Community Involvement & Communication Plan (CICP) For Aeroflex Colorado Springs

DRAFT

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INTRODUCTION

This document describes the Community Involvement & Communication Plan (CICP) for Aeroflex Colorado Springs (Aeroflex).

The goals of this plan are as follows:

- a. Implement a successful communications strategy for the community interested in Aeroflex operations related to the requirements of the Environmental Management System (EMS) permit.
- b. Maintain relationships with the public, Colorado Department of Public Health and Environment (CDPHE), Colorado Springs Fire Department (CSFD), El Paso County Health Department and other interested entities.

PROJECT OVERVIEW

In August of 2004, Colorado Department of Public Health and Environment (CDPHE) adopted regulations associated with the Environmental Management System (EMS) 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:

- a. Utilizing an EMS to deliver compliance equivalent performance through enforceable performance standards.
- b. Reliance upon an EMS with specific, CDPHE-approved performance improvement goals to raise environmental performance through continual environmental improvement.
- c. The use of an EMS to continue producing compliance and performance into the future
- d. 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
- e. The appropriate allowance for stakeholder involvement in a participant's environmental footprint, compliance history, and community relations situation
- f. The consideration of cross-media impacts when making environmental decisions
- g. Finding ways to have the regulated organizations' EMS efforts replace and/or augment some of governments 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 and systems modification processes.

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

COMPANY PROFILE

Aeroflex Colorado Springs is a supplier of integrated circuits and circuit card assemblies for the aerospace, commercial, communication and industrial markets. Aeroflex Colorado Springs is a subsidiary of Aeroflex, Inc, which is located in Plainview, NY.

The facility is compromised of one building that was constructed in 1991 by then owner Hamilton Standard, a subsidiary of United Technologies Corporation (UTC). In 1996 the company merged with UTMC, a sister company within UTC. Aeroflex acquired the facility in 1999. From 1991 – 1996 the facility operated as an electronic manufacturer supplying custom and semi-custom microelectronics to the aerospace and defense industry. In 1996 UTMC merged with the company and a fabless semiconductor production line was added. In addition to the circuit card assembly operation, Aeroflex designs, packages and tests semicustom and standard VLSI (Very Large Scale Integrated) integrated circuits.

SITE DESCRIPTION AND LOCATION

Aeroflex Colorado Springs is located at 4350 Centennial Boulevard in Colorado Springs, Colorado.

Aeroflex occupies approximately 14 acres, half of which is open space. The facility is compromised of one building of approximately 102,000 square feet. Within the facility is an electronic manufacturer production line for custom and semi-custom circuit card assemblies and a fabless semiconductor production line that designs, packages and tests semicustom, standard VLSI and mixed signal integrated circuits.

Operations within the building include administration, sales and marketing, support, research and development, engineering and manufacturing.

SURROUNDING PROPERTIES

Aeroflex Colorado Springs is located at 4350 Centennial Boulevard. This location is southwest of the Garden of the Gods/Centennial intersection.

East - Directly to the east across Centennial Boulevard is a strip mall shopping center that has Albertsons, Longs Drug Store and other small shops.

North - To the north are several office buildings, including Kinko's.

West - To the west is Intel.

South - To the south is Chelsea Glenn, which is a residential area.

ENVIRONMENTAL HISTORY

Aeroflex Colorado Springs has always had an excellent environmental history. Although Aeroflex 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. Aeroflex's management systems have been very successful.

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

As a result of Aeroflex's environmental management programs, Aeroflex Colorado Springs became part of CDPHE's Environmental Leadership Program in 2002. Aeroflex continues to participate in this program which recognizes entities that go beyond environmental compliance requirements.

PERMIT SUMMARY

Air Permit:

<u>Description:</u> This permit regulates the air emissions and sources from the facility. Regulated substances include criteria pollutants (nitrogen oxide, sulfur dioxide, carbon monoxide, particulate, volatile organic compounds, etc.) and hazardous air pollutants.

