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December 10, 2008

Via Email

Ms. Sheila Gaston
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South, B2
Denver, CO 80246-1530

Re: Waiver of Requirement for Subslab Depressurization
Falcon Point 2, Filing 23
Main Trichloroethene Plume
Operable Unit 5, Former Lowry Air Force Base

Dear Ms. Gaston:

As we discussed at the LCT meeting on November 19, 2008, LAC, on behalf of the Lowry Redevelopment Authority (LRA), is requesting a waiver of the requirement for a subslab depressurization system in Filing 23, Lot 1, Block 1 (the parcel), bounded by Lowry Boulevard, Golfer's Way, Denver Indian Center and Third Way (Figure 1) which will be the location of the Falcon Point 2 Development. Approximately 50 feet of the westernmost portion of the property falls within the Finding of Suitability for Early Transfer (FOSET) Parcel 4B and has the associated requirement for a subslab depressurization system. Based on a review of the groundwater data in the area, the Main Trichloroethene (TCE) Plume is not present in this parcel. The historical boundary was apparently drawn based on a single data point, which was subsequently resampled and did not have any contaminants of concern (COCs) above the applicable State groundwater standards. Based on additional data collected since that time, which are presented below, LAC requests this waiver

The FOSET boundary (Figure 1) was based on groundwater data collected prior to the 2003 Plume Boundary Refinement Program (Versar, 2003). The boundary is drawn to the east of the current Golfer's Way in the parcel, based on data point A-8, sampled in 1994 (Figure 2). At that time it had a detected TCE concentration of 24.2 micrograms per liter (ug/L) (Table 1). The other analytes in the 1994 sample from A-8 were below applicable CDPHE groundwater standards. A-8 was resampled in June 2003 and the TCE result was non-detect at a reporting limit of 1.0 ug/L, as were the results for all other chlorinated solvent compounds. The single detection in the sample was acetone at 2.8 ug/L which is below the applicable State standard. Well MWWCP04, also located in the parcel, was previously abandoned to facilitate redevelopment with the approval of the Colorado Department of Public Health and Environment (CDPHE) because concentrations of COCs were below CDPHE standards.

In addition, LAC performed extensive sampling for TCE throughout Filing 23 in the fall of 2007. Six data points are available in the parcel to the west of Golfer's Way, defining the plume boundary (Figure 1); the two easternmost samples collected from the western side of Golfer's Way (TWLRA-002A and TWLRA-003A) had TCE concentrations of no greater than 5 ug/L.



These data effectively delineate the eastern plume boundary within the segment of Filing 23 to the west of Golfer's Way. Additionally, data from well MWWCP02, located just south of Lowry Blvd, and temporary well TWLRA-001A indicate that the Main TCE Plume is centered on well MWWCP02. TCE concentrations in that well have fallen from a high of 730 ug/L in 1996 to 28 ug/L, as measured in July 2008.

Based on the data presented herein, the Main TCE Plume is not present on the Falcon Point 2, Filing 23 parcel (Figure 1). Therefore, the LAC requests, on behalf of the LRA, that the CDPHE waive the requirement for a subslab depressurization system for Filing 23, Lot 1, Block 1.

If you have any questions regarding this letter, please call me at (303) 972-6633.

