

**Tribbett, Katherine (Kate)**

3:32 PM

**From:** connie@chkinglaw.com  
**Sent:** Thursday, February 17, 2022 3:32 PM  
**To:** R8 Hearing Clerk  
**Cc:** Rae, Sarah; Baum, Christina (she/her/hers); 'Dan Brown'; 'Brandice Eslinger'  
**Subject:** Brown - Response to 02-03-22 letter from EPA - Colorado Smelter Superfund Site, Pueblo, Colorado, Superfund Lien - Email 1 of 3  
**Attachments:** Attachment 6 - 05-05-06 District Court, El Paso County, CO, Case No. 06PR440, Letters Testamentary for Estate of BABrown.pdf; Attachment 7 - 02-11-22 SGaines to CBrown Ltr re Pueblo Real Estate.pdf; Attachment 8 - SGaines, Bryan Cave Leighton Paisner LLP webpage.pdf; Attachment 9 - 1983 Aerial Photo Map of Property.pdf; Attachment 12 - Timeline for the Brown property - OU2 site.pdf  
**Categories:** Purple Category

Received by  
EPA Region VIII  
Hearing Clerk

Dear Ms. Stephanie Talbert,

On behalf of Cecil H. Brown, I am submitting three emails with Attachments #6 - #12 in response to the February 3, 2022 letter from EPA regarding the Colorado Smelter Superfund Site, Pueblo, Colorado, Superfund Lien – EPA Response to Written Objection – In the matter of 1045-1049, 1103 South Santa Fe Avenue, City of Pueblo, Colorado; Docket No.: CERCLA-08-2022-0003 (February 3<sup>rd</sup> letter from EPA). EPA had prepared the February 3<sup>rd</sup> letter in response to my December 22, 2021 email to Sarah Rae, Senior Assistant Regional Counsel, EPA Region 8, regarding Response to 12/02/21 letter from EPA – Colorado Smelter Superfund Site – Object to perfection of liens and request (December 22<sup>nd</sup> email to EPA).

This is the first of the three emails.

We continue to believe the EPA does not have a statutory basis to perfect the liens pursuant to Section 107(l) of CERCLA. This response presents additional information that contradicts the EPA's right to assert or perfect the liens.

### **Transfer of Property to LLCs Did Not Require an Environmental Review**

First, I would like to revise this statement previously made in the December 22<sup>nd</sup> email to EPA:

These are the dates that Cecil H. Brown **and Beverly Ann Brown** purchased the property:

- On August 31, 1982 Cecil H. Brown **and Beverly Ann Brown** purchased the property located at 1045-1049 South Santa Fe Avenue (4 acres).
- On August 20, 1986 Cecil H. Brown **and Beverly Ann Brown** purchased the property located at 1103 South Santa Fe Avenue (8 acres)." (bolded revisions added)

Beverly Ann Brown died on December 8, 2005.

Attachment #6: 05-05-06 District Court, El Paso County, CO, Case No. 06PR440, Letters Testamentary for Estate of BABrown.pdf

In the February 3<sup>rd</sup> letter from EPA, on page 5, EPA claimed the transfer of property ownership to the LLCs in 2011 and 2012 triggered the need for the LLCs to comply with the EPA's All Appropriate Inquiries Final Rule (AAI Rule) which went into effect on November 1, 2006.

Steve Gaines, Counsel, Bryan Cave Leighton Paisner LLP, has provided a letter in which he summarizes the history behind the formation of the LLCs to hold the real property in Pueblo, Colorado that was initially acquired in the 1980's by Cecil Brown and his wife Beverly in joint ownership. In his letter to Cecil Brown, Steve Gaines stated "Obviously, you remained at least a 50% beneficial owner in all of this property and the primary

manager of the property throughout this full period of ownership. Accordingly, there was never any transfer of the property for consideration that would have justified any sort of environmental review of the property.”

Attachment #7: 02-11-22 SGaines to CBrown Ltr re Pueblo Real Estate.pdf

Attachment #8: SGaines, Bryan Cave Leighton Paisner LLP webpage.pdf

Cecil Brown’s environmental consultant, Brandice Eslinger, President, All-Phase Environmental Consultants, Inc. (APEC), has stated the instances shown below are those that typically trigger an environmental review/site assessment:

-A sale/purchase that requires financing and the loan institution requires it.

-Refinancing of a property – again, the loan institution requires it.

-Using a property as collateral to purchase other properties.

-SBA secured loans.

-USDA secured loans.

-HUD secured loans.

-A 1031 exchange.

-Buying a “high risk” property but paying cash outright (typically the investor is aware of or has some knowledge of pre-existing environmental conditions; no financing is used).

-Commercial real estate sale/purchase – this became more “common practice” after the November 1, 2006 effective date of EPA’s AAI Rule.

The transfer of property to LLCs would not trigger an environmental review/site assessment.

### **Cecil Brown Is Not Liable Due to the Innocent Landowner Defense Because He Conducted All Appropriate Inquiries in 1982 and 1986**

In the February 3<sup>rd</sup> letter from EPA, on page 5, EPA claimed “Mr. Brown has provided no information to support his contention that he complied with the AAI standard in effect in 1982 and 1986.”

As previously stated in the December 22<sup>nd</sup> email to EPA: “There were no standards for “all appropriate inquiries” available in 1982 and 1986.”

Therefore, there was no AAI standard in effect in 1982 and 1986.

As previously stated in the December 22<sup>nd</sup> email to EPA:

“Prior to purchasing the property on August 31, 1982 and on August 20, 1986, Cecil H. Brown undertook all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial or customary practice in an effort to minimize liability. The tenants at the time did not express any concerns. The potential for contamination at the Colorado Smelter Site had not yet been discovered. (As previously described, the potential for contamination was discovered in 1989.) CDPHE had not yet conducted a preliminary assessment of the area. (As previously described, CDPHE conducted a preliminary assessment of the area in 1991.) CDPHE had not yet collected and analyzed soil samples from the sites of Pueblo’s historic smelter activity. (As previously described, in 1994, samples of soil were first collected from the sites of Pueblo’s historic smelter activity, including the Colorado Smelter.)

On August 31, 1982 and on August 20, 1986, when Cecil H. Brown purchased the property, he did not know and had no reason to know that any hazardous substance was disposed of on, in, or at the property.”

When Cecil Brown purchased the property in 1982, he had been a tenant on the property since 1963, first as the District Manager of SoCo for Ryder Truck Rental, and then as owner of Alpine Truck Rental.

In 1963, both the Ryder Truck Rental building and the Meadow Gold Dairy building were new facilities, just built by the previous owner and without environmental concerns.

From 1963 to 1982 (nineteen years) Cecil Brown managed both Ryder Truck Rental and Alpine Truck Rental, and worked with the owner of the property, He became well acquainted with the owners and tenants of other nearby properties. By 1982, the smelter had been shut down for more than 70+ years and a lumberyard and church had occupied the smelter site for more than 50 years. There were no slag piles located on the property in 1982. An aerial photo map taken in 1983 illustrates the clean, well-maintained appearance of the property.

Attachment #9: 1983 Aerial Photo Map of Property.pdf

There were slag piles located on other nearby properties in 1982. No one expressed concerns about the property or the slag piles located on other nearby properties. Specifically, the owner of the property, the employees of Ryder Truck Rental and Alpine Truck Rental, the other tenants on the property and the owners and tenants of other nearby properties did not express concerns about the property or the slag piles located on other nearby properties.

From 1963 to 1971 (for eight years), while Cecil Brown was working on the property, he saw the nearby Catholic school (i.e., the St. Mary's School) in session, with a playground for the students. The July 2014 report entitled "Potica, Pints, and Prayers in Old Bojon Town" prepared by Historitecture, L.L.C. for the City of Pueblo, Colorado, provides the following information regarding the history of the St. Mary's School:

-Page 11, "With an eye towards economy, Father Zupan planned to reuse the bricks from the defunct Eilers Smelter to construct the new St. Mary's School. On Sunday, July 15, 1923, the parish held a large picnic fundraiser to finance the cost of demolishing the 225-foot smokestack."

-Page 12, "Prior to construction of the school, each St. Mary's family was asked to clean at least 100 bricks. Many families created their own tools for the task, and the children were paid a penny for each brick they cleaned. ... The community effort proved surprisingly efficient and groundbreaking for the school took place in late summer 1923. ... When it opened for the 1923 school year, the new building was able to accommodate 500 students but had an enrollment of just 229 students, with 250 students still attending classes at the St. Mary's School in the Grove."

-Page 14, "St. Mary's School closed in 1971 after financial challenges forced Bishop Charles Buswell to shutter all Pueblo Catholic schools."

[http://www.historitecture.com/pdf/bojon\\_town\\_context.pdf](http://www.historitecture.com/pdf/bojon_town_context.pdf)

The St. Mary's School was closed in 1971 due to financial problems the Catholic church was experiencing.

Prior to 1982, Cecil Brown's largest customer, Meadow Gold Dairies, was also a tenant on the property and continued to be a tenant after his purchase of the property. Cecil Brown's purchase of the property in 1982 was done via an option that Meadow Gold Dairies had to purchase the 4-acre parcel and Meadow Gold Dairies passed that option to Cecil Brown. Cecil Brown was aware of the smelter, just like everyone was, but there was not an awareness of potential contamination. Simply seeing slag piles did not automatically trigger concern regarding hazardous substances as Roger J. Sams, P.E., pointed out in his December 16, 2021 letter (Attachment #2: 12-16-21 RSams to CBrown Ltr re South Santa Fe Ave Pueblo CO Property.pdf, December 22<sup>nd</sup> email to EPA.)

Slag from the Colorado Smelter was being used for a number of different purposes. This was not peculiar to Pueblo:

-The December 9, 1998 Stanford University News Release entitled "Some smelter slags represent a significant environmental hazard" stated: "Because it has been considered chemically inert, slag has been mixed with cement and used to construct roadways and railroad beds. It has been used for sand blasting. It has been added to roofing shingles. And it has even been used to sand roads in the winter."

<https://news.stanford.edu/pr/98/981209slag.html>

-In 2013, an Iowa county was still using slag for roads as justified by studies indicating it was safe.

<https://www.desmoinesregister.com/story/news/2019/01/08/iowa-steel-slag-dust-gravel-roads-children-health-risk-muscatine-county-ssab-americas/2475282002/>

-In 2019, bags of slag from the Anaconda Co. Smelter Superfund site in Montana were being sold as souvenirs.

<https://abcnews.go.com/US/wireStory/regulators-stop-sale-montana-mine-waste-bag-oslag-67110168>

The EPA website for the Superfund Site: Colorado Smelter, Pueblo, CO, Cleanup Activities states: "The Colorado Smelter was a **silver and lead smelter** that operated in the Eilers and Bessemer neighborhoods from 1883 to 1908. EPA listed the site on the National Priorities List in December 2014 ..." (bolded emphasis added) (Attachment #1: 12-16-21 EPA website – Superfund Site – Colorado Smelter Pueblo, CO Cleanup Activities – Background.pdf, December 22<sup>nd</sup> mail to EPA.)

An article entitled "Characteristics and environmental aspects of slag: A review" in the June 2015 Applied Geochemistry journal, provides the following information:

-Page 238, "Ferrous slags are created during the recovery of Fe (iron) from natural ores or recycled materials to produce either Fe or steel."

-Page 239: Non-ferrous slags discussed in this chapter are produced during the recovery of non-ferrous metals from natural ores. ... In general, three critical steps are involved in processing Cu, Ni, and Pb (copper, nickel and lead) sulfide ores: concentrating, roasting and smelting. ... Slag is produced during smelting, converting, and some possible additional refining steps." (meanings of symbols for chemical elements added)

-Pages 260 – 261: "This chapter reviewed over 150 published studies on slag. Because of variable melt compositions and furnace conditions, slags have a range in bulk chemistry, mineralogy, chemical composition of phases, and leachate chemistry. Summarizing these characterizations by slag type from a variety of locations allowed us to make generalizations that are useful when considering the environmental aspects of slag. For instance, ferrous slag commonly has acid-neutralizing capacity and does not readily release environmentally significant amounts of most trace elements making it an attractive resource for construction purposes and in treating acid-mine drainage, among other uses. In contrast, non-ferrous slag may generate acid and release slag-type-specific trace elements when weathered and therefore more commonly dumped in waste piles, but also has the potential to be reprocessed for secondary metal recovery. As the global population grows and technology advances, it is likely that slag will continue to be a valuable resource for reuse and recycling and a source of contamination: understanding its nature will only become increasingly more important."

Piatak, N.M., Parsons, M.G., Seal II, R.R. 2015. Characteristics and environmental aspects of slag: A review. *Applied Geochemistry* 57, 236-266.

The symbol for chemical element silver is Ag. According to this article, on pages 264 and 265, the earliest published characterization studies on slag from silver (Ag) and lead (Pb) smelters were:

-Manz, M., Castro, L.J., 1997. The environmental hazard caused by smelter slags from the Sta. Maria de la Paz mining district in Mexico: *Environmental Pollution* 98, 7-13.

