

In state fiscal year 2024, the Hazardous Waste Program (the program) within the Hazardous Materials and Waste Management Division (the division) of the Colorado Department of Public Health and Environment (the department) continued successful implementation of its core mission, to ensure compliance with hazardous waste laws and regulations. The program also continued to implement environmental justice goals related to compliance inspections and enforcement in disproportionately impacted communities, established under a March 2022 Memorandum of Understanding between the department and the U.S. Environmental Protection Agency (the EPA).

The Hazardous Waste Program currently consists of **26 staff** and managers in three units:

- Compliance Assurance Unit
- Corrective Action Unit
- Permitting Unit

In state fiscal year 2024, the program's Permitting Unit processed numerous permit modifications for the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP, or main plant) and three static detonation chambers previously used for the treatment of munitions containing mustard chemical warfare agent, a hazardous waste, at the Pueblo Chemical Depot. Significant PCAPP permit modifications included early disassembly to support workforce retention, a revised closure plan for the main plant, and modifications to incorporate operational changes resulting from closure activities. The Permitting Unit also approved a Pueblo Chemical Depot permit modification to incorporate a revised closure plan for closure of permitted munitions storage igloos and continues to work towards approval of the final static detonation chamber closure plan.

The program's Corrective Action Unit continued its active oversight of sites that have had a release(s) of hazardous waste into the environment. In addition, the Corrective Action Unit continues to be involved with a number of contaminated properties subject to ownership transfer and/or redevelopment, which often offers opportunities to clean up contamination that was previously inaccessible. Program involvement at contaminated redevelopment sites ensures the public will not be exposed to historical contamination that may remain in place, or if disturbed, ensures that the material is safely and properly managed.

The Compliance Assurance Unit continued to conduct inspections at hazardous waste management facilities, identifying a number of facilities with hazardous waste compliance issues. Compliance issues resulting from a high rate of staff turnover or short staffing at the regulated facilities continue to be an issue. In addition, the review of hazardous waste shipping data in EPA's e-Manifest system continues to drive inspections related to facilities failing to provide proper notification of their hazardous waste activity and failing to follow required waste management procedures. The Compliance Assurance Unit also continued developing and enhancing its hazardous waste generator training. More than 640 people attended the program's September 2024 training, which included an in-person session for the first time since 2019.

In February 2024, the Solid and Hazardous Waste Commission adopted amendments to Part 267, Subpart Q, of the Colorado Hazardous Waste Regulations pertaining to Class B firefighting foam containing intentionally added per- and polyfluoroalkyl substances (PFAS). The amendments updated regulatory requirements to reflect existing statutory requirements applicable to entities that store or use PFAS-containing firefighting foam. The amendments expand the applicability of use restrictions, capture requirements, and storage requirements and added self-certification and spill reporting requirements. The rulemaking followed an extensive stakeholder process involving entities subject to the rule, including airports, airlines, fire departments, and petroleum industry representatives.

314	facilities inspected this year	367	institutional controls in place (51 hazardous waste facilities)	642	total participants at the annual Hazardous Waste Regulations training

Hazardous Waste Program background

Colorado's Hazardous Waste Program is responsible for ensuring compliance with statutes and regulations pertaining to the management of hazardous waste. The authority for this program is in the Colorado Hazardous Waste Act, 25-15-101 et seq., C.R.S., and the federal Resource Conservation and Recovery Act (RCRA). The EPA authorized Colorado to implement the federal program requirements, and by doing so, the authority to implement requirements for the management of hazardous waste in Colorado rests primarily with the state. The EPA authorized Colorado for the base hazardous waste regulatory program in November 1984. In July 1989, federal authorization was granted to Colorado for significant additions to the base program, including authority for hazardous waste corrective action, which provided authority to investigate and clean up releases of hazardous waste constituents into the soil, surface water, and groundwater at hazardous waste facilities.

Primary elements of the program include compliance assistance, compliance monitoring and enforcement, corrective action, and permitting. Each of these program elements are discussed in the following sections. In addition, this report includes sections discussing ongoing program authorization by EPA and the status of program funding.

As of October 2024, the program regulates six active and permitted treatment, storage, and/or disposal facilities (TSDs), and 15 closed TSDs, with hazardous waste remaining buried onsite that requires post-closure monitoring and/or maintenance. In addition, the program regulates approximately 130 large-quantity generators, 560 small-quantity generators, 70 transporters, and 4,625 very small quantity generators of hazardous waste. The program also regulates more than 200 facilities at which corrective action (remediation of environmental contamination) is required.

Maintaining authorization

One of the key values held by the regulated community, and one of the legislative directives from Senate Bill (SB) 00-177, is that Colorado "maintains program authorization by the federal government." When the EPA authorizes a state for the hazardous waste program, it carefully reviews two aspects of the state program:

1. The state's statutory authorities, funding, and staffing, both quantitatively and qualitatively, and;
2. The state's regulations.

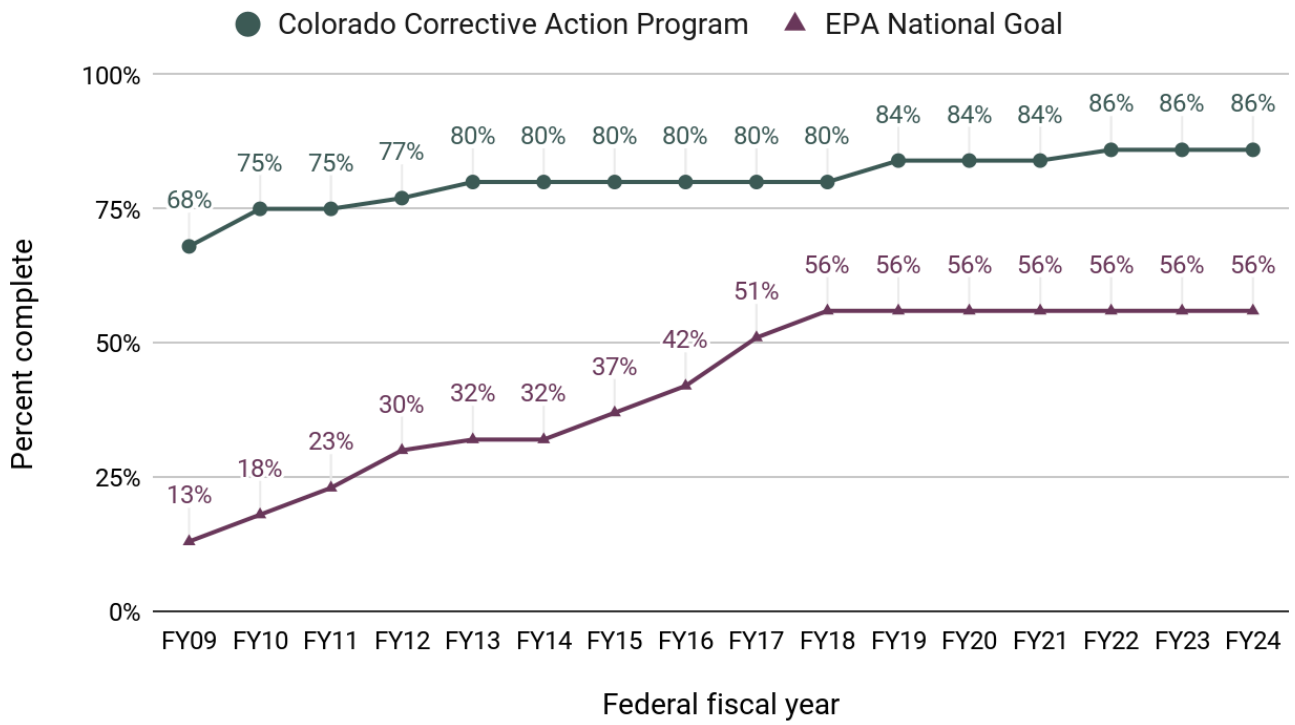
Once a state is authorized, EPA monitors the state program, to ensure it is being implemented in a manner that satisfies federal program requirements.