Sincerely,
Lowry Assumption, LLC

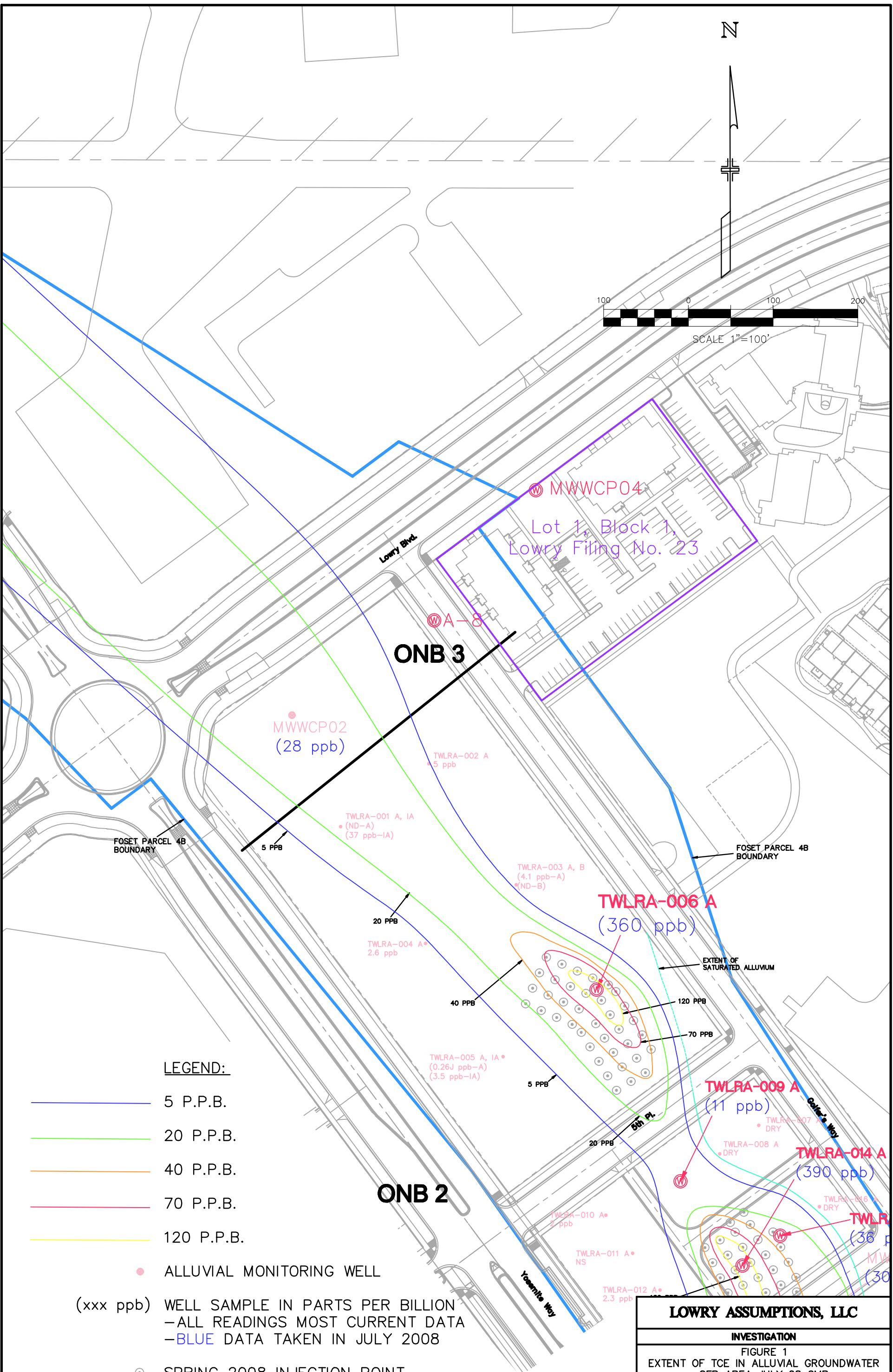
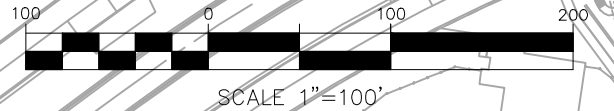
A handwritten signature in blue ink, appearing to read "Elizabeth Sopher", is written over a light blue horizontal line.

Elizabeth Sopher
Senior Project Manager

Enclosures

cc: Joe Aiken – LAC
Tom Berger - LRA
David Erickson - Denver DEH
Monty Force - LRA
Karen Hancock - Aurora
Stanley Pehl – AFCEE
Roger Pennifill - AIG
Pat Smith - EPA Region 8
Ann Wei - IRGLowry Project File

N



LEGEND:

- 5 P.P.B.
- 20 P.P.B.
- 40 P.P.B.
- 70 P.P.B.
- 120 P.P.B.

