



Public Health

September 22, 2008

Ref: LU-08-055

Hannah Hippely, Planner I
Boulder County Land Use

RE: Docket SU-08-008: Palmer multiple principal uses SU/SSDP

Dear Hannah:

The materials for the above referenced proposal have been reviewed. It is understood the request is a special use and site specific development plan review for multiple principal uses. The property is located at 6185 Arapahoe Road, S27 T1N R70W. We have the following comments to offer:

Water Supply

Water is supplied by the City of Boulder.

Wastewater Treatment

Wastewater Treatment is supplied by the City of Boulder.

Building Renovation or Demolition

Colorado Air Quality Control Commission, Emission Standard for Asbestos, Regulation Number 8, Part B – Emission Standards for Asbestos requires asbestos containing building materials be removed before prior to any **renovation or demolition** in any public, commercial, or single family dwelling. The trigger levels for the regulation are 260 linear feet, or 160 ft², or the contents of a fifty-five gallon drum of an asbestos building material. Asbestos has not been banned from household building materials so testing is required on all demolitions to exclude it.

Asbestos demolition permits are required for all buildings/structures. The applicant should contact a Colorado Department of Public Health and Environment (CDPHE) certified Asbestos Inspector, who will guide you through an asbestos abatement process if necessary. A list of certified inspectors can be provided upon request from Boulder County Public Health. Some cities and county building departments require demolition permits also.

Regardless of the size or category of a project, operators of demolition activities must prevent dust from drifting off property at all times. Control measures or operational procedures may include, but are not limited to, hand dismantling, wetting down or prewatering of work surfaces, removal of dirt and mud tracked onto roads, and wetting, washing, or covering haulage equipment.

Demolition projects that produce more than 1000 tons (667 cu yds) of debris require an Air Emissions Permit from the Colorado Department of Public Health and Environment (CDPHE). Demolition Permit applications can be obtained from CDPHE or Boulder County Public Health.

Lead

Colorado Air Quality Control Commission, Lead Based Paint Abatement, Regulation Number 19 requires removal of the affected lead paint in any structure prior to renovation that was constructed prior to 1978, and is regularly visited by a child under 7 YOA. The trigger levels are greater than 2 ft² of an interior painted surface, and greater than 20 ft² of an exterior. Even if the dwelling is not to be frequented by a child of less than 7 YOA, a lead inspection and abatement is a prudent preventative measure since in addition to children, pre adolescents, adolescents, and adults all are harmed by exposure to lead dust from

Administration/Environmental Health • 3450 Broadway • Boulder, CO 80304 • 303-441-1100

Boulder (Sundquist) • 3482 Broadway • Boulder, CO 80304 • 303-413-7500 (mailing address: 3450 Broadway)

Addiction Recovery Center (ARC) • 3470 Broadway • Boulder, CO 80304 • 303-441-1275 (mailing address: 3450 Broadway)

Longmont • 529 Coffman, Suite 200 • Longmont, CO 80501 • 303-678-6166

Lafayette • 1345 Plaza Ct. N., Suite 3A • Lafayette, CO 80026 • 303-666-0515

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a renovation involving lead based paint. A lead based paint is a paint that contains greater (>) than 0.5% Lead, or > 5,000 ppm by weight, or >1.0 ug/cm2 by X ray Fluorescence. Lead was removed from household paint in 1978.

A CDPHE certified Lead Inspector should be contacted to guide you through a lead abatement process if necessary. A copy of the Colorado Lead Resource Guide can be provided upon request from Boulder County Public Health.

Land Disturbance

Disturbance of surface areas for the purpose of land development, which exceed 25 contiguous acres and/or six (6) months in duration shall be subject to the requirements of the Colorado Air Quality Control Commission's Regulation No. 3, which requires an Air Pollution Emission Notice with fee be submitted prior to the property's surface area being disturbed. Any owner or operator engaged in clearing or leveling of land or owner or operator of land that has been cleared of greater than five (5) acres in attainment areas or one (1) acre in non-attainment areas from which fugitive particulate emissions will be emitted shall be required to use all available and practical methods which are technologically feasible and economically reasonable in order to minimize such emissions. Appropriate controls may include, but are not limited to watering, vegetation, synthetic cover, chemical stabilization, furrows, compacting, and other methods or techniques approved by Public Health.

The Land Development APEN/Dust Control Plan can be found at:

<http://www.cdphe.state.co.us/ap/downpermitforms/APENLandDevelopment.pdf>

Regulations Numbers 1 & 3 can be found at: www.cdphe.state.co.us/regulations/airregs

Stormwater Management

A stormwater discharge permit is required for all construction activities that disturb one or more acres of land, as well as activity that disturbs less than one acre but is part of a larger common plan of development. The owner or operator must obtain a Colorado Stormwater General Permit for Construction Activities and comply with local requirements. If there is a need to dewater the site, the owner or operator must obtain a Construction Dewatering Permit from the state and permission from the municipality to discharge to the storm drainage system. The Colorado Water Quality Control Division provides information on Stormwater Permits and can be contacted at 303-692-3500.

Radon

The Rocky Mountain Region has been ranked as a Zone 1 area for radon by the Environmental Protection Agency. A Zone 1 area has the highest radon potential possible. Radon is also listed as a Group A carcinogen and is definitely known to cause cancer in human beings. It is recommended that all new dwellings and buildings be built using EPA recommended Radon-Resistant Construction Techniques. Existing buildings should be tested for radon and mitigated if necessary. Information on these construction techniques can be provided by Boulder County Public Health upon request.

If you have any questions, please feel free to contact me at (303) 441-1157.

Sincerely,



Iris Sherman-Boemker
Environmental Health Specialist

cc: Chuck Palmer, owner