

Appendix C6.

Hazardous Materials





C6. HAZARDOUS MATERIALS TECHNICAL MEMORANDUM

June 2023

Project Number: NHPP 006A-06

Subaccount Number: 22922

Introduction

The Vasquez Boulevard I-270 to 64th Avenue project is located within the City of Commerce City, Adams County, Colorado. The purpose and goal of the project is to improve traffic operations and safety along this section of Vasquez Boulevard including improvements to the 60th Avenue, 62nd Avenue and 64th Avenue intersections.

The following project information can be found in **Attachment A** Project Information:

- Introduction and Background
- Project study area
- Purpose and Need
- Proposed Action Description

This memorandum evaluates the effects of the Vasquez Boulevard I-270 to 64th Avenue Project (Proposed Action) and the No Action with respect to hazardous materials and the potential for encountering contamination during construction, to determine whether materials management or worker health and safety may be impacted and to assess liability as part of acquisition.

Federal/Local Regulations & Policies

This memorandum has been prepared to evaluate potential impacts to hazardous materials by the Proposed Action and No Action in accordance with the following federal, state and local regulations and policies. Hazardous waste sites are regulated by the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Existing Conditions

The study area consists of road ROWs for Vasquez Boulevard from 60th Avenue to 64th Avenue, Parkway Drive and Clermont Street. In addition, portions of the Project are located on private parcels west of Vasquez Boulevard.



Methodology

A Modified Environmental Site Assessment (MESA) was prepared using methodology based on CDOT hazardous materials guidance (CDOT EPB, 2018) as modified from the American Society for Testing and Materials (ASTM) Designation E 1527-13 and E 1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process” (ASTM, 2013; ASTM, 2021) and U.S. Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (40 [Code of Federal Regulations] CFR Part 312).

The methodology used to identify sites with recognized environmental conditions (RECs) or potential environmental conditions (PECs) in the study area included the following steps:

Contracting Environmental Risk Information Services (ERIS) (2022) to conduct a regulatory database search of readily available local, state, tribal and federal environmental agency databases for sites with potential or recognized environmental conditions up to one mile from the study area, as dictated by ASTM Standard E1527-13/1527-21. The specific search distances used were equal to or greater than the ASTM E1527-13/1527-21. These ERIS records are included in [Attachment B](#).

Screening of sites identified in the regulatory databases based on distance from the proposed ROW, known environmental site conditions, and, in certain cases, groundwater flow direction ([Table 1](#)).

Sites identified in the regulatory databases were classified into risk categories (low, medium, or high) in terms of risk to the study area.

Detail agency file reviews were conducted for sites adjoining the study area and sites not adjoining the study area ally and were determined to be medium to high risk.

Reviewing previous CDOT, Colorado Department of Public Health and Environment (CDPHE), and Colorado Department of Labor and Employment Division of Oil and Public Safety (CDLE/OPS) records; and other available records from local, state and federal agencies regarding properties with recognized environmental conditions in the study area.

Reviewing readily available standard historical sources, including aerial photographs, and United States Geological Survey (USGS) topographic maps to identify historical land uses in the study area.

Identifying properties in the study area requiring additional evaluation or investigation to assist in project design-specific materials management/institutional controls that may be required during construction, or the ROW acquisition process, if full acquisition is necessary.

Performing a limited site reconnaissance (“windshield survey”) of properties in the study area from public ROWs to identify current site activities and potential contamination sources adjacent to the study area.



Terminology

This section provides a brief explanation of some of the common terminology used in this Hazardous Materials Technical Memorandum.

- **Hazardous Materials** - The term hazardous materials is an all-inclusive term for materials that are regulated as solid waste, hazardous waste and other wastes contaminated with hazardous substances, radioactive materials, petroleum fuels, toxic substances and pollutants.
- **Sites with Recognized Environmental Conditions (REC)** - For this MESA report, sites in the study area were identified as having recognized environmental conditions as defined by ASTM, “(1) the presence of hazardous substances or petroleum products, in, on, or at the subject property due to a release; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment” (ASTM E1527-21).
- **Sites with Potential Environmental Conditions (PEC)** - Sites identified in the study area as having potential environmental conditions (i.e., evidence of storage, handling, or disposal of hazardous materials) during site reconnaissance and historical review activities that could not be confirmed without additional inspection or investigation are distinguished in this report as sites with potential environmental conditions.
- **Controlled Recognized Environmental Condition (CREC)** - Sites identified in the study area as having had a REC that “has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous materials or petroleum products allowed to remain in place subject to implementation of required controls” (ASTM E1527-21).
- **Historical Recognized Environmental Condition (HREC)** - Sites identified in the study area that have records of a “previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls” (ASTM E1527-21).
- **De Minimis Condition** - Sites identified in the study area that have been identified as having a release that “generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action” (ASTM E1527-21).
- Sites identified in the regulatory databases were classified into risk categories (low, medium, or high) in terms of risk to the study area:



- **Low Potential Site** - Through investigation, it is determined that it is unlikely that contamination would be encountered during construction.
- **Medium Potential Site** - Through initial investigation, it is unclear whether contamination is located in the project footprint. Subsequently, a subsurface investigation or further coordination with regulatory agencies determines it is unlikely that contamination would be in the project footprint. However, there is greater uncertainty than for a low potential site. On a case-by-case basis, a commitment to the contractor and CDOT Project Manager to look for signs of contamination in specific areas can be included in the hazardous materials assessment and subsequently a Materials Management Plan (MMP) (when required) rather than proceeding with a subsurface investigation.
- **High Potential Site** - Through file review or subsurface investigation, it is determined that it is likely that contamination would be encountered during construction.

Summary

A summary of identified findings and ERO Resources Corporation’s (ERO) determination if the findings constitute RECs associated with the study area is presented in **Table 1**:

Table 1: Findings and Opinion Summary

FINDING	RISK POTENTIAL CLASSIFICATION (LOW, MEDIUM, HIGH)	REC, CREC, HREC, OR PEC?	RATIONALE
2 (National Priority List) NPL sites	Low	PEC	Numerous sites with the potential to have adversely impacted soil and groundwater occur in the study area. Regional groundwater contamination without a specific identified source has been identified in
1 Delisted NPL site (Sand Creek Industrial site)	Medium		
1 Superfund Enterprise Management System (SEMS) site	Low		
18 Superfund Enterprise Management System Archive Site Inventory (SEMS-Archive) sites	Low		
14 Resource Conservation and Recovery Act—Corrective Action Facilities (RCRA CORRACTS) sites	Low		
4 RCRA TSD sites	Low		
12 RCRA Generator sites	Low		



FINDING	RISK POTENTIAL CLASSIFICATION (LOW, MEDIUM, HIGH)	REC, CREC, HREC, OR PEC?	RATIONALE
The Mile High Greyhound Park (6200 Dahlia Street) Institutional controls	Medium		the vicinity of the study area. The Former Commerce City Dog Track/Mile High Greyhound Park/Greyhound Park/Greyhound Flats, at 6200 Dahlia Street, is listed as a solid waste disposal site, has institutional controls and a VCP site in and adjoining the study area.
Former Commerce City Dog Track (6200 Dahlia Street) solid waste disposal site	Medium		
46 remaining landfill and solid waste disposal sites	Low		
Harris Transportation LUST site (5901 Dexter Street)	Medium		
55 remaining Leaking Underground Storage Tank (LUST) / Leaking Aboveground Storage Tank (LAST) sites	Low		
Harris Transportation registered storage tank site (5901 Dexter Street)	Medium		
17 remaining registered storage tank sites	Low		
1 State institutional control/engineering control registries site (The Mile High Greyhound Park) (6200 Dahlia Street)	Medium		
Greyhound Flats Voluntary Cleanup Program (VCP) site (6200 Dahlia Street)	Medium		
10 remaining VCP sites	Low		



FINDING	RISK POTENTIAL CLASSIFICATION (LOW, MEDIUM, HIGH)	REC, CREC, HREC, OR PEC?	RATIONALE
Electrical transformers in the study area	NA	PEC	While no indications of leakage were observed on or around any of the transformers, should any electrical transformers be disturbed, there is the potential to encounter transformer oils containing polychlorinated biphenyls (PCBs).
Painted metal structures in the study area	NA	PEC	The painted metal structures are potentially painted with lead-based paint (LBP) and, therefore, will require special handling if planned for removal and disposal.
Buried utilities potentially containing asbestos	NA	PEC	It is unknown if buried utilities containing asbestos are present in the subsurface of the study area.

Conclusions

This MESA was performed in conformance with the scope and limitations of the CDOT requirements detailed in CDOT’s *Hazardous Material Guidance*, dated June 2018 (CDOT 2018) of the Vasquez Boulevard, 58th Avenue to 64th Avenue Project in the City of Commerce City, Colorado. Any modifications or limitations from this practice are described in the Methodology section of this report.



This assessment has identified numerous sites in and adjoining the study area as PECs

- Sand Creek Industrial Site, the Mile High Greyhound Park/Former Commerce City Dog Track site/Mile High Greyhound Park/Greyhound Flats VCP site, and the Harris Transportation are the sites identified as medium environmental risk sites associated with the study area.
- The following PECs associated with the study area were identified during the site reconnaissance:
 - Inability to access two private parcels in the study area;
 - Electrical transformers potentially containing PCBs in and adjoining the study area;
 - The painted metal poles and other structures potentially painted with LBP, which will require special handling if planned for removal and disposal; and
 - Buried utilities containing asbestos potentially located in the study area.

The following is recommended:

Conducting follow-up Phase I ESAs for private parcels of land where new roads will be constructed and ROW will be acquired by CDOT;

Conducting additional subsurface investigations for areas of the study area where soil excavation will occur with the potential for worker exposure to contaminated soil and/or groundwater and additional waste handling requirements associated with contaminated materials;

Preparing a materials management plan for the project to identify how the contractor will manage hazardous materials during construction;

Ensuring that if painted metal items identified in the study area are slated for removal and disposal, the contractor shall test for LBP and, if present, removing, disposing, or recycling of the painted components shall be done in compliance with CDOT

Specification 250 - Environmental Health & Safety Management (including, but not limited to, Section 250.04) and all applicable Occupational Safety and Health Administration (OSHA), local, state and federal regulations;

Contractors and workers shall comply with the Colorado Department of Transportation's (CDOT) latest Revision of Section 250 – Environmental, Health and Safety Management of the Standard Specifications for Road and Bridge Construction;

Workers shall be alert during excavations for any visual or olfactory signs of contamination. If gas, soil and/or groundwater contamination is encountered, work will stop immediately, and the procedures outlined in the CDOT Specification 250 and subsection 107.25.(b) shall be followed;

Structural excavation, such as caisson and retaining wall construction, may require the dewatering of contaminated groundwater. If dewatering is necessary, groundwater



brought to the surface will be managed according to Section 107.25 of the CDOT Standard Specifications for Road and Bridge Construction and permitted by the CDPHE Water Quality Control Division, in accordance with Section 402 of the Clean Water Act; and

If any drinking water and groundwater monitoring wells are located within the proposed construction area, the wells will be abandoned and plugged according to CDOT Section 202.02 in Standard Specifications for Road and Bridge Construction and in conformance with the Colorado Department of Natural Resources Division of Water Resources State Engineer Water Well Construction Rules, specifically Rule 16, “Standards for Plugging, Sealing, and Abandoning Wells and Boreholes”.

Affected Environment and Existing Conditions

The Project is located within the City of Commerce City, approximately 2.5 miles northeast of the City of Denver, which is part of the Denver Metropolitan Area (DMA). Land uses in the study area are primarily commercial and industrial types with some residential neighborhoods located east of Parkway Drive, between 62nd Avenue and 60th Avenue. Both the Union Pacific and Burlington Northern Railroads run just north of the study area.

Vasquez Boulevard is a divided principal arterial roadway that primarily has three-lane travel lanes in each travel direction (i.e., north/south) with dedicated left and right turn lanes at major intersections. It provides direct access to I-270 via a cloverleaf-style interchange directly south of the study area and has a posted speed limit of 45 miles per hour (mph).

There are two frontage roads that parallel Vasquez Boulevard and provide the primary access to adjoined land uses: Dexter Street and Dahlia Street. Both Dexter Street and Dahlia Street carry a low volume of traffic and provide one travel lane in each direction. Dahlia Street is east of Vasquez Boulevard, approximately 0.25 miles long, ending at 60th Avenue, with a posted speed limit of 35 mph. Dexter Street is west of Vasquez Boulevard, approximately 0.54 miles long, ending at 63rd Avenue, with a posted speed limit of 35 mph.

60th Avenue is a minor arterial/collector with primarily one travel lane in each direction (i.e., east/west) and center left-turn pockets/lanes accessing adjacent developments. It has a posted speed limit of 35 mph and provides the only access to the industrial developments to the west of Vasquez Boulevard.

62nd Avenue is a collector with one lane of travel in each direction (i.e., east/west) with a posted speed limit of 35 mph. It currently ends at northbound Vasquez Boulevard, requiring southbound traffic to travel northbound on Vasquez Boulevard for approximately one quarter of a mile (0.25 miles) before accessing southbound Vasquez Boulevard at 64th Avenue.



GROUNDWATER

A preliminary subsurface investigation was conducted to advance the initial design and location of proposed permanent water quality ponds. Groundwater was encountered from approximately nine to 15 feet below ground surface. Therefore, it is anticipated that groundwater will likely not be encountered for proposed drainage systems and proposed water quality ponds. Groundwater may be encountered during construction of other project elements such as traffic signal caissons. Additionally, a geotechnical investigation along with a hazardous material assessment of the site soils is to be finalized once all the borings for the project are performed. This information will be used to inform permanent water quality and final design.

Impacts

No ACTION

No Action would leave Vasquez Boulevard as it currently is configured and would not provide any improvements beyond typical maintenance activities. The roadway would remain the same, with three southbound lanes and three northbound lanes separated by a raised median. There would be no changes to the intersection of 60th Avenue, Parkway Drive and Vasquez Boulevard. As part of the No Action, proposed roads west of Vasquez Boulevard would not be constructed. As part of Vasquez Boulevard, normal maintenance of the roadway would continue to be performed by CDOT.

The No Action would have no effects on sites with potential or recognized hazardous materials sites due to no physical changes being made by the project. There would be no further changes to the existing conditions with respect to hazardous wastes associated with RECs, CRECs, or PEC in the study area. This potentially poses as a hazard to maintenance and utility workers who are likely unaware of existing hazardous material conditions in the study area.

PROPOSED ACTION

The Proposed Action includes improvements at the Vasquez Boulevard/60th Avenue intersection and Vasquez Boulevard/62nd Avenue intersection, as well as the local street network that are intended to reduce congestion, improve access and improve safety in the study area. When compared to the No Action, the Proposed Action has the potential to impact hazardous materials from sites associated with RECs, CRECs, or PEC in the study area.

Direct Impacts

Direct and temporary impacts to hazardous materials from sites associated with RECs, CRECs, or PEC in the study area and in the surrounding area consist of increased costs to the project due to mitigating the effects of the hazardous materials on worker's health and safety and



materials/waste handling and disposal issues associated with solid waste generated during construction.

Construction Impacts

Construction of the Proposed Action would be the only direct impacts of the project. Therefore, the impacts would be associated with worker’s health and safety and materials/waste handling and disposal issues associated with solid waste generated during construction.

Summary of Impacts

[Table 2](#) below summarizes the direct and construction impacts with implementation of the Proposed Action.

Table 2: Summary of Proposed Action Impacts

RESOURCE	CONTEXT	IMPACTS FROM PROPOSED ACTION
Hazardous Materials	Numerous sites associated with potential environmental conditions are located in and adjoining the study area	<u>Permanent Impacts:</u> No permanent impacts <u>Temporary Impacts:</u> Worker’s health and safety and materials/waste handling and disposal issues associated with solid waste generated during construction.

Mitigation

The following recommendations constitute the mitigations efforts for the project with respect to hazardous materials:

Contractors and workers shall comply with the Colorado Department of Transportation’s (CDOT) latest Revision of Section 250 – Environmental, Health and Safety Management (EHSM) of the Standard Specifications for Road and Bridge Construction;

Prior to construction, CDOT will prepare a Project-specific Materials Management Plan (MMP) that details site-specific standard operating procedures regarding the identification, sampling, handling and disposal of wastes and hazardous materials that could be encountered during construction;



The contractor shall complete a Health and Safety Plan (HASP) to address potential wastes and hazardous materials that could be uncovered during construction. Workers shall be alert during excavations for any visual or olfactory signs of contamination. If gas, soil and/or groundwater contamination is encountered, work will stop immediately, and the procedures outlined in the CDOT Specification 250 and subsection 107.25.(b) shall be followed;

Prior to construction, the contractor shall identify any painted metal items that could be impacted during construction. If painted metal items identified in the study area are slated for removal and disposal, the contractor shall test for LBP and, if present, removing, disposing, or recycling of the painted components shall be done in compliance with CDOT Specification 250 - EHSM (including, but not limited to, Section 250.04) and all applicable Occupational Safety and Health Administration (OSHA), local, state and federal regulations;

Structural excavation, such as caisson and retaining wall construction, may require the dewatering of contaminated groundwater. If dewatering is necessary, groundwater brought to the surface will be managed according to Section 107.25 of the CDOT Standard Specifications for Road and Bridge Construction and permitted by the CDPHE Water Quality Control Division, in accordance with Section 402 of the Clean Water Act; If any drinking water and groundwater monitoring wells are located within the proposed construction area, the wells will be abandoned and plugged according to CDOT Section 202.02 in Standard Specifications for Road and Bridge Construction and in conformance with the Colorado Department of Natural Resources Division of Water Resources State Engineer Water Well Construction Rules, specifically Rule 16, "Standards for Plugging, Sealing, and Abandoning Wells and Boreholes"; and

Consult with CDOT Property Management regarding any structure and property acquisitions and/or impacts.



