

STATE OF COLORADO

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

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November 3, 2004



Colorado Department
of Public Health
and Environment

Ms. Jenny Inge
Mineral County Fairgrounds Association
PO Box 61
Creede, CO 81130

Re: Voluntary Cleanup and Redevelopment Act Application for the Mineral County Fairgrounds Parcel, located at Airport Rd and Highway 149, Creede, Colorado.

Dear Ms. Inge:

The application submitted on behalf of the Mineral County Fairgrounds Association (the applicant) under the Voluntary Cleanup and Redevelopment Act, for the site located at Airport Rd and Highway 149, in Creede, Colorado has been reviewed. The general conclusion is that additional information is necessary to demonstrate whether the cleanup plan is protective of public health and the environment. The following paragraphs explain the issues at this point:

1. The proposed land use is unclear for the parcel. It might be useful to create a figure generally indicating how the site will be built out and cite this as the proposed land use.
2. The cleanup number for lead is proposed as 400 ppm, a level suitable for unrestricted land use. While this level would be considered protective, it may not be feasible. A commercial scenario might be a more appropriate exposure scenario to consider as suitable under the likely land uses planned for this site.
3. The proposed remediation plan does not specify where certain remedial methods will be utilized. Some areas may be appropriate for capping, while others may necessarily be appropriate for phytostabilization/phytoremediation. Please indicate which areas might undergo a specific type of remedial approach.
4. Performance goals should be stated which clearly demonstrate successful remedial efforts. Review of the SPLP data indicates the contamination in the floodplain has the capability of leaching metals. Performance goals indicative of a successful revegetation effort as well as ones which demonstrate the control of further leaching potential will need to be proposed.

At this point in the application process, you may prepare an addendum to the application submitted which would address our questions or you may withdraw your application. Please let us know how you wish to proceed. If you require additional time to prepare a response, you may request an extension to a specific date. The current review period is about to expire. Should you have any questions concerning this letter please feel free to contact me at (303) 692-3449.

Sincerely,

Mark E. Walker

Mark E. Walker

Voluntary Cleanup Program

Cc: Willow Creek Reclamation Committee