



R08-26-C-004

**Brownfield Cleanup Grant Application – Application Information Sheet**  
***Bullock Electric Steam Plant – Montrose, CO***

**4.B.1. Applicant Identification**

City of Montrose  
400 E Main St  
Montrose, CO 81403

**4.B.2 Website URL**

<https://www.cityofmontrose.org/>

**4.B.3. Funding Requested**

**4.B.3.a. Grant Type**

Grant Type: Single Site Cleanup

**4.B.3.b. Federal Funds Requested**

Funds Requested: \$3,327,850

**4.B.4. Location**

Montrose, Montrose County, Colorado

**4.B.5. Property Information**

Site Name: Bullock Electric Steam Plant  
Address: 30 W South 4th Street, Montrose Colorado 81401

**4.B.6. Contacts**

**4.B.6.a. Project Director**

Name: Jace Hochwalt, Community Development Director  
Ph: 970-240-1478  
E: [jhochwalt@ci.montrose.co.us](mailto:jhochwalt@ci.montrose.co.us)  
Mailing Address: 400 E Main St, Montrose, CO 81401

**4.B.6.b. Chief Executive/Highest Ranking Elected Official**

Name: Dave Frank, Mayor of Montrose  
Ph: 970-252-4803  
E: [dfrank@cityofmontrose.org](mailto:dfrank@cityofmontrose.org)  
Mailing Address: 400 E Main St, Montrose, CO 81401

#### 4.B.7. Population

20,291 (2020 Census)

#### 4.B.8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The proposed site(s) is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	5
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	3,4,5
The proposed site(s) is in a federally designated flood plain.	4
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	5
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	5
The proposed project will improve local climate adaptation mitigation capacity and resilience to protect residents and community investments.	4,5
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	3

#### 4.B.9. Releasing Copies of Applications

The City does not have any Confidential Business Information (CBI) or trade secrets disclosed in this application.

#### **4.C. Narrative Criteria 4.C.1. Project Area Description and Plans for Revitalization; Target Area and Brownfields; 4.C.1.a. Overview of Brownfield Challenges and Description of Target Area**

Montrose, Colorado, a city of 20,291 residents, located in southwestern Colorado, serves as the gateway to some of the region's most iconic outdoor destinations, including Telluride, Black Canyon of the Gunnison National Park, and Blue Mesa Reservoir. Surrounded by breathtaking natural beauty, Montrose is ideally situated to capitalize on its recreation-based economy. However, beneath the city's scenic setting lies a more complex reality shaped by its industrial past.

Once a vibrant railroad, cattle, and mining hub, Montrose's industrial prosperity has left behind a legacy of contamination. As industries declined, numerous sites were abandoned and neglected, becoming brownfields that now obstruct the city's redevelopment efforts. These contaminated properties hamper economic growth, limit access to essential services, and impede efforts to reconnect surrounding neighborhoods.

A key site in this legacy is the former Bullock Plant (the Site), a 4-story power generation building situated on over five acres adjacent to the Uncompahgre River. The Site, like many others in the area, is contaminated and poses challenges to redevelopment.

The Target Area for this grant encompasses a critical portion of downtown Montrose, former industrial lands along the river. This area, defined by Census Block Groups 080859666012, 080859664023, 080859663011, and 080859663023, is a narrow corridor bounded by the railroad to the east and the river to the west. It was once the center of railroad activity supporting mining operations, including a former radium sampler mill. Today, it is home to dilapidated industrial sites, aging commercial buildings, vacant homes, and fragmented infrastructure, all of which contribute to the ongoing challenge of revitalizing this area.

The revitalization of this Target Area, starting with the Bullock Power Plant, is critical not only for environmental health but also for driving economic development. By addressing contamination, improving connectivity, and unlocking underutilized land, the redevelopment of the Site as a climbing gym and recreational hub will attract recreational tourists, create full-time jobs, strengthen economic vitality within the City and Target Area, and encourage additional like-minded businesses to locate in the Target Area.

#### **4.C.1.b Description of the Proposed Brownfield Site(s)**

The former Bullock Plant, an historic steam electric facility, operated from 1953 to 1983. Located at 30 W South 4th St, Montrose (Parcel ID# 3767-331-16-001), the 5.54-acre site includes a 4-story power generation building and a half-acre cooling pond. The site is directly adjacent to the Uncompahgre River and across from the Uncompahgre Riverway Trail. The building, originally coal-fired and later converted to natural gas, has been exposed to the elements and deteriorated since its shutdown in 1983. Prolonged vacancy and limited oversight over several decades have made the site susceptible to illegal dumping and intermittent vagrancy-related activities. The City of Montrose purchased the property on October 12, 2021, and has since secured the building, although it still retains a post-Chernobyl like appearance throughout. An initial Phase I Environmental Site Assessment (ESA), conducted in 1992, indicated that bottom ash and fly ash were disposed of on-site in the former cooling pond from 1950 to 1977.

Various Phase I, Phase II, and hazardous building materials surveys over the years identified primary contaminants of concern in soil including Resource Conservation and Recovery Act (RCRA) metals, volatile organic compounds (VOCs), and polycyclic aromatic hydrocarbons (PAHs). Sampling delineated a fly ash disposal area in the southwest portion of the Site, with deposits covering nearly the entire western half of the property and extending from the former cooling pond to the southern property boundary, totaling approximately 20,000 cubic yards. Groundwater sampling indicated no significant contaminant leaching to shallow groundwater; therefore, groundwater remediation is not required. Concrete chip samples collected within the structure contained low levels of polychlorinated biphenyls (PCBs).

Regulated Building Materials (RBM) survey findings resulted in a Colorado Department of Public Health and Environment (CDPHE) "Major Spill" notification for asbestos on March 20, 2024. The asbestos spill occurred prior to the City of Montrose's acquisition of the site and affected both interior building areas and surrounding exterior areas. This notification is a compliance action and is not subject to enforcement, and the City will coordinate with CDPHE to address the matter during cleanup activities. Approximately 450 feet south of the Site

is a full-time outdoor school serving preschool through middle school students and staff; prior to site security measures, the asbestos release may have posed a potential exposure risk.

The Site remains an attractive nuisance for unhoused individuals encamped along the river and for school-age children and young adults who have accessed or vandalized the property. Additional environmental concerns include the potential runoff of contaminated soils and fly ash into the Uncompahgre River, a listed 303(d) impaired waterbody and FEMA regulatory floodway, which could adversely affect aquatic habitat and recreational uses such as kayaking and paddleboarding.

#### **Revitalization of the Target Area; 4.C.1.c. Reuse Strategy and Alignment with Revitalization Plans**

Since the 1970s, the City of Montrose has strategically acquired and guided redevelopment of downtown and riverfront properties, including parcels located fully or partially within the federally designated FEMA floodplain (including the Site), to protect natural resources while supporting resilient, appropriate reuse. After an 11-year effort, the City acquired the former Bullock Steam Plant and developed a reuse strategy consistent with the *Envision 2040 Comprehensive Plan* (adopted 2021), the *Uncompahgre River Master Plan* (adopted 2011), and other adopted land use and revitalization policies. These plans prioritize remediation of legacy industrial sites, restoration of the river corridor, improved connectivity, and the promotion of local economic growth and redevelopment.

