Vasquez Boulevard/Interstate 70 Superfund Site
Operable Unit 2

Community Involvement Plan

U.S. Environmental Protection Agency Region 8
1595 Wynkoop St.
Denver, CO 80202

January, 2010

TABLE OF CONTENTS

1: OVERVIEW OF COMMUNITY INVOLVEMENT PLAN 2

2: SITE OVERVIEW 3

2.1: SITE BACKGROUND 3
2.2: OU2 AREA HISTORY 3
2.3: FACILITY OPERATIONS 3
2.4: PROCESS DESCRIPTION 4
2.5: WASTE AND WASTE DISPOSAL PRACTICES 4
3.1: TOPOGRAPHY 5

4: NATURE AND EXTENT OF CONTAMINATION 6

4.1: DRAFT BASELINE HUMAN HEALTH AND SCREENING LEVEL OF ECOLOGICAL RISK ASSESSMENT 6
4.2: SOIL 6
4.3: HUMAN EXPOSURE PATHWAYS 6

5: HISTORY OF COMMUNITY INVOLVEMENT 7

5.1: PLANNED EPA ACTIVITIES 7
5.2: PREVIOUS CONCERNS REGARDING SAMPLING AND CLEANUP ACTIVITIES. 7
5.3: CURRENT COMMUNITY INVOLVEMENT. 8
5.4: RESPONSE TO COMMUNITY CONCERNS 9

6: EPA'S COMMUNITY INVOLVEMENT PROGRAM 10

APPENDIX A: EPA & CDPHE SITE CONTACTS 13

APPENDIX B: VB/I-70 OU2 SITE CONTACTS 14

APPENDIX C: SITE MAP 18

ED_002396_00001599-00002

1: Overview of Community Involvement Plan

The Environmental Protection Agency (EPA) developed this Community Involvement Plan (CIP) to facilitate two-way communication between the community and businesses surrounding the Vasquez Boulevard (VB/I-70) Superfund Site Operable Unit 2 (OU2) and EPA to encourage community involvement in site activities. EPA will utilize the community involvement activities outlined in this plan to ensure that residents are continuously informed and provided opportunities to be involved.

This CIP provides a brief history of operations and ownership at OU2 (Section 2.0), describes the physical setting (Section 3.0), briefly outlines the nature and extent of the contamination (Section 4.0), provides the history of community involvement(Section 5.0), and describes EPA's community involvement program (Section 6.0). EPA and Site stakeholder contact information is listed in Appendix A and B respectively. Appendix C contains a site map. EPA drew upon several information sources to develop this plan, including community interviews, site files (remedial investigation and the previous CIP), and informal meetings and information sessions.

ED_002396_00001599-00003

2: Site Overview

2.1: Site Background

On July 22, 1999, the VB/I-70 site was listed on the EPA Superfund National Priorities List (NPL), a list of the most serious hazardous-waste sites in the country. Including the site on the NPL assures EPA immediate access to cleanup funding through the Superfund program if responsible parties fail to clean up the Site adequately. Listing also guarantees the public an opportunity to participate in cleanup decisions.

The VB/I-70 site is an area of approximately four square miles located in north-central Denver. Historically, this area was a major smelting center for the Rocky Mountain West. Three smelting plants: Omaha-Grant, Argo, and Globe operated in the area for varying lengths of time, beginning as early as 1870, refining gold, silver, copper, lead, and zinc.

In January 2010, EPA and the City and County of Denver (CCoD) completed a Remedial Investigation (RI) for OU2. The RI describes the type of contaminants found at OU2 and identifies where they are located.

EPA, the Colorado Department of Public Health and Environment (CDPHE), and CCoD continue to work together to investigate potential heavy metal contamination in the soils, groundwater, surface water, and sediments on and adjacent to OU2. OU2 is located approximately where the Denver Coliseum, Pepsi Bottling, and the Forney Transportation Museum stand today (Appendix C).

