

Analysis of Brownfield Cleanup Alternatives

East Pecos School Building
66 County Road B51A
Pecos, New Mexico 87552



September 2024
Brownfields Agreement: 4W02F24801

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Acronyms

ABCA	Analysis of Brownfield Cleanup and Alternatives
ACM	asbestos-containing material
AHERA	Asbestos Hazard Emergency Response Act
APE	Area of Potential Effects
CFR	Code of Federal Regulations
ESA	Environmental Site Assessments
f/cc	fibers per cubic centimeter
HUD	The Department of Housing and Urban Development
LBP	lead-based paint
LCP	lead-containing paint
MAP	Model Accreditation Plan
NESHAP	National Emission Standard for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NIOSH	National Institute of Occupational Safety and Health
NMED	New Mexico Environment Department
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
RBM	Regulated Building Materials
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RRP	Renovation, Repair and Painting Program
SHPO	State Historic Preservation Officer
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service

1.0 Introduction

This Analysis of Brownfield Cleanup and Alternatives (ABCA) report has been prepared for the New Mexico Environment Department (NMED) to evaluate options for the cleanup of asbestos and lead-paint contamination at the East Pecos School Buildings located at 66 County Road B51A, Pecos, San Miguel County, New Mexico 87552 (herein referred to as “Site”). The cleanup will be funded by the NMED Brownfields Program through U.S. Environmental Protection Agency agreement 4W-02F2480, also known as the NMED 128(a) Infrastructure Grant. The proposed cleanup will include asbestos-containing material (ACM) abatement, which may be accomplished by removal, repair, and/or encapsulation, and the removal and disposal of damaged lead-based paint (LBP) and lead-containing paint (LCP) in accordance with local, state, and federal guidelines.

This ABCA report includes the following:

- A summary of the Site background and the future use of the property;
- A description of the previous environmental investigations and their findings, including the Phase I and Phase II Environmental Site Assessments (ESAs);
- Summary of applicable laws and regulations;
- Analysis of potential remediation alternatives for cleanup of the Site including consideration of effectiveness, implementability, and cost; and
- Description of the selected alternative.

2.0 Background

2.1 Site Location and Description

The Site is located near the Village of Pecos, NM in an area known as “East Pecos.” The Village of Pecos is located approximately 25 miles southeast of Sante Fe. The Site occupies approximately one acre and is comprised of the following buildings:

- Former schoolhouse building – 5,336 square feet (sf)
- Portable classroom building – 1,736 sf
- Storage shed – 100 sf
- Water tank house – 50 sf

The schoolhouse, built around 1937, served as both a school and a senior center before becoming vacant in 2011. The property is owned by the Pecos Independent School District. Further descriptions of the subject properties and their environmental conditions can be found below in **Table 1**.

Table 1: Subject Properties Summary

Building Name	Description	Paint Summary	ACM Summary
Former schoolhouse	One-story structure. Exterior: Adobe and stucco, metal roof Interior: Plaster and Drywall walls, acoustic ceiling tile, and wood and linoleum tile flooring	LBP detected in all baseboards, all interior molding, interior door jambs, interior window system, and exterior door jambs.	ACM not detected
Portable classroom building	One-story structure. Exterior: Metal, metal roof Interior: Drywall walls, acoustic ceiling tile, and vinyl flooring	LBP not detected	ACM detected in vinyl floor tile, and cove base.

Building Name	Description	Paint Summary	ACM Summary
Storage shed	One-story structure. Exterior: Adobe and stucco, metal roof Interior: Drywall walls, wood ceiling beams, stone floor	LBP not detected	ACM not detected
Water tank house	One-story structure. Exterior: Adobe and stucco, metal roof Interior: Drywall and wood panel walls, wood panel ceiling, dirt floor	LBP detected on exterior door	ACM not detected

The area surrounding the Site is rural and primarily residential. With the exception of County Road B51A (also called Main East Pecos Road), the roads in the area are unpaved. The location of the Site is depicted in **Figure 1**.

The Site's topography is generally hilly with the topographic gradient to the general west-southwest direction. The elevation of the subject property is approximately 6,928 ft above mean sea level (msl). Neither surface water bodies nor wetlands are present on the subject property.