The Site's reuse strategy directly addresses the challenge of legacy contamination and physical isolation that have discouraged reinvestment, constrained local economic activity, and limited access to employment and services. The Site is located within a critical segment of the Uncompahgre River Corridor and partially lies within a FEMA regulatory floodplain, requiring redevelopment that is flood-resilient, environmentally responsible, and publicly beneficial. The climbing gym and recreational hub reuse concept was developed through a community visioning process that began in 2015 and remains active. Continued engagement with residents, regional recreation outfitters, educators, and public agency partners has shaped the evolution of the concept. Technical assistance provided through EPA's Land Revitalization Technical Assistance (LRTA) and the Kansas State University Technical Assistance to Brownfields (KSU-TAB) programs has supported evaluation of redevelopment options, environmental considerations, sustainable reuse strategies, and community engagement.

Following environmental cleanup, the City will retain ownership and redevelop the Site for both public and private uses. The former power plant building will be adaptively reused as a multi-level indoor climbing gym to support year-round recreation, job creation, and private reinvestment. Site improvements will restore riparian habitat, create flood-resilient green space, establish public river access for kayaking and fishing, reconnect the Site to the Uncompahgre Riverway Trail and City park system, and incorporate sustainable energy features where feasible. Proximity to Outdoor Range, a public school focused on hands-on, nature-based learning, will enable indoor recreation and STEM learning opportunities. Collectively, this reuse strategy transforms a contaminated, floodplain-constrained site into a connected economic and community asset that advances adopted plans, reflects community priorities, and catalyzes reinvestment in surrounding neighborhoods.

#### **4.C.1.d. Outcomes and Benefits of Reuse Strategy**

This project will transform the Site from a long-blighted property into a mixed-use, economically productive, and publicly valuable asset. Redevelopment is expected to create up to 30 permanent jobs, with additional employment during remediation, infrastructure improvements, and construction, while stimulating local business activity and expanding the municipal tax base. Currently, the Site generates no tax revenue, compared to similar redeveloped properties, demonstrating the potential for substantial fiscal and economic impact. Its redevelopment is expected to act as a catalyst for further investment in the surrounding Target Area, encouraging private developers to pursue adjacent underutilized or brownfield properties for commercial, residential, or recreational uses, ultimately strengthening the local economy and revitalizing the neighborhood.

The project will also add approximately five acres of usable green space along the Uncompahgre River, including recontoured pond areas, river access points, trails, and riparian habitat improvements. These enhancements stabilize the floodplain, slow stormwater runoff, increase infiltration, and reduce flood risk for adjacent properties, improving community resilience to extreme weather. Reconnecting the Site to

neighborhoods, greenways, and the Riverway Trail expands public access to recreational and educational opportunities, while adaptive reuse of the former power plant as a multi-level climbing gym further stimulates economic activity and attracts visitors and potential investors to the area.

Sustainable energy will be incorporated through solar panels on the building roof and energy-efficient, climate-resilient design. Combined, these interventions advance the City’s goals of stimulating reinvestment, expanding the tax base, creating jobs, and providing accessible greenspace and recreational opportunities, while positioning the Site as a vibrant community and economic hub that encourages broader redevelopment in the surrounding Target Area.

**Strategy for Leveraging Resources; 4.C.1.e. Resources Needed for Site Characterization**

No additional funding is anticipated to be needed as a characterization service grant was awarded in 2024. If needed, the Colorado Department of Public Health and Environment (CDPHE), Targeted Brownfield Assessment (TBA) Fund, or City of Montrose General Fund would be leveraged.

**4.C.1.f. Resources Needed for Site Remediation**

EPA funding being requested in this application is enough to complete the remediation of the Site. However, if additional funding is needed, the City will pursue grant funding through CDPHE’s 1306 grant program, state brownfield remediation tax credits, and potential revolving loan fund financing. The City may also allocate resources from its General Fund as needed to ensure completion of remediation activities and to maintain project momentum.

**4.C.1.g. Resources Needed for Site Reuse**

The City has a long and successful history of working with project partners and intends to utilize a wide array of funding mechanisms for promoting site reuse, including private investment from third-party developers for site infrastructure and development. The City also implemented a successful Tax Increment Financing (TIF) District (Montrose Urban Renewal Authority) for the nearby Colorado Outdoors development and intend to replicate that process here. As part of this strategy, the City may evaluate incorporating the Site into the Montrose Urban Renewal Authority boundary to support redevelopment and long-term financial sustainability.

**Resources Needed for Site Characterization, Remediation, and Reuse**

Name of Resource	Is the Resource for (1.e.) Assessment, (1.f.) Remediation, or (1.g.) Reuse Activities?	Secured or Unsecured?	Additional Details
CDPHE TBA Fund	1.e.	Unsecured	Not anticipated to be needed.
City of Montrose General Fund	1.f. and 1.g.	Unsecured	Contingency for remediation and reuse cost overruns.
Urban Renewal Authority - TIF	1.g.	Unsecured	Being explored to promote economic revitalization of the area and address blight.
Great Outdoors Colorado (GOCO) Grants	1.g.	Unsecured	For possible trail and park connections via pedestrian bridge over the river.

**4.C.1.h. Use of Existing Infrastructure**

The Site has sufficient infrastructure to support the planned redevelopment. Remedial activities and construction will make use of existing roads, sanitary and storm sewers, municipal water, electricity, cable, and gas lines. The Uncompahgre River Trail, a 14-mile Starburst Award-winning bike and pedestrian path, connects recreational areas such as Cerise Park, the Montrose Rotary Amphitheater, and the Montrose Recreation Center, primarily along the west side of the river. This project will extend the trail to the east side of the river with a new pedestrian bridge, creating a safe route to school for children attending the Outer Range school immediately adjacent to the south of the Site and enhancing overall community connectivity.

**4.C.2 Community Need and Community Engagement; Community Need; 4.C.2.a. The Community's Need for Funding**

Montrose is a small, low-income community that cannot independently fund the complex environmental assessment, remediation, and redevelopment work required at the Site. A low-wage area, the City faces rising

property costs that have worsened affordability: in 2023, 74% of residents were either unable to afford a home or were severely cost-burdened (Montrose Housing Needs Assessment, 2023). With a population of just over 20,000, the City lacks access to alternative funding sources for expensive brownfield cleanup and reuse projects.

The City's budget relies almost entirely on seasonal sales tax and is focused on essential services, leaving little capacity for non-essential projects like brownfield remediation. Infrastructure needs exceed \$40 million, including century-old sewer systems. Montrose has also experienced major job losses due to the closure of nearby coal-fired power plants and mines. Tri-State Generation, a 100-megawatt coal-fired station, and its adjacent mining operation closed in 2019, reducing employment from 472 to just 8 workers. The nearby New Horizon Mine has also ceased operations and is undergoing reclamation. The Denver Post highlighted that these closures have "devastating effects" on rural Colorado communities like Montrose. While the unemployment rate remains low at 3.8% (September 2025, data.rgj.com), the loss of high-wage and long-term mining and energy jobs has shifted the local economy toward outdoor recreation- and tourism-based industries, which are highly variable based on the time of year and overall economic conditions. This switch continues to exacerbate fiscal strain in the City and limit resources for redevelopment.

According to the 2022 Census Estimates, poverty in Montrose (13%) exceeds state (9.3%) and national (12.5%) averages, and median household income (\$60,132) is far below Colorado's (\$92,911). Combined with the legacy contamination and physical isolation of the Site, which have discouraged reinvestment, constrained local economic activity, and limited access to employment and services, federal support through this grant is essential. It will enable Montrose to remediate the Site, revitalize the Target Area, and create economic, recreational, and community opportunities that the City could not achieve on its own.

