

# STATE OF COLORADO

Bill Owens, Governor  
Jane E. Norton, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

**HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION**  
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**Colorado Department  
of Public Health  
and Environment**

April 2, 2001

Mr. Mark Ashton  
RPM, Environmental Restoration Branch  
HQ Air Force Space Command  
Peterson Air Force Base  
Colorado Springs, CO 80914-2420

Re: Quebec Street Gate Funding

Dear Mr. Ashton:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed your request to defer the characterization, and if necessary remediation work planned for the "Quebec Street Gate" (QSG) project at Lowry AFB. The Division understands that future work at the QSG Project would be deferred in order to transfer funds to Buckley to support the Site 10 Remediation effort. As indicated in your electronic correspondence dated January 17, 2001, \$320,000.00 was allocated for work described under the "Preliminary Assessment/Site Investigation Report for Cantonment Area I (specifically the QSG Area) and Building 404 Oil/Water Separators", (the Report) July, 2000. The Division understands that funding for remediation of the Building 404 OW Separators will now be covered under BRAC, and that the anticipated cost for characterization work at the QSG project is estimated at 10 thousand dollars.

Details of the QSG characterization to date are described in the Report. The Report indicates that contaminated soil was uncovered in the vicinity of the QSG with TPH and volatile contaminants. Installation and subsequent monitoring of a temporary groundwater well located down gradient from the observed contamination indicated minor contaminant concentrations in the groundwater. Based on the information collected to date, the QSG Area does not appear to represent a immediate threat to human health and the environment. However, until the actual vertical and horizontal extent of the contamination has been determined, the threat to human health and the environment can not be evaluated in its entirety. Since the cost for characterization of this area is estimated to be less than \$15,000.00, the area should be characterized as soon as possible with the existing funding. If the characterization effort determines that an immediate threat to human health and the environment does not exist, then remediation work for the area may be completed at a later date as you have proposed. Please provide a copy of the analytical results for the temporary groundwater well sample that was collected.

The Report also describes assessment work that has been completed at other various structures within Cantonment Area 1 at the former Lowry Air Force Base in Denver. The Division believes that additional investigation work is required to assess the OW Separators at Building 409 located in Cantonment Area 1, and is concerned that if funding for this project is completely transferred to Buckley, then the additional work at Building 409 will not be completed appropriately. The Division has reviewed the Report, and does not agree with the findings and conclusions reached in the report regarding assessment of the OW Separators at Building 409. In fact, the Division never agreed with the sampling strategy used for the Building 404 and 409 OWSs. The discovery of significant contamination during recent excavation of the Building 404 OWSs indicates that the sampling strategy used for the Building 404 OWSs was inadequate because it did not provide reliable or useful data. The Division believes that the 409 Separators must be assessed in a more appropriate manner.

In order to grant concurrence with deferring remediation work at the QSG project, the Division is therefore requesting that the QSG Area be characterized with the available funding as soon as possible. In addition, the AF should commit to CDPHE in writing that the OWS at building 409 will be closed in accordance with Subpart G, to part 265 of the Colorado Hazardous Waste Regulations when they are decommissioned. If the contamination at the QSG area does not pose a significant and immediate threat to human health and the environment, then the remaining funding, estimated at \$310,000.00, should be transferred to Buckley. Any necessary remedial work should then be completed by FY03 or FY04 depending on the nature and extent of contamination and its threat or potential threat to human health and the environment.

If you have any questions regarding this correspondence or would like to arrange a meeting to discuss these comments and questions, please contact Doug Knappe at 692-3414.

Sincerely,



Jeff Edson  
Manager

Remediation and Restoration Unit  
Federal Facilities Program

cc: Sheila Gaston, CDPHE  
Mark Kadnuck, CDPHE  
Monica Sheets, AGO