

Burlington Gymnasium, Burlington School District, Burlington, Colorado  
 FY2025 US EPA Brownfields Cleanup Grant Application

**US EPA Brownfields Cleanup Grant – Application Information Sheet**

*R08-26-C-005*

**B.1. | Applicant Identification**

Burlington School District RE-6J  
 2600 Rose Ave., Burlington, CO 80807

**B.2. | Website URL**

<https://www.burlingtonk12.org/>

**B.3.a. | Grant Type**

Single Site Cleanup

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

Federal Funds Requested: \$1,014,405.24

**B.4. | Location**

Burlington, Kit Carson County, Colorado

**B.5. | Property Information**

Burlington Gymnasium, 450 11th St., Burlington., CO 80807. Exhibit A

**B.6.a. | Project Director**

Name: Shane Walkinshaw

Ph: 719-346-8737

E: [swalkinshaw@burlingtonk12.org](mailto:swalkinshaw@burlingtonk12.org)

Mailing Address: 2600 Rose Ave., Burlington, CO 80807

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

Name: Darren Bennett

Ph: 719-346-8737

E: [darren.bennett@burlingtonk12.org](mailto:darren.bennett@burlingtonk12.org)

Mailing Address: 2600 Rose Ave., Burlington, CO 80807

**B.7. | Population**

The Gymnasium is located in Burlington, CO, which has a population of 3,172 according to the 2020 U.S. Census.

**B.8. | Other Factors**

<b>Sample Format for Providing Information on the Other Factors</b>	<b>Page #</b>
Community population is 15,000 or less.	1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A

**B.9. | Releasing Copies of Applications**

N/A

## **US EPA Brownfields Cleanup Grant – Application Narrative**

### **C.1.a | Overview of Brownfield Challenges and Description of Target Area**

The Burlington School District (BSD) seeks an EPA Brownfields Cleanup Grant of \$1,014,405.24 to remediate the Burlington Gymnasium, a historic WPA-era structure located on the Burlington Elementary School (BES) campus in Burlington, Colorado. Burlington is the county seat of Kit Carson County, with a population of 3,172 according to the census. As a small, rural frontier community with an agriculture-based economy, Burlington faces long-term disinvestment in aging public infrastructure and limited access to redevelopment capital.

The target area is the City of Burlington, located 12 miles West of the Kansas border, off I-70, with a total area of approximately 2.15 square miles. Burlington is a small rural community where vacant, underutilized, and environmentally impaired properties are dispersed throughout the city rather than concentrated in one neighborhood. As the local economy and housing market function as a single integrated system, brownfield conditions anywhere in the city affect public safety, neighborhood stability, and municipal costs. For these reasons, the City of Burlington has designated its entire municipal boundary as the Brownfields target area. According to the 2019–2023 American Community Survey (ACS) 5-year estimates, Burlington has a median household income of \$59,842, substantially below the Colorado median (~\$92,470), and median home values (~\$199,000) reflect limited market capacity to absorb redevelopment costs. These conditions constrain private reinvestment and increase reliance on public assistance for environmental cleanup. Burlington contains numerous older residential, commercial, and public buildings constructed prior to modern environmental standards. Many are vacant or deteriorated due to deferred maintenance, ownership complications, or limited redevelopment demand. Known environmental concerns include asbestos-containing materials, lead-based paint, mold, and other hazardous building components. Abandoned structures also pose fire, safety, and trespass risks, increasing liability and neighborhood blight. Cleanup costs exceed local financial capacity without federal assistance.

As Burlington operates as a single community system, the cleanup of brownfield sites across the city yields community-wide benefits. Grant-funded activities will include hazardous material abatement and proper disposal, preparing the site for reuse. Designating the entire City of Burlington as the target area ensures coordinated cleanup, reduces environmental health threats, improves public safety, increases potential for recreational activities and educational offerings, and supports long-term community revitalization.

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

The Burlington Gymnasium at 450 11th Street in Burlington, Colorado, is the sole property targeted for cleanup. The two-story WPA-era structure with a full basement, approximately 20,000 sq. ft., is located on the Burlington Elementary School campus, immediately adjacent to playgrounds and school entrances, within walking distance of downtown, directly across from HUD housing for elderly and disabled residents, and surrounded by residential neighborhoods. Its location within an active school setting increases potential exposure and heightens the severity of environmental concerns at the site, which directly affect students, families, and nearby residents.

Constructed between 1938 and 1941 and listed on the National Register of Historic Places, the building historically served as a gymnasium and community gathering space before being vacated in 1999 due to environmental hazards. Limited stabilization work completed in 2008 prevented major structural failure; however, contamination has continued to prevent reuse, and the building has deteriorated.

EPA Region 8 Targeted Brownfields Assessments confirm extensive asbestos-containing materials, lead-based paint, and areas of suspected mold throughout the structure. Asbestos is present in flooring, window glazing and caulking, pipe insulation, joint compound, and roofing materials, including friable materials capable of releasing airborne fibers. Asbestos fibers were also detected in interior dust samples, confirming exposure pathways. Lead-based paint is present on interior surfaces at concentrations exceeding HUD hazard thresholds. Water damage and suspected mold were observed in the basement and roof areas. Contamination is attributable to the building's age, historic construction materials, and decades of use followed by vacancy and deferred maintenance. Limited local funding capacity and the high cost of environmental remediation have prevented cleanup, leaving the building unused and contributing to blight. The site is a high-priority cleanup site due to its location on an active elementary school campus and its proximity to sensitive populations, including children, elderly, and disabled residents. Although currently secured, deteriorating exterior conditions and adjacency to student activity areas create an ongoing risk of incidental exposure.

These conditions pose ongoing public health and safety concerns, limit school programming and recreational opportunities, and reduce access to indoor community space. In a rural community with few alternative facilities, the loss of the gymnasium has disproportionately affected students, families, and older residents. This cleanup grant will fund remediation of asbestos and lead hazards, eliminating exposure risks. Cleanup will allow the building to be safely rehabilitated and returned to productive community use, restoring a critical space for education, recreation, and community gatherings while protecting public health and strengthening long-term community vitality. Without remediation, the building will continue to pose risks, and the community faces permanent loss of a historically significant landmark.

