

### 3.11 HAZARDOUS MATERIALS

Areas within the project area that are contaminated or potentially contaminated with hazardous materials have been considered as a part of this DEIS. The term hazardous materials includes solid waste, hazardous waste, and other wastes contaminated with hazardous materials, radioactive materials, petroleum fuels, toxic substances, pollutants, and other contaminants as defined by and regulated by various state and federal laws. Lead-based paint may be present on bridges and in buildings, and asbestos may also be present in buildings. Sites with these conditions are referred to as a recognized environmental condition (REC). In addition to RECs, "areas of potential environmental concern" have been identified to address those environmental issues that do not specifically meet the definition of a REC but do warrant further consideration.

The discovery of hazardous materials can potentially affect a proposed project in terms of cost, schedule, and agency/public involvement. Potential hazardous material sites must be identified so that they can be avoided, if reasonably possible. If they cannot be avoided, then it is important that these areas are identified so that appropriate corrective actions can be taken to protect the health and safety of the public and workers during construction and maintenance and to ensure proper disposal of hazardous materials disturbed by construction activities.

To identify potential hazardous material site locations, hazardous material assessments are conducted prior to the selection of the Preferred Alternative and acquisition of right-of-way (ROW). Within the project area, a Phase I Initial Site Assessment (ISA) was conducted to identify any sites that may present a potential for environmental contamination. The Phase I ISA was conducted in accordance with the American Society of Testing and Materials (ASTM) practice E1527-00, *Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process*, and included a records search of standard state and federal sources, as well as field review by a qualified environmental professional.

**What is a Recognized Environmental Condition (REC)?**

A REC is defined in American Society of Testing and Materials practice E1527-00 as a condition that indicates an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the property or into the ground, groundwater, or surface water of the site.

#### 3.11.1 Affected Environment

Twelve sites were identified as potential hazardous material sites during the Phase I ISA: seven REC sites and five areas of potential environmental concern. These sites are individually described below and illustrated in Exhibits 3.11-1, 3.11-2, and 3-11.3.

#### 3.11.2 Recognized Environmental Condition Sites

The following seven sites are considered RECs.

##### *River Street Property*

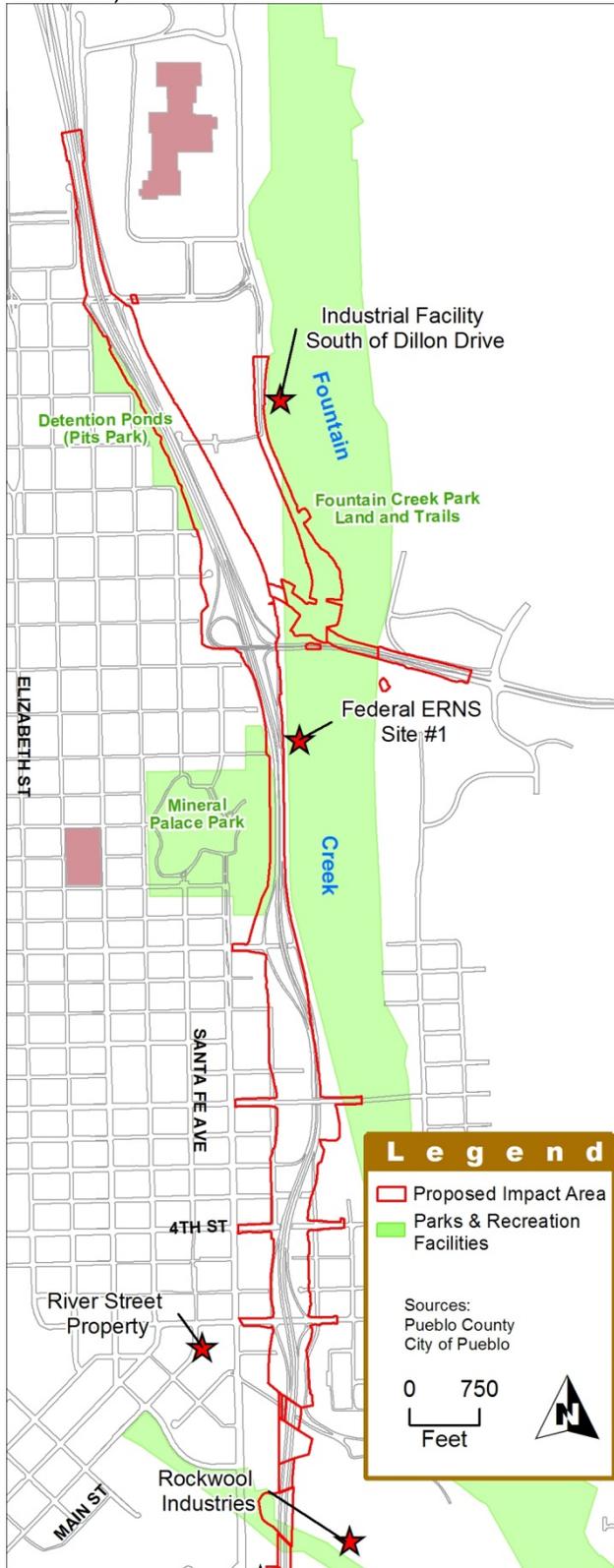
The State of Colorado maintains a list of sites that have been accepted for cleanup as part of the Colorado Voluntary Cleanup Program, which is intended for sites that have not been covered by existing regulatory programs. The River Street property is part of the Voluntary Cleanup Program. It is located near the Convention Center and is bordered by River Street to the north, I-25 to the east, Santa Fe Avenue to the west, and a dirt road to the south. The site's