Figure 1: Vicinity Map

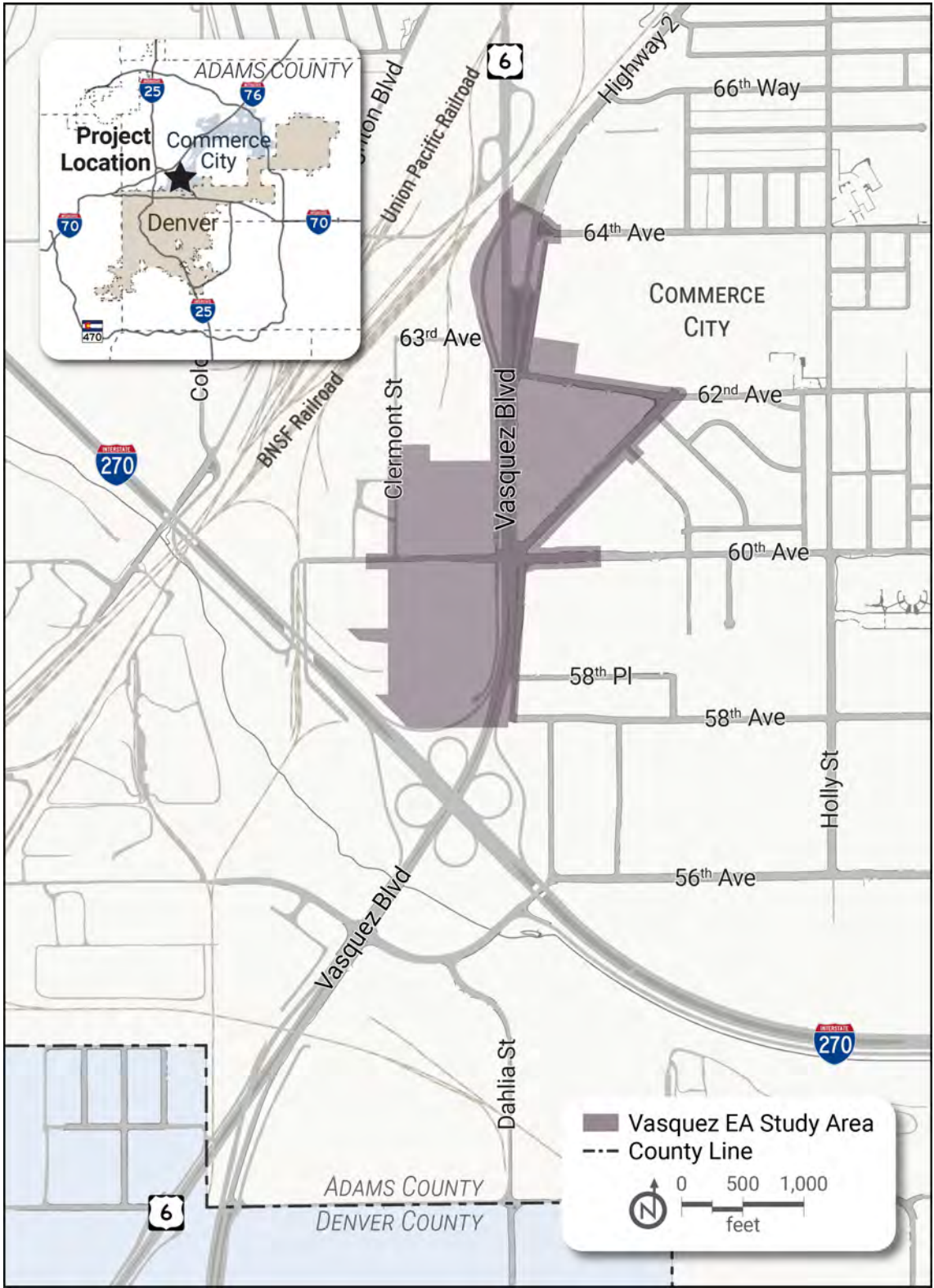
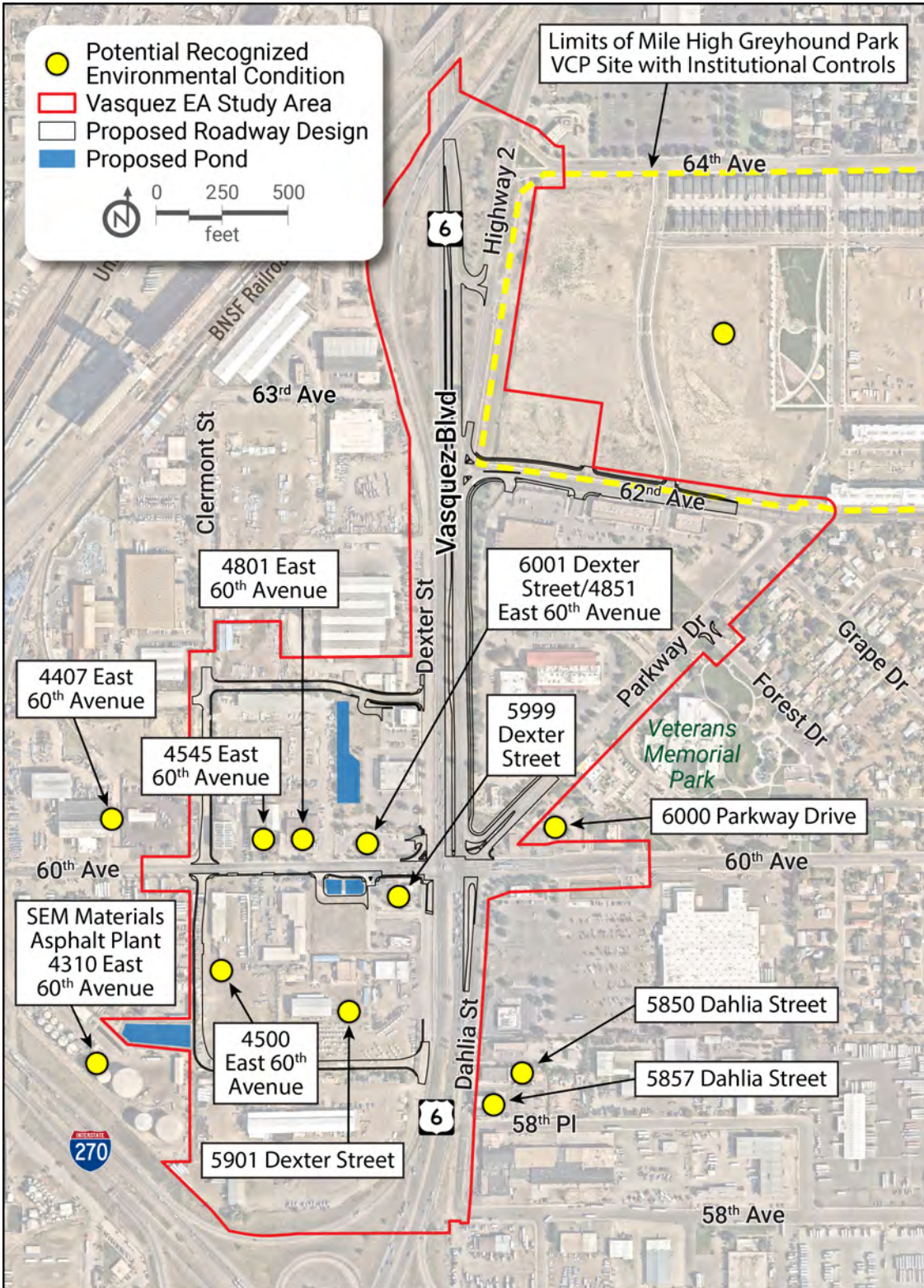




Figure 2: Site Plan





References

ASTM International (ASTM). 2013. Annual Book of ASTM Standards. "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." Philadelphia: ASTM E1527-13.

ASTM International (ASTM). 2021. Annual Book of ASTM Standards. "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." Philadelphia: ASTM E1527-21.

Colorado Department of Transportation (CDOT), Environmental Programs Branch (EPB). 2018. Hazardous Materials Guidance. June.



Acronyms and Abbreviations

ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CDLE OPS	Colorado Department of Labor and Employment Division of Oil and Public Safety
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CREC	Controlled Recognized Environmental Condition
EPA	U.S. Environmental Protection Agency
EPB	Environmental Programs Branch
ERIS	Environmental Risk Information Services
ERO	ERO Resources Corporation
HREC	Historical Recognized Environmental Condition
I-270	Interstate 270
LAST	Leaking Aboveground Storage Tank
LUST	Leaking Underground Storage Tank
MESA	Modified Environmental Site Assessment
NPL	National Priority List
PCBs	Polychlorinated Biphenyls
PEC	Potential Environmental Condition
RCRA	Resource Conservation and Recovery Act
RCRA CORRACTS	Resource Conservation and Recovery Act—Corrective Action Facilities
REC	Recognized Environmental Condition
ROW	Right-of-Way
SEMS	Superfund Enterprise Management System
SEMS Archive	Superfund Enterprise Management System Archive Site Inventory
VCP	Voluntary Cleanup Program

Attachment A.
Project Information



Attachment A:

Project Information

June 2023

Project Number: NHPP 006A-06

Subaccount number: 22922

Introduction and Background

The Vasquez Boulevard (United States Route 6 [US 6]) I-270 to 64th Avenue project (Project) is located within the limits of the City of Commerce City (Commerce City) in Adams County. The Colorado Department of Transportation (CDOT), in cooperation with the Federal Highway Administration (FHWA) and local agencies including Adams County, the City of Commerce City, City and County of Denver, Denver Regional Council of Governments (DRCOG) and the Regional Transportation District (RTD), conducted a Planning and Environmental Linkages (PEL) study in 2018. The Vasquez Boulevard PEL study provided a framework for the implementation of transportation improvements along the corridor between 52nd Avenue and 64th Avenue and along I-270 for a ½-mile north and south of the I-270/Vasquez Boulevard interchange. The Project falls within the limits of the PEL study and is now following the NEPA process to prepare an Environmental Assessment to identify a preferred alternative based on the needs identified in the PEL.

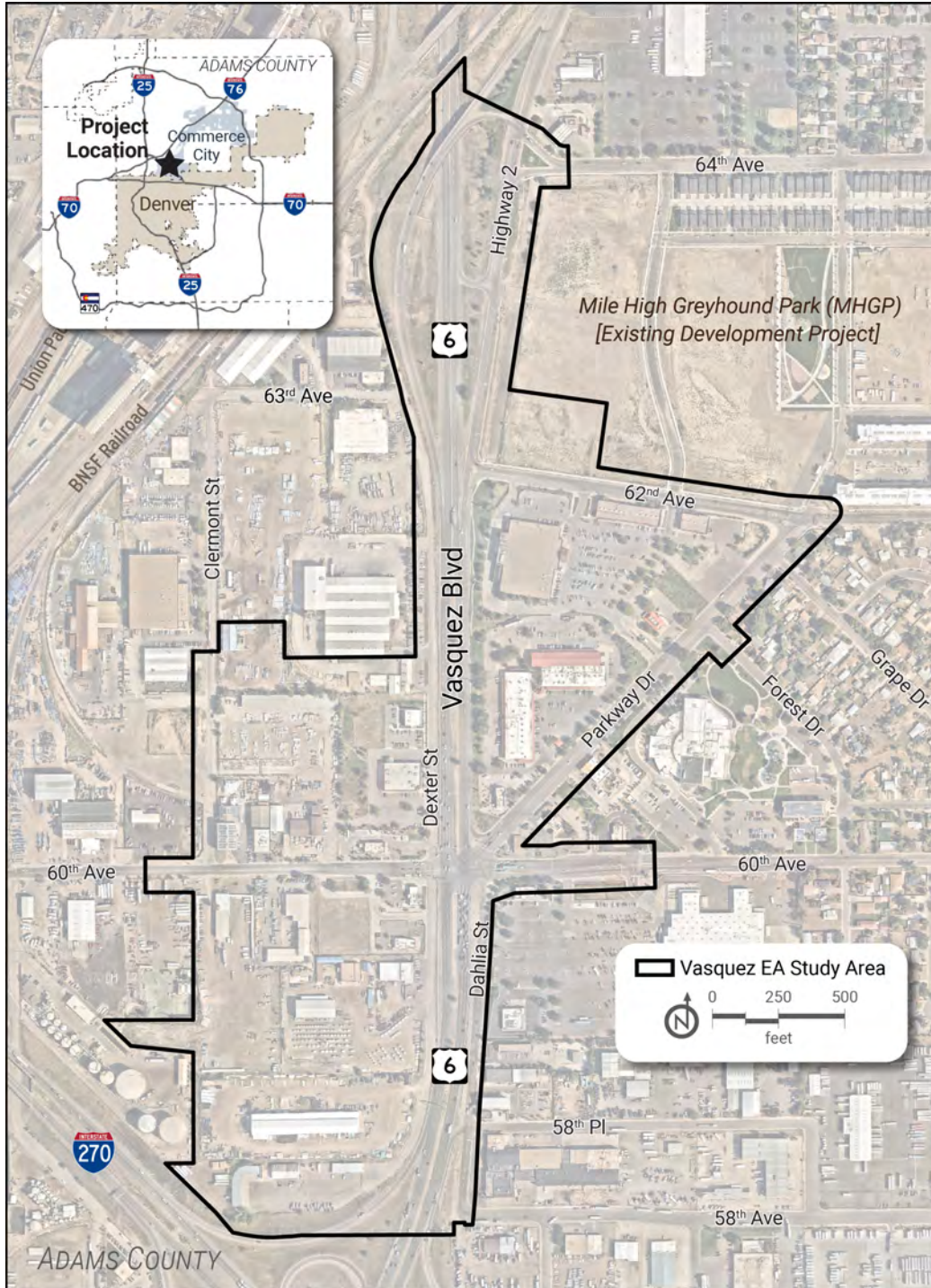
The PEL study identified long-term transportation improvements and evaluated potential projects that could be implemented with available funding as near-term improvements. Potential near-term improvements were identified to improve operations, safety, and connectivity along Vasquez Boulevard, focusing on the Vasquez Boulevard/60th Avenue and Vasquez Boulevard/62nd Avenue intersections. Transportation Improvement Program (TIP) funding, state funding and other sources were obtained for this current Project to construct these near-term improvements along Vasquez Boulevard.

Study Area

The study area extends along Vasquez Boulevard from 58th Avenue (just north of the I-270 interchange) north to the BNSF Railroad bridge. West of Vasquez Boulevard, the study area extends to Clermont Street, between the on-ramp to I-270 and just north of 60th Avenue. East of Vasquez Boulevard, the study area includes Parkway Drive, 60th Avenue and 62nd Avenue. The study area also includes proposed drainage work to an existing water quality pond within the Mile High Greyhound Park (MHGP) property at the corner of 62nd Avenue and Highway 2. Some environmental resources evaluated for the NEPA process may have a slightly different study area depending on specific resource requirements.



Figure 1: Project Study Area





Purpose and Need

The purpose of the Vasquez Boulevard I-270 to 64th Avenue Project is to address the following needs:

- improve operations for vehicles and freight;
- improve safety;
- improve multimodal connections.

Proposed Action

The Proposed Action includes improvements at the Vasquez Boulevard/60th and Vasquez Boulevard/62nd intersections, as well as the local street network and multimodal facilities, as shown in [Figure 2](#).

Vasquez Boulevard/60th Avenue

The Proposed Action includes the elements listed below for the Vasquez Boulevard/60th Avenue intersection:

- Only right turn movements to northbound Vasquez Boulevard from Parkway Drive. No access to other roads.
 - All inbound movements to Parkway Drive remain open as they exist now.
- All inbound movements from Vasquez Boulevard/60th to frontage roads remain as they exist now, but outbound movements are restricted.
 - Right turn only from southeast frontage road and all in movements allowed (all movements remain as they exist)
 - Right turn only from northwest frontage road and all in movements allowed (in movements remain as they exist)
 - No movement out from southwest frontage road and all in movements allowed (in movements remain as they exist)
- Two new local road connections to Clermont Street west of Vasquez Boulevard provide full access between frontage roads and 60th Avenue.
- Driveways on 60th Avenue, Parkway Drive and frontage roads remain as currently structures or have minor changes
- Restriping of existing crosswalks and new pedestrian refuges improve safety and accessibility of pedestrian infrastructure
- Corner curb bulb-outs would be added at the Parkway/Forest intersection as a deterrent to drivers who may think Forest Drive is an alternate route to 60th Avenue. The bulb-outs and crosswalk will provide visual indication of Forest Drive as a neighborhood street.



