

**Draft Meeting Summary
Colorado Smelter Community Advisory Group
Sampling Workgroup Meeting
November 12, 2014**

Note: Please provide corrections or additions to this summary to Kristi at kcelico@gmail.com by no later than January 30, 2015.

On November 12, 2014, a large subgroup of the Colorado Smelter Community Advisory Group (CAG) met at the Steelworkers Center of the West to discuss sampling. An attendance list is included in Attachment A. This summary is not intended as a detailed transcript of the meeting, but rather to highlight the discussions that occurred. It represents a summary of the facilitator's notes and is not intended to state formal EPA policy or decisions.

The meeting was primarily a session for CAG members and others to ask Sabrina Forrest and Charlie Partridge of the EPA about the Agency plans and approach for sampling. The agenda included:

- Overview of consent forms and sampling process
- Question and Answer period
- Input on next steps

Overview on Consent Forms

Sabrina Forrest reported that EPA's contractor, PWT, sent out approximately 2600 letters for 1900 homes in late October. Basically the letter went to all landowners and renters who live within a half-mile of the smelter stack. Some details are still being work out regarding making sure both renters and homeowners have given the EPA consent, but as of 01/05/15, EPA has received the following:

- 361 responders have consented to sampling inside the house AND outside;
- 151 responders have consented to sampling outside the house ONLY;
- 4 responders have consented to sampling inside the house ONLY; and
- 10 responders have REFUSED to provide any consent for sampling on their property.
- About 320 of mail were returned due to various issues, e.g., vacancy, unable to forward, not at this address, etc.

Please note that because consent is necessary from BOTH landowners and any renters of property before sampling can occur, EPA will need to link affirmative responses to the specific piece of property to ensure full consent before sampling.

Overview on Sampling Process

Charlie Partridge, an EPA Superfund Toxicologist, provided a brief overview of the planned sampling process. A more detailed overview will be provided at future CAG meetings. Charlie explained that the primary objective of sampling is to see if contaminants are in the soils at higher than normal/background levels, such that they might present a health threat. Charlie discussed that sampling will be conducted in a way to try to reduce the chance of missing any potential hotspots (i.e, highly contaminated spots). The initial idea is to do 5-point composite sampling on approximately 85 percent of the properties and incremental sampling on approximately 15 percent of the homes and then look at the two data sets to see if there is a good comparison and confidence in this method. He described decision units and that houses’ drip zones will be sampled as separate decision units from the yard areas. It was noted that a layman’s explanation of the sampling process and a better understanding of the “no level of lead is safe” vs. the inability to cleanup to normal/naturally occurring levels was needed. Charlie then described the need to do a “background” study as part of the detailed sampling that is typical in a Remedial Investigation.

EPA’s objective in sampling is to determine if any contaminants from the smelting process can be found in the properties surrounding the smelter. Based on early results, EPA may expand its sampling further in one direction or another. The Agency is primarily looking for lead and arsenic, but initial analyses will include about 20-25 other metals as well because smelter wastes may contain contaminants other than lead and arsenic. EPA is presently developing a Quality Assurance Project Plan (QAPP), which contains the sampling and analysis plan. The plan will look to get a good representation of the different types of houses and ages of houses in the neighborhood. If possible and if the demographic data is available, residences with pregnant or small children present may be given priority in the sampling process.

Typical Quality Assurance Project Plan (QAPP) sections include:

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Typical non-site-specific references include such things as the following. They will not be attached to the QAPP as they are available on the Internet.

FGDC. 1998. *Geospatial Positioning Accuracy Standards. Part 1: Reporting Methodology (FGDC-STD-007.1-1998)*.

USEPA. 1994. *Guidance for the Data Quality Objectives Process (EPA QA/G-4)*. September.

USEPA. 2000. *EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0 formerly 5360 A1)*. May.

USEPA. 2000. *Guidance for Data Quality Assessment, Practical Methods for Data Analysis (EPA QA/G-9), QA00 Update*. July.

USEPA. 2001. *EPA Requirements for Quality Assurance Project Plans*. March.