To measure corrective action effectiveness, the EPA established four national environmental indicators that measure hazardous waste corrective action program progress: 1) Human exposures under control, 2) Ground water releases under control, 3) Remedy construction, and 4) Corrective action completeness. The EPA

established a national goal for each measure in federal fiscal year (FFY) 2006 for a group of high-priority facilities across the country, referred to as the 2020 Corrective Action Baseline; EPA updated these goals in FFY 2009. There are 44 facilities in Colorado included on the 2020 Corrective Action Baseline. Human exposures were under control at 100 percent of Colorado's 2020 baseline facilities starting in FFY 2013, and 100 percent of groundwater releases were under control at Colorado's 2020 baseline facilities starting in FFY 2015. However, due to the discovery of PFAS at the Suncor refinery, EPA requested that the human exposures and groundwater releases measure determinations for this facility be changed, until the extent of PFAS is fully defined and under control. As a result, 98 percent of Colorado's 2020 Corrective Action Baseline facilities currently meet the human exposures controlled and groundwater releases controlled criteria.

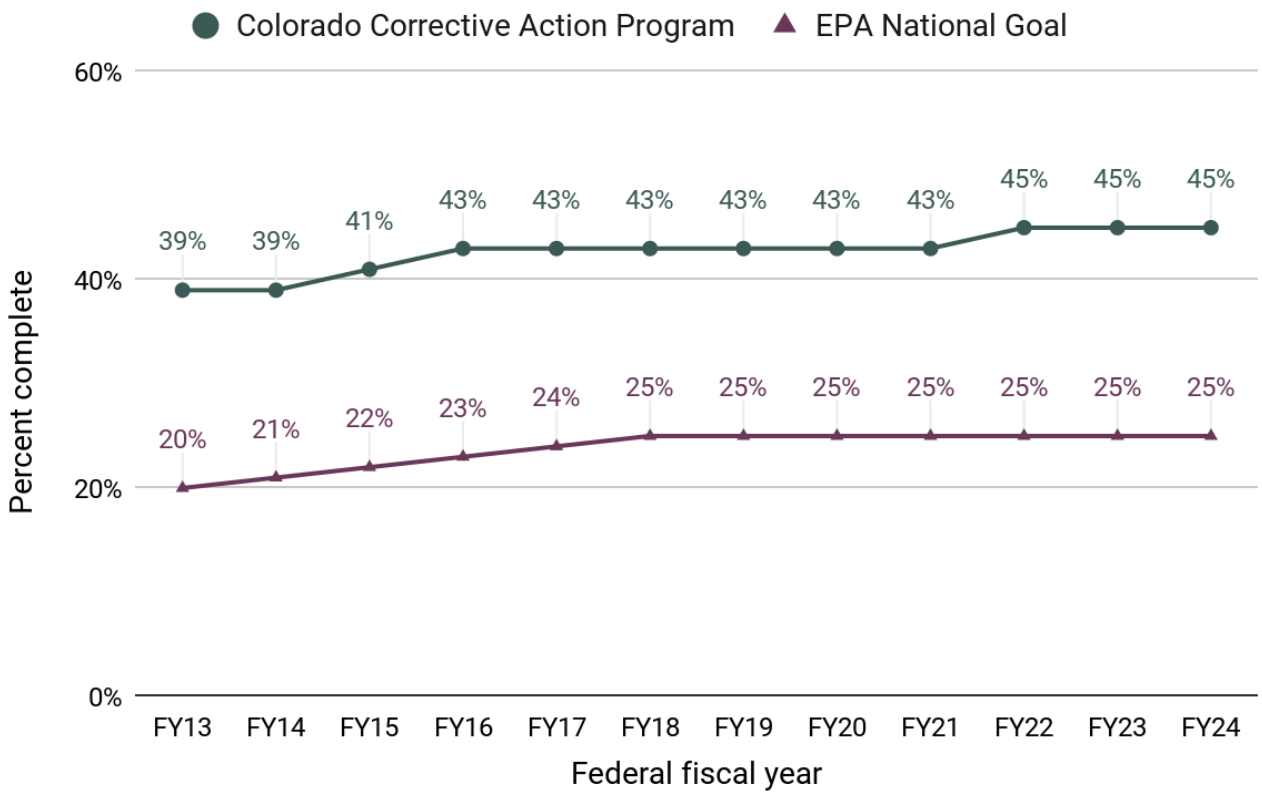
EPA developed new goals for 2030, including "Ready for anticipated use" but has not established specific measurement criteria. Colorado currently has 50 facilities included in the 2030 baseline, with "Ready for anticipated use" already achieved at 30 of those facilities. Figures 1 and 2 show Colorado's progress on remedy construction and corrective action completeness, based on the 2020 baseline goals.

Figure 1. Remedy constructed - CA550 (EPA 2020 baseline)



Remedy construction achieved at 38 out of 44 (86%) of Government Performance Results Act 2020 baseline facilities. Remedy construction achieved at 40 of 50 (80%) of CAPTrack facilities.