Vasquez Boulevard/62nd Avenue

The Proposed Action includes the elements listed below for the Vasquez Boulevard/62nd intersection:

- New traffic signal required at 62nd Avenue with the Vasquez Boulevard/60th Avenue intersection improvements to provide movements restricted from Parkway Drive to Vasquez Boulevard.
- Traffic signal provides full access to/from 62nd Avenue and Vasquez Boulevard/Highway 2.
- Southbound Highway 2 off ramp remains in existing configuration.
- Southbound traffic on Vasquez Boulevard and the Highway 2 off ramp have continuous green time without stopping at the signal for 62nd Avenue traffic.

Vasquez Boulevard Improvements

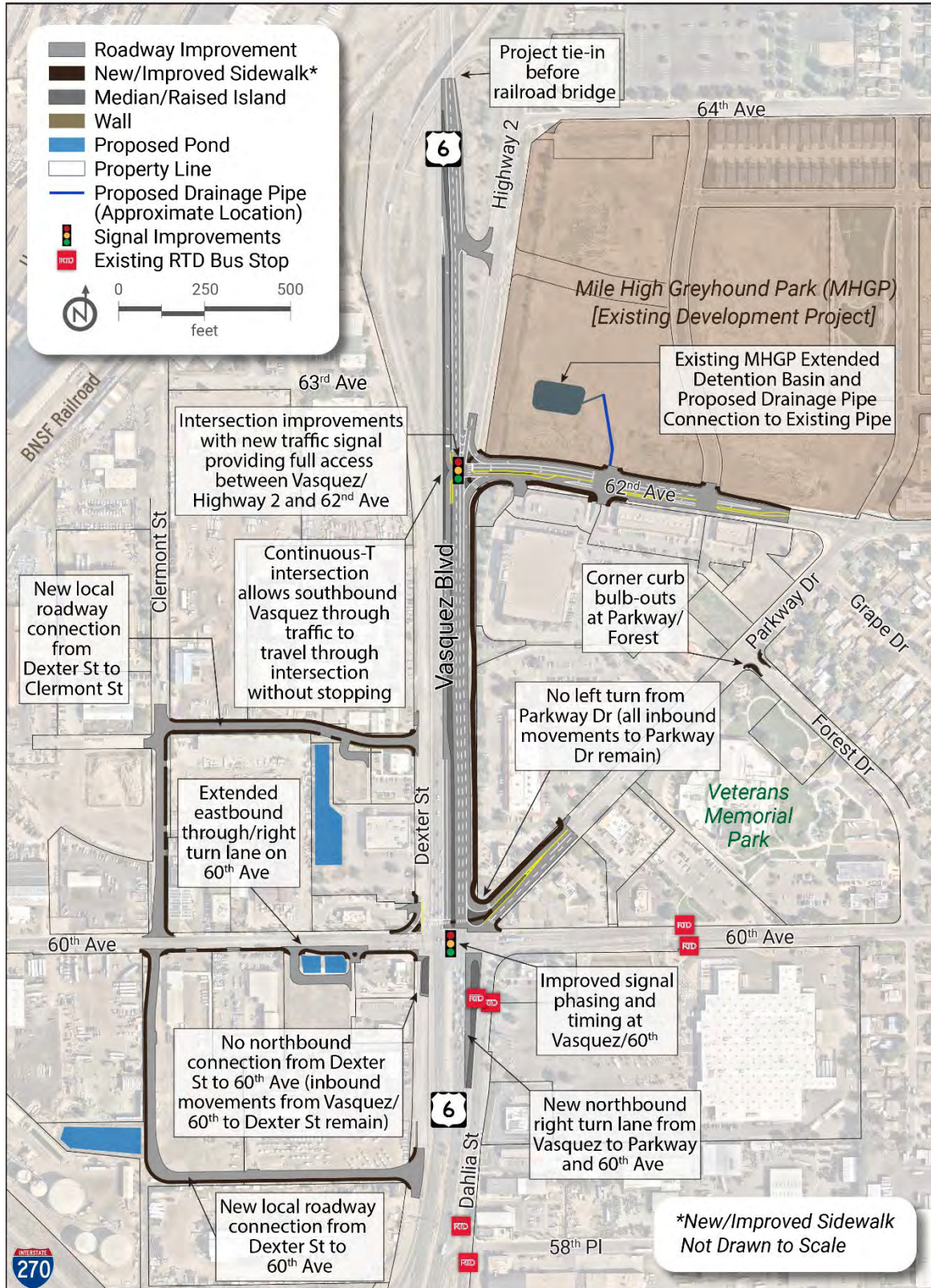
In addition to the improvements at the Vasquez Boulevard/60th Avenue and 62nd Avenue intersections, a portion of Vasquez Boulevard will be reconstructed. The southbound lanes of Vasquez Boulevard will remain as they currently exist (12-foot travel lanes; roadway width varies from 24-feet to 60-feet). Northbound Vasquez Boulevard will be widened a maximum of two feet between 60th Avenue and 62nd Avenue and a maximum of 20 feet north of 62nd Avenue, and the existing median will be modified to add left turn lanes into and out of the new 62nd Avenue intersection. A 10-foot detached multi-use path will be constructed along the eastern side of Vasquez Boulevard, between 60th Avenue and 62nd Avenue.

Local Road Connections

New local roadway connections west of Vasquez Boulevard are part of the Project to enhance the local circulation and pedestrian and bicyclist connectivity of the local street network. The new roadways are two-lane, two-way local roads with the potential for direct property driveway access as approved by Commerce City.



Figure 2: Proposed Action



Attachment B.

Modified Environmental Site Assessment



Consultants in Natural Resources and the Environment

Modified Environmental Site Assessment Vasquez Boulevard, I-270 to 64th Avenue Improvements Project Commerce City, Colorado

Prepared for—

David Evans & Associates, Inc.
1600 Broadway, Suite 800
Denver, Colorado 80202

On behalf of—

Colorado Department of Transportation
2829 West Howard Place
Denver, Colorado 80204

Prepared by—

ERO Resources Corporation
1842 Clarkson Street
Denver, Colorado 80218
(303) 830-1188
ERO Project #22-038

November 1, 2022

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Acronyms and Abbreviations

ACM	Asbestos Containing Materials
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
CDH	Colorado Department of Health
CDLE/OIS	Colorado Department of Labor and Employment, Oil Inspection Section
CDLE OPS	Colorado Department of Labor and Employment Division of Oil and Public Safety
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CDWR	Colorado Department of Water Resources
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CFR	Code of Federal Regulations
COGCC	Colorado Oil and Gas Conservation Commission
CREC	Controlled Recognized Environmental Condition
DEA	David Evans & Associates, Inc.
EPA	U.S. Environmental Protection Agency
EPB	Environmental Programs Branch
ERIS	Environmental Risk Information Services
ERNS	Emergency Response Notification System
ERO	ERO Resources Corporation
HREC	Historical Recognized Environmental Condition
I-270	Interstate 270
I-76	Interstate 76
LAST	Leaking Aboveground Storage Tank
LUST	Leaking Underground Storage Tank
MESA	Modified Environmental Site Assessment
NEPA	National Environmental Policy Act
NFA	No Further Action
NPL	National Priority List
PCBs	Polychlorinated Biphenyls
PEC	Potential Environmental Condition
RBSL	Risk Based Screening Levels
RCRA	Resource Conservation and Recovery Act
RCRA CORRACTS	Resource Conservation and Recovery Act—Corrective Action Facilities
RCRA LQG	Resource Conservation and Recovery Act—Large Quantity Generator
RCRA SQG	Resource Conservation and Recovery Act – Small Quantity Generator
RCRA VSQG	Resource Conservation and Recovery Act – Very Small Quantity Generator
RCRA NON-GEN	Resource Conservation and Recovery Act—Non-Generator
REC	Recognized Environmental Condition
Recycling	Registered Recycling Facilities
ROW	Right-of-Way
SEMS	Superfund Enterprise Management System
SEMS ARCHIVE	Superfund Enterprise Management System Archive Site Inventory
SWF/LF	Solid Waste Facilities/ Landfills
µg/L	Micrograms per Liter
USGS	United States Geological Survey
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program

Modified Environmental Site Assessment

Vasquez Boulevard, I-270 to 64th Avenue Transportation Improvements Project Commerce City, Colorado

November 1, 2022

1.0 Introduction

David Evans & Associates, Inc. (DEA), on behalf of the Colorado Department of Transportation (CDOT), retained ERO Resources Corporation (ERO) to conduct a Modified Environmental Site Assessment (MESA) for the Vasquez Boulevard, Interstate 270 (I-270) to 64th Avenue Transportation Improvements Project in Commerce City, Colorado (Project Area). The Project Area consists of road rights-of-way (ROWs) for Vasquez Boulevard from East 60th Avenue to East 64th Avenue, and portions of Parkway Drive, East 60th Avenue, East 62nd Avenue, and Clermont Street. In addition, portions of the Project Area are located on private parcels west of Vasquez Boulevard and a parcel currently being used for stormwater detention and water quality is at East 69th Avenue. The Project Area and surrounding areas are shown on Figure 1. This report presents the findings, opinions, and conclusions of this MESA.

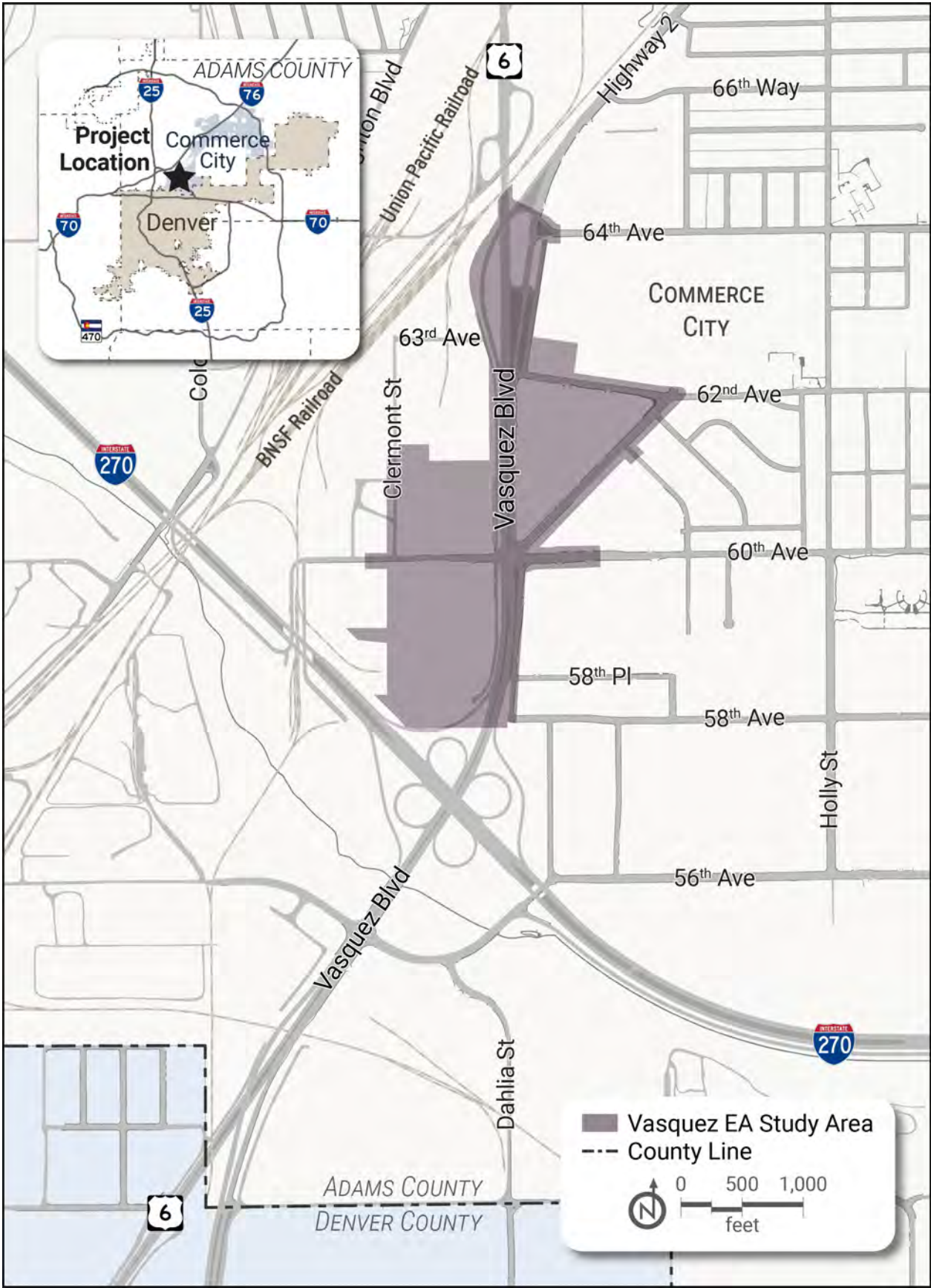
This MESA was performed to satisfy the Work Scope and contract between DEA and ERO dated February 3, 2022 (Appendix D). The conclusions in this report are based on limited observations and investigations described herein at the time this MESA was conducted; future events may alter these findings.

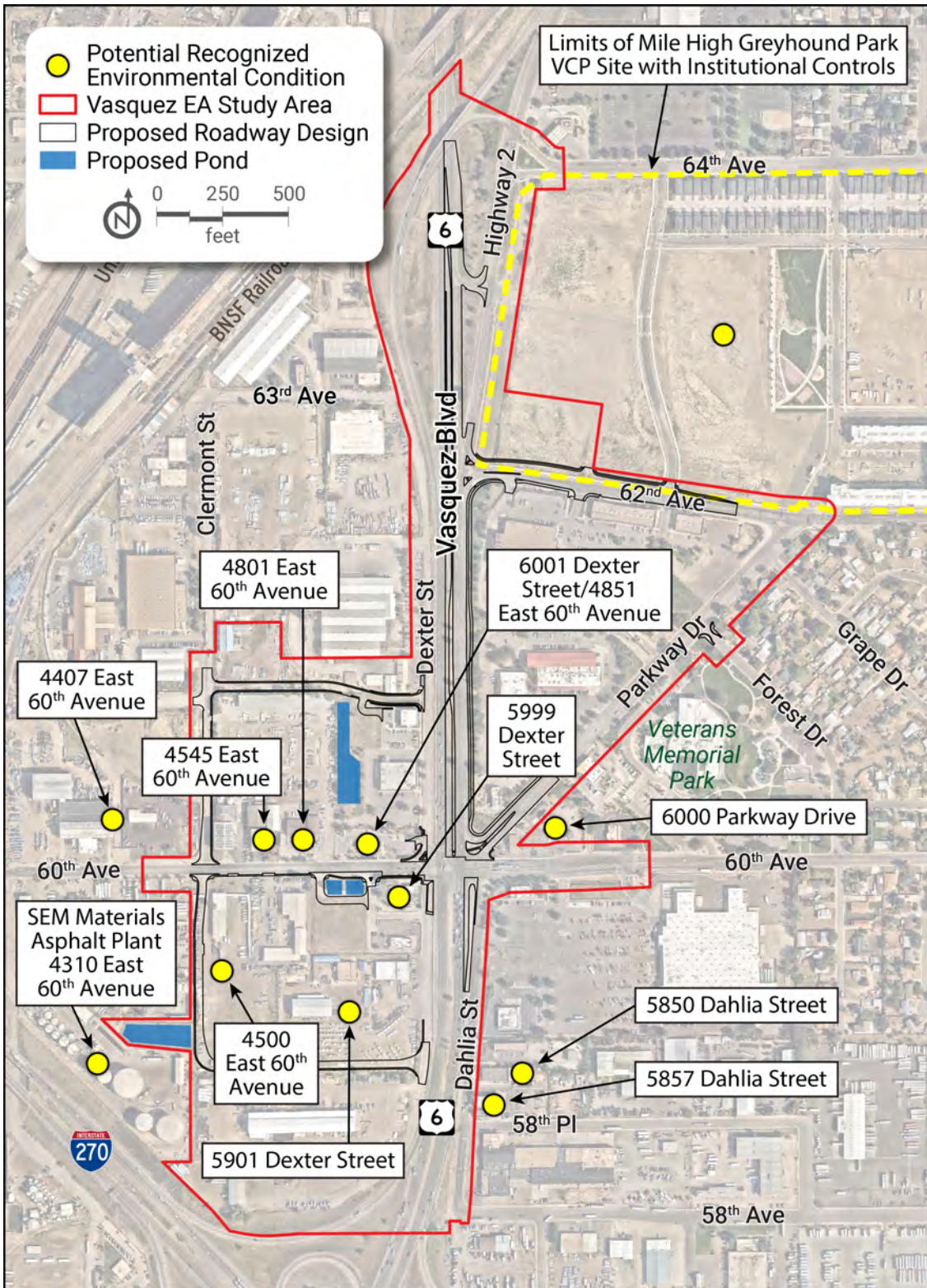
1.1 Location and Legal Description

The Project Area is in Sections 6 and 7, Township 3 South, Range 67 West of the 6th Principal Meridian in Adams County, Colorado. The Project Area location and extent subject to this MESA are shown on Figure 1 and Figure 2. According to the Adams County Assessor's Office, the Project Area consists of publicly owned ROWs along Vasquez Boulevard, Parkway Drive, East 60th Avenue, East 62nd Avenue, Clermont Street, and Parkway Drive (Adams County Assessor's Office 2022).

