Project Area and Plan for Revitalization

Target Area and Brownfields – Background and Description of Target Area

In the heart of Huerfano County is the intersection of US Highway 160 and Interstate 25 Business Loop. At this intersection, over 3 million cars pass each year on their way to and from places like Mesa Verde, Great Sand Dunes National Park, and places up and down the Front Range Corridor. Approximately one block west of this intersection are the properties addressed as 123 through 129 East 7th Street and 135 East 7th Street. These parcels are the locations of a former Dry Cleaner and the current rubble of what was once the Old Hospital, which serve as stark reminders of the past and the history of a different time in Huerfano County, as well as the current blight.

Historically, Huerfano County was known for its coal mining industry. In 1879, Colorado Fuel and Iron introduced coal mining to the County along with numerous other companies that mined coal over the decades. At the turn of the 20th century, over 15,000 men were employed by the coal camps, with the mid-1920s being the peak years for Huerfano County coal production. In 1926, Huerfano County produced one-fifth of Colorado's coal. Those days are far gone as the County's population has decreased from 17,062 in 1930 to 6,946 in 2023[1]and struggles to find a new economic foundation.

Currently, the population base is comprised of 64.4% white and 30.3% Hispanic, with 6.3% in other classified groups, according to the Colorado State Demographer[2]. This diverse ethnic population is a significant strength to our culture and vitality.

These sites, along with others, are preventing investment in the City of Walsenburg and the County. The population loss, economic decline, and resulting excess of brownfields have led to one of the highest poverty rates in Colorado, at 17.5%, which is nearly double the Colorado poverty rate, according to censusreporter.org, and a median household income of $52,139, according to Data USA[3]. These factors make the economic challenges in this County immense. According to the Department of Human Services in Huerfano County, 1,800 residents depend on SNAP benefits. To tackle these economic needs and blight, Huerfano County received an FY22 US Environmental Protection Agency (USEPA) Brownfield Community-wide Assessment Grant. This program has been instrumental in laying the groundwork for revitalization projects within the County. Revitalizing the vacant and neglected former Dry Cleaner and Old Hospital is a linchpin in the County's economic redevelopment plan. A USEPA Brownfield Cleanup Grant will

1

2

3

abate hazardous materials at the Old Hospital and clean up groundwater at the former Dry Cleaner, paving the way for reuse.

Description of the Brownfield Site:

The Old Hospital (135 West 7th Street) and its history represent a similar story to the County. First developed in 1890, it was later expanded in 1919 by Dr. Lamme to include 15 beds for patients and a private residence. It expanded to 80 beds in 1924 to serve the employees of the coal mining industry. Throughout the years, it survived until 1960 when the owners raised the rent, and the hospital was closed. It was later turned into the Walsenburg Care Center and provided nursing home services for the County until March 2011. After that, it became an antique mall. In 2021, the building and private residence were sold to a private individual. Most portions of the Old Hospital were involved in a major fire in October 2023. Since the fire, the Old Hospital at 135 W. 7th Street. has been fenced off, but remains a major eyesore, a detriment to the quality of life, and presents an environmental hazard to the City of Walsenburg, a block away from the busiest intersection in the County.

Sitting adjacent to the Old Hospital is a vacant building once occupied by a former Dry Cleaner. The building was constructed in the 1900s, and was occupied by the Model Tailor Dry Cleaners at 127 W. 7th Street from 1948 to the early 1990s. The dry cleaner building has remained generally unused since the departure of the latest tenant in 2009. Historical dry cleaning operations have led to the release of solvents into groundwater over time.

With the USEPA's help, the County will transform these eyesores and help revitalize the downtown corridor of Walsenburg. The plan for revitalization is to utilize grant funding for the cleanup of building materials associated with the Old Hospital that were burned during the fire and contain asbestos, as well as complete asbestos abatement of the building materials not impacted by the fire. Additionally, the plan includes demolishing the buildings. The grant funding would also be used to demolish the Dry Cleaner building and initiate the cleanup of the groundwater, which has shown contamination levels for trichloroethene ranging from 4.3 micrograms per liter (µg/L) to 420 µg/L from 2019 to 2025. Clearing the property and preparing it for redevelopment will attract new investment, help create jobs, and remove the environmental contamination that presents a significant health risk to surrounding residents. The quantities and building components containing asbestos to be abated using the USEPA Brownfields Cleanup Grant and summarized in the table below.

Contaminant	Estimated Quantity	Building Material or Media
Asbestos	29,352 square feet (sq. ft.) 220 linear feet	Wall texture, insulation, drywall system, sheet flooring, roofing materials
Chlorinated ethenes	4,400 sg. ft.	On-site groundwater

Revitalization of The Target Area – Reuse Strategy and Alignment with Revitalization Plans

The current plan for the redevelopment of the site includes the construction of retail/commercial units fronting West 7th Street, as well as a two-story parking garage situated behind the first-floor retail space.

Huerfano County is and has been strongly committed to revitalizing the downtown area of Walsenburg. In transforming the Od Hospital and the former Dry Cleaner properties on 7th and Albert Streets into a hub of activity through the redevelopment of storefronts facing 7th Street and parking. This initiative aligns with the goals of the Urban Renewal Area and the City of Walsenburg to attract additional storefront opportunities for both locals and tourists. This will enhance property and sales tax revenues for the area, thereby improving opportunities for enhanced services throughout the entire downtown corridor. The improved parking and storefronts, which will include a commissary kitchen to support a significant cottage food industry, as well as service and retail outlets. The storefronts will be designed to attract a variety of businesses with security and portable walls to accommodate different retail and business size needs. The enterprise will be managed by Huerfano County Economic Development and tie into existing programs. The County operates the Wheelhouse Popup Market, which was developed to support established, new, and emerging businesses with startup, launch, tools, equipment, and growth strategies and skills to boost economic growth in Huerfano County. Currently, the program offers space for training, coaching, and networking, building a community of innovation, and supporting the launch, growth, and longevity of local businesses. This project will remove significant blight and environmental damage, creating a vital and appealing site for the City to spur additional investment in downtown. This initiative will coincide with the Urban Renewal Authority's efforts for façade improvements and other enhancements in the downtown area.

Outcomes and Benefits of Reuse Strategy

The cleanup and reopening of the storefronts will create jobs, generate tax revenue, and draw visitors and shoppers to the area. The parking garage will provide better access to downtown Walsenburg and increase the opportunity for tourists from throughout Colorado and beyond to stop and enjoy the area.

Strategies for Leveraging Resources – Resources Needed for Site Reuse

The County is proposing to enter the project into the Colorado Department of Public Health and Environment (CDPHE) Voluntary Cleanup Program, which offers tax credits that the County will consider utilizing or selling as part of the redevelopment. Additionally, the primary census tract in Walsenburg is a Federal Opportunity Zone, which could attract investors to the reuse of the

site. Huerfano County is an Enhanced Enterprise Zone, which provides employers with significant tax incentives and will be used to promote revitalization uses.