Figure 2. Corrective action complete - CA999 (EPA 2020 baseline)



Inspections

Facility inspections are one tool the program uses to ensure hazardous waste facilities are in compliance with state laws. In FFY 2024, the program completed 314 inspections across all facility types: 84 inspections at large quantity generators and permitted TSD facilities; 32 inspections at small quantity generators; 53 inspections at very small quantity generators; and 145 other facilities that were not listed as hazardous waste generators. This year, the Compliance Assurance Unit focused on the hazardous waste transporter/transfer facility sector, inspecting 31 facilities. Of these transporter/transfer facilities, four were large quantity generators and four were very small quantity generators.

Colorado statute requires that active hazardous waste land disposal facilities be inspected monthly. In addition, all federal and state TSDs are inspected every year, as well as 20 percent of large quantity generators, in accordance with the state and EPA Performance Partnership Agreement. The program met these requirements in FFY 2024. The total number of inspections for state fiscal year (SFY) 2024 increased slightly from the previous year, although the number of full-time lead inspectors decreased due to a vacancy, resulting in an overall increase in the number of inspections per full-time lead inspector. On average, the program completed 16 inspections for each full-time lead inspector per quarter in SFY 2024.

Inspections also carry administrative responsibilities, such as report preparation, tracking return-to-compliance activities, and data entry. In FFY 2024, all Compliance Assurance Unit inspectors performed these administrative tasks within the required timeframes. Inspections can also result in the issuance of formal and informal enforcement actions. The majority of formal enforcement actions

(compliance orders) and 100 percent of informal enforcement actions (compliance advisories) issued by the Compliance Assurance Unit were timely in FFY 2024, as measured against standards established by EPA and adopted by the Colorado program. The delay noted in formal enforcement actions was due to extended negotiations associated with three settlement agreements and legal complications associated with one unilateral order. All inspection reports become public documents and are available through our online environmental records database.

Figure 3. Inspector efficiency

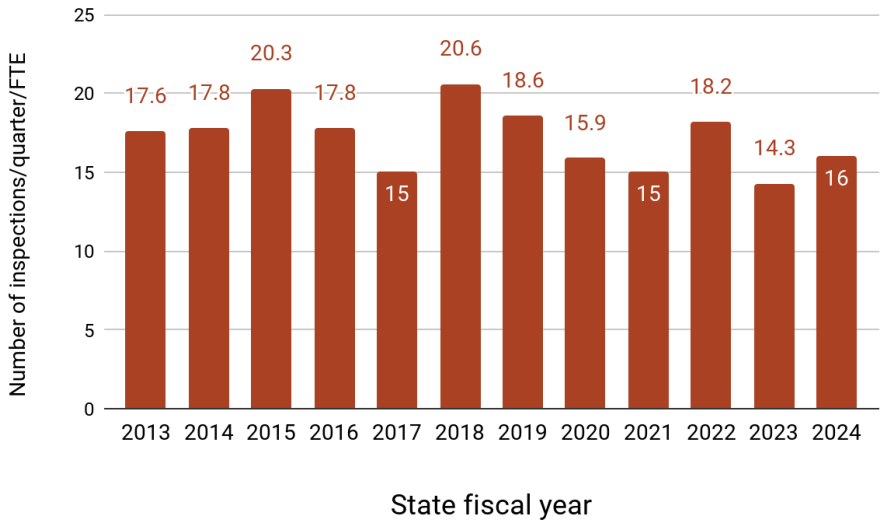


Figure 3 shows the average number of inspections performed by each inspector per calendar quarter. The performance plans for each inspector define the number of completed inspections needed to achieve an outstanding, satisfactory or unsatisfactory performance rating. To perform at a sustainable level, experienced inspectors are expected to conduct 15 inspections per calendar quarter, and 18 per quarter for an outstanding rating in this aspect of their job duties. This standard prevents staff burn-out, but also allows the program to adequately inspect the regulated universe.

Common violations seen on inspections

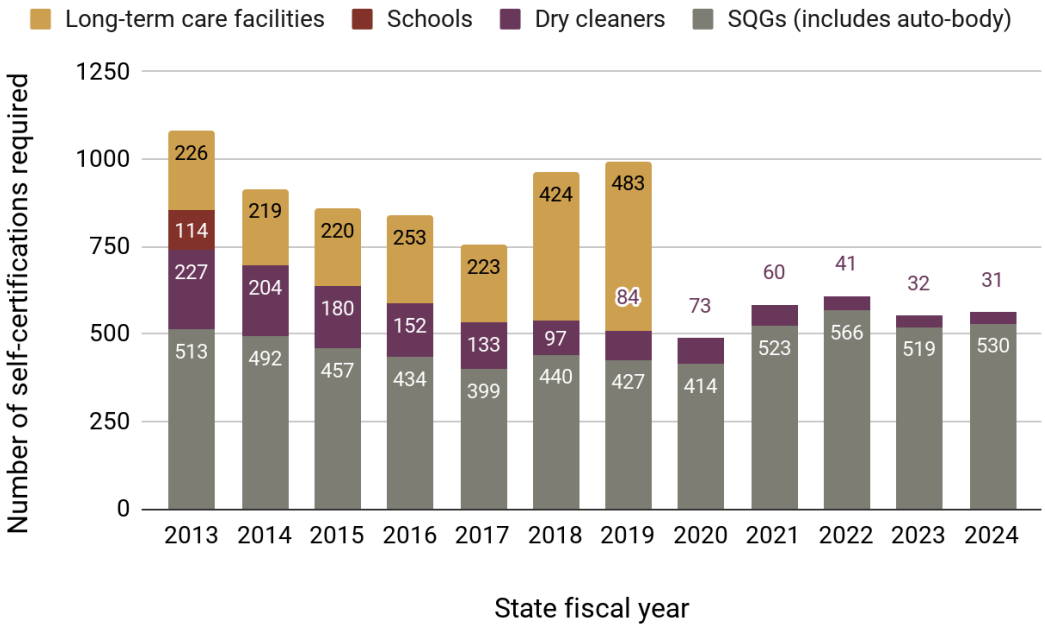
1. Lack of training and training documentation for employees handling hazardous waste.
2. Failure to label satellite accumulation area containers with the words "Hazardous waste" and the indication of the hazard(s) posed by the contents.
3. Failure to make a hazardous waste determination and maintain documentation of hazardous waste determinations.