1.2 Site and Vicinity General Characteristics

The Project Area consists of ROWs for Vasquez Boulevard from East 60th Avenue to East 64th Avenue, and portions of Parkway Drive, East 60th Avenue, East 62nd Avenue, and Clermont Street. In addition, portions of the Project Area are located on private parcels west of Vasquez Boulevard and undeveloped ROW southeast of Vasquez Boulevard and East 69th Avenue. The Project Area is generally bounded by commercial and industrial land in all directions, Fairfax Park to the northeast, railroad tracks to the northwest, graded land for residential construction to the north of East 62nd Avenue, and I-270 to the south (Figure 2).





1.3 Guidance Modifications and Limitations

This MESA report was prepared for DEA and CDOT, for their sole use. Reliance on this report by any other person(s) or entity(ies) is strictly at their own risk, and ERO makes no warranties to any person(s) or entity(ies) other than to DEA and CDOT who use the information provided in this report. If any other person(s) or entity(ies) wish to rely on this report, ERO will require such parties to agree to their contract terms in writing. DEA performed this work for the sole purpose of assisting in the identification of potential and recognized environmental conditions associated with properties with the Project Area. The Scope of Work commissioned for this MESA does not represent an exhaustive study, but rather a reasonable inquiry consistent with CDOT hazardous materials guidance (CDOT Environmental Programs Branch [EPB] 2018), as modified from the American Society for Testing and Materials (ASTM) Designation E 1527-13 and E 1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process” (ASTM 2013; ASTM 2021) and U.S. Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (40 Code of Federal Regulations [CFR] Part 312).

This MESA has been prepared with a level of detail appropriate for the project documentation and identifies sites with potential and recognized environmental conditions associated with the Project Area. The terms “sites with potential environmental conditions” and “sites with recognized environmental conditions” are defined in Section 1.4.

ERO’s assessment and findings presented herein are based upon observation of current conditions in the Project Area and a review of readily available standard historical sources and environmental agency databases. Modifications to the standard Phase I Environmental Site Assessment process include:

- ERO’s assessment did not include a search for environmental cleanup liens or a vapor encroachment screening;
- Aside from two private parcels (5901 Dexter Street and 4500 East 60th Avenue) where access was granted, ERO’s visual site assessment was limited to areas visible from public ROWs and did not include access to fenced-in areas, interiors of buildings, rear lots (alley side portion of adjacent sites), or areas not visible from public ROWs;
- Private parcels owners in the Project Area were not interviewed; and
- This assessment did not attempt to detect the presence of potential environmental contamination that may exist in areas that could not be visually inspected. Records were reviewed for areas not accessible for visible inspection.

The agency data screening is only as accurate as the Environmental Risk Information Service (ERIS) mapping and records obtained on July 27, 2022. When possible, the actual location of sites was verified during site reconnaissance activities and agency file review. Based on this information, sites were remapped as necessary (Appendix B).

This MESA was nonintrusive. Sampling of soils, groundwater, and/or surface waters was beyond the scope of this MESA. Other environmental liabilities to a property owner, such as identifying the presence of asbestos-containing materials (ACM), radon, or lead-based paint, were also beyond the

scope of this investigation. The presence or absence of such conditions cannot be confirmed without additional investigation.

This MESA report does not guarantee that no contamination exists on sites in the Project Area beyond those described at the time of writing this report. Therefore, conclusions presented herein are not necessarily indicative of future conditions or operating practices surrounding the Project Area. No warranties, expressed or implied, are made. All conclusions and recommendations represent the professional opinions of the ERO personnel involved with the MESA, and the results should not be considered a legal interpretation of existing environmental conditions.

1.4 Terminology

This section provides a brief explanation of some of the common terminology used in this MESA report.

- **Hazardous Materials** – The term hazardous materials is an all-inclusive term for materials that are regulated as solid waste, hazardous waste, and other wastes contaminated with hazardous substances, radioactive materials, petroleum fuels, toxic substances, and pollutants.
- **Sites with Recognized Environmental Conditions (REC)** – For this MESA report, sites in the Project Area were identified as having recognized environmental conditions as defined by ASTM, “(1) the presence of hazardous substances or petroleum products, in, on, or at the subject property due to a release; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment” (ASTM E1527-21).
- **Sites with Potential Environmental Conditions (PEC)** – Sites identified in the Project Area as having potential environmental conditions (i.e., evidence of storage, handling, or disposal of hazardous materials) during site reconnaissance and historical review activities that could not be confirmed without additional inspection or investigation are distinguished in this report as sites with potential environmental conditions.
- **Controlled Recognized Environmental Condition (CREC)** – Sites identified in the Project Area as having had a REC that “has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous materials or petroleum products allowed to remain in place subject to implementation of required controls” (ASTM E1527-21).
- **Historical Recognized Environmental Condition (HREC)** – Sites identified in the Project Area that have records of a “previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls” (ASTM E1527-21).
- **De Minimis Condition** – Sites identified in the Project Area that have been identified as having a release that “generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action” (ASTM E1527-21).
- Sites identified in the regulatory databases were classified into risk categories (low, medium, or high) in terms of risk to the Project Area:

- **Low Potential Site** – Through investigation, it is determined that it is unlikely that contamination would be encountered during construction.
- **Medium Potential Site** – Through initial investigation, it is unclear whether contamination is located in the project footprint. Subsequently, a subsurface investigation or further coordination with regulatory agencies determines it is unlikely that contamination would be in the project footprint. However, there is greater uncertainty than for a low potential site. On a case-by-case basis, a commitment to the contractor and CDOT Project Manager to look for signs of contamination in specific areas can be included in the hazardous materials assessment and subsequently a Materials Management Plan (MMP) (when required) rather than proceeding with a subsurface investigation.
- **High Potential Site** – Through file review or subsurface investigation, it is determined that it is likely that contamination would be encountered during construction.

1.5 Methodology

This MESA was prepared using methodology based on CDOT hazardous materials guidance (CDOT EPB, 2018) as modified from the ASTM Designation E 1527-13 and E 1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process” (ASTM, 2013; ASTM, 2021) and EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312). Modifications to this guidance are presented in Section 1.3.

The methodology used to identify sites with RECs or PECs in the Project Area included the following steps:

- Contracting ERIS (2022) to conduct a regulatory database search of readily available local, state, tribal, and federal environmental agency databases for sites with potential or recognized environmental conditions up to 1.0 mile from the Project Area, as dictated by ASTM Standard E1527-13/1527-21. The specific search distances used were equal to or greater than the ASTM E1527-13/1527-21 approximate minimum search distances and are listed in Table 1. These ERIS records are included in Appendix B.
- Screening of sites identified in the regulatory databases based on distance from the proposed ROW, known environmental site conditions, and, in certain cases, groundwater flow direction. Table 8.
- Sites identified in the regulatory databases were classified into risk categories defined in Section 1.4 (low, medium, or high) in terms of risk to the Project Area.
- Detail agency file reviews were conducted for sites adjoining the Project Area and sites not adjoining the Project Area but potentially determined to be medium to high risk.
- Reviewing previous CDOT, Colorado Department of Public Health and Environment (CDPHE), and Colorado Department of Labor and Employment Division of Oil and Public Safety (CDLE/OPS) records; and other available records from local, state, and federal agencies regarding properties with recognized environmental conditions in the Project Area.
- Reviewing readily available standard historical sources, including aerial photographs, and United States Geological Survey (USGS) topographic maps to identify historical land uses in the Project Area.

- Identifying properties in the Project Area requiring additional evaluation or investigation to assist in project design-specific materials management/institutional controls that may be required during construction, or the ROW acquisition process, if full acquisition is necessary.
- Performing a limited site reconnaissance (“windshield survey”) of properties in the Project Area from public ROWs to identify current site activities and potential contamination sources adjacent to the Project Area.

2.0 Records Review

2.1 Physical Setting

The elevation of the Project Area ranges from 5,145 to 5,170 feet above sea level (USGS 2022). Surface geology in the area is characterized by Quaternary-age windblown sand and alluvial deposits of sand and gravel underlain by sandstones, claystones, and conglomerates of the Denver Formation (Trimble and Machette 1979). According to the USGS, depth to the uppermost groundwater beneath the Project Area and vicinity is 10 feet to greater than 20 feet below ground surface (bgs) (Hillier and Schneider 1979). According to topographic information from the USGS 7.5-minute quadrangle map, surface water in the Project Area flows to the northwest (USGS 2022). Based on the topography and field observations, the expected flow direction of the uppermost groundwater is to the northwest.

2.2 Current and Future Use of the Project Area

The Project Area is currently developed as road ROWs, commercial and industrial land, and undeveloped ROW. According to DEA, the Project Area is proposed for transportation improvements (DEA 2022).

2.3 Structures, Roads, or Other Improvements in the Project Area

Paved roads, landscaping, sidewalks, painted metal poles and signs, fire hydrants, treated wooden power poles, and various equipment and structures associated with buried utilities are located in the Project Area. Areas within private parcels generally consist of industrial yards used for precast concrete tank storage, equipment and material storage, vehicle parking, and an informal stormwater detention area. The parcel in the northernmost portion of the Project Area at East 69th Avenue is being used for stormwater detention and water quality.

2.4 Project Purpose

According to conceptual plans and correspondence with DEA, the purpose of the project consists of the following (DEA 2022):

- Improve transportation operations and reliability;
- Improve safety for all transportation modes;
- Balance access between the transportation network and adjacent land uses;
- Effectively connect current and future modes and networks, including roads, bicycles, pedestrians, and transit;
- Improve the ability of freight and goods to efficiently travel through and within the area;

- Minimize and mitigate impacts on the built environment consistent with local master plans; and
- Avoid and minimize impacts on the natural environment.

2.5 Historical Use Information for the Project Area and Adjoining Properties

ERO used the following standard historical sources to evaluate current and past uses of the Project Area and adjoining properties:

- Aerial photographs from 1937 to 2021
- Historical topographic maps from 1938 to 2022

Other standard historical sources for the site, such as fire insurance maps, street directories, property tax files, recorded land title records, building department records, or zoning/land use records, were not reasonably ascertainable, were not available, or, based on ERO's professional experience, are unlikely to be sufficiently useful, accurate, or complete and are unlikely to provide significant additional historical information concerning the Project Area.

2.5.1 Historical Aerial Photographs

Historical aerial photographs from 1937 to 2021 showing the Project Area and surrounding area were reviewed and are discussed below (ERIS 2022a; Google Earth 2022).

1937 Aerial Photograph; Scale: 1 inch = 1,000 feet

The 1937 aerial photograph shows the Project Area as Vasquez Boulevard, agricultural land, East 60th Avenue, and East 64th Avenue. Rural residences, agricultural land, railroad tracks, and other roads are visible in the surrounding area. Sand Creek is visible southwest of the Project Area.

1953 Aerial Photograph; Scale: 1 inch = 1,000 feet

Significant changes to the Project Area and surrounding area visible in the 1953 aerial photograph compared with the previous photograph consist of the following:

- Vasquez Boulevard is visible in its current configuration with associated ramps to State Highway 2 to the north;
- The current roads are visible in the Project Area;
- Industrial development is visible in and adjoining the southwest portion of the Project Area;
- A railroad yard with several buildings is visible adjoining the Project Area to the west;
- The Mile High Kennel Club dog racing track is visible adjoining the Project Area to the northeast; and
- Residential development is visible adjoining the north and east portions of the Project Area.

1963 Aerial Photograph; Scale: 1 inch = 1,000 feet

Significant changes to the Project Area and surrounding area visible in the 1963 aerial photograph compared with the previous photograph consist of the following:

- Increased industrial and commercial development and roads are visible in and adjoining the southwest portion of the Project Area;
- Extensive equipment and material storage is visible in the southwest portion of the Project Area;

- The northernmost portion of the Project Area has been excavated for construction of a stormwater detention pond;
- Increased development, both commercial and residential, is visible in the surrounding area;
- The railroad yard west of the Project Area has increased in size with numerous aboveground storage tanks (ASTs); and
- An oil refinery and tank farm are visible across Sand Creek, southwest of the Project Area.

1971 Aerial Photograph; Scale: 1 inch = 1,000 feet

Significant changes to the Project Area and surrounding area visible in the 1971 aerial photograph compared with the previous photograph consist of the following:

- Several ASTs are visible adjoining the Project Area to the southwest;
- Railroad spurs are visible adjoining the southwest portion of the Project Area; and
- I-270 is visible south-southwest of the Project Area.

1978 Aerial Photograph; Scale: 1 inch = 1,000 feet

Significant changes to the Project Area and surrounding area visible in the 1978 aerial photograph compared with the previous photograph consist of the following:

- Increased material and equipment storage is visible in and adjoining the southwest portion of the Project Area.

1984, 1993, 1999, 2004, 2005, 2009, 2011, 2013, 2015, 2017, 2019, and 2021 Aerial Photographs; Scale: 1 inch = 1,000 feet; and Google Earth, Scale Varies

No significant changes to the Project Area are visible in the aerial photographs from 1984 through 2021 compared with the previous photograph. Additional ASTs are visible adjoining the Project Area to the southwest. Increased material and equipment storage is visible in and adjoining the southwest portion of the Project Area. The Mile High Kennel Club is abandoned starting in the 2013 aerial photograph and is removed and undergoing redevelopment starting in 2019.

2.5.2 Historical Topographic Maps

Historical USGS topographic maps from 1938 to 2019 showing the Project Area and surrounding area were reviewed and are discussed below.

1938 and 1940 USGS 7.5-Minute Series, Derby, CO; Scale: 1:24,000

The USGS topographic maps from 1938 and 1940 show the Project Area as Vasquez Boulevard, undeveloped land, East 60th Avenue, and East 64th Avenue. The Sand Creek Railroad Junction is shown northwest of the Project Area. Rural residences are scattered in the surrounding area. Sand Creek is shown southwest of the Project Area.

1947 and 1950 USGS 7.5-Minute Series, Derby, CO; Scale: 1:31,680 and 1:24,000

Significant changes to the Project Area and surrounding area shown on the USGS topographic maps from 1947 and 1950 compared with the previous maps consist of the following:

- The intersection of Vasquez Boulevard and State Highway 2 has been reconfigured;

- State Highway 85 is shown as an off-ramp from Vasquez Boulevard, tracking northeast to southwest from the southern portion of the Project Area; and
- Additional residential structures are shown in the areas surrounding the Project Area.

1957 USGS 7.5-Minute Series, Derby, CO; Scale: 1:24,000

Significant changes to the Project Area and surrounding area shown on the USGS topographic map from 1957 compared with the previous maps consist of the following:

- The roads are generally in their current configuration;
- Industrial, commercial, and residential development is shown in the surrounding area;
- Railroad spurs are shown crossing the southwest portion of the Project Area;
- Numerous ASTs are shown in the railroad junction area west of the Project Area;
- An oil refinery with numerous ASTs is shown across Sand Creek to the southwest; and
- The Mile High Kennel Club is shown adjoining the Project Area to the northeast.

1965 USGS 7.5-Minute Series, Commerce City, CO; Scale: 1:24,000

Significant changes to the Project Area and surrounding area shown on the USGS topographic map from 1965 compared with the previous map consist of the following:

- Clermont Street is shown west of Vasquez Boulevard in the Project Area;
- Additional structures are shown in the surrounding area;
- Several ASTs are shown adjoining the Project Area to the southwest; and
- I-270 and associated ramps are under construction south-southwest of the Project Area.

1971 USGS 7.5-Minute Series, Commerce City, CO; Scale: 1:24,000

Significant changes to the Project Area and surrounding area shown on the USGS topographic map from 1971 compared with the previous map consist of the following:

- Additional structures are shown adjoining and surrounding the Project Area; and
- Construction of I-270 is complete.

1980 and 1994 USGS 7.5-Minute Series, Commerce City, CO; Scale: 1:24,000

No significant changes to the Project Area or surrounding area are shown on the USGS topographic maps from 1980 and 1994 compared with the previous map. Development continues in the areas surrounding the Project Area.