-Ettler, V., Cervinka, R., Johan, Z. 2009a. Mineralogy of medieval slag from lead and silver smelting (Bohutin, Pfibram District, Czech Republic): towards estimates of historical smelting conditions. *Archaeometry* 51, 987-1007.

Attachment #10: June 2015 - *Applied Geochemistry* 57 - Characteristics and environmental aspects of slag - A review

Therefore, from 1982 to 1986, when Cecil Brown purchased the property, it does not appear that there were any published characterization studies on slag from silver and lead smelters. The 1997 and 2009 publications (cited above) occurred after Cecil Brown purchased the property in 1982 and 1986, and before the EPA listed the Colorado Smelter site on the National Priorities List in December 2014.

This information is supportive of the statement previously made in the December 22<sup>nd</sup> email to EPA: "At the time Cecil H. Brown bought the property no one was concerned about the potential for contamination at the Colorado Smelter Superfund Site."

### **Pueblo City Councilwoman Requested Guarantee that Business or Homeowners Not Have to Pay Cost**

The June 11, 2012 EPA Region 8 Regional Administrator's letter to Colorado Governor John Hickenlooper stated that EPA is considering proposing the Colorado Smelter site in Pueblo, Colorado to the Superfund National Priorities List (NPL), EPA is seeking the concurrence of the State of Colorado on adding the Colorado Smelter site to the NPL, and EPA is requesting a written response to this letter.

<https://semspub.epa.gov/work/08/1570678.pdf>

According to the December 30, 2013 Pueblo Chieftain article entitled "Residents want EPA to work quickly": "If City Council and the Pueblo County commissioners are going to ask that the Eilers neighborhood be part of a federal Superfund cleanup program, neighborhood residents want assurances it will be done as fast as possible, done thoroughly and at no cost to themselves. Those goals have been added to a draft letter addressed to Gov. John Hickenlooper -- the letter that federal Environmental Protection Agency officials have been urging city officials to write for more than 18 months. The Superfund process requires that Hickenlooper request the Eilers neighborhood be added to federal cleanup program. Council and the commissioners informally agreed earlier this month to request the listing. The Superfund listing is intended to clean up lead and arsenic contamination that's been found in the soil of houses and businesses in the South Side

neighborhood. **Commission Chairman Terry Hart said a final draft of the letter -- including some of the additions requested by Eilers residents -- is being circulated among city and county officials and should be sent to governor's office in the next few days. The draft offered by Councilwoman Sandy Daff, whose District 4 includes Eilers, includes a list of requests from the neighborhood, including: A guarantee that business or homeowners will not have to pay the cost of removing contaminated soil from their property or restoring it. EPA officials have said the purpose of the Superfund program is to clean up contaminated areas at either government expense or by the responsible polluter.** (bolded emphasis added)

<https://www.chieftain.com/story/lifestyle/health-fitness/2013/12/30/residents-want-epa-to-work/9167496007/>

According to the January 3, 2014 Denver Post editorial entitled "Seek Superfund status for Pueblo smelter": Pueblo City Council and Pueblo County Commissioners on December 31, 2013 sent a letter to Colorado Governor Hickenlooper asking him to send a letter to the EPA in support of listing the old Colorado Smelter site on the EPA's NPL.

<https://www.denverpost.com/2014/01/03/seek-superfund-status-for-pueblo-smelter/>;

On December 11, 2014 EPA listed the Colorado Smelter site on the NPL.

[https://archive.epa.gov/epapages/newsroom\\_archive/newsreleases/f570ef55608b921385257dab005771a9.html](https://archive.epa.gov/epapages/newsroom_archive/newsreleases/f570ef55608b921385257dab005771a9.html)

### **All-Phase Environmental Consultants, Inc. Soil Confirmation Investigation**

EPA has not proven that soil contamination is present at a level that would require remediation on the entire 12 acres of the property.

For Cecil Brown, All-Phase Environmental Consultants, Inc. (APEC) performed a soil confirmation investigation. APEC sample analytical results indicate there are elevated levels of lead and arsenic in some limited areas along the northern boundary of the property.

On December 22, 2021, APEC personnel collected soil samples at the four sampling sites on the property (labeled by EPA in March 2020 as DU-0031, DU-0032, DU-0033, and DU-0035) for which EPA's sample analytical results were the highest for arsenic and lead. APEC had the soil samples they collected analyzed for arsenic and lead using the Metals - Inductively Coupled Plasma (ICP) test and the Toxicity Characteristic Leaching Procedure (TCLP) test. APEC's findings include:

-APEC sample results indicate there are elevated levels of lead and arsenic in soils, specifically along the northern property boundary (DU-0032, DU-0033, DU-0035) when compared to current EPA RSLs for Lead and TCLP Lead, and the OU1 Site Specific Residential Soil Value for Arsenic, that has been established for the Colorado Smelter Superfund Site. It should be noted that the Property is not zoned, nor is it utilized, as residential. It is an industrial zoned property, specifically, I-2. Therefore, until a site-specific value is determined for the property and the specific zoning/use type, it is speculative to indicate whether or not arsenic, specifically, is above RSLs.

-All arsenic samples were below the TCLP threshold of 5 mg/kg.

-The lead is elevated in all samples with the exception of DU-0031 (APEC Sample) and DU-0033 (APEC Sample).

-The only TCLP Lead exceedance was in sample DU-0032, at 25.2 mg/kg.

-Further investigation may be warranted in this area and/or remedial efforts may be necessary dependent upon site specific arsenic RSLs that have yet to be established. Delineation of the TCLP results will better define what area specifically needs to be "capped" by an impervious surface, however with the vast amount of EPA data, coupled with the APEC results, initial opinions are that DU-0032 (area 32) may be the highest/only priority. Furthermore, the remaining parcels, as a remedial solution, could operate under a Materials Management Plan and potentially "use restrictions" to ensure that human health is protected during any potential work on site, specifically underground digging (utility work, etc.) and from future development, other than industrial.

Attachment #11: 02-14-22 APEC Soil Confirmation Investigation, Brown Property, Pueblo, CO 81006

The "Timeline for the Brown property – OU2 site" lists, in chronological order, the dates and information presented in the December 22<sup>nd</sup> email to EPA and this February 17<sup>th</sup> email to EPA.

Attachment #12: Timeline for the Brown property – OU2 site.pdf

Please don't hesitate to contact me if you have any questions or comments. Thanks very much for your consideration.

Connie

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Colorado Springs, CO 80915  
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## **Tribbett, Katherine (Kate)**

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**From:** connie@chkinglaw.com  
**Sent:** Thursday, February 17, 2022 3:32 PM  
**To:** R8 Hearing Clerk  
**Cc:** Rae, Sarah; Baum, Christina (she/her/hers); 'Dan Brown'; 'Brandice Eslinger'  
**Subject:** Brown - Response to 02-03-22 letter from EPA - Colorado Smelter Superfund Site, Pueblo, Colorado, Superfund Lien - Email 2 of 3  
**Attachments:** Attachment 10 - June 2015 Applied Geochemistry 57 - Characteristics and environmental aspects of slag - A review.pdf  
**Categories:** Purple Category

Dear Ms. Stephanie Talbert,

On behalf of Cecil H. Brown, I am submitting three emails with Attachments #6 - #12 in response to the February 3, 2022 letter from EPA regarding the Colorado Smelter Superfund Site, Pueblo, Colorado, Superfund Lien – EPA Response to Written Objection – In the matter of 1045-1049, 1103 South Santa Fe Avenue, City of Pueblo, Colorado; Docket No.: CERCLA-08-2022-0003 (February 3<sup>rd</sup> letter from EPA). EPA had prepared the February 3<sup>rd</sup> letter in response to my December 22, 2021 email to Sarah Rae, Senior Assistant Regional Counsel, EPA Region 8, regarding Response to 12/02/21 letter from EPA – Colorado Smelter Superfund Site – Object to perfection of liens and request (December 22<sup>nd</sup> email to EPA).

This is the second of the three emails.

Connie

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## **Tribbett, Katherine (Kate)**

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**Subject:** Brown - Response to 02-03-22 letter from EPA - Colorado Smelter Superfund Site, Pueblo, Colorado, Superfund Lien - Email 3 of 3  
**Attachments:** Attachment 11 - 02-14-22 APEC Soil Confirmation Investigation, Brown Property, Pueblo, CO 81006.pdf  
**Categories:** Purple Category

Dear Ms. Stephanie Talbert,

On behalf of Cecil H. Brown, I am submitting three emails with Attachments #6 - #12 in response to the February 3, 2022 letter from EPA regarding the Colorado Smelter Superfund Site, Pueblo, Colorado, Superfund Lien – EPA Response to Written Objection – In the matter of 1045-1049, 1103 South Santa Fe Avenue, City of Pueblo, Colorado; Docket No.: CERCLA-08-2022-0003 (February 3<sup>rd</sup> letter from EPA). EPA had prepared the February 3<sup>rd</sup> letter in response to my December 22, 2021 email to Sarah Rae, Senior Assistant Regional Counsel, EPA Region 8, regarding Response to 12/02/21 letter from EPA – Colorado Smelter Superfund Site – Object to perfection of liens and request (December 22<sup>nd</sup> email to EPA).

This is the third of the three emails.

Connie

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DISTRICT COURT  
EL PASO COUNTY, COLORADO  
Court Address: 105 E. Vermijo, Room 120  
Colorado Springs, CO 80903

MAY 5 2006

M.V. PERRY  
CLERK OF COURT

IN THE MATTER OF  THE ESTATE OF:

Beverly Ann Brown, also known as Beverly A. Brown  
and Ann Brown,

Deceased.

▲ COURT USE ONLY ▲

Case Number:  
06PR 440

Division: Courtroom:

LETTERS

(Name) David E. Brown was appointed or qualified by this Court or its Registrar on MAY 5 2006 (date) as:

- Personal Representative. The decedent died on December 8, 2005 (date).
  - These are Letters of Administration. (The decedent did not leave a will.)
  - These are Letters Testamentary. (The decedent left a will.)
- Special Administrator in  an informal  a formal proceeding. These are Letters of Special Administration.
- Conservator. These are Letters of Conservatorship.
  - The protected person is a minor whose date of birth is \_\_\_\_\_
  - Special Conservator.
- Guardian. These are Letters of Guardianship for:
  - an incapacitated person.  a minor whose date of birth is \_\_\_\_\_
  - Emergency Guardian  
(Expires on \_\_\_\_\_ (date), not more than 60 days after appointment per §15-14-312, C.R.S.)  
Appointment or qualification is by  court order.  will.  written instrument.
- \_\_\_\_\_

These Letters evidence full authority, except for the following limitations or restrictions, if any: NONE

Dated: MAY 5 2006

René T. Cartier  
Assistant Registrar  
(Deputy) Clerk or Registrar of Court

Certification Stamp

CERTIFICATION

or Certified to be a true copy of the original in my custody and to be in full force and effect as of:

Dated: MAY 5 2006

René T. Cartier  
(Deputy) Clerk of Court

February 11, 2022

Cecil Brown  
2029 North Cascade Avenue  
Colorado Springs CO 80907

**Re: Pueblo Real Estate**

Dear Cecil:

I am responding to your request that I summarize some of the history behind the formation of LLCs to hold the real property in Pueblo, Colorado that was initially acquired in the 1980's by you and your wife Beverly in joint ownership.

As a result of the death of Beverly in 2005, we anticipated that the ownership of the real property may need to be transferred multiple times and may need to be held in joint ownership; for example, between you and the family trust formed under Beverly's will. In order to facilitate multiple potential transfers and joint ownership without the necessity of several real estate deeds that would need to be recorded, and in order to clarify joint ownership rights, we recommended that the real estate be held in one or more limited liability companies. Ultimately, we determined to transfer the ownership interest in the real property held by Beverly's estate first to the family trust, and then from the family trust to you. The use of the limited liability company reduced the necessity of two recorded deeds to one recorded deed – from the estate to the limited liability company. Further, the use of the limited liability company will facilitate future real estate transfers that may occur as a result of your death.

Obviously, you remained at least a 50% beneficial owner in all of this property and the primary manager of the property throughout this full period of ownership. Accordingly, there was never any transfer of the property for consideration that would have justified any sort of environmental review of the property.

Let me know if you need any further information on these issues.

Very truly yours,



**Steve Gaines**

SG:jrc



# Stephen L. Gaines

Counsel Colorado Springs

**T:** +1 719 381 8443

**E:** [steve.gaines@bcplaw.com](mailto:steve.gaines@bcplaw.com)

Steve Gaines combines more than 30 years of legal insight with experience as a certified public accountant and an MBA in finance to resolve his clients legal issues pragmatically. He has helped all manner of companies including for-profit, nonprofit, government and healthcare organizations with a broad range of general business and tax matters. Mr. Gaines relies on his substantial multidisciplinary experience in corporate and general business law, estate planning and probate, charitable giving, income

## **Practices**

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Tax Advice & Controversy

Tax & Private Client

Corporate

Higher Education Team

Health Care Team

Real Estate

Real Estate Tax

Non Profit Organizations

Religious Organizations

tax planning, nonprofit law and taxation and school law to provide well-rounded, comprehensive solutions to address his clients legal needs.