### **C.1.c | Reuse Strategy and Alignment with Revitalization Plans**

The reuse and revitalization of the Burlington Gymnasium have been long-standing community goals. When redevelopment was first envisioned in 2007, the community identified the gym as an ideal center for sports and after-school activities. Building on that vision and current school and community needs, the reuse plan focuses on creating a safe, welcoming space for children, youth, and families while restoring a historic community landmark and strengthening the partnership between the school and the broader community.

As a National Register-listed historic structure, preserving the gym's physical character and cultural significance is a priority. The main floor, including the basketball court, stage, and bleachers, will be restored for youth sports, school events, performances, and community gatherings. While the court is no longer regulation size for high school competition, it will support youth basketball, volleyball, cheerleading, soccer, and community recreation. The gym will be open after school and on weekends, addressing current shortages of indoor activity space and reducing scheduling challenges. The restored stage will allow plays, art exhibitions, concerts, and traditional school and community events to return.

Basement redevelopment will provide flexible space for educational and community-serving uses. Possible plans include relocating 5th-grade classrooms to the elementary campus to create a more age-appropriate learning environment; developing a Career and Technical Education programs such as a culinary classroom, to provide workforce training and partnerships with local restaurants; a STEM lab or maker space; and creating multipurpose rooms for service providers, behavioral health support, meetings, and after-school programming. These rooms will also be available for community use outside school hours.

The reuse plan includes space for a community pantry and the school's Cougar Closet program to address food insecurity and basic needs. With over 60% of students qualifying for free or reduced lunch and a four-day school week, expanded food access is a critical community need. Additional community space will support meetings, activities, and events, and building modifications will ensure ADA accessibility.

Reuse concepts were developed through extensive community input, including the Community Engagement Report for the Burlington School District, conducted in Fall 2024 for the strategic planning process; City of Burlington Comprehensive Plan 2025, developed in Spring 2025, which specifically noted priority actions of conversion or expansion of existing space, identifying and using vacant space for youth programming, continued collaboration with the district, and adding additional recreational programming; and other community forums, such as the District Accountability Committee (DAC) Superintendent Advisory Council (SAC) the public meeting for the grant, and meetings with invested community groups such as Rotary and the Prairie Cultural Revitalization. Bringing this cherished place back to life rather than allowing it to deteriorate further has generated excitement within the community. Once the abatement begins, we will ask the community to provide pictures and written documentation of memories to help guide the reuse process.

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

Following cleanup and reuse, approximately 20,000 square feet of vacant space will be converted into a multipurpose educational, recreational, and community-serving facility. The project will increase usable indoor recreation space by approximately 25% and expand school and community basketball practice capacity by roughly 50%, reducing scheduling conflicts and increasing access to structured, safe recreation in a rural community with limited facilities.

Beyond athletics, the gymnasium will operate as a community recreation and youth activity hub during after-school, evening, and weekend hours, providing a safe, climate-controlled gathering space year-round. Community rooms will support public meetings, nonprofit programming, and expanded activities in partnership with the local recreation department, consistent with priorities in the Burlington Comprehensive Plan. Expanded pantry space will improve food storage and distribution capacity for residents experiencing food insecurity.

Educational benefits include space for returning 5th-grade classrooms to the elementary school serving approximately 60 students annually and a Career and Technical Education (CTE) culinary classroom providing workforce training for up to 60 high school students. This program would be the first of its kind in Kit Carson County and would support the continued expansion of CTE offerings.

The project will enhance community resilience by providing additional emergency shelter capacity during severe winter storms, power outages, and tornado events, offering a safer location than the current school hallways.

Rehabilitation will incorporate ADA accessibility and energy-efficient building systems, including high-efficiency HVAC and boilers, building automation controls, water-efficient fixtures, LED lighting, and modern lighting controls. These upgrades will reduce operating costs, improve indoor air quality, and enhance long-term sustainability.

All rehabilitation work will be coordinated with state and national historic preservation agencies to ensure the Burlington Gymnasium's historic character is preserved and honored.

#### **C.1.e | Resources Needed for Site Characterization**

The Burlington School District received a Region 8 Targeted Brownfields Assessment (TBA) support in March 2024, which funded completion of an Asbestos and Lead-Based Paint Inspection Report, Cleanup Planning and Cost Estimate, and an Analysis of Brownfields Cleanup Alternatives (ABCA) for the Burlington Gymnasium site, creating the Phase II environmental assessment. Based on these completed assessments, there is currently sufficient site characterization to support remediation planning, and no additional environmental assessment activities are anticipated at this time.

If unforeseen conditions arise during remediation that necessitate supplemental site characterization, the Burlington School District will seek additional assistance through the Colorado Department of Public Health and Environment (CDPHE) and the State Brownfields Program, or other technical assistance resources.

#### **C.1.f | Resources Needed for Site Remediation**

The EPA Brownfields grant will fully fund the remediation of the asbestos and lead. While the original cleanup cost estimate was prepared in November 2024, recent market information indicates asbestos and lead abatement costs have increased by approximately 10–15% over the past year. To ensure conservative budgeting, the project team applied a 15% escalation factor to the prior estimate of \$846,000, resulting in an updated working estimate of approximately \$972,900. This amount remains within the funding requested under this grant, and the district therefore anticipates that cleanup and remediation activities can proceed without requiring additional assessment funding.

In the event of a cost overrun, we could seek cleanup grant funding through CDPHE's 1306 Brownfields Cleanup Grant Program, which provides \$250,000 annually for cleanup grants, and the Rural Housing and Development Asbestos and Lead Paint Abatement Pilot Grant Program. CDPHE also has a brownfields revolving loan fund that could be accessed. The Colorado Brownfields Remediation Tax Credit could also be explored. Funding secured by the district would also help with any additional needs.