2.2 Previous Site Uses

The known historic and current uses of the Site, based on the review of available records, are as follows:

- Prior to 1948: Unknown use, Schoolhouse construction is believed to be around 1937
- 1960s: Used as an elementary school
- 1970 to 2000: Vacant
- 2000 to 2010: Used as a senior center and had renovations occur sometime between 2005 and 2010
- 2011 to current: Property has remained vacant, with the exception of the portable classroom building used for meetings by New Mexico East Pecos Water Association

2.3 Site Assessment Findings

The following environmental investigations have been completed for this Site and its adjacent properties:

- **Phase I ESA**
 - Weston Solutions, Inc. (Weston), August 2022. Phase I ESA, East Pecos School Building, San Miguel County, New Mexico.
- **Phase II ESA and Asbestos & Lead-Based Paint Survey**
 - Souder, Miller & Associates (SMA), February 2024. Phase II ESA, Pecos Independent School District Site, Pecos, New Mexico.

These environmental investigations are further described in the following sections.

2.3.1 Phase I ESA

The Phase I ESA Report was prepared by Weston (2022) and funded by the United States Environmental Protection Agency (USEPA) under the Region 6 Targeted Brownfields Assessment Program. The assessment found no recognized environmental condition (RECs) in connection with the Site. The report did identify the potential presence of ACM or LCP as a Business Environmental Risk.

2.3.2 Phase II ESA – ACM and LBP Survey

The NMED Brownfields Program funded a Phase II ESA including an ACM and LBP survey at the Site, which was completed by SMA. The results of the investigation were summarized in the Phase II ESA and ACM/LBP survey report which was dated February 2024. The scope of work and results of each of these investigations are summarized below in **Table 2**.

Table 2: Previous Investigations Summary

Investigation	Scope of Work	Results
Phase II ESA (Weston Solutions, 2022)	Performed an asbestos and lead paint survey to identify ACM and LBP/LCP within building materials located within the interior and exterior of the buildings.	ACMs defined by USEPA and Occupational Safety and Health Administration (OSHA) as materials containing greater than 1% asbestos were identified in the portable school building. ACMs identified include Vinyl Floor Tile (VFT) and cove base. LBP defined by USEPA as a paint containing 1.0 mg/cm ² or greater concentration of lead and LCP defined by OSHA as paint containing any detectable amount of lead, were detected in the former schoolhouse building and water tank house. LBPs identified include baseboards, all interior molding, interior door jambs, interior window system, and exterior door jambs.

The investigations listed above found that asbestos and lead were present in amounts regulated by applicable USEPA, Federal OSHA, and state and local regulations in the subject properties. The following regulations apply to the Site buildings:

- OSHA Standard 29 Code of Federal Regulations (CFR) 1910.1001 Asbestos in General Industry and 1926.1101 Asbestos in Construction
- USEPA National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR 61, Subparts A and M
- OSHA 29 CFR 1926.62 "Lead in Construction"
- USEPA Resource Conservation and Recovery Act (RCRA) 40 CFR Parts 239 through 282
- USEPA Lead Renovation, Repair and Painting Program (RRP) Rule 40 CFR Part 745
- USEPA Lead Requirements for LBP Activities in Target Housing and Child-Occupied Facilities 40 CFR Part 745 (Housing and Urban Development, HUD)
- NMED Hazardous Waste Bureau and Solid Waste Bureau

2.4 Project Goal

The LBP/LCP and ACM cleanup and containment activities to be performed under this grant are critical steps in advancing the Site cleanup for rehabilitation and re-use. On March 5, 2024, NMED Brownfields Program staff attended a Pecos ISD School Board meeting to present the results of the Phase II ESA. On March 20, 2024, the NMED and Kansas State University – Technical assistance to Brownfields (KSU TAB) met with board members from the Pecos ISD to discuss the planned cleanup and future of the Site. While the future use of the Site is still being determined, the district is exploring various possibilities, including the development of teacher housing and/or a community center, with the aim of benefiting the surrounding community.

3.0 Cleanup Goals and Objectives

3.1 Cleanup Oversight Responsibility

The primary contaminants to be addressed under this grant are asbestos and lead. The responsible regulatory entities that regulate asbestos and lead cleanup include USEPA, Federal OSHA, and NMED Hazardous Waste Bureau and Solid Waste Bureau. The project will be overseen by the NMED Voluntary Remediation & Brownfields Program. Documents prepared for this site will be submitted to the applicable agencies, and work will be performed by appropriately licensed contractors following applicable regulations and abatement design documents. NMED and its qualified environmental consultant will coordinate clearance activities with the selected contractor including visual inspections, air monitoring, and wipe sampling.

3.2 Cleanup Approaches for Asbestos

The LBP/LCP and ACM cleanup general approaches are summarized in the following **Table 3** and **Table 4**.