#### **4.C.2.b. Health or Welfare of Sensitive Populations**

The Site poses significant health risks to sensitive populations in the Target Area, where vulnerable residents live, learn, and recreate in close proximity to known environmental hazards. The Montrose County School District's Outer Range School, located immediately adjacent to the Site, primarily serves preschool-aged children, heightening concern for early childhood exposure.

The Site contains asbestos, heavy metals, fly ash, and other contaminants classified as carcinogens or linked to neurological, developmental, reproductive, and respiratory health effects. Seniors, infants, and school-aged children, who make up a substantial portion of the surrounding community, are particularly vulnerable to these exposures. According to the 2022 Census, seniors comprise 23% of the target area population, compared to 16% statewide, and 28% of residents are Hispanic, exceeding the state average of 21%. Fly ash in Site soils contains heavy metals that increase the risk of cancer and respiratory disease, while air quality concerns, asthma prevalence, and lead and asbestos exposure are elevated due to historic structures and past industrial activity.

Contaminants from the Site also pose risks to surface water quality. Runoff and soil migration could further impair the Uncompahgre River, a 303(d) listed waterway, degrading fish and waterfowl habitat and increasing exposure risks for residents and visitors. These environmental hazards not only threaten public health but also limit recreational use and economic activity along the river corridor.

Underlying health and socioeconomic conditions compound these risks. The 2023 Colorado County Health Rankings indicate that Montrose County experiences poorer health outcomes than the state overall: 13% of adults are uninsured (compared to 9% statewide), and 15% of children live in poverty (versus 11% statewide). The community also faces limited access to healthy food and safe places for physical activity. Montrose is a USDA-designated food desert, and much of the city, including the Target Area, is classified as both Low Income (LI) and Low Access (LA). These factors contribute to higher rates of obesity, diabetes, and chronic disease, which are exacerbated by exposure to environmental contaminants.

The proposed cleanup and reuse strategy will directly reduce exposure risks for nearby residents, students, and workers by remediating contaminated soils and removing asbestos and other hazards. Restoring the riparian corridor, creating safe and accessible green space, and adaptively reusing the former power plant will improve public health, expand educational and recreational opportunities, and support renewed economic activity in the Target Area.

#### **4.C.2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions**

The Site contains asbestos, heavy metals, PAHs, VOCs, fly ash, and other pollutants associated with cancer, respiratory disease, birth defects, and developmental disorders. Exposure occurs via direct contact, inhalation of airborne particles, soil ingestion, and potential runoff to the Uncompahgre River, a 303(d) listed waterway, threatening both human and ecological health (EPA, 303(d) List, 2023). Adult cancer incidence is in the 98th percentile statewide, highlighting long-term impacts of legacy contamination (CDC, 2023). Childhood lead exposure is extremely high, with 9.58% of children exceeding 3.5 micrograms per deciliter, the highest in Colorado (CDPHE, 2014). Asthma, obesity, diabetes, and other chronic conditions are prevalent, with 26 percent of adults and 7.1% of preschoolers being obese, 7.9% of residents diagnosed with diabetes, and physical inactivity affecting 21% of adults compared to 17% statewide (NIH, 2023; County Health Rankings, 2023). Furthermore, according to the EnviroScreen tool supported by CDPHE the Site census block 080859664023 has an asthma rate of 18.99 which is higher than 26.55% of Colorado. The heart disease rate is 76.83 which is 81.94% higher than other Colorado census blocks, and the low birth rate is 9.60 which is 56.51% lower than other Colorado census blocks.

Prior to securing the building, contaminants posed direct risks to the adjacent Outer Range school, which primarily serves preschool-aged children. The proposed cleanup and redevelopment strategy directly addresses these risks. Soil capping and removal of asbestos will eliminate exposure pathways and trails and recreational amenities will promote physical activity and reduce chronic disease risk. By removing hazardous substances, mitigating airborne pollutants, and restoring safe access, the project will reduce cancer, asthma, and birth defect risks for sensitive populations while supporting long-term community health and economic revitalization.

#### **4.C.2.d. Economically Impoverished/Disproportionately Impacted Populations**

Montrose County faces significant economic challenges, with 8.3% of families living below the poverty line, and 52% of students eligible for free or reduced-price lunch. School funding is \$3,161 per student below the amount needed to support average U.S. test scores (countyhealthrankings.org). These economic struggles are compounded by the legacy of industrial contamination in the Target Area, which has hindered reinvestment, stunted local economic growth, and limited access to essential services for surrounding neighborhoods.

The central challenge is overcoming the impacts of legacy contamination and physical isolation, which have restricted economic activity and exacerbated health disparities. Vulnerable populations, especially low-income families, children, and seniors, face heightened exposure to harmful pollutants, including asbestos, heavy metals, and fly ash, which further limit their opportunities for economic and social mobility.

The proposed redevelopment will address these issues by remediating the Site and removing environmental hazards. New walking and biking pathways will connect the Site and Target Area to essential services, while greenspace and safer routes to schools will improve public health and attract reinvestment. Over the long term, the project will provide economic opportunities, enhance community well-being, and foster sustainable growth.

#### **Community Engagement; 4.C.2.e. Project Involvement**

The City recognizes the importance of engaging multiple authorities, agencies, and community groups, with particular attention to vulnerable populations. Through two prior USEPA Assessment Grants, the City established a Brownfield Advisory Committee (BAC), which has been reactivated with many original members and will continue to meet as needed to review project plans, financial updates, and community engagement strategies. In addition, City leadership formed a Development and Revitalization Team (DART), composed of local business owners and representatives from organizations focused on advancing Montrose's economic development. The DART board and City Planning Division meet regularly to guide community revitalization efforts and economic initiatives. Planning and exploration of revitalization strategies for the Site have been ongoing since 2014. As part of the EPA Cleanup Grant, the City will continue its established community engagement program to ensure broad participation and input.

The City is actively collaborating with the Colorado Department of Public Health and Environment (CDPHE) on cleanup activities. Additional key partners include the Colorado Department of Transportation (CDOT), Colorado Parks and Wildlife (CPW), the Colorado Water Conservation Board (CWCB), Great Outdoors

Colorado (GOCO), EPA’s LRTA program, KSU-TAB, and numerous local businesses and government entities. Together, these partners are working to secure additional state and federal funding to support ongoing projects. Community engagement has been robust, involving stakeholders such as the local School District, CDPHE, businesses near the Site, Montrose Recreation District, Colorado Outdoors, the Mexican American Development Association, and other community members.

