



MEMO

TO: Project File **DATE:** June 12, 2020

CC: Jim Clarke, Jacobs Engineering

FROM: Dana Ragusa, Jacobs Engineering

SUBJECT: Hazardous Materials Technical Memorandum Addendum **Project No.:** HPP M535-003 (15864)

Introduction

The purpose of this memo is to provide updated information regarding the hazardous material assessment presented in the 2013 *South Bridge Environmental Assessment* (EA) and the *Phase I Environmental Site Assessment* (ESA) (Jacobs, 2011) prepared in support of the EA.

After the EA was completed in October 2013, updates were made to the Preferred Alternative design. For this reason, and because of the time that has passed since the EA was completed, the hazardous material assessment conducted for the 2013 EA was reevaluated based on the revised Preferred Alternative in support of the decision document being prepared for the undertaking.

The 2011 Phase I ESA was performed in general conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) International's Standard Practice E 1527-05. This assessment was performed in part to satisfy one of the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) innocent landowner defense; that is, the practices that constitute "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice," as defined in 42 United States Code (USC) 9601(35)(B).

This assessment was conducted in general conformance with the updated ASTM Standard Practice E1527-13 and includes another site reconnaissance and review of an updated regulatory report to reevaluate potential *recognized environmental conditions* that could potentially impact the proposed project. *Recognized environmental conditions* are the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.

Existing Conditions

A review of environmental regulatory records was performed in February 2020 to evaluate whether the subject properties or surrounding properties have faced or are currently facing any regulatory actions, fines, or notices of violation for conditions that may have an environmental impact on the proposed improvements.

Environmental Data Resources, Inc. (EDR) maintains federal, state, and local regulatory databases for registered sites. The database search and target property, which is the property that was used to create a search area to generate the report from EDR, included a point centered on the South Bridge new alignment just south of the Glenwood Springs Municipal Airport boundary. The database search was conducted within one mile depending on the database, consistent with ASTM 1527-13. The EDR radius report (February 20, 2020) revealed 16 listed sites within the radius search. However, a site may be listed in several different databases. The EDR radius report is provided in Attachment A.

The following listed sites from the EDR report are considered potential *recognized environmental conditions* that fall within the ASTM search radius (within one mile) from the target property for databases searched and may or may not have the possibility to impact the proposed improvements. In addition, four sites were observed during site reconnaissance conducted in 2011 and 2017 that were not included in the EDR report, but may or may not have the possibility to impact the proposed improvements and are summarized below. Lastly, in 2020, a desktop review of any land use changes was made that involved a review of Garfield County assessor's data and coordination with local planners regarding new development.

The potential *recognized environmental conditions* sites and observed sites are summarized below. Sites flagged with an asterisk are a change from the 2013 EA and 2011 Phase I ESA.

EDR Listed Sites

- **EDR Map ID A1 - A3: Orrison Distributing** – This site is located at 4919 Highway 82, approximately 0.5 mile south and upgradient from proposed improvements. The facility is listed in the Recovered Government Archive (RGA) Leaking underground storage tank (LUST) database from 1994-2000 and 2004-2012. The facility is also listed in the Leaking Tanks (LTANKS), LUST, and UST databases as having three permanently closed USTs that were used to store diesel and gasoline and one in-service UST that is used to store diesel/gasoline. A confirmed release was reported in June 1992 during removal of the USTs. In August 1997, no further action (NFA) was granted by the Division of Oil and Public Safety (OPS) and the case was closed as a Tier 1 level. Groundwater flow is to the northwest toward the Roaring Fork River and away from proposed improvements.
- ***EDR Map ID B4 – B5: Lot Coke 2 Ovens Exemption** – This site is located at 625 Airport Road, adjacent to proposed improvements. The facility is listed in the National Pollutant Discharge Elimination System (NPDES) database. A permit was obtained for stormwater discharge associated with construction activities.
- ***EDR Map ID 6: No reported name** – This site is located at 59 E. Airport Road, adjacent to proposed improvements. The facility is listed in the Colorado Emergency Response Notification System (CO ERNS) database. In September 2019, a spill occurred on site to the pavement. When responders arrived on site, the spill was

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vacuumed up and evaporating. The spill occurred from a broken hose under a deicing truck as it was moving. A mixture of propylene glycol 50:45 with water was released to the pavement and impacted the soil. Clean up measures and confirmation of clean boundaries for the impact to soil were conducted.

