

Vasquez Boulevard & Interstate 70 (VB/I-70) Superfund Site

Community Involvement Plan Addendum
For the Removal Action at Operable Unit 2 (OU2) – Former
Omaha & Grant Smelter Location– Globeville Landing Outfall
Project

June 2016

Report Prepared by:

U.S. Environmental Protection Agency
Region 8
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Introduction

This Community Involvement Plan has been developed as part of the community involvement requirements set forth by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and as stipulated in the regulations that interpret the Superfund legislation: The National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The NCP requires a Community Involvement Plan for all removal actions lasting longer than 120 days and for all sites listed on the National Priorities List (NPL), commonly known as Superfund Sites. The purpose of a Community Involvement Plan is to identify the concerns of people affected by a Superfund Site and develop methods to address those concerns. This Community Involvement Plan has been developed for a removal action expected to last longer than 120 days, occurring at the Vasquez Boulevard & Interstate 70 (VB/I-70) Superfund Site, Operable Unit 2.

Site Description & History

In 1999, the U.S. Environmental Protection Agency (EPA) placed the VB/I-70 site on the National Priorities List, a list of sites across the nation commonly referred to as Superfund sites. The issue was heavy metals contamination in residential soils at potentially more than 4,500 properties in all or part of six neighborhoods in north Denver: Cole, Clayton, Swansea, Elyria, northern Curtis Park, and southwest Globeville. Additionally, the two former smelters located near the residential areas were contaminated by heavy metals in soils and groundwater. For administrative purposes, EPA divided the VB/I-70 Superfund site into three Operable Units. Operable Unit 1 (OU1) includes the residential properties where investigation and cleanup work was completed in 2014. The location of the former Argo Smelter is considered Operable Unit 3 (OU3). OU3 is a commercial/industrial area in a major area transportation corridor, heavily impacted by Interstates 70 and 25 which continues to be investigated. Operable Unit 2 (OU2) is the location of the former Omaha & Grant Smelter Site. This Community Involvement Plan is focused on a removal action which will be conducted at OU2.

OU2 – the former Omaha & Grant Smelter location is comprised of 50 acres in north Denver, bordered on the north by I-70, on the west by the South Platte River, on the south by 38th Avenue, and on the east by Brighton Boulevard. Modern day features at the OU2 site include the Globeville Landing Park, Denver Coliseum, I-70, railroad facilities, Pepsi bottling facility, and other businesses. Land use at OU2 is predominately industrial or commercial with limited recreational uses at Globeville Landing Park and along the South Platte River. The city and county of Denver constructed the 10-acre Globeville Landing Park and the final link to the Greenway Trail along the South Platte River in the 1970s. Approximately 7.2 acres of the park are within OU2.

The Grant smelter originally operated in Leadville, Colo. from 1878 until 1882. The Grant Smelting Company, an unincorporated company, owned it. When the Grant Smelter was destroyed by fire in 1882, the smelter was rebuilt in Denver. Starting on July 2, 1882, the Grant Smelter shipped bullion to the Omaha Smelting and Refining Company in Omaha, Nebraska. On July 5, 1883, the Grant Smelter merged with the Omaha Smelting and Refining Company to form the Omaha & Grant Smelting Company. The Omaha & Grant Smelting Company joined other smelting companies to form the American Smelting and Refining Company. The American Smelting and Refining continued to operate the Omaha & Grant Smelter until 1902. The American Smelting and Refining Company changed its name to Asarco Incorporated on May 15, 1975.

The Omaha & Grant Smelter facility was built on approximately 67 acres bordering the South Platte River. The facility was in full operation by November 1882 with eight blast furnaces. In 1887, the Omaha & Grant Smelter installed additional roasters bringing the total number of roasters to 29. On January 1, 1892, the Omaha & Grant Smelter expanded adding eight new smelting and 20 new roasting and fusing furnaces. In 1892, a 352-foot tall smelter stack was built.