Self-certification

The Hazardous Waste Program initially created the self-certification program in 2005, to allow dry cleaning facilities to audit their own waste management, submitting annual checklists as documentation to the department. After launching the program, there was a quick decrease in violations. The program was

expanded to include small quantity generator facilities in 2006 and long-term care facilities in 2013. Similar improvements were realized, as the self-certification checklist walks the facility through a typical inspection and provides additional waste management guidance. Figure 4 illustrates the self-certifications required by facility type.

Figure 4. Self-certification program



As Figure 4 shows, the number of dry cleaners in the self-certification program has continued to decrease over the years as facilities switch from perchloroethylene to alternative chemicals that do not create hazardous waste.

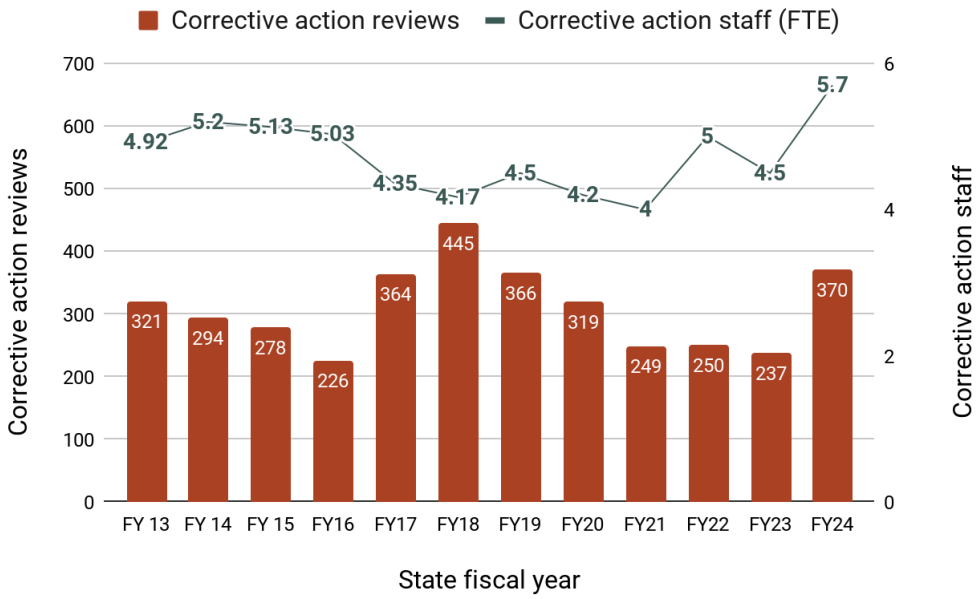
Beginning in SFY 2020, the self-certification program at healthcare facilities was discontinued, due to a new pharmaceutical rule. This rule makes it easier for healthcare facilities to manage their wastes, allowing the program to ensure that waste pharmaceuticals generated are properly disposed of and managed.

Corrective action

Corrective action, which is the environmental investigation and clean-up portion of the Hazardous Waste Program, continues to be a substantial part of the program's workload. Corrective action staff oversee the environmental investigation and cleanup of more than 200 individual facilities ranging in size from large facilities, such as Rocky Flats and EVRAZ, to very small facilities, like neighborhood dry cleaners and plating shops.

As an alternative to the resource-intensive options of a hazardous waste permit or compliance order, the program typically uses Corrective Action Plans to initiate corrective action at facilities, without the need for extensive enforcement. This is a popular mechanism for facilities, and while entered into voluntarily, Corrective Action Plans are enforceable as special permits under the hazardous waste regulations. This year, reviewing a simple Corrective Action Plan required 13 hours over 27 days to complete, on average. This is slightly above the target of 10 hours, but slightly below the goal of 30 days. Staff processed a complex Corrective Action Plan in approximately 16.25 hours over 62.8 days in SFY 2024. This is well below the division's goal of 40 hours, and slightly above the division's goal of 60 days. As shown in Figure 5, the Corrective Action Unit staff reviewed a total of 370 documents during SFY 2024.

Figure 5. Corrective action reviews and staff levels



The program continued to be productive in completing corrective action reviews this year. Staff completed 64 reviews per full time employee in FY24, compared to 53 reviews per employee in FY23 and 50 reviews per employee in FY22.

In SFY 2024, the Corrective Action Unit continued to address a number of property sales and redevelopment proposals occurring at hazardous waste sites where complete remediation of the property has not yet been achieved. These redevelopment activities are typically associated with the demolition and construction of new buildings and reconfiguring sites for a new land use. The Corrective Action Unit uses these redevelopment activities as an opportunity to compel additional remediation of soil and groundwater in areas that were previously inaccessible. Ultimately, redevelopment of these sites enhances economic development and results in a cleaner property. This was previously highlighted by EPA in its profile of the economic benefits of several remediation and redevelopment projects conducted at the Denver Federal Center, overseen by the Corrective Action Unit.

Redevelopment project at a former orthodontics manufacturing facility resulting in the excavation of contaminated soil and additional groundwater remediation.