- ***EDR Map ID C7 – C8: Cardiff MESA** – This site is located at Airport Road and Morgan Street, adjacent to proposed improvements. The facility is listed in the NPDES database. A permit was obtained for stormwater discharge associated with construction activities.
- **EDR Map ID 9: KN Energy Inc.** – This site is located at 96 County Road (CR) 160, approximately 100 feet northeast and upgradient from proposed improvements. The facility is listed in the Resource Conservation Recovery Act (RCRA) Non-generator (NonGen) and No Longer Regulated (NLR) databases. Historic activity included a large quantity generator of ignitable and corrosive waste. No violations have been reported.
- ***EDR Map ID 10: Ron’s Auto (former Force David)** – This site is located at 160 CR 160, approximately 150 feet northeast and upgradient from proposed improvements. The facility is listed in the historic automotive database from 1994-1996 and 2004-2012. No violations have been reported. Currently, Ron’s Automotive occupies this site. Groundwater flow is to the northeast toward the Roaring Fork River and away from proposed improvements.
- **EDR Map ID 11: Mountain Valley Development** – This site is located at 700 Mount Sopris Drive, approximately 800 feet north and downgradient from proposed improvements. The facility is listed in the RCRA NonGen and NLR databases. No violations have been reported.
- ***EDR Map ID 12: Otto Zinko Gravel Pit** – There is no address listed for this site. However, the EDR report depicts this site between Four Mile Road and Airport Road, upgradient from proposed improvements. This facility is listed in the MINES database and has not been in-service since 1990. No violations have been reported.
- **EDR Map ID 13: Glenwood Springs Aviation** – This site is located at 1172 Airport Center Road, approximately 550 feet north to northeast from proposed improvements. The facility is listed in the LTANKS, LUST, and UST databases as having one permanently closed UST that was used to store gasoline and one in-service UST that is used to store gasoline. A release was reported in August 1998. There was evidence of petroleum contamination, but all samples tested below detection limits and contaminated soil was managed onsite. Per a letter dated March 1999, no further remedial action is required by OPS and the case was closed as a Tier 1 level. Groundwater flow is to the northeast toward the Roaring Fork River and away from proposed improvements.
- ***EDR Map ID 14: Mountain Market** – This site is located at 3950 Midland Avenue, approximately 0.25 mile north and downgradient from proposed improvements. The facility is listed in the LTANKS, LUST, UST, and aboveground storage tank (AST) databases. This facility is registered as having one permanently closed liquified petroleum gas (LPG) and three in-service USTs that are used to store diesel and gasoline. In November 2012, a confirmed release was reported during tank maintenance and upgrade activities of the fuel dispensing system. The release was from potential leaking in the fill piping. In addition, the overfill skirting was not fully sealed to the top of the UST. In November 2012, NFA was granted by OPS. Another confirmed release was reported in June 2016, including less than 10 gallons of diesel fuel originating from a fuel dispenser. Based on staining on concrete surface, the fuel flowed to the northwest off a

concrete paved surface and into an irrigated lawn area. The contaminated soil has been removed and does not exceed the risk-based screening levels. In September 2016, NFA was granted by OPS and the case was closed as a Tier 1 level. Groundwater flow is to the northeast toward the Roaring Fork River and away from proposed improvements.