Table 3: General Asbestos Removal Procedures

Asbestos		
Building Material	OSHA Class and NESHAP Category	Summarized Procedures
White vinyl floor tile 12'x12" with Mastic	Class II/Cat. I Non-friable ACM	Asbestos regulated area (demarcation signs and asbestos warning tape), certified workers, critical barriers, wet removal methods, prompt disposal, pre-abatement and clearance air monitoring.
Grey cove base with mastic	Class II/Cat. I Non-friable ACM	Asbestos regulated area (demarcation signs and asbestos warning tape), certified workers, critical barriers, wet removal methods, prompt disposal, pre-abatement and clearance air monitoring.

Table 4: General Lead Paint Removal/Stabilization Procedures

Lead paint (LCP and LBP)	
Building Material	Summarized Procedures
Base boards and interior molding	<p>Removal and disposal: Prior to removal and disposal, characterization of lead for disposal by collecting a representative composite of distinct waste stream materials is needed. Waste stream TCLP analytical results with >5 ppm lead would be disposed of as hazardous waste.</p> <p>Paint stabilization (removal of damaged flaking paint and preparation for new paint): Options include manual scraping, sanding, or scrubbing of flaking paint on the base boards and moldings. Typically, these activities are performed in a localized containment to prevent dispersion of dust into the environment but may not require negative pressure. Sanding can also be performed using shrouded sanders with HEPA exhaust.</p> <p>Activities may require an exposure assessment be conducted during operations that may disturb the lead paint in such a way that the airborne exposure may reach or exceed the Action level of 30 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) or the Permissible Exposure Limit of 50 $\mu\text{g}/\text{m}^3$.</p>
Interior and exterior door jamb/casing and window systems	<p>Removal and disposal: Similar to base boards and interior molding, removal and disposal starts with collection of representative composites of distinct waste stream materials. Waste stream TCLP analytical results with >5 ppm lead would be disposed of as hazardous waste.</p> <p>Paint stabilization (removal of damaged flaking paint and preparation for new paint): Lead paint removal/stabilization may include temporary door or window removal with paint removal performed with chemicals to protect wood subsurface. Door jambs, casings and window systems may be manually scraped and sanded using localized containment to prevent dispersion of dust into the environment. Negative pressure may not be required. Sanding can also be performed using shrouded sanders with HEPA exhaust.</p> <p>Activities may require an exposure assessment be conducted during operations that may disturb the lead paint in such a way that the airborne exposure may reach or exceed the Action level of 30 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) or the Permissible Exposure Limit of 50 $\mu\text{g}/\text{m}^3$.</p>

3.3 Exposure Pathways

Exposure pathways are the different routes in which a person may come in contact with hazardous substances. Potential exposure pathways include inhalation, ingestion, dermal contact, and injection (less common). At the Site, the primary exposure paths for ACM are inhalation and dermal contact, and the primary exposure paths for LBP are inhalation and ingestion. To mitigate the risk of exposure, effective remedial strategies, such as those outlined in the cleanup alternatives, are important to implement. The following sections further describe the primary exposure pathways for ACM and LBP.

3.3.1 ACM Exposure Pathways

Asbestos is a naturally occurring mineral fiber found in rock and soil, which due to its strength and heat resistance, has been used in a variety of building construction materials including for insulation and as a fire retardant. Exposure, in particular prolonged exposure, may lead to health risks including chronic lung disease and lung cancer. The primary exposure pathways for asbestos identified on Site include inhalation and dermal contact. Inhalation occurs when airborne asbestos fibers are disturbed, such as during renovation, or with the degradation of materials. Dermal exposure occurs when a person directly contacts ACM which may be from touching contaminated surfaces or from handling ACM during maintenance (without proper personal protective equipment [PPE]).

As asbestos presence was detected within Portable Classroom Building, the primary risks of inhalation and dermal contact are limited to those who enter the Site prior to and as it undergoes remediation.

3.3.2 LBP Exposure Pathways

Lead paint was a common component in paints manufactured before 1978 in the United States, where its use was banned due to its harmful effects on human health. Lead does not decay, biodegrade, or dissipate. As a result, it can accumulate in older buildings as dust and is then easily stirred up during construction or demolition activities. Exposure to lead can have short-term and long-term health consequences. Short-term exposure may lead to headaches, abdominal pain, and muscle weakness. Long-term exposure can damage the body's organ systems. The primary pathways of exposure for lead paint on this Site are inhalation and ingestion. Lead dust can become airborne during construction or renovation activities, leading to inhalation. Additionally, lead dust can settle on surfaces and be ingested through hand-to-mouth contact, which is a common way for children, in particular, to be exposed to lead.

