



NATIONAL INSPECTION SERVICES

Commercial and Environmental Due Diligence

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Materials Management Plan 230 South 5th Street, Grand Junction, Colorado

1.0 Summary of the Planned MMP Activities

National Inspection Services (NIS) has prepared this Materials Management Plan (MMP) on behalf of the Grand Junction Downtown Development Authority (Owner) and [REDACTED] for use during redevelopment activities at the former Greyhound Lines Inc. bus terminal facility located at 230 South 5th Street in Grand Junction, Colorado (Site). The Site was developed with a gasoline station from at least 1941 to 1955 and refueling and maintenance operations associated with the bus terminal existed from about 1980 to 2021. The Site has undergone environmental assessments, remediation, and has received three letters of No Further Action from the Colorado Division of Oil and Public Safety (OPS) due to petroleum releases from former underground storage tanks (USTs) associated with the former filling station and the Greyhound bus terminal as well as cleanups conducted by the Department of Energy (DOE) due to the historic use of uranium mill tailings as fill at the Site. The Site is currently vacant and proposed for redevelopment. The Site is located in the City of Grand Junction to the northeast of the intersection of Ute Avenue and S 5th Street (*Attachment 1, Figure 1*).

The proposed land use consists of the demolition of the current Site structures in order to redevelop the Site with an approximate 112,347 square foot, slab-on-grade, 6-story, mixed use residential and commercial complex that will extend to the lot lines. The ground level of the complex will include retail stores, restaurants, an art gallery, and a courtyard. Levels two through six will primarily be occupied by residential apartments.

Based on recent assessment activities conducted by NIS, the following known environmental conditions are present at the Site:

- Benzene concentrations in groundwater in areas of the Site are above the Colorado groundwater standard for benzene,
- The PAHs 1-methylnaphthalene and naphthalene were detected in subsurface soil samples at concentrations above the EPA Regional Screening Levels (RSLs) for residential and/or commercial land use,

- Elevated total petroleum hydrocarbon concentrations exist in subsurface soil and groundwater in areas of the Site due to past petroleum releases.

A detailed summary of environmental assessments conducted at the Site is included in the Colorado Department of Public Health and Safety (CDPHE) Voluntary Cleanup Program (VCUP) application for the Site. This MMP describes the procedures for the handling, transport, and disposal of environmentally-regulated materials reasonably expected to be encountered during construction activities at the Site based on previous environmental assessments and the VCUP application.

1.1 Site Background

The Site was improved with two dwellings and an outbuilding by 1886 and was occupied by a blacksmith, carpenter, stable, foundry, and a feed building prior to being redeveloped with the current on-site structure in 1937. From at least 1941 through 1955 a gasoline filling station was located on the southwest corner of the Site and was occupied by a bus depot with storage, repair and a restaurant. In 1941 and 1946 the Site was utilized as a bus terminal operated by Rio Grand Motor Way, Inc. and Terminal Service station gas and oil. The 1947 fire insurance map depicted two gas tanks on the southwest corner of the Site and the 1955 directories identify the Site as continental bus system and Wood's Corner Service gas station. From about 1960 through 1985 the Site was occupied by various transportation centers, garages and cafes and from 1991 through 2021 was occupied by Greyhound. Generally, the various transportations centers operated as a bus depot with maintenance and refueling until 2021.

The Site is located within southern Grand Junction, Mesa County, Colorado and is surrounded by commercial and residential development including parking lots, a police department, and retail stores, and a museum. The Site is bound to the north by an alley followed by All Copy Products at 503 Colorado Avenue and by a gravel-covered parking lot and an apartment building at 529 Colorado Avenue; to the east by a City-owned parking lot, to the south by Ute Avenue followed by the Grand Junction Police Department at 555 Ute Avenue, to the west by the Museum of Western Colorado at 462 Ute Avenue, and to the southwest by Whitman Park.

