



Summary of Burnham Yard Environmental Site Investigations

Overview:

This document is intended to provide an overview of what is currently known about the residual environmental conditions from the historical railyard operations at the Burnham Yard property (“Property”) that may need to be addressed in connection with Property redevelopment. To protect workers, the Property’s neighbors, and the broader public, additional investigation activities are anticipated, and any required cleanup activities will be approved by the Colorado Department of Public Health and Environment or other regulatory agencies as applicable.

A number of environmental investigations have been commissioned over time to assess the impacts associated with historical railyard operations at the Property from approximately 1871 to 2016. The State of Colorado did its own due diligence in 2020 prior to purchasing the property from the Union Pacific Railroad, including soil sampling, monitoring well installation and groundwater sampling, a high resolution site characterization (“HRSC”) of soil and groundwater conditions at depth, and a ground penetrating radar (“GPR”) survey to identify subsurface infrastructure and utility locations. Additional soil and groundwater investigations, and an additional HRSC investigation, were completed in 2024 to better define Property conditions and potential management and cleanup needs. The State’s investigations included the collection and analysis of hundreds of surface and subsurface soil samples and dozens of groundwater samples. Overall, the investigations to date have identified weathered and residual impacts to soil and groundwater at various locations that are typical for a historical railyard property. The results of the soil, groundwater, and other Property investigations are summarized below.

The State also surveyed 21 buildings and associated sheds and structures that were present on the Property when the State acquired it for the presence of asbestos, which was commonly used at the time, i.e., for surfacing, thermal system insulation, miscellaneous materials, and other industrial uses. Regulated asbestos containing materials were identified in over 50% of the buildings surveyed. Twenty of these buildings and associated sheds and structures were demolished in anticipation of Property redevelopment. This demolition work was performed in compliance with detailed state requirements concerning asbestos abatement.

Soil Investigation Results:

VOCs, TPH, and other Organic Compounds

Soil sampling at the Property identified diesel range and oil range organics (collectively, total petroleum hydrocarbons or “TPH”) at the Property above regulatory screening levels that are consistent with historical fuel release(s) at the Property. Low levels of volatile organic compounds (“VOC”) and semi-volatile organic compounds (“SVOC”) were also detected at various locations on the Property and also appear to be largely associated with historical fuel release(s) at the Property. Polycyclic aromatic hydrocarbons (“PAHs”) were detected in a few soil samples at concentrations slightly above their



regulatory screening levels, although the PAH impacts do not appear to be significant. Finally, chlorinated solvents and polychlorinated biphenyls (“PCBs”) were not detected in soil samples above their respective regulatory screening levels, although some chlorinated solvents were detected in soil gas and are discussed in more detail below.

In summary, the organics detected in soil are generally consistent with historical releases that have weathered over time and generally are present at low concentrations. These impacts, as well as the other soil impacts identified below, can be readily managed as needed with standard environmental management practices and engineering controls.

Metals

Lead was detected above the U.S. Environmental Protection Agency’s most conservative Residential Soil Lead (“RSL”) Guideline value of 100 mg/kg in approximately 50% of the 78 soil samples analyzed for lead, with most of the exceedances detected in apparent fill materials. Arsenic and cadmium RSL exceedances generally were co-located with lead impacts. The co-located metals impacts are typical of historical fill material that has been identified at many locations in the Platte Valley. Additional sampling to better define soils with elevated metals concentrations is anticipated as part of the Property purchaser’s due diligence and planning for Property redevelopment.

Asbestos

A total of 101 debris samples and 76 soil samples were collected and analyzed for asbestos. Of the 177 total samples, only 29 samples detected greater than 1% of potentially regulated asbestos, all of which were debris samples, and 25 samples detected trace amounts of asbestos. Additional sampling to better define the areas where regulated asbestos is present in soils and debris on the Property is anticipated as part of the Property purchaser’s due diligence and planning for Property redevelopment.

Groundwater Investigation Results:

Groundwater samples were collected from 28 temporary groundwater monitoring wells installed as part of the State’s due diligence in 2020 and from additional monitoring wells installed as part of the State’s 2024 investigations. Both the 2020 and 2024 HRSCs, as well as the analytical data, identified a plume of light non-aqueous phase liquid (“LNAPL”) present in groundwater at the Property at concentrations above regulatory screening levels. These constituents have weathered over many decades and the plume itself appears to be stable and not acting as a continuous source of dissolved phase loading to groundwater. Cadmium, lead, PCBs and certain chlorinated solvents were also detected in certain groundwater monitoring wells above screening levels. However, the water at the Property is not used for domestic or other purposes so there is no risk of public exposure or consumption. Groundwater at the Property will need to be managed appropriately and may need to be treated prior to discharge if groundwater dewatering is required in connection with the Property redevelopment plans.



Soil Gas & Other Considerations:

Soil Gas

Soil gas testing identified vapors from residual benzene, trichloroethylene, perchloroethylene, and other VOCs exceeding their respective EPA risk-based screening levels in soil at multiple locations on the Property. These vapors can migrate upward and are primarily relevant for potential air quality concerns in enclosed, regularly occupied structures. Some of the impacted soil are likely to be excavated and managed off-site as part of site redevelopment and any remaining impacted soils are manageable with standard engineering controls that can be addressed during redevelopment planning and construction.

Per- and Polyfluoroalkyl Substances (“PFAS”)

Certain PFAS chemicals were detected above regulatory screening levels in one shallow soil sample and in one groundwater sample. Additional sampling to better define the extent of any PFAS impacts is anticipated as part of Property purchaser’s due diligence and planning for Property redevelopment.

Radiation Screening

Radiation testing across the Property showed levels consistent with background conditions. No radiological concerns were identified at the Property.

Tanks, Transformers, and Remaining Structures

Regulatory records indicate that there were 25 registered above ground storage tanks and three underground storage tanks (“UST”) at the Property that have since been closed and removed. While not definitive, the 2020 HRSC and GPR investigations did not identify any USTs still present at the Property, which is consistent with the available regulatory records. Due diligence conducted by the State in 2020 also identified areas where PCBs could be present in the soil due to leakage from old pole-mounted electrical transformers still present on the Property. Finally, several underground concrete structures that supported railyard operations remain at the Property. These structures will need to be demolished and removed to facilitate future redevelopment.

Future Plans:

Additional environmental investigation and monitoring, cleanup, and redevelopment work will comply with all regulatory requirements and protocols based on detailed planning and coordination with the pertinent regulatory authorities. This will ensure that there are no unacceptable environmental impacts to the health of workers, Property neighbors, and the general public related to historical Property conditions during and after project construction.