

Memorandum

To: Dania Zinner, EPA RPM, VB/I70 Superfund Site

From: Timothy C. Shangraw

Date: December 31, 2015

Re: **POLREP #6 - Vasquez Boulevard/Interstate 70 (VB/I70) Superfund Site, Operable Unit 2, Removal Action**

On behalf of the City and County of Denver (Respondent), Engineering Management Support, Inc. is submitting this Pollution Report (POLREP #6) in accordance with Section 4.c of Appendix C to the Administrative Settlement Agreement and Order on Consent for Removal Action, for the subject Superfund Site (the Site). This report follows the outline detailed in Section 4.c of Appendix C, and contains pertinent new information specified in the Superfund Removal Procedures, Removal Response Reporting: POLREP and OSC Reports (EPA, 1994).

Section 1 – Heading

The date, site name, report author, report recipient, and report number are presented above.

Section II – Response Information

The reporting period extended from December 1 to December 31, 2015. During the reporting period a *Pre-Final Design Report* (EMSI, December 17, 2015) was prepared and submitted to EPA on December 17, 2015. Appendices to the *Pre-Final Design Report* included, but were not limited to:

- A revised pre-Final Materials Management Plan;
- The Final Methane, Odor, and Dust Control Plan;
- Two groundwater dewatering modeling reports;
- CDPHE WQCD surface water discharge permits;
- Construction Drawings;
- Construction Specifications; and
- A Construction QA Plan for the Geosynthetics Liner System.

CDPHE and EPA comments on the *Draft Design Report*, pre-Final Materials Management Plan (MMP), draft Methane, Odor, and Dust Control Plan (MODCP), and Construction QA Plan outline were incorporated into the *Pre-Final Design Report*. On December 10th and 22nd, Respondent received additional comments from CDPHE on the draft MODCP and pre-Final MMP, respectively. Those additional comments are being reviewed internally, and will be need to be discussed with CDPHE to resolve them. When resolved, the two plans will be updated.

Memorandum
POLREP #6
VB/I70, OU2 removal Action
December 31, 2015
Page 2

Section III – Issues, Resolutions, and Planned Activities

As stated above, the additional comments received from CDPHE on the pre-Final MMP and draft MODCP need to be resolved before these two documents can be finalized. Respondent proposes a work-group meeting with CDPHE in early January to address the comments.

Treatability studies on groundwater anticipated to be dewatered during GLOP construction are indicating that ammonia and sulfide removals to permitted discharge limits may require some form of advanced treatment beyond conventional break-point chlorination. Additional treatment processes such as biological nitrification/denitrification, advanced oxidation, and air stripping at high pH are being evaluated. In addition, removal of chloride and possibly sulfate to South Platte River discharge limits may require use of reverse osmosis. Application of reverse osmosis as an effluent polishing process continues to be evaluated.

Activities planned for the next reporting period consist of:

- Resolution of CDPHE comments on the pre-Final MMP and draft MODCP (early January 2016);
- Resolution of EPA and CDPHE comments on the *Pre-Final Design Report* and preparation of the *Final Design Report* (mid-January 2016);
- Resolution of EPA comments on, and finalization of, the *Quality Management Plan* (mid-January); and
- Continued assessment of treatment technologies for dewatering water (January-February 2016).

Please call Lisa Farrell (720.865.5439) or me (303.940.3426 x 9) if you have any questions.