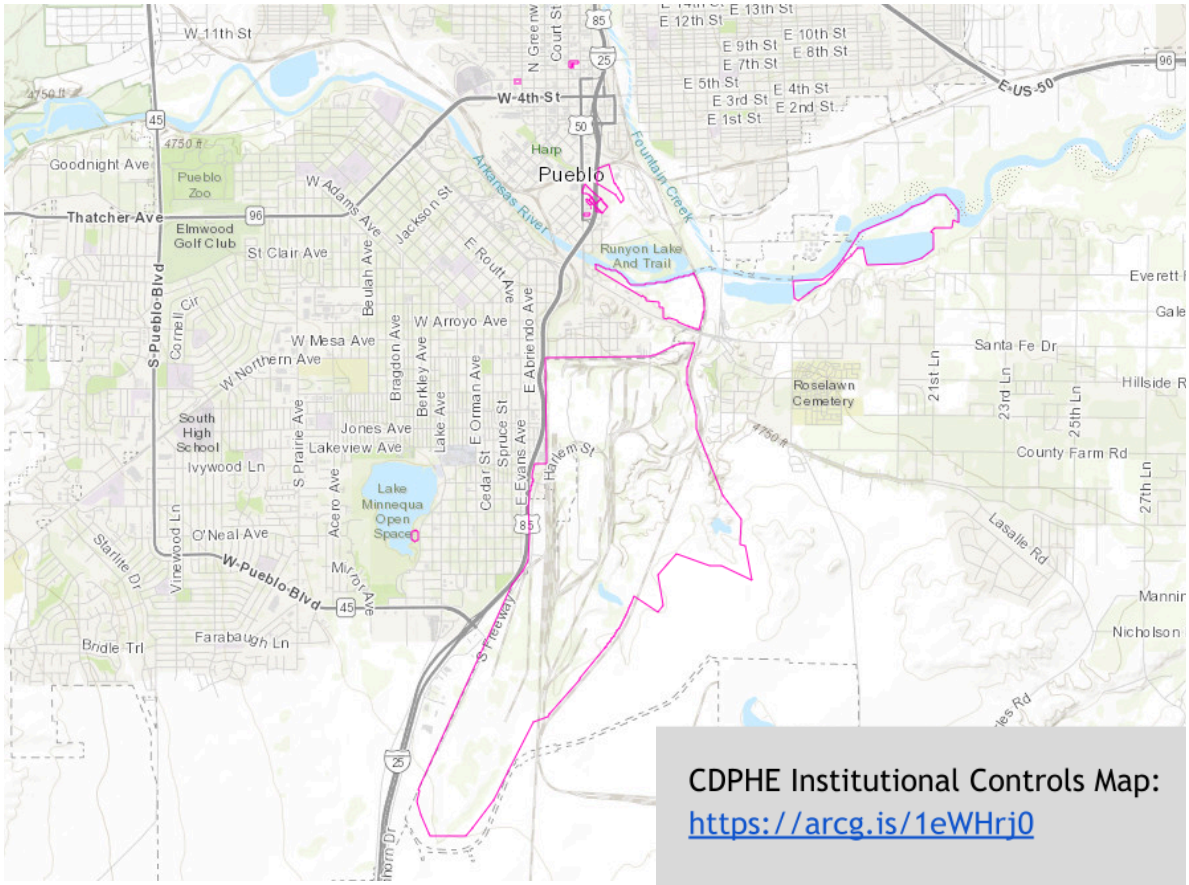
Environmental covenants

SB 01-145 created environmental covenants, which provide a mechanism for property owners to establish certain restrictions or conditions for their properties, in place of a full cleanup, and for those restrictions or conditions to be enforceable by the department. In 2008, via passage of SB 08-037, the Senate added notice of environmental use restrictions to the statute, as a second mechanism to ensure long-term control of residual risks. As such, the program can now approve long-term cleanup plans that rely on institutional controls (i.e. environmental covenants and/or notice of environmental use restrictions) to manage risks

associated with residual contamination, thereby avoiding the difficulty and expense of remediating sites to unrestricted-use levels. To date, accomplishments include:

- The division created a registry of sites, as required by the statute. There are currently 367 individual institutional controls on the registry, with some large sites having more than one institutional control. There are 58 hazardous waste sites on the registry.
- The Colorado Attorney General's Office developed model environmental covenants and notice of environmental use restrictions language.
- The program implemented a geographic information system (GIS)-based map web page, which includes the sites with institutional controls and a link to the actual environmental covenant or notice of environmental use restrictions document. This tool allows the public to access the information, as the map in Figure 6 illustrates in Pueblo, and provides an excellent way to partner across state agencies. For example, when the state engineer of the Division of Water Resources receives a permit for a new well, the office cross-references the site with the institutional controls map, to ensure the well will be protective of human health and the environment.
- After meeting with several local governments to discuss communication and implementation issues, the division created a guidance document regarding what institutional controls are, the opportunities they offer, what is needed to create an environmental covenant or notice of environmental use restrictions, and the tracking and notification responsibilities of the state and local governments.
- Division staff and Attorney General's Office staff developed a policy describing when institutional controls should be finalized within the cleanup process, so remedies cannot be compromised through later property transactions.

Figure 6. Examples of properties under environmental covenants and notices of environmental use restrictions



CDPHE Institutional Controls Map: https://arcg.is/1eWHrj0

Permitting

Energetics Service Magazine demolition readiness floor rinsate sampling in one of the igloos.

Facilities that manage hazardous waste in a manner that requires permitting by the Colorado Hazardous Waste Program are referred to as TSDs. There are currently 21 TSDs in Colorado — six are active and required to have an operating permit, and the remaining 15 require a post-closure permit or equivalent enforceable document. Colorado has permits in place for all six of the operating facilities and for 49 of the 50 individual units on those facilities. The only unpermitted unit is at the Pueblo Chemical Depot, which includes 94 chemical weapons storage igloos (considered a single "unit"). Rather than permit these igloos, the program chose to regulate them under a compliance order until they are emptied and closed by the Army under its Chemical Demilitarization Program. With destruction of the last munition at Pueblo Chemical Depot in June 2023, and approval of the final closure plan for the permitted units at Pueblo Chemical Depot in September 2024, the facility will begin closure activities, after addressing outstanding items related to the Closure Plan.

The other 15 TSD facilities in Colorado are no longer actively managing hazardous waste but have left waste or contamination in the ground. These facilities require post-closure care or monitoring controls. Colorado has post-closure controls in place at all of the units at these facilities and processes in place to verify the controls remain effective. The Permitting Unit also issues emergency permits to entities that want to treat any potentially-reactive hazardous wastes. This ensures that the disposal method is safe for each specific type of reactive hazardous waste. Common reactive wastes that require an emergency permit are fireworks, ammunition, and unstable chemicals. The program works closely with local health departments, police departments, and bomb squads, who frequently need to dispose of these reactive wastes. In SFY 2024, 33 emergency detonation permits were issued across the state. Permitting Unit staff conducted inspections for several permitted TSDs in SFY 2024 and issued a number of Compliance Advisories and Inspection Reports associated with these efforts.

PCAPP is one of Colorado's permitted facilities. The PCAPP facility began processing 155mm munitions filled with mustard chemical warfare agent in 2016; this campaign ended in 2020. PCAPP began processing 105mm munitions filled with mustard chemical warfare agent in 2020. In 2022, the PCAPP facility completed the 105mm projectile destruction campaign and transitioned to destruction of the remaining 4.2-inch mortar rounds in the main plant. Processing of 4.2-inch mortars was completed on June 16, 2023, and the final munition at Pueblo Chemical Depot was destroyed on June 22, 2023, ahead of the treaty deadline of September 30, 2023. A total of 780,089 chemical weapons, containing 2,613 tons of mustard agent, were destroyed during facility operations. Nationally, the final munition was destroyed at the Blue Grass Army

Depot in Kentucky on July 7, 2023, marking the elimination of the United States' declared chemical weapons stockpile.

On January 3, 2024, the Permitting Unit approved PCAPP's request for temporary authorization of its Class 2 Permit Modification Request to begin early disassembly and containerization of equipment under engineering controls. Authorization for early disassembly and containerization supported PCAPP's efforts to keep its workforce busy until final closure plan approval. The Permitting Unit approved PCAPP's final closure plan on March 29, 2024. In SFY 2024, the Permitting Unit reviewed and/or approved 11 permit modifications for the PCAPP main plant, one permit modification for the static detonation chambers, and two modifications for the Pueblo Chemical Depot permit.