2.0 Purpose of the MMP

The purpose of this MMP is to provide comprehensive procedures for managing the removal, relocation, and/or disposal of materials that are reasonably expected to be encountered during the redevelopment of the Site due to its historic use as a filling station, bus terminal, and due to the potential presence of uranium mill tailings as fill. This MMP will be submitted to the CDPHE within the Voluntary Cleanup Plan (VCUP) to obtain regulatory concurrence on the principal methods for soil management during redevelopment of the Site prior to commencing the project. This MMP will be provided to contractors involved with the redevelopment to be reviewed as part of the Site orientation prior to commencing soil disturbing activities.

Based on the Site history, environmental concerns known to exist or have the potential to exist are discussed in this MMP and include the following:

- Petroleum-contaminated soils (PCS),
- Underground Storage Tanks (USTs),
- Uranium Mill Tailings,
- Soils containing hazardous chemicals related to automotive maintenance and repair, and
- Regulated Asbestos-Contaminated Soil (RACS) Waste

Section 6 describes the management of these materials. The following section provides a brief synopsis of the known environmental conditions on the Site.

3.0 Existing Environmental Conditions

The Site has historically undergone environmental assessments, remediation, and has received three letters of No Further Action from the Colorado Division of Oil and Public Safety (OPS) due to petroleum releases from former underground storage tanks (USTs) associated with the former filling station and Greyhound bus terminal. In addition, the United States Department of Energy (DOE) has performed cleanups of uranium mill tailings that were used as fill at the Site. The Site is currently vacant and proposed for redevelopment with a multi-use commercial/residential complex.

NIS performed environmental assessments in April and July of 2025 to assess data gaps and current contaminant concentrations in soil and groundwater at the Site. The results of the assessments are summarized below.

Soil

Subsurface soil at the Site generally consists of silts and clays of high plasticity with occasional sand stringers in the upper 18 to 20 feet. Gravelly fill is present at the locations of the former UST basins and soil vapor extraction system. Below the silts and clays is a fine, well-sorted, alluvial sand. Groundwater occurs at approximately 18 to 19 feet below ground surface (bgs) within this sand layer.

Stained soils with petroleum odors were noted in soil cores indicating petroleum releases. Indications of petroleum contamination were most commonly observed at the groundwater interface and occasionally in small sand stringers at higher elevations with the borings but were present throughout soil core above the groundwater interface in soil borings NMW-1, NMW-2, NMW-3, and NSB-9 along the northeastern, western, and southern portion of the exterior lot. PID measurements ranged from 0 to 712.8 parts per million (ppm) VOCs within the soil borings. Observations of petroleum contamination on the western and southern portions of the lot are most likely residual contamination from the former leaking USTs along with some minor surface spills. Petroleum impacts on the northeastern portion of the lot, as is seen in soil boring log NSB-9, suggest a significant spill may have occurred due to indications of petroleum contamination from approximately 1-foot bgs to the depth of the boring. In general, petroleum impacts in soils were typically observed within the water table zone at depths around 18 to 19 feet bgs, and soil samples were typically collected from impacted areas slightly above the water table elevation.

Benzene, toluene, ethylbenzene, and xylene (BTEX) analysis of soil samples associated with field indications of contamination (visual, olfactory, and elevated PID measurements) did not detect BTEX constituents above

the Environmental Protection Agency (EPA) Resident Soil Regional Screening Levels (RSLs) but reported elevated total petroleum hydrocarbon (TPH) concentrations from below the former western UST basin, around the easternmost UST basin, and at the northern portion of the exterior lot. The low or non-detect BTEX concentrations and elevated TPH concentrations suggest that the individual petroleum constituents have degraded considerably since the releases occurred, either through natural attenuation and/or the former soil vapor extraction system that operated at the Site. Detected results of VOCs and TPH in soil are summarized on *Attachment 1, Figure 2*.

Polycyclic aromatic hydrocarbon (PAH) results in soil samples associated with elevated TPH locations identified 1-methylnaphthalene above the EPA Resident Soil RSL at the northeast corner of the exterior lot at a depth of 15 feet below ground surface (bgs) and above the EPA Industrial Soil RSL on the western side of the easternmost UST basin. Additionally, naphthalene was detected above the EPA Resident RSL in the soil sample from the western side of the easternmost UST basin. Various other PAHs were detected in the soil samples analyzed at concentrations below the EPA Resident Soil and Industrial Soil RSLs. Detected results of PAHs in soil are summarized on *Attachment 1, Figure 3*.

