

---



---

**MEMORANDUM**

---



---

**TO:** LINDSAY MASTERS – COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT, HAZARDOUS MATERIALS & WASTE MANAGEMENT DIVISION

**FROM:** TOM HARP - REMEDIATION RISK REDUCTION, LLC (R<sup>3</sup>)

**SUBJECT:** BI-WEEKLY STATUS UPDATE – THORNTON SHOPPING CENTER, NORTHWEST CORNER 88<sup>TH</sup> AND CORONA, THORNTON, CO – EPA #COR000212639, M&E 3.2, THORNTON LLC (THORNTON SHOPPING CENTER)

**DATE:** 4/7/2021

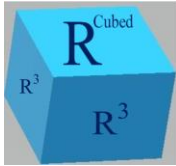
**CC:** THORNTON LLC

---

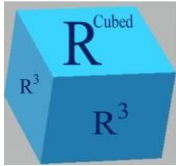
Lindsay;

Per the requirement stipulated in your June 23, 2020 correspondence, the *Bi-Weekly Status Update* for April 7, 2021 regarding the Thornton Shopping Center is as follows:

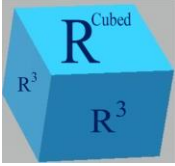
COMPANY/SUB CONTRACTOR	R <sup>3</sup> /Alpine Remediation, Inc.				
BOS 100 <sup>®</sup> INJECTED	BOS 100 <sup>®</sup> VOLUME (lbs.)	DEPTHS	DATE	SLURRY VOLUME (Tgal.)	INJECTION PRESSURE (psig.)
N/A	N/A	N/A	N/A	N/A	N/A
SUPPLEMENTAL SAMPLING	SAMPLES	DATE COLLECTED	DATE OF RESULTS	PCE (µg/L)	Other VOCs (µg/L)
N/A	N/A	N/A	N/A	N/A	N/A
SOLID WASTE GENERATED	NO. OF DRUMS SOIL	NO. OF DRUMS WATER	HAZARDOUS WASTE GENERATED	NO. OF DRUMS SOIL	NO. OF DRUMS WATER
N/A	N/A	N/A	N/A	N/A	N/A



OTHER PLANNED ACTIVITIES	ESTIMATED SCHEDULE	POTENTIAL ROADBLOCK S/ DELAYS			
R <sup>3</sup> ceased Phase I injections in Treatment Area OFS-3 due to refusal issues.	3/3/2021	Need to employ direct-push techniques (as stated in the approved CAP) to complete injections in Treatment Area OFS-3.			
R <sup>3</sup> notifies CDPHE of refusal issues in Treatment Area OFS-3 and explains that pre-drilling is a direct-push technique for such refusal instances and will be used to complete injections in OFS-3.	3/4/2021				
CDPHE requests R <sup>3</sup> to “hold off” using the pre-drilling technique to complete injections in Treatment Area OFS-3.	3/5/2021				
R <sup>3</sup> responds to CDPHE’s questions and information request regarding the direct-push technique of pre-drilling.	3/11/2021				
CDPHE disallows R <sup>3</sup> to use the direct-push technique of pre-drilling to complete Treatment Area OFS-3 but grants a time extension until April 30, 2021 to complete all Phase I injections.	3/23/2021				
R <sup>3</sup> collected the Monthly/First Quarter 2021 groundwater samples, as required by	3/25/2021 – 3/29/2021				



the CDPHE.					
Thornton LLC/R <sup>3</sup> requested a meeting with the CDPHE and the Attorney General's Office (AGO) to discuss further how to proceed to finish injections in Treatment Area OFS-3.	3/31/2021				
Virtual meeting scheduled with Thornton LLC/R <sup>3</sup> , CDPHE and AGO to discuss path forward to complete OFS-3.	4/6/2021				
R <sup>3</sup> will submit a <i>Monthly/First Quarter 2021 Groundwater Monitoring Report</i> to the CDPHE for review and approval.	On or about 4/30/2021				
<p>Thornton LLC is working with Sterling Design design/architectural/surveying team to subdivide the Shopping Center to sell additional parcels to developers.</p> <p>With that in mind, Thornton LLC is in discussion with real estate brokers and multiple potential users for the site to develop a subdivision plan that works more closely with their needs.</p> <p>Thornton LLC is conferring with potential purchasers of the complete Shopping Center; has received one offer and has made a counteroffer.</p>	Ongoing				



<p>Thornton LLC has built a construction fence around the vacant east buildings (8954 – 8988) to protect against vagrants prior to demolition, which is anticipated to occur after remediation of asbestos in the Spring of 2021. Thornton LLC is aware that any remediation will be done by a licensed contractor, per CDPHE requirements. Abatement permit has been obtained; abatement is ongoing.</p> <p>Thornton LLC has had a couple meetings with City of Thornton regarding various options going forward; with next meeting scheduled for Friday, April 9, 2021.</p>					
---	--	--	--	--	--

I will notify you if there are any pending additions/deletions to this update. Please do not hesitate to contact me should you have any questions or require additional information.

Sincerely,

REMEDICATION RISK REDUCTION, LLC

Thomas A. Harp, P.G., M.S.C.E., M.B.A.

Principal