## **Civic Involvement & Honors**

- Garden of the Gods Rotary
- American Heart Association
- Colorado Springs Fine Arts Center

## **Professional Affiliations**

- Colorado Bar Association
- El Paso County Bar Association

## **Admissions**

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Colorado, 1979

## **Education**

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University of Colorado-Colorado Springs, M.B.A., 1991

University of Michigan, J.D., Order of the Coif, 1979

University of Illinois, B.S., 1975

one inch



Year: 1983  
Source: USGS  
Scale: 1" = 500'  
Comment: Best Copy Available

Address: 1045 & 1103 S Santa Fe Ave, Pueblo, CO  
Approx Center: -104.6083562,38.24794246

Order No: 22021000323





## Review

## Characteristics and environmental aspects of slag: A review

Nadine M. Piatak<sup>a,\*</sup>, Michael B. Parsons<sup>b</sup>, Robert R. Seal II<sup>a</sup><sup>a</sup>U.S. Geological Survey, 954 National Center, Reston, VA 20176, United States<sup>b</sup>Geological Survey of Canada, 1 Challenger Drive, Dartmouth, Nova Scotia B2Y 4A2, Canada

## ARTICLE INFO

## Article history:

Available online 30 April 2014

## ABSTRACT

Slag is a waste product from the pyrometallurgical processing of various ores. Based on over 150 published studies, this paper provides an overview of mineralogical and geochemical characteristics of different types of slag and their environmental consequences, particularly from the release of potentially toxic elements to water. This chapter reviews the characteristics of both ferrous (steel and blast furnace Fe) and non-ferrous (Ag, Cu, Ni, Pb, Sn, Zn) slag. Interest in slag has been increasing steadily as large volumes, on the order of hundreds of millions of tonnes, are produced annually worldwide. Research on slag generally focuses on potential environmental issues related to the weathering of slag dumps or on its utility as a construction material or reprocessing for secondary metal recovery. The chemistry and mineralogy of slag depend on the metallurgical processes that create the material and will influence its fate as waste or as a reusable product.

The composition of ferrous slag is dominated by Ca and Si. Steel slag may contain significant Fe, whereas Mg and Al may be significant in Fe slag. Calcium-rich olivine-group silicates, melilite-group silicates that contain Al or Mg, Ca-rich glass, and oxides are the most commonly reported major phases in ferrous slag. Calcite and trace amounts of a variety of sulfides, intermetallic compounds, and pure metals are typically also present. The composition of non-ferrous slag, most commonly from base-metal production, is dominated by Fe and Si with significant but lesser amounts of Al and Ca. Silicates in the olivine, pyroxene, and melilite groups, as well as glass, spinels, and SiO<sub>2</sub> (i.e., quartz and other polymorphs) are commonly found in non-ferrous slag. Sulfides and intermetallic compounds are less abundant than the silicates and oxides. The concentrations of some elements exceed generic USEPA soil screening levels for human contact based on multiple exposure pathways; these elements include Al, Cr, Cu, Fe, Mn, Pb, and Zn based on bulk chemical composition. Each slag type usually contains a specific suite of elements that may be of environmental concern. In general, non-ferrous slag may have a higher potential to negatively impact the environment compared to ferrous slag, and is thus a less attractive material for reuse, based on trace element chemistry, principally for base metals. However, the amount of elements released into the environment is not always consistent with bulk chemical composition. Many types of leaching tests have been used to help predict slag's long-term environmental behavior. Overall, ferrous slags produce an alkaline leachate due to the dissolution of Ca oxides and silicates derived from compounds originally added as fluxing agents, such as lime. Ferrous slag leachate is commonly less metal-rich than leachate from non-ferrous slag generated during base metal extraction; the latter leachate may even be acidic due to the oxidation of sulfides. Because of its characteristics, ferrous slag is commonly used for construction and environmental applications, whereas both non-ferrous and ferrous slag may be reprocessed for secondary metal recovery. Both types of slag have been a source of some environmental contamination. Research into the environmental aspects of slag will continue to be an important topic whether the goal is its reuse, recycling, or remediation.

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## 1. Introduction

Slag examined in this study is defined as the predominantly silicate and oxide by-product derived from smelting metallic ore. The two main types of slag included in this discussion are from the primary production of ferrous ores, from iron and steel manufacturing, and from non-ferrous ores, from the recovery of base metals and some precious metals. Other non-ferrous slags include those generated from phosphate, chromite ( $\text{FeCr}_2\text{O}_4$ ), and Al ores, among others; however, these slag types are not discussed due to the limited number of environmental studies on these slags. Slag can also be generated during the recycling of raw materials (i.e., Pb scrap recycling, alkaline battery recycling) and during the vitrification of municipal and nuclear waste. These types of slag are not included in this paper, which focuses on mining and ore processing waste.

Scientific interest in slag has been increasing steadily since the early 1990s. The number of slag studies that are referenced in this paper by publication date is shown in Fig. 1 (see Appendices A and B). Research on slag can generally be divided into two categories: reuse and environmental effects. Studies of slag reuse fall into three main areas: the utility of slag as a construction material, metal recovery from slag, and slag use in environmental remediation applications (Appendix B). Many of these studies, most commonly on ferrous slags, characterize and test the geotechnical properties of slag from an engineering and construction

perspective. Environmental studies, most commonly on non-ferrous slag, focus on understanding the potential environmental impacts of slag deposited as waste, and concentrate on the geochemical and mineralogical properties of the material.

Large volumes of slag are produced during the process of removing metals from ore and, thus, extensive slag dumps are

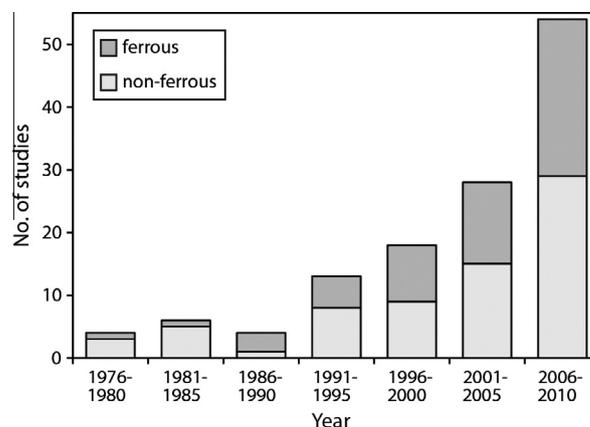


Fig. 1. Number of slag studies published by year between 1975 and 2010 that are included in this review (See Appendices A and B for references).

present at both historical and modern smelting sites. In the past, the lack of environmental regulations and limited scientific understanding of slag's environmental behavior resulted in little public concern regarding slag waste and its reuse. More recent studies indicate that some types of slag do contain high concentrations of potentially toxic elements such as As, Ba, Cd, Cu, Pb, and Zn (Costagliola et al., 2008; Ettler et al., 2009b; Piatak and Seal, 2010). Globally, there is increasing concern over the potential environmental impacts of slag. Slags were and still are widely used as construction materials and are increasingly used in environmental applications. Characterization of the environmental aspects of slag helps to evaluate its potential to release contaminants and its suitability as a potential resource.

This paper is a review of over 150 published studies on slag, and incorporates some new data generated by the authors on steel slag from the Chicago (USA) area. Appendices A and B list the studies included in this review, identify the slag types in each article, as well as the types of data included in this chapter. We first present an overview of the metallurgical processes that create ferrous and non-ferrous slag followed by a discussion of the methods used to characterize slag. The next section is a summary of the chemical and mineralogical characteristics of slag. Next we focus on environmental aspects of slag presenting a comparison of the bulk chemical composition to relevant environmental guidelines, followed by discussions on secondary weathering products that form on slag, on the quantification of their acid-generating and acid-neutralizing potentials, and then on the chemistry of leachates produced when aqueous solutions interact with slag. A few case studies are then highlighted for each slag type to illustrate salient points. The last section focuses on slag as a resource with a discussion of its various uses. Overall, this review paper focuses on characterizing slag and discussing its potential environmental impacts and its role as a valuable resource for reuse and recycling.

## 2. Metallurgical overview

### 2.1. Ferrous slag

Ferrous slags are created during the recovery of Fe from natural ores or recycled materials to produce either Fe or steel. Different types of slag are produced in the various furnaces used. Blast furnace slag (i.e., Fe slag) is produced in a blast furnace simultaneously with Fe. Iron oxides are reduced to molten Fe in the furnace by adding a flux such as limestone or dolomite and a fuel and reductant such as coke (Fig. 2). Molten Fe slag can solidify by slow cooling under atmospheric conditions (air cooled), moderate cooling with the use of controlled amounts of water (expanded or foamed), quick cooling in air (pelletized), or quenching with high-volume, high-pressure sprays of water (granulated). The rate and method of cooling affect the properties of the slag, which influence its commercial uses. Air-cooled slags are crystalline and vesicular, expanded slags are a porous crystalline and glassy material, pelletized slags are glassy and crystalline pellets, and granulated slags are vitrified granules (Fig. 3) (Lewis, 1982). The hard and dense nature of the air-cooled slag makes it suitable as a construction aggregate. The strong cementitious properties of granulated slag help increase its long-term strength when added to concrete. Pelletized and expanded slag is commonly used as a lightweight aggregate because of its low density (Van Oss, 2013).

Steel slags are produced when the molten Fe from the blast furnace and scrap steel are combined with alloys to produce a particular type or grade of steel (Fig. 2). The types of primary steel slag are usually categorized based on the type of furnace used in the creation: open hearth, basic oxygen furnace (BOF), and electric arc furnace (EAF). The open hearth process uses waste gases from the molten Fe to generate temperatures reaching 2000 °C, but has now been replaced in most countries by BOFs and EAFs. A BOF uses large amounts of oxygen to oxidize the charge, which is mostly

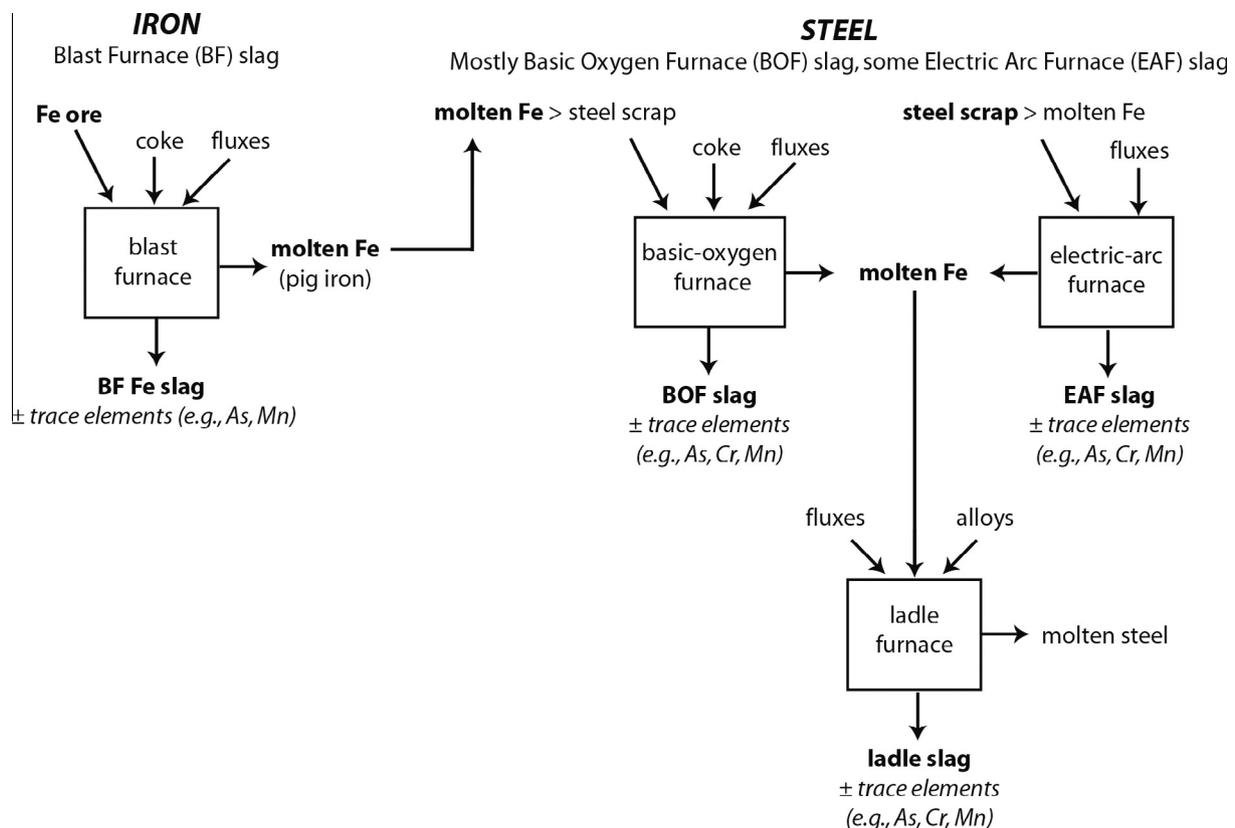
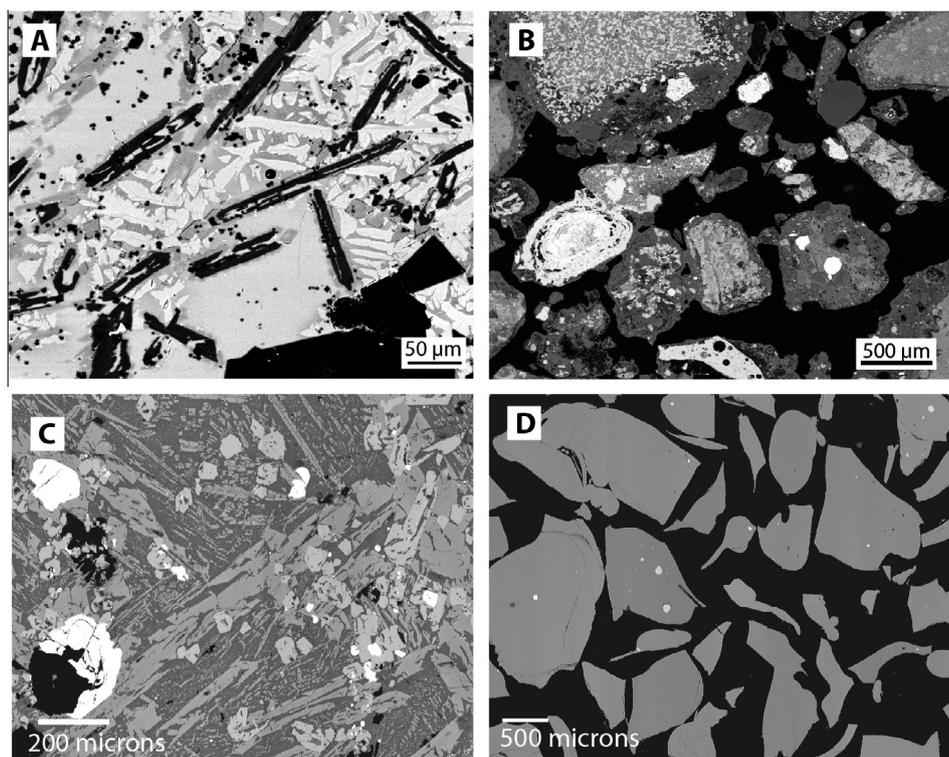