The Omaha & Grant Smelter facility employed a lead smelting process to produce gold, silver, copper, and lead. The smelter process involved combining ore, fuel, and flux (typically lime and slag) to separate the metallic components and form a melted product known as bullion. As a result of this process, lead and silver would sink to the bottom of an iron chamber and the slag would float on the surface of the liquid metals. Although detailed information about the wastes from the smelting operations is not available, it is known that blast furnace slag was produced from the smelting operations. Ores, fuel, and flux were delivered to the furnace charging doors on the upper levels of the smelter. Slag was removed as melting operations proceeded. Smelter workers would run slag into a dump and load bullion onto rail cars. An 1890 Sanborn Fire Insurance Map identifies a slag dump to the north of the Omaha & Grant Smelter property.

The Omaha & Grant Smelter closed in 1903 and the smelter buildings were subsequently demolished. Sometime after demolition of the smelter, all of the slag, except for any residual slag that might be buried below modern parking areas, was removed from the facility for use in paving or similar uses. Based on historic air photos, all of the visible slag was removed by 1949.

Various portions of the facility were deeded to the city and county of Denver between 1920 and 1947. Other portions of the facility have been or may continue to be owned or operated by the Union Pacific Railroad, the Pepsi Bottling Group, and various other corporate entities or individuals.

On December 15, 1936, the city and county of Denver 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, the city and county of Denver revived the plan to use the Omaha & Grant Smelter stack as a city trash incinerator. As of November 19, 1944, Denver had only conducted tests at the stack. 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 city and county of Denver on February 22, 1950.

The city and county of Denver constructed the Denver Stadium and Coliseum circa 1950 which encompassed part of the northeast portion of the former Omaha & Grant smelter facility.

The Globeville Landing Park is located along the east side of the South Platte River, across the southwestern portion of the former Omaha & Grant smelter facility. The park was constructed in 1970 by the Platte River Development Committee, which in 1977 became the South Platte River Greenway Foundation.

In 1992, the Colorado Department of Public Health & Environment (CDPHE) issued the Omaha & Grant Smelter Site Preliminary Assessment (PA). The PA concluded that the long industrial history of the area had led to widespread soil and groundwater contamination in the vicinity of the Omaha & Grant Smelter Site. Onsite disposal of smelter wastes likely occurred at the site, evidenced by the discovery of black fill material east of the Denver Coliseum, though evidence of onsite disposal was not documented in the various site assessments performed in the vicinity of the Omaha & Grant Smelter Site. However, these assessments did document volatile organic compound and petroleum hydrocarbon contamination to neighboring groundwater. Metals contamination has also been documented in the surface soils.

EPA initiated a remedial investigation of the smelter facilities in the spring of 2000. This comprehensive study evaluated heavy metal contamination in the groundwater, sediments, soils, and air in the vicinity of the former Omaha & Grant smelter facility. In January 2010, EPA and the city and county of Denver finalized a Remedial Investigation Report. The year before, in 2009, EPA finalized a Baseline Human Health and Screening Level of Ecological Risk Assessment for OU2. Based on the results of the risk assessment and a review of existing data largely from the remedial investigation, 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. The occurrences of arsenic and lead in the soil at concentrations greater than background levels are localized and discontinuous. Sample results did not show broad areas of contamination but only isolated areas of arsenic and lead above background levels.

Due to the presence of buildings and pavement that reduce erosion, wind-blown dust, or storm water runoff containing contaminants, significant transport and migration of the arsenic and lead from soil is not expected to occur. Commercial workers and construction workers on the site who have direct contact with soil at OU2 might ingest small amounts of soil 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 for residential use, hypothetical future residents could be exposed to surface soil at the site.

Although the remedial investigation report and risk assessment have been completed for OU2, a feasibility study that evaluates cleanup alternatives, a proposed cleanup plan, and a Record of Decision detailing a final cleanup plan is yet to be developed for OU2. Crews continue to conduct additional groundwater sampling and investigation.