The district will continue to coordinate closely with CDPHE to ensure that the level of site characterization remains adequate through project implementation and that any emerging data needs are promptly addressed. The cost of mold abatement is not included in the grant, as once all asbestos and lead abatement is completed, the extent of the mold will be revealed and can be tested and addressed in conjunction with the reuse construction.

#### **C.1.g | Resources Needed for Site Reuse**

**The following resources have been identified:**

- Burlington School District, Secured, \$50,000 – Exhibit D – Letter of Financial Commitment
- Windfarms and pipeline companies, Unsecured, Companies building and operating windfarms and pipelines in the county are looking for investment opportunities in the community. Based upon conversations and historical funding, potential funding could be anywhere from \$2,500 to \$30,000.
- Gates Capital, Unsecured, The reuse plan for the gymnasium meets the priorities of community involvement, rural area, support from the governing board, and a strategic priority. The approximate funding request would be about \$30,000.
- City of Burlington, Unsecured, In 2007, when the project was not completed, pledged \$5,000.
- Save America's Treasures Grant, Unsecured, Grant opportunity for preservation projects.
- Rotary, Unsecured, While currently there is no official monetary commitment, the Rotary is in full support of this project and willing to help in any way it can.

- Cooper Clark Foundation, Unsecured, Supports programs in Eastern Colorado and Western Kansas. Approximate funding request would be about \$25,000.
- Colorado State Historical Fund, Unsecured, Provided support back in 2009-2012 for the foundation and parts of the roof to prevent further deterioration. Approximate funding request ~\$250,000.
- Black Hills Corporation Foundation, Unsecured, The reuse strategy aligns with their 3 key giving priorities. Approximate funding request ~\$10,000.
- BMO Bank, Unsecured, The reuse strategy aligns with the giving priorities of BMO grows economies, and BMO grows strong communities. Approximate funding request ~\$10,000.
- Preservation Tax Credit, Unsecured, BSD will work with Prairie Cultural Revitalization regarding tax credits, as they have already completed the process and want to assist with their knowledge.

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

The Burlington Gymnasium is not fully served by existing sewer, water, telecommunications, natural gas, and electrical services. The building had electricity until about 2019, when the new HVAC system was put in the elementary school. However, the building is located on the elementary campus, among dense housing, caddy-corner to elderly and disabled public housing. The building itself will be reused, and as many of the historical and community-loved items as possible will be kept and restored. Beams in the building will be encapsulated during the process and will remain as part of the infrastructure. A significant emphasis will be placed on keeping valued historical items and architecture from the original WPA project. Coordination and expertise from the historical society will be utilized. There will be necessary upgrades, including energy-efficiency upgrades, as well as new mechanical, electrical, plumbing, and ADA access. Energy efficiency measures will be sought as outlined in C.1.d.

**C.2 Community Need and Community Engagement**

**C.2.a. | The Community's Need for Funding**

Due to Burlington's small rural population of 3,172, the tax base is limited. Until recently, Burlington RE-6J had the lowest mill levy in the area and approved a 9.5 mill override in 2023 to support staffing and programs. Most of the money went to teacher salaries to make it competitive with other districts in the county. The City of Burlington is raising its water and sewer rates due to infrastructure failures and the construction of a new wastewater treatment facility. Other economic data from the ACS 20235 – 5 years indicates increased economic funding need include:

2023 Median Household Income	\$59,842	2.74% 1-year decline
2023 Median Property Value	\$199,000	22.5% 1-year growth
2023 Employed Population	1615	7.08 1-year decline

**C.2.b | Health or Welfare of Sensitive Populations**

The Burlington Gym is located on the site of Burlington Elementary School, placing it in close proximity to sensitive populations, including school-aged children, youth, and elderly or disabled residents. According to 2024–2025 enrollment data, approximately 320 children attend Burlington Elementary, and a local Catholic school .2 miles down the street, enrolls about 90 children. Caddy corner to the site is the Burlington Housing Authority, which provides 16 units for elderly and disabled residents. The surrounding area is a residential neighborhood, further emphasizing the high exposure potential for sensitive populations. With school-aged children playing on the playground and around the school stairs after hours, and seniors living just a short distance away, these populations have significant potential exposure to site hazards. Testing has identified asbestos on the gym stairs and broken windows. While the windows are mostly boarded up, they continue to pose risks of contamination. Economic vulnerability further heightens risk. Many households in Burlington fall below or near quality-of-life threshold incomes:

Household Size	Quality-of-Life Threshold Income (Annual)	Burlington Median Household Income
2 adults, 1 child	\$65,000	\$59,842
2 adults, 2 children	\$75,000	\$59,842
2 adults, 3 children	\$85,000	\$59,842

According to the local food bank, the monthly mobile pantry continues to rank among the top in Colorado for boxes distributed, and the number of emergency food boxes has significantly increased, averaging 93 per month in 2025, up from 56 in 2023. By securing funding for cleanup and developing the Burlington Gymnasium for reuse, the City of Burlington will be able to provide safe educational, recreational, and

community spaces, thereby improving social support, health, job skills, and resilience, particularly for families at or below the income threshold. CTE opportunities will enhance job skills and workplace readiness, while increased recreational activities will improve mental and physical health. Because Burlington is a small rural community, some local statistics are suppressed; therefore, Kit Carson County-level data were used to contextualize health risks. According to CDPHE, Burlington is a High-Risk, Low-Testing area for lead. Kit Carson County, where Burlington is located, has a 9/10 “Lead Risk Rank,” and 80% of Colorado counties have lower risk than Kit Carson County and 100% lower than the average childhood lead testing rates. Easy access to contaminated areas at the gym increases these risks, particularly for youth and children.

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

Burlington faces many health concerns that warrant the cleanup and reuse of the space.