● ALLUVIAL MONITORING WELL

(xxx ppb) WELL SAMPLE IN PARTS PER BILLION
— ALL READINGS MOST CURRENT DATA
— BLUE DATA TAKEN IN JULY 2008

⊙ SPRING 2008 INJECTION POINT

LOWRY ASSUMPTIONS, LLC

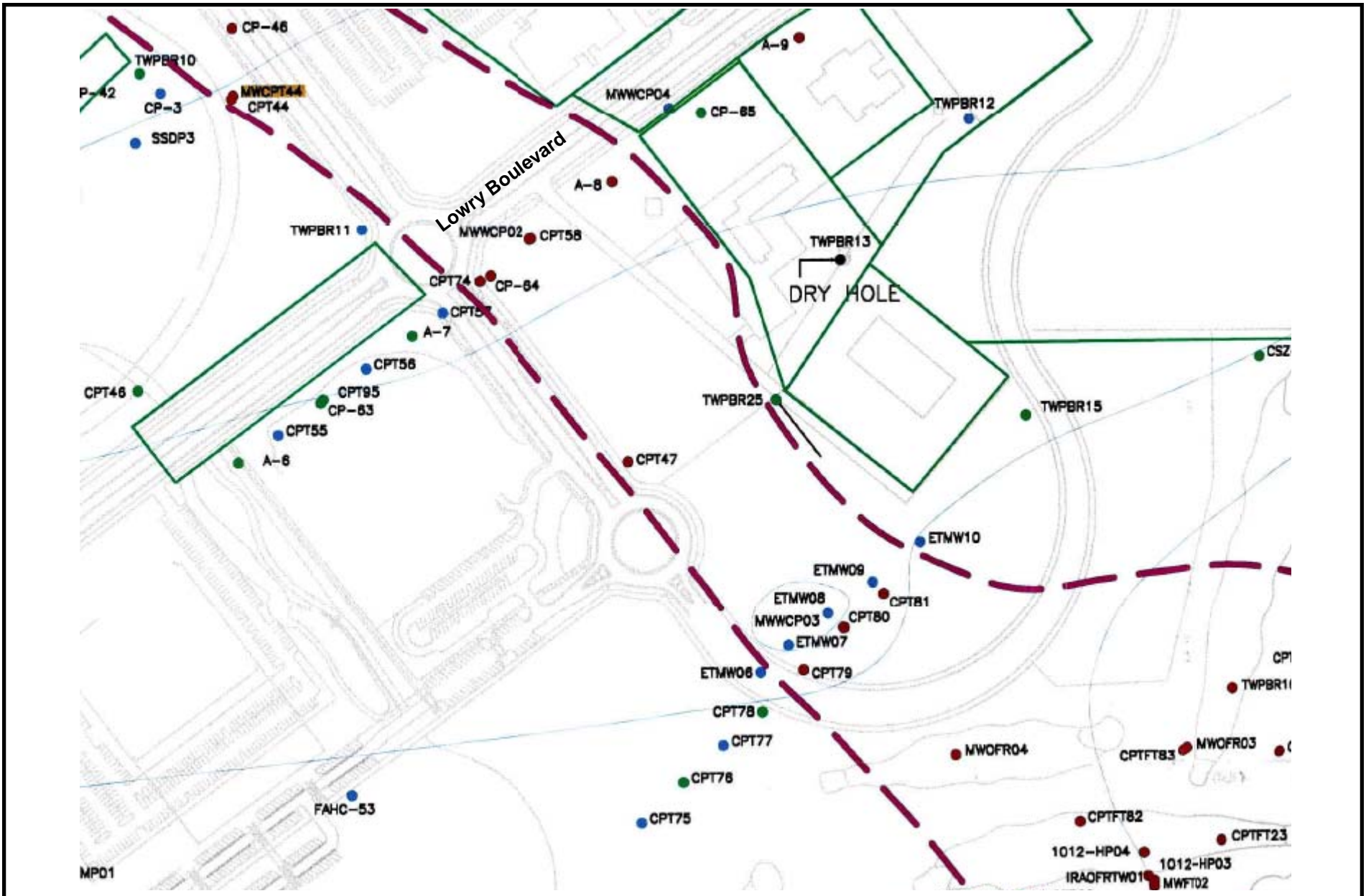
INVESTIGATION

FIGURE 1
EXTENT OF TCE IN ALLUVIAL GROUNDWATER
OFR AREA JULY 08 GMP

DESIGNED BY: ADJ	SCALE: 1"=100'	DATE ISSUED: JULY 2008
DRAWN BY: JKB	HORIZ: N/A	SHEET NO. 1 OF 1 SHEETS
CHECKED BY:	VERT: N/A	

SH1





Source: Final Plume Boundary Refinement Program, Versar 2003

Plume Boundary Refinement Results
 Figure 2
 Falcon Point 2, Waiver Request
 Lowry Assumption, LLC
 December 2008

Table 1
Groundwater Sampling Results
A-8

Site ID	Parameter	Sample Date	Result	Qualifier	Units
Sample Date: 12/28/94					
A-8	DCE11	12/28/1994	3.708	=J	UG/L
A-8	DCE12C	12/28/1994	0	<	UG/L
A-8	DCE12T	12/28/1994	6	=	UG/L
A-8	PCE	12/28/1994	3.515	=J	UG/L
A-8	TCA111	12/28/1994	0	<	UG/L
A-8	TCE	12/28/1994	24.2	=	UG/L
A-8	VC	12/28/1994	0	<	UG/L
Sample Date: 6/25/03					
A-8	1,1,1,2-TETRACHLOROETHANE	6/25/2003	1	U	UG/L
A-8	1,1,1-TRICHLOROETHANE	6/25/2003	1	U	UG/L
A-8	1,1,2,2-TETRACHLOROETHANE	6/25/2003	1	U	UG/L
A-8	1,1,2-trichloro-1,2,2-trifluoroethane	6/25/2003	1	U	UG/L
A-8	1,1,2-TRICHLOROETHANE	6/25/2003	1	U	UG/L
A-8	1,1-DICHLOROETHANE	6/25/2003	1	U	UG/L
A-8	1,1-DICHLOROETHENE	6/25/2003	1	U	UG/L
A-8	1,1-DICHLOROPROPENE	6/25/2003	1	U	UG/L
