

Keeping the Accelerator on During COVID-19

COLORADO SMELTER SUPERFUND SITE, REGION 8



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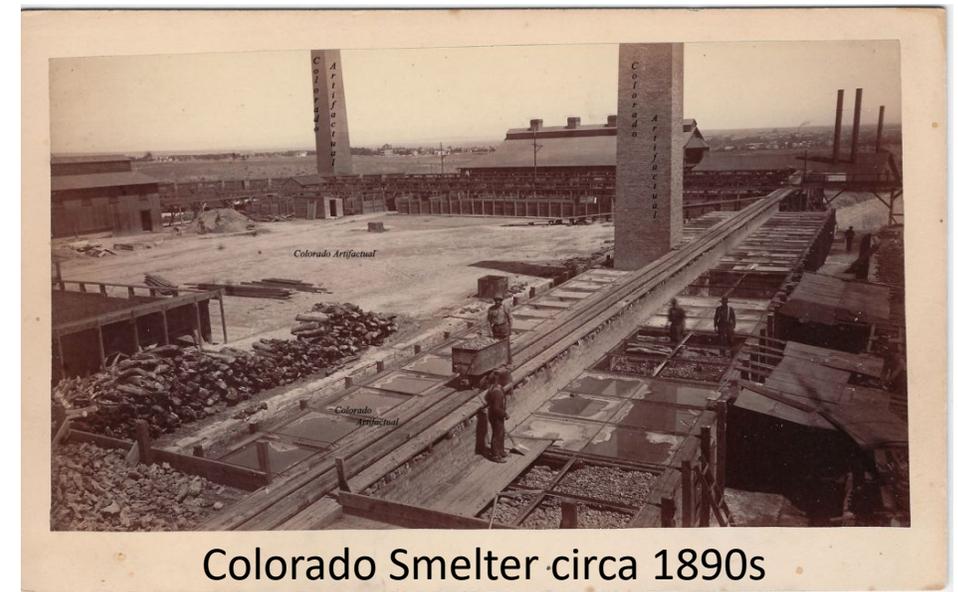


Background

- Colorado Smelter - former lead and silver smelter located in Pueblo, Colorado
 - Pueblo once home to five historic ore smelters
 - CO Smelter active from 1883-1908
 - An active steel mill is located directly to the south
 - Working class, environmental justice community
- Rich immigrant history in surrounding neighborhoods of Grove, Bessemer, and Bojon Town/Eilers



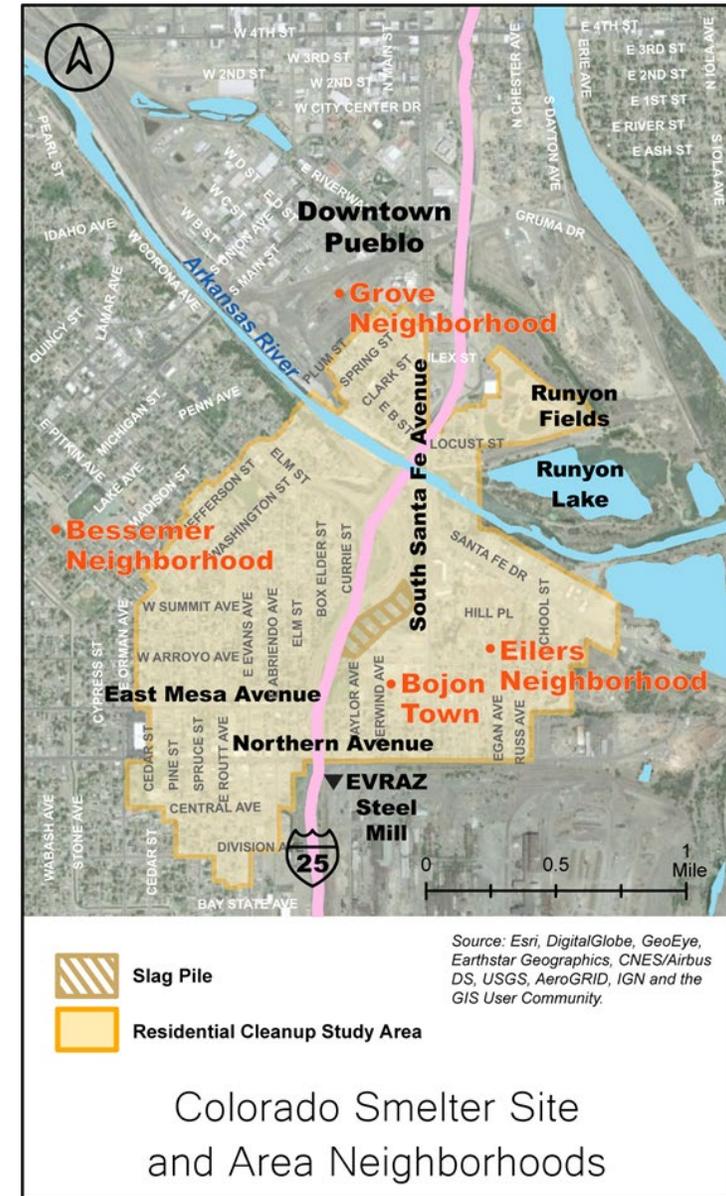
Former Pueblo Smelters and active steel mill