CDC PLACES data noted the following concerns at higher rates:

Measure	US Age- Adjusted Prevalence %	Burlington, CO Age- Adjusted Prevalence %
Arthritis among adults – 2023	21.9	23.4
Current asthma among adults – 2023	9.8	11.7
Cancer (non-skin) or melanoma among adults - 2023	6.6	7.1
COPD among adults – 2023	5.3	6.5
Coronary heart disease among adults - 2023	5.3	5.6
Depression among adults – 2023	20.7	24.5
Binge Drinking among adults – 2023	16.6	18.2
Current cigarette smoking among adults - 2023	11.6	14.4
Frequent mental distress among adults - 2023	16.3	19
Frequent physical distress among adults - 2023	12.1	14.3
Fair or poor self-rated health status among adults - 2023	18.3	19.6
Any disability among adults – 2023	28.3	31.7

CDPHE also notes COPD hospitalizations: age-adjusted rate at statistically higher than the statewide average, with Kit Carson County at 19.25 vs Colorado 5.15; asthma emergency department visits: age-adjusted rates for Kit Carson County at 60.69 vs Colorado at 29.88. This grant will allow for the cleanup of hazardous materials of lead and asbestos, which contribute to cancer and birth defects, thereby decreasing the risk to sensitive populations. Through the reuse plan, both physical and emotional health, including asthma, can be positively impacted due to the increased recreational space, allowing for more physical activity, especially when outside conditions, such as the frequent dust storms that occur in Eastern Colorado, negatively impact air quality. With a reuse plan that includes more recreational opportunities, community members can interact more with others, creating strong bonds and positively impacting health.

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

The Burlington Gymnasium is located on the BES campus in a small rural community with limited economic resources and long-term disinvestment in public infrastructure. Over the past five years, approximately 62% of district students have qualified for free or reduced-price lunch, reflecting widespread economic hardship among households. The site is immediately adjacent to school playgrounds and student entry areas and across from HUD housing for elderly and disabled residents, placing economically vulnerable and sensitive populations in close proximity to a deteriorating, contaminated structure. Due to limited local funding, the gymnasium has remained vacant despite the presence of known asbestos-containing materials and lead-based paint. As a result, students, families, and nearby residents have disproportionately borne the environmental and safety risks associated with deferred maintenance, structural deterioration, and potential exposure to hazardous building materials. In a rural community with few alternative facilities, the loss of the gymnasium has also reduced access to safe indoor recreation, educational programming, and community gathering space.

This grant and reuse strategy directly address these inequities. Cleanup will permanently remove asbestos and lead hazards, eliminating exposure risks for children, school staff, and nearby residents. Reuse of the facility will restore essential indoor recreational, educational, and community-serving space in a community

with limited alternatives. Planned food pantry and basic-needs services within the building will expand access to food and support for low-income families, while new student service and workforce training spaces will improve access to educational and economic opportunities.

By removing environmental hazards and reinvesting in a long-vacant public facility, this project reduces disproportionate environmental burdens on economically disadvantaged populations and strengthens long-term community health, safety, and opportunity in Burlington.

#### **C.2.e | Project Involvement**

#### **C.2.f. | Project Roles**

**The following people/organizations have been identified:**

- Skarco, Dustin Skarco – info@skarcodesign.com - 719-342-5068, Previous school board member and local construction company. Provide general knowledge regarding construction for the reuse plan and contacts in the industry with companies that will travel to rural locations.
- City of Burlington, Jim Keehne, City Administrator, 719-346-8652, Coordinate the reuse plan to meet the recommendations of the City of Burlington 2025 Comprehensive Plan. Working with the permitting, applicable disposal, and utilities. Partnership on grants and funding sources.
- Rotary, Londee Haines, 719-340-0153, Many rotary members are excited about the possibilities, and the project has the full support of the Burlington Rotary throughout the cleanup and reuse process.
- Prairie Cultural Revitalization, Melissa Kleweno - pcrburlington@gmail.com - 719-342-1531, Focused on revitalizing the community of Burlington. Significant interest in assisting with this project through the cleanup and reuse process. This organization has a strong background and knowledge related to historical sites, tax credits, and available funding for historical properties.
- District Accountability Committee, Jessica Schart – 719-482-5278, Working with the district on community engagement for the project, as well as providing input and support for the reuse plan. DAC has been involved in this grant development.
- Kit Carson County Public Health and Environment, Valorie Boyd – Valerie.Boyd@kitcarsoncounty.org - 719-346-7158 ext. 432, Subject matter expert
- Kit Carson County Collaborative Management Program, Jessica Schart, ██████████ Assistance with grant writing, data collection, reuse plan, and community engagement. Currently, heavily involved in this grant development.
- Kit Carson County Memorial Hospital Foundation, Kindra Mulch – foundation@kcchsd.org – 719-346-5311 ext. 3603, The foundation focuses on education, capital, and the Social Determinants of Health, and would be involved in the reuse planning as well as fundraising support for reuse.

#### **C.2.g. | Incorporating Community Input**

Community engagement is a cornerstone of this project, as no project of this size can succeed without it. Supporting children, youth, and their families, and creating a community that feels like home are the goals of the Burlington Gym’s reuse strategy. For success, the community has to be involved. To gather input, refine needs, and update the community, BSD will use a variety of strategies. It will be a standing agenda item for the Burlington School Board and the DAC. The community will be reached through sporting events, social media posts, newspaper articles and updates, local radio, and community events. The district also sends numerous surveys throughout the year to solicit input from families at the school. Events at the local senior citizen center and flyers at the Burlington Housing Authority complex will also be utilized. To ensure community input is continually received and updates are provided, presentations to groups such as the SAC, Rotary, and Prairie Cultural Revitalization will be held. We know community support is vital because if key people leave, we have to ensure someone is right behind them to help guide and champion. To ensure community input is meaningfully considered and responded to, BSD will work with a consulting firm to incorporate ideas and themes that are generally in consensus into the design of the reuse plan. Several iterations and/or options of the reuse plan, based on community input, will be provided to the community and continually adapted based on that feedback until the final product is produced.

