

Phase I Environmental Site Assessment for:

Old Towaoc Dining Hall and Associated Tunnels

I. EXECUTIVE SUMMARY

A Phase I Environmental Site Assessment (ESA) for the Old Towaoc Dining Hall and Associated Tunnels has been completed by Mary Ahlstrom, a contractor who wrote the report for the Environmental Program of the Ute Mountain Ute Tribe. The purpose of this document is to review previous assessment and sampling activities that occurred at the Dining Hall and recommend if further sampling activities should be conducted prior to the cleanup, demolition, and proper disposal of the building. It is also to recommend if sampling should be conducted on the Utility Tunnels associated with the Dining Hall.

The old Towaoc Dining Hall and associated utility tunnels are located in the Central Square, Towaoc, Montezuma County, Colorado. The property is on the Ute Mountain Ute Reservation on Tribal Trust land.

Tom Rice, the Tribal Environmental Director, provided the contractor with documents related to assessment and sampling activities conducted by Envirotech, a contractor hired by the Tribe in the past. A site reconnaissance and historical review were conducted, in coordination with the Tribal Environmental Director, to review the site for indications and/or the presence of recognized environmental conditions.

Envirotech provided the Tribe with a document that summarized the inspection and sampling for the Old Dining Hall. Asbestos was found to be throughout the building including the floor tile and mastic in two bathrooms on the top floor, all of the insulated pipe and boiler vessels in the basement, and the roof shingles.

From observations, an interview with the Tribal Environmental Director, and documentation provided by Envirotech, it is recommended that further sampling be conducted for the Utility Tunnels associated with the Dining Hall as the potential exists that asbestos insulation may have been used around piping. It is also recommended that sampling be conducted for areas that are not exposed such as behind walls, ceiling, and under the floors. Additionally, sampling should be conducted for lead-based paint as it would have been a typical product used during the period that the dining hall was functioning.

II. INTRODUCTION

A. Purpose

The purpose of this document is to review previous assessment and sampling activities that occurred at the Old Towaoc Dining Hall and recommend if further sampling activities should be conducted prior to cleanup, demolition, and proper disposal of the building. It is also to recommend if sampling should be conducted in the Utility Tunnels associated with the Dining Hall.

B. Scope of Work

1) Review available public records/documents that will help identify recognized environmental conditions in connection with the property.

2) Conduct a site reconnaissance to collect data and observe environmental conditions related to the property and any structures located on the premises to the extent not obstructed by adjacent buildings, bodies of water, asphalt, other paved areas, or by limiting conditions such as snow or rain.

3) Interview site-owner, occupants, or designated persons to review property boundaries and obtain information that may be relevant to the site or adjoining land. Briefly interview knowledgeable persons (i.e. neighbors, former owners, regulatory agencies) to establish previous property uses and conditions.

4) Prepare a report containing observations relating to the apparent environmental condition of the site, describing areas of impact, summary of records/documents reviewed, analysis of collected data, and the consultant's conclusions.

The scope of this report is limited to the matters expressly covered. This report is prepared for the benefit of the Ute Mountain Ute Tribe.

Radon, lead in drinking water, wetlands, regulatory compliance, industrial hygiene, ecological resources, endangered species, indoor air quality, and high voltage power lines were not included in the scope of this assessment.

C. Methodology

The methodology followed was the American Society for Testing Materials (ASTM) Practice E 1527-00: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. ASTM is a national standards-writing organization based in Philadelphia, Pennsylvania. This practice outlines a methodology to complete an ESA for commercial real estate in the United States. Its purpose is to identify "recognized environmental conditions" of contamination by hazardous materials and petroleum products, and as such, defines what constitutes appropriate inquiry to qualify for the innocent landowner defense of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

D. Limitations and Exceptions

The preparation of this report relied on information derived from secondary sources. Except as set forth in this report, there was no independent investigation as to the accuracy or completeness of the information derived from secondary sources or personal interviews and has assumed that such information is accurate and complete.

The conclusions and recommendations in this report represent opinions, which are based upon facts and circumstances as they existed at the time that this report was prepared. These opinions were arrived at in accordance with currently accepted engineering, hydrologic, and geologic practices and are subject to the inherent limitations of environmental site assessments. A change in any fact or circumstance upon which this report is based may adversely affect the recommendations, findings, and conclusions expressed in this report.

No environmental site assessment can completely eliminate uncertainty regarding the potential for "recognized environmental conditions" in connection with these sites. Within reasonable limits of time and cost, an assessment conducted according to ASTM standards is intended to reduce uncertainty regarding the potential for contamination on the site.

No sampling of any materials was performed for this assessment.