Globeville Landing Outfall Project

In the course of investigating the OU2 site, it was determined that the soil in the Globeville Landing Park area is mainly clean fill that was brought in from other areas during the park construction. Therefore, evaluation of this pathway was not needed in the OU2 risk assessment. EPA determined that the surface soils of Globeville Landing Park do not pose any unacceptable risk to human health or the environment. In an April 2003 letter from EPA to the city and county of Denver, EPA states:

“Onsite disposal of smelter wastes was common practice at the turn of the century. Potential evidence of onsite disposal is the black fill material discovered west of the Denver Coliseum. EPA’s preliminary assessment for the Site (“the PA”) referenced a subsurface investigation within an area bounded by Interstate 70, Washington Street, and Brighton Boulevard, where elevated concentrations of arsenic, barium, copper, lead, manganese, silver, and zinc were found at one location. Therefore, EPA initially determined that potentially contaminated exposed surface soils may present a direct contact or ingestion hazard to humans. However, the sampling results you submitted to EPA in the report entitled “Globeville Landing Park Soil Sampling Plan & Results”(CH2MHill, October 2002), show that the levels of arsenic and lead found in the surface soils of Globeville Landing Park are not elevated. Further, given the current and reasonably anticipated future land use of the park, EPA does not expect exposure to these soils would pose any unnecessary health risk to recreational users or City employees who perform routine maintenance activities on-site. We therefore grant your request that the surface soils of Globeville Landing Park be removed from the OU#2 study area.”

EPA goes on to state in the letter that the same determination cannot be said for groundwater below the surface of the park. The letter states:

“While EPA now believes that exposure via the groundwater pathway is unlikely due to the industrial/commercial nature of OU#2, we cannot rule out potential risk

to human or environmental receptors from groundwater that may flow under or emanate from OU#2.”

Recently, the city and county of Denver approached EPA with plans for the Globeville Landing Outfall Project (GLO). GLO is an element of the city and county of Denver’s larger Platte to Park Hill Stormwater Drainage project, and traverses the VB/I-70 Superfund Site OU2 through both the Denver Coliseum parking lot and the Globeville Landing Park. The Coliseum parking lot is underlain by a landfill that predates the Resource Conservation and Recovery Act (RCRA) of 1984. The Globeville Landing Park is underlain by soil mixed with construction debris. EPA agreed that the city could conduct the GLO project through the Superfund site with EPA oversight.

On July 2, 2015, EPA issued an Administrative Order on Consent and Action Memo to the city which detailed the environmental components that had to be addressed in this removal action. These include (1) the management and disposal of Waste Material; (2) management and, if necessary, treatment and/or disposal of dewatering liquid during construction; and (3) design and construction of an impermeable barrier system to prevent any Waste Material remaining onsite from adversely impacting stormwater retained within and conveyed by the stormwater drainage feature, as well as prevent stormwater infiltration into contaminated media remaining onsite.

EPA approved the city’s design plan, including a Materials Management Plan. The Methane, Odor and Dust Control Plan was developed to detail protocol for monitoring of combustible gases, odors, and fugitive dust, to identify mitigation measures for these parameters, and to present plans for communicating with the communities that could be affected by nuisance odors and fugitive dust. The city and county of Denver are the lead for this project, including communications and outreach. EPA provides oversight.

To view the city’s design plan, Materials Management Plan, and other guiding documents for this project, please visit the following Website:

<http://www.denvergov.org/content/denvergov/en/environmental-health/environmental-quality/land-use-and-planning.html>

Summary of Community Concerns

Numerous interviews about the Globeville Landing Outfall Project were conducted by the city and county of Denver staff with their contractor as part of the Platte to Park Hill Stormwater Project. A summary of those community interviews follows:

MEMORANDUM

TO: Bret Banwart, Cincere Eades, Chris Proud, Dean Pearson

FROM: Angela Woolcott, Olivia Moffett, Andy Mountain

RE: Draft Globeville Landing Outfall Input Summary

DATE: December 8, 2015

CC: Kelly Leid, Erika Martinez, Jamie Price, Jenn Hillhouse

In an effort to educate and gather input from the community on the future of Globeville Landing Park, a series of interviews, meetings and events were executed between September and November 2015. Below is a high-level summary of the outreach conducted and feedback received.