**4.C.2.f Project Roles**

Name of organization/entity/group	Entity's Mission	Point of contact (name & email)	Specific involvement in the project or assistance provided
Montrose County School District	Providing educational opportunities for all in the community.	Carrie Stephenson, Superintendent; <a href="mailto:carrie.stephenson@mscd.org">carrie.stephenson@mscd.org</a>	Review reuse options and collaboration with Outer Range school.
Colorado Department of Public Health and Environment	The principal department of the Colorado state government, responsible for public health and environmental regulation.	Kathleen Knox, Brownfields Project Manager; <a href="mailto:Kathleen.knox@state.co.us">Kathleen.knox@state.co.us</a>	Cleanup, regulatory, and compliance oversight and potential financial assistance, as needed.
Montrose Recreation District	FUNdamentally improving lives by building community in fun and engaging ways.	Mari Steinbach, Executive Director; <a href="mailto:mari@montroserec.com">mari@montroserec.com</a>	Will assist in planning recreation uses in, on, and around the Site.
Mexican American Development Association (MADA)	Provides economic development resources, unity and empowerment through education, leadership development and access to resources.	Bethany Maher, Executive Director; <a href="mailto:director@mada.org">director@mada.org</a>	Provide entrepreneurship support, community connection, and assist with community engagement.
Colorado Outdoors	Transform Montrose into a compelling destination for business	David Dragoo, Executive Director; <a href="mailto:david@mayflyoutdoors.com">david@mayflyoutdoors.com</a>	Provide feedback on reuse options. Potential partner for redevelopment.

**4.C.2.g. Incorporating Community Input**

Upon receiving the grant, the City will: 1) host at least three public meetings at key project milestones (grant award, start of cleanup, and cleanup completion) announced on the City’s website, Facebook page, and local newspaper. 2) Provide updates and opportunities for public input through local meetings, including City Council, BAC, and DART meetings. 3) Distribute fact sheets, press releases, and updates on the City’s website and social media. 4) Partner with organizations representing diverse populations, including low-income communities, older adults, and people with disabilities, to expand access to job opportunities, workforce development, and economic growth initiatives. These outreach and engagement activities build on the City’s proven success engaging the community through the KSU-TAB program and the EPA’s LRTA program.

At least one meeting will be held near the Site to engage affected residents. Virtual participation options will be offered, such as live-streaming, recorded meetings, and an online comment form for those unable to attend in person. On-site signage will highlight EPA funding and provide a QR code linking to the City’s project webpage for further information. Translation and interpretation services will be provided to facilitate full engagement, which includes Spanish-speaking residents. Feedback collected from meetings and online platforms will be reviewed, summarized, and included in quarterly project reports, with responses or adjustments to the cleanup plans as needed.

**4.C.3 Task Descriptions, Cost Estimates, and Measuring Progress; 4.C.3.a Proposed Cleanup Plan**

The recommended remedial approach for implementation at this site includes Asbestos Spill Cleanup with Complete ACM/RBM (Regulated Building Materials) Abatement, PCB Remediation, a Materials Management Plan (MMP) for Impacted Soil, and Consolidation and Cover with a Beneficial Use Determination (BUD) for Fly Ash Areas. Per the ABCA, this alternative is the most practical remedial action approach to achieve the goal of preventing direct human contact with contaminated soil and will support the future use of the

property as a climbing gym and greenspace with public access to recreation activities on the Uncompahgre River. All ACM/RBM will be removed from the building and properly disposed of at a licensed landfill (approximately 16,000 square feet of spill cleanup, 5,000 linear feet of thermal insulation and glazing, and 5,000 square feet of miscellaneous materials). PCB-impacted concrete will be remediated in place and encapsulated (approximately 4,300 square feet). Fly ash will be reconsolidated, capped, and permitted through Colorado's Solid Waste Division (approximately 6,500 cubic yards).

Although environmental impacts identified during the investigations appear to be limited and isolated, the fly ash on site does exceed regulatory screening levels. It is therefore anticipated that cleanup levels consistent with unrestricted use may not be achieved throughout the Site. Where contaminants remain above unrestricted use criteria, institutional controls (ICs) and/or environmental covenants (ECs) will be implemented, as appropriate and acceptable to the City of Montrose, to ensure continued protection of human health and the environment consistent with CDPHE's Institutional Controls Implementation Guidance (CDPHE, 2020). A BUD will also be obtained for onsite fly ash. The site will be submitted under the Colorado Voluntary Cleanup Program (VCUP) for a no-action determination (NAD).

**4.C.3.b.-e. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, and Outputs**

<b>Task/Activity: Task 1 Program Management</b>
<b>b. Project Implementation:</b> 1) Includes quarterly reports, financial reporting and audits, quarterly updates to Assessment, Cleanup and Redevelopment Exchange System (ACRES), annual reporting, and reimbursement forms. 2) Retain a qualified environmental professional (QEP) and cleanup contractor to assist in managing grant activities procured through a qualifications-based bid process Request for Qualifications (RFQ). 3) Manage and maintain cleanup schedule and budget. 4) Travel & Training (US EPA National Brownfields Conferences).
<b>c. Anticipated Project Schedule:</b> QEP/Remedial Contractor Selection and Quarterly reporting beginning in late 2026, progress updates 2026-2028. Attend US EPA National Brownfields Conference in May 2027.
<b>d. Task/Activity Lead:</b> City lead with support from QEP.
<b>e. Outputs:</b> RFQ; documentation, high-quality QEP and cleanup contractor, EPA quarterly reports, annual federal reports, ACRES updates, summary report and forms submitted for payment, minutes from meetings, conferences, and training sessions, and managing the cleanup schedule and budget.
<b>Task/Activity: Task 2 Cleanup Planning</b>
<b>b. Project Implementation:</b> ACM/RBM abatement specifications, spill notifications, MMP, develop bid documents for subcontractors, review and approve subcontractor bids, PCB delineation, deed restriction and reporting, kickoff meeting with CDPHE, EPA, and QEP, prepare remediation plan and engineering documents, and prepare site-specific QAPP and HSP.
<b>c. Anticipated Project Schedule:</b> Winter 2026 – Spring 2027
<b>d. Task/Activity Lead:</b> QEP with oversight by City staff
<b>e. Outputs:</b> Plan of Action and schedule identified, approved spill notification, approved remedial action plan (RAP) and engineering/design documents and approved budget, identify and approve contractors, Quality Assurance Project Plans (QAPP), Health and Safety Plan (HASP), completing the EPA/CDPHE coordination and approval processes.
<b>Task/Activity: Task 3 Cleanup</b>
<b>b. Project Implementation:</b> 1) Clearance sampling and oversight of cleanup and abatement activities (ACM/RBM removal, PCB remediation, reconsolidation of fly ash, placement of backfill and covering), 2) Project Supplies 3) Completing Reports and NAD application as per State CDPHE and EPA.
<b>c. Anticipated Project Schedule:</b> Spring 2027 - project closeout Fall 2028.
<b>d. Task/Activity Lead:</b> QEP with oversight by City staff
<b>e. Outputs:</b> Total amount of asbestos disposed, square feet of PCB impacted concrete remediated, cubic yards of fly ash consolidated and covered, asbestos clearance sampling results, obtain a BUD, acres of site

restored, documentation for installation of erosion control measures, and closeout of the construction contract. Periodic inspections and bi-weekly site reports by QEP, sample analytical results. Remedial action documentation report, submitting a case close request and associated documents to the CDPHE, applying for permits, and paying regulatory fees, NAD issued by CDPHE.

**Task/Activity: Task 4 Community Involvement**

**b. Project Implementation:**

1) Work with project partners to ensure commitments are implemented (ongoing), 2) Prepare community relations plan (Q1 of project, late 2026). 3) Establish information repository (Q3 2026). 4) Hold three public meetings. 5) Prepare fact sheets and press releases to communicate the status and progress of the site cleanup. Project updates (both English and Spanish) will be posted on the City website and status updates will be provided to property owners in the neighborhoods adjoining the Site as well as at local meetings such as City Council, BAC, and DART (ongoing).