Fig. 2. Schematic of slag generation in a blast furnace operation to produce iron and in a modern steel plant to produce steel (modified from Yildirim & Prezzi, 2011).



**Fig. 3.** Backscattered scanning electron photomicrographs of slag. (A) Air-cooled pre-1900 blast furnace iron slag from the Hopewell Furnace National Historic Site in Pennsylvania, USA. Image shows euhedral spinel and skeletal olivine laths within a background of skeletal pyroxene (dark gray), glass (light gray), and subhedral melilite (white) (from Piatak and Seal, 2012a). (B) Pelletized steel slag from Chicago. Image illustrates the heterogeneous nature of the pellets that are composed of a wide variety of minerals including: quartz, larnite, melilite, brownmillerite, spinel group, wüstite, brucite, calcite, and Fe metal (from Piatak and Seal, unpublished). (C) Air-cooled Cu slag from the Elizabeth mine, Vermont, USA. Image shows randomly oriented elongate skeletal laths of olivine (dark grey), euhedral spinel (grey), and fine to coarse-sized sulfide blebs (white) set in a glass matrix (from Piatak et al., 2004). (D) Granulated Cu slag from Copper Basin, Tennessee, USA. Image shows sulfide blebs (light grey) set in glass (dark grey) mounted in epoxy resin (black) (from Piatak et al., 2004).

molten Fe with lesser amounts of scrap steel. An EAF uses an electric current to produce the heat necessary to melt recycled steel scrap with lesser amounts of molten Fe from the blast furnace. The temperatures in these furnaces fluctuate but commonly reach approximately 1650 °C (Brandt and Warner, 2009). Steel slags are usually slowly cooled under atmospheric conditions and form crystalline materials. In addition to slag produced in the primary stage of steelmaking, slags are also produced in secondary steel refining operations that adjust C content and remove remaining S, gases or impurities. Molten Fe from the BOF and EAF process may be refined in a ladle furnace with the possible addition of alloys and fluxes to produce different grades of steel. Slag produced in this process is ladle slag (Fig. 2). Steel furnace slags are cooled similarly to iron slags, have similar properties, and are used for similar purposes. However, some steel slags expand and need to be cured in piles before use (Van Oss, 2013).

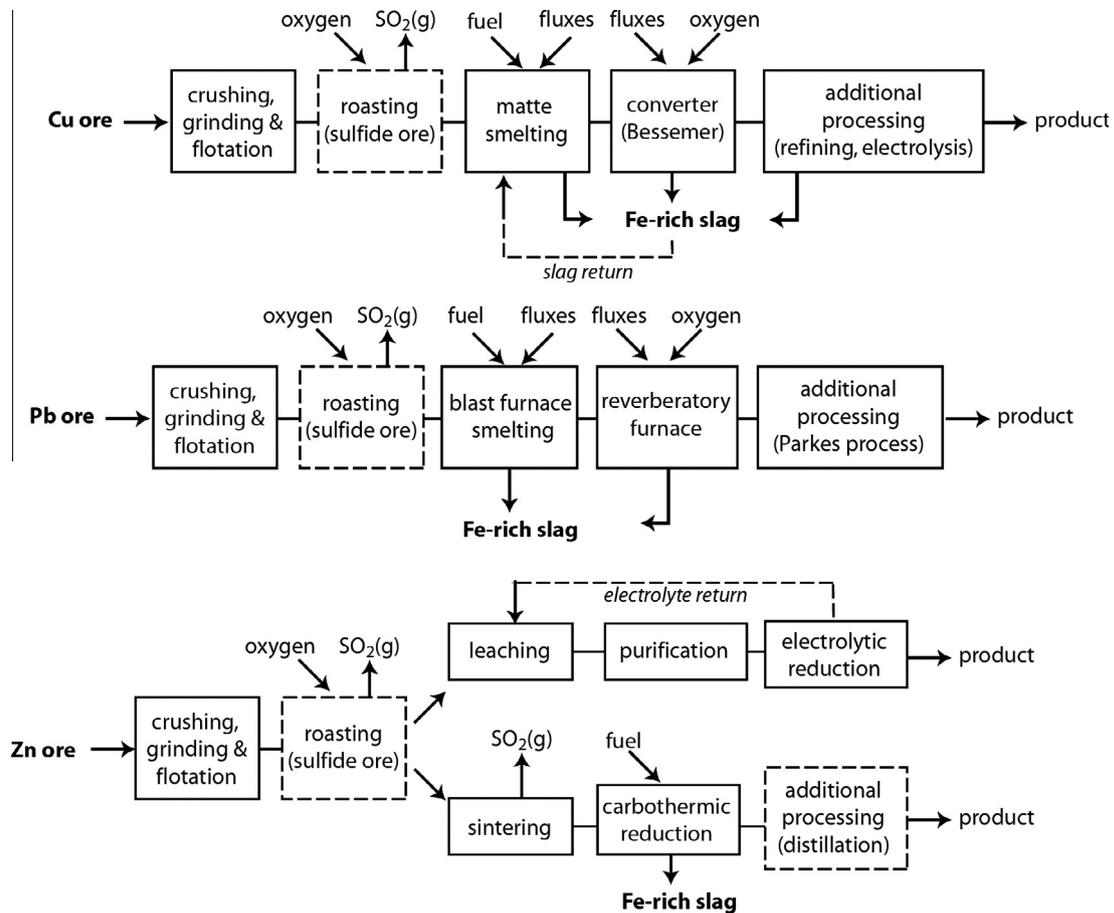
Van Oss (2013) estimated that 0.25–0.30 tonnes of slag are generated per tonne of crude or pig iron in modern blast furnaces for typical Fe ore grades (60–66% Fe). For steel production, furnaces typically produce 0.2 tonnes of slag per tonne of crude iron, but the slag, up to half of which is metal, is returned to the furnace for further metal recovery. After final processing, the steel slag generated is approximately 10–15% of crude steel output. Based on Fe and steel production data, approximately 260–330 Mt of blast furnace Fe slag and approximately 150–220 Mt of steel slag were produced world-wide in 2011 (Van Oss, 2013).

## 2.2. Non-ferrous slag

Non-ferrous slags discussed in this chapter are produced during the recovery of non-ferrous metals from natural ores. Fig. 4

illustrates the general process for producing non-ferrous slag for base-metal production from sulfide ores. In general, three critical steps are involved in processing Cu, Ni, and Pb sulfide ores: concentrating, roasting, and smelting (Fig. 4). After mining, ore is generally crushed and ground and concentrated using gravity or, more commonly, flotation methods to separate the ore minerals from gangue. Next, the roasting process oxidizes sulfide minerals and aids in the removal of S, which is emitted as SO<sub>2</sub>. During the smelting step, SiO<sub>2</sub>, limestone, or iron sources (e.g., ironstone, iron silicates or iron oxides) are added as fluxes and carbon in the form of coke, charcoal, coal, or wood is added as a fuel and reductant. For Cu ores, the matte or molten metal phases are separated from the slag and enter the converter. During conversion, the melt is further desulfurized and other impurities removed by adding oxygen and fluxes (e.g., lime, Fe ore, or basic slag) (FHWA, 1997). The free metal is frequently combined with other elements or compounds to form the desired alloys. Slag is produced during smelting, converting, and some possible additional refining steps. Some is recycled to the smelter because of its high metal content (Fig. 4).

Nickel ore, which is commonly associated with Cu sulfide ore, may be processed with the Cu ores during concentrating, roasting and smelting. However, the combined Cu and Ni matte is roasted and then reduced with carbon or leached with acid to separate the Cu and Ni; additional refining further purifies the metals (Rosenqvist, 2004). Lead sulfide concentrates are roasted and then reduced in a blast furnace with a carbon fuel source and Ca and Fe compounds as fluxes (Cottrell, 1995). Next, additional impurities are removed in a reverberatory furnace by selective oxidations and then silver can be separated by the Parkes process (Cottrell, 1995). Non-ferrous ores can also be processed by leaching (hydrometallurgy) and/or reduction (electrometallurgy) methods such as



**Fig. 4.** General flow diagrams for processing non-ferrous ores and slag production. Not all metallurgical processes used to recover base metals are represented. Modified from Cottrell (1995), FHWA (1997), and Rosenqvist (2004).

shown in Fig. 4 for Zn ores; slag is generated during reduction by carbon (i.e., carbothermic reduction).

Sulfide ores are predominantly processed by pyrometallurgical techniques, resulting in a slag. However, not all base metals are extracted from sulfide ores. For example, Cu can be extracted from oxides and carbonate ores, Pb from carbonate or sulfate ores, Zn from oxide, carbonate, or silicate ores, and Ni from oxide, silicate, or carbonate ores. The optimal recovery methods for some of these ores may or may not involve pyrometallurgy. Most of the studies reviewed here are from the pyrometallurgical processing of sulfide ores. An example of a study on slag that was produced from a non-sulfide ore is that associated with the extraction of Ni from laterite ores discussed in Kierczak et al. (2009). Precious metals such as Ag or Au may also be extracted from base-metal ore. For the purposes of this review, base-metal slag includes some slags produced during the recovery of precious metals as well. There are several other types of slag generated from processing natural ores such as phosphate, chromite, and Al slag that are not included in this review.

The types of furnaces used to smelt non-ferrous ore include blast, reverberatory, electric arc, or oxygen flash furnaces. An oxygen flash furnace injects compressed oxygenated air to promote combustion of the furnace charge. In contrast to furnaces where the fuel and materials are mixed in a single chamber, a reverberatory furnace typically separates the material being processed from the hot gases, but not from the combustion gases. Copper, Ni, Pb, and Sn ores are commonly smelted in reverberatory furnaces. Blast furnaces have been used to smelt Cu, Pb, Sn, and Zn ores, and oxygen flash furnaces to process Cu ore. In addition to blast furnaces, Zn ores are commonly processed in a retort where Zn reduction

and distillation take place simultaneously. In this type of furnace, the fuel and all of the products of combustion are isolated from each other. Non-ferrous slags are commonly removed from the furnace and cooled slowly under atmospheric conditions creating a crystalline porous material (Fig. 3C). These slags are less commonly quenched forming a glassy product (Fig. 3D).