2.2: OU2 Area History

The Omaha & Grant Smelter got its start as the Grant Smelter located in Leadville, Colorado. The Grant Smelter operated in Leadville from 1878 until 1882 and was owned by the Grant Smelting Company. When the Grant Smelter was destroyed by fire in 1882, a replacement smelter was built in Denver. On July 15, 1883 the Grant Smelter merged with the Omaha Smelting Works and on July 18, 1892 the corporation was renamed the Omaha & Grant Smelting and Refining Company.

In 1899, the Omaha & Grant Smelting and Refining Company joined other smelting companies to form the American Smelting and Refining Company. The American Smelting and Refining Company continued to operate the Omaha & Grant Smelter until 1903. The American Smelting and Refining Company changed its name to ASARCO Incorporated (ASARCO) on May 15, 1975.

2.3: Facility Operations

The Omaha & Grant Smelter facility began operation at OU2 of the site in October 1882. In 1887, the facility was expanded. The facility expanded again in 1892, and a 352 foot tall smelter stack was built. The smelter operated for approximately 21 years and was closed in 1903.

ED_002396_00001599-00004

The smelter buildings were subsequently demolished once the smelter operation was closed. Sometime later, all of the slag, with the exception of any residual slag that could be buried under modern parking lots, was removed. Based on historic aerial photographs, all of the visible slag was removed by 1949. Between 1920 and 1940, various portions of the facility were deeded to the CCoD. Other portions of the facility have been, and continue to be owned or operated by the Union Pacific Railroad, the Pepsi Bottling Company, and various other corporate entities or individuals.

The properties still owned and used by CCoD are the Globeville Landing Park and the Denver Coliseum. The CCoD completed constructed of the Denver Coliseum in 1952 which encompassed the northeast portion of the former Omaha and Grant smelter facility. The approximately 10-acre Globeville Landing Park is located along the east side of the South Platte River. The park, constructed in the 1970's, encompassed part of the southwest portion of the former Omaha & Grant smelter facility.

2.4: Process Description

The Omaha & Grant Smelter facility employed a lead smelting process to produce gold, silver, copper, and lead. The smelting process involved the fusing of ore, fuel, and lime to form a melted product. As a result of this process, lead and sliver would sink to the bottom of an iron chamber and the slag would float on the surface of the liquid metals.

2.5: Waste and Waste Disposal Practices

Although detailed information about the wastes from the smelting operations is not well documented, it is known that blast furnace slag was produced from the smelting operations. An 1890 Sanborn Fire Insurance Map identifies a slag dump to the north of the Omaha & Grant Smelter property.

On December 15, 1936, CCoD announced plans to use the Omaha & Grant Smelter stack as a municipal incinerator, but use of the stack was not initiated at that time. On November 18, 1944, CCoD revived the plan. Soon after trash incineration was started, Denver received complaints about the process including issues of safety. No record of trash incineration beyond January 12, 1945 has been noted. The largest smokestack associated with the Omaha & Grant Smelter was demolished by the CCoD on February 22, 1950.

Prior to constructing the Coliseum and associated parking lot, portions of OU2 were used as a landfill for disposal of construction debris. The presence of the landfill materials beneath the Coliseum parking lot area is evident by the undulating nature of the parking lot pavement owing to differential compaction and decomposition of the underlying materials. No specific information or documentation of the time period when the landfill was active could be located. Consequently, additional investigation of the nature, extent, and depth of the landfill materials was performed as part of field investigations for the OU2 RI.

ED_002396_00001599-00005

3: Physical Setting

3.1: Topography

OU2 topography is mainly flat, sloping gently toward the South Platte River, which is located along the western boundary of OU2. OU2 is located on terraces above the modern day channel flood plain of the South Platte River.

OU2 elevations vary from 5,200 ft. above sea level along the northern boundary of the OU to approximately 5,140 ft within the flood plain of the South Platte River. The flood plain is flat with a slope of .25% to the northeast.