soils were contaminated with various chemicals that were removed in 1997. Following the soil removal activities, the site received a No Further Action Determination from the Colorado Department of Public Health and Environment (CDPHE) for commercial or industrial uses compatible with the nearby Convention Center. Groundwater beneath the site is contaminated with bis-2-ethylhexylphthalate, a chemical commonly added to plastics to make them flexible; however, the source of contamination was detected offsite. Because of this, the River Street property is considered a REC.

##### *Rock Wool Industries*

The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database includes information on potential and actual hazardous material sites that have been reported to the U.S. Environmental Protection Agency (EPA). The CERCLIS No Further Remedial Action Planned (NFRAP) database provides information regarding CERCLIS sites that have been designated as NFRAP and removed from

**EXHIBIT 3.11-1**  
Potential Hazardous Material Sites in the Project Area (Both Build Alternatives): North Area



**EXHIBIT 3.11-2**  
Potential Hazardous Material Sites in the Project Area (Existing I-25 Alternative): South and Central Area

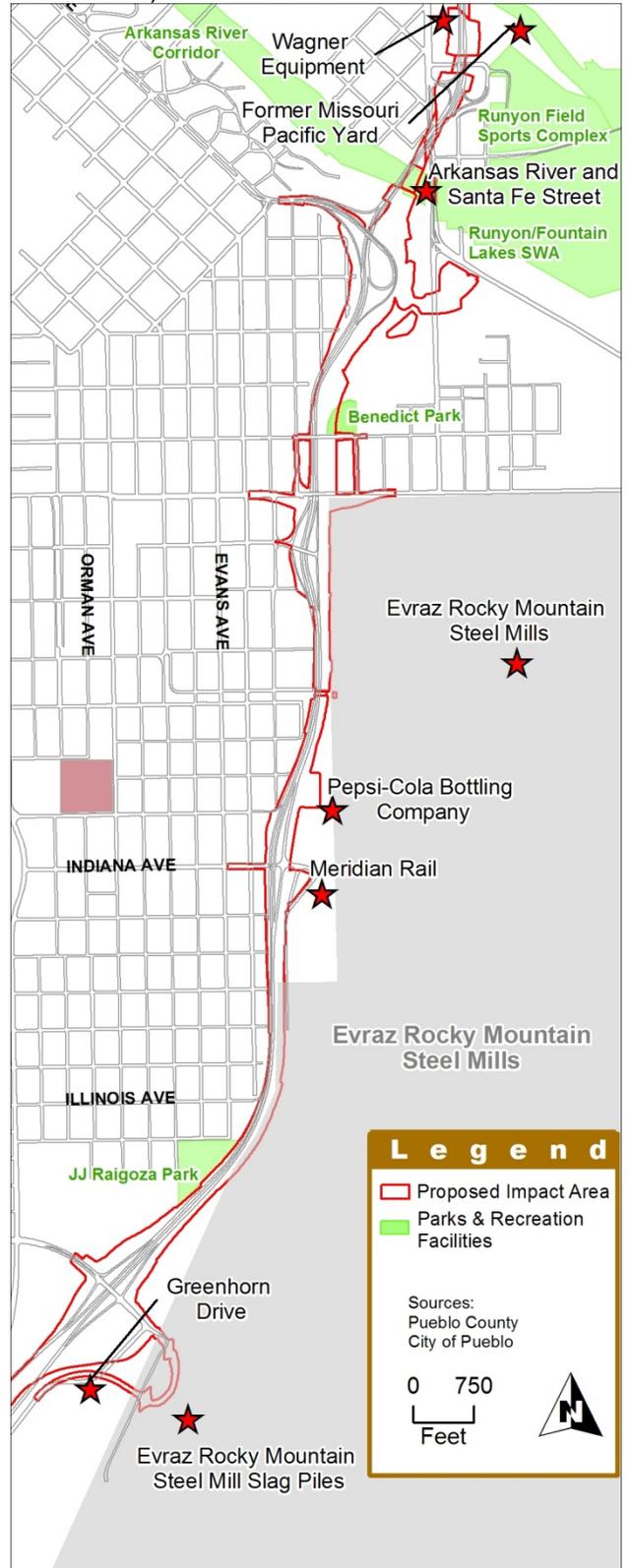


EXHIBIT 3.11-3  
Potential Hazardous Material Sites in the Project Area (Modified I-25 Alternative): South and Central Area



CERCLIS. These NFRAP sites may be sites where no contamination was found following an initial investigation, the contamination was removed quickly without the site being included on the National Priority List (NPL), or the contamination was not serious enough to require NPL consideration.