Furnace temperatures vary for non-ferrous smelters based on the type of furnace, processing methods, and composition of the ore; temperatures may reach up to 1400 °C (Cottrell, 1995). Although modern smelter operations have specific optimal furnace temperatures, historical furnaces likely had less rigorous temperature controls. A few studies report inferred temperatures for historical furnaces that smelted different types of ore and include the following: Sáez et al. (2003) proposed a furnace temperature of approximately 1200 °C for the smelting of Cu-sulfide, Cu-carbonate, and Cu-oxide ores in Spain during the 21st century B.C.; Manasse et al. (2001) reported slightly over 1100 °C for smelting Cu-sulfide ores in Italy during the 13th century or before; Kierczak and Pietranik (2011) stated a furnace temperature of approximately 1200 °C for 14th to 16th century Cu slag from Poland; and Lottermoser (2002) suggested temperatures likely over 1000 °C for late-1800 to mid-1900 furnaces that generated base-metal slag from a variety of ores in Australia.

The amount of slag produced in comparison to the amount of metal produced varies based on the commodity. Sobanska et al. (2000) estimated that 0.6 tons of slag were generated per ton of Pb for a smelter in France. In contrast, approximately 2.2 tonnes of slag are generated for every tonne of Cu produced according to Gorai et al. (2003) for a worldwide estimate.

### 3. Methods used to characterize slag

#### 3.1. Empirical

##### 3.1.1. Bulk chemistry

Characterization of the bulk chemical composition of slag is essential to understanding its nature and environmental behavior. Analytes of interest include, but are not limited to major, minor, and trace elements, loss on ignition (LOI), C and S species, and occasionally, stable isotopes. Solid slag material may be leached with different solutions to investigate the mobility of various elements (i.e., standardized leaching tests, sequential extractions). These partial digestion methods can also provide information on the solid-phase partitioning of metals. Instrumental methods used for analysis of either the solid material, sometimes after the solid is completely digested, or partial digestion solutions each have advantages and disadvantages and are generally used in some combination (see Crock et al., 1999 for detailed descriptions of methods and their advantages). For total sample analysis, some of the most commonly used techniques are X-ray fluorescence (XRF), inductively coupled plasma-mass spectroscopy (ICP-MS), inductively coupled plasma-atomic emission spectroscopy (ICP-AES), atomic absorption spectroscopy (AAS), and automated elemental analysis (EA) by combustion for C, N, S, and/or H (Fig. 5). Other methods reported include infrared analysis (IR) for C and S, neutron activation (NA), hydride generation (HG) for Hg, and gravimetric and volumetric analysis and photometry (GVP). The most commonly used methods to analyze slag chemistry based on over 70 studies are consistent with common methods of analysis for environmental samples reported by Crock et al. (1999).

##### 3.1.2. Mineralogy

Many slag studies also report information on slag mineralogy. Although synthetically produced phases such as those found in slag samples are not minerals by definition, mineralogical terminology is used in this manuscript for the sake of clarity in their description. The majority of slag characterization studies included mineralogical analysis, with the most common mineralogical method being X-ray diffraction (XRD) (Fig. 5). X-ray diffraction is a relatively quick method used to identify crystalline phases present in solid samples. In addition to XRD, scanning electron microscopy (SEM) and electron microprobe analysis (EMPA) are also commonly used to characterize slag. Both SEM and EMPA can be used to determine the chemical composition of the various phases, including glass, which is not easily identified or quantified using

XRD. The host phases for environmentally significant trace elements can also be determined. Also, Raman spectroscopy has also proved useful in identifying secondary weathering products on slag (Seigneur et al., 2007; Kierczak et al., 2013).

There are numerous challenges associated with characterizing the mineralogy of slag. First, quantifying the relative amounts of crystalline and amorphous phases in slag is a complex task. Quantification of phases can be estimated by petrographic methods such as point counting or by analyzing XRD patterns using single line, pattern summation, or Rietveld techniques, among others. Glass is generally ubiquitous in slag and only a few studies have attempted to quantify it (e.g., Parsons et al., 2001; Piatak et al., 2004; Piatak and Seal, 2010). Quantification of amorphous phases in samples can be challenging; Piatak and Seal (2014) discussed some of the challenges mentioned herein. For example, Rietveld XRD analysis requires a known amount of a crystalline internal standard to be added to the sample, homogenized, and analyzed. The addition of a standard can cause ‘dilution’ of phases or peak overlap issues. Examples of XRD patterns of pure glass, only crystalline phases, and a mixture of both crystalline and glass are shown in Fig. 6A for synthetic mixtures. The presence of glass raised the background in the approximately 20 to 40 degrees 2-theta interval in the pattern. Glasses with different compositions display different XRD signatures as illustrated in Fig. 6B for three glasses with three different silica contents. These results show that in order to confidently quantify crystalline phases and glass in slag, the accuracy of the method needs to be assessed using synthetic mixtures similar in composition to the slag phases.

Another challenge associated with characterizing the mineralogy of slag relates to EMPA analysis to determine the major and trace element composition of various phases. X-ray diffraction can provide insight into the major element composition of some phases, but is not definitive because of solid-solution effects. Neither SEM nor XRD can be used to quantify trace amounts of elements in phases. EMPA, the most commonly employed technique to determine the chemical composition of phases, can have unavoidable peak overlaps among elements within the mineral, which can result in erroneous measured concentrations. Overlaps may be minimized by changing the instrument and analysis settings but peaks for some elements will inevitably overlap. Examples of peak overlaps may include As and Mg in silicates and oxides and Co and Fe in all phases. In order to correct for peak overlaps, if the instrument configuration cannot be changed, users can determine an apparent amount or ‘phantom’ concentration due solely to the overlap by analyzing standards with known compositions or by employing data-reduction algorithms that correct for peak overlaps. For example, trace amounts of phantom Co will be reported for phases with significant Fe. In Piatak et al. (2004), the concentrations of Co in sulfides with greater than approximately 7 wt.% Fe were adjusted for the peak overlap; phantom Co concentrations were approximately 0.2% of the Fe concentration. Also, overlap corrections will need to be determined each time data are collected because the instrument settings vary for each analysis package and settings may change over time as parts age and users adjust the instrument.

In addition to EMPA peak overlaps, recent investigations suggest that some of the standard micro-analytical mineralogical methods, such as EMPA and SEM, may need to be supplemented by techniques that can determine mineralogical and chemical variations on the nano-scale to accurately characterize a slag material. For example, Seigneur et al. (2007) found discrete submicrometer-size Pb-rich and Fe-rich entities within Pb-slag glass using Raman spectroscopy and transmission electron microscopy (TEM). Using focused ion beam TEM, Ettler et al. (2012) revealed that K-rich pyroxenes reported in Cu slag from Zambia (Vítková et al., 2010) were actually an admixture of the nanometer-size leucite

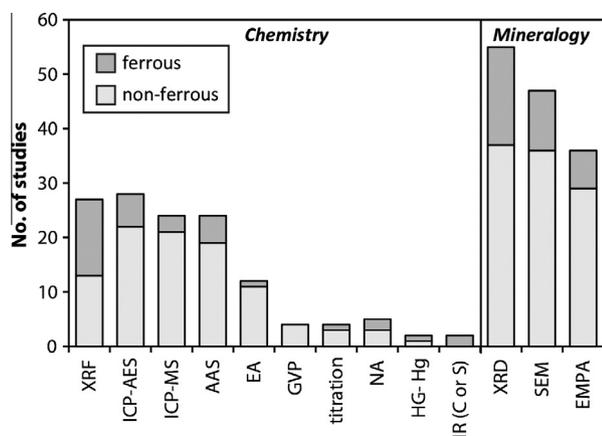


Fig. 5. Number of times methods were used to characterize the chemistry and mineralogy of slag from over 70 published studies. See text for abbreviations and Appendix A for references.

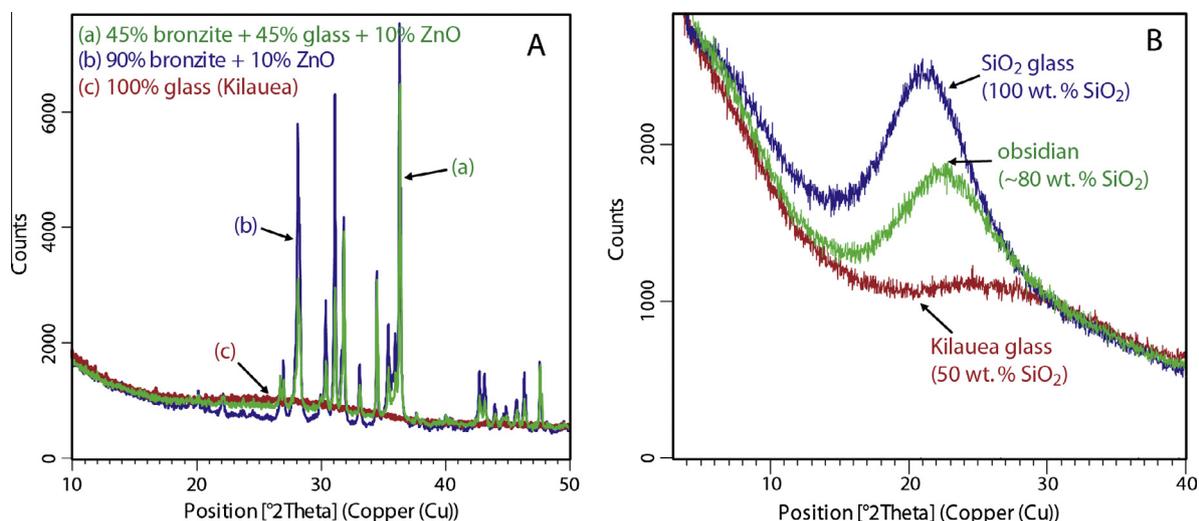


Fig. 6. X-ray diffraction patterns of (A) synthetic mixtures of crystalline and glass phases and (B) glass of varying SiO<sub>2</sub> compositions.

(KAlSi<sub>2</sub>O<sub>6</sub>) inclusions within the pyroxene((Na,Ca)(Mg,Fe,Al)(Al,Si)<sub>2</sub>O<sub>6</sub>); the inclusions were not detected during SEM and EMPA work. These studies suggest that some caution is required when interpreting and reporting EMPA data for phases in slag that may be a mixture of phases on a nanometer-scale. Glass analyses, in particular, may be suspect due to the immiscibility between silicate and sulfide liquids (Ettler et al., 2012).

Yet another challenge associated with determining the composition of phases in slag is deciphering the speciation of elements that occur in multiple valence states. Sulfur speciation is particularly important because of its relationship to the acid-generating potential of slag. For example, Piatak and Seal (2012a) reported S concentrations in glass and melilite ((Ca,Na)<sub>2</sub>(Mg, Fe<sup>2+</sup>, Al, Si)<sub>3</sub>O<sub>7</sub>) in historical Fe slag from Pennsylvania, USA. In order to verify that the S was in the reduced (S<sup>2-</sup>) state versus the oxidized state (S<sup>6+</sup>), the wavelength of SK $\alpha$  in the glass and melilite were compared to that of sulfate and sulfide standards using EMPA. This method is based on determining S speciation in experimental glasses by Carroll and Rutherford (1988). One limitation of the method is that a significant amount of S needs to be present (>~1 wt.% S) in the phase in order to accurately measure the peak position used to determine valence. For the Pennsylvania Fe slag, sulfur was determined to be in the reduced state, which is in agreement with the reducing furnace conditions in this smelter. In contrast, determining S speciation using X-ray absorption near edge structure (XANES) spectroscopy has been achieved on samples containing as little as 450 mg/kg S for synthetic and natural glasses by Paris et al. (2001). XANES spectroscopy is an element-specific X-ray absorption technique that provides information about the local bonding of elements, which can be related to their valence state. Roy (2009) applied the XANES technique to steel slag and was able to estimate the relative amounts of more than one species of S. His results indicated that S was present as SO<sub>4</sub><sup>2-</sup> in air-cooled Fe slag and mostly as S<sup>2-</sup> in granulated Fe slag.

### 3.1.3. Leaching tests

Leaching tests are used to investigate the mobility of trace elements in solid wastes and to help predict their long-term environmental behavior. There are many types of leach test procedures that vary based on the sample preparation, leachant composition, method of contact, solid-to-solution ratio, leachant renewal, temperature, contact time, and ultimately purpose, among others. The most commonly employed leaching tests can be divided into several types. First, single batch tests are agitated to maintain a homogenous mixture to aid in achieving steady state conditions.