The on-site Immobilized Cell Bioreactors (ICBs) continued to provide treatment for hydrolysate generated by the main plant during the initial stages of facility closure. The ICBs use microbes to biodegrade hydrolysate, the waste resulting from the neutralization of mustard agent. The bioreactors have proven to be a highly-effective and efficient technology for degrading hydrolysate, leaving only water (recycled through the plant) and salt cake (taken off site for hazardous waste landfill disposal). As the amount of hydrolysate generated by the main plant decreased, ICB modules were taken offline. As of July 2024, the status of all ICB modules has transitioned from operational to closure.

Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP)

Munitions processing at PCAPP

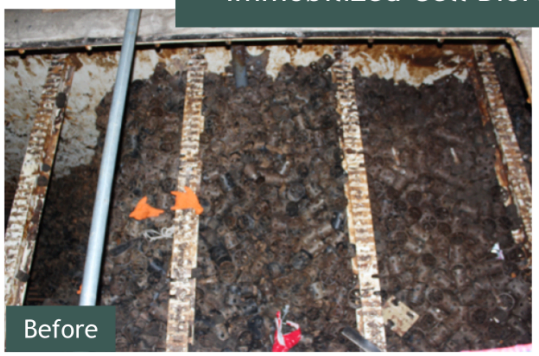
780,089

chemical weapons destroyed

Mission complete

Immobilized Cell Bioreactors modules floor rinsate sampling

Immobilized Cell Bioreactor media cleanout



Compliance assistance

A goal of the Hazardous Waste Program is for all regulated facilities to be in compliance with state laws and regulations. The traditional inspection and enforcement program is one way to reach that goal. Compliance assistance is another important method for obtaining and maintaining compliance. The General Assembly recognized the value and importance of compliance assistance as one of the expectations set out in SB 00-177, Section 25-15-301.5(2)(g), C.R.S., calling for the department to "establish a preference for compliance assistance with at least 10 percent of the annual budget amount being allocated to compliance assistance efforts." In SFY 2024, the program met this requirement, with 11.6 percent of staff time devoted to compliance assistance.

Program inspectors incorporate compliance assistance and pollution prevention into compliance inspections, when appropriate. The Compliance Assurance Unit provided guidance documents and person-to-person consultation on 151 of the 251 inspections performed this year. Under the Generator Assistance Program, five facilities requested site visits this year, which involves a free site visit to help facilities come into, or stay in, compliance with Colorado's hazardous waste requirements.

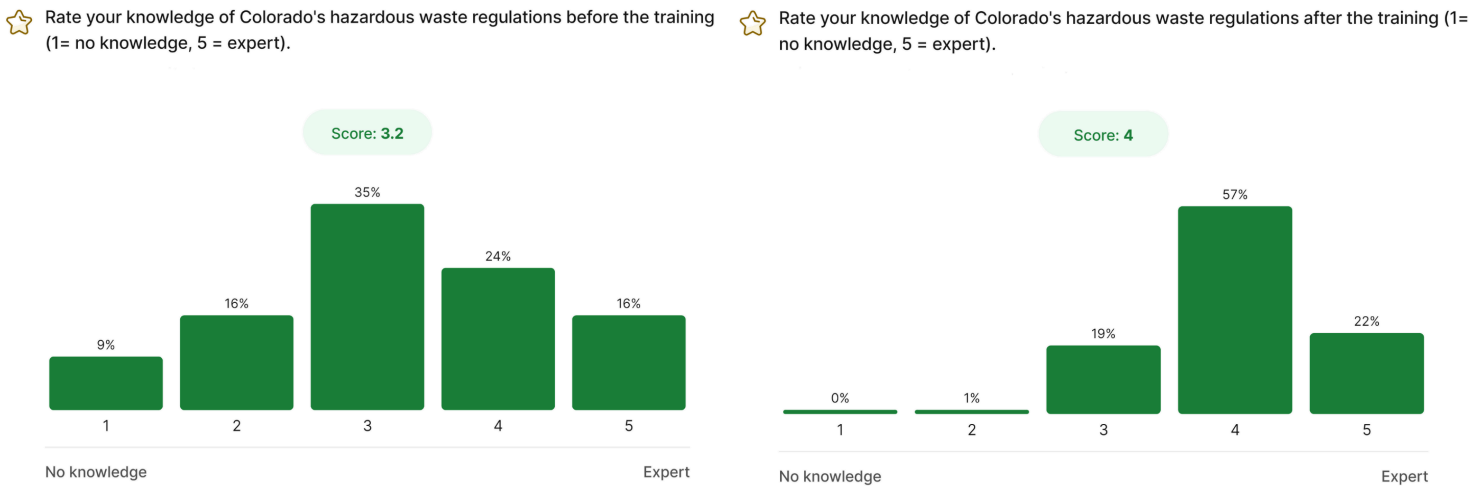
FY 2024 by the numbers:

- **60% of inspections** offered compliance assistance.
- **5,233 web hits** for our annual hazardous waste regulations training.
- **633 responses** to calls and emails by our Technical Assistance Line.
- **2,623 web hits** for hazardous waste regulations and statutes.
- **11,623 web hits** for our main Hazardous Waste Program webpage.
- **2,734 web hits** for hazardous waste management guidance and policy.

Hazardous Waste Regulations training

As part of its compliance assistance efforts, the Hazardous Waste Compliance Assurance Unit hosts an annual training for facilities that generate hazardous waste. In 2020, the COVID-19 pandemic required a shift to the new remote format, however the unit found that by pivoting to a webinar-based platform, the training was more accessible to a greater number of people and facilities throughout the state. In September 2024, an in-person training session was offered for the first time since 2019, in addition to the remote training. The in-person training was offered in response to facility requests and feedback provided during previous virtual training events.

At the annual training, hazardous waste inspectors present hazardous waste generator regulations and allow regulated facility personnel the opportunity to ask inspectors questions regarding hazardous waste compliance at their specific sites. All of the presentations, along with related reference materials, are posted on the Hazardous Waste Regulations Training webpage. This allows facilities to access them throughout the year for their own training use.