Colorado Smelter circa 1890s

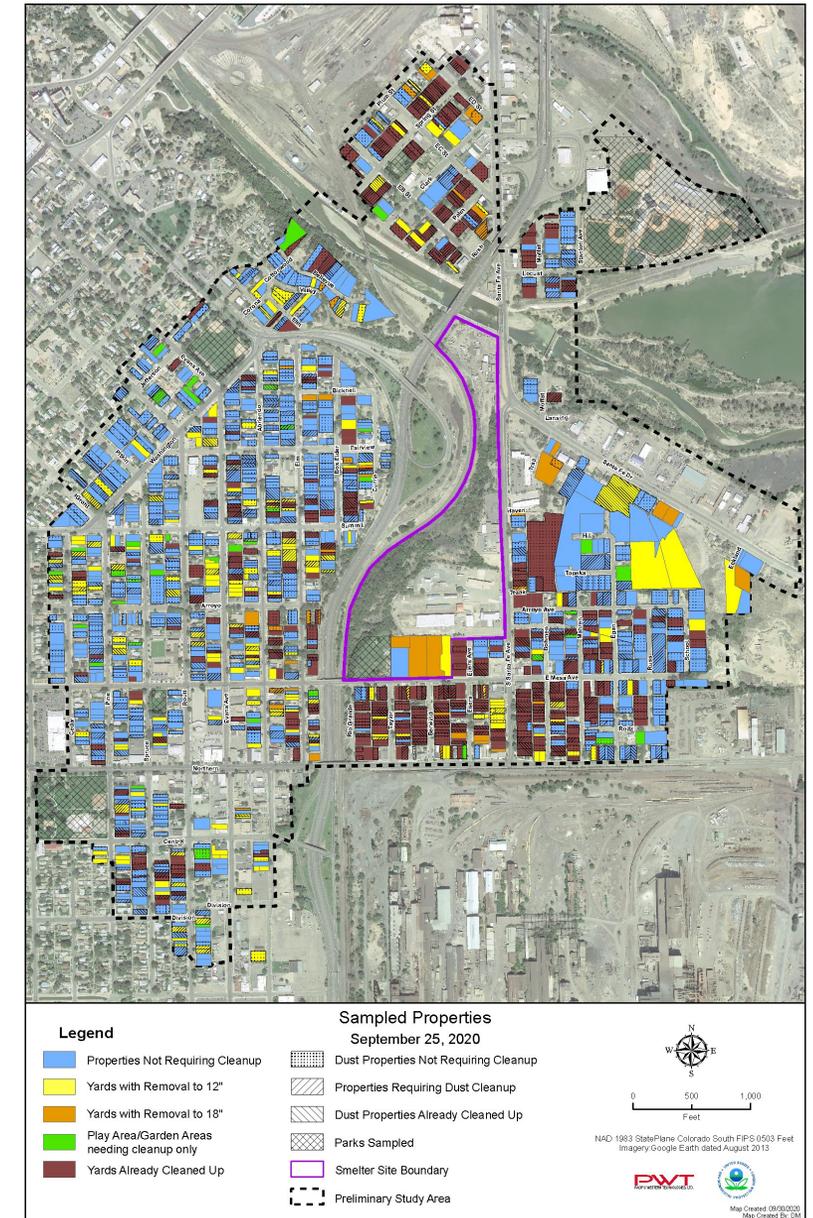
Background (cont)

- Rich immigrant history in surrounding neighborhoods of Grove, Bessemer, and Bojon Town/Eilers
- Flood of 1921 – major impacts to Pueblo
- I-25 built between 1949 and 1959 – divided the neighborhoods
- Mid-2000's - CDOT began the EIS for the I-25 realignment and widening.



