

Final Environmental Impact Statement Responses to Comments on Draft EIS

Design, Construction and Operation of
One or More Pilot Test Facilities for
Assembled Chemical Weapons
Destruction Technologies at
One or More Sites

April 2002

**Program Manager
Assembled Chemical
Weapons Assessment**

Anniston Army Depot, Alabama

Pine Bluff Arsenal, Arkansas

Blue Grass Army Depot, Kentucky

Pueblo Chemical Depot, Colorado

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NOTATION

ACDF	Anniston Chemical Demilitarization Facility
ACW	assembled chemical weapon
ACWA	assembled chemical weapons assessment
ADEQ	Arkansas Department of Environmental Quality
AEGL	acute exposure guideline level
ANAD	Anniston Army Depot
ASC	allowable stack concentration
BGAD	Blue Grass Army Depot
Bio	biological treatment or biotreatment as used in Neut/Bio
BVFD	Boone Volunteer Fire Department
CatOx	catalytic oxidation unit
CDC	Centers for Disease Control and Prevention
CERCLA	<i>Comprehensive Environmental Response, Compensation and Liability Act</i>
CFR	<i>Code of Federal Regulations</i>
CHB	container handling building
CLA	Chemical Limited Area
CO	carbon monoxide
CO ₂	carbon dioxide
CSEPP	Chemical Stockpile Emergency Preparedness Program
CWC	<i>Chemical Weapons Convention (Convention on the Prohibition of the Development, Production, Stockpiling, and Use of Chemical Weapons)</i>
DBC	Donavon blast chamber
DEIS	draft environmental impact statement
DOD	U.S. Department of Defense
DRE	destruction and removal efficiency
EDS	engineering design study
EIS	environmental impact statement
Elchem	electrochemical as used in Elchem Ox
EJ	environmental justice
EPA	U.S. Environmental Protection Agency
EPCRA	<i>Emergency Planning and Community Right-to-Know Act</i>
FEIS	final environmental impact statement
FEMA	Federal Emergency Management Agency
GPCR	gas-phase chemical reduction
HAP	hazardous air pollutant
HC	hydrocarbon

ICB	immobilized cell bioreactor
JACADS	Johnson Atoll Chemical Agent Disposal System
KOH	potassium hydroxide
LDR	land disposal restriction
MACT	maximum achievable control technology
MAV	modified ammunition van
MCE	maximum credible event
munitions demilitarization building	
MEI	maximally exposed individual
MPT	metal parts treater
MSDS	Material Safety Data Sheet
NAAQS	National Ambient Air Quality Standards
NaOH	sodium hydroxide
NEPA	<i>National Environmental Policy Act</i>
NESHAP	National Emission Standards for Hazardous Air Pollutants
Neut	neutralization as used in Neut/Bio, Neut/SCWO, and Neut/GPCR/TW-SCWO
NPDES	National Pollutant Discharge Elimination System
ONC	on-site container
Ox	oxidation as used in Elchem Ox
PAS	pollution abatement system
PBA	Pine Bluff Arsenal
PCB	polychlorinated biphenyl
PBCDF	Pine Bluff Chemical Disposal Facility
PCD	Pueblo Chemical Depot
PFS	pollution filter system
PGB	process gas burner
PM	particulate matter
PM _{2.5}	coarse, inhalable PM with a mean aerodynamic diameter of 2.5 µm or less
PM ₁₀	fine, inhalable PM with a mean aerodynamic diameter of 10 µm or less
PMACWA	Program Manager Assembled Chemical Weapons Assessment
PMCD	Program Manager for Chemical Demilitarization
PPE	personal protective equipment
QA	quality assurance
QC	quality control
RCRA	<i>Resource Conservation and Recovery Act</i>

SCWO	supercritical water oxidation
SRE	system removal efficiency
SVOC	semivolatile organic compound
TABOR	Taxpayers Bill of Rights
TAF	time after functioning
TEF	toxicity equivalency factor
TEQ	toxic equivalency
TCLP	Toxicity Characteristic Leaching Procedure
TOCDF	Tooele Chemical Agent Disposal Facility
TRD	Technical Resource Document
TSCA	<i>Toxic Substances Control Act</i>
TSD	treatment, storage, and disposal
TTC	Transportation Technology Center
TW	transpiring wall as used in Neut/GPCR/TW-SCWO
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compound
3-D	three-dimensional

1 INTRODUCTION

This Volume 2 of the *Final Environmental Impact Statement for the Design, Construction and Operation of One or More Pilot Test Facilities for Assembled Chemical Weapons Destruction Technologies at One or More Sites* (ACWA FEIS) contains responses to public comments on the draft environmental impact statement (DEIS) that was published on May 9, 2001. The Program Manager Assembled Chemical Weapons Assessment (PMACWA) prepared the DEIS in accordance with Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of the *National Environmental Policy Act* (NEPA). These procedures include a period of public comment on a DEIS prior to publication of an FEIS.

When the ACWA DEIS was distributed on May 9, 2001, a Notice of Availability (NOA) was published in the *Federal Register*. The NOA announced a 45-day comment period, which began on May 11. In response to requests for an extension, the comment period was extended for an additional 45 days to August 9, 2001. During the period from May 11, 2001, to August 9, 2001, comments on the DEIS were gathered from letters, phone messages, e-mail, and facsimile copies. The documents containing these comments are included in Chapter 3 of this volume of the FEIS. Individuals and organizations were also given the opportunity to comment in person and with written materials at public meetings held in Anniston, Alabama; Pine Bluff, Arkansas; Pueblo, Colorado; and Richmond, Kentucky. At these meetings, oral comments were transcribed, and the transcribed comments are also included in Chapter 3 of this volume of the FEIS.