The Rock Wool Industries facility is listed on the NFRAP. The 39-acre site is located adjacent to the eastern side of I-25 near the confluence of Fountain Creek and the Arkansas River, north of the Runyon Field Sports Complex. The facility produced mineral fiber insulation using slag (a byproduct of the metal smelting process) and coke (a fuel derived from coal). A shot pile (an abrasive used for sandblasting steel) located along the western 12 acres adjacent to I-25 was landfilled onsite in the early 1990s. A boiler evaporation pond that received wastewater from the boiler and baghouse dust facilities was located adjacent to the shot pile. At one point, the site had three underground storage tanks, an above-ground storage tank for tar storage, an oil storage tank, and two resin tanks. Historic references indicate that a smelter (essentially, a large furnace) processing silver ores operated on the site from approximately 1880 to 1920. Rock Wool Industries is considered a REC.

#### *Former Missouri Pacific Yard*

The former Missouri Pacific Yard, located adjacent to I-25 to the east and north of the Runyon Field Sports Complex, is part of the Colorado Voluntary Cleanup Program. The parking lot for the Runyon Field Sports Complex forms the southern boundary of the site. Soils at the site were found to have elevated levels of total petroleum hydrocarbons, arsenic, and lead. Groundwater has also been impacted by metals, primarily arsenic, cadmium, chromium, lead, and selenium. Selenium is the only constituent present above maximum contaminant levels, and it is believed to originate from an offsite source. The site received a No Further Action Determination Approval for industrial use in 2003. The former Missouri Pacific Yard is considered a REC.