III. SITE DESCRIPTION

A. Location

The old Towaoc Dining Hall and associated utility tunnels are located in the Central Square, Towaoc, Montezuma County, Colorado. The property is on the

Ute Mountain Ute Reservation on Tribal Trust land. The Latitude is N 37°12'4.2" and the Longitude is W 108°43'49.3".

B. Past and Present Uses

The Old Towaoc Dining Hall and associated utility tunnels were built in the 1930's by BIA. The building was used to hold community dinners, fund raising events, youth fairs, Tribal elections, and for other special occasions. In the 1950's, BIA transferred the building to the Tribe. This information was obtained through interviews as a search was not able to locate construction or transfer documentation.

The Ute Mountain Ute Reservation was established in 1897 and is homeland to the Weeminuche Band of Utes. The present day Reservation encompasses 597,288 acres of trust land and 27,354 acres of fee land. It is located in Montezuma and La Plata Counties in southwestern Colorado, and San Juan County in northwestern New Mexico. It also includes a small section of San Juan County in southeastern Utah where individually and Tribal owned lands or allotments are located in White Mesa and Allen Canyon. Elevations range from 4,600 feet along the San Juan River to 9,977 feet on Sleeping Ute Mountain. The eastern half of the Reservation is characterized by a high mesa cut by the canyon of the Mancos River and numerous side canyons. The western half, with the exception of Sleeping Ute Mountain, is semi-desert and grassland.

The area is known as the Four Corners (where four states come together) and is rich in culture and history. There is the prehistory of "The Anasazi" the ancient ones, who lived here nearly 1000 years ago. They left the area long before the Ute Bands and the Plains Indians roamed the mountains and vast plains. Historically, the Ute Nation roamed throughout Colorado, Utah and northern New Mexico in a hunter-gather society, moving with the seasons for the best hunting and harvesting. The Ute Bands were forced onto Reservations in the 1800's.

Tribal enrollment of the Ute Mountain Ute Tribe is at 2029 members and the 2000 Census list 1,676 people living on the Reservation. Most of the people live in two communities on the Reservation, the Tribal Headquarter City of Towaoc with a population of about 1,097 and the smaller community of White Mesa with a population of approximately 277.

C. Previous Assessment Activities

Tom Rice, the Tribal Environmental Director, provided the contractor with documents related to assessment and sampling activities conducted by Envirotech, a contractor hired by the Tribe in the past. On August 2, 2003, Envirotech provided the Tribe with a document that summarized the inspection

and sampling for the Old Dining Hall. Envirotech representative, Mr. Morris D. Young, AHERA Colorado Certified Building Contractor and Supervisor (No. 6726), inspected the Old Dining Hall for Asbestos Containing Materials (ACM). On the main floor, tile was sampled from two bathrooms and the main dining hall. Wall texture was also sampled in the dining hall. In the basement/crawlspace, thermal pipe insulation was sampled in the crawlspace and from the pipes and vessels in the old boiler area. The building roof transite shingles were also samples. Samples were sent under Chain of Custody to EMC Laboratories in Phoenix, Arizona, a certified NVLAP Certified Asbestos Analytical Laboratory. In summary, both bathrooms on the top floor contained asbestos floor tile and/or mastic. All of the insulated piping and boiler vessels in the basement contained asbestos and the entire building was roofed with asbestos tile shingles.

D. Site Vicinity and Characteristics

The Old Dining Hall and utility tunnels are surrounded by Tribal administrative and public buildings. To the north is a remodeled recreation center. On the west is the Tribal Environmental office. The Pow Wow Ground is located directly south of the site and a Head Start Daycare is 330 feet southwest. To the east is a public common area, about the size of a rectangular block and similar to a central park surrounded by a road and buildings. It contains a park and spaces to park vehicles. East of the park are Tribal administrative buildings. Approximately 500 people work within ¼ mile of the site in the administrative area. Prior to construction of the Old Dining Hall and associated utility tunnels, a traditional Tribal home occupied the site.

Towaoc is supplied with a public water system and receives treated water from Cortez, Colorado, which the Tribe treats again. Private livestock wells are in the area with the closest being located about one mile down-gradient to the south. Wastewater and sewage is processed through two lagoons about one mile southeast of Towaoc.

The Ute Mountain Ute Reservation was established in 1897 as is homeland to the Weeminuche Band of Utes. The present day Reservation encompasses 597,288 acres of trust land and 27,354 acres of fee land. It is located in Montezuma and La Plata Counties in southwestern Colorado, and San Juan County in northwestern New Mexico. It also includes and a small section of San Juan County in southeastern Utah where individually and Tribal owned lands or allotments are located in White Mesa and Allen Canyon. Elevations range from 4,600 feet along the San Juan River to 9,977 feet on Sleeping Ute Mountain. The eastern half of the Reservation is characterized by a high mesa cut by the canyon of the Mancos River and numerous side canyons. The western half, with the exception of Sleeping Ute Mountain, is semi-desert and grassland.