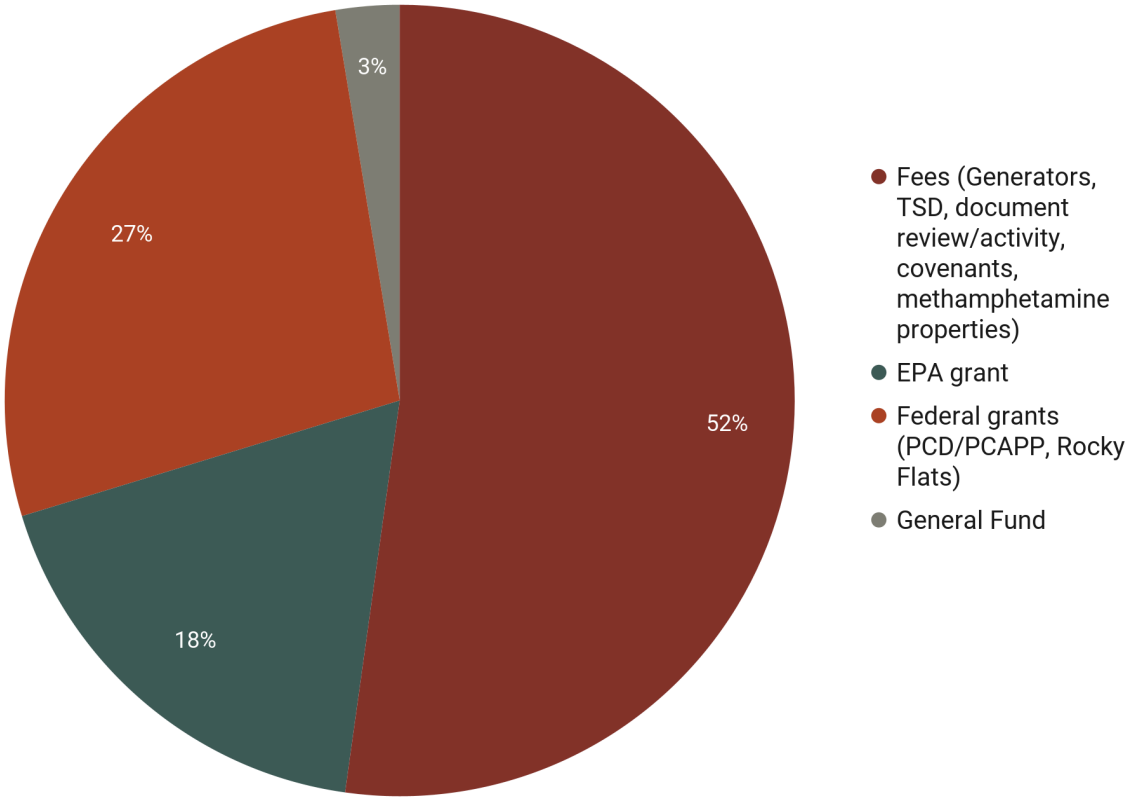
Example of Hazardous Waste Regulations polling results.

In SFY 2024, registrations for the in-person training was capped at 100 individuals, due to room capacity, and 679 individuals registered for the virtual training. Actual attendance was lower (77 in-person, 565 virtual) due to no-shows and last minute cancellations. The total number of registrants decreased from the 2023 training, likely due to the reinstatement of a registration fee to cover the costs of the in-person training. The 2023 training drew 854 attendees and 1025 registrants; there were 914 registrants in 2022, 695 registrants in 2021, and 382 registrants in 2019. Ninety-eight percent of survey respondents agreed or strongly agreed that the training was well-organized. The program continued live polling this year to allow for more audience interaction, and 94 percent of survey respondents said the live polling helped them stay engaged in the training.

Program funding

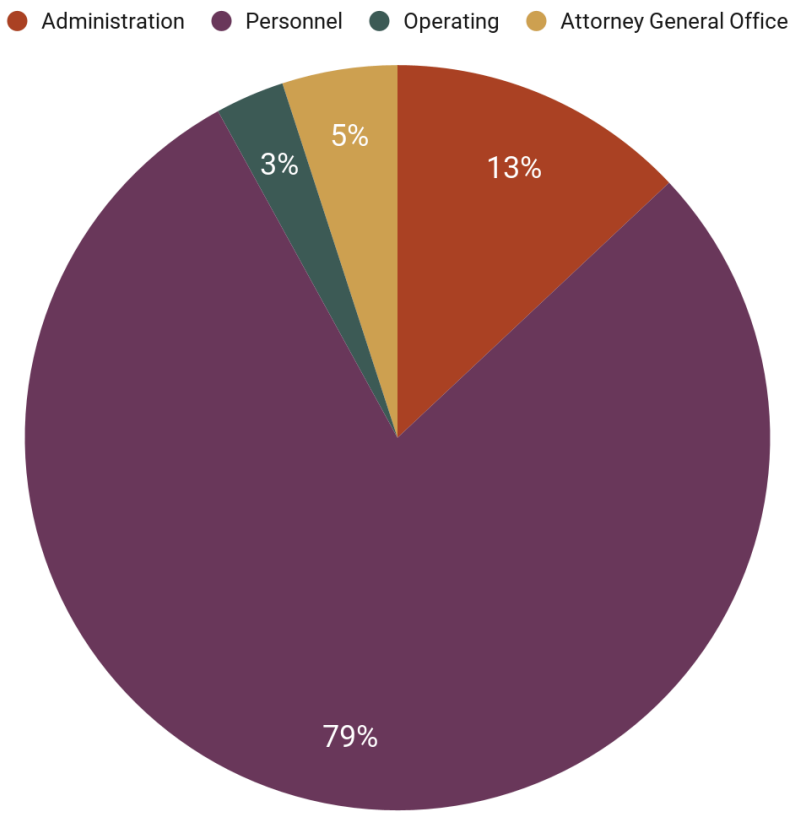
Funding for the Colorado Hazardous Waste Program comes from cash fees and federal grants. In SFY 2024, the program also received Colorado General Fund money to fund 1) one full time employee to support the PFAS program created by HB 22-1345, and 2) one full time employee to create the database of methamphetamine-affected residential properties required by SB 23-148. Federal funding for the Chemical Demilitarization Project and Rocky Flats site made up 27 percent of overall program funding. Fee revenues and the EPA grant made up just over 70 percent of program funding, and approximately three percent of funding came from the General Fund (see Figure 7).

Figure 7. Program funding (approximate)



The cash fees are occasionally increased to cover increasing program costs. The Colorado Solid and Hazardous Waste Commission passed the last fee increase in 2009. It is important to note that personnel costs are the largest single expense item for the program. Therefore, managing staffing levels is an important part of managing the program budget. The ability to continue with the current fee level is largely due to the process improvements and efficiencies implemented by staff. The program is committed to using technology, acting on ideas from our regulated entities and stakeholders, and continuous quality improvement. Program expenditures, by percent, are illustrated in Figure 8.