Huerfano County will promote uses and funding opportunities to the Office of Economic Development and Technology, as well as the Division of Local Government, for funding and support.

Huerfano County and Huerfano County Economic Development will also apply for grants from the Gates Family Foundation, the Anschutz Family Foundation, and other organizations.

Use of Existing Infrastructure

The target area is fully served by sewer, storm, drinking water, electrical, telecommunication, natural gas, and transportation infrastructure. The reuse will require no infrastructure improvements beyond the property's boundaries. The inclusion of the parking garage in the design of the reuse plan will provide ample parking. Sidewalks along West 7th Street provide walkability surrounding the property.

Community Need and Community Engagement

Community Need – Community's Need for Funding

Huerfano County has long experienced population loss, low incomes, and high poverty and unemployment (Table 2). To address this, Huerfano County is working to transition from its past reliance on natural resource extraction, but its repercussions are still felt today.

Table 2	Huerfano County	Colorado	US
Population	7,082	5,877,610	348,185,467
Population Change Since 2010	+6%	+15.7%	7.7%
Median Income	$52,139	$92,911	$83,730
Below Poverty Level	17.5%	9.3%	10.6%
5-year Unemployment	5.8%	4.1%	4.4%

These factors impact consumer spending, resulting in lower business and sales tax revenues for revitalization projects and leaving the City without sufficient resources for property cleanup.

Sensitive Populations – Health or Welfare of Sensitive Populations

According to the 2023 Health Needs and Assessment Study, Huerfano County presents the following health data. Huerfano County has a 7.6% population with food insecurity and 12.9% on SNAP benefits. The Medicare population is 36.8% and Medicaid is 19.2% which makes for a population vulnerable to disease and illness.

Greater Than Normal Incidence of Disease and Adverse Health Condition

The County's lung cancer rate was 30.8 per 100,000 in 2020 and 2021, which makes the population vulnerable to asbestos-related diseases. The leading causes of death are cancer, heart disease, and chronic lower respiratory disease. All of these factors make the need for clean-up of the asbestos-contaminated site even more critical.

Disproportionately Impacted Populations

As stated above, the population has a high rate of cancer-caused deaths, with respiratory illness that leads to high vulnerability to asbestos-related exposure.

Community Engagement – Project Involvement and Roles

Since this location is so visible in the County, given its location, organized public meetings have not been needed. The public health hazards and issues arising from the fire at 135 W. 7th Street have been part of the City Municipal Court docket. The prior owner was served in May 2024 in Walsenburg Municipal Court for failing to clean up her property after the fire and for not securing the property. The court has suspended any action in 2025 because the owner either failed to appear or did not present a viable remediation plan. Therefore, efforts to have Huerfano County government acquire the property through donation were started to establish a plan for clean-up and reuse of the property. This was the most likely viable option to remove the eyesore and hazardous contents.

Huerfano County Economic Development President Lola Spradley has raised these issues with local Walsenburg City Council members and Huerfano County Commissioners on a regular basis. Local constituents who want to see action taken have approached elected officials with concerns on a regular basis.

The former Dry Cleaner and the Old Hospital are regular agenda items at the Huerfano County Economic Development Commission meetings and have been since the Assessment Grant was received in August 18, 2022. Each month, public reports of the progress of the assessment grant activities have been provided.

The County Commissioners have provided comment opportunities at their regularly scheduled meetings during the process of acquiring both properties at 127 and 135 W. 7th Street.

The Public Meeting for comments on the draft of the Clean Up grant is scheduled for December 30, 2025.

Incorporating Community Input

Once the clean-up grant is approved, Huerfano County will notify the public through its regular meeting notice process and set a public hearing. Lola Spradley, President of Huerfano County Economic Development, and Carlton Croft, Director of Huerfano County Economic

Development, will provide information on the grant and the process, as well as regular updates, during the regular Huerfano County Commissioners meetings. Information and updates will be provided during the project, the contracting process, and throughout the work schedules throughout the entire clean-up process. The status of all work and updates will also be made available through the Huerfano County Economic Development meetings each month by Lola Spradley and Carlton Croft. Quarterly updates will be reported to the Walsenburg City Council by the same individuals during the presentation portion of their regularly scheduled meetings. All of these update tools provide for public participation.

Task Descriptions, Cost Estimates, and Measure Progress

Proposed Cleanup Plan: Contaminated media to be addressed: The proposed project will be enrolled in the CDPHE Voluntary Cleanup Program. Approximately 5,000 sq. ft. of drywall surfacing and associated drywall, 20 linear feet of pipe insulation from the residence. The following items need to be removed from the Old Hospital: 2,000 sq. ft. of floor tile, 3,750 sq. ft. of roof sealant, 80 sq. ft. of roof systems, fire doors, 5 sq. ft. of window glazing, 3,100 sq. ft. of sheet vinyl flooring, 800 sq. ft. of popcorn ceiling texture, 5,000 sq. ft. drywall surfacing (stomp texture), 5,800 sq. ft. drywall system, 1,790 sq. ft., 200 linear feet of air cell pipe, which may have been damaged by the fire. Demolition of the residence, Old Hospital, and former dry cleaner buildings. Cleanup of groundwater at the former Dry Cleaner.

Cleanup Method: abatement by removal of asbestos in the residence and the Old Hospital, and the demolition of the residence, the Old Hospital, and the former Dry Cleaner buildings. The County will continue to work with its Qualified Environmental Professional (QEP) to select an abatement and demolition contractor through a competitive procurement process. The competitive procurement process will also be used to select a contractor who will complete in situ enhanced biological injections as part of the groundwater cleanup at the former Dry Cleaner.

Asbestos Abatement: will consist of permitting, site setup, construction of containment areas; removing, packaging, and labeling of asbestos waste for disposal; waste disposal at certified landfill; post-abatement cleanup; and third-party asbestos clearance monitoring and sampling.

Disposal Requirements: ACM waste will be disposed of at a landfill authorized by the CDPHE to accept non-hazardous, class 9, friable asbestos waste. Samples of building waste, which included various coatings, were submitted for laboratory analysis to evaluate leachable lead via the Toxicity Characteristic Leaching Procedure (TCLP) method. None of the waste associated with the residence, Old Hospital, or the former Dry Cleaner was found to exceed regulatory levels.

In situ Enhanced Bioremediation: will consist of permitting through the USEPA Underground Injection Control permit and the injection of a bioaugmentation culture that contains Dehalococcoides (Dhc) bacteria, a unique genus of bacteria known to break down toxic chlorinated ethenes, along with an electron donor.