**c. Anticipated Project Schedule:** Will begin in late 2026 and have ongoing communication as project progresses to close out in 2028.

**d. Task/Activity Lead:** City lead

**e. Outputs:** Community Relations Plan, project fact sheet, website updates, public meeting minutes, newspaper postings, bi-lingual handouts and signage during public meetings.

**4.C.3.f. Cost Estimates**

Budget Categories	Project Tasks (\$)				
	Program Management	Cleanup Planning	Cleanup	Community Involvement	Total
Personnel	\$8,750	\$8,000	\$40,000	\$8,250	\$65,000
Travel	\$4,050	0	0	0	\$4,050
Supplies	0	0	\$9,700	\$650	\$10,350
Contractual	\$77,700	\$135,000	\$380,000	0	\$592,700
Construction	0	0	\$2,655,750	0	\$2,655,750
Other (include subawards and specific participant support costs such as stipends - specify type)	0	0	0	0	0
<b>Total Direct Costs</b>	<b>\$90,500</b>	<b>\$143,000</b>	<b>\$3,085,450</b>	<b>\$8,900</b>	<b>\$3,327,850</b>
Indirect Costs	0	0	0	0	0
<b>Total Budget</b>	<b>\$90,500</b>	<b>\$143,000</b>	<b>\$3,085,450</b>	<b>\$8,900</b>	<b>\$3,327,850</b>

Please note: QEP Labor Rates are \$150/hr, City Labor Rates are \$50/hr

**Task 1: Program Management**

**Personnel-** Oversight from the city (\$50/hr x 175hrs = \$8,750)

**Travel-** Travel to National Brownfields Training and Conference for two City staff members flight (2 x \$200= \$400); 4 nights lodging (2x \$200 x4= \$1,600); per diem 4 days (2 x\$50 x4=\$400), total= \$2,400

Brownfield related meetings/regional brownfield conference (\$150 mileage x 3 events= \$450, \$150/night hotel x 3 nights x 2 rooms= \$900 lodging; per diem x 2 staff (3 events x \$50 x 2 staff= \$300), total = \$1,650)

**Contractual-** Quarterly reports ( 50/hr x 315hrs= \$ 47,250); Annual Reporting (\$150/hr x 20hrs x 3= \$9,000); Financial reporting and audits ((\$150/hr x 10hrs x 5= \$7,500); Reimbursement forms (\$150/hr x 35hrs= \$5,250); Retain a qualified environmental professional and remediation contractor (\$150/hr x 30hrs= \$4,500); Manage and maintain cleanup schedule and budget and quarterly ACRES updates (150/hr x 28hrs= \$4,200)

**Costs Total- (Personnel= \$8,750 + Travel=\$4,050 + Contractual= \$77,700)= \$90,500**

**Task 2: Cleanup Planning**

**Personnel-** Oversight from the city and kickoff meeting (\$50/hr x 160hrs= \$8,000)

**Contractual-** Tasks to be completed by QEP at \$150/hr; \$45,000 (ACM/RBM Abatement Specifications), \$20,000 (Spill Notifications and Approval), \$15,000 (MMP), \$5,000 (Bid Documents, and Review Bids), and \$50,000 (PCB cost-delineate, deed restriction, reporting, QAPP and HASP development, kickoff meeting, and development of engineering plans and documents)

**Cost Total- (Personnel= \$8,000 + Contractual=\$135,000)= \$143,000**

**Task 3: Cleanup**

**Personnel-** Oversight from the city (\$50/hr x 800hrs= \$40,000)

**Supplies-** \$9,700 (electric generators and portable toilets (building does not currently have electric or water supplied to it)

**Contractual-** \$280,000 (80 work shifts at \$3,500/each shift asbestos-Oversight and Clearance Sampling & Project Coordination), plus \$35,000 (PCB cost-remediate and reporting), \$ 20,000 (completion report), and \$45,000 VCUP/NAD application

**Construction-** \$2,134,150 (ACM/RBM Abatement Contractor for removal and clearance sampling) plus \$420,000 (cost for consolidating and covering impacted soil and fly ash areas), plus \$101,600 (PCB cleanup).

**Cost Total- (Personnel= \$40,000 + Supplies= \$9,700 + Contractual= \$380,000 + Construction \$2,655,750)= \$3,085,450**

**Task 4: Community Involvement**

**Personnel-** Community relations Plan (\$50/hr x 30hrs= \$1,500), Three public meetings (2 city staff @ \$50/hr x 2hrs x 3 events= \$600), local newspaper postings (3 publications x \$ 250= \$750), Updates at ongoing local meetings such as the City Council, BAC, and DART meetings (attending at least one meeting per month (2 city staff @ \$50/hr x 2hrs x 20 events= \$4,000); Prepare fact sheets, press releases, (\$50/hr x 7hrs= \$350) and updates on the City’s websites (\$50/hr x 7hrs= \$350); work with project partners and establish information repository (\$50/hr x 14 hrs = \$700).

**Supplies-** Printing bi-lingual fact sheets/ handouts (300 prints x \$1.50= \$450); Bi-lingual signage (4 prints x \$50= \$200)

**Total= (Personnel= \$8,250 + Supplies= \$650)= \$8,900**

**4.C.3.g. Plan to Measure and Evaluate Environmental Progress and Results**

Anticipated project outputs will include a Work Plan, an EPA accepted QAPP and HASP, an accepted ABCA, and an approved CDPHE targeted remedial action work plan. The program manager will evaluate schedules, budget, and scope and track clearance samples, and photo documentation to provide final documentation to EPA/CDPHE.

Other outputs will include community coordination, public meeting handouts, presentations, and minutes, website development and pages, and implemented media strategy. Regularly submitted performance reports and ACRES reporting will be incidental to this project output list. Outcomes documented and measured will include acres of land and square footage of building(s) remediated and reclaimed, direct jobs created, tax revenue generated, pre-and post-redevelopment property values; outside investment leveraged, including other grant funds; and measured impacts on property values within 1,000 ft.

**4.C.4 Programmatic Capability and Past Performance; Programmatic Capability; 4.C.4.a. Organizational Structure**

The City of Montrose operates under a Council-Manager form of government, with a manager appointed by the City Council. The City Manager handles administrative functions, including budget management, project oversight, staffing, and operational decisions.

The City has assembled a highly experienced team to ensure the project is completed on time, safely, and cost-effectively. Collectively, the project leadership brings over 40 years of project management experience, having successfully overseen millions in grants and projects valued at over \$75 million. The team also regularly partners with top-tier design, engineering, environmental, and legal professionals. Additionally, the City will continue to leverage resources for brownfields projects, including training webinars, support from CDPHE, and the Kansas State University TAB program.

**4.C.4.b. Description of Key Staff**

Jace Hochwalt – Community Development Director, City of Montrose

Since 2022, Jace has secured over \$8 million in grant funding and led major planning initiatives, including the implementation of a new Land Use Code. With 10 years of municipal planning experience, he brings expertise

in applying planning tools to guide city growth. For this grant, Jace will oversee project planning, grant administration, and ensure all activities align with the City's development goals.

Michelle Wingfield – Community Initiatives Manager, City of Montrose

Michelle has led initiatives supporting economic development, community revitalization, and engagement of businesses and residents. She has strengthened public spaces, attracted businesses, and promoted equitable participation across the community. For this grant, Michelle will guide engagement efforts, ensuring inclusive participation and effective community connections.