2010, 2013, 2016, 2019, and 2022 USGS 7.5-Minute Series, Commerce City, CO; Scale: 1:24,000

The 2010, 2013, 2016, 2019, and 2022 USGS topographic maps with corresponding aerial photograph base maps show the Project Area and surrounding area as they appeared in the aerial photographs for the same period discussed above.

2.6 Previous Environmental Reports

ERO did not identify and was not made aware of any previous environmental reports for the Project Area.

2.7 Standard Environmental Record Sources

CDOT contracted with a commercial database search company, ERIS, to conduct a search of publicly available database records, which was provided to ERO (ERIS 2022b). All ASTM search distance sites are measured from the Project Area boundary.

ERO reviewed initial search results for inaccuracies using both field and mapping data sources. In addition, ERO attempted to locate orphan sites, those that lack adequate location information to map, using zip code, city name, site name, or other information. The Project Area was not identified in the search of publicly available database records. Sites identified in the surrounding area are discussed in the following sections and assessed as to their potential to be historical, known, or suspect RECs associated with the Project Area. A summary is included in Table 1, and copies of records reviewed are in Appendix B.

Table 1. Summary of publicly available environmental records.

Record Sources	Search Distance (miles) ¹	Project Area	No. of Sites in Surrounding Area
Federal NPL site list	1.0	No	2
Federal Delisted NPL site list	0.5	No	1
Federal SEMS list	0.5	No	1
Federal SEMS-Archive site list	0.5	Yes	18
Federal RCRA CORRACTS site list	1.0	No	14
Federal RCRA TSD facilities list	0.5	No	4
Federal RCRA generators list	Project Area and adjoining	No	12
Federal institutional control/engineering control registries	Project Area only	Yes	1
Federal ERNS list	Project Area only	No	0
State NPL-equivalent sites ²	1.0	No	0
State CERCLIS-equivalent sites ²	0.5	No	0
State landfill and/or solid waste disposal site list	0.5	No	47
State leaking storage tank list	0.5	Yes	56
State registered storage tank list	Project Area and adjoining	Yes	18
State institutional control/engineering control registries	Project Area only	Yes	1
State Voluntary Cleanup Program sites	0.5	No	11
State Brownfields sites	0.5	No	0

¹ASTM E1527-13/1527-21 standard search distances.

²In Colorado, the lead agency for National Priorities List (NPL)/CERCLA may be either the Environmental Protection Agency (EPA) or the CDPHE.

2.7.1 Federal National Priorities List

The NPL consists of properties with the highest priority for cleanup under the Superfund program pursuant to the EPA's Hazard Ranking System. Two NPL sites are located within 1 mile of the Project Area.

- Chemical Sales Co., at 4661 Monaco Street, is located about 0.38 mile northeast of the Project Area. A review of the 2022 Sixth Five-Year Review Report for the site indicated that all Operable Units (OU1 through OU4) are located east of the Project Area. Alluvial groundwater at the site reportedly flows to the north-northwest until it intersects a paleochannel at Quebec Street and flows to the north-northeast along the west boundary of the Rocky Mountain Arsenal (EPA 2022); and

- The Vasquez Boulevard and I-70 site is located about 0.92 mile southwest of the Project Area. The Vasquez Boulevard I-70 site includes about 4.5 square miles in north-central Denver associated with soil contamination from the historical Omaha and Grant and Argo Smelters. The site is generally located south of East 52nd Avenue along I-70 and between Pecos Street and Colorado Boulevard (EPA 2011).

Based on the distance and documented groundwater flow direction at the Chemical Sales NPL site and the distance to the Vasquez Boulevard/I-70 NPL site, **both sites are classified as a low-risk environmental condition.**

2.7.2 Federal Delisted NPL Site List

The EPA tracks sites that have been removed from the NPL because no further response is appropriate. One Delisted NPL site is located within 0.5 mile of the Project Area.

- The Sand Creek Industrial site is located about 0.23 mile south of the Project Area.

The Sand Creek Industrial NPL or Superfund Site, is located across Sand Creek to the south of the Project Area in an upgradient location with known groundwater contamination consisting of chlorinated solvents and petroleum hydrocarbons. In addition, chlorinated solvents have been detected in groundwater at a site located adjoining the Project Area, along the north side of East 60th Avenue, without a defined source (Slosky & Company, Inc. [Slosky] 1993).

Based on the upgradient location of the site, chlorinated solvent groundwater contamination, and unexplained detections of chlorinated solvents adjoining the Project Area, it is **classified as a medium-risk environmental condition.**

2.7.3 Federal Comprehensive Environmental Response, Compensation, and Liability Act Superfund Enterprise Management System

The federal Superfund program has deployed the Superfund Enterprise Management System (SEMS), which integrates multiple legacy systems into a comprehensive tracking and reporting tool. This inventory contains active sites evaluated by the Superfund program that are either proposed to be or are on the NPL as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. One SEMS-list site is located within 0.5 mile of the Project Area.

- The Weaver Electric Lot #2, at I-270 and Brighton Boulevard, is located about 0.4 mile west of the Project Area.

Based on the distance from the project area and the expected groundwater flow direction to the northwest, this facility is **classified as a low-risk environmental condition.**

2.7.4 Federal SEMS-Archive List

The federal SEMS-Archive list contains a listing of sites for which, once archived, the EPA has determined that assessment has been completed and no further remedial action is planned under the Superfund program at this time. According to this list, 18 SEMS-Archive sites are located within 0.5 mile of the Project Area (Table 2).

The **Ward Transport** site located in the Project Area, at **5901 Dexter Street**, was placed on the SEMS-Archive list due to being a transportation company that shipped some hazardous waste for Shell/Rocky Mountain Arsenal in 1981. However, the hazardous wastes were never brought onto the site at 5901 Dexter Street (Colorado Department of Health [CDH] 1986). **This site is classified as a medium risk environmental condition** site due to also being listed as a LUST site in and adjoining the Project Area.

The **Wagner Caterpillar** site, at **6000 Parkway Drive**, reportedly had a large oil sump that was removed and filled in in 1985. Samples were collected from the sump and did not contain chlorinated hydrocarbons (ERIS 2022b). Therefore, **this site is classified as a low risk environmental condition**.

According to CDPHE records for the **Dexter & 60th site, at 6001 Dexter site**, a subsurface investigation was conducted around a former truck wash on the site. Total petroleum hydrocarbon (TPH) soil contamination was identified in the vicinity of the truck wash, but VOCs and PAH concentrations in soil and groundwater were found to be below concentrations the CDPHE considered protective of groundwater and below State groundwater standards, respectively. This site is located in a downgradient location from the Project Area along East 60th Avenue and about 0.1 mile southeast of a portion of the Project Area crossing private parcels to the north of the site (CDPHE 2005). Therefore, **this site is classified as a low risk environmental condition**.

The **Stewart and Stevenson** site, at **5857 Dahlia Street**, was listed as brought to the EPA’s attention, but after an inspection in 1986 the site was determined to have a fenced maintenance yard for truck with no visible marking or staining observed on the site (ERIS 2022b). Therefore, **this site is classified as a low risk environmental condition**.

The **H.W. Moore Equipment Co.**, at 5990 Dahlia Street, was listed as brought to the EPA’s attention, but after an inspection in 1986 the site was determined to have a fenced sales area with storage of “some drums” with no labels and no evidence of spills (ERIS 2022b). This site has been redeveloped as a Walmart store, and therefore, **this site is classified as a low risk environmental condition**.

The remaining SEMS-Archive sites are **classified as a low risk environmental condition** based on their distances and/or downgradient direction from the Project Area.

Table 2. SEMS-Archive sites within 0.5 mile of the Project Area.

Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Ward Transport 5901 Dexter	Archived in 1986	In and adjoining the Project Area	Medium
Wagner Caterpillar 6000 Parkway	Archived in 1985	Adjoining the Project Area to the east	Low
Dexter & 60th 6001 Dexter	Archived in 1989	Adjoining the Project Area to the west	Low
Stewart And Stevenson 5857 Dahlia	Archived in 1986	Adjoining the Project Area to the southeast	Low
H.W. Moore Equipment Co. 5990 Dahlia Street	Archived in 1986	About 0.04 mile southeast of the Project Area	Low
Boyles Galvanizing Co 4400 E 61st Ave	Archived in 1980	About 0.06 mile west-northwest of the Project Area	Low
J.W. Brewer Tire Co. 5125 East 58th Place	Archived in 1986	About 0.08 mile south-southeast of the Project Area	Low

Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Colorado Truck Parts 7000 Eudora	Archived in 1985	About 0.09 mile north of the Project Area	Low
Conoco Inc 3975 E 58th Ave	Archived in 1980	About 0.11 mile southeast of the Project Area	Low
Thomasson Construction 5135 East 58th Place	Archived in 1986	About 0.13 mile south-southeast of the Project Area	Low
United Asphalt 4306 East 60th Avenue	Archived in 2013	About 0.14 mile south-southwest of the Project Area	Low
Landfill, Inc. 62nd and Brighton Blvd.	Archived in 2013	About 0.24 mile west of the Project Area	Low
Oil & Solvent Processing Co. 7130 Elm Drive	Archived in 1985	About 0.3 mile north-northeast of the Project Area	Low
Field In Adams CO 5390 E 72nd St	Archived in 1987	About 0.38 mile north-northeast of the Project Area	Low
Milt Adams, Inc. or Approved Drain Oil Service 5390 E 72nd Ave	Archived in 2016	About 0.41 mile north-northeast of the Project Area	Low
Conoco Inc 5801 Brighton Blvd	Archived in 1985	About 0.38 mile west-southwest of the Project Area	Low
Edson Express 5300 E 56th Ave.	Archived in 1985	About 0.40 mile south-southeast of the Project Area	Low
Northwest Transport 5601 Holly Street	Archived in 1986	About 0.48 mile southeast of the Project Area	Low

2.7.5 Federal Resource Conservation and Recovery Act Corrective Action Site List

The federal Resource Conservation and Recovery Act (RCRA) Corrective Action Site (CORRACTS) List provides a list of sites that have had or are undergoing corrective action or cleanup pursuant to the RCRA. According to this list, 14 CORRACTS sites are located within 1 mile of the Project Area (Table 3). **These sites are classified as low risk environmental conditions** due to the locations and distances from the Project Area.

Table 3. CORRACTS sites within 1 mile of the Project Area.

Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Oil & Solvent Process Company (Osco) 7130 Elm Dr	Corrective Action Process Terminated	About 0.25 mile north-northeast of the Project Area	Low
Phillips 66 Company - Denver Terminal 3960 E 56th Ave	Corrective Action Ongoing	About 0.34 mile south-southwest of the Project Area	Low
Approved Oil Services Inc 5390 E 72nd Ave	Corrective Action Process Terminated	About 0.28 mile north-northeast of the Project Area	Low
Kaneb Pipeline Co Release 5550 Vasquez Blvd	Corrective Action Process Terminated	About 0.4 mile south-southwest of the Project Area	Low
JCB Precision Tool & Mold 5460 N Colorado Blvd	Corrective Action Process Terminated	About 0.45 mile south-southwest of the Project Area	Low

Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Colorado Asphalt Services Inc 3700 E 56th Ave	Corrective Action Process Terminated	About 0.46 mile southwest of the Project Area	Low
Suncor Energy (USA) Inc East Plant 5800 Brighton Blvd	Corrective Action Ongoing	About 0.49 mile west-southwest of the Project Area	Low
Suncor Energy (USA) Inc - Commerce City Refinery 5801 Brighton Blvd	Corrective Action Ongoing	About 0.54 mile west-southwest of the Project Area	Low
Denver Refined Products Terminal 3601 E 56th St	Corrective Action Ongoing	About 0.54 mile southwest of the Project Area	Low
Phillips Pipeline 5442 N Colorado Blvd	Corrective Action Process Terminated	About 0.6 mile south-southwest of the Project Area	Low
Loctite Corporation 6120 E 58th Ave	Corrective Action Process Terminated	About 0.65 mile east-southeast of the Project Area	Low
Magellan Pipeline Company Commerce City 5601 Brighton Blvd	Corrective Action Ongoing	About 0.71 mile west-southwest of the Project Area	Low
Former Pickle Farm 7510 Brighton Blvd	Corrective Action Process Terminated	About 0.81 mile north-northeast of the Project Area	Low
Derby Cleaners 7220 Locust St	Corrective Action Ongoing	About 0.87 mile northeast of the Project Area	Low

2.7.6 Federal Resource Conservation and Recovery Information System

The Resource Conservation and Recovery Information System (RCRIS) includes two lists: (1) facilities on which treatment, storage, and/or disposal (TSD) of hazardous wastes occur; and (2) persons or entities that generate hazardous waste as defined and regulated by the RCRA. According to these lists, 4 TSD facilities are located within 0.5 mile of the Project Area and 12 hazardous waste generators are located adjoining the Project Area (Table 4). No violations or evidence of releases were identified for the generator sites adjoining the project area aside from two sites with violations associated with record keeping. Therefore, **these sites are classified as low risk environmental conditions.**

Table 4. RCRA hazardous waste generators adjoining the Project Area.

Site Address (Site Type)	Direction/Location	Risk Potential Classification (low, medium, high)
Azz Galvanizing Services - Denver 4400 E 61st Ave (RCRA NonGen)	Adjoining to the west-southwest of the Project Area	Low
Parkway Market Center 6025/75 Parkway Dr (RCRA NonGen)	Adjoining to the south-southeast of the Project Area	Low
6025/6075 Parkway Dr (Vacant Field) (RCRA NonGen)	Adjoining to the south-southeast of the Project Area	Low
Industrial Parts Depot 6121 Clermont (RCRA NonGen)	Adjoining to the west-southwest of the Project Area	Low

Site Address (Site Type)	Direction/Location	Risk Potential Classification (low, medium, high)
Grease Monkey 6000 Parkway Dr (RCRA NonGen)	Adjoining to the south-southeast of the Project Area	Low
4545 E 60th Ave Commerce City Co 4545 E 60th Ave (RCRA NonGen)	Adjoining to the southwest of the Project Area	Low
DSI Transport (Phillips Petr) 5901 Dexter St (RCRA NonGen)	Adjoining to the south of the Project Area	Low
Schmidt And Vigil Trucking 4500 E 60th Ave (RCRA NonGen)	Adjoining to the southwest of the Project Area	Low
Recycled Products Inc 5701 Dexter St (RCRA NonGen)	Adjoining to the south-southwest of the Project Area	Low
Hydrogate 6101 Dexter St (RCRA NonGen)	Adjoining to the west-southwest of the Project Area	Low
Steel Storage Systems Inc 6301 Dexter St (RCRA SQG)	Adjoining to the northwest of the Project Area	Low
Industrial Parts Depot 6121 Clermont (RCRA TSD)	Adjoining to the west-southwest of the Project Area	Low
Mill Road Overpass CDOT 6500 Us Hwy 85 (RCRA VSQG)	Adjoining to the north of the Project Area	Low
Union Pacific Railroad Co Rolla Fac 6230 Brighton Blvd (RCRA TSD)	About 0.22 mile west of the Project Area	Low
Suncor Energy (USA) Inc East Plant 5800 Brighton Blvd (RCRA TSD)	About 0.28 mile west-southwest of the Project Area	Low
Suncor Energy (USA) Inc - Commerce City Refinery 5801 Brighton Blvd (RCRA TSD)	About 0.38 mile west-southwest of the Project Area	Low

RCRA NonGen = sites that no longer generate hazardous waste; SQG = Small-quantity generator; TSD = Transfer storage and disposal facility.

2.7.7 Federal Institutional Control/Engineering Control Registries

The EPA lists sites with institutional or engineering controls in place that prevent exposure to contamination remaining on a site. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post-remediation care requirements. Engineering controls include various forms of caps, building foundations, liners, and treatment methods. According to the registry, a portion of the Project Area is located within a site listed as having institutional or engineering controls placed on it.

- The Mile High Greyhound Park, at 6200 Dahlia Street, is located in and adjoining the Project Area to the east-northeast and is listed as having institutional controls on it. The institutional

controls on the site restrict the use of groundwater beneath the site except for environmental sampling or remediation (Slosky 2020). This site is discussed further in Section 2.8.2.

Because this site is located in and adjoining the Project Area and the site has institutional controls associated restricting use of groundwater beneath the site, this facility is **classified as a medium-risk environmental condition**.

2.7.8 Federal Emergency Response and Notification System

The federal Emergency Response and Notification System (ERNS) List reports hazardous substance releases and spills in quantities greater than the reportable quantity as defined and regulated by CERCLA.

- No releases in the Project Area have been reported to the ERNS.

2.7.9 State NPL-Equivalent Sites

The CDPHE can be the lead agency (in addition to the EPA) for NPL sites in Colorado. All sites listed under this database are also listed in Section 2.7.1. No such sites were identified in the search of publicly available records.

2.7.10 State CERCLIS-Equivalent Sites

The CDPHE can be the lead agency for CERCLIS sites in Colorado. All sites listed under this database are also listed in Section 2.7.3. No such sites were identified in the search of publicly available records.