USEPA. 2002. *EPA Guidance for Quality Assurance Project Plans*. December.

USEPA. 2003. *Superfund Lead-Contaminated Residential Sites Handbook* August 2003.

USEPA. 2005. *National Geospatial Data Policy, CIO Policy Transmittal 05-002. (CIO 05-002)*. August.

USEPA. 2006a. *Guidance on Systematic Planning Using the Data Quality Objectives Process (EPA QA/G-4)*. February.

USEPA. 2006b. *Data Quality Assessment: A Reviewer's Guide (EPA QA/G-9R)*. February.

USEPA. 2006c. *Data Quality Assessment: Statistical Methods for Practitioners (EPA QA/G-9S)*. February.

USEPA. 2008. *National Geospatial Data Policy (CIO 2131.0)*. August.

USEPA. 2009b. *Guidance for Labelling Externally Validated Laboratory Analytical Data for Superfund Use (EPA-540-R-08-005)*. January.

USEPA. 2010. *U.S. EPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review*. EPA 540-R-10-011. January.

USEPA. 2014. *Contract Laboratory Program Guidance for Field Samplers*. EPA 540-R-09-03. October.

Typical Appendices, Figures and Tables

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Although much of the QAPP content will be standard text to be consistent with EPA requirements, guidance, and policy, Charlie suggested that perhaps a small group of CAG members with scientific backgrounds could work with him to provide detailed input. The plan is expected to be between 150 and 200 pages.

Soil Sampling. EPA will conduct a five-point composite in each yard. Sampling is planned to be up to 18 inches in depth, with typical depths being 0-2 inches, 2-6 inches, 6-12 inches, and 12-18 inches below ground surface.

Indoor Dust Sampling. If EPA does not have sufficient houses to sample indoors, the agency will use average national default numbers that are fairly conservative, which may mean lower than site-specific numbers. The EPA prefers to have data specific to the Colorado Smelter site. Sometimes alternate methods are used to collect indoor dust data, but there are too many variables that go along with these alternate methods. Vacuuming is the EPA preferred method.

Dust sampling details will be further developed after the specialized sampling vacuum is received.

Health Department Testing. Homeowners can invite the Pueblo Health Department to conduct lead paint and water sampling to see if the home contains lead plumbing. A different consent agreement will be necessary. The Health Department will provide more information on their plans in the future.

Video. EPA's contractor has developed videos to demonstrate the sampling process. The Workgroup watched the videos demonstrating soil sampling. EPA's contractor is working on an indoor sampling video also. EPA is looking for appropriate ways to get the videos out to the public.

Question and Answer Session

The following section summarizes the main topics discussed at the workgroup meeting.

When will earlier sampling data be available to the public?

Information of **blood lead data** from residents in the area are were summarized and made publicly available by the Pueblo City-County Health Department in a news article by Dr. Nevin Woods. Due to privacy rights, individual or house-by-house blood lead data is unable to be released. However, the Agency for Toxic Substances Disease Registry (ATSDR) will produce a report summarized, detailing and presenting the results from the blood lead exposure investigation.

All sampling of the **waste pile, soil, surface water and sediment** are also publicly available. Sampling has occurred in the Colorado Smelter area by the CDPHE and others. The EPA Colorado Smelter webpage is located at: <http://www2.epa.gov/region8/colorado-smelter>. A general EPA factsheet on this sampling can be found here: <http://www2.epa.gov/sites/production/files/2013-11/documents/cosmelter-sampling-and-cleanup-fs-sep2012.pdf>. Sampling results from 2010 can be found in the Analytical Results Report here: <http://www2.epa.gov/region8/colorado-smelter-analytical-results-report>. Earlier reports are located at: <http://www2.epa.gov/region8/colorado-smelter-earlier-studies>.

Will the homeowner have to pay to have their yard or house sampled or cleaned up?

EPA will pay for sampling cost and cleanup costs related to the smelter. If EPA identifies serious contamination from another source during the sampling process, the property owner could be held responsible for cleaning the property. Sabrina noted she

had not seen a situation where there this has happened in the past and she has worked on a number of smelter sites.