Usually crushed or sieved, samples are mixed with a leachant solution at a specific ratio, with no leachant renewal. Single batch tests developed by the United States Environmental Protection Agency (USEPA) for regulatory compliance include the toxicity characteristic leaching procedure (TCLP), which replaced the extraction procedure toxicity test (EP-tox) in 1990, and the synthetic precipitation leaching procedure (SPLP) (USEPA, 2008). These two standard procedures use dilute acidic leachant solutions (acetic acid or acetate buffer for TCLP and EP-tox and sulfuric/nitric acid solution for SPLP) with a contact time of 18 h. The liquid-to-solid ratio is 20:1 (volume to mass) for material that is less than 9.5 mm in diameter (crushed if necessary). Fig. 7 summarizes the number of times various types of leaching tests have been conducted on slag based on the references listed in Appendix A. As shown, the USEPA tests are some of the most commonly used based on this survey. Another single batch test frequently applied to non-ferrous slag is the EN 12457-2 (Fig. 7), which was established by the European Committee for Standardization (European Committee for Standardization, 2002). This procedure uses distilled/deionized water as the leachant with a contact time of 24 h. The liquid-to-solid ratio is 10:1 using material with a particle size of less than 4 mm in diameter. Several studies have also reported reacting the surface of thin sections (i.e., a thin polished slice) of slag with various solutions to study the effect on the dissolution of specific crystalline or glass phases. Less

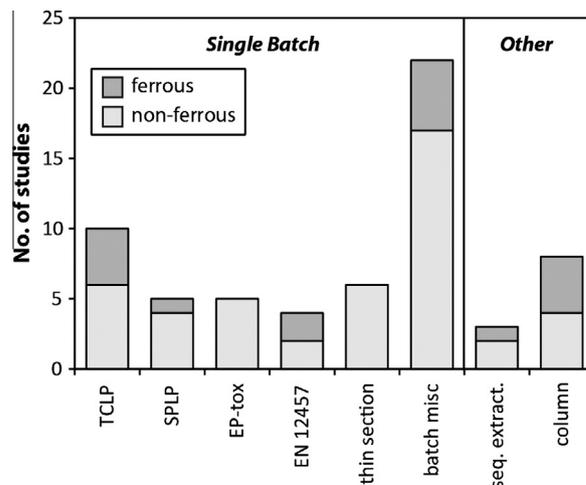


Fig. 7. Number of studies that used various leaching test procedures on slag. This chart is a summary of over 50 studies. See text for abbreviation and Appendix A for references.

commonly used or unique unstandardized procedures for single batch extraction tests were grouped together in Fig. 7. It is apparent from this figure that single batch extraction tests are the most common type of leaching tests used on slag. Sequential chemical extraction tests (seq. extract.) are reported far less commonly (Fig. 7). These tests use increasingly aggressive leachants to gain insight into the partitioning of contaminants among various operationally defined solid phases. In addition to these batch tests, dynamic tests such as flow-through or column tests have been conducted on slag to better understand the kinetic processes controlling metal release (Fig. 7). The leachant continuously or intermittently flows through the material to measure leaching under advective conditions.

Successful application of the results of leaching tests depends on the objective of the study. Many leaching tests are performed to simulate natural weathering of the slag or conditions in a landfill environment. These tests characterize and evaluate the release of potentially harmful trace elements from slag, and are often considered to represent ‘worst-case’ leaching scenarios because of the crushing of the material and constant agitation throughout the leaching test. For example, regulatory compliance tests such as TCLP, EP-tox, and EN 12457 were developed to classify material as hazardous or nonhazardous to determine if material is acceptable for disposal in a landfill without special treatment or handling. The results impact how slag waste is disposed, how slag waste piles are treated, and if and how slag is used as a resource for construction or environmental applications. In contrast, the SPLP test was developed to assess the impact of a material on groundwater and surface water by simulating interaction with atmospheric precipitation (i.e., rain, snow). Also, studies that examine the leaching behavior of the surface of thin sections give insight into which trace-element bearing phases may be the most reactive (Kucha et al., 1996; Seignez et al., 2007, 2008; Ettler et al., 2001b, 2002). Other studies have assessed the bioaccessibility of Pb from slag using simulated human gastric fluid as the extraction solution (Morrison and Gulson, 2007; Bosso and Enzweiler, 2008). Sequential extractions have also been applied to gain insight into element speciation and partitioning into various phases to determine trace element mobility and bioavailability and the related environmental impact of slag dumps (Álvarez-Valero et al., 2009; Pérez-López et al., 2008). In addition, toxicity tests have been performed on Fe and steel leachate to determine ecological risk with respect to reuse (Wendling et al., 2012, 2013). Dynamic tests represent far-from-equilibrium conditions that may more closely mimic slag dump weathering conditions. These tests may emulate field conditions in which secondary minerals containing trace elements precipitate directly from waters during dry periods and subsequently dissolve and release the trace elements into the environment during rainy periods (Navarro et al., 2008; Seignez et al., 2008). In addition to these environmentally-focused tests, some leaching tests are performed to determine an effective means for extracting valuable metals from slag (Gbor et al., 2000). Regardless of the details of the various leaching test procedures, leaching tests on slag can provide useful insight into the character and environmental aspects of slag.

## 3.2. Theoretical

### 3.2.1. Geochemical modeling

Geochemical modeling is a powerful tool that can be used to evaluate the major processes controlling the release, transport, and fate of metals from ferrous and non-ferrous slags during weathering, and to predict the long-term stability of slags under changing environmental conditions (Parsons et al., 2001). There are two main approaches to geochemical modeling: (1) inverse (mass-balance) modeling, which uses observed water compositions to deduce geochemical reactions, and (2) forward

(mass-transfer) modeling, which uses hypothesized geochemical reactions to predict water compositions (Alpers and Nordstrom, 1999). In general, inverse modeling is used to calculate the moles of solid phases and gases that must enter or leave solution to account for differences in the composition of water samples along a known flow path, or from a reaction vessel (Parkhurst and Plummer, 1993). Mass-balance models are based solely on the compositions of water and of possible reactant and product phases, but can be further constrained by knowledge of thermodynamic and kinetic constraints (e.g., Garrels and Mackenzie, 1967; Glynn and Brown, 1996). Calculated mole transfers from inverse modeling serve as a useful guide for forward modeling, which predicts the results of hypothetical, irreversible water–rock–gas reactions applied to an initial solution of known composition (Helgeson, 1968). Forward models can be used to simulate solid phase dissolution and precipitation, fluid mixing, sorption, and other geochemical reactions as a function of time or reaction progress, and are particularly useful for developing remediation strategies for contaminated sites (e.g. Strömberg and Banwart, 1994; Alpers and Nordstrom, 1999; Parsons et al., 2001; Bethke, 2008). A wide range of computer programs are available to carry out geochemical modeling calculations, some of which are described by Alpers and Nordstrom (1999) and Bethke (2008).

The first step in using geochemical models to evaluate the environmental reactivity of smelter slags is to calculate the aqueous speciation of constituents of waters collected from the field (e.g. drainage from slag dumps), or of leachates from slag-leaching experiments. It is important to ensure that water chemistry data used for modeling purposes are of high quality, and include analytical results for all major and minor ions such that electrical charge imbalances are minimized. The output from a speciation calculation shows the distribution of dissolved constituents among various aqueous complexes and free ions for a given set of environmental conditions (temperature, pH, fugacities of CO<sub>2</sub>(g) and O<sub>2</sub>(g), etc.) (Alpers and Nordstrom, 1999). These results can then be used to determine the degree of saturation of the aqueous solution with respect to various phases according to the following equation:

$$SI = \log(Q/K) \quad (1)$$

where *SI* is the saturation index of an aqueous solution with respect to a solid phase, *Q* is the ion activity product and *K* the equilibrium constant for the dissolution reaction. If the *SI* is zero the solution composition reflects solubility equilibrium, a negative value indicates undersaturation, and a positive value indicates supersaturation. Once the saturation indices of various phases are known, the user can then determine what dissolution and precipitation reactions are thermodynamically possible in the absence of kinetic barriers (Parkhurst and Plummer, 1993).

Over the last two decades, many researchers have used aqueous speciation modeling to better understand the reactivity of slags in the field and in the lab. Most of these studies have focused on calculating the saturation indices of various solid phases in leachates from batch and flow-through leaching tests to evaluate possible solubility controls on metal concentrations (Bäverman et al., 1997; Mandin et al., 1997; Piatak et al., 2004; Seignez et al., 2008; De Windt et al., 2011). Some authors have also applied speciation modeling to waters draining slag dumps in the field to assess the main controls on dissolved metal concentrations (Parsons et al., 2001; Lottermoser, 2002; Roadcap et al., 2005; Navarro et al., 2008). In general, solid phases with saturation indices relatively close to zero (−1.0 *SI* +1.0) may control the solubility of elements in solution, provided these phases are kinetically likely to form within the timeframe of a leaching test, or during the transit of water through a slag dump (Nordstrom and Alpers, 1999). Observations of reacted slags in the lab or field can provide

direct evidence of secondary minerals that are most likely to control the mobility of elements during leaching tests or weathering reactions (e.g., Parsons et al., 2001; Lottermoser, 2002; Piatak et al., 2004; Roadcap et al. 2005; Navarro et al., 2008). The formation of secondary minerals can significantly reduce the mobility of elements released from both ferrous and non-ferrous slags during leaching or natural weathering reactions, although not necessarily rendering them environmentally benign; secondary minerals must be carefully chosen in geochemical modeling calculations.

Inverse modeling has not been widely used in studies of slags, but it can provide insight into the relative importance of solid phase dissolution and precipitation reactions (Parsons, 2001; Piatak et al., 2004). For example, Piatak et al. (2004) used mass-balance calculations of slag test leachates to show that the leachate chemistry cannot be explained strictly through dissolution of the primary crystalline and glass phases identified in the slag. Instead, precipitation of secondary phases such as  $\text{Al}(\text{OH})_3$  and ferrihydrite ( $5\text{Fe}_2\text{O}_3 \cdot 9\text{H}_2\text{O}$ ) was required to fully account for the observed leachate chemistry. The calculated mass balances can be used to evaluate the relative reactivity of various slag phases, and to identify the key processes that control the aqueous concentrations of specific trace elements in slag test leachates and drainage from slag dumps (Parsons, 2001).

Forward modeling can be used to predict the long-term (i.e., tens to hundreds of years) leaching behavior of slags when properly constrained through careful field and laboratory studies. Early applications of forward modeling of smelter slags combined the results of laboratory leaching tests with reactive transport models to simulate the flow of surface water through a slag dump or the migration of metals into underlying soils (Tack et al., 1993; Bäverman et al., 1997; Mandin et al., 1997). However, the predictive capability and reliability of these models were limited by incomplete characterization of slag mineralogy and reactive surface area, uncertain equilibrium assumptions, insufficient field data with which to compare model results, and a lack of thermodynamic data for key phases and their solid solutions. In some cases, the leachate concentrations predicted from these models did not match the measured concentrations in relatively simple laboratory column tests, casting doubt on their ability to model long-term slag leaching in the natural environment (Bäverman et al., 1997). To improve the accuracy of forward models for slags, it is particularly important to include kinetic rate laws for dissolution of all crystalline and glass phases, given their relatively slow reaction rates at low temperatures (Wilson, 1994; Alpers and Nordstrom, 1999; De Windt et al., 2011).

Parsons et al. (2001) used forward modeling to simulate irreversible mass-transfer reactions between base-metal slag deposits and lake water at the Penn Mine in California. These models included kinetic rate laws for abiotic sulfide oxidation and surface-controlled dissolution of silicate, oxide, and glass phases in the slag. The surface area of slag in contact with 1 kg of lake water (the default fluid mass in these models) was estimated by measuring the grain-size distribution of the finer-grained material in the slag dump and calculating the specific geometric surface area. The reactive surface area of each crystalline or glass phase was then estimated by multiplying the total physical surface area by the average volume percentages of each phase in the slag. Reaction rates for dissolution and oxidation of phases in the slag were selected from the published literature based on their applicability over the range of pH values measured at the Penn Mine field site. The reaction rate for a metal-rich, interstitial glass phase in the slag was calculated from TCLP and SPLP leach test results (Parsons et al., 2001). The results of these modeling calculations suggested that the dissolved concentrations of Ba, Cu, Fe,  $\text{SiO}_2$  and  $\text{SO}_4$  in the slag dump pore waters were primarily controlled by the solubilities of various secondary minerals (Fig. 8), whereas Pb concentrations

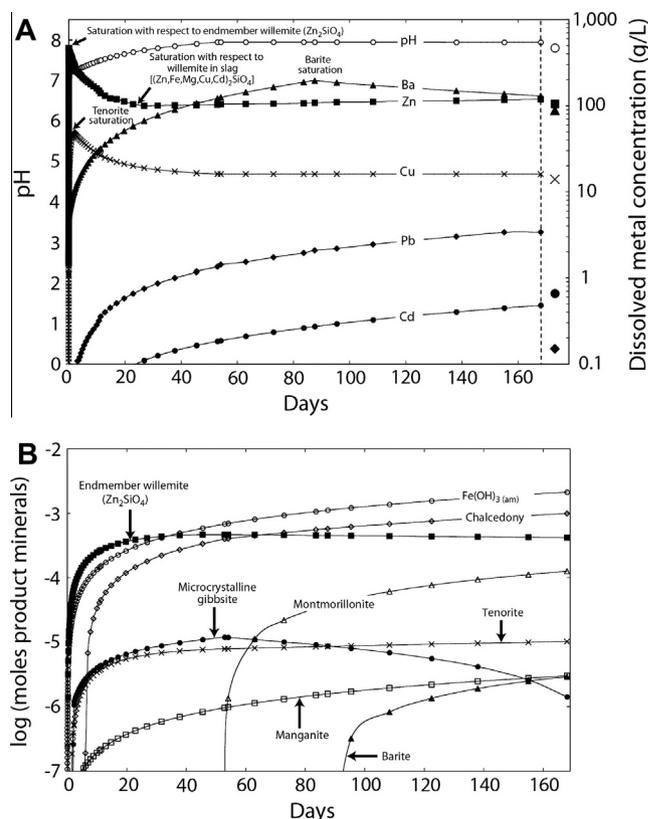


Fig. 8. (a) Dissolved metal concentrations and pH during forward modeling of reactions between Cu slag and lake water, Penn Mine, California. Field data for the slag dump pore waters are represented by the larger symbols to the right of the dashed vertical line. (b) Secondary minerals produced during forward modeling simulation of irreversible mass-transfer between the Penn Mine slag dump and lake waters. (From Parsons et al., 2001).

were most likely controlled by sorption and/or co-precipitation reactions (Parsons et al., 2001). The modeling results provide important insights into the main geochemical processes that control the release of elements from this slag dump, and how these may change over time in response to various remediation strategies. More recently, De Windt et al. (2011) have applied a similar forward modeling approach to basic oxygen furnace steel slags.