Groundwater

Groundwater is present at the Site at depths ranging from approximately 18 to 20 feet bgs within a well-sorted fine sand. Groundwater generally flows to the west-southwest and groundwater production is very slow at the Site based on well purging observations.

Benzene was detected above the CDPHE Colorado Groundwater Standard (CGS), as defined in CDPHE Regulation No. 41 – The Basic Standards for Groundwater, 5 CCR 1002-41, for this constituent in the April groundwater samples collected from well NMW-1, located near the suspected spill area at the northeast portion of the exterior lot, and NMW-2, located on the downgradient side of the Site near the westernmost former UST basin. Benzene was detected at a lower concentration but still above the CGS at NMW-1 and was not detected in NMW-2 in the samples collected in July 2025. Other VOCs and PAHs were detected in Site monitoring wells at concentrations below their respective CGS. Detected results of VOCs and TPH in groundwater are summarized on *Attachment 1, Figure 4*, and detected results of PAHs in groundwater are summarized in *Attachment 1, Figure 5*.

4.0 Key Parties and Responsibilities

The Site is currently owned by the Grand Junction Downtown Development Authority [REDACTED]. It will be the responsibility of [REDACTED], and their contractors to provide personnel qualified to follow and implement this MMP including, but not limited to, material sampling, selection of analytical parameters, data evaluation, and decisions regarding final disposition of displaced material. The oversight personnel outlined in Section 4.1 below are recommended to be involved when all intrusive activities are conducted on the Property. Information for parties involved with the redevelopment of the Site and implementation of this MMP is provided below:

Owner: Grand Junction Colorado Downtown Development Authority
250 North 5th Street
Grand Junction, CO 81501

[REDACTED]
[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

4.1 Oversight Personnel

[REDACTED] will provide trained Oversight Personnel (OP) during the planned construction project. An OP will be present for all intrusive activities such as the installation of piers/caissons, the installation of utilities, and grading for the building foundation and slab. Once this initial construction has been accomplished, the OP will not perform oversight of follow-up, near-surface intrusive activities such as the installation of curbs and gutters, certain landscaping elements, and lighting unless the OP determines that such activities require oversight. The OP will also provide training to the excavation contractors on the correct implementation of the MMP (awareness training) and will be on call (prepared to be at the Site) if any environmental or unusual conditions are encountered during construction activities that do not require oversight. The intention of these activities by the OP is to ensure that environmental discoveries will be managed in accordance with this MMP. Qualifications for the OP include:

- Trained in proper sample collection methods and experience in identifying, characterizing, and managing regulated and hazardous waste;
- Completed the 40-hour Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) certification, and is current with eight-hour HAZWOPER refresher training;
- Be a Certified Asbestos Building Inspector (CABI) trained and certified in accordance with CDPHE Air Quality Control Commission (AQCC) Regulation 8 (5 CCR 1001-10, Part B) (CDPHE, 2008) and having a minimum of 40 verifiable hours of on the job "asbestos in soils" experience on a minimum of three different 'asbestos in soils' projects, conducted under either AQCC Regulation No. 8 or Section 5.5 of the Regulations Pertaining to Solid Waste Sites and Facilities

(6 CCR 1007-2, Part 1) (CDPHE, 2021). If a CABI is not present, the trained personnel may be a Qualified Project Monitor as defined by the Solid Waste Regulation, Section 5.5: Asbestos Contaminated Soil (6 CCR 1007-2 Part 1 - Regulation Pertaining to Solid Waste Sites and Facilities).

The OP's responsibilities include:

- Performing field screening of soils in adherence to this MMP;
- Completing necessary sample collection to characterize potential contaminants of concern;
- Completing daily logs, when on Site, thoroughly detailing Site activities;
- Tracking the types of wastes and contaminated soils encountered; and
- Verifying and documenting adherence to this MMP.