Description of Tasks/Activities and Outputs: Task descriptions, including implementation methods, schedule, leads, and outputs, are provided in the table below

Task 1 – Grant Management	**Lead: The County with support from the QEP**
Implementation: 1. Cooperative agreement compliance and oversight. 2. Quarterly progress reporting. 3. Entries into the USEPA Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database. 5. Grant closure report summarizing accomplishments, expenditures, outcomes, outputs, lessons learned, and resources leveraged. 6. County participation in brownfield conferences/workshops. *Non-EPA Grant Resources will include 240 hours ($12,000) of in-kind County personnel/fringe and costs for travel to local EPA event ($1,227).*	
Schedule: Quarterly and annual reporting, ACRES entries when cleanup is complete, Closeout reporting at completion of cleanup. Conference workshops will be attended by the grant team.	
Outputs: Attend one conference and one workshop, Quarterly progress reports with budget and schedule status, annual reports, ACRES reporting, and Grant Closure Report.	
Task 2 – Community Outreach	**Lead:** The County, with the support of QEP
Implementation: *Non-EPA Grant Resources will include 60 hours ($3,000) of in-kind County personnel/fringe and costs.*	
Schedule:	
Outputs:	
Task 3 – Cleanup	**Lead:** QEP will oversee abatement, demolition, and in situ enhanced bioremediation under the direction of the County
Implementation: 1. Finalize Analysis of Brownfields Cleanup Alternatives (ABCA). 2. Prepare and obtain USEPA approval of an integrated sampling and analysis plan (SAP)/quality assurance project plan (QAPP) that details all project cleanup-related sampling protocols and quality assurance/quality controls. 3. Implement the cleanup plan, including all permitting and prework submittals, health and safety plan (HASP), site setup, removal and disposal of asbestos, demolition of buildings, and in situ enhanced bioremediation. 4. Preparation of a Closure Report documenting all aspects of the cleanup project. *Non-EPA Grant Resources will include 100 hours ($5,000) of in-kind County personnel/fringe and costs.*	
Schedule: Final ABCA and SAP/QAPP completed by 1/2027, approved by March 2027. Site setup, abatement, demolition, and enhanced bioremediation from May 1, 2027, to November 30, 2027. Cleanup report draft submitted, 1/31/2028, final by 6/30/2028.	
Outputs: Final ABCA, SAP/QAPP, HASP, Final cleanup/clearance data, Cleanup/Closure Report	

Cost Estimates: County personnel costs are based on a rate of $50/hour (Salary and Fringe) representing a combined representative rate for Carlton Croft and others. QEP costs are based on a rate provided by the QEP of $215/hour. Cleanup costs are based on an estimate provided by the abatement and demolition contractor and the injection contractor.

Task 1: Grant Management and Reporting: $???? [Personnel/Fringe: $?????]: TBD

Task 2: Community Outreach: $????? [Personnel/Fring: $?????]: TBD

Task 3: Cleanup – Total: $?????? [Personnel/Fringe $?????]: TBD

Budget Categories		**Task 1**	**Task 2**	**Task 3**	**Totals**
Direct Costs	Personnel/Fringe	$12,000.00	$3,000	$5,000	$20,000.00
	Travel/Supplies/Other	$1,227.00	$0.00	$0.00	$1,227.00
	Contractual	$16,450.00	$10,000.00	$895,000.00	$921,450.00
Total Direct Costs		$29,677.00	$13,000.00	$900,000.00	$942,667.00
Indirect Costs		$0.00	$0.00	$0.00	$0.00
Total Budget		**$29,677.00**	**$13,000.00**	**$900,000.00**	**$942,667.00**

Measuring Environmental Results: When preparing the project work plan, the County will develop a detailed schedule of key project milestones, including the completion of SAP/QAPP, scheduling and holding outreach events, and the commencement of remediation. At least monthly, the County will track and evaluate progress in achieving outputs and milestones against the work plan schedule, in addition to communicating with the QEP and project contractor(s). The County will increase monitoring and communication during the active cleanup phases to respond quickly to any unanticipated changes that may arise during this critical period. The City will monitor the project budget concurrently with tracking the schedule, on at least a monthly basis. The City will document project outputs, outcomes, and results in the quarterly progress reports to USEPA and in USEPA's ACRES database. Outcomes beyond the grant term will also be tracked in the ACRES database. Anticipated outputs are described in ???. Anticipated outcomes and results that the County will track include:

- Funding leveraged
- Increase in property values
- Reduction in the volume of hazardous materials

Programmatic Capabilities and Past Performance

Programmatic Capability – Organizational Structure and Key Staff: The County plans to sign a cooperative agreement with the Huerfano County Economic Development, LLC, (HCED) who will serve as the grant administrator. The HCED has done this with other grants (GRANT NAME) and

has the experience and the capacity to administer the cleanup grant. The HCED will use the internal team structure used for the FY22 Brownfield Grant to complete all Cleanup Grant tasks within the 3-year grant term. Carlton Croft, Director of Huerfano County Economic Development, will administer the grant and administer the assessment grant. He has the knowledge of this project and will be the most efficient staff member to administer the clean-up grant.

Acquiring Additional Resources: Huerfano County has an efficient USEPA-compliant procurement process in place to retain an abatement and demolition contractor. The Huerfano County Commissioners use the Colorado Springs Gazette, the Pueblo Chieftain and the Huerfano World Journal for public notices and bid solicitation.

Past performance and Accomplishments – Currently has or Previously Received a USEPA Brownfields Grant

Huerfano County received a $ 500,000 EPA Brownfield Community-Wide Assessment Grant for FY22. Huerfano County used the grant to establish a regional brownfields program, resulting in the following outputs:

- Brownfield inventories for the County (Walsenburg, La Veta, Gardner);
- 10 Phase I ESAs, 5Phase II ESAs;
- Cleanup planning for the Old Hospital and Former Dry Cleaner;
- Attended 2 EPA Region 8 Brownfield Workshops and 7 Region 8 grantee training calls;
- Held public meetings and conducted one-on-one outreach to high-priority brownfield owners;
- Completed quarterly reporting and ACRES updates.

Huerfano County is now using the last of the FY22 grant funding and is eager to continue this revitalization momentum with continued funding. Approximately $90,000 of funding remains, earmarked for use in planning and ABCA development of two sites: Lathrop Youth Camp and Rio Cucharas Inn. Such uses were approved in December 2025.

Compliance With Grant Requirements

Huerfano County is completing the FY22 EPA Brownfield Grant project in compliance with the Work Plan and Cooperative Agreement terms and conditions. The County has made progress and is reporting on its achievements in meeting the goals of the FY22 grant and Work Plan. Early in the FY22 grant period, the USEPA changed the Project Officer more than four times; however, a strong relationship has been established with the current USEPA Project Officer (PO), who recently granted a term extension. The County, EQP, and USEPA PO have created significant project momentum.

Threshold Criteria Response
FY2025 USEPA Brownfield Cleanup Grant Application
Old Hospital and Former Dry Cleaner – Walsenburg, Colorado

1. Application Eligibility
   Huerfano County, Colorado (the County), is the grant applicant and owner of the Old Hospital and Former Dry Cleaner (the Property). The County meets the definition of a General Purpose Unit of Local Government as defined in 2 CFR 200.64 and is therefore eligible for funding.
2. Previously Awarded Cleanup Grants

   The Property has not received funding from a previously awarded US Environmental Protection Agency (USEPA) Brownfield Cleanup Grant.