Scott Murphy – City Engineer, City of Montrose

Scott has led numerous municipal revitalization projects, including ADA-compliant sidewalks, bike lanes, river corridor restoration, and grant-funded utility and wastewater upgrades. He brings extensive experience in design, construction management, and coordination of state and federal funding. For this grant, Scott will manage infrastructure planning and construction, ensuring streets, sidewalks, and utility improvements are executed to meet technical and regulatory standards.

Jim Scheid – Public Works Director, City of Montrose

Jim has overseen streetscape enhancements, parks, memorial site projects, and other major public works initiatives, bringing expertise in capital improvements, contract administration, and collaborative planning. For this grant, he will lead construction implementation, ensuring building and site improvements are completed efficiently and support the City's long-term infrastructure goals.

**4.C.4.c. Acquiring Additional Resources**

The City of Montrose recognizes that successful implementation of the proposed remediation will require additional technical expertise and resources and has the capacity to secure them. The City will coordinate with CDPHE and state, county, and local partners to leverage additional funding for redevelopment and post-cleanup activities, while anticipating completion of remediation using EPA Cleanup Grant funds. The City will procure a Qualified Environmental Professional (QEP) in compliance with federal procurement requirements (2 CFR 200.317–326) to manage grant-funded activities; selection will be based on experience with EPA Cleanup Grants, Quality Assurance Project Plans (QAPPs), and community outreach. The City will encourage use of local labor where feasible and will retain additional consultants, as needed and in accordance with federal guidelines, to ensure effective grant administration and project completion.

**Past Performance and Accomplishments; 4.C.4.d. Currently Has or Previously Received an EPA Brownfield Grant**

**4.C.4.d.1. Accomplishments**

The City of Montrose has extensive experience managing state grant and loan funds for revitalization and redevelopment and has successfully received and administered two USEPA Assessment Grants. The first grant (2014–2017) funded nine Phase I and three Phase II ESAs covering 33 acres, serving as a catalyst for the establishment of Mayfly Outdoors, a world-renowned fly-fishing manufacturer, in Montrose. Colorado Outdoors, the 150-acre mixed-use project featuring Mayfly Outdoors, is projected to employ over 1,300 people over 10–15 years, with an economic impact exceeding \$250 million. The second grant (2018–2022) supported 10 Phase I and four Phase II ESAs, including work on the Site, successfully identifying and characterizing brownfield properties, all documented in ACRES reports. The project team will leverage these proven methods and partnerships to secure additional funding, drawing on successes from the 2021 \$1.6M Uncompahgre River Restoration Project, the \$4.3M, 2.25-mile Great Outdoors Colorado Connect Trail, and the \$840K Montrose White Water Sports Park.

**4.C.4.d.2. Compliance with Grant Requirements**

The City of Montrose has a consistent history of meeting all EPA grant requirements, submitting quarterly reports and ACRES updates on time and in full compliance with submittal requirements. All annual financial statements have been properly filed, and no issues with submittals or tracking have been identified for any EPA cooperative agreement. All brownfield work was completed in accordance with approved workplans and specifications, and all funds were fully utilized during the respective periods of performance.

## **Threshold Criteria for Cleanup Grants**

### **2.B.1 Applicant Eligibility**

#### **2.B.1.a. Applicant Eligibility**

I affirm that my organization is the City of Montrose, Colorado, a municipal applicant and therefore, eligible to apply for this Cleanup grant.

#### **2.B.1.b. Applicant Eligibility 501(c) 4 Status**

The City of Montrose is not a 501(c)4.

### **2.B.2 Previously Awarded Cleanup Grants**

Neither the City of Montrose nor any other eligible entity has received an EPA Brownfield Cleanup Grant for the subject site applied for herein (30 W. South Fourth St., Montrose, CO).

### **2.B.3 Expenditure of Existing Multipurpose Grant Funds**

I affirm that my organization does not have an active EPA Brownfields Multipurpose Grant.

### **2.B.4 Site Ownership**

The City of Montrose owns the site, having purchased it on October 12, 2021. Prior to site acquisition the City commissioned two Phase I Environmental Site Assessments and one Phase II Environmental Site Assessment on the 5.54-acre property. The property was owned by the Public Services Company of Colorado and sold under Special Warranty Deed to JM Generation Associates, LLC in August 1998. Most recently, the City of Montrose purchased the property from JM Generation Associates in October 2021. A copy of the General Warranty Deed between JM Generation Associates and the City of Montrose is included in Attachments.

### **2.B.5 Basic Site Information**

Site Name: Bullock Electric Steam Plant

Address: 30 W South 4th Street, Montrose Colorado 81401

Owner: City of Montrose

Date of Ownership (or date you plan to acquire ownership): October 12, 2021

### **2.B.6 Status and History of Contamination at the Site**

a) The predominant site contaminant is hazardous materials in the presence of asbestos containing materials (ACM) specifically thermal system insulation (TSI, e.g., pipe insulation and fittings, chute insulation) which are present throughout the interior of the structure. An ACM delineation was conducted, and it was determined that, due to the presence of disturbed friable ACM over the trigger levels, a "Major Spill" Notification was required to be submitted to CDPHE. RBM findings resulted in a CDPHE "Major Spill" Notification for asbestos on March 20, 2024, for an asbestos "spill" that occurred prior to the City of Montrose acquisition of the Site, affecting both the building interior and surrounding exterior areas. A "Major Spill" Notification is a compliance action and not subject to enforcement, the City will work with CDPHE to address further during the time of cleanup.

The spill quantity was determined to be approximately 9,260 square feet (SF) in size inside the structure and 6,888 SF outside of the building in an adjacent area of building debris for a total spill area of 16,148 SF. The spill is required to be cleaned up prior to any "normal" abatement of intact ACM in the structure. The structure is currently boarded up and has restricted access due to a security fence surrounding the Site. Intact ACM remaining in the building includes various TSI pipe insulation, window glazing, furnace insulation,

transite paneling, and floor tile. These materials would need to be abated prior to renovation or demolition of the structure.

Universal wastes/ hazardous materials observed at the Property included fluorescent lamps and ballasts, various sized drums/containers of labeled and unlabeled materials and various gauges. Concrete chip samples indicated polychlorinated biphenyls (PCBs) exceeding US EPA high occupancy scenario.

Primary contaminants of concern identified in soil Resource Conservation and Recovery Act (RCRA) metals, volatile organic compounds (VOC), and polycyclic aromatic hydrocarbons (PAH). In particular, arsenic was detected above the EPA direct contact regional screening level (RSL) across the site. Soil concentrations of arsenic, although above the EPA RSL, are within historical background levels for the region.

Consultation with CDPHE and property redevelopment will reduce the exposure to arsenic. Future confirmatory sampling will include arsenic analysis. The PAH compound benzo(a)pyrene was also detected above the EPA direct contact RSL in soil sampled in the southwest portion of the site. Several RCRA metals, 1,2,4-trimethylbenzene (VOC), benzo(a)pyrene naphthalene, 1- methyl naphthalene, and 2- methyl naphthalene (PAH) were detected in soil above the EPA migration to groundwater RSL.

Petroleum impacts tend to be limited to surficial staining of soil due to spill, most likely resulting from a 10,000 Gallon underground storage tank removed in 1995 or leakage from equipment storage such as vehicles.