5.0 Surface Water Control

Depending on the planned area of disturbance, storm water permits and a Storm Water Management Plan (SWMP) may be required in accordance with the Colorado Discharge Permit System (CDPS) permit for storm water discharges associated with construction, and City of Grand Junction or Mesa County construction storm water permitting requirements prior to the initiation of surface disturbing activities. It is the responsibility of the Contractor to verify if the scope of the project requires storm water permits or development of a SWMP. Although not all projects will require a storm water permit or SWMP, the following guidelines and best management practices shall be followed during all surface, subsurface, and construction activities minimize cross-contamination by placing excavated wastes/soil on impermeable liners.

- Cover temporarily stockpiled materials with plastic sheeting or liner to prevent contact by precipitation;
- Establish run-on controls to divert storm water from contacting stockpiled waste materials or entering open excavations;
- Provide run-off controls to minimize the spread of contamination from stockpiled waste materials;
- Segregate potentially-impacted storm water from un-impacted storm water; and, characterize and properly dispose of storm water that has been contaminated with chemicals of concern (COCs) above regulatory standards.

In addition, the Contractor using the MMP should be aware of and implement the requirements of the Drainage and Erosion Control Report for the Site.

6.0 Materials Management During Intrusive Activities

Based on the Site history and environmental assessments, environmental concerns are known to exist or are reasonably expected to exist. As such, procedures that are germane to the protection of human health and the environment are required. The following procedures shall be followed by the contractors at the Site; these activities will be facilitated by the OP.

6.1 Construction Dewatering

Construction dewatering is not anticipated during the redevelopment of the Site based on the depth to groundwater (approximately 18 to 19 feet bgs) and the slab-on-grade construction of the building. Groundwater may be generated if caissons are installed for support of the building. Generated groundwater will be containerized and sampled for the following analyses:

- VOCs by EPA Method 8260
- Resource Conservation and Recovery Act (RCRA) 8 total metals by EPA Methods 6010/7471
- Flashpoint by ASTM D93 or equivalent

Results of the containerized groundwater analyses will be evaluated to determine the most appropriate management considering the volume of water, which may include landfill disposal, treatment, or land application.

6.2 Fugitive Dust

Fugitive dust generation is expected to be minimal during redevelopment due to the minimal removal of soil during Site redevelopment activities. The Contractor will be responsible for controlling dust and particulate matter originating from winds, vehicular traffic, and operational equipment. Chemical dust suppressants, water or both may be used as appropriate to minimize the amount of dust generated and to maintain visible fugitive dust levels below 20% opacity in compliance with 5 CCR 1001-3, AQCC Regulations (CDPHE, 2012B). Dust control practices that may be used to control air emissions and provide dust suppression at the Site include the following:

- Cover inactive exposed faces of material with geomembrane or soil,
- Seal the exposed soil by moisture conditioning and compacting,
- Minimize the distance soil will be moved in connection with excavation and loading,
- Minimize drop heights when dumping or transferring materials,
- Treat surfaces with water spray, foam spray, hydro-mulch spray, or crusting agents,
- Reduce vehicle speeds, and
- Install additional fencing or other engineering controls to block wind.

Earth moving activities will be suspended during high wind events, defined as sustained winds of forty miles per hour (40 MPH) or greater, or gusts of fifty-five miles per hour (55 MPH) or greater, expected to persist for one hour or longer, as defined by the National Weather Service. When the conditions meet any of the shutdown requirements, the Order for shutdown will be executed. Earth moving activities may resume as criteria are met. Under Colorado air quality regulations, land development refers to all land clearing activities, including but not limited to land preparation such as excavating or grading for residential, commercial, or industrial development or O&G exploration and production. Land development activities release fugitive dust, a pollutant regulated by the Air Pollution Control Division at CDPHE.

