



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8P-P3T

Allan G. Steckelberg, Project Manager
ARCADIS
630 Plaza Drive, Suite 100
Highlands Ranch, Colorado 80129

Re: Former Hamilton Sundstrand Denver Facility, Risk-Based Cleanup
Application, November 16, 2010

Dear Mr. Steckelberg:

EPA has reviewed the subject Application and grants a 40 Code of Federal Regulations (CFR) Part 761.61(c) *Risk-based disposal approval* for cleanup and disposal of PCB contaminated soils at the Area of Concern (AOC) 2, in the Facility Parcel at the former Hamilton Sundstrand Facility, located at 2480 West 70th Avenue, Adams County, Colorado, subject to the conditions outlined in the application dated November 16, 2010. ARCADIS shall submit a short completion report to EPA confirming cleanup and demonstrating compliance with this Approval and the PCB regulations at 40 CFR Part 761 when the cleanup and disposal have been completed.

The PCB cleanup and disposal at the Hamilton Sundstrand Facility should have been performed under a Toxic Substances Control Act (TSCA) approval granted by EPA under the TSCA Polychlorinated biphenyls (PCB) regulations. However, cleanup and disposal of PCBs had been begun or performed, without TSCA involvement, under the guidance of the Colorado Department of Public Health and Environment (CDPHE) with the exception of AOC 2, which is addressed in this approval.

Regarding AOC 2, and the Facility Parcel, EPA has evaluated and accepts the ARCADIS established Health Based Risk Goal (HBRG) of ≤ 0.83 mg/kg total PCBs for soil 0 to 2 feet below ground surface and ≤ 10 mg/kg total PCBs for soil 2 to 8 feet below ground surface in the Corrective Measures Workplan (January 2008), both approved by the CDPHE. Further, EPA has concluded that the HBRG of ≤ 0.83 mg/kg total PCBs in combination with placement of the bio-barrier, as specified in the application, will be protective of ecological receptors. Regarding Item 3.7, EPA has evaluated and accepts the Landmark Environmental Inc., established human health cancer risk-derived Risk Based Concentrations (RBCs) of ≤ 9.6 mg/kg for material used as subsurface fill 2 to 10 feet below ground surface (bgs) in the Final Selective Environmental Demolition Plan (December 28, 2007).

EPA concludes the following cleanup issues have been addressed sufficiently to protect

human health and the environment:

- 3.1 SVE System Knockout Tank Evaluation
- 3.2 Distribution and Stability of NAPL
- 3.3 Groundwater Sampling for PCB Analysis
- 3.4 Groundwater Treatment System Influent Evaluation
- 3.5 Evaluation of Soil beneath Excavated Tanks and Sumps
- 3.6 Building Demolition Cleanup Confirmation
- 3.7 Crushed Concrete Evaluation: Crushed concrete containing PCB concentrations of ≤ 9.6 mg/kg are disposed of on site as back-fill in deep basement excavations and covered with 2 feet of fill material.

Disposal: PCB wastes from the Facility Parcel, that were removed and disposed by BPI Westminster and their contractor, Recycled Materials, prior to EPA TSCA involvement, were disposed at the Clean Harbors Grassy Mountain Facility, Aragonite, Utah, if the PCB concentration was ≥ 50 mg/kg PCB. If the wastes contained PCBs at < 50 mg/kg and > 9.6 mg/kg, they were disposed at the Allied Waste Landfill, Commerce City, Colorado.

PCB wastes from the Facility Parcel that were removed and disposed by ARCADIS prior to EPA TSCA involvement, at PCB concentrations ≤ 14 mg/kg, were disposed at the Denver Arapahoe Disposal Site (DADS), Aurora, Colorado.

Immobilized PCBs in the LNAPL will remain below the Main Source Area.

Wastes from AOC 2 shall be disposed in accordance with the conditions outlined in the Application.

If you have questions or need further information, please contact Dan W. Bench of my staff at 303 312-6027.

Sincerely,

Stephen S. Tuber
Assistant Regional Administrator
Office of Partnerships and Regulatory Assistance