The surface of the primary terrace portion of OU2 generally slopes toward the northwest toward the floodplain with a grade of 4%. The edge of the terrace drops off fairly steeply to the flood plain from about 5,170 ft, with a narrow bench at 5,150 ft. A second, higher terrace is located to the southeast beneath the Forney Transportation Museum property and the commercial properties along Brighton Boulevard.

ED_002396_00001599-00006

4: Nature and Extent of Contamination

4.1: Draft Baseline Human Health and Screening Level of Ecological Risk Assessment

A Baseline Human Health and Screening Level of Ecological Risk Assessment (BRA) for VB/I-70 OU2 was completed by EPA in August 2009. Based on the results of the risk assessment and a review of existing data, surface and subsurface soil were identified as the potential media of concern. Due to the limited occurrences of trace metals in groundwater and the lack of use of groundwater for domestic supply, groundwater was not found to be a media of concern. Arsenic and lead were identified as the potential chemicals of concern.

4.2: Soil

The occurrences of arsenic and lead at concentrations greater than background levels are localized and discontinuous. Sample results did not show broad areas of contamination but only isolated areas containing concentrations of arsenic and lead above background levels. Due to the presence of buildings and pavement that reduce erosion, windblown dust, and storm water runoff containing contaminants; significant transport and migration of arsenic and lead from the soil is not expected to occur.

4.3: Human Exposure Pathways

Even though few people intentionally ingest soil, commercial workers, construction workers, and residents who have direct contact with soil at OU2 might ingest small amounts that adhere to their hands during outdoor activities. In addition, soil can enter buildings (such as workplaces or residences) leading to contamination of indoor dust, which may also be ingested by hand to mouth activities. Although exposure of commercial workers to surface soil is largely prevented by the high degree of building and pavement cover at OU2, future land owners at the site could potentially remove existing buildings or pavement and expose the underlying surface soils. Construction workers could be exposed now or in the future as a consequence of excavation activities such as installation or repair of utility lines, building foundations, etc. If in the future OU2 were redeveloped fore residential use, hypothetical future residents could be exposed to surface soil at the site.

On-Site Recreational Visitors

Recreational visitors that picnic, walk, or bike at the Globeville Landing Park might have direct contact with surface soil leading to potential ingestion or dermal exposure. However, the soils in the Park area are mainly clean fill that was brought in from other areas during park construction, so evaluation of this pathway was not needed in the risk assessment.

ED_002396_00001599-00007

5: History of Community Involvement.

In 2005, a CIP was completed for the VB/I70 Site encompassing all three operable units. This report will deal exclusively with the findings from OU2.

After a series of community interviews in 2005, we found that respondents were aware that EPA was doing an environmental investigation in the area, but they had not received any recent information and had limited knowledge regarding the project.

There was interest in receiving information from EPA on expediting the environmental process for redevelopment, how to work with EPA while redeveloping property, about the various cleanup programs/options available to redevelopers, and how businesses can be more environmentally sound. Though respondents expressed an interest in the forthcoming RI and Feasibility Study (FS), they were focused on investing in future development

Community Organizations
The **Elyria Swansea Business Association** meets monthly and periodically and sends out mailings to its members.

5.1: Planned EPA Activities

In the 2005 community involvement plan, EPA planned activities were developed. These activities are as follows:

- EPA will provide the community with regular updates about the project as significant actions occur.
- EPA will provide the community with contact information for related environmental cleanup programs available.
- EPA will update the community and community organizations and events when appropriate.

5.2: Previous Concerns Regarding Sampling and Cleanup Activities.

In the 2005 community involvement plan, there were concerns regarding the sampling and cleanup activities. These concerns are as follows:

- EPA may not be addressing all possible contamination in the area.
- EPA should consider past industrial and commercial uses that included a possible landfill.
- EPA may not be drilling enough wells to get a complete picture as groundwater flows in all different directions.
- EPA should expand the investigation because future development on and off Site will be impacted by contaminants the EPA does not address now.
- The EPA investigation could lead to on-site and off-site property owners being held liable.

ED_002396_00001599-00008

- EPA should consider sampling results already done by property owners through other projects.