#### *Arkansas River and Santa Fe Street*

The Arkansas River and Santa Fe Street site is listed in the CERCLIS database. No decision has been made whether to include this site on the NPL. This site, also known as the Boston and Colorado Smelter according to CDPHE records, is bounded by Santa Fe Drive to the southwest, the south

bank of the Arkansas River to the north, Main Street to the northwest, and Colorado Street to the east. The Boston and Colorado Smelting Company was established in 1883 and dismantled in 1915. There were historically six smelters located in and around this area.

The site contains a large slag heap, forming a 30-foot-high escarpment along the western side of Santa Fe Avenue. Water leaching through this waste slag pile may be impacting groundwater at the site. Sampling has indicated that the following compounds exceed Superfund Chemical Data Matrix soil benchmark standards for one or more samples: aluminum, antimony, arsenic, barium, beryllium, cadmium, calcium, chromium, cobalt, copper, cyanide, iron, lead, magnesium, manganese, mercury, nickel, potassium, selenium, sodium, thallium, vanadium, and zinc. In samples collected at the site, arsenic, chromium, and lead exceed CDPHE standards for residential soil. The Arkansas River and Santa Fe Street site is considered a REC.

#### ***Evrax Rocky Mountain Steel Mills***

The Evrax Rocky Mountain Steel Mills facility is an operating steel mill located east of the current I-25 alignment, stretching from Northern Avenue past Pueblo Boulevard. A total of 82 onsite solid waste management units (SWMU) are being investigated by the site owner and remediated at the site, as required by the facility's Resource Conservation and Recovery Act (RCRA) permit, issued by the CDPHE under 6 Code of Colorado Regulations 1007-3, Part 100 (CDPHE hazardous waste rules).

Only two of the 82 SWMUs (SWMU 69 and SWMU 80) are within the ROW boundary for both Build Alternatives for this project. Until 1981, SWMU 69 was used to manage particulates removed from the exhaust of the blast furnace and stoves. Until 1964, SWMU 80 was used to manage particulates removed from the blast furnace flue gas. The Evrax Rocky Mountain Steel Mills demolished the above-ground structures at both SWMU 69 and 80 in 1989. The resulting demolition debris, including particulate material, was disposed of offsite. Sampling was conducted in 2001 to determine if there was a release of hazardous constituents to soil at SWMUs 69 and 80 and any remaining particulate material was removed and disposed offsite in a licensed disposal facility. The CDPHE determined that there were no releases of hazardous material to the environment from either SWMU that would warrant remediation. Both SWMUs

were closed in 2001 with a No Further Action Determination by CDPHE. The Evrax Rocky Mountain Steel Mills facility is considered a REC.

Additional relevant information regarding the steel mill site features and alternative impacts is presented in **Chapter 4 – Section 4(f) Evaluation**, as well as in the *Hazardous Materials Technical Memorandum, New Pueblo Freeway* (CH2M HILL, 2004a).

#### ***Pepsi-Cola Bottling Company***

The Pepsi-Cola Bottling Company site consists of an open underground storage tank with groundwater impacted by hydrocarbon and benzene, ethylene, toluene, and xylene. The site is located adjacent to I-25 and is just west of the Evrax Rocky Mountain Steel Mills facility, north of the Indiana Avenue exit from I-25. Groundwater is encountered at approximately 20 to 25 feet below ground surface, and several monitoring wells are located within the project area. Contaminated soils are expected to be encountered near the former tank location in the middle of the parking lot adjacent to I-25. Currently, the site does not have any operating remedial systems and relies on monitoring to detect any free product and determine movement of the benzene plume. The monitoring activity would continue until the site attains closure status from the Colorado Division of Oil & Public Safety (DOPS). The Pepsi-Cola Bottling Company site is considered a REC.

#### ***Evrax Rocky Mountain Steel Mills Slag Piles***

Linear piles of slag from the Evrax Rocky Mountain Steel Mills facility extend south from Indiana Avenue to the southern boundary of the project corridor. Depending on the concentrations and leachability of the metals, the material may be considered hazardous. The Evrax Rocky Mountain Steel Mills slag piles are considered a REC.