2.7.11 State Landfill and Solid Waste Disposal Sites

The CDPHE lists 24 historical landfill and 23 current solid waste disposal sites, for a total of 47 sites, located within 0.5 mile of the Project Area. The majority of these solid waste disposal sites are recyclers of tires and other items. One solid waste disposal site is located in the Project Area, and four solid waste disposal sites adjoin the Project Area:

- Mullen Tire and Service, at 5901 Dexter Street, is located on the southwest portion of the Project Area;
- The Former Commerce City Dog Track, at 6200 Dahlia Street, adjoins the northeast portion of the Project Area;
- Walmart Stores, Inc. dba Walmart Supercenter #2752, at 5990 Dahlia Street, adjoins the east portion of the Project Area;
- Caliber Recycled Products and Acugreen, at 6121 Clermont Street, adjoins the west portion of the Project Area; and
- Commerce City Ace Hardware, at 6900 Eudora Drive, adjoins the north portion of the Project Area.

Mullen Tire Service, Caliber Recycled Products and Acugreen, and Walmart are identified as tire recyclers and are **classified as a low-risk environmental condition**.

The Former Commerce City Dog Track is identified as maintaining an asbestos management plan with an environmental covenant/restrictive notice, which is **classified as a medium-risk environmental concern**.

Commerce City Ace Hardware is identified as a paint stewardship and is **classified as a low-risk environmental concern**.

2.7.12 State Leaking Storage Tank Sites

The CDLE/OPS lists no state leaking underground storage tank (LUST) or leaking aboveground storage tank (LAST) sites in the Project Area. Fifty-six (56) LUST or LAST sites are located within 0.5 mile of the Project Area (Table 5). All of the LUST/LAST sites listed have received regulatory closure. The sites marked with an asterisk (*) in the table adjoin the Project Area and therefore are discussed further in Section 2.8.3.

Table 5. LUST/LAST sites within 0.5 mile of the Project Area.

Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Harris Transportation 5901 Dexter St*	Closed	In and adjoining the Project Area	Medium
Grease Monkey #77 6000 Parkway Dr*	Closed	Adjoining to the south-southeast of the Project Area	Low
NWE Development Co 4851 E 60th Ave*	Closed	Adjoining to the north of the Project Area	Low
My Goods Market #6504 4981 E 64th Ave*	Closed	Adjoining to the north-northeast of the Project Area	Low
Hast Lumber Co 4801 E 60th Ave*	Closed	Adjoining to the south-southwest of the Project Area	Low
Chevron USA Inc #70273 5999 Dexter St*	Closed	Adjoining to the south of the Project Area	Low
Osmonics Denver Operations 4545 E 60th St*	Closed	Adjoining to the southwest of the Project Area	Low
Commerce City Public Works 4407 E 60th Ave*	Closed	Adjoining to the southwest of the Project Area	Low
Neff Rental 5850 Dahlia St*	Closed	Adjoining to the southeast of the Project Area	Low
Abandoned Vacant Lot 6560 Hwy 2	Closed	About 0.17 mile 5850 dahlis north-northeast of the Project Area	Low
Stewart & Stevenson Power 5840 Dahlia St	Closed	About 0.03 mile to the south of the Project Area	Low
Anderson Drilling 5775 Eudora St	Closed	About 0.04 mile to the south of the Project Area	Low
Riggs Oil Co 6795 Brighton Blvd	Closed	About 0.07 mile to the north of the Project Area	Low
SEM materials Co 4308 E 60th St	Closed	About 0.08 mile to the southwest of the Project Area	Low
Brewer Tire Co 5125 E 58th Pl	Closed	About 0.08 mile to the south-southeast of the Project Area	Low
Steel Inc 6245 Clermont St	Closed	About 0.1 mile to the west of the Project Area	Low

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Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Groendyke Transport Inc 6751 Brighton Blvd	Closed	About 0.1 mile to the north-northwest of the Project Area	Low
Burger In 6995 Brighton Blvd	Closed	About 0.1 mile to the north of the Project Area	Low
Joseph T Ryerson & Son 6600 Hwy 85	Closed	About 0.12 mile to the north-northwest of the Project Area	Low
Dittmer Trucking 6590 Brighton Blvd	Closed	About 0.12 mile to the north-northwest of the Project Area	Low
Georgia Haller 5142 E 58th Pl	Closed	About 0.14 mile to the south-southeast of the Project Area	Low
Cotter & Cotter Co 5751 Fairfax St	Closed	About 0.15 mile to the south-southeast of the Project Area	Low
Union Equity Co-Op Exchange 4600 E 64th Ave	Closed	About 0.15 mile to the west-northwest of the Project Area	Low
Best Refrigerated Express 5201 E 58th Ave	Closed	About 0.16 mile to the south-southeast of the Project Area	Low
Cummins Power Inc 5100 E 58th Ave	Closed	About 0.17 mile to the south-southeast of the Project Area	Low
Gahagen Iron & Metal Co 6512 Brighton Blvd	Closed	About 0.18 mile to the northwest of the Project Area	Low
Eason 6425 Brighton Blvd	Closed	About 0.22 mile to the northwest of the Project Area	Low
Denver Feed Co 6151 Brighton Blvd	Closed	About 0.25 mile to the west of the Project Area	Low
Nations Way Transportation Service Inc 5335 E 58th Pl	Closed	About 0.26 mile to the southeast of the Project Area	Low
Electric Power Equipment Co 5151 E 56th Ave	Closed	About 0.26 mile to the south-southeast of the Project Area	Low
Disposal & Recycling Inc 6091 Brighton Blvd	Closed	About 0.27 mile to the west-southwest of the Project Area	Low
Otto Logistics (At Waste Management) 6091 Brighton Blvd	Closed	About 0.27 mile to the west-southwest of the Project Area	Low
Circle K Store #2740669 5600 E 64th Ave	Closed	About 0.31 mile to the east-northeast of the Project Area	Low
Estes Express Lines 5555 E 58th Ave	Closed	About 0.32 mile to the southeast of the Project Area	Low
First Transit Inc #55820 6345 N Colorado Blvd	Closed	About 0.34 mile to the west of the Project Area	Low
Old Dominion Freight Line Inc. 5375 E 56th Ave	Closed	About 0.34 mile to the south-southeast of the Project Area	Low
Adams County Sch Dist Services Center 4211 E 68th Ave	Closed	About 0.34 mile to the north-northwest of the Project Area	Low
Transervco Inc 4055 E 64th Ave	Closed	About 0.36 mile to the west-northwest of the Project Area	Low
Acorn Food Store 5250 E 72nd Ave	Closed	About 0.36 mile to the north-northeast of the Project Area	Low
Approved Oil Service 5390 E 72nd Ave	Closed	About 0.38 mile to the north-northeast of the Project Area	Low

Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Suncor Energy (USA) Inc 5801 Brighton Blvd	Closed	About 0.38 mile to the west-southwest of the Project Area	Low
Suncor Contractor Complex 6215 Colorado Blvd	Closed	About 0.38 mile to the west of the Project Area	Low
Merchants Fast Motor Lines 5850 Holly St	Closed	About 0.38 mile to the east-southeast of the Project Area	Low
64th & Colorado Blvd 6390 Colorado Blvd	Closed	About 0.39 mile to the west-northwest of the Project Area	Low
UPS Freight 5300 E 56th Ave	Closed	About 0.4 mile to the south-southeast of the Project Area	Low
Denos 6 & 85 Restaurant 5555 Colorado Blvd	Closed	About 0.4 mile to the south-southwest of the Project Area	Low
Dairy Queen 5800 E 64th	Closed	About 0.4 mile to the east-northeast of the Project Area	Low
Honnen Equipment Co 5055 E 72nd Ave	Closed	About 0.41 mile to the north of the Project Area	Low
Valero Pipeline Terminal 3601 E 56th Ave	Closed	About 0.43 mile to the southwest of the Project Area	Low
Carts Of Colorado Facility 5750 Holly St	Closed	About 0.45 mile to the southeast of the Project Area	Low
Colorado Ice Cream Wagon Inc 6801 Colorado Blvd	Closed	About 0.46 mile to the northwest of the Project Area	Low
Sara Lee 7300 Brighton Blvd	Closed	About 0.47 mile to the north-northeast of the Project Area	Low
Westway Express Inc 7270 Dahlia St	Closed	About 0.47 mile to the north of the Project Area	Low
R&I Enterprises 5600 E 72nd Ave	Closed	About 0.47 mile to the north-northeast of the Project Area	Low
Old Dominion Freight Line Inc 5601 Holly St	Closed	About 0.48 mile to the southeast of the Project Area	Low
Maddox Gas & Oil Inc 5591 E 72nd Ave	Closed	About 0.48 mile to the north-northeast of the Project Area	Low

*Facility discussed further in Section 2.8.3.

2.7.13 State Registered Storage Tank Sites

CDLE/OPS lists 18 registered storage tank sites in or adjoining the Project Area (Table 6). The Harris Transportation site is discussed further in Section 2.8.3.

Table 6. Registered storage tank sites in and adjoining the Project Area.

Site Address	Tank Size-Type/Contents/Status	Direction/Location	Risk Potential Classification (low, medium, high)
Harris Transportation 5901 Dexter St	1 12,000-gallon UST/Diesel/Closed 1 10,000-gallon UST/Diesel/Closed 2 5,000-gallon UST/Diesel/Closed	In and adjoining the Project Area	Medium
Grease Monkey #77 6000 Parkway Dr	1 2,000-gallon UST/Unknown/Closed 1 1,000-gallon UST/Used Oil/Closed 2 530-gallon AST/Active	Adjoining the Project Area to the south-southeast	Low

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Site Address	Tank Size-Type/Contents/Status	Direction/Location	Risk Potential Classification (low, medium, high)
Neff Rental 5850 Dahlia St	1 1,250-gallon AST/LPG/Closed 1 2,000-gallon AST/Diesel/Closed 1 1,000-gallon AST/LPG/Closed 1 1,250-gallon AST/LPG/Closed	Adjoining the Project Area to the south	Low
Stewart & Stevenson Power 5840 Dahlia	1 800-gallon AST/Unknown/Closed	Adjoining the Project Area to the south	Low
Ace Hardware 6900 Eudora Dr	1 500-gallon AST/LPG/Active	Adjoining the Project Area to the north	Low
Sem Materials 4310 E 60th Ave	1 35,700-gallon AST/Other/Active 2 9,399-gallon AST/Asphalt/Active	Adjoining the Project Area to the southwest	Low
Stewart & Stevenson Power 5840 Dahlia St	1 850-gallon AST/Diesel/Closed	Adjoining the Project Area to the south	Low
Walmart Supercenter #2752 5990 Dahlia St	1 2,400-gallon AST/Diesel/Active	Adjoining the Project Area to the southeast	Low
Parkway Market Center 6000 Dahlia St	1 2,000-gallon UST/Unknown/Closed 1 1,000-gallon UST/Used Oil/Closed 1 530-gallon AST/Lube Oil/Closed 1 530-gallon AST/Used Oil/Active	Adjoining the Project Area to the south	Low
King Soopers #92 Fuel Facility 6175 Parkway Dr	2 USTs Never Installed-Permit Revoked	Adjoining the Project Area to the east	Low
Columbia Western 6001 Dexter St	1 500-gallon UST/Used Oil/Closed 1 1,000-gallon UST/Gasoline/Closed	Adjoining the Project Area to the south-southwest	Low
NWE Development Co 4851 E 60th Ave	2 Unknown USTs/Unknown/Closed	Adjoining the Project Area to the south-southwest	Low
Hast Lumber Co 4801 E 60th Ave	1 550-gallon UST/Gasoline/Closed 1 3,000-gallon UST/Diesel/Closed 1 3,000-gallon UST/Closed	Adjoining the Project Area to the south-southwest	Low
Chevron USA Inc #70273 5999 Dexter St	2 4,000-gallon UST/Gasoline/Closed 1 6,000-gallon UST/Gasoline/Closed 1 550-gallon UST/Used Oil/Closed	Adjoining the Project Area to the south	Low
Osmonics Denver Operations 4545 E 60th St	1 1,000-gallon UST/Unknown/Closed	Adjoining the Project Area to the southwest	Low
Unknown 4500 E 60th	1 2,000-gallon UST/Unknown/Closed	Adjoining the Project Area to the southwest	Low
Commerce City Public Works 4407 E 60th Ave	1 2,000-gallon UST/Gasoline/Closed 1 2,000-gallon UST/Diesel/Closed 1 10,000-gallon UST/Gasoline/Closed 1 600-gallon UST/Used Oil/Closed 1 500-gallon UST/Used Oil/Closed	Adjoining the Project Area to the southwest	Low
Industrial Parts Depot 6121 Clermont St	1 2,000-gallon UST/Unknown/Closed	Adjoining the Project Area to the west-southwest	Low

2.7.14 State Institutional Control/Engineering Control Registries

The CDPHE maintains a list of all sites that have been issued environmental covenants that dictate institutional or engineering controls on real property to mitigate potential exposure to contaminants. One site with state-recorded environmental covenants or institutional controls is listed for the Project Area.

- The Mile High Greyhound Park, at 6200 Dahlia Street, is located in and adjoining the Project Area to the east-northeast and is listed as having institutional controls on it. The institutional controls on the site restrict the use of groundwater beneath the site except for environmental sampling or remediation (Slosky 2020). This site is discussed further in Section 2.8.2.

Because this site is located in and adjoining the Project Area and the site has institutional controls associated restricting use of groundwater beneath the site and asbestos in soils were remediated on the site in accordance with an approved Asbestos Contaminated Soil Management Plan, this facility is **classified as a medium-risk environmental condition.**

2.7.15 State Voluntary Cleanup Program Sites

The CDPHE lists 11 Voluntary Cleanup Program (VCP) sites within 0.5 mile of the Project Area (Table 7). The Greyhound Flats site is discussed further in Section 2.8.2.

Table 7. VCP sites within 0.5 mile of the Project Area.

Site Address	Status	Direction/Location	Risk Potential Classification (low, medium, high)
Greyhound Flats 6200 Dahlia St.	NAD	Adjoining to the northeast of the Project Area	Medium
Alsup Elementary School Site 4413 E. 68th Ave.	VCUP Approval	About 0.24 mile to the north-northwest of the Project Area	Low
Conter Trust Property 60th Ave. & Holly St.	NAD	About 0.3 mile to the east-southeast of the Project Area	Low
Sand Creek Business Park 3975 E. 56th Ave.	NAD	About 0.31 mile to the south-southwest of the Project Area	Low
G.I. Trucking Company 5555 E. 58th Ave.	NAD	About 0.32 mile to the southeast of the Project Area	Low
Skelly Oil Refinery/Riss Trust Property 7170 Dahlia St.	NAD	About 0.35 mile to the north of the Project Area	Low
Johnson Estate 5800 Holly St.	NAD	About 0.4 mile to the southeast of the Project Area	Low
Adams County School District 14; Alsup Elementary 7101 Birch St.	VCUP Approval	About 0.41 mile to the north-northwest of the Project Area	Low
Clark Family Holdings 3900 E. 64th Ave. and 6375 Colorado Blvd.	NAD	About 0.43 mile to the west-northwest of the Project Area	Low
Ferrellgas 3801 E. 56th Ave.	NAD	About 0.43 mile to the southwest of the Project Area	Low
Approved Oil (N. Parcel) 5551 E. 72nd Ave.	NAD	About 0.45 mile to the north-northeast of the Project Area	Low

NAD = No Action Determination; and VCUP = Voluntary Cleanup Plan.

Attachment A.

Project Information

and flowed to the northwest, toward the Project Area. Based on contaminant concentrations, monitored natural attenuation was selected as the corrective action for the site. Groundwater monitoring continued at the site until 2004 when all petroleum constituents were below CDLE/OPS RBSLs (CGRS, Inc. 2004). The site received regulatory closure on March 23, 2004 (CDLE/OPS 2004).

NWE Development Company, 4851 E 60th Ave. The NEW Development Company is located on the northwest corner of East 60th Avenue and Dexter Street. Excavations were conducted in 1993 to confirm the removal of two USTs historically located on the site, without documentation of the removal. Two areas were excavated with no USTs found, and approximately 30 cubic yards of petroleum contaminated soil were removed. Sample analytical results from the soil removed indicated that the contaminant was diesel fuel and a follow up subsurface investigation was completed. Groundwater was encountered at about 15 feet bgs and flowed to the northwest. No petroleum hydrocarbons, except for TEPH, were detected in the groundwater samples collected, however chlorinated solvents (tetrachloroethene and trichloroethene) were detected in all of the groundwater samples collected as part of the investigation, including the upgradient monitoring wells (Slosky 1993). The CDH granted the site regulatory closure on May 26, 1993 (CDH 1993).