Table 1.1 provides an index to the Chapter 3 comment documents organized by the name of the person providing the comments. A petition from Alabama signed by many people is simply listed as "Anniston Petition." Table 1.2 provides an index of the comment documents organized by the name of the organization providing the documents, if an organizational affiliation was given by the commentator. The actual comment documents appear in Chapter 3, where they are numbered and organized by comment number. Because individuals (each of whom was assigned a comment document number) may have had several opportunities to provide oral statements, their comments may be found in more than one location and appear to be out of order. To assist readers in finding the documents with their comments, at the beginning of Chapter 3, an index is provided that lists the page number where each comment document begins. Readers who are interested in comments related to ANAD, PBA, PCD, or BGAD should consult Table 1.3 to find a list of comment documents organized by state of origin. (All tables mentioned here in Chapter 1 are presented after this text.)

The EIS preparers read and evaluated all the statements made in the comment documents. They then identified the location and content of comments about the ACWA DEIS and comments about the PMACWA NEPA process. Each comment that required a response was marked and given a sequential number within the document. Not all text within each document was considered to be a comment about the content of the ACWA DEIS or the PMACWA NEPA process. Statements made by commentators about themselves, statements of facts that were not made in the context of the ACWA EIS, statements of opinion that did not question the content of the EIS, or statements related to other ongoing studies or other NEPA reviews were not identified as requiring a response.

At the same time that the ACWA EIS was being reviewed by the public, the Program Manager Chemical Demilitarization (PMCD) was receiving comments on another EIS that addresses alternatives for assembled chemical weapons stockpile destruction at Pueblo Chemical Depot (the PCD EIS). The comment period for the PCD EIS, including public meetings, occurred at the same time as the comment period and public meetings for the ACWA EIS. Many of the comments received by PMACWA were comments about the PCD EIS or the issue of stockpile destruction. Although many of these comments were not marked for response in this ACWA FEIS, some examples were identified and are addressed in Sections B through D of Chapter 2 of this volume. Some comments on incineration technologies, which were alternatives in the PCD EIS but were not alternatives in the ACWA EIS, were also identified and are discussed in terms of the scope of the ACWA EIS in Sections A through D. However, no attempt was made to address all comments related to other EISs or to issues not within the scope of the ACWA EIS.

Many of the comments on the ACWA EIS were similar in content. Similar comments were aggregated and summarized into a single statement. This single summary comment statement was then addressed, and a response to it was prepared. Also, many lengthy or repetitive comments were abstracted into shorter comment statements before the responses were prepared. Chapter 2 contains the comments coupled with the responses. These couplets are presented by topic and are numbered sequentially. For instance, Comment/Response A-1 is the first couplet in Chapter 2, Section A: NEPA Process. The location of the comment itself in the comment document provided in Chapter 3 is listed in brackets at the end of the Comment A-1. Documents are listed by a two-part number, such as "96-2," which indicates that this comment was found in Document 96 at the second marked location in that document. The original text of the comment is located at the mark "96-2" in the right margin of Document 96. Multiple document locations in the brackets at the end of a comment indicate that similar statements were made in several locations in the Chapter 3 comment documents. Table 1.4 provides a cross index between Chapter 3 document numbers and Chapter 2 comment response couplet numbers. For instance, Comment/Response A-1 is listed in Table 1.2 under Document 96-2.

In order for someone to find responses to his/her comments, Table 1.1 should be consulted to find out the number of the comment document, and then Table 1.3 should be consulted to determine where in Chapter 2 the comment/response couplets for that document number are located. The comment/response couplets in Chapter 2 are organized by topic. Chapter 3 contains images of all the comment documents. The index at the beginning of Chapter 3 identifies the page number of the beginning of each comment document.

TABLE 1.1 Index of Comment Document Numbers by Name of the Commentor

Last Name	First Name	Document Number	Last Name	First Name	Document Number
Adrian	Chris	96	Childers	Joe F.	115
Albeen	Sherri	84	Chrisman	Diann R.	84
Andre	Elsie	115	Clark	Carol	84
Anniston Petition		20	Cody	Cynthia	135
Asbury	JoAnne	84	Colson	Jim	13
Ashcraft	Katie	115	Comi	Stephen	124
Ayres	Andrea	85	Comi	Teresa	84
Ayres	Melissa	127	Comi, Jr.	Dominick	84
Barber	David	41	Cooper	Pat	115
Barber	David L.	96	Corsent	Samuel J.	84
Barber	Margaret	40	Corsentino	Mary Beth	84
Barber	Margaret M.	96	Costner	Pat	119
Barber	Alex	94	Cozzo	Elizabeth	115
Barker	Margaret and David	18	Crafton	Nancy	96
Barkhoefer	M.J.	84	Crewe	Phil	115
Beller	Erica	133	Crowe	Elizabeth	115
Berry	Ray	115	Cruz	John	84
Blanton	Teri	115	Curcio	Stephen J.	84
Bleecher	Ellen	115	Curcio	Dora E.	84
Bobyn	Michele	14	Curd	Philip	115
Bobyn	Michele	42	Curd	Terrie	115
Bobyn	Michele	49	deJong	Perrin	115
Bobyn	Michele	96	Douglas	Steven G.	114
Boedecker	Ed & Lois	125	Doyle	Vicki	86
Boone	Emily C.	115	Draus	Patricia	115
Bosley	Lisa	115	Draus	Patty	115
Brenner	Lisa	118	Durham	Ann L.	112
Bromley	Harriet	115	Egley	Tamara	84
Cain	Robert	30	Esaider	M.A.	84
Cain	Anne	33	Fairbanks	Lana	84
Cain	Anne	96	Fast	Loretta Jane	96
Cain	Roberta	96	Fast	Loretta Jane	84
Cain	Robert	84	Ferguson	Gregory	119
Campbell	Velma	36	Fette	Nikki	84
Campbell	Velma L.	96	Fillmore	Dona	87
Cane	Sam	55	Fitzgerald	Tom	115
Capillo	John	65	Flood	Braceleen and Kathy	115
Capillo	John	115	Fontaine	Joan L.	7
Carlson	Pat	84	Fraser	Ron and Becky	3
Carter	Gary	84	Frederick	Diane	115
Casini	Greg	96	Frederick	Robert	115
Cellarius	Doris	96	Futrell	Richard	67

TABLE 1.1 (Cont.)