The area is known as the Four Corners (where four states come together) and is rich in culture and history. There is the prehistory of “The Anasazi” the ancient ones, who lived here nearly 1000 years ago. They left the area long before the Ute Bands and the Plains Indians roamed the mountains and vast plains. Early Spanish priests and travelers introduced horses to the Ute people. There are historical chronicles of early settlers who came here to the lush and fertile Montezuma Valley instead of going further west. Historically, the Ute Nation roamed throughout Colorado, Utah and northern New Mexico in a hunter-gather society, moving with the seasons for the best hunting and harvesting. The Ute Bands were forced onto Reservations in the 1800’s.

Tribal enrolment of the Ute Mountain Ute Tribe is at 2029 members and the 2000 Census list 1,676 people living on the Reservation. The Tribe employs over 900 people in its enterprises and departmental programs. Others are employed in ranching operations throughout the Reservation. The unemployment rate is approximately 40%. Most of the people live in two communities on the Reservation, the Tribal Headquarter City of Towaoc with a population of about 1,097 and the smaller community of White Mesa with a population of approximately 277. Towaoc is at the base of Sleeping Ute Mountain, which resembles a sleeping Indian with his head to the north. Towaoc is sixteen miles southwest of Cortez, Colorado and just over an hour north and west of Farmington, New Mexico. Within the Reservation, is the 125,000 acre Ute Mountain Tribal Park along a 25-mile stretch of the Mancos River, which was set aside by the Tribe to preserve remnants of the Hisatsinom Culture and is kept as a primitive area.

The community of White Mesa in San Juan County, Utah is separated from the main portion of the Reservation is located nine miles south of Blanding, Utah near Indian Highway 35. Nearby are the individual and Tribal allotments in Allen Canyon, which are located twelve miles west of Blanding and adjacent to the Manti-La Sal National Forest.

E. Structures, Roads, and Utilities

Highways on the Reservation are U.S. Highways 160 and 491; and Colorado State Highways 41 and 789. Two maintained gravel roads cross the Reservation; one follows the Mancos River Canyon to the eastern part of the Reservation then southward toward Farmington; the other goes westward from Towaoc to the Cache oil field then on to Aneth, Utah. White Mesa can be reached from Utah cities and communities of Aneth, Montezuma Creek, Red Lake Village, White Rock Curve Village, Red Mesa, Bluff, and Blanding. U.S. Highway 191 runs approximately fifteen miles west of White Mesa, U.S. Highway 163 runs about five miles north, and U.S. 106 runs about twelve miles south. U.S. Highways 163, 195 and 262 run about ten miles north of White Mesa.

F. Environmental Liens

The abstract for the properties were not available for review. No indications were made that there are environmental liens on the site.

IV. RECORDS REVIEW

A. Environmental Record Sources

An environmental review was conducted of Tribal, U.S. EPA, other Federal, and State agency databases.

Tribal

The Tribe removed underground storage tanks at a former gas station at Highways 491 (formerly Highway 666) and 160 in about 1999. The Tribe paid for the removal and disposal costs.

Colorado

The State of Colorado does not maintain a public list of UST and LUST sites.

No information was recorded for Montezuma County in the EPA databases for RCRIS, and ERNS.

**Below is a table of EPA-REGULATED FACILITIES
IN ENVIROFACT in Montezuma County, Colorado**

FACILITY NAME/ADDRESS	FACILITY INFORMATION	Permitted Discharges to Water?	Toxic Releases Reported?	Hazardous Waste Handler?	Active or Archived Superfund Report?	Air Releases Reported?
CORN CONSTRUCTION CO 1/4 MILE NORTH OF TOWAOC TOWAOC, CO 81334	View Facility Information	NO	NO	YES	NO	NO
TOWAOC DAYCARE SITE UTE MOUNTAIN UTE RESERVATION OFFICE TOWAOC, CO 81334	View Facility Information	NO	NO	NO	YES	NO
TOWAOC WASTEWATER LAGOONS UTE MOUNTAIN 201 (BIA ROAD#) TOWAOC, CO 81334	View Facility Information	YES	NO	NO	NO	NO
US EPA - UTE DRUMS 20 MILES SOUTH OF TOWAOC TOWAOC, CO 81334	View Facility Information	NO	NO	YES	NO	NO
UTE DRUM 11.5 MI S OF TOWAOC & 1 MI W OF HWY 164 TOWAOC, CO 81334	View Facility Information	NO	NO	NO	YES	NO