3. Site Ownership

   The County is the sole owner of the Property. The title is fee simple. The two tax parcels forming the Property were acquired by the County on December 16, 2025.

4. Basic Property Information

   Name of Property: Old Hospital and Former Dry Cleaner

   Property Address(s): 135 West 7th Street and 123-129 West 7th Street, Walsenburg, Colorado 81089

   Current Owner: Huerfano County

5. Status and History of Contamination at the Property
   a. Contaminants of concern (COC) at the Property are hazardous substances. COCs at the Property are associated with building materials and tetrachloroethene in groundwater.
   b. Historical records show that the Property was developed with small structures dating back to the early 1900s, with various additions and improvements made up to the 1920s when both the Old Hospital and the Former Dry Cleaner were reportedly constructed. In 1924, the Old Hospital expanded to 80 beds. The Old Hospital survived until 1960, when the owners raised the rent, and it was subsequently closed. It was later turned into the Walsenburg Care Center and provided nursing home services for the County until March 2011. After that, it became an antique mall. In 2021, the building and private residence were sold to a private individual. Most portions of the Old Hospital were involved in a major fire in October 2023. Since the fire, the Old Hospital has remained vacant. The former Dry Cleaner was constructed in the 1900s, and was occupied by the

Model Tailor Dry Cleaners at 127 W. 7th Street from 1948 to the early 1990s. The dry cleaner building has remained generally unused since the departure of the latest tenant in 2009.

c. In 2025, an asbestos and lead survey, as well as Limited Phase II ESAs, were completed. Asbestos was identified in the Old Hospital, and contaminated groundwater was identified at the Property. The condition of some of the asbestos-containing building materials was impacted by the fire, and in some areas, the building is inaccessible due to structural damage resulting from the fire. A summary of the quantities of the COC is presented in the table below.

Contaminant	Estimated Quantity	Building Material or Media
Asbestos	29,352 square feet (sq. ft.) 220 linear feet	Wall texture, insulation, drywall system, sheet flooring, roofing materials
Chlorinated ethenes	4,400 sg. ft.	On-site groundwater

The asbestos will be abated from the buildings at the Property to allow for demolition and prepare the Property for redevelopment. Enhanced bioremediation will be used to clean up contaminated groundwater and protect future users of proposed site buildings from exposure to indoor air contaminants.

d. Asbestos was commonly used in building materials prior to the passage of regulations on asbestos in the 1980s, and the Old Hospital has been documented as containing multiple building materials that contain asbestos. Due to the fire, many of these materials have deteriorated, creating a potential exposure risk to the public. The building has remained secure since 2023. Similarly, the use of chlorinated ethenes, specifically tetrachloroethene (PCE), was common in dry cleaning operations until recent changes in the cleaning process. PCE has been documented in groundwater. The abatement of the identified asbestos and remediation of the groundwater will enable the demolition of the Old Hospital building and reduce exposure to contaminated groundwater and vapors that may migrate into the structure constructed as part of the redevelopment.

6. <u>Brownfields Site Definition</u>

The Property meets the USEPA definition of a brownfield. It is a real property where redevelopment and reuse are complicated by the presence of contamination (asbestos and contaminated groundwater).

a. The Property is not currently, and has not historically been listed or proposed for listing to the National Priorities List.

b. The Property is not currently, and has not historically ever been subject to unilateral administrative order, court orders, administrative orders on consent or judicial consent decrees issued to or entered into by parties under CERCLA.
c. The Property is not subject to the jurisdiction, custody, or control of the US government.

7. Environmental Assessment Required for Cleanup Grant Proposals

A report entitled *Asbestos and Lead Inspection and Sampling Report, Old Hospital, 135 West 7th Street, Walsenburg, Colorado*, dated May 14, 2025, provided a summary of the nature, extent, and quantity of asbestos associated with building materials in the Old Hospital. Additionally, the following Limited Phase II Environmental Site Assessments were completed:

- *Limited Phase II Environmental Site Assessment, 123, 125, 127, and 129 West 7th Street, Walsenburg, Colorado*; and
- *Limited Phase II Environmental Site Assessment, 135 West 7th Street, Walsenburg, Colorado*.

These reports constitute Phase II Environmental Site Assessments equivalent to the ASTM International E1903-11 standard.

8. Enforcement or Other Actions

No enforcement actions are known or anticipated for the Property. There have been no inquiries or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the hazardous substances at the Property. There are no environmental liens on the Property.

9. Sites Requiring a Property-Specific Determination

None of the special classes of property that require a property-specific determination in order to be eligible for funding applies to the Property.

10. Threshold Criteria Related to CERCLA Liability
    a. Property Ownership Eligibility – Hazardous Substances Sites
        i. Exemption to CERCLA Liability
            1. Indian Tribes – NOT APPLICABLE
            2. Alaska Native Village Corporations and Alaska Native Regional Corporations – NOT APPLICABLE
            3. Property Acquired Under Certain Circumstances by Units of State and Local Government

ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability
    1. Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002 – NOT APPLICABLE

iii. Landowner Protections from CERCLA Liability

CERLA has not been triggered related to the asbestos building components because: a) the materials are not the result of past industrial operations or improper storage or waste disposal; b) no release of these materials to the environment has occurred. All asbestos at the Property is integrated into various building components.

The County acquired title to the Property ???? At the time of the County's acquisition, the buildings were vacant with no active operations. Its most recent use had been as a theatre. There has been no change in the use or condition of the Property since the County's acquisition.

The County affirms it is not liable in any way for contamination regulated under CERCLA at the Property or affiliated with a responsible party. No disposal of hazardous substances at the Property has been documented, and the County affirms that it has not, at any time, arranged for the disposal of hazardous substances at the Property or transported hazardous substances to the Property.

The County will continue to maintain the Property's security to limit access and prevent disturbance of building materials that contain asbestos. There are currently no uses of the groundwater, and since the buildings on the Property are vacant, potential vapors migrating from the groundwater to the interior do not present a long-term risk.

The County affirms its commitment to: 1) assist and cooperate with those performing the cleanup and to provide access to the Property; 2) comply with all information requests and administrative subpoenas that have or may be issued in connection with the Property; and 3) provide all legally required notices. There are no land use restrictions or institutional controls imposed on the Property.

11. <u>Cleanup Authority and Oversight Structure</u>
    a. Describe how you will oversee the cleanup at the Property
    b. Impact of cleanup response activities on neighboring properties

12. Community Notification

The County provided the community with notification on December 17, 2025, and held a public meeting on December 30, 2025, to communicate its intent to apply for a USEPA Brownfield Cleanup Grant, and allowed the community an opportunity to comment on the draft grant application package, including the draft Analysis of Brownfield Cleanup Alternatives (ABCA) prepared for the Property. Community notifications details are provided below.

a. Draft Analysis of Brownfield Cleanup Alternatives

Draft ABCAs summarizing information about the Property and contamination issues, cleanup standards, and applicable laws. The cleanup alternatives considered for each option, as well as the chosen alternatives, include information on effectiveness, the applicant's ability to implement, cost, and a reasonableness analysis. A copy of the draft ABCA is provided as Threshold Criteria Response Attachment A.

b. Community Notification Ad

A community notification advertisement was published in the Huerfano World Journal, the newspaper serving Walsenburg and Huerfano County, Colorado, on December 18, 2025, and on the County website with the notice of a public meeting at their regular commissioner's meeting on December 30, 2025. The ad indicated the following:

- That a draft copy of the USEPA Brownfield Cleanup Grant application, including the draft ABCAs, was available for public review and comment;
- How to comment on the draft proposal;
- Where the draft proposal could be accessed; and
- The date and time of the public meeting.

