

December 2008 Update

Smelertown/Koppers
Salida, Colorado
(Five-Year Review Date: 9/28/2005)

***H**ighlights Since the 2005 Five-Year Review*

- **Maintenance work initiated in May 2006 included removal of shrubs, weeds and sediment from the surface water channel. New riprap was placed inside the north section of the channel and an old silt fence removed.**

Brief Site History: The 120 acre site, located in Chaffee County near the Arkansas River, is about one mile northwest of Salida.

From the turn of the century until about 1920 a lead/zinc smelter operated at the site and dumped wastes along the banks of the Arkansas River. Contaminants include arsenic, cadmium, copper, lead, manganese and zinc.

Beginning in 1924 wood treatment occurred at the site. Creosote and pentachlorophenol were allowed to drip onto the ground after the lumber was treated. Creosote contaminated soils were removed in 1986 and 1992.

The site is divided into two Operable Units (OUs): OU 1-located in the center of the site, includes the former smelter; OU 2-in the western section of the site is where the former wood treating facility was located. A third OU, the former site of CoZinCo, a manufacturer of zinc sulfate soil amendment/animal feed, has been deferred to RCRA for management. OU 3 was removed from the site's proposed NPL listing and is not included in the 5-Year Review.

Cleanup Activities: The remedy required the site's central area smelter wastes and contaminated soil to be consolidated along with creosote contaminated soil from the western area under a two-foot soil cover. The entire consolidation area was then revegetated, fertilized and seeded with native perennial grass and plant species suitable for the region. Groundwater wells were installed down gradient for post construction monitoring.

Current Status: Re-seeding, harrowing, fertilizing and chemical weed control of the consolidated waste pile area was completed on May 10, 2006.

Summary of Protectiveness: The remedy as implemented is currently protective of human health and the environment. Contaminated groundwater associated with OU 1 and OU 2 is not currently used. Soil and smelter wastes containing contaminants above performance standards are isolated from humans through engineering and institutional controls.

Issues Impacting Protectiveness: There is no other information that calls into question the protectiveness of the remedy.

**Smelertown/Koppers
Five-Year Review 2005 Update Table
(Review Date 09/28/2005)**

Issues	Recommendations / Follow-Up Actions	Follow-Up Actions (Status/Due Date)	Status of Follow-Up Actions 12/08	Responsible Party
1) Institutional Controls on land use in OU 1 appear to be in draft form.	Evaluate effectiveness	January 2008	COMPLETE The August 2007 warranty deed and title insurance serve as ICs.	EPA/Colorado Department of Public Health and the Environment (CDPHE)
2) Perimeter fence surrounding OU 1 consolidation requires minor repair.	Repair perimeter fence	December 2005	COMPLETED Fence repaired October 2005	Potentially Responsible Party (PRP)
3) Cadmium regularly detected above groundwater performance standard at OU 1.	Continue monitoring of groundwater quality trends.	January 2008	EPA anticipates issuing an Explanation of Significant Differences (ESD) in 2009 identifying revisions to the remedy.	EPA/CDPHE
4) Detection limit for dibenz(a,h) anthracene is	Modify analytical method to achieve	January 2008	EPA anticipates issuing an	EPA/CDPHE

Issues	Recommendations / Follow-Up Actions	Follow-Up Actions (Status/Due Date)	Status of Follow-Up Actions 12/08	Responsible Party
higher than groundwater monitoring performance standard for OU1.	required detection limit.		ESD in 2009 identifying revisions to the remedy.	
5) Maximum Contaminant Levels for arsenic in OU1 revised downwards from 50 ug/L to 10 ug/L effective January 23, 2006.	Revise groundwater performance standards	January 2008	EPA anticipates issuing an ESD in 2009 identifying revisions to the remedy.	EPA/CDPHE
6) Detection limits and analytical suite for groundwater monitoring at OU 2 are inconsistent with requirements of the Record Of Decision (ROD) and Remedial Work Plans.	Modify analytical method to achieve required detection limits and add missing chemicals to analytical suite.	January 2008	EPA anticipates issuing an ESD in 2009 identifying revisions to the remedy.	PRP
7) Applicable or Relevant and Appropriate Requirements (ARARs) in lieu of risk-based remedial goals for groundwater are inconsistent between OU 1 and OU 2	Remedial goals will be evaluated for groundwater for OU 1 and OU 2.	January 2008	EPA anticipates issuing an ESD in 2009 identifying revisions to the remedy.	EPA/CDPHE
8) Many intake assumptions and toxicity values have been revised by US EPA since completion of the Baseline Risk Assessment.	Assess existing soil chemical data to determine whether remaining contamination poses a health risk above a level of concern.	January 2008	EPA anticipates issuing an ESD in 2009 identifying revisions to the remedy.	EPA/CDPHE
9) The use of a residential scenario for	Evaluate remedial goals for OU 1 and	December 2008	Evaluation will be completed as	EPA/CDPHE

Issues	Recommendations / Follow-Up Actions	Follow- Up Actions (Status/D ue Date)	Status of Follow-Up Actions 12/08	Responsible Party
establishing groundwater performance standards is inconsistent with the use of an acceptable risk level for industrial soils.	OU 2.		part of 2009 ESD.	