Small land development activities (land development activities that are less than 25 contiguous acres and less than 6 months in duration) are not subject to the same reporting and permitting requirements as large land development activities and do not need to report air emissions to the CDPHE Air Pollution Control Division. For these projects, operators must use appropriate control measures to minimize the release of fugitive dust from the Site (CDPHE, 2014B).

6.3 Air Monitoring

Real-time air quality monitoring with a portable photo-ionization detector (PID) during the intrusive activity will provide important air quality information to determine if COCs are present at harmful concentrations in the work area. Action levels for concentrations of total VOCs within the work area are provided by the contractor's Health & Safety Plan (HASP). The results of air monitoring should be evaluated to assess if the Personal Protective Equipment (PPE) worn by site workers is adequate to prevent exposures to COCs.

6.4 Soil Excavation

Soil excavation will consist primarily of site grading, utility excavations, installation of caissons for structural support, and excavation of petroleum contamination on the northern portion of the Site. Site grading will occur during redevelopment to the Site boundaries at relatively shallow depths. Protocols for managing environmental contaminants located in the excavated soil are described below.

6.4.1 Uranium Mill Tailings

Based on available historic documentation, uranium mill tailings may be present below the existing building and hardscape. The CDPHE Uranium Mill Tailings Remedial Action (UMTRA) program manages uranium mill tailings in the area on a regular basis and will accept uranium mill tailings for free at the Grand Junction City Yard. The City Yard is unable to accept uranium mill tailings with indications of petroleum contamination, based on visual or olfactory observations, but does allow for containerized petroleum-impacted uranium mill tailings to be stored at the City Yard and land farmed until the petroleum has volatilized from the mill tailings. The action level used by CDPHE for determining whether the UMT requires special handling is 20 μ Rem/hr.

Prior to building demolition, the CDPHE Grand Junction UMTRA Program will be contacted using the on-line form located at:

<https://fs20.formsite.com/HMWMD/UMTRA-request/index.html>

A copy of the form is included as *Attachment 2*.

A representative of the UMTRA Program will come to the Site and conduct a radiation survey using a scintillometer to identify areas of concern in both Site soil and building materials. Based on the historic reports, we expect that the current Site building was constructed on top of UMT and that the building materials have a low likelihood of being impacted by UMT. The representative will return to the Site to verify that the UMT has been fully removed or to assist during the process, if needed.

Uranium mill tailings encountered at the Site will be segregated as follows:

- Uranium mill tailings above the 20 μ Rem/hr action level,
- Uranium mill tailings above the 20 μ Rem/hr action level and impacted with petroleum hydrocarbons, and
- Uranium mill tailings below the 20 μ Rem/hr action level.

These three waste streams are discussed in the following sections.

6.4.1.1 Uranium Mill Tailings Above the 20 μ Rem/hr Action Level

UMT not exhibiting petroleum impacts will be removed from the Site and taken to the City Yard located at 333 West Avenue in Grand Junction, Colorado. The City Yard does not require a waste profile or manifests for disposal of the UMT.

6.4.1.2 Uranium Mill Tailings Above the 20 μ Rem/hr Action Level and Impacted with Petroleum Hydrocarbons

UMT exhibiting petroleum impacts will be removed from the Site and taken to the City Yard for treatment via land farming. The UMT will be stored at the City Yard in a metal watering trough and mixed to allow for the volatilization of the VOCs within the UMT. This process may take time and, if petroleum impacts persist over a certain amount of time, the UMT will be returned.

6.4.1.3 Uranium Mill Tailings Below the 20 μ Rem/hr Action Level

UMT below the 20 μ Rem/hr action level may remain on Site or transported off-Site for disposal or reuse. Some local contractors may accept the UMT at concentrations below the action level for reuse on projects. A list of local contractors that may accept the material is included in *Attachment 2*. UMT below the action level but classified as PCS will be managed in accordance with Section 6.4.2, Petroleum-Contaminated Soil.

6.4.2 Petroleum-Contaminated Soil

Based on environmental investigations at the Site, petroleum-contaminated soil (PCS) is present due to leaking USTs which have been removed. Identification of PCS during construction activities will be determined through field screening (staining, odors and/or elevated PID readings). PCS will be tested,

profiled and managed for disposal as a special waste at Mesa County Landfill or other Subtitle D disposal facility capable of accepting the material.