- 1. One-on-one meetings:** The project team conducted one-on-one meetings with eight different individuals with a vested stake in the Globeville Landing Outfall project and design of Globeville Landing Park. The individuals represented organizations including Globeville Civic Partners, United Community Action Network, Globeville K.A.R.E.S., Globeville Elyria Swansea Business Association, Greenway Foundation and Colorado State University.
- 2. Small Group Meetings:** The project team provided an update on Globeville Landing to the National Western Center Citizens Advisory Committee at its September meeting. In addition, a collection of local property owners/developers was convened in mid-September, where an update on the project was provided.
- 3. Stakeholder Working Group:** Two meetings (the first in mid-October and the second in mid-November) have been held with the project's Stakeholder Working Group. The group is comprised of representatives from Registered Neighborhood Organizations, business organizations and educational institutions within and around Cole, Globeville, Elyria, Swansea, River North, City Park, Clayton and Northeast Park Hill. Input from this group was used to help inform and refine design options for Globeville Landing that were shared with the public at the public meeting.
- 4. Public Meeting:** On November 17th, 2015, the project team held a public meeting at Bruce Randolph School. At the meeting, they presented and sought feedback on the conceptual design of Globeville Landing Park by asking attendees which amenities would be most important to them in a future park. Over 50 residents attended the meeting, with many providing feedback on Globeville Landing Park.

Input Received

The bullets below summarize the collective input from all outreach and input to date. The "common themes" section identifies ideas and priorities that were fairly common among all input gathered. The "additional thoughts" section identifies ideas and priorities that weren't mentioned by multiple individuals, but were strongly held opinions by those that articulated them.

Common Themes:

- **Safety and Security** – This is a significant concern. Stakeholders want the design to address current issues of drug dealing and homelessness.
- **Programming and Maintenance** – The existing park is underutilized, outdated and poorly cleaned/maintained. Establish an approach to park programming that better activates the space. Maximize the use of the large open space on the north side of the park.
- **Water Quality** – Ensuring that the drainage improvements incorporate a significant amount of water quality benefits.
- **River Access** – Providing improved/increased access to the river.
- **Bicycle/Pedestrian Amenities** – Integration with the South Platte River Trail as well as improved opportunities for individuals and family to enjoy and engage in the park.
- **Access from Surrounding Areas** – Connectivity to the nearby communities and especially the redeveloping areas in RiNo (both commercial development as well as the new RiNo Park) are important.
- **Education** – Partner with CSU and/or others to incorporate an outdoor classroom/educational component.

Additional Thoughts:

- Don't let the design and construction of this project negatively impact Brighton Boulevard Construction
- Do not become overly technical about the park when engaging the public
- Incorporate this project with already existing neighborhood plans
- Make a peaceful space
- A plan for odor control surrounding the water
- Creation of multi-use shelters
- Maintain a "natural look" in the outdoor space

Community Involvement and Outreach Activities

Notice and Availability of Administrative Record: and associated 30-day comment period published in the Denver Post on September 7, 2015. No comments were received.

Community Interviews: Interviews were conducted mainly by the city and their contractor as part of the Platte to Park Hill Project (See above summary).

Community Involvement Plan: Issued in July 2016.

Information Repository Establishment and Notification/Notice of Availability of Administrative Record: The information repository is located at the city and county of Denver offices. This was included in the public notice that ran in the Denver Post on September 7, 2015.

Public Meetings/Information Sessions/Individual Meetings: City staff have conducted numerous meetings where the Globeville Landing Outfall project was specifically discussed (see above section). Additional meetings, individual and group, will be convened through 2016.

Additional Outreach: The city and county of Denver is leading additional community outreach activities, as referenced in the Materials Management Plan, appendix C of the design plan (see the Website referenced above to view these documents). The additional community outreach activities described in the Materials Management Plan are as follows (“respondent” in the excerpt from the Materials Management Plan below refers to the city and county of Denver):

COMMUNICATIONS AND REPORTING

Effective communications and reporting procedures are critical for disseminating odor and fugitive dust monitoring results to parties that need to receive them. Appropriate parties must be made aware of results that indicate potentially adverse impacts to off-site populations. Similarly, real-time operational decisions may at times be based on timely and effective communication of monitoring results. This section addresses the mechanisms by which monitoring data and results are communicated to those in need of the information.