A copy of the ad is provided in the Threshold Criteria Attachments.

c. Public Meeting

The County discussed the draft proposal and considered public comments during the public meeting held on December 30, 2025. Required meeting materials are provided in the Threshold Criteria Attachments.

d. Submission of Community Notification Documents

Community notification documents are provided as indicated below.

- Draft ABCA – Threshold Criteria Response Attachment A
- Community Notification Ad - Threshold Criteria Response Attachment B
- Summary of meeting and comments and responses - Threshold Criteria Response Attachment C
- Community Meeting Presentation - Threshold Criteria Response Attachment D
- Community Notification Meeting Participant List - Threshold Criteria Response Attachment E

Threshold Criteria Response – Attachment A

Draft Analysis of Brownfield Cleanup Alternatives

Geosyntec consultants

engineers | scientists | innovators

DRAFT ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

Old Hospital and Former Dry Cleaner
123, 125, 127, 129 and 135 West 7th Street
Walsenburg, Colorado 81089

Prepared for

Huerfano County Economic Development
525 South Albert Avenue
Walsenburg, Colorado 81089

Prepared by

Geosyntec Consultants, Inc.
13 South Tejon Street, 5th Floor
Colorado Springs, Colorado 80903

Project: DE0605A

December 2025

Draft Analysis of Brownfields Cleanup Alternatives

Old Hospital and Former Dry Cleaner

Prepared for

Huerfano County Economic Development

This document, entitled DRAFT Analysis of Brownfield Cleanup Alternatives – Old Hospital and Former Dry Cleaner, Walsenburg, Colorado, was prepared by Geosyntec Consultants, Inc. (Geosyntec) for the account of the Huerfano County Economic Development (the "Client"). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Geosyntec's professional judgment in light of the scope, schedule, and other limitations stated in the document and in the contract between Geosyntec and the Client. The opinions expressed in the document are based on conditions and information existing at the time of publication and do not take into account any subsequent changes. Any use that a third party makes of this document is the responsibility of such third party. Such third party agrees that Geosyntec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Nick Talocco, PE
Senior Engineer

Amy Dzialowski
Senior Principal

Project Number: DE0605A

December 2025

Geosyntec consultants

TABLE OF CONTENTS

LIST OF FIGURES

1. INTRODUCTION AND BACKGROUND

This Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared by Geosyntec Consultants, Inc. (Geosyntec) for the Huerfano County Economic Development, LLC (HCED). The purpose of the ABCA is to present options and costs for the abatement of asbestos-containing materials (ACM) identified during the Asbestos and Lead Inspection and Sampling Report Old Hospital cover letter dated May 14, 2025 (Geosyntec, 2025a), demolition of the buildings on the Old Hospital and Former Dry Cleaner, and remediation of groundwater contamination identified in the Limited Phase II Environmental Site Assessment Reports dated December 1, 2025 and December 15, 2025 (Geosyntec, 2025b and 2025c).

1.1 Property Location and Description

The Old Hospital comprises two buildings, totaling 12,917 square feet in size, located at 135 West 7th Street. The Former Dry Cleaner consists of one building, totaling 2,000 square feet, divided into three units, and is located at 123, 125, and 127 West 7th Street in Walsenburg, Colorado. The Huerfano County Assessor's Office identifies the Old Hospital as Parcel Number 62500 and the Former Dry Cleaner as Parcel Number 19350, which total 0.55 acres and are defined as the Property.

The buildings associated with the Old Hospital cover most of Parcel Number 62500, except for a small courtyard. The Former Dry Cleaner comprises a small commercial building located on the north side of Parcel Number 19350 and is generally vacant in the southern half, except for a foundation that remains from a former building that was demolished. The location of the Property, the parcel boundaries, and the Property layout are presented on **Figures 1 and 2**.

The Old Hospital has been vacant since 2021, when it was last used as an antiques mall. Most portions of the Old Hospital were damaged in a fire in October 2023, which significantly impacted the structure. The fire and long vacancy have resulted in water damage. The Former Dry Cleaner has sat vacant since its last tenant in 2009. In 2025, Huerfano County acquired the Property in hopes of demolishing all the buildings on the Property, completing limited groundwater remediation, and promoting the property's revitalization.

1.2 Property History

The Old Hospital was originally constructed in 1890 with subsequent additions through 1924, including the construction of a single-family residence on the southwest corner of the Property. The Former Dry Cleaner was constructed in 1900 with a second, smaller structure in the 1930s. This second, smaller structure was then demolished in ????.

1.3 Site Assessment Findings

In 2025, Geosyntec completed various assessments for the Property. The assessments consisted of evaluating ACM, lead-based paint, and groundwater contamination. The findings of the assessments are summarized below.

1.3.1 Asbestos Containing Materials

The following building materials were determined to contain asbestos in quantities greater than 1%:

The Category I non-friable materials identified at the residence include the following:

- Roof Mastic – roof of residence – 3 square feet (SF)

The RACM that was identified in the residence includes the following:

- Drywall surfacing (smooth texture) and associated drywall - 5,000 SF
- Pipe insulation – 20 linear feet (LF)

The Category I non-friable materials identified in the Old Hospital include the following:

- Floor tile – northwest wing of the hospital – 2,000 SF
- Roof Sealant – old hospital roof – 3,750 SF
- Roof system – east and west sheds – 80 SF

The Category II non-friable materials identified in the Old Hospital include the following:

- Fire Doors – northwest and southwest wing - assumed
- Window glazing -storage room 2 – less than 1 SF

The RACM that was identified in the Old Hospital includes the following:

- Sheet vinyl flooring – northwest and southwest wings of Old Hospital – 3,100 SF
- Popcorn ceiling – northwest wing of Old Hospital – 800 SF
- Drywall surfacing (stomp texture) - northwest wing of Old Hospital – 5,000 SF
- Drywall System – throughout northwest wing – 5,800 SF
- Drywall surfacing (smooth texture) and associated drywall – storage rooms 1, 2, 3, and 4 of old hospital – 1,790 SF

The ACMs identified in the 2011 Survey (CDPHE, 2011) included the same sheet vinyl flooring, a wall texture, a friable plaster, air cell insulation, and non-friable black tar with silver resinous facing and vents throughout the Old Hospital. These materials need to be removed prior to demolition.