Planned EPA activities in response to the above concerns are as follows:

- EPA will revisit research done on past uses at the OU2 Site.
- EPA will consider adjusting the environmental investigation if warranted.
- EPA will continue to take future use into account at the OU2 Site.
- EPA will provide all concerned property owners with property issues and liability information.
- EPA will consider all information pertinent to the investigation.

5.3: Current Community Involvement.

In January 2010, the OU2 RI was completed. At this time, EPA conducted community interviews with property and business owners located at and around OU2, along with developers interested in the future of OU2. The questions and concerns from these interviews are as follows:

- EPA should consider long term future use of property within OU2, and of the entire Brighton Blvd. corridor.
- EPA and the CCoD should consider that if OU2 were cleaned up to or left at industrial/commercial levels it could limit the potential growth and redevelopment of the Brighton Blvd. corridor.
- EPA may want to retest soil with high arsenic or lead level readings to determine if they were an anomaly.
- EPA and the CCoD should consider the different interests between property owners, business owners, and developers, and how to address the concerns of each party.
- EPA should clean OU2 to the original condition, before the Omaha and Grant Smelter was built , or clean up the most affected areas completely (i.e. to residential standards) or to pre-industrial use of OU2.
- Individuals were concerned with who is liable for the cleanup, and who will pay for the clean up if it were to occur.
- Individuals were concerned about the potential risk of arsenic and lead exposure and what levels would be harmful.
- Any remedial action planned should not interfere with the National Western Stock Show.
- EPA should establish an information repository nearby, or publish documents on the VB/I-70 EPA website.

ED_002396_00001599-00009

5.4: Response to Community Concerns
Planned EPA activities in response to the above concerns are as follows:

- EPA will establish a nearby information repository at a nearby library and will make an announcement once the information repository is established.
- EPA will provide a fact sheet regarding the OU2 Site, along with information about the potential contaminates in the area.
- EPA will continue to take future use into account at the OU2 Site.
- EPA will work with all interested parties during the Proposed Plan public comment period to plan the most appropriate remedial action.
- EPA will work with the National Western Stock Show and CCoD when planning remedial action to ensure that the Stock Show will not be affected.
- EPA will consider all information relating to the OU2 investigation and remediation.
- EPA will hold public meetings when appropriate to listen to community concerns and provide updates on OU2.

ED_002396_00001599-00010

6: EPA's Community Involvement Program

The overall goal of EPA's Community Involvement Program is to promote two-way communication between citizens and the EPA and to provide opportunities for meaningful and active involvement by the community in the cleanup process. EPA will implement the community involvement activities described below. The following plan is based upon the results of community interviews described earlier.

Issue 1: Keeping the Public Informed and Up to Date

Activity 1A: Establish and Maintain Information Repositories

- **Objective:** Provide a convenient location where interested persons can go to read and copy official documents and other pertinent information about the Site and EPA activities.
- **Method:** The repository is a reference collection of site information containing the Administrative Record file, other site-specific information, the CIP, information about the Technical Assistance Grant program, and the general Superfund process. The Community Involvement Coordinator will work with a local contact to establish the local repository. This repository will be accessible to the physically challenged, will have copier facilities, and will be available to residents, business owners, and land owners during normal business hours.

Activity 1B: Provide Site and Superfund Information on the Internet

- **Objective:** To provide key resources for searching and listing both general and specific information about Superfund and hazardous waste issues.
- **Method:** A Site status summary can be found at http://www.epa.gov/region8/superfund/co/vbi70/index.html Information about EPA and Superfund can be found at EPA Headquarters: http://www.epa.gov. The RI, FS, Proposed Plan, and the Record of Decision (ROD) for the site will be placed on the internet as they are completed.

Activity 1C: Establish and Maintain the Administrative Record

- **Objective:** Provide interested persons with a paper trail of all documents, resources, etc. used by the Remedial Project Manager and Site Team in reaching all decisions about the site and its cleanup.
- **Method:** EPA will provide at least two sets of the Administrative Record for the Site, one in the EPA Region 8 office located at 1595 Wynkoop St. Denver, CO 80202, and one located at the local Information Repository (Valdez-Perry Library 4690 Vine Street Denver, CO)

Issue 2: Provide Adequate and Meaningful Opportunities for Community Involvement.