Last Name	First Name	Document Number	Last Name	First Name	Document Number
Futrell	Richard	103	Hille	Peter	115
Futrell	Dr. Richard	115	Hindman	Doug	76
Gale	Doug	32	Hobbs	Daniel G.	10
Gale	Doug	46	Hobbs	Alison	15
Garcia	Cathy	6	Hobbs	Dan	43
Garcia	John A.	96	Hobbs	Dan	96
Garduno	Y.J.	84	Hollar	Eric	84
Garduno	Mary C.	84	Holm	David W.	104
Garduno	Thomas	84	Holt	Ken	02
Gettel	Ronda	84	Howe-Kerr	Larry	29
Gibbs	Doug	23	Howe-Kerr	Kathy	96
Gomez	Peggy	84	Howe-Kerr	Larry	96
Goss	Evangeline Z.	8	Howland	Shirley	54
Goss	Evangeline Z.	83	Howland	Keith	60
Goss	Evangeline	115	Humphrey	Bruce	84
Grandgeorge	Becky	115	Jarett	Mike	115
Grandgeorge	David	115	Johannsen	Kristin	115
Gress	Sandra	84	Johansson	Judith	51
Groenewold	Jason	117	Johansson	George	96
Grunwald	Joanne	5	Johansson	Geo. & Judith	84
Guy	Erin	115	Johnson	Brenda	84
Guy	James	115	Johnson	Kent	84
Hacsı	Tiffany	84	Jones	Karyn J.	113
Halbig	Teena	115	Juzwik-McDonald	Joanna	115
Hanbauer	Elizabeth	84	Keator	Antoinette	84
Hanbury	Millard	58	Keda	Bonnie A.	84
Hanger	Richard W.	96	Kelly	Barbara	115
Hanger	Rick	109	Kennedy	Loretta	72
Hannon	Mike	115	Kiefer	Jack	64
Harker	Don	115	King	Cindy	117
Harpel	Pennie	84	King	Doyle	84
Hart	Diane	35	Kinney	Rufus	63
Hart	Diane	38	Kinney	Rufus	108
Hart	Diane	96	Kleffman	Lois	115
Hart	Diane	96	Kleffman	Tori	115
Hart	Diane	106	Kleffman	Tory	115
Hart	Jana	126	Klomp	John L.	72
Hart	Terry A.	93	Kochevar	MaryAnn	84
Hartbauer	Wilbur	84	Koneija	Dixie	84
Hensley	Tom	115	Kornelly	Irene L.	26
Hernandez	Art	84	Krasovic	John J.	84
Herzberger	Carolyn	81	Krasovic	Evelyn J.	84
Herzberger	J.E.	97	Lane	Brenda	84
Hibberd	Jeanne	115	Latka	Michelle	37

TABLE 1.1 (Cont.)

Last Name	First Name	Document Number	Last Name	First Name	Document Number
Latka	Michelle	96	Morgan	James	70
Latka	Michelle	107	Mosley	Tracy	21
Lawson	Mitch	108	Mosley	Tracy	79
Lesar	Mildred	84	Mueller	LaVonne	128
Lewis	Shirley A.	98	Murphy	Donna	91
Lindell	Brenda	108	Murphy	Donna	84
Liptz	Dave	84	Mutz	Lori	84
Livingston	Reid	115	Nelson	Danny R.	122
Llewellyn	Carol	84	Nielsen	Joan	84
Lyon	Cindy	115	Noonan	Rebecca	115
Lyons	Gary and Helen	24	O'Brien, Ph.D.	Mary	118
Lyons	Helen	96	Oliver	Dorothy M.	96
Lyons	Helen M.	130	Olivier	Dorothy M.	105
Lyons	Gary	84	Olson	Elizabeth	115
Lyons	Helen M.	84	Organ	Louise	126
Lyons	Elizabeth	84	Palzer	Bob	118
MacQuesen	Victoria	84	Papish	Raymond E.	84
Mahaney	Ruth	16	Parker	Paul D.	84
Mahaney	Ruth	48	Parker	R.J.	84
Mahaney	Robert	47	Patrick	Guy	115
Manges	Laura	110	Patrick	Peggy	115
Manges	Laura	115	Patterson	Donald D.	108
Manges	Terry	115	Pearce	Jan	115
Marascola	Mark	84	Peulen	Matt J.	72
Marascola	Steven M.	84	Phelps	Hillary	84
Marshall	Suzanne	108	Pichler	Alene	84
Martinez	Mitzie	12	Pickering	Robert	115
Martinez	Mitzie	96	Podet	Eve	115
Martinez	Mitzie	101	Powell-McCoy	Sylvia	115
Masser	Megan	84	Powell-McCoy	Tracey	115
McCras	Miriam	84	Quintana	Elsie	84
McKnight	Bill	34	Quintana	Florencio	84
McKnight	Bill	96	Quintana	Helen	84
McKnight	Mrs. James	111	Quintana	Louisa	52
McQueen	Mary Beth	84	Quintana	Louisa	96
McQueen	Stacy	84	Quintana	Louisa	84
Menefee	Robert G.	68	Quintana	Louisa	84
Menefee	Robert	115	Quintana	Melanie	11
Mervis	Jeff	96	Quintana	Melanie	123
Miller	Anne Norton	120	Ramirez	Barb	84
Miller	Larry	84	Ramsay	Winona	115
Miller	Donna	84	Rasmussen	Margaret	134
Millham	Kevin	115	Reavis	James G.	77
Mitchell	Richard	115	Redinger	Pat	84

TABLE 1.1 (Cont.)