Site Structure

- OU1: Community Properties within ½ mile radius of smelter main stack
 - Approximately 1,700 residential parcels in the Bessemer, Eilers, and Grove neighborhoods
 - Approximately 200 non-residential parcels
- OU2: Former smelter area
 - ~45 acres composed of:
 - Building remains
 - 101,000 square ft of slag piles and 107,000 square ft shallow soils overlying slag
 - Several active commercial properties



OU1: Community Properties

Environmental Justice concerns

- Lower income minority population
- 98% of homes - pre-1978 lead paint ban
- 50% rental; many with bare soil yards

Small residential lots - substantial and frequent communication and a lot of handwork during cleanup

Need for concurrent RI/FS and RD/RA

Soil sampling status: 90% complete

Indoor dust sampling status: 60% complete



OU1: Community Properties (cont.)

Soil cleanup status:

- 54% of estimated soil cleanups complete

Indoor dust cleanup status:

- 30% of indoor dust cleanups complete



CO Smelter COVID-19 Timeline



Colorado and Pueblo County declare public health emergencies

March 11th & 13th



CO Smelter halts all field operations

March 17th



Contractors begin drafting resumption plans

March 25th



Sampling and cleanup contractors resume work

March 31st

In September 2020, the cleanup team submitted their COVID-19 compliant resumption plan to the EPA, state and local health departments for review. Increasing COVID-19 cases in Colorado and elsewhere is slowing resumption of this work.

Initial Response

- Daily pre- and post-workday health monitoring for COVID symptoms in sampling and cleanup contractors
- COVID testing for symptomatic crew members (both negative)
- Regular review of CDC & CDPHE guidelines and updates
- Discussion with contractors regarding contingency plans

Work Freeze

Our primary goal: Protect Pueblo residents, contractor teams, EPA & partner agency staff from COVID-19

- Halted all field operation for two weeks
- Contractors began drafting resumption plans
- Plans reviewed by USACE, EPA Division and HQ Management
- CDPHE provides designation of mission-critical work and support of work during the pandemic



Elements of contractor COVID-19 plans

Social distancing during tailgate meetings and cleanups

Mandatory masks; individual coolers

Handwashing stations in the field

Interior sampling & cleanups at vacant properties ONLY

Reliance on phone calls with property owners

Daily health screenings

Rescheduling cleanups if property owners are sick

Modification of work duties for high-risk employees

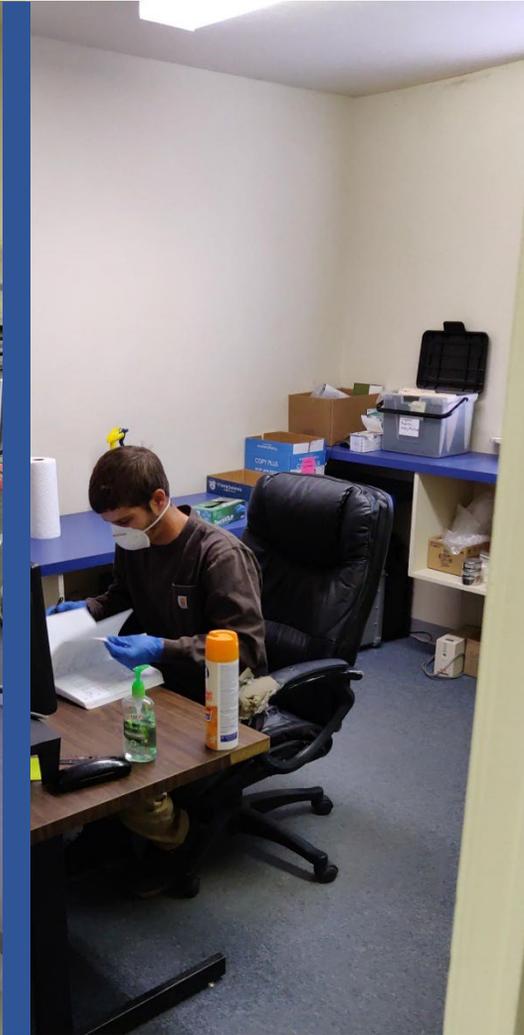


Resumption of work

- Outdoor soil sampling and cleanups resumed after two-week stop
- Daily check in calls for contractors and Agencies through mid-May 2020
- Daily e-check in messages and summaries for EPA management
- Incorporation of evolving PDPHE, CDPHE, and CDC guidance

Our New Normal

- Transition to daily email comms & weekly management updates
- COVID-19 Health and Safety Plan Addenda by contractors and EPA
- Monitoring of PDPHE regulations or state updates
- Review of interior resumption plan for interior cleanups



Accomplishments



- ✓ Continuation of residential cleanups ensuring that we remain on target for our cleanup ups
- ✓ **Zero** COVID-19 cases within contractor crews

What has worked?

- Consistent, open communication with EPA project management, upper management, USACE, our respective contractors, state and local health partners
- Preemptive action and backup plans
- Buy-in and recommendations from state and local health departments
- Continual situation monitoring, comms and plan adjustments



Questions?