The primary risk of lead exposure on this Site is prior to remediation and during abatement activities, when lead-containing dust is more likely to be present.

3.4 Cleanup Standards Asbestos and Lead

The primary contaminants to be addressed (asbestos and lead) each have multiple post-abatement and cleanup standards and guidelines. During the abatement and cleanup design development, NMED and its qualified environmental consultant will identify the applicable regulatory standards for re-occupancy, and where there is not an applicable standard, NMED and its qualified environmental consultant will detail the recommended cleanup levels for this site.

3.4.1 Asbestos Abatement

An asbestos regulated work area is cleared when airborne fiber levels are at or below 0.1 fibers per cubic centimeter (f/cc) or pre-abatement levels, whichever are lower. The steps to verify abatement has been complete are as follows:

- For asbestos removal, each work area will have a visual inspection performed to verify that no ACM, dust, or debris remains. This inspection is typically performed by the abatement contractor's onsite competent person and a third-party inspection.
- Once the visual inspection is successfully completed in a work area, clearance air sampling will be performed as required by OSHA. The air samples will be collected and analyzed according to the National Institute of Occupational Safety and Health (NIOSH) Method 7400 and analyzed by properly accredited laboratories or analysts.
- Typically, each work area's clearance activities are documented on a form that is signed by inspection personnel and the owner's representative.

Clearance air sampling is not required for asbestos outdoor work and a visual inspection conducted as outlined above is performed and documented.

3.4.2 Lead Remediation and Stabilization

For LBP removal and stabilization, there are no re-occupancy standards that are directly applicable to this Site. However, the use of the USEPA's Lead RRP clearance standards or USEPA HUD lead abatement wipe standards may be used. Wipe standards look at specific building components such as floors, walls, and windowsills and compare the post-remediation or clean-up wipe levels from surfaces for total lead to the established HUD standards for child-occupied buildings. NMED and its qualified environmental consultant will identify the appropriate wipe sampling for re-occupancy or further construction activities, based on future plans for the building (once determined).

A report documenting the abatement will be submitted to NMED summarizing the work with field notes, photos, and other relevant documentation.

3.5 Laws & Regulations Applicable to Cleanup

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, state environmental and cultural properties law, and local regulations. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. All appropriate permits (e.g., notification of

intent to remove ACM) will be obtained prior to the work commencing. Additional laws and regulations are discussed in more detail below.

OSHA Lead in Construction 29 CFR 1926.62

Due to the presence of lead in the coatings at the Site, employers who will be impacting the LCP where their employees may be occupationally exposed to lead, must follow the OSHA Lead in Construction Code 29 CFR 1926.62. This code requires specified training, engineering controls, and administrative controls for employees impacting lead as part of construction activities.

OSHA Asbestos 29 CFR 1926.1101

The asbestos standard for the construction industry (29 CFR Part 1926.1101) regulates asbestos exposure for the following activities:

- demolishing or salvaging structures where asbestos is present;
- removing or encapsulating ACM;
- constructing, altering, repairing, maintaining, or renovating asbestos-containing structures or substrates;
- installing asbestos-containing products;
- cleaning up asbestos spills/emergencies; and
- transporting, disposing, storing, containing, and housekeeping involving asbestos or asbestos-containing products on a construction site.

EPA NESHAP 40CFR Part 61, Subpart M

Air toxics regulations under the Clean Air Act specify work practices for asbestos to be followed during demolitions and renovations of all facilities, including, but not limited to, structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). The regulations require a thorough inspection where the demolition or renovation operation will occur.

The regulations require the owner or the operator of the renovation or demolition operation to notify the appropriate delegated entity (often a state agency) before any demolition, or before any renovations of buildings that contain a certain threshold amount of regulated ACM. The rule requires work practice standards that control asbestos emissions. Work practices often involve removing all ACM, adequately wetting all regulated ACM, sealing the material in leak tight containers, and disposing of the asbestos-containing waste material as expediently as practicable, as the regulation explains in greater detail.

EPA AHERA 40CFR Part 763, Appendix C

The Model Accreditation Plan (MAP) in the Asbestos Hazard Emergency Response Act (AHERA) code requires the use of certified and accredited personnel for the inspection, abatement design, and workers and supervisors/contractors performing asbestos abatement work for commercial and public buildings.