### **3.11.3 Areas of Potential Environmental Concern**

The following five sites are considered areas of potential environmental concern.

#### ***Industrial Facility South of Dillon Drive***

An abandoned property is located south of the intersection of Dillon Drive and West 26th Street. This building was noted during field visits and is considered an area of potential environmental concern because of its former industrial use.

***Federal Emergency Response Notification System Site #1***

The federal Emergency Response Notification System (ERNS) is a national computer database that is used to store information on the sudden and/or accidental release of hazardous substances, including petroleum, into the environment. This system has identified a site located 1 mile north of Exit 99A on I-25. The database did not provide any details regarding the nature of the spill. The ERNS website contains records of all reported spills since 1987 but does not provide additional information. Because no information was available to evaluate this site, ERNS Site #1 is considered an area of potential environmental concern.

***Wagner Equipment Company***

Wagner Equipment Company is a RCRA conditionally exempt, small-quantity generator of hazardous waste. It is located at 214 East Ilex Street, directly under an elevated portion of I-25 near the Runyon Field Sports Complex. No releases have been reported from the facility; however, because it is within CDOT ROW, the Wagner Equipment Company site is an area of potential environmental concern.

***Meridian Rail***

The Meridian Rail facility is a RCRA small-quantity generator. The site is located adjacent to I-25 to the east, just south of the Indiana Avenue exit. The northwest corner of the site operates as a parking lot. Releases of chromium, manganese (air release only), and creosote (air and land surface release) have been recorded at the site. This site is an area of potential concern for hazardous materials.

***Greenhorn Drive***

There are several industrial facilities along Greenhorn Drive near the southern end of the project area. The facilities include an auto salvage yard that had a visible drum storage area located near the southern property boundary identified during a 2004 site visit. Because of their industrial use, these sites are considered areas of potential environmental concern.

***Buried Construction Debris***

As with any construction project that involves excavation, there is the potential to unearth buried construction debris. Such unforeseen debris sometimes can include asbestos-containing material that requires special handling and disposal. A qualified asbestos professional would be on hand to properly evaluate any buried construction debris.

**3.11.4 Environmental Consequences**

This section describes the sites that will be directly impacted by the Build Alternatives. The Phase I ISA identifies a number of sites that are adjacent to the study area. More detailed information is included in the *Hazardous Materials Technical Memorandum, New Pueblo Freeway* (CH2M HILL, 2004a).

**3.11.4.1 No Action Alternative**

The No Action Alternative would not disturb any hazardous material sites within the project area. Under the No Action Alternative, the various RECs and areas of potential environmental concern would be addressed through the appropriate regulatory process by the owner(s) of these properties. In the absence of improvements related to this project, there would be no further change to the existing environmental conditions with respect to hazardous materials.

**3.11.4.2 Build Alternatives**

Hazardous materials pose a possible risk for human health and safety and for contamination of other property nearby. Under the Build Alternatives, property that is owned or may be acquired by CDOT would be remediated, if necessary, in accordance with appropriate regulatory processes. Therefore, the Build Alternatives would lower the future health and safety risk for the public as well as for maintenance and utility workers.

Both Build Alternatives would impact RECs and areas of potential environmental concern, with the Existing I-25 Alternative impacting 10 sites and the Modified I-25 Alternative impacting 11 sites. Most of the sites that would be impacted are common to both Build Alternatives, with the exception of the Arkansas River and Santa Fe Street site, which would be impacted only by the Existing I-25 Alternative. The Meridian Rail, Evraz Rocky Mountain Steel Mills slag piles, and former Missouri Pacific Yard sites would be impacted only by the Modified I-25 Alternative.

***North Area***

Both Build Alternatives would impact two areas of potential environmental concern and one REC located in the North Area of the project corridor. The REC is the River Street property; the areas of potential environmental concern are the industrial facility south of Dillon Drive and the federal ERNS Site #1.

**South Area**

Both Build Alternatives would impact the Greenhorn Drive area of potential environmental concern and potentially contaminated soils outside of the Evraz Rocky Mountain Steel Mills slag piles near Pueblo Boulevard, which is a REC.