Last Name	First Name	Document Number	Last Name	First Name	Document Number
Reed	Mary	115	Skidmore	Charlie	96
Reed	Robin	115	Smith	Sonny	57
Reeves	Charley A.	84	Smyer	Wayne	96
Reeves	Ricky	84	Smyer	Wayne A.	84
Reith	Kathy A.	53	Smyer	Gretchen	84
Reith	Kathy	129	Soffer	Stuart D.	04
Richardson	Charlene	131	Solano	JoAnn	44
Richardson	Pat	132	Sowinski	Joan	95
Ricketts	Margaret	115	Sparks	Larry A.	102
Rikhoff	Marselle	84	Stafford	Amanda	66
Robert	Mahaney	17	Stebbins	Ann	115
Roberts	Jodie	84	Stebbins	Robert	115
Robertson	Bernice	73	Steward	Joe	119
Robets	J. W.	115	Stiles	Flossie	75
Rogers	Harvey W.	25	Stites	Wesley	78
Roidan	Terri M.	84	Strange	Jason	115
Rollins	Ken	01	Sugarmann	Stu	118
Rose	Ruth	89	Swartz	Larry	115
Rouse	David L.	115	Sweet	Frank	59
Royalb	Dennis	84	Tafoya	Arthur N.	96
Royalb	Sandy	84	Talwalkar	Chetan	115
Russell	Bret	115	Taylor	Ted	96
Rutrough	Rev. Andrew	115	Taylor	Ted	84
	L.S.				
Rutrough	Thyne	115	Teck	Alan D.	80
Sajbel	Bonnie	90	Ternes	Angie	84
Sajbel	Ed	92	Terrill	Sue	84
Sajbel	Bonnie	84	Thilman	Sally	115
Sambrook	Richard	115	Thilman	Tom	115
Sambrook	Stephanie	115	Tilley	Shane	84
Saporita	Chris	115	Tolbert	Vickie G.	108
Sbarbaro	Ed	96	Turnbull	Ellen E.	74
Schaeffer	Roberta	99	Turnbull	Ellen	115
Schaeffer	Everett W.M.	100	Van Manen	Dave	69
Schaeffer	Dr. & Mrs.	115	Van Manen	Helene	71
Schindler	Charles R.	115	Vincent	Ross	31
Schulz	Naomi	115	Vincent	Ross	96
Shafer	Lisa	19	Voorhees	Richard F.	09
Shafer	Gaylene	84	Wallace	Roberta	39
Shafer	Stan	84	Wallace	Roberta	96
Shea	Robert	84	Wanamaker	Bill	22
Shellenberger	Robert	88	Wanamaker	Bill	56
Shellenberger	Don	84	Ward	Chip	117
Sinclair	Marti	96	Warner	Richard	96

TABLE 1.1 (Cont.)

Last Name	First Name	Document Number	Last Name	First Name	Document Number
Warner	Barbara	115	Williams	Craig	117
Warner	Pate	115	Williams	Craig	118
Waters	Elaine	82	Wilson	Kathleen	45
Welch	Crawford	62	Wilson	Kathleen J.	96
Wenzl	Michael	28	Wilson	Earl	115
Wiggs	Althea	115	Wilson	Larry	115
Wiggs	Erik	115	Wilson	Larry	115
Wiggs	Tammy	115	Wyatt	Kelly	84
Wiley	Doug	10	Yates	Evelyn	119
Wiley	Doug	50	Youtsey	Frank	121
Wiley	Douglas B.	96	Yrbab	Akab	96
Williams	Jean	27	Zakrasek	Dorothy	84
Williams	Shirley	61	Zakrasek	Nick J.	84
Williams	Craig	115	Zeman	Caroline	84

TABLE 1.2 Index of Comment Document Numbers by Organization

Organization	Title	Document Number
Alabamians for Clean Air		60
Appalachian Focus		115
Arkansas CWWG		119
Arkansas Peace Center		119
Arkansas Women's Action for New Directions		119
Berea Chamber of Commerce	Director	2
Board of Pueblo City Commissioners		72
Boone/Avondale Citizen's Alliance	Director	101
Boone-Avondale Citizen's Alliance		10
Boone/Avondale Citizen's Alliance		43
Boone-Avondale Citizen's Alliance		96
Catholic Diocese of Pueblo		29
Centers for Disease Control		25
Chemical Weapons Working Group		115
Chemical Weapons Working Group		117
Chemical Weapons Working Group		118
Chemical Weapons Working Group		119
Citizens for Clean Air	President	40
Citizens for Clean Air		41
Citizens for Clean Air & Water in Pueblo & Southern Colorado	President	96
City of Richmond, Kentucky	Mayor	112
Common Ground		115
Commonwealth of Kentucky Dept. for Environmental Protection	State Environmental Review Officer	94
Community Against Pollution		61
Concerned Citizens Madison Co.		115
Coosa River Basin Initiative		108
Democracy Resource Center		115
Dialogue; Pine Bluff Citizen Advisory Commission		78
Diocese of Pueblo	Bishop of Pueblo	96
Environmental Quality Strategy Team, Sierra Club	Co-Chair	96
Families Against Incineration Risk et al.		117
Families Concern Nerve Gas Incineration		108
Floyds Fork Environmental Association		115
G.A.S.P.		113
Ghandi Center; Green Party; Peace Flotilla		46
Green Party; Constance Center for Peace & Nonviolence		32
Kentucky Environmental Foundation et al.	Executive Director	115
Kentucky Chapter of the Sierra Club		115
Kentucky Citizens Accountability Project		115
Kentucky Conservation Committee		115
Kentucky Resources Council, Inc.		115
La Petite Maison Restaurant		96

TABLE 1.2 (Cont.)