### **C.3 Task Descriptions, Cost Estimates, and Measuring Progress**

#### **C.3.a | Proposed Cleanup Plan**

##### **Cleanup Plan Summary – Burlington Gymnasium**

##### Cleanup Plan Summary – Burlington Gymnasium

The proposed cleanup plan for the Burlington Gymnasium is based on the Analysis of Brownfields Cleanup Alternatives (ABCA) prepared by Tetra Tech under EPA’s START V Targeted Brownfields Assessment

program (October 30, 2024). The ABCA identified asbestos-containing materials (ACM), lead-based paint (LBP), and mold-impacted materials throughout the building that must be addressed prior to renovation and reuse.

#### Contaminated Media to Be Addressed

The cleanup plan focuses on building materials, not soil or groundwater. Contaminated media include:

- ACM: friable and non-friable materials in window caulking and glazing, joint compound at exterior stairs, vinyl floor tile and mastic, pipe insulation, and roofing materials.
- LBP: approximately 24,336 square feet of painted surfaces on doors, door frames, beams, walls, baseboards, fixtures, and basketball equipment.

No soil, groundwater, surface water, or sediment contamination was identified; therefore, cleanup activities are limited to interior and exterior building materials.

#### Proposed Cleanup Methods

##### Asbestos Cleanup

The selected cleanup method is full abatement of all friable and non-friable ACM prior to renovation.

- All ACM will be removed by a licensed Colorado asbestos abatement contractor.
- Work will comply with NESHAP (40 CFR Part 61), AHERA, OSHA worker protection standards, and CDPHE regulations.
- Engineering controls will include containment, negative air pressure, and dust suppression.
- Post-abatement air clearance testing and visual inspections will be conducted prior to re-occupancy.

This approach eliminates exposure pathways and allows unrestricted redevelopment of the site.

##### Lead-Based Paint Cleanup

The selected method is the abatement of all lead-based paint that will be impacted by renovation.

- LBP will be removed by a licensed lead abatement contractor in compliance with HUD guidelines, Colorado Regulation 19, and OSHA Lead in Construction standards (29 CFR 1926.62).
- Removal focuses on painted surfaces that pose exposure risks, especially in areas intended for child occupancy.
- Clearance sampling and final reporting will confirm successful abatement.

This method permanently removes lead hazards rather than relying on long-term controls.

##### Disposal Requirements

- Asbestos and lead-containing materials will be containerized, transported, and disposed of at licensed, approved disposal facilities in accordance with federal, state, and local regulations.
- Waste characterization will be completed as required prior to disposal.
- Transportation and disposal will follow CDPHE and EPA requirements.
- Clearance documentation will be maintained as part of the Final Abatement Report.

The estimated total cleanup cost in October of 2024 was \$846,000, excluding mold abatement costs and disposal fees, which is reasonable given the extent of contamination and the need for safe reuse.

#### **C.3.b - e. | Project Implementation**

Task/Activity 1: Grant Administration
i. Project Implementation: The BSD Superintendent will oversee and supervise the Burlington Gymnasium Brownfields Cleanup grant. Activities include managing the Cooperative Agreement, procuring the consultant and contractor(s), conducting regular meetings with the consultant and EPA, output tracking for all tasks, tracking the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database entries, preparing the annual financial report and quarterly program reports to the EPA, and a final comprehensive report. The Business Manager will assist in the financial aspects of the grant.
ii. Anticipated Project Schedule: This activity will be initiated at project inception. Consultant selection will occur within three (3) months of the Cooperative Agreement being secured. Contractor selection will occur after consultant selection, and bidding is completed, and within six (6) months of securing the Cooperative Agreement, with work beginning immediately thereafter. Oversight and supervision of the grant and the remaining activities will occur concurrently throughout the grant period.
iii. Task/Activity Lead: The Superintendent will be the lead for the remediation task and report to the school board relating to progress and compliance. All work will follow federal procurement guidelines and an open bidding process. The consultant will assist the superintendent in all areas.

iv. Outputs: Document consultant and contractor selection, complete bi-monthly (every-other) meetings with EPA representatives throughout the grant period (up to 12 meetings), document outputs for all tasks under the Grant, ACRES reporting, and a final report.
<b>Task/Activity 2: Clean-up</b>
i. Project Implementation: The Consultant will prepare a Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP), and a Final Analysis of Brownfield Cleanup Alternatives (ABCA) for submission and approval by the US EPA. Also, implement the clean-up plan, all required documentation, and enrollment in the Colorado Voluntary Clean-up Program.
ii. Anticipated Project Schedule: Documents will be submitted 3 months after the consultant is selected. Cleanup and contractor bidding will occur within 3 months of the final ABCA by the US EPA. CDPHE submittal of the cleanup plan will occur 30 days after EPA approval.
iii. Task/Activity Lead: The consultant, under the direction of the Superintendent.
iv. Outputs: Final ABCA, QAPP, HASP, and CDPHE clean-up plan and remediation of ACM and LBP.
<b>Task/Activity 3: Community Engagement</b>
i. Project Implementation: Meetings with the school board as well as the community regarding updates and reuse refining. Flyers, social media, news articles, and community forums.
ii. Anticipated Project Schedule: BSD School Board - monthly updates, District Accountability Committee - Monthly updates, Community and youth engagement - ongoing.
iii. Task/Activity Lead: The DAC assisted by the superintendent and the consultant.
iv. Outputs: School Board reports, DAC reports, social media posts, flyers, and articles.