- NMED administers the federal asbestos air quality NESHAP standard including abatement and demolition notifications.
- New Mexico Solid Waste Bureau regulates the transportation and disposal of asbestos waste.
- New Mexico OSHA administers the federal OSHA regulations for asbestos worker protection.

4.0 Alternatives Considered

4.1 Cleanup Alternatives Considered

The proposed cleanup will include abatement of ACM, which may be accomplished by removal, repair, and/or encapsulation, and LBP/LCP paint stabilization, including removal of flaky, peeling paint, stabilization of paint using encapsulation, and/or removal.

Additional actions may include the preparation of an Asbestos and Lead Management Plan (Management Plan) for the Site including requirements for periodic surveillance, operation and maintenance procedures, and hazard communication plans. Since portions of the ACM and LBP/LCP may remain in place, the Management Plan will describe the procedures and requirements for work that may impact the remaining materials.

A preliminary evaluation of remedial alternatives was performed. Alternatives that were determined to have low effectiveness, low implementability, or prohibitive costs were not evaluated further. The following alternatives warranted further consideration and have been evaluated in subsequent sections:

Alternative #1: No Action

Alternative #2: Removal of all ACM and LBP/LCP

Alternative #3: Repair and Encapsulation of ACM and LBP/LCP and establishment of a written Management Plan

4.2 Cleanup Alternative Evaluation

Cleanup approaches proposed to address the ACM and LBP/LCP were evaluated using the following established criteria:

- Effectiveness - Protection of human health and the environment, proven long- and short-term effectiveness of the remedy, regulatory compliance, reduction in toxicity/mobility/volume.
- Implementability – Probability of success, feasibility and schedule.
- Cost.

The evaluation of the three alternatives is summarized below.

4.2.1 Alternative #1 - No Action

Alternative #1 No Action would leave the asbestos and lead in their current state and would restrict the Site to authorized users through signage and other controls.

Effectiveness: Alternative #1 is not considered effective. No Action would leave the Site in its current state and would not address damaged ACM and LBP/LCP. Areas of the Site would need to be restricted to authorized personnel wearing PPE (e.g., respirators), and the Site would not meet the requirements under USEPA AHERA 40 CFR 763 and OSHA Asbestos or Lead regulations for General Industry. Additionally, exterior damaged contaminated materials could be released to the environment and pose possible public exposure. Given the East Pecos community's desire for a beneficial use of this site, Alternative #1 would not allow community members to safely access the Site without PPE nor does it alleviate the risks associated with potential exposure of exterior materials to the surrounding community.

Implementation: The ease of implementing Alternative #1 is simple/effortless. Actions include securing areas with friable ACM and damaged LBP/LCP and posting access restriction signs.

Cost: The costs to implement Alternative #1 would be minimal.

4.2.2 Alternative #2 - Removal of all ACM and LCP

Alternative #2 would include full removal of asbestos and lead, including destructive activities to access ACM and LBP/LCP within door jambs and exterior window systems. This alternative would require the complete removal of painted interior and exterior finish components (e.g., windows, trim, fascia, plaster) to remove all materials containing asbestos and lead.

Effectiveness: The effectiveness of Alternative #2 is high. Complete removal of ACM and LBP/LCP would remove the potential for exposure to these hazardous materials to the community, building occupants, contractors, and visitors and be protective of human health and the environment. Alternative #2 would also allow for rehabilitation and construction work to proceed to meet the needs of future building occupants. Alternative #2 paves the way for a community-beneficial transformation of the Site that prioritizes both human health and environmental well-being by removal of ACM and LBP risk.

Implementation: The ease of implementing Alternative #2 is moderate. Demolition and removal work would be performed by qualified abatement firm(s) with certified personnel. All interior demolition and removal work would require the establishment of regulated work areas with daily air monitoring and inspections by qualified personnel. Following the completion of interior activities, air and wipe samples are required to confirm full removal. The removal of exterior LBP/LCP would require establishment of exterior containment(s) to prevent the dispersion of the contaminants to the surrounding environment including air, soil, and water. Community air monitoring is recommended during removal of exterior ACM and LCP. Alternative #2 would also require the replacement of demolished materials.

Cost: The estimated rough order of magnitude costs of Alternative #2 would be approximately \$37,950.