All community-directed communication efforts will be made available in English and in Spanish.

Respondent will implement a community outreach effort that will focus on residential and commercial areas that may be affected by methane, odor, or fugitive dust conditions and other community impacts. The plan will communicate the following to stakeholders:

- The potential for methane, odors, and dust, and areas that may be affected;
- What means the contractor is taking to keep control these releases;
- Expected duration of possible releases; and
- Mechanisms for the stakeholders to get more information or voice concerns.

Stakeholders include commercial property owners and businesses, and residents within the Outreach area delineated on Figure C-2 of the Final Design Report found at the

following project Website:

<http://www.denvergov.org/content/denvergov/en/environmental-health/environmental-quality/land-use-and-planning.html>. Stakeholders will be informed through the communication vehicles listed below. Should complaints arise from areas beyond this Outreach area, additional stakeholder involvement and communications efforts will be developed and the Outreach area will be expanded. Such expanded Outreach will also be culturally relevant and communications will be in English and Spanish.

1.1 Communication Mechanisms

Several communication mechanisms will be provided, as discussed below.

Project Hotline

Callers with complaints, concerns or inquiries should first call the North Denver Cornerstone Collaborative Hotline at 720.865.2900.

Alternatively, callers may contact Denver's 311 call center, which will direct the call appropriately, either to the Globeville Landing Outfall Project management team for general issues, or to Denver Environmental Health's complaint system. Normal complaint response procedures will be followed for odor and/or fugitive dust complaints.

Fact Sheet

A general project Fact Sheet will be created that will outline the overall project, schedule for excavation and construction, community impacts (including odors and dust), phone numbers for non-emergency situations and to voice concerns and the website address. The fact sheet will describe the overall project and outline the possibility of odors and dust, means taken to minimize them, how they can get more information and can call with specific complaints to the Project Hotline or Denver 311. The fact sheet will be in both English and Spanish and will be provided to all residents and businesses within the Outreach area and beyond, as appropriate.

Personal Visits and/or Phone Calls

Respondent has already met with many local business and land owners surrounding the project to discuss the redevelopment impacts including odors and dust. All will be sent or given a Fact Sheet as well.

City of Denver Newsletter

The North Denver Cornerstone Collaborative newsletter will include information on the project and is published every month. It will include instructions for calling the Project Hotline, Denver 311, and project contacts.

1.2 Complaint Response Procedures

The following steps will be taken in response to complaints from residents and business owners in the Outreach area and beyond, as appropriate. As noted, above, callers with complaints, concerns or inquiries should call the Project Hotline or Denver's 311 call center.

1.3 Routine and Special Reporting

Whenever the odor action level is exceeded, the Site Supervisor will be notified immediately by Odor Monitoring personnel so that appropriate mitigation actions can be directed to and implemented by the proper parties through the response chain of command. Quarterly summary reports documenting odor monitoring locations, times, and results, as well as meteorological conditions, will be prepared and submitted to the TCHD.

1.4 Data Reporting

Odor monitoring data will be maintained on-site. Data will typically be available to personnel involved in remediation and odor monitoring activities within one week. This immediate access will allow project personnel to track any existing odors and their impact on operations, and allow for comprehensive quality control checks to be performed on the data.

Contacts

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Information about the Globeville Landing Outfall Project can also be found at:

<http://www.denvergov.org/content/denvergov/en/environmental-health/environmental-quality/land-use-and-planning.html>

The administrative record is available at the information repositories listed below:

City and County of Denver • Department of Environmental Health

Environmental Quality Division

200 W 14th Avenue, Suite 310, Denver, CO 80204

Records may be viewed by appointment only - call Rose Maes at 720-865-5470

EPA Superfund Records Center

1595 Wynkoop St., Denver, CO 80202

Records may be viewed by appointment only - call 303-312-6601