## 4. Chemical and mineralogical characteristics

### 4.1. Ferrous slag

#### 4.1.1. Bulk chemistry and primary mineralogy

Ferrous slag composition is dominated by Ca and Si with variable amounts of Al, Fe, and Mg. Table 1 contains a summary of ferrous slag chemistry from nearly 40 sources; ferrous slag references containing bulk chemical compositions included in the table are listed in Appendix A. Major element concentrations are reported as oxides, which is the common convention for expressing major-element bulk chemical concentrations as well as the chemical composition of crystalline oxides and silicates. This enables slag compositions to be plotted on ternary phase diagrams. However, some major elements have been shown to exist in other than oxide forms. For example, Fe is commonly reported as  $\text{FeO}$  or  $\text{Fe}_2\text{O}_3$  but in some slag it is present as minor or trace  $\text{FeS}$  or Fe metal. For each slag type, Table 1 lists the minimum, maximum, and average values, as well as the number of samples or analyses (n1) and the number of studies (n2) that reported the chemistry; values below the detection limit were not included in the compilation. Analyses include tables from reports that have published a summary of

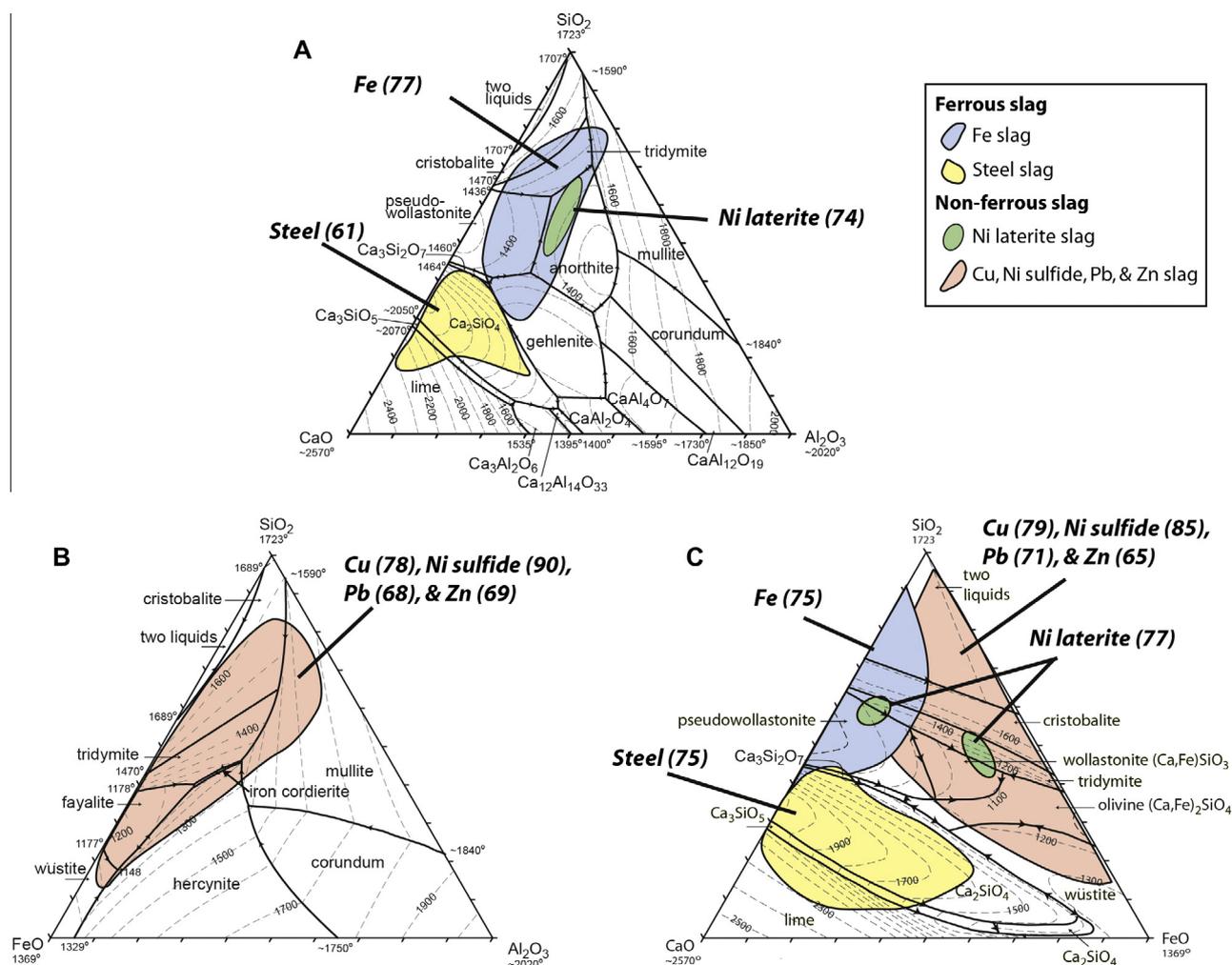
**Table 1**

Summary of major, minor, and trace element chemistry of slag by slag type from almost 70 studies. All concentrations were included for samples identified as slag by the article's authors. Values below the detection limit were not included.

	Fe					Pre-1900 Fe					Steel					Ni laterite					Sn (historical)									
	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2					
<i>wt.%</i>																														
Al <sub>2</sub> O <sub>3</sub>	5.86	41.2	14.3	41	13	3.42	22.3	10.6	42	4	0.02	44.3	7.49	60	25	2.79	18.0	12.9	8	1	3.37	22.1	10.5	25	1					
CaO	0.15	93.4	36.1	38	12	1.34	40.1	15.2	42	4	1.63	70.1	34.9	62	25	9.92	57.6	22.8	8	1	1.66	16.8	6.24	25	1					
FeO total	0.02	13.6	1.60	37	11	0.08	61.8	16.1	42	4	1.07	50.9	22.9	61	25	5.40	33.7	15.2	8	1	4.52	31.0	13.3	25	1					
K <sub>2</sub> O	0.08	5.06	0.99	33	10	0.19	3.67	1.41	37	4	0.01	3.89	0.24	29	13	0.6	2.31	1.25	7	1	0.67	4.89	2.11	25	1					
MgO	1.66	19.6	8.78	41	13	0.14	24.7	8.87	42	4	0.43	19.9	7.22	58	25	2.04	10.1	5.05	8	1	1.17	5.82	2.80	25	1					
MnO	0.01	26	1.90	34	10	0.04	11.6	0.95	42	4	0.2	21.5	4.32	55	25	0.22	1.72	0.71	8	1	0.06	0.29	0.12	25	1					
Na <sub>2</sub> O	0.09	2.65	0.49	33	12	0.06	0.76	0.36	37	3	0.02	0.57	0.16	31	16	0.19	2.24	0.85	7	1	0.33	1.47	0.70	25	1					
S	0.38	3.15	1.27	26	6	0.02	0.96	0.19	20	1	0.03	1.06	0.22	30	8	-	-	-	-	-	-	-	-	-	-					
SiO <sub>2</sub>	26.6	46.1	35.3	41	13	27.2	61.3	45.2	42	4	0.03	61.1	16.9	56	23	18.2	44.6	38.5	8	1	20.9	70.4	40.0	25	1					
TiO <sub>2</sub>	0.02	3.7	0.63	36	9	0.02	1.1	0.79	37	3	0.12	1.98	0.66	37	20	0.09	0.73	0.52	8	1	0.89	10.9	3.16	25	1					
LOI	0.1	4.52	1.86	5	3	0.03	2.26	0.65	9	1	0.2	11.2	3.55	16	7	-	-	-	-	-	0.42	6.62	3.01	25	1					
<i>mg/kg</i>																														
As	0.5	25	6.5	7	2	2	12	4.5	6	1	0.5	244	24.6	16	8	-	-	-	-	-	6.53	26.4	14.7	14	1					
Ba	180	1,110	557	9	4	120	2,030	806	30	2	24	1,800	366	32	10	-	-	-	-	-	99	2,299	480	20	1					
Cd	-	-	-	-	-	0.3	0.3	0.3	1	1	0.1	128	14.7	21	7	-	-	-	-	-	-	-	-	-	-					
Co	0.03	33	9.447	10	4	1	210	58.6	30	2	0.8	36	7.88	27	8	5	700	220	6	1	0.97	14.8	8.11	14	1					
Cr	0.1	9,580	1,032	17	6	2	39	9.1	20	1	4	32,700	4,798	44	13	330	13,400	4,484	8	1	60.7	411	202	25	1					
Cu	0.13	54	15.9	17	6	2.7	300	65.5	30	2	3	540	114	33	9	29	2,200	1,157	5	1	5	96.3	14.3	19	1					
Ni	0.3	68	14.4	11	6	1.1	17.1	7.24	14	1	0.9	3,180	153	31	9	74	6,907	2,154	8	1	5	26.1	13.6	20	1					
Pb	0.2	150	21.7	13	4	0.6	250	73.9	29	2	2	1,040	126	31	9	8	501	246	3	1	5.04	624	81.5	14	1					
Zn	0.15	320	79.5	15	4	1	40	15.4	29	2	1	11,000	748	41	14	13	2,500	1,162	6	1	39.2	111	75.2	14	1					
											Ni sulfide					Cu (± other base metals)					Pb-Ag, Ag-Pb, Pb, Pb-Zn					Zn, Zn-Pb				
	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2	Min	Max	Average	n1	n2					
<i>wt.%</i>																														
Al <sub>2</sub> O <sub>3</sub>	6.72	7.00	6.87	6	1	0.01	18.9	6.17	97	13	1.74	11.1	4.94	27	12	0.9	21.9	14.3	19	3										
CaO	2.74	3.96	3.03	7	2	0.15	21.9	7.06	97	13	0.45	23.1	9.41	30	13	0.18	23.6	11.1	19	3										
FeO total	42.8	47.7	45.2	7	2	0.67	62.0	33.1	107	14	3.16	59.6	26.1	40	14	0.88	33.7	15.5	19	3										
K <sub>2</sub> O	-	-	-	-	-	0.01	4.83	1.35	95	12	0.23	2.58	1.21	25	10	0.04	3.91	1.22	18	2										
MgO	1.56	3.20	2.88	7	2	0.09	6.45	1.79	96	12	0.37	5.44	1.67	25	10	0.61	10.7	4.02	17	2										
MnO	0.06	0.06	0.06	6	1	0.03	6.55	0.54	94	11	0.09	8.95	2.45	29	12	0.01	1.21	0.30	18	2										
Na <sub>2</sub> O	-	-	-	-	-	0.01	4.31	0.45	95	12	0.02	1.4	0.36	34	10	0.05	3.93	0.89	16	2										
S	0.99	1.03	1.01	6	1	0.01	6.51	1.40	91	11	0.12	3.4	0.85	25	11	0.08	2.68	1.08	19	3										
SiO <sub>2</sub>	29	39.3	36.9	7	2	9.82	70.7	35.9	93	12	17.6	54.6	36.7	29	12	2.04	57.1	35.2	19	3										
TiO <sub>2</sub>	0.23	0.24	0.24	6	1	0.1	1.66	0.39	88	11	0.01	5	0.58	22	8	0.07	1.14	0.66	18	2										
LOI	-	-	-	-	-	0.1	11.8	1.73	25	4	-	-	-	-	-	0.36	29.6	6.45	14	2										
<i>mg/kg</i>																														
As	-	-	-	-	-	0.8	75,865	3315	74	9	87	2900	491	32	10	1	10,710	1271	19	3										
Ba	-	-	-	-	-	28	29,000	2226	66	8	169	190,000	20,630	33	9	76	2555	1104	18	2										
Cd	-	-	-	-	-	0.43	14,000	1055	41	11	0.3	700	99.2	9	8	0.8	191	27.0	18	2										
Co	1210	1400	1293	6	1	15	24,104	3317	53	7	6.1	185	41.1	26	5	8.5	242	40.23	10	1										
Cr	-	-	-	-	-	13	7510	455	61	6	19	700	82.3	27	6	4	103	78.4	10	1										
Cu	110	180	140	6	1	1400	353,580	25,088	97	11	88.5	7550	2502	26	10	16	6360	727	10	1										
Ni	2600	2960	2762	6	1	2	935	70.9	65	8	5.6	240	97.1	19	5	24.3	107	46.8	10	1										
Pb	-	-	-	-	-	6.2	183,800	14,205	92	10	5000	319,190	90,657	32	15	1.9	62,290	7302	17	3										
Zn	180	190	187	6	1	44	280,000	36,314	95	10	701	120,000	31,162	40	14	212	379,694	56,569	19	3										

Abbreviations: min = minimum value, max = maximum value, n1 = number of samples, n2 = number of studies that have values, - = data not available.