**C.3.f. | Cost Estimates**

C.3.f. | Cost Estimates

Direct Costs	Task 1	Task 2	Task 3	Total
	Grant Administration	Cleanup	Community Engagement	
Personnel/Fringe/Travel	\$17,182.24	\$0	\$0	\$17,182.24
Equipment/Supplies	\$0	\$0	\$0	\$0
Contractual	\$24,323	\$972,900	\$0	\$997,223
<b>Total</b>	<b>\$41,505.24</b>	<b>\$972,900</b>	<b>\$0</b>	<b>\$1,014,405.24</b>

Task 1 Grant Administration: Superintendent's time and Public Employees' Retirement Association of Colorado (PERA) and Medicare for grant administration and management. Salary (\$59.85/hr \* 200 hours = \$11,970), PERA and Medicare (\$13.68/hr \* 200 hours = \$2,736), Total = \$14,706. Business Manager time and PERA and Medicare for financial reporting. Salary (\$38.76/hr \* 52 hours = \$2,015.52), PERA and Medicare (\$8.86/hr \* 52 hours = \$460.72), Total = \$2,476.24. A consultant to assist with all the specialized permitting and coordination on cleanup at 2.5% of cleanup costs (\$972,900 \* .025 = \$24,323. Task 2 Cleanup: The cleanup cost is a 15% increase over 2024 ABCA costs due to inflation and rising costs. \$846,000 \* 1.15 = \$972,900. Task 3 Community Outreach: To be completed by the school district, the District Accountability Committee, and community partners through in-kind services.

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

BSD's work plan will include a detailed schedule of key project milestones. At least monthly, BSD will track and evaluate progress toward achieving outputs and milestones against the work plan schedule and will also communicate with the QEP and project contractors. BSD will increase monitoring and communication during the active cleanup phase to quickly address unexpected changes and to monitor the project budget. Quarterly progress reports to EPA and in EPA's ACRES database will be completed. Anticipated outcomes and results to be tracked include reduced volumes of hazardous materials, leveraged funding, protected historic resources, and community engagement.

**C.4.a. | Organizational Structure**

BSD is overseen by the Burlington School Board. The Superintendent and the Business Manager will have vital roles in the success of this project. Should one of them leave during this project, their successor will fill the role.

The Superintendent will handle all aspects of the grant, including bidding items, reports, and overall

management. They will be the direct contact for the consultant hired to help manage the project.

The business manager will be responsible for all fiscal and budgetary reporting and for ensuring compliance with all federal and state financial reporting requirements.

The DAC, a group of parents and BSD staff committed to advancing the goals and mission of the school.

DAC will be vital in the community outreach plan. Many community members have reached out during this process as well and want to be part of the outreach committee and any other needed efforts.

BSD has had several successful construction projects, including a grant and loan to overhaul the HVAC system in 2019; a Building Excellent Schools Today (BEST) grant to replace all entryways for safety and to replace surveillance equipment due to Chinese equipment, and a kitchen overhaul with the Healthy Meals Incentive (HMI) grant for walk in fridge and freezer.

In order to manage these grants, BSD has utilizing BEST grant templates and GAINS online system. Due to the variety of funding sources BSD has utilized, the business manager is well-versed in multiple reporting systems. Aptfund 501 is currently used as the fiscal reporting system. BSD complies with all state and federal accounting regulations. There is a yearly audit by an external auditor.

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

Superintendent, Shane Walkinshaw - Shane has over 14 years of experience overseeing construction projects with general contractors in school districts, and manages a \$23,826,074 budget. Shane has a Bachelor's Degree in Kinesiology and a Master's in Educational Leadership. Based on his experience, he has successfully completed all grants with respect to financial and outcome measures. He will be primarily responsible for grant administration, including reporting and working with the consultant to ensure grant activities are successfully carried out. He will also provide support in community engagement.

Business Manager, Rina Barkhuizen - Rina has been with the Burlington School District since 2022. She has been a Certified Senior Bookkeeper since 2012 and has over 30 years of experience in finance. She manages around 20 grants per year, as well as the district's other financial responsibilities. She is well-versed in several reporting systems due to the variety of grants the school district has received. She will be responsible for the financial reporting aspects of the grant.

The District Accountability Committee will be integral in the community outreach for this grant. The DAC has been around for 5 years. They have had a very successful community outreach campaign regarding Colorado State Testing, resulting in a significant increase in the number of students who test. Their outreach has been conducted through social media, newspapers, radio, and other platforms. The Burlington Gymnasium will be a subcommittee of the group and will include community members who have reached out exclusively to express their desire to be involved in this project. The DAC will serve as the lead for community engagement, communication, and input.

Should the superintendent or business manager leave, their successors will take over their responsibilities. To ensure the necessary skills are possessed, questions about abilities will be part of the interview process. DAC is a required committee of the school, and with the community involvement, this group will have a variety of people who could take the lead.

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

When expending EPA funds to acquire services, BSD will use a qualifications-based selection process that meets or exceeds state and federal procurement requirements (2 CFR § 200). District policy, DJE and DJB-R, exists to ensure that multiple bids are considered for cost and quality. This procedure was applied to projects completed under the BEST grant and to the Elementary and Secondary School Emergency Relief Fund III (ESSER III), which required following federal guidelines. The district has a working relationship with multiple construction contractors that operate in the State of Colorado.

BSD will also leverage community support and expertise, as outlined in Section C.2.f, and will use services provided by the TAB Program.

#### **C.4.d.1 | Accomplishments**

N/A

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

N/A

#### **C.4.e.1. | Purpose and Accomplishments**

Burlington School District RE-6J has met all compliance and reporting requirements for grants received over the past five years. All required reports, financial documentation, and supporting records have been submitted on time through appropriate grant management systems. The district has successfully

administered grants with regulatory and reporting requirements comparable to the EPA Brownfields Cleanup Grant, including ESSER III, BEST, and HMI.

The district managed a \$1,505,688 ESSER III grant and a \$640,899 BEST grant through the Colorado Department of Education from 2022–2025. ESSER III required a single audit, which the district passed with no findings. Required interim and annual financial reports, progress reports, reimbursement documentation, and closeout materials were completed on time for both grants.

ESSER III, BEST, and food service funds were combined to complete districtwide capital improvement projects, including kitchen renovations to meet health codes, building security upgrades, exterior door replacements with controlled access systems, and competitively procured preconstruction and design services. Some of the renovations required abatement and energy-efficient upgrades were completed. Design services were procured through a competitive bidding process in compliance with federal guidelines and board policy to develop project scope, plans, and budgets. One scope modification required corrective action due to differing grant requirements; the district worked directly with the state to resolve the issue, contributed local funds as needed, and closed the grants with no negative findings.