One composite soil sample will be collected from every 100 cubic yards or less of excavated soil for the following disposal characterization analyses:

- RCRA 8 Metals by the Toxicity Characteristic Leaching Procedure (TCLP) analysis,
- Total BTEX and TVPH by EPA Method 8260, and
- TEPH by EPA Method 8015

A full VOC list will be required at the Mesa County landfill for TVPH concentrations above 500 mg/kg, and a full SVOC analysis will be required for TEPH concentrations above 500 mg/kg.

PCS shall be managed in accordance with the CDPHE *Regulations Pertaining to Solid Waste Sites and Facilities* (6 CCR 1007-2, Part 1). These regulations allow PCS to be managed by several methods including:

- Disposal at an approved landfill,
- Recycling by incorporation into an asphalt batch plant or thermal treatment,
- On-site treatment and reuse, or
- Off-site reuse.

Site-specific guidance for incorporation into an asphalt batch plant, thermal treatment, or other proposed management methods may be received by contacting the CDPHE Hazardous Materials and Waste Management Division.

6.5 Underground Storage Tanks

Underground storage tanks (USTs) are potentially located at and in the vicinity of the Site based on the historical use of the Site as a filling station and a bus terminal. USTs regulated by the Colorado Department of Labor and Employment, Oil and Public Safety (OPS) are not present at the Site, and the historical use and contents of potential USTs that may be located during soil disturbing activities is unknown. Due to the unknown contents of USTs identified at or in the vicinity of the Site, UST contents will be characterized using the following analyses:

- VOCs by EPA Method 8260,
- RCRA 8 metals-TCLP by EPA Method 6010, and
- PCBs by EPA Method 8082

If encountered, USTs will be removed in accordance with the OPS Storage Tank Regulations (7 C.C.R. 1101-14). If analysis of the UST contents indicates that the contents include a hazardous waste, waste will be handled in accordance with the CDPHE Hazardous Waste Regulations (6 CCR 1007-3) as defined in Section 6.6.

6.6 Hazardous Waste

Hazardous waste has not been identified at the Site. If suspect hazardous waste is identified during intrusive activities, the project manager will be notified immediately. If a determination is made that the waste may be hazardous, the hazardous waste will be segregated, overpacked, and staged in a secure location on-Site, unless deemed unsafe to do so.

Following staging of the waste, a characterization and management plan must be submitted to CDPHE for approval. The characterization and management plan shall provide a description of the waste and clarify the type and frequency of representative characterization samples to be collected, the estimated volume of material present, and other pertinent information for determining proper handling of the waste. Hazardous wastes will be characterized, profiled, and transported off-site to a licensed Subtitle C facility. In Colorado, the Clean Harbors Deer Trail Hazardous Waste Facility near Last Chance, Colorado accepts certain types of hazardous wastes. *Attachment 3, Table 1* provides details for the packaging, transportation, and disposal of waste streams. Hazard categorization (hazcat) kits may be used to pre-screen waste for hazardous characteristics. The type of hazcat kit, standard operating procedures, and qualifications of personnel using the kit must first be approved through the CDPHE project manager prior to use.

Solid wastes are considered nonhazardous unless they exhibit a hazardous "characteristic" (toxicity, reactivity, ignitability, or corrosivity) or have been specifically listed as hazardous waste by the EPA (known as a "listed waste"), as provided in *Attachment 3, Table 2*. Regulatory criteria for hazardous waste based on TCLP concentrations are detailed in *Attachment 3, Table 3*. Listed wastes are specific wastes, or are mixtures or wastes derived from those listed wastes. These materials may be from nonspecific sources such as spent solvents or may be wastes from specific sources or wastes from discarded chemical products.