My Goods Market #6504, 4981 East 64th Avenue. My Goods Market (formerly ConoMart) is located northeast of East 64th Avenue and State Highway 2, adjoining the Project Area to the northeast. On September 20, 1994, four 10,000-gallon and three 8,000-gallon USTs were removed from the site. Approximately 1,113 cubic yards of petroleum-contaminated soil was excavated from two tank pits and disposed off-site (Secor Environmental Engineering (Secor) 1994a). Additional investigation to delineate the extent of soil and groundwater contamination occurred between October 1994 and February 1996. The depth to groundwater at the facility was reported between 14.7 and 17.18 feet bgs and flowed to the northwest, toward the Project Area (Secor 1994b). Groundwater monitoring continued at the facility until all petroleum constituents were below CDLE/OPS RBSLs (Secor 1996). The site received regulatory closure on July 22, 1996 (CDLE/Oil Inspection Section [OIS] 1996a).

Hast Lumber Company, 4801 East 60th Avenue. Hast Lumber Company is located northwest of East 60th Avenue and Vasquez Boulevard, adjoining the Project Area along the north side of East 60th Avenue. On August 31, 1989, a 560-gallon gasoline UST was removed from the site. One composited soil sample, collected from the base of the tank excavation and from the over excavated soils, was submitted for analysis of TPH. No petroleum compounds were detected in the soil sample (James P Walsh & Associates Inc. [Walsh] 1989). The 1989 tank closure does not have an Event ID and it does not appear that a closure letter was formally issued by CDLE/OIS. On April 18, 1990, a 3,000-gallon gasoline UST and a 3,000-gallon diesel UST were removed from the site. Soil samples collected from the excavation did not contain concentrations of benzene, toluene, ethylbenzene, and xylenes (collectively BTEX) or TPH greater than regulatory limits. Groundwater was not encountered during the excavation activities (Ken Meyer & Associates, Inc. 1990). The site received regulatory closure on April 15, 1996 (CDLE/OIS 1996b).

Chevron USA Inc. #70273, 5999 Dexter Street. Chevron USA Inc. is located on the southwest corner of Dexter Street and East 60th Avenue, adjoining the Project Area. On January 1, 1986, two 4,000-gallon

gasoline USTs, one 6,000-gallon gasoline UST, and one 560-gallon waste oil UST were removed from the site. Twelve monitoring wells were installed at the site to monitor the petroleum hydrocarbon contamination. Free product (liquid petroleum hydrocarbons) was reportedly measured in three monitoring wells at the site in 1989; however, the 1990 report indicated that free product remained in only one well, immediately downgradient of the former structure. The remaining 11 monitoring wells on the site were sampled for BTEX and TPH, with detectable petroleum concentrations in nine of the wells at the site (Groundwater Technology Inc. 1990). Remedial activities, including the installation of a soil vapor extraction system, and groundwater monitoring was conducted at the site through July 1996. Groundwater BTEX and TPH concentrations remained in several wells at the site during the 1995 sampling events; however, two wells located within the East 60th Avenue ROW had not contained petroleum concentrations since June 1992 and February 1993, respectively (Delta Environmental Consultants, Inc. 1996). The site received regulatory closure on August 9, 1996 (CDLE/OIS 1996c).

Osmonics Denver Operations, 4545 East 60th Street. The Osmonics Denver Operations site is located north and east of the Project Area, on the north side of East 60th Avenue. A 1,000-gallon gasoline UST was removed from the north portion of the site in January 1999 and no contamination was identified during the removal (Harner Environmental Management, Inc. [Harner] 1999). The site was granted regulatory closure by the CDLE/OIS on March 17, 1999 (CDLE/OIS 1999).

Commerce City Public Works, 4407 East 60th Avenue. Commerce City Public Works is located on the northwest corner of East 60th Avenue and Clermont Street, adjoining the Project Area to the west. This site formerly maintained five USTs, which were removed on three separate occasions in 1991 and 1992. On September 20, 1991, a 560-gallon waste oil UST was removed from the site. Three soil samples were collected from the base of the excavation and analyzed for BTEX and TPH. No petroleum compounds were detected above the laboratory method detection limits (MDLs) in the soil samples collected from the excavation. Approximately 7 cubic yards of impacted soils were removed and disposed off-site. The UST removal did not result in a LUST event (Walsh 1991).

On June 4, 1992, one 2,000-gallon diesel UST, one 2,000-gallon gasoline UST, and one 12,000-gallon gasoline UST were removed from one tank pit on the site. Soil samples were collected from the tank pit and analyzed for BTEX and TPH. No petroleum compounds were detected above regulatory limits except for two samples collected from the east side of the excavation (Walsh 1992a). Groundwater was not encountered during the excavation activities. Additional site characterization and remediation occurred on the site, including the installation of groundwater monitoring wells and an air sparge/soil vapor extraction (AS/SVE) system. The AS/SVE system was installed in September 1994 and operated through March 1996, with quarterly groundwater monitoring from November 1994 through May 1997. Groundwater monitoring results indicated that BTEX concentrations at all monitoring wells sampled were below regulatory limits with the exception of a benzene concentration in MW-6 (22 micrograms per liter [$\mu\text{g/L}$]), in May 1997, which is above the regulatory limit of 5 $\mu\text{g/L}$. The groundwater flow direction was consistently reported to the northwest during the monitoring events. Based on a computer model in support of site closure submitted by Walsh in 1999, benzene concentrations in MW-6 did not “pose a significant threat to human health” (Walsh 1999). The site received regulatory closure on January 18, 2000 (CDLE/OIS 2000).

In addition, on August 3, 1992, a 1,000-gallon empty UST and a 560-gallon heating oil UST were removed from the site. Evidence of small holes and corrosion were noted on the tanks; however, indications of a release were not observed during the removal activities. Three soil samples were collected from the base of the excavations and submitted for BTEX and TPH analyses. None of the concentrations exceeded their respective regulatory limits (Walsh 1992b). The removal of the empty and heating oil USTs did not result in a LUST event.

Harris Transportation, 5901 Dexter Street. Harris Transportation is located southwest of East 60th Avenue and Vasquez Boulevard, adjoining the Project Area. This facility has two documented releases with CDLE/OPS, Event ID 4492 and Event ID 11888. On October 4, 1989, two 3,000-gallon, one 4,000-gallon, and two 5,000-gallon diesel USTs were removed from the site (Event ID 4492). Soil samples were collected from the most visually impacted areas and analyzed for petroleum compounds. The soil samples contained TPH concentrations in excess of regulatory standards. BTEX was also detected in the samples submitted; however, the values did not exceed regulatory standards (The WCM Group, Inc. [WCM] 1989). In November 1989, 24 soil borings were drilled across the site, six of which were converted into temporary groundwater monitoring wells. Based on field screening activities, soil samples were submitted for TPH and BTEX analyses from 10 borings. BTEX was not detected above the laboratory MDLs in any of the soil samples submitted for analysis. TPH concentrations were between 0 and 17,300 mg/kg in the soil samples submitted for analysis. Six groundwater samples were submitted for TPH and BTEX analyses. No petroleum concentrations were detected above their respective MDLs in the groundwater samples except for one TPH concentration. The depth to groundwater at the facility was reported between 14 and 17 feet bgs, and the groundwater flow direction was to the northwest. Soil and groundwater contamination was reportedly limited to the site, around the former UST basin (WCM 1990). WCM proposed over excavation of the impacted soils and groundwater monitoring of the site; however, it appears that several years passed before any additional activities were conducted at the site. In 1997, ERM – Rocky Mountain Group (ERM) submitted a Corrective Action Plan (CAP) for the site, which indicated that over excavation and disposal of approximately 1,200 cubic yards of petroleum-impacted soils was conducted in August and September 1990. The CAP proposed the installation and sampling of additional groundwater monitoring wells for two quarters (ERM 1997a). Five monitoring wells were sampled in the subsequent quarters in 1997 and did not contain BTEX or TPH concentrations (ERM 1997b). The site received regulatory closure for Event ID 4492 on February 9, 1998 (CDLE/OIS 1998).

On July 17, 2013, one 10,000-gallon and two 12,000-gallon diesel USTs were removed from the site. Soil samples were collected from below the USTs, dispensers, and piping run and analyzed for BTEX, diesel-range organics (DRO), and oil and grease. No BTEX concentrations were detected in the soil samples collected from the excavation. The DRO concentrations in the soil samples exceeded regulatory standards and no polycyclic aromatic hydrocarbons were detected (CGRS, Inc. 2013). Groundwater was not encountered during the UST removal activities. On August 7, 2013, CGRS, Inc. installed three groundwater monitoring wells. Groundwater samples were analyzed for BTEX, methyl tertiary butyl ether (MTBE), and DRO. No BTEX or MTBE concentrations were detected in the groundwater samples. The depth to groundwater on the site was approximately 16.3 feet bgs and flowed to the west-

northwest. The site received regulatory closure for Event ID 11888 on September 6, 2013 (CDLE/OPS 2013).

Neff Rental, 5850 Dahlia Street. Neff Rental is located southeast of the Project Area, on the east side of Vasquez Boulevard. According to the February 12, 1999 CAP, two 110-gallon waste oil USTs, one 1,000-gallon diesel UST, and one 1,000-gallon gasoline UST were removed from the site in 1993 (Jehn Environmental, Inc. [Jehn] 1999). An unknown amount of petroleum impacted soil was removed from the excavations and groundwater samples were collected from the pits. A CAP was requested by the CDLE/OIS in February 1998, and two monitoring wells were installed in the former tank pit areas on the site. No BTEX concentrations were detected in the groundwater samples except for a low concentration of toluene in MW-2, in the east pit (Jehn 1999). The site received regulatory closure on July 21, 1999 (CDLE/OIS 1999).

2.8.4 Colorado Division of Water Resources

ERO reviewed records maintained by the Colorado Division of Water Resources (CDWR) for the Project Area. The CDWR has no records of wells in the Project Area and one monitoring well adjoining the Project Area, at the intersection of Parkway Drive and East 60th Avenue, east of Vasquez Boulevard. The well was installed in 1988 for Chevron USA to a depth of 25 feet bgs. The static water level was not reported (CDWR 2022). An additional well was listed in the same area for the Mile High Kennel Club; however, it does not appear that the well was completed.

3.0 Site Reconnaissance

3.1 Methodology and Limiting Conditions

Courtney Sockwell, an Environmental Professional with ERO, conducted the site reconnaissance on August 18, 2022. He investigated the entire Project Area by walking and driving the Project Area except for two private parcels (6290 Clermont Street and 6101 Dexter Street) where access was not granted. Those parcels were partially viewed from the property boundaries. In addition, the northernmost parcel of the Project Area at East 69th Avenue was fenced and, therefore, was observed from the boundaries. Representative photographs taken during the site reconnaissance are presented in Appendix A.

3.2 General Site Setting

The Project Area consists of road ROWs for Vasquez Boulevard from East 60th Avenue to East 64th Avenue, and portions of Parkway Drive, East 60th Avenue, East 62nd Avenue, and Clermont Street. In addition, portions of the Project Area are located on private parcels west of Vasquez Boulevard and a parcel currently being used for stormwater detention and water quality at East 69th Avenue.

The portions of the Project Area located within road ROWs generally consist of paved roads, sidewalks, landscaped areas, parking lots, and undeveloped ROWs. The portions of the Project Area on private parcels in the southwest portion of the Project Area (5901 Dexter Street, 4500 East 60th Avenue, 6290 Clermont Street, and 6101 Dexter Street) consist of industrial yards used for precast concrete tank storage, equipment and material storage, vehicle parking, and an informal stormwater detention area.

The parcel in the northernmost portion of the Project Area at East 69th Avenue is being used for stormwater detention and water quality.

Numerous painted metal structures potentially painted with LBP were observed in the Project Area during the site reconnaissance. No materials typically associated with potential ACM were observed in the Project Area but buried utilities in the Project Area could contain asbestos.

The Project Area is adjoined by commercial, industrial, and undeveloped land. The topography in the vicinity of the Project Area generally slopes to the west-southwest.

3.2.1 Storage Tanks

No vent pipes, fill ports, tank pits, or other indications of USTs were observed in the Project Area. No aboveground petroleum storage tanks were observed in the Project Area.

3.2.2 Odors

No strong, pungent, or noxious odors were noted during the site reconnaissance.

3.2.3 Pools of Liquid

No pools of liquid were observed in the Project Area.

3.2.4 Drums/Containers

No drums or containers were observed in the Project Area.

3.2.5 Hazardous Substance and Petroleum Products Materials/Waste Use or Storage

No hazardous substances or petroleum products were observed to be used or stored in the Project Area.

3.2.6 Transformers/PCBs

Numerous pole-mounted electrical transformers were observed in and adjoining the Project Area. No indications of leakage were observed on or beneath the transformers.

3.3 Exterior Observations

3.3.1 Pits, Ponds, and Lagoons

ERO did not identify or observe any pits, ponds, or lagoons on or adjacent to the Project Area. An informal stormwater detention area was observed in the southwest portion of the Project Area on the parcel at 4500 East 60th Avenue.

3.3.2 Stained Soil or Pavement

Aside from spills of *de minimis* quantities of petroleum products and automotive fluids observed in and adjoining the Project Area, no areas of stained soils or pavement were observed in the Project Area.

3.3.3 Stressed Vegetation

3.3.4 Solid Waste Disposal

Aside from windblown trash and litter, no indications of solid waste disposal or filled or graded areas was observed in the Project Area. In addition, a dumpster with trash in the surrounding area was observed on the parcel at 4500 East 60th Avenue.

3.3.5 Wastewater Discharge

ERO did not observe any wastewater discharge systems into which wastewater and liquids in or adjacent to the Project Area discharge.

3.3.6 Wells

ERO did not observe any monitoring, domestic, irrigation, injection, abandoned, or other wells in the Project Area.

3.3.7 Process Equipment

No manufacturing, remediation, or other chemical process equipment was observed in the Project Area.

3.3.8 On-Site Septic Systems

ERO did not observe any indications of on-site septic systems or cesspools in the Project Area.

4.0 Interviews

4.1 Interviews with Local Government Officials

4.1.1 Interview with Local Health Department

Due to most of the Project Area being assessed for publicly owned ROWs, ERO did not request a records search from the Tri-County Health Department (TCHD). ERO was able to review the TCHD online landfill mapping database, and no current or historical landfills were identified on or adjoining the Project Area (TCHD 2022).

4.1.2 Interview with Local Fire Department

Due to most of the Project Area being assessed for publicly owned ROWs, ERO did not request a records search from the local fire department.

5.0 Evaluation

5.1 Findings

The Project Area consists of road ROWs for Vasquez Boulevard from East 60th Avenue to East 64th Avenue, and portions of Parkway Drive, East 60th Avenue, East 62nd Avenue, and Clermont Street. In

addition, portions of the Project Area are located on private parcels west of Vasquez Boulevard and a parcel currently being used for stormwater detention and water quality at East 69th Avenue.

Federal, state, and local records identified the following sites or incidents typically associated with potential RECs in or near the Project Area:

- 2 NPL sites;
- 1 Delisted NPL site;
- 1 SEMS site;
- 18 SEMS-Archive sites;
- 14 RCRA CORRACTS sites;
- 4 RCRA TSD sites;
- 12 RCRA Generator sites;
- 1 site with institutional controls;
- 24 historical landfill and 23 current solid waste disposal sites;
- 56 LUST/LAST sites;
- 18 registered storage tanks sites;
- 1 State institutional control/engineering control registries; and
- 11 VCP sites.

Numerous electrical transformers were identified in and adjoining the Project Area. In addition, numerous areas of soil staining resulting from spills of *de minimis* quantities of petroleum products and automotive fluids and areas containing trash and litter on the surface were observed.

Numerous painted metal structures potentially painted with LBP were observed in the Project Area during the site reconnaissance. No materials typically associated with potential ACM were observed in the Project Area but buried utilities in the Project Area could contain asbestos.

5.2 Opinion

A summary of identified findings and ERO’s determination if the findings constitute RECs associated with the Project Area is presented in Table 8.

Table 8. Findings and opinion summary.

Finding	Risk Potential Classification (low, medium, high)	REC, CREC, HREC, or PEC?	Rationale
2 NPL sites	Low	PEC	Numerous sites with the potential to have adversely impacted soil and groundwater occur in the Project Area. Regional groundwater contamination without a specific identified source has been
1 Delisted NPL site (Sand Creek Industrial site)	Medium		
1 SEMS site	Low		
18 SEMS-Archive sites	Low		
14 RCRA CORRACTS sites	Low		
4 RCRA TSD sites	Low		
12 RCRA Generator sites	Low		

Finding	Risk Potential Classification (low, medium, high)	REC, CREC, HREC, or PEC?	Rationale
The Mile High Greyhound Park (6200 Dahlia Street) Institutional controls	Medium		identified in the vicinity of the Project Area. The Former Commerce City Dog Track/Mile High Greyhound Park/Greyhound Flats, at 6200 Dahlia Street, is listed as a solid waste disposal site, has institutional controls, and a VCP site in and adjoining the Project Area.
Former Commerce City Dog Track (6200 Dahlia Street) solid waste disposal site	Medium		
46 remaining landfill and solid waste disposal sites	Low		
Harris Transportation LUST site (5901 Dexter Street)	Medium		
55 remaining LUST/LAST sites	Low		
Harris Transportation registered storage tank site (5901 Dexter Street)	Medium		
17 remaining registered storage tank sites	Low		
1 State institutional control/engineering control registries site (The Mile High Greyhound Park) (6200 Dahlia Street)	Medium		
Greyhound Flats VCP site (6200 Dahlia Street)	Medium		
10 remaining VCP sites	Low		
Electrical transformers in the Project Area	NA	PEC	While no indications of leakage were observed on or around any of the transformers, should any electrical transformers be disturbed, there is the potential to encounter transformer oils containing PCBs.
Painted metal structures in the Project Area	NA	PEC	The painted metal structures are potentially painted with LBP and, therefore, will require special handling if planned for removal and disposal.
Buried utilities potentially containing asbestos	NA	PEC	It is unknown if buried utilities containing asbestos are present in the subsurface of the Project Area.