Organization	Title	Document Number
Los Pobres		96
Non-stockpile Chemical Weapons Citizen Coalition		115
Occupation Medicine Resources		96
Oregon Clearinghouse for Pollution Reduction		118
Oregon Chapter of the Sierra Club et al.		118
Oregon Toxics Alliance	President	118
Pine Bluff for Safe Disposal et al.		119
Pueblo County Department of Emergency Management; CSEPP	Director	114
Pueblo County Rocky Mountain Farmers' Union	President	96
Pueblo Foods and Harvest Sharing	Representative	34
Rocky Mountain Chapter, Sierra Club		96
Rocky Mountain Farmers Union	President	39
Rocky Mountain Farmer's Union		10
S.A.F.E. Serving Alabama's Future Environment		108
Sangre de Cristo Group, Sierra Club	Conservation Chair	96
Sierra Club Utah Chapter		117
State of Colorado Office of Emergency Management	CSEPP Program Manager	104
State of Colorado; Department of Public Health and Environment	Federal Facilities Program	95
Steel City Diner & Café		96
U. S. Environmental Protection Agency		120
U.S. Environmental Protection Agency, Region 8	Director, NEPA Program Office	135
Vietnam Veterans AR State Council		119
Washington Demilitarization Company		102
Whitehall, Arkansas	Mayor	70
World Wildlife Federation		118
Yellow Creek Concerned Citizens		115
Yousey Water Company	President/Owner	121

TABLE 1.3 Index of Comment Document Numbers by State of Origin

TABLE 1.4 Index of Response to Comments Listed by Comment Document Numbers

Document Number	Location in the Comment Document	Comment/Response Couplet Number
1	1-1 1-2	A-7 K3-3
2	2-1	D-1
3	3-1	D-1
4	4-1 4-2	O-2 Z-1
5	5-1	D-1
6	6-1	D-1
7	7-1 7-2 7-3	D-1 K3-3, L-1 DD-4
8	8-1 8-2	D-1 D-1
9	9-1 9-2	F-5 Z-4
10	10-1 10-2 10-3 10-4	D-2 O-3 DD-8 D-1
11	11-1 11-2 11-3	D-5 D-1 D-5
12	12-1 12-2	R-16, DD-8 T-6
13	13-1	D-1
14	14-1 14-2	C-1 O-4

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
15	15-1 15-2 15-3	D-1 A-6 D-1
16	16-1 16-2 16-3 16-4	D-1 D-1 N-15 D-2, E-7
17	17-1 17-2 17-3	D-1 CC-5 CC-5
18	18-1	D-1
19	19-1 19-2	D-1 D-1
20	20-1 20-2 20-3 20-4	K3-3 D-1 D-1 K3-3
21	21-1 21-2 21-3 21-4	A-6 D-1 D-1 A-6
22	22-1 22-2 22-3 22-4a 22-4b 22-5 22-6 22-7 22-8 22-9 22-10 22-11 22-12 22-13 22-14 22-15	U-4 J-11 M-3 N-5 N-23 J-6 N-21 N-4, N-41 N-4 K6-15 N-10 N-18 K8-2 K6-12 K6-13 N-9

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
22-16		P-3
22-17		O-1
22-18		K6-5
22-19		P-9
22-20		K6-16
22-21		P-14
22-22		R-17
22-23		R-17
22-24		Q-8
22-25		R-17
22-26		R-18
22-27		Q-16
22-28		R-17
22-29a		K6-31
22-29b		R-17
22-30		GG-3
22-31		BB-2
22-32		K3-6, K3-10
22-33		M-2
22-34		R-17
22-35		N-45
22-36		M-4
22-37		M-22
22-38		N-40
22-39		K8-3
22-40		N-15
22-41		N-22
22-42		N-20
22-43		K6-7
22-44		K6-6
22-45		K1-4
22-46		K7-7
22-47		N-37
22-48		K6-14
22-49		K6-15
22-50		J-13
22-51		K8-3, K8-12
22-52		Q-18
22-53		K8-3
22-54		N-22
22-55		R-20
22-56		N-38
22-57		K3-4
22-58		K3-4
22-59		N-39

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
	22-60	K3-6
	22-61	K3-6
	22-62	R-15
	22-63	K3-6
	22-64	K8-3
	22-65	K3-6
	22-66	K6-22
	22-67	K3-6
	22-68	K3-7
	22-69	I-1
	22-70	K3-9
	22-71	K3-6, K3-10
	22-72	K3-6, K3-10
	22-73	K3-11
	22-74	E-6
	22-75	J-7
	22-76	L-2
23	23-1	D-2
	23-2	K5-4, K8-5
	23-3	B-4
	23-4	B-4
	23-5	P-12
	23-6	F-2
24	24-1	D-1
	24-2	HH-1
	24-3	D-1
25	25-1	R-20
	25-2	BB-43
	25-3	R-34
	25-4	F-1
	25-5	R-1
	25-6	M-12
	25-7	N-48
	25-8	R-17
	25-9	R-17
	25-10	R-21
	25-11	R-21
	25-12	R-8, R-15
	25-13	R-22