**Central Area***Existing I-25 Alternative*

The Existing I-25 Alternative would impact three RECs and one area of potential environmental concern in the Central Area of the project corridor. The RECs include the Arkansas River and Santa Fe Street site, the Evraz Rocky Mountain Steel Mills property, and the Pepsi-Cola Bottling Company. The area of potential environmental concern is the Wagner Equipment Company.

*Modified I-25 Alternative*

The Modified I-25 Alternative would impact four RECs and two areas of potential environmental concern in the Central Area of the project corridor. The RECs include the former Missouri Pacific Yard, the Evraz Rocky Mountain Steel Mills property and slag piles, and the Pepsi-Cola Bottling Company. The areas of potential environmental concern are the Wagner Equipment Company and the Meridian Rail facility. Asbestos is suspected at the Evraz Rocky Mountain Steel Mills property, and further testing would be completed during construction.

Both Build alternatives would impact the Pepsi-Cola Bottling Company site, which has several groundwater monitoring wells. The contaminated groundwater would need to be addressed during and after construction, and final design will determine whether the existing monitoring wells would need to be relocated. Regardless, sampling would continue until the site has attained closure status from DOPS.

**3.11.5 Mitigation**

Unless otherwise specified, the following mitigations apply to both the Existing I-25 Alternative and the Modified I-25 Alternative.

- ❖ A site-specific Phase I Environmental Site Assessment (ESA) or ISA will be conducted prior to construction or acquisition of any site. The nature and extent of any soil or groundwater contamination will be assessed to determine whether remediation will be required or modifications to project design can be made.
- ❖ A Phase II ESA may be performed on sites identified as RECs or areas of potential environmental concern. Mitigation will be required if the results determine that there are potential impacts to human health or the environment. Prior to construction activities, a Health and Safety Plan will be developed in accordance with appropriate CDOT specifications.
- ❖ For areas with known soil and groundwater contamination, a Materials Management Plan (MMP), which includes procedures for handling asbestos-containing materials (ACM), and a Health and Safety Plan will be developed in accordance with appropriate CDOT specifications.
- ❖ The level of remediation will be determined in accordance with applicable federal and state laws and based on the final project alignment, ROW requirements, and the degree of subsurface disturbance during construction.
- ❖ Engineering controls will be considered to minimize potential disposal costs and to avoid contamination. Responsible parties will be identified, if needed, to ensure CDOT is not liable for future remediation.
- ❖ If dewatering is necessary, groundwater will be managed in accordance with appropriate CDOT specifications and permitted by the CDPHE Water Quality Control Division.
- ❖ Wells within the construction area will be abandoned and plugged in accordance with appropriate CDOT specifications and in compliance with the Colorado Department of Natural Resources, Division of Water Resources, State Engineer Water Well Construction Rules.
- ❖ Prior to demolition of any structure, the structure will be surveyed for the presence of asbestos, lead-based paint, heavy metals, universal wastes, Toxic Substances Control Act (TSCA) wastes, or miscellaneous hazardous materials. Abatement of regulated material will be in accordance with appropriate CDOT specifications and relevant Occupational Health and Safety (OSHA) requirements. Regulated materials must be removed from any structures prior to demolition and appropriately recycled or disposed.

- ❖ A qualified asbestos professional will evaluate any potentially asbestos-containing materials, including landfill material, construction debris, utilities, or other ACM, in accordance with appropriate CDOT specifications regarding the potential for asbestos-containing construction debris in soil.
- ❖ Byproducts of steel manufacturing shot and slag have been stockpiled at the Evraz Rocky Mountain Steel Mill site and will likely be encountered during construction. Special waste-handling and excavation requirements will be necessary during construction and will be developed once the chemical composition and volume of the material is known. Requirements may include disposal at a landfill that is permitted to accept this type of material, personal protective equipment for workers disturbing these areas, additional dust control measures and monitoring, and decontamination of the construction equipment.