It should be noted that the asbestos survey was limited due to the damage caused by the fire at the Old Hospital. The asbestos survey was limited to accessible materials only and did not include all wall cavities, underground utilities, roofing, or crawl spaces. It is anticipated that, due to the damage caused by the fire, most of the asbestos in the Old Hospital will be removed using open-air abatement techniques, which means that all building materials will be disposed of as asbestos-containing waste.

No RACM was identified in the Former Dry Cleaner.

1.3.2 Lead-Based Paint

Since the buildings associated with the Property are planned for demolition, lead toxicity characteristic leaching procedure (TCLP) testing was conducted on building materials from the Old Hospital and the Former Dry Cleaner building to assess the potential for lead leaching from disposed building materials over time. All the TCLP samples were found to be below the laboratory reporting limits and, therefore, not a risk to leach lead.

1.3.3 Groundwater Contamination

The use of the Property as a dry cleaner was identified as a potential environmental concern, specifically related to groundwater impacts resulting from the release of dry cleaning solvents. Additionally, historical adjacent uses were identified at properties adjacent to and upgradient of the Property that may have resulted in groundwater impacts.

Contamination levels for trichloroethene (PCE) have ranged from 4.3 micrograms per liter (µg/L) to 420 µg/L from 2019 to 2025 in monitoring wells installed on the portion of the Property associated with the former Dry Cleaner (Geosyntec, 2025b). Additionally, evidence of groundwater impacts from upgradient sources has been identified at the Property (Geosyntec, 2025c). It appears that groundwater contamination from the Property and the upgradient sources has combined, as evidenced by the presence of groundwater contamination south of the Property (Figures 3 and 4).

1.3.4 Soil Contamination

Due to the historical use of a portion of the Property as a dry cleaner, the potential for soil contamination at the Property was identified as an environmental concern. Soil sample results from 2019 to 2025 don't suggest the soil at the Property has been impacted (Geosyntec, 2025b).

1.3.5 Soil Gas

Since there is evidence of groundwater contamination at the Property resulting from the release of chlorinated solvents due to the dry cleaner's operations and off-site sources, there is a potential that the volatilization of these chlorinated solvents will produce soil gas that can collect within proposed buildings that may be constructed as part of the redevelopment. Since any remedy to be installed to prevent the migration of this soil gas into the new building would be incorporated into the construction of the new building, remedial alternatives for the mitigation of soil gas were not evaluated as part of this ABCA.

2. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

The following sections provide details regarding the cleanup responsibilities and applicable laws and regulations.

2.1 Cleanup Oversight Responsibilities

The cleanup will be conducted in accordance with regulations described in the following sections. All documents prepared for the Property will be submitted to the Colorado Department of Public Health and Environment (CDPHE), Voluntary Cleanup Program (VRP), and Air Pollution Control Division (APCD).

2.2 Applicable Laws and Regulations

The following regulations are applicable to the project.

2.2.1 Colorado Voluntary Cleanup Program

Authority for the Voluntary Clean-up Program is derived from the Voluntary Cleanup and Redevelopment Act (the Act) (C.R.S.25-16-301), passed in 1994. The purpose of the Act is to "Provide for the protection of human health and the environment and to foster the transfer, redevelopment and reuse of facilities that had been previously contaminated with hazardous substances or petroleum products." The program is designed to operate expeditiously, with minimal administrative processes and costs. Accordingly, no regulations have been promulgated for the Voluntary Cleanup and Redevelopment Act.

2.2.2 Asbestos Regulations

Asbestos is regulated by the U.S. Environmental Protection Agency (USEPA) National Emission Standard for Hazardous Air Pollutants (NESHAP), the Toxic Substances Control Act (TSCA), and the Clean Air Act (CAA). The CDPHE also regulates asbestos under Regulation No. 8 – Asbestos and defines an ACM as any material containing greater than 1% asbestos. CDPHE Regulation No. 8 – Asbestos provides requirements for training/certification, notification, and ACM-related operations.

2.2.3 Lead Bearing Waste (Hazardous Waste Management)

The USEPA and CDHPE both regulate the disposal of hazardous waste. Solid waste is regulated under the Resource Conservation and Recovery Act. Non-household generators of potentially lead-bearing waste must make a hazardous waste determination prior to disposal. Lead-bearing waste must be managed as either solid waste or a hazardous waste, depending on the results of the TCLP test for lead.

2.2.4 Groundwater Regulations

The CDPHE regulates groundwater under Regulation No. 41 – The Basic Standards for Groundwater (5 Colorado Code of Regulations 1002-41). The regulations are promulgated pursuant to the Colorado Water Quality Control Act, sections 25-8-101 through 25-8-703. In particular, they are promulgated under Sections 25-8-202, 25-8-203, and 25-8-204. The purpose of these regulations is to establish statewide standards and a system for classifying groundwater

and adopting water quality standards for these classifications, thereby protecting existing and potential beneficial uses of groundwater.

3. CLEANUP ALTERNATIVES

The following sections provide details on the cleanup alternatives evaluated for the Property.

3.1 Remedial Action Objective

The remedial action objectives for the ACM and groundwater are to prevent them from causing an unacceptable risk to human health and the environment. The following formula is commonly used to represent risk:

RISK = EXPOSURE x CONCENTRATION

As indicated by this common formula, risk can be reduced by limiting exposure or by reducing the magnitude of the contamination concentration. The human exposure pathway of concern for ACMs is inhalation. ACM exposure can be limited by isolating ACMs from human contact or by maintaining ACMs in good condition, so that asbestos fibers are not released into indoor air, where exposure via inhalation could occur. The only way to reduce the ACM concentration is to abate the ACMs, which would reduce the concentration to zero. If the concentration is zero, then the risk would also be zero.

The exposure pathway related to groundwater contamination can occur via ingestion, inhalation, or dermal exposure. Exposure to contaminated groundwater can be limited by limiting the use of the groundwater. The only way to reduce groundwater contamination is to implement remedial efforts with the goal of reducing contaminant concentrations in groundwater to meet groundwater standards, which may limit exposure but not entirely eliminate it.

3.2 Cleanup Alternatives Considered for Asbestos

Three alternatives were considered: No Abatement, Partial Abatement, and Complete Abatement. The optimal cleanup alternative for ACM depends on the timing of the demolition plans for the Property. The evaluation of the three alternatives is described below. These options cover the full spectrum of possible cleanup alternatives.

3.2.1 Alternative 1: No Abatement of ACM

The no abatement alternative is essentially the alternative that has been implemented to date. Under this alternative, the County would need to continue securing the building to prevent trespassing.

Various ACMs were identified associated with the Old Hospital and noted as being damaged due to the fire and the general deterioration resulting from the building's vacancy. ACMs in poor or damaged condition represent a current risk to anyone who may enter the building. As a result, if the No Abatement Alternative is selected, signage identifying this potential hazard will be erected, and where reasonably implementable, access to these areas will be prohibited and barred.

To prevent ACM releases to the exterior environment surrounding the Property, the building envelope must be maintained as much as possible. This would include the installation of plywood to “board up” all windows and doors.