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
26	26-1	H-1
	26-2	F-2
	26-3	R-23
	26-4	Z-1
	26-5	T-2
	26-6	K7-2, M-19
	26-7	K7-2
	26-8	O-5
	26-9	M-1
	26-10	N-44
	26-11	T-6
	26-12	Z-10, DD-5
	26-13	Z-11
	26-14	Z-16
	26-15	Z-6
	26-16	Z-7
	26-17	Z-12
	26-18	Z-8
	26-19	Z-8
	26-20	Z-13
	26-21	AA-5, AA-6
	26-22	BB-18
	26-23	BB-28
	26-24	K6-17
	26-25	Y-1
	26-26	O-6
	26-27	V-2
	26-28	Z-17
	26-29	CC-11
	26-30	E-1
	26-31	N-11
27	27-1	D-1
	27-2	Z-9
	27-3	Z-18
	27-4	Z-13
	27-5	D-2
28	28-1	J-2
	28-2a	J-2
	28-2b	D-1
	28-3	N-3, HH-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
29	29-1 29-2 29-3 29-4 29-5 29-6 29-7 29-8 29-9 29-10 29-11 29-12 29-13 29-14 29-15	P-12 L-3 M-17 M-20 K4-1 N-28 DD-8 D-1 J-1 not used N-24, N-28 N-5, N-28 Q-1 R-9 K3-3
30	30-1 30-2 30-3 30-3	A-4 B-4, R-5 B-4 R-5
31	31-1 31-2 31-3	DD-3 DD-2 DD-4
32	32-1 32-2	D-1 D-3
33	33-1	A-5
34	34-1	D-1
35	35-1 35-2	N-3 Z-3
36	36-1 36-2 36-3 36-4 36-5 36-6 36-7	A-4 D-1 P-15 R-35 R-35 R-35 R-35, AA-4
37	37-1	D-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
38	38-1	D-1
39	39-1 39-2 39-3 39-4 39-5 39-6 39-7 39-8 39-9	D-1 DD-4, DD-8 DD-8 D-1 DD-7 A-9 A-3 Z-12 D-1
40	40-1 40-2 40-3 40-4 40-5 40-6 40-7 40-8 40-9 40-10 40-11 40-12	B-5 D-1 D-1 C-1 A-3 D-4, DD-8 R-17 Z-20 BB-32 K4-2, CC-6 C-1, Q-1, R-5 C-1, Q-1, R-5
41	41-1 41-2 41-3 41-4 41-5 41-6 41-7 41-8 41-9	D-1 D-1 A-6 D-1 D-1 BB-26 R-36 D-1 R-35
42	42-1 42-2 42-3	H-2 K6-8 K6-18
43	43-1 43-2 43-3 43-4 43-5	DD-4 D-1, D-4 D-1, E-1 DD-4 D-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
44	44-1	D-1
	44-2	A-6
	44-3	A-6
45	45-1	T-3
	45-2	M-19
	45-3	T-3, T-6
46	46-1	D-1
	46-2	K6-24
47	47-1	D-1
	47-2	D-4
48	48-1	D-1
	48-2	D-1
	48-3	D-1
49	49-1	B-2
	49-2	A-4
	49-3	D-5
	49-4	D-1
50	50-1	not used
	50-2	Q-4
	50-3	DD-4, DD-9
	50-4	E-2
	50-5	E-2, BB-6, BB-8
	50-6	K6-25
	50-7	K7-1
	50-8	DD-10
	50-9	D-2
51	51-1	D-1
52	52-1	D-1
	52-2	AA-3
	52-3	AA-3
53	53-1	D-1
54	54-1	J-4
	54-2	J-4

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
55	55-1	A-3
	55-2	A-3
56	56-1	J-6
	56-2	R-17
	56-3	K3-3
	56-4	K7-8
	56-5	N-22
	56-6	K3-3
	56-7	K6-7
	56-8	K6-7
	56-9	K6-6
	56-10	K8-3
	56-11	K6-4, K8-3
	56-12	K6-7
	56-13	K6-6
	56-14	Q-18, R-17
	56-15	R-17
	56-16	N-22
	56-17	K3-6
	56-18	K3-4
	56-19	K3-4
	56-20	K3-4
	56-21	N-39
	56-22	K3-6
	56-23	K3-6
	56-24	K3-6
	56-25	R-15, K3-8
	56-26	K3-6
	56-27	K8-3
	56-28	K3-6
	56-29	K3-7
	56-30	D-6, I-1
	56-31	K3-9
	56-32	K3-3
	56-33	K3-3
	56-34	K1-3
	56-35	K1-3
	56-36	K8-1
	56-37	K3-2
57	57-1	K3-2
	57-2	G-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
58	58-1 58-2 58-3 58-4	D-1, D-4 D-1, D-4 D-1 K6-6
59	59-1 59-2 59-3 59-4 59-5 59-6 59-7 59-8 59-9 59-10 59-11 59-12 59-13 59-14 59-15	A-3 J-7 J-7 J-8 J-9 J-9 D-1 D-1 D-1 D-1 J-7 K6-7 K6-7 D-1 K6-6
60	60-1 60-2 60-3	C-1 D-7 D-1
61	61-1 61-2 61-3 61-4 61-5 61-6 61-7	D-7 D-1, K3-2 R-7 K5-2 R-7 K5-2 R-7
62	62-1 62-2 62-3 62-4 62-5 62-6 62-7 62-8 62-9 62-10 62-11 62-12	D-1 C-1, K3-2 N-3 N-3 G-1 not used GG-3 not used not used D-1 D-1 G-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
63	63-1	D-1
64	64-1 64-2 64-3 64-4 64-5a 64-5b 64-6a 64-6b	K6-19, K6-20 K6-21 N-29 N-35 D-7 D-7 A-3 A-3
65	65-1 65-2	K6-19 C-1
66	66-1	K6-3
67	67-1 67-2 67-3 67-4	C-1, Z-4 R-37 C-1 Z-4
68	68-1	D-1
69	69-1 69-2	D-1 C-1, U-5
70	70-1	O-2 Z-1
71	71-1	D-1
72	72-1 72-2 72-3 72-4 72-5 72-6	not used N-44 DD-4 Z-21 D-1 D-2
73	73-1	D-1
74	74-1 74-2 74-3 74-4 74-5	R-24 N-31 R-34 R-25 D-8