The district also administered a \$150,000 HMI grant (2023–2025) through the USDA in partnership with Action for Healthy Kids, which required biannual performance and financial reporting, as well as regular progress reporting. Funds supported the installation of new cold storage equipment and kitchen improvements. All reports were submitted on time, and the grant was closed out in full compliance with no findings. BSD was awarded an Innovation of Preparation of School Meals during this grant.

#### **C.4.e.1 | Compliance with Grant Requirements**

Burlington School District RE-6J has consistently met compliance, reporting, and financial management requirements for all grants received over the past five years. The district has successfully managed grants with regulatory and reporting structures comparable to the EPA Brownfields Cleanup Grant, including ESSER III, BEST, and Action for Healthy Kids.

For these grants, the district submitted required interim and annual financial reports, supporting documentation, and progress reports through state and grant management systems. Reimbursement-based expenditure procedures were followed, closeout documentation was completed on time, and assigned agency liaisons worked with district staff to ensure compliance with all deadlines and requirements, including Davis-Bacon labor standards where applicable.

During a capital project funded through ESSER III and BEST, one scope modification required corrective action when a change approved under one funding source was not approved under the other. The district worked directly with the Colorado Department of Education to resolve the issue, contributed additional local funds to complete the project, and successfully closed the grant with no negative findings. Coordinating and combining three funding sources—ESSER III, BEST, and Food Service—proved to be extremely complex. HMI required biannual performance and financial reporting, all of which were submitted on time. The grant was completed and closed out with no negative findings.

#### **C.4.f. | Never Received Any Type of Federal or Non-Federal Assistance Agreements**

N/A

## **Threshold Criteria for Cleanup Grants**

### **1.a. | Applicant Eligibility**

The Burlington School District is a local public school district in Burlington, CO, and therefore, is eligible to apply for this grant. Documentation of my organization's status is attached as **Exhibit E**.

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

BSD is exempt from federal taxation, and the Burlington School District does not lobby the Federal government.

### **2 | Previously Awarded Cleanup Grants**

I affirm that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

### **3 | Expenditure of Existing Multipurpose Grant Funds**

I affirm that the Burlington School District does not have an EPA Brownfields Multipurpose Grant.

### **4 | Site Ownership**

I affirm that the Burlington School District is the owner of the proposed site, the Burlington Gymnasium at 11th St.

### **5 | Basic Site Information**

a) Burlington Gymnasium

b) 450 11th St., Burlington, CO 80807

### **6 | Status and History of Contamination at the Site**

The Burlington Gymnasium is contaminated by hazardous substances, specifically asbestos-containing materials (ACM) and lead-based paint (LBP). No petroleum contamination has been identified at the site. Environmental investigations conducted through EPA Region 8's Targeted Brownfields Assessment (TBA) program confirm the presence of hazardous substances at levels that pose risks to human health and the environment and require remediation before reuse.

BSD has owned the property on which the gym sits since the 1890s. The Burlington Gymnasium was constructed between 1938 and 1941 as part of a Works Progress Administration (WPA) project and historically served as a school gymnasium, auditorium, cafeteria, and community gathering space. The building played a central role in school activities and community events for several decades.

Due to increasing environmental concerns, the building was vacated in 1999 and has since remained largely unused, with intermittent, limited storage use. The building is currently closed and inaccessible due to known asbestos and lead hazards and deteriorating conditions. Although secured, the structure remains within an active elementary school campus and adjacent to student activity areas and elderly and disabled public housing.

Environmental concerns at the site include extensive asbestos-containing materials, widespread lead-based paint, and suspected mold associated with water intrusion. These contaminants are present throughout the building and affect multiple structural and architectural components.

Asbestos-containing materials were identified in flooring systems, window glazing and caulking, pipe insulation, joint compound, and roofing materials. Several of these materials are friable or likely to become friable if disturbed, increasing the risk of airborne asbestos exposure. Lead-based paint was detected on numerous interior surfaces, including doors, beams, walls, decorative elements, drinking fountains, and gym equipment. Visible water damage and suspected mold growth were observed in basement areas and near the roof structure, further compounding environmental and health concerns.

The contamination at the Burlington Gymnasium is directly related to the building's age, historic construction practices, and long-term use followed by extended vacancy. In pre-1978 public buildings, asbestos and lead-based materials were commonly used for fire resistance, durability, and insulation. These materials were incorporated into floors, walls, windows, mechanical systems, and decorative features during original construction and subsequent renovations.

The nature and extent of contamination are well documented through EPA-funded assessments. Asbestos-containing materials were found throughout the building, with laboratory analysis identifying 2–7 percent chrysotile asbestos in multiple materials. Asbestos fibers were also detected in dust wipe samples collected from stored equipment, confirming existing exposure pathways. Lead-based paint testing identified concentrations ranging from 1.01 mg/cm<sup>2</sup> to 14.20 mg/cm<sup>2</sup>, significantly exceeding regulatory thresholds and indicating widespread contamination across interior surfaces.

Long-term vacancy, deferred maintenance, broken and boarded windows, and water intrusion have contributed to the deterioration of these hazardous materials, increasing the likelihood of exposure. The extent of contamination affects nearly all levels of the building, including the basement, main floor, balcony, and roof system, and represents a substantial barrier to reuse without comprehensive cleanup.

#### **7 | Brownfield Site Definition**

**The Burlington School District RE-6J affirms** that 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.

#### **8 | Environmental Assessment Required for Cleanup Applications**

Through the EPA Region 8 Technical Brownfields Assessment, a Draft Asbestos and Lead-Based Paint Inspection Report - July 5th, 2024, Final Cleanup Planning and Cost Estimate - September 8th, 2024, and Final Analysis of Brownfields Cleanup Alternatives - October 30, 2024 were prepared.