Activity 2A: Hold Public Meetings

- **Objective:** Update the community on OU2 developments and address community questions, concerns, ideas, and comments.

- **Method:** EPA will schedule, prepare for, and attend all announced meetings. EPA will provide at least two weeks' notice of the scheduled meeting. Project Manager, Community Involvement Coordinator, and other appropriate EPA staff will attend.
- **Timing:** A public meeting is required during the Proposed Plan comment period. EPA will hold public meetings as appropriate.

Activity 2B: Encourage formation of Community Advisory Group (CAG)

- **Objective:** Provide the community with a meaningful way to become actively involved, and to provide the Site Team with a viable means of learning citizen concerns and attitudes.
- **Method:** EPA will encourage the formation of a CAG and provide support as appropriate to facilitate its formation. If formed, EPA will provide administrative support but will not be an active member.
- **Timing:** EPA will respond to any requests for help to form a CAG. As necessary, EPA will promote CAGs regularly throughout the Superfund process until one is formed.

Activity 2C: Technical Assistance Grant (TAG) Information

- **Objective:** Provide resources for community groups to hire technical advisors who can assist them in interpreting technical information about the site.
- **Method:** EPA will provide information about the TAG program at public meetings and in site fact sheets. EPA will also provide briefing sessions to interested groups if so requested. EPA will provide TAG applications to qualified groups, and will provide assistance to the group in completing the application
- **Timing:** EPA will continue to promote TAGs until one is awarded.

Activity 2D: Solicit Comments During a Public Comment Period.

- **Objective:** Give community members an opportunity to review and comment on various EPA documents, especially the Proposed Plan. This provides the community with meaningful involvement in the process and also provides the Site Team with valuable information for use in making decisions.
- **Method:** EPA will announce each comment period separately. Announcements will appear in local newspapers and EPA fact sheets and will include information on duration of the public comment period, how to make comments, where to submit comments, etc.
- **Timing:** Comment periods will be announced as appropriate. A comment period is required in conjunction with the announcement of the Proposed Plan and will be open for a minimum of 30 business days.

Activity 2E: Prepare and Issue a Responsiveness Summary

- **Objective:** Summarize comments received during the public comment periods, to document how the EPA has considered those comments during the decision making process, and provide responses when warranted.
- **Method:** EPA will prepare a Responsiveness Summary as a section of the Record of Decision. The Responsiveness Summary will include four sections

ED_002396_00001599-00012

1. Overview; 2. Background on Community Involvement; 3. Summary of received comments and Agency responses; and 4. Remedial Design/Remedial Action concerns. All information, both technical and nontechnical, will be conveyed in a manner that is easily understood.

- **Timing:** EPA will issue the Responsiveness Summary as part of the Record of Decision.

Activity 2F: Revise the Community Involvement Plan (CIP).

- **Objective:** Identify and address community needs, issues, or concerns regarding the Site or the cleanup remedy that are not currently addressed in this CIP.
- **Method:** The revised CIP will update the information presented in the previous version of the CIP. EPA will also attend community business meetings as needed or warranted and provide key stakeholders with fact sheets or briefing materials.
- **Timing:** EPA will revise the CIP as community concern warrants or every three years until the Site is closed, and following the Record of Decision (ROD).