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
75	75-1 75-2 75-3 75-4 75-5 75-6 75-7	D-1 D-1 K6-24 K6-24 BB-35 A-6 D-1
76	76-1 76-2	A-3 A-8
77	77-1 77-2 77-3 77-4 77-5 77-6 77-7 77-8 77-9 77-10 77-11 77-12 77-13 77-14 77-15 77-16 77-17 77-18 77-19 77-20	K4-1 F-4 K1-1 K1-2 K4-1 J-3 P-17, R-26 K3-5 F-3 Q-13 R-34 K1-1 K3-3 C-1 BB-27 K7-6 K3-3 K8-6 K8-8, Q-10 L-2
78	78-1 78-2 78-3 78-4	K5-1 CC-7 C-1 K5-1
79	79-1 79-2 79-3 79-4 79-5	A-2 A-3 A-7 J-2 D-1 A-6
80	80-1	D-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
81	81-1 81-2	HH-1 D-1
82	82-1	D-1
83	83-1	D-1
84	84-1	D-1
85	85-1	D-1
86	86-1	D-1
87	87-1	D-1
88	88-1	D-1
89	89-1	D-1
90	90-1	M-8, T-4
91	91-1 91-2	D-1 HH-1
92	92-1	M-8, T-4
93	93-1	D-1
94	94-1 94-2 94-3 94-4 94-5 94-6 94-7	T-11 M-21 M-21 M-21 N-44, GG-4 N-44 N-44
95	95-1 95-2 95-3 95-4 95-5 95-6 95-7 95-8 95-9	N-16 P-5 N-30, N-36 BB-21 R-38 DD-4 N-43 K2-1 FF-5, GG-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
	95-10	BB-3, BB-22
	95-11	BB-4, BB-22
	95-12	BB-5
	95-13	P-6
	95-14	P-7
	95-15	BB-23
	95-16	CC-8
	95-17	Q-20
	95-18	P-1
	95-19	Q-20
	95-20	Q-11
	95-21	U-6
	95-22	BB-36
	95-23	BB-24
	95-24	HH-2
	95-25	F-1
96	96-1	A-4
	96-2	A-1
	96-3	B-3
	96-4	D-1
	96-5	BB-20
	96-6	BB-42
	96-7	R-17
	96-8	DD-4
	96-9	D-5
	96-10	DD-4
	96-11	BB-30
	96-12	DD-12
	96-13	E-2
	96-14	K6-23
	96-15	F-2
	96-16	not used
	96-17	P-18
	96-18	T-7, Z-22, CC-9, M-19
	96-19	T-7
	96-20	N-42
	96-21	K7-3
	96-22	V-2
	96-23	M-1
	96-24	B-4
	96-25	AA-5, AA-7, AA-8
	96-26	Z-15, Z-16
	96-27	Z-10
	96-28	BB-38

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
96-29	Z-6	
96-30	Z-12	
96-31	M-9, T-3	
96-32	T-8	
96-33	M-13	
96-34a	K8-4	
96-34b	V-4	
96-35	K8-13	
96-36	K8-13	
96-37	T-7	
96-38	T-6	
96-39	BB-38	
96-40	R-2	
96-41	R-2	
96-42	R-2	
96-43	R-2	
96-44	BB-36	
96-45	R-3	
96-46	R-19	
96-47	BB-37	
96-48	BB-1, BB-17	
96-49	L-4	
96-50	F-1	
96-51	F-1	
96-52	F-1, O-4	
96-53	L-6	
96-54	S-1	
96-55	U-7	
96-56	V-1	
96-57	W-2	
96-58	W-1	
96-59	W-3	
96-60	V-3	
96-61	T-10	
96-62	E-1	
96-63	Z-20	
96-64	D-1	
96-65	D-1	
96-66	F-2	
96-67	M-19	
96-68	DD-4	
96-69	N-11	
96-70	L-5	
96-71	P-12	

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
97	97-1	D-1
	97-2	D-1
98	98-1	D-1
99	99-1	D-1
100	100-1	D-1
	100-2	D-1
101	101-1	DD-4
	101-2	CC-10, DD-4
	101-3	DD-4
	101-4	DD-5
	101-5	DD-1
	101-6	E-1, E-2
	101-7	R-23
	101-8	Z-22
	101-9	Z-22
	101-10	M-19
	101-11	K7-2, M-19
	101-12	T-7
	101-13	T-3, T-7
	101-14	T-7
	101-15	N-44
	101-16	N-44
	101-17	K7-3
	101-18	V-2
	101-19	M-1
	101-20	F-2
	101-21	AA-8
	101-22	AA-5
	101-23	B-4, R-5, AA-7
	101-24	Z-16
	101-25	Z-16
	101-26	Z-10
	101-27	Z-11
	101-28	BB-38
	101-29	BB-38
	101-30	Z-6
	101-31	Z-6
	101-32	Z-12

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
102	102-1	F-2
	102-2	Q-1, R-6
	102-3	M-13, T-4, M-8
	102-4	C-1
	102-5	D-6
103	103-1	BB-25
	103-2	D-1
104	104-1	A-7
105	105-1	D-1, L-2
	105-2	T-1
	105-3	T-7
	105-4	Z-22
	105-5	Z-22
	105-6	K7-4
	105-7	K7-5
106	106-1	D-1
	106-2	F-2
	106-3	M-19, T-7
	106-4	DD-4
	106-5	N-13
	106-6	L-5
	106-7	L-6
	106-8	Q-1
107	107-1	Z-20
	107-2	P-16
108	108-1	K8-9
	108-2	N-22
	108-3	D-1, N-1, N-34
	108-4	R-4
	108-5	K8-7, P-19
	108-6	K8-7
	108-7	P-19
	108-8	P-19
	108-9	Q-3
	108-10	Q-3
	108-11	Q-2
	108-12	Q-5
	108-13	Q-6
	108-14	Q-12

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
	108-15	BB-40
	108-16	R-9
	108-17	GG-2, GG-5
	108-18	Z-5
	108-19	AA-2
	108-20	R-10, BB-9
	108-21	BB-9, BB-12
	108-22	R-11
	108-23	K6-29
	108-24	K6-29
	108-25	K3-1
	108-26	N-12
	108-27	N-13
	108-28	N-13, CC-1
	108-29	CC-1
	108-30	CC-3
	108-31	C-1, CC-3
	108-32	CC-1, CC-2
	108-33	FF-3
109	109-1	A-4
	109-2	M-13
	109-3	C-1, E-1, DD-4
110	110-1	CC-13
	110-2	R-28
	110-3	K8-4
111	111-1	K6-24, Z-14
	111-2	R-12, BB-33
112	112-1	M-10
	112-2	M-16
	112-3	N-46
	112-4	N-46
	112-5	N-44
	112-6	N-46
	112-7a	N-46
	112-7b	N-22
	112-8	N-5
	112-9	N-14
	112-10	P-2
	112-11	BB-40
	112-12	BB-39
	112-13	BB-39