<u>Regulatory Agency:</u> Environmental Protection Agency (EPA), CDPHE and El Paso County Health Department

<u>Renewal Frequency:</u> Every 5 years a revised Air Pollution Emission Notice is required.

Requirements included in EMS Pilot: Yes

Stormwater Permit:

<u>Description:</u> This permit regulates the runoff from facility production areas, parking lots, roof tops, etc that come into contact with Stormwater and may contain regulated contaminates.

Regulatory Agency: EPA and CDPHE

Renewal Frequency: Every 5 years

Requirements included in EMS Pilot: Yes

Hazardous Waste Generation:

EPA Identification Number: COD983780362. Small Quantity Generator.

OBJECTIVES OF THE CICP

This CICP summarizes Aeroflex's program for communicating with the community and other interested entities. This communication is intended to be a two-way communication process.

The objectives for the Aeroflex CICP are to:

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

Community Survey:

In December, 2004, Sue Crane-Jennings, Aeroflex EH&S Manager, along with Jeannine Natterman of CDPHE conducted a survey of various members of the community. These members included several individuals who lived in Chelsea Glenn, the neighborhood directly to the south of Aeroflex. Also included was a member of Colorado Springs City Council, an El Paso County Commissioner, three employees of Intel, two members of Sierra Club and two members of Colorado Springs Fire Department's Office of Emergency Management.

The purpose of this survey was to find out how much the community knew about Aeroflex, and to find out how much interest there would be in a CICP group. The results were that hardly anyone knew about Aeroflex and everyone was interested in being involved in a PAG (Public Advisory Group) group.

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 Aeroflex Management and CDPHE, to take an advisory role in the evaluation, analysis and discussion of the EMS Permit Pilot Program. Aeroflex Management 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 Aeroflex.

Potential Members of the PAG:

Scott Hente

City of Colorado Springs City Council Member P.O. Box 1575, Mail Code 1549 Colorado Springs, CO 80901-1575

Email: shente@springsgov.com

Jerry Haile

Director of Environmental Services

El Paso County

Email: jerry.haile@elpaso.co.com

Sallie Clark

El Paso County Commissioner

Email: sallie.clark@elpaso.co.com

Jane Ard-Smith

Chair – Pikes Peak Group of the Sierra Club

522 North Royer Street

Colorado Springs, CO 80903

Email: jane.ard-smith@lexisnexis.com

Scott Smith

Emergency Manager

Office of Emergency Management

City of Colorado Springs

375 Printers Parkway, Mail Code 1442

Colorado Springs, CO 80910

Email: scottsmith@springsgov.com

Steve Dubay

Battalion Chief

Director, Office of Emergency Management

Colorado Springs Fire Department

City of Colorado Springs

375 Printers Parkway, Mail Code 1442

Colorado Springs, CO 80910

Email: sdubay@springsgov.com

Allen Bishop

1314 Chesham Circle

Colorado Springs, CO 80907

John Fandel

Jim Lockhart

Pikes Peak Group of the Sierra Club

email: jlock@datawest.net

1528 Chesham Circle Colorado Springs, CO 80907

Bob Fowler 1307 Chesham Circle Colorado Springs, CO 80907

Judith Cara Community Relations Manager Intel 1575 Garden of the Gods Road, Colorado Springs, CO 80907 Email: judith.m.cara@intel.com

Kim Carson EHS Manager Intel 1575 Garden of the Gods Road, Colorado Springs, CO 80907 Email: kim.carson@intel.com

Carl Farley
Environmental Engineer
Intel
1575 Garden of the Gods Road,
Colorado Springs, CO 80907
Email: carl.farley@intel.com

Sue Crane-Jennings EHS Manager Aeroflex Colorado Springs 4350 Centennial Boulevard Colorado Springs, CO 80907

A member of Colorado Department of Public Health & Environment