#### **9 | Site Characterization**

The applicant is not a state or tribal environmental authority, but proposes to enroll in the Colorado Department of Public Health and Environment (CDPHE) Voluntary Cleanup Program (VCUP). See enclosed letter from Kathleen Knox, Brownfields Coordinator, CDPHE, stating, “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.” – **Exhibit G**

While not anticipated, if additional assessment is needed, BSD affirms that there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2026, for the remediation work to begin on the site(s). See enclosed letter from Kathleen Knox, Brownfields Coordinator, CDPHE, stating, “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 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.” – **Exhibit G**

#### **10 | Enforcement or Other Actions**

**The Burlington School District RE-6J affirms** there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

#### **11 | Sites Requiring a Property-Specific Determination**

The proposed site does not require a property-specific determination.

#### **12 | Threshold Criteria Related to CERCLA/Petroleum Liability**

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

The Burlington Gymnasium qualifies for funding because the property is publicly owned; was acquired prior to January 11, 2002; and the applicant has not caused or contributed to a release or threatened release of hazardous substances at the property.

##### **12.a.ii | Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability**

a. Due to the length of time since the property was acquired, there is no known knowledge regarding the circumstances that the property was acquired.

b. The property on which the Burlington Gymnasium is located was purchased January 19th, 1890 for \$5 from D. Carnahan. Additional land was purchased on August 30th, 1906 from Annie Newell for \$1 and other valuable considerations. Since that time, the property has remained in the school district's possession. Since construction of the building began in 1938, the school district has always owned it.

c. There is no known knowledge that there was disposal of hazardous material. Access to the building is currently restricted to 2 keys to 2 people, the superintendent and head of maintenance. An asbestos management plan is in place. Any broken windows are boarded up, with plans to board all windows to

prevent any release of hazardous material. A rope line exists on the playground to keep students away from the building, and strictly enforced when children are present.

d. Burlington School District Affirms it has not caused or contributed to any release of hazardous substances at the site.

e. BSD **affirms** that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**12.a.iii. | Landowner Protections from CERCLA Liability**

NA

**12.a.iii.1 | Bona Fide Prospective Purchaser Liability Protection**

NA

**12.a.iii.1.a | Information on the Property Acquisition**

**12.a.iii.1.b | Pre-Purchase Inquiry**

NA

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

NA

**12.a.iii.1.d | Post-Acquisition Uses**

NA

**12.a.iii.1.e | Continuing Obligations**

NA

**12.a.iii.2 | Non-Publicly Owned Sites Acquired Prior to January 11, 2002**

NA

**12.a.iv. | Sites with hazardous building material that is not released into the environment**

BSD affirms that there has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions.

**12.b.i | Information Required for a Petroleum Site Eligibility Determination**

NA

**12.b.i.1 | Current and Immediate Past Owners**

NA

**12.b.i.2 | Acquisition of Site**

Na

**12.b.i.3 | No Responsible Party for the Cleanup of the Site**

NA

**12.b.i.4 | Cleaned Up by a Person Not Potentially Liable**

NA

**12.b.i.5 | Judgments, Orders, or Third Party Suits**

NA

**12.b.i.6 | Subject to RCRA**

No

**12.b.i.7 | Financial Viability of Responsible Parties**

NA

**13 | Cleanup Authority and Oversight Structure**

**13.a | Cleanup Oversight**

Burlington School District plans to enroll in the CDPHE Voluntary Cleanup Program and will engage a qualified environmental professional to advise on the cleanup plan, to procure qualified abatement contractors, and to ensure that all applicable federal and state laws are followed so that the project protects human health and the environment.

**13.b | Access to Adjacent Properties**

Access to adjacent properties is not needed.

**14 | Community Notification**

See **Exhibit B** and **Exhibit C**

**14.a | Draft Analysis of Brownfields Cleanup Alternatives**

Burlington School District affirms that a draft ABCA has been completed for this cleanup grant application.

See **Exhibit F**

**14.b | Community Notification Ad**

A community notification was published online through the district’s website and on social media. Flyers were posted around town in Spanish and English. The flyer indicated the following:

- that a draft copy of the EPA Brownfield Cleanup Grant application, including the draft ABCA(s), was available for public review and comment;
- how to comment on the draft proposal;
- where the draft proposal could be accessed; and
- the date and time of the public meeting.

A copy of the flyers and forms of public notice is provided as **Exhibit B**

#### **14.c | Public Meeting**

Burlington School District discussed the draft proposal and considered public comments during a public meeting held on January 13<sup>th</sup>, 2026. Required meeting materials are provided in **Exhibit C**.

#### **14.d | Submission of Community Notification Documents**

Community notification documents are provided as indicated below.

- Draft ABCA – **Exhibit F**
- Community Notification Ad – **Exhibit B**
- Summary of Meeting, Comments, Responses, and Participant List – **Exhibit C**

#### **15 | Contractors and Named Subrecipients**

No contractors have been selected for the preparation of this application. Any contractors who will perform work under the grant will be procured in compliance with federal procurement policy and the terms and guidelines of the US EPA Cleanup Grant.

No subrecipients have been or are expected to be named under the grant.

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: Burlington Gymnasium - FY26 Cleanup Grant Application

Dear Ms. Devincenzi:

I am writing to acknowledge and express the Colorado Department of Public Health and Environment's (CDPHE) support of Burlington School District's FY 2026 Brownfields Cleanup Grant application for the Burlington Gymnasium located at 450 11<sup>th</sup> Street, Burlington, Colorado. Cleanup of this historic site located within the Burlington Elementary School Campus would not only address an environmental hazard, but allow the site to be revitalized and returned to a much-needed space for education, recreation, and community gatherings.

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 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 Burlington School District, 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 Burlington School District of the availability of these resources and can assist with the application process if requested.

In closing, I again want to express CDPHE's support for the Burlington School District's Grant proposal that will allow the cleanup and revitalization of this important community asset.

Sincerely,



Kathleen Knox  
Brownfields Coordinator  
Hazardous Materials and Waste Management Division

cc: Jessica Schart, Kit Carson County  
Shane Walkinshaw, Burlington School District