- b) The property contains a vacant steam electric power plant constructed in the 1950s that was taken out of service in 1983 and has remained inoperable since that time. Following nearly 40 years of vacancy, limited site activity, and periodic vandalism, the buildings have deteriorated and have been used intermittently for storage of former power plant equipment, vehicles, lawnmowers, boats, and construction materials.

Historically, coal was delivered to the site by rail, stockpiled on an adjoining property, and conveyed to the crusher and boilers via an overhead conveyor system; coal and later natural gas were used to fuel the plant. Off-site disposal of fly ash was first documented in 1977, with earlier bottom ash and fly ash reportedly conveyed by vacuum and water to an on-site pond. Electrical transformers located north of the plant and along the north side of the plant building were originally cooled with PCB-containing fluids and were reportedly retrofilled with non-PCB fluids in 1983, shortly before the plant was taken out of service.

#2 diesel fuel stored in a 10,000-gallon underground storage tank (UST) formerly on the east side of the power plant was likely used for power backup. Cooling water was supplied by the Uncompahgre River and discharged to the on-site pond via two pipes connected to a water strainer on the pond's north side. Permitting of this process, including monitoring of discharge parameters, was first granted in 1976. Natural ground cover consists mainly of weedy vegetation and trees. Soil piles containing debris, drums, equipment remnants, and junked vehicles are scattered across the site.

An approximate ½ acre pond is located in the west-central portion of the property. The approximate 4,300 square foot former power plant structures occupy the northeast portion of the property. Access to the subject property is via Water Avenue on the east side of the property.

- c) Environmental concerns at the Site include, include VOCs, PAHs, and metals in the soil (including surficial staining), as well as hazardous materials present in the ACM.

- d) The Site was contaminated through past operations by the prior owner, an electricity generation plant, which resulted in the releases of hazardous substances at the site. Asbestos was used in the construction of the building, PCBs were used within equipment in the building and fly ash was deposited outside the building on the ground. Asbestos has deteriorated resulting in damaged and intact asbestos inside the building and in an isolated area on the ground in building rubble. PCBs were in and on equipment used inside the building and has spilled onto the concrete floor at levels that exceed TSCA high occupancy levels. Fly ash was placed in an uncontrolled manner across the site and is regulated as a solid waste.

### **2.B.7 Brownfield Site Definition**

I affirm the site is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

### **2.B.8 Environmental Assessment Required for Cleanup Grant Applications**

I affirm that a written ASTM E1903-19 or equivalent Phase II environmental site assessment report has been completed for: Bullock Electric Steam Plant

Here follows a list assessments completed:

- Asbestos Survey for Demolition, Bullock Steam Plant – Lot B, 30 West South 4th, Montrose, Colorado 81401, prepared for Ayres Associates, Inc. by Christopher Lakin, P.E. and dated December 2015.
- Phase II Environmental Site Assessment Report, Bullock Electric Steam Plant – Lot B, 30 W. South 4th Street, Montrose, CO, prepared for the City of Montrose by Ayres Associates and dated May 2016.
  - PCBs were analyzed in soil, groundwater, and concrete chips as part of the 2016 phase II. PCBs were not detected over respective standards in any of the PCB samples collected.
- Building Structural Assessment and Building Hazard Assessment Reports, Former Bullock Electric Steam Plant, 30 West South 4th Street, Montrose, Colorado, prepared for CDPHE by Partners and dated May 2, 2024.
- Universal Waste/ Hazardous Materials and Regulated Building Materials Inventory, Former Bullock Electric Steam Plant, 30 West South 4th Street, Montrose, Colorado, prepared for CDPHE by Partners and dated May 3, 2024.
- Limited Phase II Subsurface Investigation, Former Bullock Electric Steam Plant, 30 West South 4th Street, Montrose, Colorado, prepared for CDPHE by Partners and dated May 9, 2024.
  - Concrete chips were analyzed for PCBs due to historic operations within the powerplant likely to have used PCBs and staining observed on the concrete floor during previous site visits. Additionally, groundwater, soil, and fly ash samples were collected under the limited Phase II to further characterize the Site.
    - PCBs were not detected above laboratory reporting limits in groundwater or soil samples.
    - PCBs in fly ash were below laboratory reporting limits for collected samples.
    - PCBs were detected above the high occupancy PCB range. PCBs were not further delineated at that time. Delineation will be completed in support of cleanup activities upon being awarded the cleanup grant.

### **2.B.9.b. Site Characterization**

i) The applicant is not a state or tribal environmental authority and is eligible and plans to enroll in the Voluntary Cleanup Program (VCUP) for fly ash. Asbestos, however, is cleaned up pursuant to Colorado asbestos abatement regulations overseen by the CDPHE Air Pollution Control Division. See enclosed letter from CDPHE, stating, “the site has been adequately characterized by qualified environmental

professionals and the asbestos characterization was completed by state- and AHERA certified Qualified Environmental Professionals” and that CDPHE is “is confident that the assessment is sufficient to prepare the required notification/permit application required of asbestos abatement projects”. See attached letter from Colorado Department of Public Health and Environment regarding site characterization. This letter was submitted directly to the EPA.

ii) PCBs in concrete have been identified through a limited Phase II completed in May 2024. Delineation work will be completed in conjunction with the cleanup efforts. The attached letter from CDPHE affirms that there is a sufficient level of site characterization completed to begin work on the Site.

### **III.B.10 Enforcement or Other Actions**

I affirm there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

### **2.B.11 Sites Requiring a Property-Specific Determination**

I affirm the Site does not require a Property-Specific Determination

### **2I.B.12 Threshold Criteria Related to CERCLA/Petroleum Liability**

#### **2.B.12.a Property Ownership Eligibility - Hazardous Substance Sites**

##### **2.B.12.a.iii.1. Bona Fide Prospective Purchase Liability Protection**

##### **2.B.12.a.iii.1.a Information on the Property Acquisition**

- i) The City of Montrose negotiated purchase from JM Generation Associates, LLC.
- ii) The City acquired property on October 12, 2021.
- iii) The City has Sole Ownership of the property.
- iv) Previous property owner from whom the City purchased the subject property: JM Generation Associates LLC.
- v) The City has no familial, contractual, corporate, or financial relationship with past owners.
- vi) The City of Montrose is not potentially liable or affiliated with any other person that is potentially liable for contamination at the site under CERCLA §107, because the City was not the owner or operator of the site at the time of operation or disposal of a hazardous substance at the site (1950s - 1983) and because the City undertook a thorough investigation of the site compliant with All Appropriate Inquiry legislation prior to taking ownership of the site.

##### **2.B.12.a.iii.1.b Pre-Purchase Inquiry**

On behalf of the City of Montrose, a pre-purchase inquiry at the Site was performed by a qualified environmental professional meeting the definition set forth in AAI regulations.

- i) Phase I Environmental Assessment Report (2015), ASTM Practice E1527-13, Former Bullock Power Plant Lot B, 326 Water Ave., Montrose, CO 81401, Parcel Number 3767-331-16-001 (July 2015), and a Phase II Environmental Site Assessment Report, Former Bullock Power Plant Lot B, 326 Water Ave., Montrose, CO 81401, Parcel Number 3767-331-16-001 (May 2016). An additional Phase I ESA Phase I Environmental Assessment Report, ASTM Practice E1527-13, Former Bullock Power Plant Lot B, 326 Water Ave., Montrose, CO 81401, Parcel Number 3767-331-16-001 (September 2021) was conducted prior to the City of Montrose’s purchase of the property.
- ii) Work was performed by Ayres Associates, an engineering consulting firm of approximately 300 staff, and the certifying staff was Jeffery Steiner, PG, Project Manager, and professional hydrogeologist, and Mitchell Banach, PG, professional geologist, both meet the definition of an environmental professional as set forth in AAI regulations.