A-8	1,2,3-TRICHLOROBENZENE	6/25/2003	1	U	UG/L
A-8	1,2,3-TRICHLOROPROPANE	6/25/2003	1	U	UG/L
A-8	1,2,4-TRICHLOROBENZENE	6/25/2003	1	U	UG/L
A-8	1,2,4-TRIMETHYLBENZENE	6/25/2003	1	U	UG/L
A-8	1,2-DIBROMO-3-CHLOROPROPANE	6/25/2003	2	U	UG/L
A-8	1,2-DIBROMOETHANE	6/25/2003	1	U	UG/L
A-8	1,2-DICHLOROBENZENE	6/25/2003	1	U	UG/L
A-8	1,2-DICHLOROETHANE	6/25/2003	1	U	UG/L
A-8	1,2-DICHLOROPROPANE	6/25/2003	1	U	UG/L
A-8	1,3,5-TRIMETHYLBENZENE	6/25/2003	1	U	UG/L
A-8	1,3-DICHLOROBENZENE	6/25/2003	1	U	UG/L
A-8	1,3-DICHLOROPROPANE	6/25/2003	1	U	UG/L
A-8	1,4-DICHLOROBENZENE	6/25/2003	1	U	UG/L
A-8	1-CHLOROHEXANE	6/25/2003	1	U	UG/L
A-8	2,2-DICHLOROPROPANE	6/25/2003	1	U	UG/L
A-8	2-BUTANONE	6/25/2003	10	U	UG/L
A-8	2-CHLOROTOLUENE	6/25/2003	1	U	UG/L
A-8	2-HEXANONE	6/25/2003	10	U	UG/L
A-8	4-CHLOROTOLUENE	6/25/2003	1	U	UG/L
A-8	4-METHYL-2-PENTANONE	6/25/2003	10	U	UG/L
A-8	ACETONE	6/25/2003	2.8	J	UG/L
A-8	BENZENE	6/25/2003	1	U	UG/L
A-8	BROMOBENZENE	6/25/2003	1	U	UG/L
A-8	BROMOCHLOROMETHANE	6/25/2003	1	U	UG/L
A-8	BROMODICHLOROMETHANE	6/25/2003	1	U	UG/L
A-8	BROMOFORM	6/25/2003	1	U	UG/L
A-8	BROMOMETHANE	6/25/2003	1	U	UG/L
A-8	CARBON DISULFIDE	6/25/2003	1	U	UG/L
A-8	CARBON TETRACHLORIDE	6/25/2003	1	U	UG/L
A-8	CHLOROBENZENE	6/25/2003	1	U	UG/L
A-8	CHLOROETHANE	6/25/2003	1	U	UG/L
A-8	CHLOROFORM	6/25/2003	1	U	UG/L
A-8	CHLOROMETHANE	6/25/2003	1	U	UG/L
A-8	CIS-1,2-DICHLOROETHENE	6/25/2003	1	U	UG/L

