

## 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 FEIS. 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 and asbestos may be present on bridges and 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 E1527-05, *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

Fourteen sites were identified as potential hazardous material sites during the Phase I ISA: Eight REC sites and six 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.**

#### 3.11.1.1 Recognized Environmental Condition Sites

The following 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.

##### **Rockwool 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 CERCLIS.

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



**EXHIBIT 3.11-2**  
 Potential Hazardous Material Sites in the Project Area (Both Build Alternatives): South Area (Phase 2)



**EXHIBIT 3.11-3**

Potential Hazardous Material Sites in the Project Area (Existing I-25 Alternative (L) and Modified I-25 Alternative (Preferred Alternative) (R)): Central Area (Phase 2)



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 Rockwool 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. Based on past site use and the possible presence of hazardous materials, Rockwool Industries is considered a REC.

#### ***Pueblo MOP Yard***

The Pueblo MOP yard is also known as 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 because the site has residual soil contamination.

#### ***Colorado Smelter and Santa Fe (Bridge) Culvert Sites***

These two sites (also known as the Arkansas River and Santa Fe Street sites) are listed in the CERCLIS database.

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 metals and one compound 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 Colorado Smelter and Santa Fe (Bridge) Culvert Sites are considered a REC due to the residual soil contamination and are sources of heavy metal-contaminated groundwater on the sites.

The EPA is currently investigating the extent and types of contaminants associated with this site in order to better determine if the site should be included on the NPL. The EPA will consult with the public and local agencies before making a decision on listing in a Record of Decision (ROD) separate from the CDOT Environmental Impact Statement process. Any recommendations for cleanup will be included in the EPA's ROD.

#### ***Evraz Rocky Mountain Steel Mills (RMSM)***

The Evraz 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 and the area of influence of the project appears to overlap several other SWMUs: 19, 20, 44, 45, and 49. 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 Evraz 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 Evraz Rocky Mountain Steel Mills facility is considered a REC because of the past history of wastes containing heavy metals on the site.

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, 2011d).

#### ***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 Evraz 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 because the facility has

an open leaking tank investigation and the site is adjacent to the project corridor.

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

Linear piles of slag from the Evraz 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 Evraz Rocky Mountain Steel Mills slag piles are considered a REC because of the past history of wastes containing heavy metals on the site.

#### ***Rampart Supply***

This site is a Colorado Voluntary Cleanup Program (VCP) site. It is located near the corner of East 4th Street and Bradford Street in the northern area of the alignment. It is immediately outside of the proposed impact area. An NFA letter was issued for soil conditions at the site; however, groundwater contaminated with benzene, toluene, ethylene, and total xylenes (BTEX) at concentrations above State standards continues to be of concern. The plume is migrating to the east-southeast, and depth to water is expected to be encountered at approximately 30 feet below ground surface. The Rampart Supply site is considered a REC due to the heavy metal-contaminated groundwater on the sites.

### **3.11.1.2 Areas of Potential Environmental Concern**

The following sites are considered areas of potential environmental concern.

#### ***Industrial Facilities South of Dillon Drive***

Located south of the intersection of Dillon Drive and West 26th Street, the area has several industrial facilities; some appear to have been abandoned. The Freeway Truck and Auto Repair site, located at approximately 2400 North Freeway, had several drums in an area directly behind the building; for this reason, the industrial facilities are considered an area of potential environmental concern.

#### ***VAE Nortrak North America (formerly Meridian Rail)***

The VAE Nortrak 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.

**Stoehr Cleaners**

This leaking underground storage tank (LUST) site is located north of the intersection of 29th Street and Elizabeth Street and approximately 800 feet west of the proposed impact area. The shallow groundwater at the site is contaminated with BTEX fuel constituents as a result of a LUST that was removed in 1997. Active remediation is occurring at the site under a DOPS Corrective Action Plan (CAP). Although this site and the groundwater plume are located outside of the proposed impact area boundary, additional monitoring of shallow groundwater during construction may be necessary depending on current site conditions.

**Greenhorn Drive**

There are several industrial facilities along Greenhorn Drive, including a Budweiser facility and an auto salvage yard, near the southern end of the project area. The auto salvage yard had a visible drum storage area located near the southern property boundary identified during a 2011 site visit. The potential to encounter soil and/or groundwater contamination should be considered during construction or demolition of these facilities; therefore, these sites are considered areas of potential environmental concern.

**Silo Building 4392**

This LUST is located approximately 500 feet to the east of the proposed impact area at 3130 North Freeway and west of the Pueblo Mall and was observed during the field reconnaissance. The remediation of this site is being implemented under a DOPS CAP. Additional investigation of a potential methyl tertiary butyl ether (MTBE) plume may be necessary prior to construction in this area. The direction, flow, and velocity of the groundwater plume of MTBE are unknown. The site is outside of the proposed impact area, but additional groundwater monitoring may be necessary if roadway excavation is intended to reach groundwater in the area.