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
	112-14	BB-34
	112-15	BB-39
113	113-1	J-5
	113-2	J-5
114	114-1	Z-19
	114-2	BB-6
	114-3	BB-7
	114-4	BB-10
115	115-1	M-7
	115-2	N-2
	115-3	N-20, N-21
	115-4	N-1
	115-5	N-47
	115-6	P-8, K8-7
	115-7	P-19
	115-8	P-8
	115-9	P-11
	115-10	P-13
	115-11	Q-19
	115-12	Q-3
	115-13	Q-2, Q-5
	115-14	Q-6
	115-15	Q-12
	115-16	BB-40
	115-17	BB-40
	115-18	R-29, R-30
	115-19	R-31
	115-20	GG-5
	115-21	U-1
	115-22	U-2
	115-23	U-3
	115-24	W-6
	115-25	W-5
	115-26	W-4
	115-27	Y-2
	115-28	Y-3
	115-29	Z-5
	115-30	AA-2
	115-31	K6-26
	115-32	BB-9
	115-33	BB-12
	115-34	BB-9

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
	115-35	K6-29, BB-13
	115-36	K6-29
	115-37	K3-1, M-6
	115-38	BB-31
	115-39	BB-14
	115-40	BB-15
	115-41	CC-12
	115-42	CC-12
	115-43	M-5
	115-44	M-13, M-20
	115-45	N-12
	115-46	N-13
	115-47	N-13
	115-49	CC-3
	115-50	CC-3
	115-51	C-1, CC-3
	115-52	CC-13
	115-53	CC-13
	115-54	CC-13
	115-55	CC-2
	115-56	AA-1, CC-2
	115-57	CC-2
	115-58	CC-2
	115-59	EE-1
	115-60	FF-3
116	number not used	
117	117-1	J-5
118	118-1	J-5
119	119-1	D-1
	119-2	E-5
	119-3	K8-9
	119-4	N-22
	119-7	K8-7, P-19
	119-8	K8-7, P-19
	119-9	P-19
	119-10	Q-3
	119-11	Q-3
	119-12	Q-2
	119-13	Q-5
	119-14	Q-6
	119-15	Q-12

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
	119-16	BB-40
	119-17	R-31, GG-5
	119-18	Z-5
	119-19	AA-2
	119-20	BB-9
	119-21	BB-12
	119-22	BB-12
	119-23	BB-9
	119-24	BB-13
	119-25	K6-29
	119-26	K6-29
	119-27	K3-1
	119-28	CC-12
	119-29	N-12
	119-30	N-13
	119-31	N-13
	119-32	CC-1
	119-33	C-1
	119-34	CC-3
	119-35	C-1, CC-3
	119-36	CC-13
	119-37	CC-2
	119-38	FF-3
120	120-1	Q-1, R-6, DD-4
	120-2	FF-1
	120-3	B-4
	120-4	B-4
	120-5	M-14, Q-9
	120-6	B-4
	120-7	Q-1
	120-8	N-14
	120-9	N-19
	120-10	DD-6
	120-11	DD-6, FF-2
	120-12	BB-29
	120-13	Z-2
	120-14	R-39
	120-15	O-4
	120-16	M-18
	120-17	N-28
	120-18	N-25
	120-19	N-26
	120-20	N-27
	120-21	N-6

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
120-22		M-15
120-23		Q-7
120-24		Q-17
120-25		Q-15
120-26		R-14
120-27		R-38, R-39
120-28		K6-30, R-39
120-29		M-11
120-30		R-40
120-31		R-32
120-32		F-1
120-33		T-6
120-34		T-6
120-35		AA-8
120-36		CC-4
120-37		Z-15, Z-16
120-38		FF-6
120-39		N-7
120-40		N-28
120-41		T-5
120-42		J-10
120-43		E-4
120-44		J-12
120-45		E-3
120-46		J-6
120-47		K6-9
120-48		K6-10
120-49		J-2, K6-2
120-50		FF-4
120-51		BB-19
120-52		K6-11
120-53		N-8
120-54		Q-14
120-55		R-13, FF-4
120-56		R-13
120-57		BB-41
120-58		BB-11
120-59		BB-32
120-60		BB-32
120-61		K8-10
120-62		K3-1
120-63		CC-14
120-64		BB-16
120-65		R-33
120-66		K6-8

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
	120-67	K6-27
	120-68	K6-28
	120-69	N-17
	120-70	C-2
	120-71	GG-6
	120-72	C-2
	120-73	N-32
	120-74	N-33
	120-75	P-4
	120-76	N-21
	120-77	O-7
	120-78	P-10
	120-79	K6-1
	120-80	K5-3
	120-81	S-1
121	121-1	T-9
	121-2	T-9
	121-3	X-1
	121-4	T-9
	121-5	T-12
	121-6	U-8
122	122-1	D-1
123	123-1	D-1
124	124-1	D-1
125	125-1	D-1
126	126-1	D-1
127	127-1	D-1
128	128-1	D-1
129	129-1	D-1
130	130-1	D-1
131	131-1	D-1
132	132-1	D-1

TABLE 1.4 (Cont.)

Document Number	Location in the Comment Document	Comment/Response Couplet Number
133	133-1	D-1
134	134-1	D-1
135	135-1 135-2 135-3 135-4 135-5 135-6 135-7 135-8 135-9 135-10 135-11 135-12	Q-1, R-6, DD-4 FF-1 B-4 B-4 M-14, Q-9 B-4 Q-1 N-14 N-19 DD-6 DD-6, FF-2 BB-29
136	136-1	D-1