Due to the fire, there is a possibility that portions of the Old Hospital might collapse under the No Abatement alternative. Under the No Abatement Alternative, the County must 1) limit access to the building interior using security measures, 2) ensure that the hazards of building entry are properly communicated to any County personnel that may enter the building, and 3) establish an entry protocol for County personnel that may enter the building.

3.2.2 Alternative 2: Partial Abatement of ACM

The partial abatement alternative would include abating all ACM in poor condition, erecting signage, and boarding up the building as a temporary measure to reduce the current risk to human health and the environment. Under this alternative, ACM and other hazardous materials would remain in the building and would require the implementation of an Operations and Maintenance Plan to ensure remaining ACMs do not pose a threat to the public or the environment.

3.2.3 Alternative 3: Complete Abatement of ACM

The complete abatement alternative requires the abatement of all ACM. This alternative must be selected if the building is to be demolished and is the preferred alternative, allowing for substantial redevelopment of the property to be completed. Under this alternative, all ACM would be removed, and there would be no ongoing management requirements.

3.3 Cleanup Alternatives for Groundwater

Three alternatives were considered: no groundwater remediation, enhanced in situ bioremediation injections, and a liquid activated carbon product injection (e.g., BOS-100 or PlumeStop®). The evaluation of the three alternatives is described below. These options cover the full spectrum of possible cleanup alternatives.

3.3.1 Alternative 1: No Groundwater Remediation

The no groundwater remediation alternative is essentially the alternative that has been implemented to date. Under this alternative, groundwater at the Property related to the dry cleaner operations would continue to comingle with other groundwater contaminants downgradient, and the regional shallow groundwater in this portion of Walsenburg would remain contaminated. The County would need to use engineering and institutional controls to ensure that there is no use of groundwater at the Property or downgradient. The potential risk of volatilization of contaminants from groundwater to soil gas would remain a concern for building occupants at the Property and downgradient, and as a result, a vapor mitigation system(s) would need to be installed at the Property at a minimum.

3.3.2 Alternative 2: Enhanced In Situ Bioremediation Injections

The enhanced in situ bioremediation alternative would include the injection of natural microorganisms and anaerobic water with nutrients into the groundwater. Under this alternative, natural microorganisms begin to grow and migrate with the groundwater, thriving where contaminants and electron donors are present, and where redox conditions are favorable in the groundwater. This alternative will promote the degradation of chlorinated solvents at the Property and downgradient over time. This will reduce the need for the County to limit groundwater use, and the alternative would have some impact on the regional groundwater plume present in the vicinity of the Property. The alternative would also likely reduce the groundwater concentration

at the Property and in the surrounding area, limiting the risk of soil gas migrating to buildings at the Property and downgradient.

3.3.3 Alternative 3: Liquid Activated Carbon Injections

The liquid-activated carbon injection coats aquifer materials with a highly adsorptive carbon layer, capturing dissolved contaminants directly in place. This alternative will promote the degradation of chlorinated solvents at the Property over time. This will reduce the need for the County to limit groundwater use at the Property; however, it is unlikely to have an impact on the downgradient groundwater that is mixing with the regional plume. The alternative would also likely reduce the risk of soil gas migrating to buildings at the Property.

4. CLEANUP ALTERNATIVE EVALUATION

To satisfy USEPA requirements, three characteristics of each alternative - effectiveness, implantability, and cost - must be considered prior to selecting a recommended cleanup alternative. These characteristics are considered for each alternative in the following sections.

4.1 Effectiveness

Effectiveness is evaluated by 1) the ability to achieve the desired level of protection as quickly as possible, and 2) whether the alternative can maintain the desired level of protection over the long term.

4.1.1 Effectiveness of ACM Cleanup Alternatives

The following is an evaluation of the effectiveness of the selected ACM cleanup alternatives.

4.1.1.1 Alternative 1: No Abatement of ACM

The no abatement alternative would use engineering and institutional controls (e.g., signage, fencing, and plywood) to manage identified ACMs and other hazardous materials in place within the Old Hospital buildings. These various engineering and institutional controls, if properly implemented, would mitigate the risk associated with the ACM by minimizing or eliminating human exposure to these materials. The effectiveness of this alternative requires initial measures to isolate hazards and continued management to maintain hazard isolation.

Alternative 1 would only be effective if no demolition or reuse were planned for the Property and the building was to remain secured and unused. Alternative 1 would not effectively control or prevent exposure to the surrounding environment and would continue to be an eyesore for the community. Leaving the Property as is would hinder any opportunity for redevelopment and leave the community with an environmental liability; therefore, Alternative 1 is not effective given the County's plan for reuse of the Property.

4.1.1.2 Alternative 2: Partial Abatement of ACM

The partial abatement alternative would utilize a combination of abatement of selected materials and engineering and institutional controls to mitigate risks associated with the ACM in the Old Hospital buildings. Various engineering and institutional controls, if properly implemented, would mitigate the risk associated with hazardous materials that the County may elect to leave in place by minimizing or eliminating human exposure to these materials.

The abatement of selected materials would eliminate the potential for exposure to those selected materials only. This alternative would require partial hazardous materials abatement, initial measures to isolate remaining hazards, and continued management to maintain hazard isolation.

Alternative 2 would be reasonably effective only in limiting potential access to the ACM that has been damaged by the fire; it would not aid in the redevelopment of the Property, and therefore, Alternative 2 is not effective given the City's plans for complete, rather than partial, reuse of the building.

4.1.1.3 Alternative 3: Complete Abatement of ACM

The complete abatement alternative would use abatement to remove all ACMs. With all the ACM removed from the Old Hospital buildings, the risk to human health and the environment associated with exposure would be eliminated. Additionally, the removal of all regulated ACM is required by the CDPHE prior to the demolition of a building; therefore, for the purpose of redevelopment of the Property, it is necessary. Alternative 3 is an effective way to eliminate risk at the Property, as the ACMs would be removed, thereby eliminating exposure. Additionally, it would assist in moving the Property towards redevelopment.

4.1.2 Effectiveness of Groundwater Cleanup Alternatives

The following is an evaluation of the effectiveness of the selected groundwater cleanup alternatives.

4.1.2.1 Alternative 1: No Groundwater Remediation

The no groundwater treatment alternative would use engineering and institutional controls to manage the use of groundwater at the Property and downgradient. This alternative would quickly provide protection to the occupants of the Property by implementing a vapor mitigation system and utilizing water supplied by the City of Walsenburg. However, it does not offer easily achievable long-term protection.

4.1.2.2 Alternative 2: Enhanced In Situ Bioremediation Injections

The enhanced in situ bioremediation injections will achieve the desired protection relatively quickly. The most important factor the process promotes is the natural degradation of chlorinated solvents. Microorganisms will remain active as long as there are electron donors and contaminants, allowing them to persist in the environment over time. As they migrate with groundwater to areas downgradient, there is a possibility that the microorganisms will degrade contaminants coming from upgradient sources. Based on the effectiveness of the remediation, it may limit the need for engineering and institutional controls.