ED_002396_00001599-00013

Appendix A: EPA & CDPHE Site Contacts

Nicole Bein
Remedial Project Manager
U.S. EPA, Region 8
1595 Wynkoop St.
Denver, CO 80202
303-312-7075
800-227-8917 x7075
bein.nicole@epa.gov

Sam Garcia
Remedial Project Manager
U.S. EPA, Region 8
1595 Wynkoop St.
Denver, CO 80202
303-312-6247
800-227-8917 x6247
garcia.sam@epa.gov

Chris Wardell
EPA Community Involvement Coordinator and Public Affairs Specialist
1595 Wynkoop Street
Denver, CO 80202-1129
303-312-6601 or 1-800-227-8917
wardell.christopher@epa.gov

Fonda Apostolopoulos
State Project Manager
Colorado Dpt. of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530
303-692-3411
Fonda.Apostolopoulos@state.co.us

Warren Smith
State Community Involvement Coordinator
Colorado Dpt. of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530
303-692-3373
warren.smith@state.co.us

ED_002396_00001599-00014

Appendix B: VB/I-70 OU2 Site Contacts

ED_002396_00001599-00015

Association/Department	Contact Name/Title	Mailing Address	Contact Information
Denver City and County Mayoral Office	Mayor John W Hickenlooper	1437 Bannock St Room 350 Denver, CO 80202	720-865-9000 720-865-9016
Denver City Council District 9	Councilwomen Judy Montero	3457 Ringsby Court Ste 215 Denver, CO 80216	Phone: 303.458.8960 Fax: 303.964.1021 Email: judy.montero@denvergov.org
Governor's Office	Governor Bill Ritter	136 State Capitol Denver, CO 80203-1792	Phone: 303 866-2471 Email: governor.ritter@state.co.us
Colorado State Legislature	Colorado State Senator, District 31 Pat Steadman	200 E. Colfax Denver, CO 80203	Phone: 303-866-4861 E-mail: pat.steadman.senate@state.co.us
Colorado State Legislature	Colorado State Representative, District 5 Joel Judd	200 E. Colfax Denver, CO 80203	Phone: (303)866-2925 E-Mail: repjoeljudd@joeljudd.com
U.S. Congress	Senator Michael Bennet	2300 15th St. Suit 450 Denver, CO 80202	Phone: 303-455-7600