If hazardous wastes are discovered at the Site, these materials will be packaged, manifested, characterized, transported, and disposed of in compliance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/RCRA and DOT regulations. All hazardous waste shipped from the Site must be packaged in accordance with DOT regulations per 49 CFR Part 173, 49 CFR Part 178 (DOT, 2015), 49 CFR Part 179 (DOT, 2011), and 6 CCR 1007-3, Sections 262.30 through 262.33 (CDPHE, 2016B); hazardous waste accumulation containers will be labeled as "Hazardous Waste." Regulations concerning hazardous waste containers are provided in 6 CCR 1007-3, Section 265 Subpart I. In accordance with 6 CCR 1007-3, Section 262, hazardous waste manifests must note the USEPA ID number of the generator, all transporters of the waste, and the ultimate disposal facility.

Regulations require generators to test the waste, or use process knowledge of the waste, to determine if the waste is restricted from land disposal, and certify that the wastes meet the treatment standards described in 6 CCR 1007-3, Section 268, Subpart D. RCRA-permitted hazardous waste disposal facilities located in the region include:

- Clean Harbors Environmental Services, Inc. Incinerator in Kimball, Nebraska (308-235-4012)
– This hazardous waste storage and treatment facility includes a thermal oxidation incinerator and an on-site incinerator ash monofill.
- Clean Harbors Deer Trail, LLC, (also known as, Highway 36 Landfill). Adams County, Colorado (970-386-2293) -This hazardous waste treatment, storage, and disposal facility has container storage, tank storage, a treatment building, and seven double-lined disposal cells.

6.7 Regulated Asbestos-Contaminated Soil

Regulated asbestos-contaminated soil (RACS) has not been identified at the Site. If identified, a “Notification of regulated asbestos contaminated soil (RACS) disturbance” form will be submitted to CDPHE within 24 hours of RACS confirmation to:

Briant.long@state.co.us

RACS management should be handled in accordance with Section 5.5.7 of the CDPHE Regulations Pertaining to Solid Waste Sites and Facilities (6 CCR 1007-2, Part 1).

6.8 Equipment Decontamination

Prior to demobilization from the Site, equipment used for intrusive activities and material handling of impacted soil will be decontaminated at a decontamination area constructed by the Contractor. Decontamination will be conducted in accordance with the contractor’s decontamination plan for the Site. At a minimum, the decontamination plan or procedures should address the following:

- Methods to minimize the spread of contamination,
- Types of decontamination wastes and affected equipment,
- Decontamination station locations and supplies used,
- Methods for collecting, containing, characterizing, and disposing of decontamination wastes, and
- PPE worn by workers

7.0 Summary and Conclusions

This MMP has been developed to detail procedures to be followed for managing environmental conditions that may be encountered during redevelopment of the Site. It is expected that the majority of environmental conditions will be associated with the removal of petroleum impacted soils from the Site during site grading, soil excavation, and the installation of caissons as part of the building structural support. This MMP requires that environmental oversight and testing be implemented during the intrusive activities at the Site, and that environmentally impacted media be managed and disposed of in accordance with the applicable regulations and industry practices. [REDACTED], and their subcontractors, will provide the necessary efforts and personnel to fully implement this MMP.

If you have any questions or concerns, please contact us at (970) 482-1976 or noah@nationalinspection.net.
Sincerely,



Noah M. D'Antonio, President
National Inspection Services

Attachments:

Attachment 1 – Figures

- Figure 1 – Site Location
- Figure 2 – VOC and TPH Soil Sample Results
- Figure 3 – PAH Soil Sample Results
- Figure 4 – VOC and TPH Groundwater Sample Results
- Figure 5 – Groundwater PAH Sample Results

Attachment 2 – Uranium Mill Tailings Information Request Form and Contractor List

Attachment 3 – Tables

- Table 1 – Regulatory and Waste Profiling Requirements for Waste Categories
- Table 2 – Listed and Characteristic Hazardous Wastes
- Table 3 – TCLP Regulatory Concentrations for Hazardous Waste

ATTACHMENT 1

FIGURES

ATTACHMENT 2

**URANIUM MILL TAILINGS INFORMATION REQUEST FORM AND
CONTRACTOR LIST**

ATTACHMENT 3

TABLES