Table 1
Groundwater Sampling Results
A-8

A-8	CIS-1,3-DICHLOROPROPENE	6/25/2003	1	U	UG/L
A-8	DIBROMOCHLOROMETHANE	6/25/2003	1	U	UG/L
A-8	DIBROMOMETHANE	6/25/2003	1	U	UG/L
A-8	DICHLORODIFLUOROMETHANE	6/25/2003	1	U	UG/L
A-8	ETHYLBENZENE	6/25/2003	1	U	UG/L
A-8	HEXACHLOROBUTADIENE	6/25/2003	1	U	UG/L
A-8	IODOMETHANE	6/25/2003	1	U	UG/L
A-8	ISOPROPYLBENZENE	6/25/2003	1	U	UG/L
A-8	M+P-XYLENE	6/25/2003	1	U	UG/L
A-8	methyl t-butyl ether	6/25/2003	1	U	UG/L
A-8	METHYLENE CHLORIDE	6/25/2003	1	U	UG/L
A-8	NAPHTHALENE	6/25/2003	1	U	UG/L
A-8	N-BUTYLBENZENE	6/25/2003	1	U	UG/L
A-8	N-PROPYLBENZENE	6/25/2003	1	U	UG/L
A-8	O-XYLENE	6/25/2003	1	U	UG/L
A-8	P-ISOPROPYLTOLUENE	6/25/2003	1	U	UG/L
A-8	SEC-BUTYLBENZENE	6/25/2003	1	U	UG/L
A-8	STYRENE	6/25/2003	1	U	UG/L
A-8	TERT-BUTYLBENZENE	6/25/2003	1	U	UG/L
A-8	TETRACHLOROETHENE	6/25/2003	1	U	UG/L
A-8	TOLUENE	6/25/2003	1	U	UG/L
A-8	TRANS-1,2-DICHLOROETHENE	6/25/2003	1	U	UG/L
A-8	TRANS-1,3-DICHLOROPROPENE	6/25/2003	1	U	UG/L
A-8	TRICHLOROETHENE	6/25/2003	1	U	UG/L
A-8	TRICHLOROFLUOROMETHANE	6/25/2003	1	U	UG/L
A-8	VINYL ACETATE	6/25/2003	1	U	UG/L
A-8	VINYL CHLORIDE	6/25/2003	1	U	UG/L