**Cliff Brice Petroleum Warehouse and Bulk Storage Plant**

Several aboveground storage tanks (AST) and portals for underground storage tanks (UST) were identified during the site reconnaissance. At least 22 ASTs are located at the property. Gasoline, diesel, and kerosene are stored in the various ASTs, with volume capacities greater than 1,000 gallons. The proximity of the facility to I-25 and the proposed impact area may necessitate special precautions when conducting construction activities adjacent to this facility.

**3.11.2 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, 2011d). A summary of impacts is shown in **Exhibit 3.11-4**.

**3.11.2.1 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.

**3.11.2.2 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 dealt with in accordance with appropriate regulatory processes.

Both Build Alternatives would impact RECs and areas of potential environmental concern, with the Existing I-25 Alternative impacting 12 sites and the Modified I-25 Alternative (Preferred Alternative) impacting 13 sites. Most of the sites that would be impacted are common to both Build Alternatives, with the exception of the Colorado Smelter and Santa Fe (Bridge) Culvert Sites, which would be impacted only by the Existing I-25 Alternative. The VAE Nortrak and the Pueblo MOP Yard sites would be impacted only by the Modified I-25 Alternative (Preferred Alternative). All of the sites identified as either RECs or areas of potential concern are shown in **Exhibit 3.11-4**.

**North Area (Phase 1)**

Both Build Alternatives would impact four areas of potential environmental concern and two REC sites located in the North Area (Phase 1) of the project corridor. The RECs are the River Street property and Rampart Supply; the areas of potential environmental concern are the industrial facilities south of Dillon Drive, Cliff Brice Petroleum Warehouse/Bulk Plant, Stoehr Cleaners, and Silo Building 4392.

**EXHIBIT 3.11-4**

## Summary of Impacts to Potential Hazardous Material Sites

Site Name	Type of Environmental Concern	Impacted by Existing I-25 Alternative	Impacted by Modified I-25 Alternative (Preferred Alternative)
Colorado Smelter and Santa Fe (Bridge) Culvert Sites	REC (CERCLA)	X	
Rockwool Industries	REC (CERCLA NFRAP)	X	X
Evraz Rocky Mountain Steel Mills	REC (RCRA COR ACT)	X	X
VAE Nortrak Corporation	AOPC (RCRA-SQG)		X
Stoehr Cleaners	AOPC (LUST)	X	X
Silo Building 4392	AOPC (LUST)	X	X
Industrial Facilities Southwest of Dillon Drive	AOPC (Unidentified Drums)	X	X
Pepsi-Cola Bottling Company	REC (LUST)	X	X
River Street Property	REC (VCP)	X	X
Pueblo MOP Yard (Also known as Former Missouri Pacific yard)	REC (VCP)		X
Rampart Supply	REC (VCP)	X	X
RMSM Slag piles	REC	X	X
Greenhorn Drive	AOPC	X	X
Cliff Brice Petroleum Warehouse/Bulk Plant	AOPC (USTs and ASTs)	X	X

AOPC = area of potential concern  
 CERCLA = Comprehensive Environmental Response, Compensation and Liability Act  
 NFRAP = No Further Remedial Action Planned  
 REC = recognized environmental condition  
 SQG = small quantity generator  
 VCP = Voluntary Cleanup Program

AST = aboveground storage tank  
 COR ACT = corrective action  
 LUST = leaking underground storage tank  
 RCRA = Resource Conservation and Recovery Act  
 RMSM = Evraz Rocky Mountain Steel Mill  
 UST = underground storage tank

**South Area (Phase 2)**

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

**Central Area (Phase 2)****Existing I-25 Alternative**

The Existing I-25 Alternative would impact three RECs in the Central Area (Phase 2) of the project corridor. The RECs include the Colorado Smelter and Santa Fe (Bridge) Culvert Sites, the Evraz Rocky Mountain Steel Mills property, and the Rockwool Industries sites.

**Modified I-25 Alternative (Preferred Alternative)**

The Modified I-25 Alternative (Preferred Alternative) would impact four RECs and one area of potential environmental concern in the Central Area (Phase 2) of the project corridor. The RECs include the Pueblo MOP Yard, the

Evraz Rocky Mountain Steel Mills property and slag piles, and the Pepsi-Cola Bottling Company. The area of potential environmental concern is the VAE North America Rail facility. Asbestos is suspected in soils at the Evraz Rocky Mountain Steel Mills property.

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.

**3.11.3 Mitigation**

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

- ❖ A site-specific Phase I Environmental Site Assessment 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 ISA may be performed on sites identified as RECs or areas of potential environmental concern. Contaminated material will be dealt with in accordance with environmental regulations. 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.
- ❖ If dewatering is necessary, groundwater will be managed in accordance with appropriate CDOT specifications and permitted by the CDPHE Water Quality Control Division.
- ❖ Groundwater monitoring wells at the Pepsi-Cola Bottling Company site that are abandoned will be 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 any regulated materials. CDOT will meet all state and federal regulations pertaining to demolition of buildings and other structures. Regulated materials must be removed from any structures prior to demolition and appropriately recycled or disposed.
- ❖ CDOT 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.