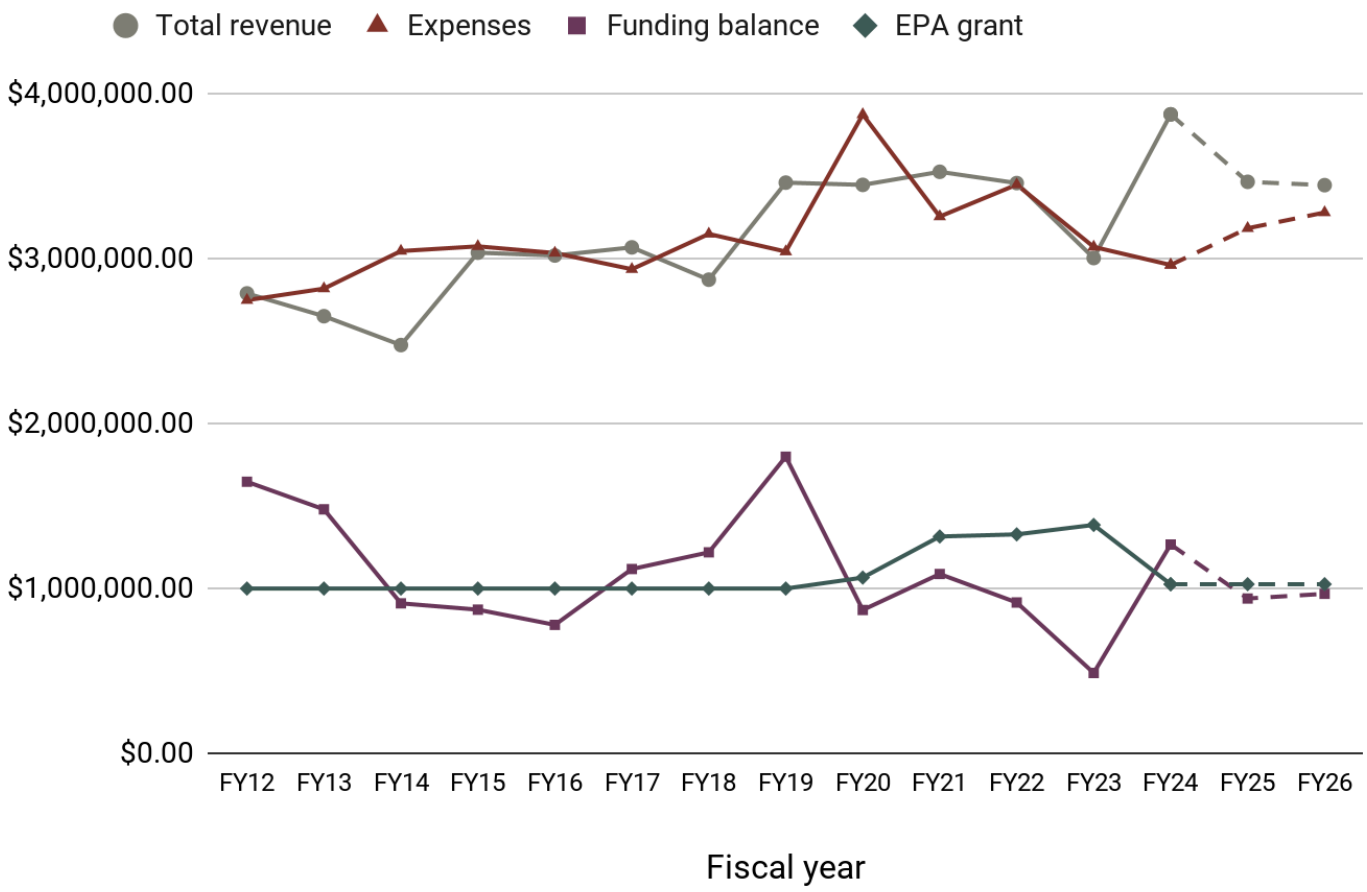
Figure 8. Program expenditures (percent)



The EPA grant allotted to the program had remained essentially flat for more than 15 years, however it increased by 23 percent in 2021, stayed consistent in 2022, and increased slightly in 2023, due to a one-time allotment to support the Hazardous Waste Service Fund, and then decreased in 2024, due to end-of-year cuts in federal funding. The EPA grant is expected to remain at this decreased level in 2025.

Figure 9 illustrates the revenue from Hazardous Waste Program fees and the EPA grant, expenditures, and Hazardous Waste Service Fund balance. The key data lines on Figure 9 are the total revenue, total expenses, and the cash balance in the Hazardous Waste Service Fund. Figure 9 shows a decrease in program revenue and expenses in SFY 2023 followed by a significant increase in revenue in SFY 2024. Staff vacancies resulted in reduced personnel expenses in SFY 2023 and 2024, and some reduction in SFY 2023 revenue, due to a reduction in billable staff time. The significant difference in SFY 2023 and SFY 2024 revenue appears to be primarily the result of some SFY 2023 fee revenue posting in SFY 2024, due to delays in the fee payments. This is supported by the fact that invoiced fee levels remained consistent, and the average revenue over the two-year period is consistent with previous years. Revenue in SFY 2025 is expected to remain at this level, and the fee level associated with the Hazardous Waste Service Fund is projected to remain adequate for at least two more years.

Figure 9. State fiscal year 2024 Hazardous Waste Program budget analysis



Conclusion

This report shows how the division has implemented and maintained significant improvements to the Hazardous Waste Program to satisfy the expectations set out by SB 00-177 (Section 25-15-301.5, C.R.S).

Key accomplishments include:

- Maintaining program authorization by the federal government (i.e. EPA);
- Maintaining a program that is credible and accountable;
- Maintaining a program that is innovative and cost-effective;
- Maintaining an effective inspection rate;
- Training people across the state on Colorado's Hazardous Waste Regulations; and
- Emphasizing compliance-assistance efforts.

Efforts undertaken by the program have significantly improved both the efficiency and effectiveness of the program. Major program accomplishments include continuing emphasis on innovative compliance assistance projects; maintaining high inspection efficiency and corrective action efficiency; maintaining timeliness of enforcement actions; and meeting or exceeding national goals set by the EPA for corrective action, permitting, inspections, and enforcement.

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Statute:
Section 25-15-301.5(3), C.R.S.

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