4.2.3 Alternative #3 - Repair and Encapsulation of ACM and LBP/LCP

Alternative #3 would include cleanup of damaged ACM and associated debris (e.g., floor tiles) and installation new flooring over the top. Loose and flakey paint would be removed to stabilize the surface and the remaining paint would be encapsulated to reduce potential exposure of future occupants.

Effectiveness: The effectiveness of Alternative #3 is moderate. Alternative #3 would remove accessible ACM and damaged LBP/LCP; repair remaining ACM and LBP/LCP; encapsulate remaining ACM and LBP/LCP; and establish procedures to maintain the remaining ACM and LBP/LCP in a manner that protects human health and the environment. The USEPA has established regulations and guidance for this approach to abating and managing ACM and LCP in schools, child-occupied housing, and public and commercial buildings. Alternative #3 may restrict the community's goal of beneficial reuse of the Site, because renovation, maintenance and management of the remaining contaminated would add costs and may limit options.

Additional actions that may be implemented include the development of a written Management Plan for the Site that would document the updated ACM and LBP/LCP surveys identifying the remaining materials in the buildings, regular visual inspections of the ACM and LCP to evaluate the current condition, procedures for repairing damaged ACM or LCP if observed, and procedures for future construction or maintenance activities that may impact these materials.

Implementation: The ease of implementing Alternative #3 is moderate. There will be ACM remaining below the new flooring, but building occupants would be protected from exposure during normal operations. For the LBP/LCP, the remediation focuses on damaged LBP/LCP where the paint would be stabilized by removing loose, flaking, and damaged paint allowing for the surface preparation and repainting. The selection of paint would include paint that would encapsulate the remaining surfaces. During the surface preparation and repainting, the OSHA Lead in Construction code and USEPA disposal requirements would apply. Some lead hazardous waste would be generated and be managed in accordance with applicable regulations.

Remaining ACM and LBP/LCP would be managed under a written Management Plan for the site that includes periodic surveillance, communication of hazards, procedures not to disturb the materials, and procedures if the materials are disturbed or planned to be disturbed.

Cost: The estimated rough order of magnitude costs to implement removal, repair, and encapsulation of ACM and LCP is \$20,000 with an anticipated management per the Management Plan requiring annual costs of \$2,500 per year. Building renovations and other material disturbances would require specialized procedures; expenses for these activities are not included in these estimated costs.

5.0 Selected Alternative and Proposed Cleanup Plan



The recommended cleanup alternatives for the Pecos Independent Schools District Site is **Alternative #2 – Removal of all ACM and LCP**.

Alternative #1 No Action cannot be recommended since it does not address site risks to human health and the environment and does not allow safe access for community members to use the Site in the future. Both Alternative #2 and Alternative #3 are effective at reducing potential exposures to Site occupants and the environment to ACM and LBP/LCP; however, Alternative #2 fully removes ACM and LCP, which is the most effective approach for eliminating the risk of exposure to these hazardous substances and for offering the most flexibility in the Site reuse. Whereas, Alternative #3 may restrict the community's options for beneficial reuse of the Site and is likely to have higher costs for future renovation, maintenance and management due to the remaining contaminated materials. While the future use of the Site is still being determined, the district is exploring various possibilities, including the development of teacher housing and/or a community center, with the aim of benefiting the surrounding community. Alternative #2 will ensure that future occupants, including children, will not be exposed to ACM or LBP/LCP.

The ease of implementation for both Alternative #2 and Alternative #3 is considered moderate, with similarly complex procedures for abatement; however, Alternative #2 is preferable because it does not require additional ACM and LCP management via a Management Plan. The estimated remediation cost of Alternate #2 (\$37,950) is higher than Alternate #3 (\$20,000); however, the overall cost of Alternate #3 would exceed Alternate #2 after about seven years of maintenance.

Figure 1 – Site Map



<p>Legend</p> <p> SITE BOUNDARY</p> <p>0 50 100 200 300 400 Feet</p> <p>Service Layer Credits: Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community Source: Esri, Maxar, Earthstar Geographics, and the GIS</p>	<p> AECOM</p> <p>FIGURE 1-2 SUBJECT PROPERTY AND SURROUNDING AREAS FORMER PECOS SCHOOL BUILDING 66 COUNTY ROAD B51A PECOS, SAN MIGUEL COUNTY NEW MEXICO, 87552</p> <table border="1"><tr><td>Date: AUGUST 2024</td><td>Project Number: 60732662</td><td>SCALE: AS SHOWN</td></tr></table>	Date: AUGUST 2024	Project Number: 60732662	SCALE: AS SHOWN
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