If there is lead-based paint on the outside of the house, will this show up in samples?

Charlie noted that the agency sometimes will find lead-based paint in the drip line along the house. In order to minimize this possibility, the soil samples will be sieved down to remove any possible large paint chips.

Aren't lead and arsenic found naturally in the soil?

Yes. EPA acknowledges that lead and arsenic can be found naturally in some soils. To address this, EPA will take samples of soil in the Pueblo area to determine naturally occurring levels. The agency will not cleanup lower than this naturally occurring background level. Community members noted that there maybe a different level of background in Pueblo's urban area due to other sources, such as lead gas.

How can EPA prevent damage to my property during testing?

The contractor will make a map of each yard prior to beginning sampling, including noting utilities, sprinkler systems, and any other factors. This information is gathered by talking to the homeowner and the utility company. If damage does occur, the contractor will have supplies to fix most problems on the spot, such as a broken sprinkler line.

Is it true that the City is denying access to Benedict Park?

As of January 2015, the EPA and the City's legal counsel are working cooperatively to answer the City's questions about such things as the outline of the preliminary study area, the current vision and timing for the signs and fencing project and the Remedial Investigation sampling, notice and coordination with the city and community about EPA's timing so that disruption to residents is minimized. Updates on this issue will be given to the CAG.

Will you be testing the grass? Some CAG members stressed the importance of testing the grass.

EPA stated that it will not be testing the grass because the lead adheres to soil particles. The living plant parts are usually considered a different sample type and the EPA has found the soil lead levels are more important for seeing what residents could be exposed to. Charlie discussed being able to shake soils off the grass as part of the sampling process for soils.

Will you be testing the alleyways?

EPA will be seeking consent from the City to test the alleyways and other city-owned parcels within the preliminary study area.

How will you separate contamination from the steel mill vs. the smelter?

This will be determined when we have a better picture of where and how much contamination is in the area. There are ways of distinguishing between contributors, but selecting a process will come later if needed.

How did EPA decide who should receive a consent letter?

EPA drew a ½ mile radius from the stack. Based on the early results from sampling, EPA will decide whether it is necessary to expand or contract that circle and if so, in which direction.

Is it true that there is no safe level of lead?

The CDC has said that no level of background is safe. However, humans often determine what is an acceptable level of risk in their day-to-day activities, such as driving a car.

Will EPA be retesting property that was already tested?

Yes, to ensure that we have comparable data, EPA will retest these areas. However the current information helps inform the QAPP/sampling plan.

Instead of doing indoor dust sampling in the attics, could EPA use the special door mats stated in the EPA handout for indoor sampling?

No. The mats that are described in the handbook are no longer manufactured. It turned out the analysis of the mats was very complicated and expensive. And there are better methods available for testing indoors now, anyway.

Next Steps

EPA will provide a report back at the regular CAG meeting regarding discussions with the City of Pueblo and its counsel. The CAG workgroup would like additional information on whether the city will allow testing on its parks and alleys.

Charlie Partridge will meet with Merrill Coomes, Ross Vincent, Tim Hawkins, and Joe Kocman to seek their input on the sampling plan and process. Charlie will take the lead in organizing these meetings.

EPA will put together a couple page fact sheet on the indoor and outdoor sampling process. This information, along with the video, will be broadly disseminated.

At this time, the EPA is not planning to send out additional consent for access to sample letters. EPA plans to share a map of the area where letters were mailed at the next CAG meeting. If EPA sends out additional consent to sample letters beyond the ½ mile marker, the agency will prepare a map for the CAG noting the areas that have received such letters.

Attachment A

Attendance at the November 12 Workgroup Meeting

Adrian Acosta
Mark Acosta
Robert Blazich
Merril Coomes
Sabrina Forrest
Pam Kocman
Jeannine Natterman
Charlie Partridge
Tony Pefalta
Tony Perko
Charlotte Plutt
Dave Talbert
Ross Vincent
David Webb
Chad Wolgram