- iii) The September 2021 Phase I ESA was completed less than 180 days prior to ownership by the City, which provided an update to the original May 2016 Phase I completed for the Site.

#### **2.B.12.a.iii.1.c Timing and/or Contribution Toward Hazardous Substances Disposal**

The City has not at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

#### **2.B.12.a.iii.1.d Post-Acquisition Uses**

The City of Montrose purchased the property in October 2021. The site and building are currently vacant. The City has repaired and mended the site access limiting exposure to the hazardous materials (ACM) including securing building openings from intrusion by nature or human. Overall future planning includes a climbing gym with greenway access to the Uncompahgre River. If approved, the Cleanup Grant will expedite the timeline for redevelopment.

#### **2.B.12.a.iii.1.e Continuing Obligations**

Steps the City of Montrose is taking to stop existing releases, prevent threatened future releases, and prevent exposure to previous releases includes the following:

- i) Restricting the Site to temporary use of the property only for remediation activities and removal of debris.
- ii) Site occupancy by the City reduces the potential for trespassing, vandalism, or other dumping. Restricting access to the Site and City ownership and monitoring of the Site prevents future releases.
- iii) Site occupancy by the City limits site access to only necessary personnel and therefore limits exposure to any previously releases hazardous substances.

Design and implementation of future building, structure, and pavement, and remediation activities, will follow applicable CDPHE cleanup standards and construction site erosion control best practices. We confirm our commitment to: (i) Comply with land-use restrictions and institutional controls; (ii) Assist and cooperate with those performing cleanup and provide access to the property; (iii) Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; (iv) Provide all legally required notices

### **2.B.13 Cleanup Authority and Oversight Structure**

#### **2.B.13.a Cleanup Oversight**

During all stages of design and cleanup, the City and its partners will work together with the CDPHE and the EPA to develop a strategy that meets all state and federal health and safety standards. Shortly after the cleanup grant is awarded, the City will follow procedures detailed in 2 CFR 200.317-326 for the procurement process to select an environmental consultant project team and will release a competitive, public Request for Qualifications in order to select the team deemed most qualified by a review committee. The environmental consultant will be used to prepare a final cleanup plan, prepare plans and specifications for project bidding, and to provide construction oversight during the cleanup process.

The Site will be entered into the Colorado Department of Public Health and Environment's (CDPHE's) Voluntary Cleanup Program (VCUP) and an application for a No Action Determination (NAD) will be sought. Asbestos will be addressed through the CDPHE's Air Pollution Control Division (aka Regulation 8) and PCBs will be addressed following US EPA's Toxic Substance and Control Act (TSCA) regulations.

### **2.B.13.b Access to Adjacent Properties**

The site is directly accessible by public roadways. Based on results of the Phase II ESA, access to neighboring properties will not be necessary for cleanup activities. However, the City of Montrose will maintain communication with adjacent property owners should access become necessary in the future. To access and implement remedial actions, no access is anticipated from neighboring properties.

### **2.B.14 Community Notification**

#### **2.B.14.a Draft Analysis of Brownfields Cleanup Alternatives**

I affirm that a draft ABCA has been completed for this cleanup grant application and has been provided to the public for comment. A Draft copy of the ABCA and application was posted to the City Website on January 12, 2026. Public comments were not received following the notification.

#### **2.B.14.b Community Notification Ad**

Bullock Electric Steam Plant: A public meeting was held on January 20, 2026 at 6 PM and a community notification ad was published on January 10, 2026 in the Montrose Daily Press prior to the submission of this cleanup grant application. A copy of the draft Cleanup Grant Application and the Draft ABCA were made available for review at Montrose City Hall, the [www.cityofmontrose.org](http://www.cityofmontrose.org), and via email. A copy of the notice is attached.

#### **2.B.14.c Public Meeting**

A community meeting was held on January 20, 2026 at 6 PM. There were no additional comments from the public regarding the Application.

#### **2.B.14.d Submission of Community Notification Documents**

A copy of the ABCA and proof of all community notifications are provided as attachments to this application. Comments are not provided in the attachments as none were received.

### **2.B.15 Contractors and Named Subrecipients**

The City does not currently have a contractor hired for this work, following award of the grant, the City of Montrose intends to conduct a competitive RFQ for selection of a QEP and remediation contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500. The City does not plan on awarding funding to any subrecipients.

January 23, 2026

Melisa Devincenzi  
Environmental Protection Agency  
Region 8 Brownfields Program  
1595 Wynkoop Street (EPR-B)  
Denver, Colorado 80202-1129

Via email - [Devincenzi.Melisa@epa.gov](mailto:Devincenzi.Melisa@epa.gov)

RE: Former Bullock Electric Steam Plant - FY26 Cleanup Grant Application

Dear Ms. Devincenzi:

The Colorado Department of Public Health and Environment (CDPHE) has been working in close partnership with the City of Montrose for the past four years supporting their efforts to address brownfields properties in their community. As part of our ongoing and successful partnership, I am writing to acknowledge and express our support of the City of Montrose's FY 2026 Brownfields Cleanup Grant application for the former Bullock Electric Steam Plant located at 30 W South 4<sup>th</sup> Street, Montrose, Colorado. Cleanup and adaptive reuse of the property will not only address a long-standing environmental threat, but expand public greenspace access, create jobs, and serve as a catalyst property for the West Main Corridor of Montrose.

CDPHE has reviewed the site characterization data associated with this application and determined that the site has been adequately characterized by qualified environmental professionals and the asbestos characterization was completed by a state- and AHERA-certified Qualified Environmental Professional, who followed state and federal regulations in the sampling scope and methodology. While this project is eligible to enroll in the Voluntary Cleanup (VCUP) Program, asbestos abatement projects are cleaned up pursuant to Colorado asbestos abatement regulations overseen by the department's Air Pollution Control Division. Based on the expertise and certifications required for the assessment, CDPHE is confident that the assessment is sufficient to prepare the required notification/permit application required of asbestos abatement projects. A final determination of the adequacy of site characterization for the asbestos abatement portion of the cleanup will be made by the department's Air Pollution Control Division following receipt of the permit application for the project. Should additional site characterization be required, the department's brownfields program can assist the applicant in collecting the necessary data prior to the June 15, 2026 deadline specified in the grant solicitation guidelines.

Pending a successful proposal by the City of Montrose, CDPHE has additional resources to assist completion of the activities outlined in the proposal. These resources range from technical and planning resources to financial resources to assist with the cleanup. CPDHE has informed the City of Montrose of the availability of these resources and can assist with the application process if requested.

In closing, I again want to express the department's support for the City of Montrose's Brownfields Cleanup Grant application for Former Bullock Electric Steam Plant. CDPHE hopes that successful cleanup and redevelopment of the site can create a community focal point that serves as a catalyst for continued revitalization in Montrose.

Sincerely,



Brownfields Coordinator  
Hazardous Materials and Waste Management Division

cc: Jace Hochwalt, City of Montrose  
William Bell, City of Montrose  
Dave Frank, City of Montrose