5.3 Conclusions and Recommendations

ERO performed this MESA in conformance with the scope and limitations of the CDOT requirements detailed in CDOT’s **Hazardous Material Guidance**, dated June 2018 (CDOT 2018) of the Vasquez Boulevard, I-270 to 64th Avenue Transportation Improvements Project in Commerce City, Colorado. Any modifications or limitations from this practice are described in Section 1.3 of this report.

This assessment has identified numerous sites in and adjoining the Project Area as PECs in connection with the Project Area:

- Sand Creek Industrial Site, the Mile High Greyhound Park/Former Commerce City Dog Track site/Mile High Greyhound Park/Greyhound Flats VCP site, and the Harris Transportation are the sites identified as medium environmental risk sites associated with the Project Area.

The following PECs associated with the Project Area were identified during the site reconnaissance:

- ERO's inability to access two private parcels in the Project Area;
- Electrical transformers potentially containing PCBs in and adjoining the Project Area;
- The painted metal poles and other structures potentially painted with LBP, which will require special handling if planned for removal and disposal; and
- Buried utilities containing asbestos potentially located in the Project Area.

ERO recommends the following:


- Conducting follow-up Phase I ESAs for private parcels of land where new roads will be constructed and significant ROWs will be acquired by CDOT;
- Conducting additional subsurface investigations for areas of the Project Area where soil excavation will occur with the potential for worker exposure to contaminated soil and/or groundwater and additional waste handling requirements associated with contaminated materials;
- Preparing a materials management plan for the project to identify how the contractor will manage hazardous materials during construction;
- Ensuring that if painted metal items identified in the Project Area are slated for removal and disposal, the contractor shall test for LBP and, if present, removing, disposing, or recycling of the painted components shall be done in compliance with CDOT Specification 250 - Environmental Health & Safety Management (including, but not limited to, Section 250.04) and all applicable Occupational Safety and Health Administration (OSHA), local, state, and federal regulations;
- Contractors and workers shall comply with the Colorado Department of Transportation's (CDOT) latest Revision of Section 250 – Environmental, Health and Safety Management of the Standard Specifications for Road and Bridge Construction;
- Workers shall be alert during excavations for any visual or olfactory signs of contamination. If gas, soil and/or groundwater contamination is encountered, work will stop immediately, and the procedures outlined in the CDOT Specification 250 and subsection 107.25.(b) shall be followed;
- Structural excavation, such as caisson and retaining wall construction, may require the dewatering of contaminated groundwater. If dewatering is necessary, groundwater brought to the surface will be managed according to Section 107.25 of the CDOT Standard Specifications for Road and Bridge Construction and permitted by the CDPHE Water Quality Control Division, in accordance with Section 402 of the Clean Water Act; and
- If any drinking water and groundwater monitoring wells are located within the proposed construction area, the wells will be abandoned and plugged according to CDOT Section 202.02 in Standard Specifications for Road and Bridge Construction and in conformance with the Colorado Department of Natural Resources Division of Water Resources State Engineer Water Well Construction Rules, specifically Rule 16, "Standards for Plugging, Sealing, and Abandoning Wells and Boreholes."

5.4 Environmental Professionals Statement

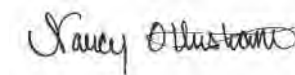
“We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 40 CFR 312.10. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.”



Courtney Sockwell
Environmental Professional



Craig Sovka
Environmental Professional



Nancy Otterstrom
Environmental Professional

The qualifications of the personnel noted above are listed in Appendix C.

6.0 References

- Adams County Assessor's Office. 2022. Online parcel database. <https://www.adcogov.org/gis-interactive-maps>. Last accessed August 3.
- ASTM International (ASTM). 2013. Annual Book of ASTM Standards. "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." Philadelphia: ASTM E1527-13.
- ASTM International (ASTM). 2021. Annual Book of ASTM Standards. "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." Philadelphia: ASTM E1527-21.
- CGRS, Inc. 2013. Closure Report, Harris Transportation Company, LLC, 5901 Dexter Street, Commerce City, Colorado. October 22.
- CGRS, Inc. 2004. Closure Report, Grease Monkey #77, 6000 E. Parkway Drive, Commerce City, Colorado. May 24.
- Colorado Department of Health (CDH). 1986. Hazardous Waste Inspection Report, Ward Transport, 5901 Dexter Street, Commerce City, Colorado. February 25.
- Colorado Department of Health (CDH). 1993. Underground storage tank closure at NW Development Company, 60th Avenue and Dexter, Commerce City, Colorado. May 26.
- Colorado Department of Labor and Employment, Division of Oil and Public Safety (CDLE/OPS). 2004. Approval of Corrective Action Plan (CAP) and Site Closure for Grease Monkey #77, 6000 E. Parkway Dr., Commerce City, Adams County, Colorado (Event ID 9035). March 23.
- Colorado Department of Labor and Employment, Division of Oil and Public Safety (CDLE/OPS). 2013. No Further Action (NFA) determination at Harris Transportation, 5901 Dexter Street, Commerce City, Adams County, Colorado (Event ID 11888). September 6.
- Colorado Department of Labor and Employment, Oil Inspection Section (CDLE/OIS). 1996a. Closure for Petroleum Storage Tanks at Conoco #6360, 4981 East 64th Avenue, Commerce City, Adams County, Colorado. July 22.
- Colorado Department of Labor and Employment, Oil Inspection Section (CDLE/OIS). 1996b. Closure for Petroleum Storage Tank(s) at Hast Lumber Company, 4801 E 60th Ave, Commerce City, Adams County, Colorado. April 15.
- Colorado Department of Labor and Employment, Oil Inspection Section (CDLE/OIS). 1996c. Closure for Petroleum Storage Tanks at Chevron #7-0273, 5999 Dexter Street, Commerce City, Adams County, Colorado. August 7.
- Colorado Department of Labor and Employment, Oil Inspection Section (CDLE/OIS). 1998. No Further Action Required for 5901 Dexter Street Property, Commerce City, Colorado. February 9.
- Colorado Department of Labor and Employment, Oil Inspection Section (CDLE/OIS). 1999. No Further Action Required for Osmonics, 4545 East 60th Avenue, Commerce City, Colorado. March 17.
- Colorado Department of Labor and Employment, Oil Inspection Section (CDLE/OIS). 1999. No Further Action Required for JRJ Properties, 5859 Dahlia, Commerce City, Colorado. July 21.

- Colorado Department of Labor and Employment, Oil Inspection Section (CDLE/OIS). 2000. Petroleum Storage Tanks (PST) at Commerce City Public Works, 4407 East 60th Avenue, Adams County, Colorado (Event ID #300). January 18.
- Colorado Department of Public Health and Environment (CDPHE). 2005. Environmental Subsurface Investigation, Former ABC Truck Sales Property, 6001 Dexter Street, Commerce City, Colorado. July 25.
- Colorado Department of Public Health and Environment (CDPHE). 2014. No Further Actin Determination for Former Commerce City Dog Track Property, 6200 Dahlia Street, Commerce City, Colorado. April 22.
- Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division (HMWMD). 2022. Environmental records search. <https://www.colorado.gov/pacific/cdphe/hm-gis-data>. Last accessed August 3.
- Colorado Department of Transportation (CDOT), Environmental Programs Branch (EPB). 2018. Hazardous Materials Guidance. June.
- Colorado Division of Water Resources (CDWR). 2022. HydroBase mapping application. <https://www.coloradodnr.info/h5v/Index.html?viewer=dwrhydrobaseviewer>. Last accessed August 3.
- Colorado Oil and Gas Conservation Commission (COGCC). 2022. Review of online database. https://cogccmap.state.co.us/cogcc_gis_online/. Last accessed August 3.
- David Evans Associates, Inc. (DEA). 2022. Conceptual Layout and Draft Recommended Improvements, Vasquez Boulevard Transportation Improvements. January 18.
- Delta Environmental Consultants, Inc. 1996. Annual 1995 Monitoring Summary, Former Chevron Facility No. 7-0273, 5999 Dexter Street, Commerce City, Colorado. March 6.
- Environmental Protection Agency (EPA). 2011. Vasquez Boulevard and I-70 Operable Units Map, Denver County, Colorado. January 14.
- Environmental Protection Agency (EPA). 2022. Sixth Five-Year Review Report for Chemical Sales Co. Superfund Site, Denver County, Colorado. March 10.
- Environmental Resources Management (ERM). 1997a. Corrective Action Plan, 5901 Dexter Street Property, Commerce City, Colorado. May 19.
- Environmental Resources Management (ERM). 1997b. Closure Report, 5901 Dexter Street Property, Commerce City, Colorado. October 31.
- Environmental Risk information Services (ERIS). 2022a. Historical Aerials. Vasquez Blvd (I-270 to 64th Ave) Vasquez Blvd, Commerce City, CO. Order No. 22021100227. Photo dates: 1937, 1953, 1963, 1971, 1978, 1984, 1993, 1999, 2004, 2005, 2011, 2013, 2015, 2017, and 2019. February 15.
- Environmental Risk information Services (ERIS). 2022b. The EDR Radius Map Report™ with GeoCheck®. Vasquez Blvd (I-270 to 64th Ave) Vasquez Blvd, Commerce City, CO. Order No. 22020100260. February 2.
- Google Earth. 2022. Aerial photography. www.googleearth.com. Photo dates: 2/29/2009 and 5/26/2021. Last accessed August 3.

- Groundwater Technology Inc. 1990. Update for May and June, 1990, Chevron U.S.A., Inc. Service Station #7-0273, 5999 Dexter Street, Commerce City, Colorado. September 24.
- Harner Environmental Management, Inc. (Harner). 1999. No Further Action Request Report, Osmonics, 4545 East 60th Avenue, Commerce City, Colorado. February 3.
- Hillier, Donald E. and E. Carter Hutchinson. 1980. Depth to the Water Table, Colorado Springs – Castle Rock Area, Colorado. Denver: U.S. Geological Survey.
- James P Walsh & Associates Inc. (Walsh). 1989. Underground Storage Tank Removal. Tank Closure Report. September 22.
- Jehn Environmental, Inc. (Jehn). 1999. Corrective Action Plan, JRJ Properties, 5850 Dahlia Street, Commerce City, Colorado. February 12.
- Ken Meyer & Associates, Inc. 1990. Closure Report on UST Removals for Hast Lumber Company. June 19.
- Secor Environmental Engineering (Secor). 1994a. UST Removal Report, Conoco Food Mart No. 06360, 4981 East 64th Avenue, Commerce City, Colorado 80022. November 4.
- Secor Environmental Engineering (Secor). 1994b. Geoprobe Survey and Monitoring Well Installation, Conoco Food Mart No. 06360, 4981 East 64th Avenue, Commerce City, Colorado 80022. November 4.
- Secor Environmental Engineering (Secor). 1996. Quarterly Monitoring Report, Conoco Food Mart 06360, 4981 E. 64th Avenue, Commerce City, Colorado 80022. February 11.
- Slosky and Company, Inc. (Slosky). 1993. Site Characterization Report, NEW Development Company, 60th Avenue and Dexter, Commerce City, Colorado May 19.
- Slosky and Company, Inc. (Slosky). 2020. VCUP Application, Proposed Greyhound Flats, 6200 Dahlia Street, Commerce City, Colorado. May 28.
- The WCM Group, Inc. (WCM). 1989. Ward Transport, Inc. 5901 Dexter Street, Commerce City, Colorado. October 2.
- The WCM Group, Inc. (WCM). 1990. Ward Transport, Inc. L.U.S.T. Assessment. Commerce City, Colorado. May.
- Tri-County Health Department (TCHD). 2022. Historical Landfills Searchable Map. <http://www.tchd.org/455/Site-Assessments>. Last accessed August 23.
- Trimble, Donald E. and Michael N. Machette. 1979. Geological Map of the Colorado Springs-Castle Rock Area, Front Range Urban Corridor, Colorado. Denver: U.S. Geological Survey Map I-857-F.
- U.S. Geological Survey (USGS). Commerce City, CO Quadrangle, 1965, photorevised 1971, 1980, 1994, Orthophotographic Quadrangle, 2010, 2013, 2016, 2019, and 2022. Denver, CO.
- U.S. Geological Survey (USGS). Derby, CO Quadrangle, 1938, 1940, 1947, 1950, and 1957. Denver, CO.
- Walsh and Associates, Inc. (Walsh). 1991. Underground Storage Tank (UST) Closure Initial Site Characterization, City of Commerce City, 4407 East 60th Avenue, Commerce City, Colorado. October 23.
- Walsh and Associates, Inc. (Walsh). 1992a. Underground Storage Tank (UST) Closure Initial Site Characterization, City of Commerce City, 4407 East 60th Avenue, Commerce City, Colorado. July 16.

Walsh and Associates, Inc. (Walsh). 1992b. Underground Storage Tank Closure Report, 4407 East 60th Avenue, Commerce City, Colorado. September 1.

Walsh and Associates, Inc. (Walsh). 1999. Computer Ground Water Model in Support of Site Closure, City of Commerce City, 4407 East 60th Avenue, Commerce City, Colorado. May 21.

Appendix A Site Photographs

Phase I Environmental Site Assessment
Vasquez Boulevard Transportation
Improvements Photo Log
August 18, 2022



Photo 1 - The portion of the Project Area crossing the south portion of 5601 Dexter Street, facing west



Photo 2 - A concrete washout observed in the Project Area at 5901 Dexter Street

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Vasquez Boulevard Transportation
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Photo 3 - A stormwater detention pond in the Project Area at 5901 Dexter Street



Photo 4 - A portion of the Project Area crossing the south portion of 4500 East 60th Avenue, facing west

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Photo 5 - A portion of the Project Area crossing the south portion of 4500 East 60th Avenue, facing south



Photo 6 - The informal stormwater detention pond on the southwest portion of the Project Area

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Photo 7 - A portion of the Project Area crossing the south portion of 4500 East 60th Avenue, facing north



Photo 8 - A portion of the Project Area crossing the south portion of 4500 East 60th Avenue, facing east

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Photo 9 - Trash and dumpster on the portion of the Project Area at 4500 East 60th Avenue



Photo 10 - The Project Area along Clermont Street, facing south

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Vasquez Boulevard Transportation
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Photo 11 - The portion of the Project Area on the south side of 6290 Clermont Street, facing east



Photo 12 - The portion of the Project Area on the south side of 6290 Clermont Street, facing east

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Photo 13 - The portion of the Project Area on the south side of 6101 Dexter Street, facing west



Photo 14 - The southwest corner of East 60th Avenue and Dexter Street, facing east

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Vasquez Boulevard Transportation
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Photo 15 - The southwest corner of East 60th Avenue and Dexter Street, facing south



Photo 16 - The intersection of Vasquez Boulevard and East 60th Avenue, facing east

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Photo 17 - The intersection of Vasquez Boulevard and East 60th Avenue, facing southwest



Photo 18 - The northwest corner of East 60th Avenue and Dexter Street, facing west

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Photo 19 - The northwest corner of East 60th Avenue and Dexter Street, facing north



Photo 20 - East 60th Avenue facing west, toward Vasquez Boulevard

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Vasquez Boulevard Transportation
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Photo 21 - East 60th Avenue facing west from the east Project Area boundary



Photo 22 - The northeast corner of Vasquez Boulevard and East Parkway Drive

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Vasquez Boulevard Transportation
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August 18, 2022



Photo 23 - East Parkway Avenue facing southwest, toward Vasquez Boulevard



Photo 24 - Vasquez Boulevard facing south, toward the intersection with East 60th Avenue

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Photo 25 - Vasquez Boulevard facing north, toward the intersection with East 62nd Avenue



Photo 26 - Vasquez Boulevard facing south, toward the intersection with East 60th Avenue

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Photo 27 - Vasquez Boulevard facing north, toward the intersection with East 62nd Avenue



Photo 28 - The intersection of Vasquez Boulevard and East 62nd Avenue

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Photo 29 - East 62nd Avenue facing east from Vasquez Boulevard



Photo 30 - East 62nd Avenue facing west from the east Project Area boundary

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Vasquez Boulevard Transportation
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Photo 31 - Vasquez Boulevard facing north, toward east 64th Avenue



Photo 32 - The stormwater parcel on the north portion of the Project Area at East 69th Avenue

Appendix B Environmental Records