ED_002396_00001599-00016

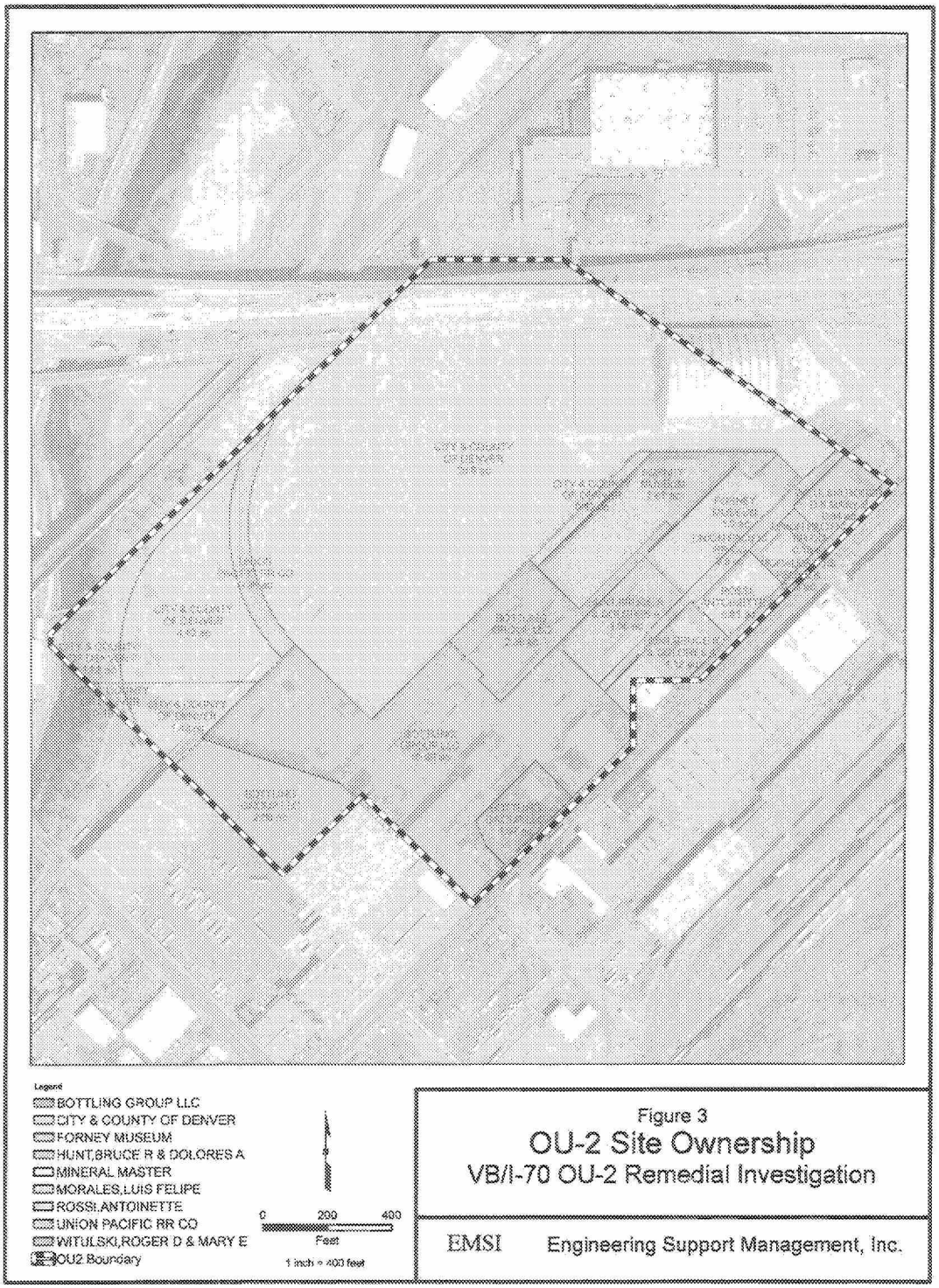
Association/Department	Contact Name/Title	Mailing Address	Contact Information
U.S. Congress	Senator Mark Udall	999 18th St North Tower Suit 1525 Denver, CO 80202	Phone: 303-650-7820
U.S. Congress	Congresswoman Diana DeGette	600 Grant St. Suit 202 Denver, CO 80203	Phone: 303-844-4988
Colorado Dpt. of Public Health and Environment	Fonda Apostolopoulos State Project Manager	4300 Cherry Creek Drive South Denver, CO 80246-1530	Phone: 303 692-3411 Email: Fonda.Apostolopoulos@state.co.us
Colorado Dpt. of Public Health and Environment	Warren Smith State Community Involvement Coordinator	4300 Cherry Creek Drive South Denver, CO 80246-1530	Phone: 303 692-3373 Email: warren.smith@state.co.us
City and County of Denver Department of Env. Health/Division of Env. Quality	Lisa Farrell Environmental Chemist	200 W. 14th Ave., Suite 310 Denver, CO 80204	Phone: 720-865-5439 Email: Lisa.Farrell@denvergov.org
Elyria Swansea Business Association	Larry Burgess President Elyria Swansea Business Association	Personal Matters / Ex. 6	
Forney Museum	Christof Kheim Museum Director		
Pepsi Bottling Group	Dan Frauenfelder Process Compliance Manager		

ED_002396_00001599-00017

Association/Department	Contact Name/Title	Mailing Address	Contact Information
CVJ Axles	Stephen Skirrow President	Personal Matters / Ex. 6	
Salta VW/Audi	Erika Lucero President/Manager		
Zeppelin Development	Mickey Zeppelin President		
National Western Stock Show	Patrick A. Grant President and CEO		
Lightly Treading	Paul Kriescher Principal		
Blaylock Mueller Sales	Mike Blaylock Sr.		
ChopFathers			
Amen Packaging	Bernadette Oddonnel		
Colorado Law Dawg	Michael Nester		

ED_002396_00001599-00018

Appendix C: Site Map



INFORMATION REPOSITORY
Valdez-Perry Library
4690 Vine Street Denver, CO

ED_002396_00001599-00020