On behalf of the City and County of Denver (Respondent), Engineering Management Support, Inc. (EMSI) is submitting this Pollution Report (POLREP #39) 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 On-Scene Coordinator (OSC) Reports (EPA, 1994).

Section I – Headings

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

Section II – Response Information

This reporting period extended from September 1 through 31, 2018 during which time punch-list items from the Pre-Final Inspection were addressed and components of the Construction Completion Report (CCR) were assembled.

Section III – Issues, Resolutions, and Planned Activities

Pre-Final Inspection punch-list issues identified by EPA during the Pre-Final Inspection are listed below, followed by the Respondent’s resolutions.

- Barrier system installation:

  Issue: The construction quality assurance reports need to be reviewed and approved by EPA.

  Resolution: A conference call was held with EPA on September 6, 2018 to discuss EPA’s comments on the electrical leak location survey reports for both the April and July surveys. Following that conversation, EPA approved the May electrical leak location report. The July report was revised and resubmitted to EPA on September 10, 2018 for review. Respondent awaits EPA’s review and approval of the July report.
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- Water Treatment Plant Permit Compliance:
  
  **Issue:** EPA’s Enforcement and Compliance History Online (ECHO) report indicates the McDonald Farms Enterprises, Inc. facility was in violation since October 2016.

  **Resolution:** All violations have been addressed and the ECHO report is being updated to document the facility is in compliance.

- Waste manifests:

  **Issue:** Non-hazardous waste manifests have incomplete information.

  **Resolution:** On July 18, 2018, a Corrective Action Report (CAR) listing the causes and solutions for the incomplete information was issued by Kiewit. Following issuance of the CAR, the Respondent and EMSI independently verified proper completion of waste manifests. Documentation of this Quality Assurance (QA) step was provided in QA Audit Report #16 that was attached to last month’s POLREP. The CAR will be appended to the CCR and reference to the QA Audit Report will be provided in Section 5 (Final Inspection and Certifications) of the CCR.

- Operations and Maintenance Plan:

  **Issue:** EPA is reviewing the draft Globeville Landing Outfall Environmental Monitoring and Maintenance Plan (GLOEMMP).

  **Resolution:** The GLOEMMP was prepared by the Respondent to address Post-Removal Site Control as outlined in Section 27 of the Administrative Order on Consent. Respondent awaits EPA’s review of the draft GLOEMMP.

Planned activities for the next reporting period consist of finalizing resolution of the punch-list items noted above, and preparation and submittal of the draft CCR to EPA for review and comment.