- ***EDR Map ID 15: Chevron Bulk Plant #129-0855** – This site is located at 1175 CR 154, approximately 0.5 mile north from proposed improvements. The facility is listed in the LTANKS database. According to a March 1990 assessment report, the site was abandoned in 1980. The four ASTs and one UST were removed when the site was abandoned. An initial site assessment was conducted in 1988 and a Phase I Site Assessment was conducted in February 1990. Monitoring and remediation of the site was conducted and NFA was granted by OPS in February 1997 and the case was closed as a Tier 1 level. Groundwater flow is to the northwest toward the Roaring Fork River and away from proposed improvements.
- **EDR Map ID 16: Holy Cross Electric Association** – This site is located at 3799 SH 82, adjacent to proposed improvements. This facility is listed in the LTANKS, LUST, LUST Trust, and UST databases as having three permanently closed USTs that were used to store gasoline and diesel and two in-service USTs that are used to store gasoline and diesel. A confirmed release was reported in October 1989. The first set of tanks were removed in October 1989 and the second set of tanks were removed in August 1993. Prior to removal of the second set of tanks, evidence of hydrocarbon contamination was identified beneath one UST. Contamination was believed to be from a 50-gallon overflow. Additional excavation indicated no additional contamination. All detection levels were below state cleanup standards. Contaminated soil was removed, aerated, and then used as fill. In March 1994, OPS granted no further remedial actions. Another release was reported in May 2019. According to an October 2019 monitoring report, the release occurred during replacement of the spill buckets at the dispenser island on site that is located over 500 feet north of the proposed improvements. Groundwater monitoring wells were installed and soil samples were collected to monitor the release. None of the soil samples or groundwater samples exceeded risk-based screening levels (RBSLs). However, additional sampling was recommended to ensure the plume was stable. In November 2019, OPS granted NFA and the case was closed as a Tier 1 level. Groundwater flow is to the northwest toward the Roaring Fork River and away from proposed improvements. Partial property acquisitions are anticipated at this property.

Site Reconnaissance

A second site reconnaissance was conducted in August 2017 that identified the same sites observed during the 2011 site reconnaissance and were identified as potential *recognized environmental condition* sites. The findings from the 2017 site reconnaissance are summarized below.

- **Observed Site: IRMW of CO & Rosebud Excavation (former Pitkin Corporation)** – This site is located near the intersection of Airport Road and CR 116, approximately 500 feet south from proposed improvements. Construction equipment, building materials, and two storage tanks were observed on site.
- **Observed Site: City site (former Meyers Boiler Property)** – This site is located on Airport Road, adjacent to proposed improvements. Construction equipment and materials were observed on site.

- **Observed Site: City storage** – This site is located near the intersection of Airport Road and CR 116, approximately 350 feet south from proposed improvements. Construction equipment and materials were observed on site.
- **Observed Site: Auto garage in El-Rocko MHP** - This facility is located approximately 600 feet west from proposed improvements and is associated with automotive services.

Findings, Opinions, and Conclusions

Based on review of the listed sites and the site reconnaissance, there are no *recognized environmental condition* sites that pose a risk to proposed improvements. This is a change from the findings presented in the 2013 EA.

Based on updated design, the Preferred Alternative no longer would require partial acquisition from two of the REC sites—former Pitkin Corp and City Storage site. The former Meyers Boiler site is currently owned by the City and partial acquisitions would not be necessary. In the 2013 EA, the Glenwood Aviation site was depicted adjacent to the south side of the new alignment for a reported spill site. However, the Glenwood Aviation site is now only listed in the LUST database and the LUST event occurred approximately 550 feet north of the Preferred Alternative alignment. Contamination on the site does not extend off site, all samples tested below detection limits, and contaminated soil was managed on site. Therefore, that site is not adjacent to proposed improvements. For these reasons, the REC sites identified in the 2013 EA are not likely to pose a risk to the proposed project.

The Preferred Alternative would result in partial acquisition at one EDR listed site (Holy Cross Electric Association). Construction on this property would involve shallow excavation and repaving, but contamination or major erosion issues that could potentially impact the proposed project and/or nearby waterbodies are not anticipated. However, caution should still be taken near this site during construction because of the previously reported release at the site.

Construction personnel need to be trained to recognize signs of possible contamination in soil such as odors and staining. If contamination is encountered, work shall stop and procedures established in Section 250 of the CDOT *Standard Specifications for Road and Bridge Construction* shall be followed (CDOT 2019). Any contaminated soils or landfill material shall be properly handled and sampled prior to disposal.

In addition, owners of subsurface utilities should be contacted in areas where excavation is to be conducted in order to assess whether any of the utilities are contained in Transite™ asbestos pipe. If subsurface utilities are determined to be housed in Transite™ asbestos pipe, and the utilities need to be relocated for the project, special handling, and possibly asbestos abatement would be required.

There are several properties adjacent to the right-of-way that have structures. The buildings and structures were not inspected for the possible presence of asbestos-containing materials, lead-based paint, or petroleum hydrocarbons in soil. Only partial property acquisitions are proposed for the project, and it is unlikely that structures would be impacted. However, if final design of the project indicates that demolition of any structures is required, inspections for asbestos-containing materials and lead-based paint are recommended.

Attachment A
EDR Radius Report