4.1.2.3 Alternative 3: Liquid Activated Carbon Injections

The liquid-activated carbon injections would achieve the desired protection relatively quickly, primarily for the Property. However, the liquid-activated carbon would require a longer time to have an impact on groundwater quality downgradient and may potentially be overwhelmed over time.

4.2 Ability to Implement

An assessment of the ability to implement an alternative is intended to evaluate whether, or with how much difficulty, the cleanup alternative can be implemented and whether the alternative's continued effectiveness can be assessed and verified.

4.2.1 Ability to Implement Asbestos Alternatives

The following provides an assessment of the ability to implement the asbestos cleanup alternatives.

4.2.1.1 Alternative 1: No Abatement of ACM

Alternative 1 has generally already been implemented by the City. Geosyntec recommends that, if this alternative is anticipated to continue for multiple years, limited additional measures be taken

to ensure the isolation of hazardous building materials in poor condition from access by those who may enter the Old Hospital buildings. Further, the effectiveness of Alternative 1 is readily verifiable through the collection and analysis of air samples for ACM fibers in the air surrounding the Property. Alternative 1 is considered moderately easy to implement as it will require monitoring of institutional and engineering controls to mitigate exposure to ACM.

4.2.1.2 Alternative 2: Partial Abatement of ACM

The partial abatement alternative requires implementing both: 1) limited ACM abatement and 2) the same engineering and institutional controls required under Alternative 1 for any materials not abated. There are no asbestos abatement contractors based in Walsenburg, Colorado. There are asbestos abatement contractors in Pueblo and Colorado Springs. Thus, the technical capabilities to perform the limited asbestos abatement are reasonably available.

Alternative 2 is considered moderately easy to implement as it will require mobilizing abatement personnel and equipment to the Property and conducting partial abatement, as well as monitoring of institutional and engineering controls to mitigate exposure to remaining hazardous building materials.

4.2.1.3 Alternative 3: Complete Abatement of ACM

The complete abatement alternative requires comprehensive abatement of ACMs. Alternative 3 will not require ongoing institutional or engineering controls. The ability to implement Alternative 3 is comparable to Alternative 2, as both alternatives require mobilizing abatement personnel and equipment to the Property and conducting abatement. The additional abatement required for Alternative 3 is offset by eliminating the need for ongoing controls and monitoring, which allows for the demolition of the Old Hospital buildings at the Property and facilitates redevelopment.

4.2.2 Ability to Implement Groundwater Remediation Alternatives

The following provides an assessment of the ability to implement the groundwater remediation alternatives.

4.3 Cost of Alternatives

The cost to complete the alternatives is part of the weighted evaluation of each alternative.

4.3.1 Cost of Asbestos Alternatives

The following provides an assessment of the costs of the asbestos cleanup alternatives.

4.3.1.1 Alternative 1: No Abatement of ACM

The rough order-of-magnitude cost associated with Alternative 1 is approximately $25,000. These costs are associated with 1) added isolation measures for ACMs' poor condition; 2) continued monitoring to evaluate whether materials that are presently intact deteriorate over time; and 3) maintaining the building envelope. This does not account for the considerable lost opportunity cost of leaving the Property unfit for community use.

4.3.1.2 Alternative 2: Partial Abatement of ACM

The rough order-of-magnitude cost estimate for this alternative ranges from $200,000. The low-end cost estimate includes the abatement of ACMs in poor condition and all elements of Alternative 1.

4.3.1.3 Alternative 3: Complete Abatement of ACM

The rough order-of-magnitude cost estimate for this alternative is $550,000. This estimate includes the abatement of all ACMs listed in Section 2 of this ABCA.

4.3.2 Cost of Groundwater Remedial Alternatives

The following provides an assessment of the costs of the groundwater remedial alternatives.

4.3.3 Green Remediation Considerations

The carbon footprint associated with asbestos abatement is relatively small. The selected abatement contractor is likely to be located in Colorado Springs or Pueblo. It is planned that the abatement contractor will conduct the abatement and demolition work during a single mobilization to minimize travel.

The proposed remedial alternatives for the groundwater cleanup have a small carbon footprint. Neither the in situ bioremediation nor the liquid activated carbon injections would require the long-term use of electricity or water. Generally, the implementation of either in situ bioremediation or liquid activated carbon injections can be completed in one mobilization, and each will produce limited waste. The in situ bioremediation relies on the natural degradation of chlorinated solvents.

5. RECOMMENDED CLEANUP ALTERNATIVE

To quantitatively evaluate the cleanup alternative, the following system was utilized:

- Good – 5 points
- Good-Moderate - 4 points
- Moderate – 3 Points
- Moderate-Poor - 2 Points
- Poor – 1 Point

5.1 Quantitative Evaluation of Asbestos Abatement Alternatives

A quantitative evaluation of the asbestos abatement alternatives was conducted and summarized below:

Alternative	Effectiveness	Ability to Implement	Cost	Score
Alternative 1	Poor: 1	Good-Moderate: 4	Good-Moderate: 4	9
Alternative 2	Moderate-Poor: 2	Moderate: 3	Moderate: 3	8
Alternative 3	Good: 5	Moderate: 3	Moderate: 3	11

Based upon the quantitative evaluation scoring and the plan to demolish the buildings at the Property, Alternative 3: complete abatement is recommended.

5.2 Quantitative Evaluation of Groundwater Remedial Alternatives

A quantitative evaluation of the groundwater remedial alternatives was conducted and summarized below:

Alternative	Effectiveness	Ability to Implement	Cost	Score
Alternative 1	Poor: 1	Good-Moderate: 4	Moderate: 3	8
Alternative 2	Good: 5	Moderate: 3	Moderate: 3	11
Alternative 3	Good-Moderate: 4	Moderate: 3	Moderate: 3	10

Based upon the quantitative evaluation scoring and the plan to demolish the buildings at the Property, Alternative 2: in situ enhanced bioremediation is recommended.

6. REFERENCES

Reports

Geosyntec. 2024. *Generic Quality Assurance Project Plan for Brownfields Assessment – REV 2, Huerfano County Economic Development*. June 11, 2024.

Geosyntec. 2025. *Sampling and Analysis Plan, Fromer Dry Cleaners 123, 125, 127, and 129 West 7th Street, Walsenburg, Colorado*. Geosyntec Consultants, Inc. June.

FIGURES

Threshold Criteria Response – Attachment B

Community Notification Ad

Threshold Criteria Response – Attachment C

Summary of Meeting and Comments to Responses

Threshold Criteria Response – Attachment D

Community Meeting Presentation

PRESENTATION OUTLINE FOR DISCUSSION

1. Received Assessment grant - Lola
2. Conducted Phase 1 and Phase 2 on selected properties and results- Nick
3. Results on Properties at 123 through 135 W. 7th Street - Nick
4. Securing government or non-profit ownership of said properties - Carlton
5. Preparing to clean up said properties via this grant - Lola
6. Details of grant costs and plans for clean up and timeline - Nick
7. Submittal of grant for NOFO deadline of January 28 - Lola
8. Availability of draft grant proposal - Lola
9. Opportunity for public comments