Note: All iron is reported as FeO.



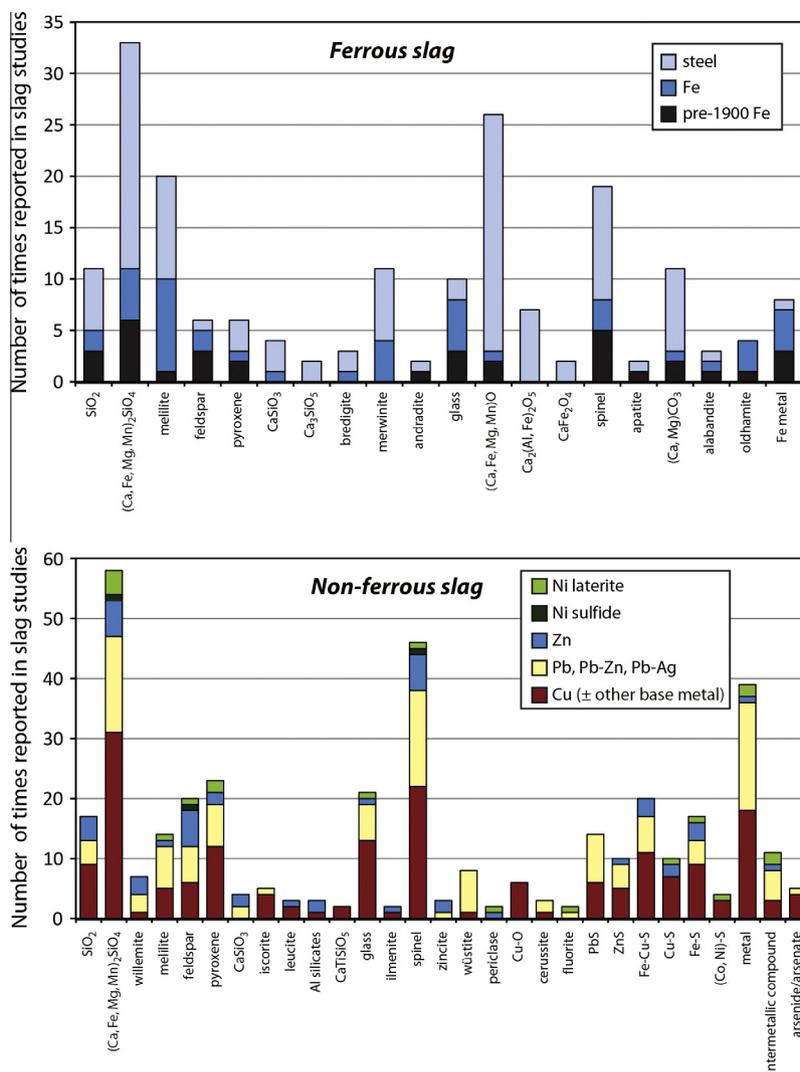
**Fig. 9.** Bulk chemical compositions of slag in weight percent on  $\text{Al}_2\text{O}_3$ - $\text{SiO}_2$ - $\text{CaO}$  (A),  $\text{Al}_2\text{O}_3$ - $\text{SiO}_2$ - $\text{FeO}$  (B), and  $\text{FeO}$ - $\text{SiO}_2$ - $\text{CaO}$  (C) ternary diagrams. Based on slag chemistry, one or two ternaries were chosen to represent the bulk composition of each slag type. The shaded fields on each diagram represent the majority of samples for each slag type (some outlying points were not included in the composition fields). Similar slag compositions were grouped. The average total weight percent represented by the fields or symbols are given in parentheses after the slag type. Phase boundaries and isotherms, in Celsius, from Levin et al. (1964). See Appendix A for references.

individual samples or compiled data from other sources. For example, the chemistry of ferrous slag from 58 active steel mills in the United States was summarized by Proctor et al. (2000). Their published data incorporated into Table 1 include only minimum, maximum, and mean values for Fe slag and two types of steel slag (not individual analyses). Nonetheless, it is obvious from Table 1 that  $\text{CaO}$  and  $\text{SiO}_2$  generally dominate Fe slag with lesser amounts of  $\text{Al}_2\text{O}_3$  and  $\text{MgO}$ . The compositions are shown as shaded fields on the  $\text{Al}_2\text{O}_3$ - $\text{SiO}_2$ - $\text{CaO}$  and  $\text{FeO}$ - $\text{SiO}_2$ - $\text{CaO}$  ternary diagrams in Fig. 9; these ternary systems represent an average of 77% and 75% of the total mass of the samples, respectively. The pre-1900 Fe slags dominate the  $\text{SiO}_2$ -rich end of the field, whereas modern Fe slag from steel-making plants is clustered closer to the  $\text{CaO}$ -rich end of the field. In comparison to Fe slag, steel slags are represented on the  $\text{Al}_2\text{O}_3$ - $\text{SiO}_2$ - $\text{CaO}$  and the  $\text{FeO}$ - $\text{SiO}_2$ - $\text{CaO}$  ternaries in Fig. 9; the latter ternary is more representative because more of the total bulk composition is encompassed such that the field represents an average of 75% of the total mass of the samples, compared to 61% for the  $\text{Al}_2\text{O}_3$ - $\text{SiO}_2$ - $\text{CaO}$  system. Both diagrams illustrate that most steel slag is dominated by  $\text{CaO}$ . Variations in the major-element chemistries among types of steel slag (i.e., BOF, EAF, and ladle slag) are discussed in Yildirim and Prezzi (2011).

The average concentrations of Al, Ca, and Mg for steel and Fe slag are similar and range from 15 to 36 wt.% for  $\text{CaO}$ , from 7 to 14 wt.% for  $\text{Al}_2\text{O}_3$ , and from 7 to 9 wt.% for  $\text{MgO}$  (Table 1). In

contrast, steel slag contains, on average, higher concentrations of Fe (average of 23 wt.%  $\text{FeO}$ ) compared to Fe slag (averages of 1 and 16 wt.%  $\text{FeO}$  for modern and pre-1900 samples) (Table 1). Also, steel slag generally contains lower concentrations of Si (average 17 wt.%  $\text{SiO}_2$ ) compared to Fe slag (35 and 45 wt.%  $\text{SiO}_2$  for modern and pre-1900 slag, respectively). Manganese oxide ( $\text{MnO}$ ) averages 4 wt.% in steel slag compared to 2 wt.% (modern) and 1 wt.% (pre-1900) in Fe slag. The other major elements expressed as oxides include  $\text{K}_2\text{O}$ ,  $\text{Na}_2\text{O}$ , and  $\text{TiO}_2$  and average less than 2 wt.% in ferrous slag (Table 1).

In Fig. 9A, the pre-1900 Fe slag that dominates the  $\text{SiO}_2$ -rich end of the Fe slag field plots within the cristobalite ( $\text{SiO}_2$  above 1470 °C), tridymite ( $\text{SiO}_2$  below 1470 °C), anorthite ( $\text{CaAl}_2\text{Si}_2\text{O}_8$ ), and pseudowollastonite ( $\text{CaSiO}_3$  above ~1125 °C) fields. The primary mineralogy reported for pre-1900 Fe slag in Costagliola et al. (2008), Piatak and Seal (2012a), Severin et al. (2011), and Vivenzio and Farthing (2005) include quartz, cristobalite, and plagioclase ( $(\text{Na,Ca})(\text{Si,Al})_4\text{O}_8$ ), which are all consistent with this phase diagram. Other Ca-rich silicates and aluminosilicates identified were olivine ( $(\text{Ca,Fe})_2\text{SiO}_4$ ), melilite-, and pyroxene-group phases, mullite ( $\text{Al}_6\text{Si}_2\text{O}_{13}$ ), garnet ( $\text{X}_3\text{Y}_2(\text{SiO}_4)_3$ ), and glass (Fig. 10). In addition, Fe and Ti oxides and calcite ( $\text{CaCO}_3$ ), among others, were mentioned. The primary mineralogy of the pre-1900 iron slag is generally consistent with that predicted by the bulk composition based on Fig. 9A.



**Fig. 10.** Number of times primary minerals were identified in each ferrous and nonferrous slag type. Only phases that were identified repeatedly (at least twice) were included in the figure. See [Appendix A](#) for references.

The more Ca-rich steel-making Fe slag mostly plots within the pseudowollastonite and gehlenite ( $\text{Ca}_2\text{Al}_2\text{SiO}_7$ ) fields ([Fig. 9A](#)). Melilites, in particular gehlenite, were the most commonly reported phase in Fe slag that was allowed to cool slowly enough for crystalline phases to form ([Fig. 10](#)). The next most commonly reported silicate phases include Ca and/or Mg silicates (olivine-group, merwinite ( $\text{Ca}_3\text{Mg}(\text{SiO}_4)_2$ ), bredigite ( $\text{Ca}_{14}\text{Mg}_2(\text{SiO}_4)_8$ ), wollastonite ( $\text{CaSiO}_3$ )) and glass ([Fig. 10](#)). Calcium sulfide (oldhamite) and Fe metal were identified in more than one study but are minor to trace in abundance. Like the pre-1900 Fe slag, the bulk composition of the more modern Fe slag in [Fig. 9A](#) may be used to gain insight into chemistry of the primary phases, if slowly cooled, or glass, if quenched.

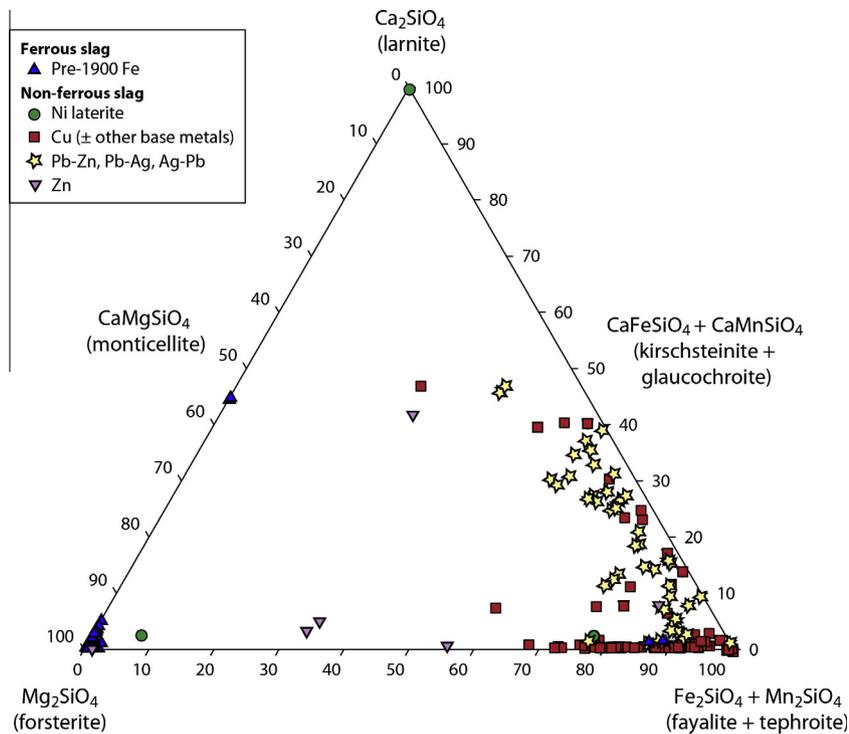
Based on [Fig. 9](#), steel slag samples will be composed mostly of Ca silicate ( $\text{Ca}_2\text{SiO}_4$ , larnite), tri-Ca silicate ( $\text{Ca}_3\text{SiO}_5$ , rankinite), and Ca oxide (CaO, lime) if slags are allowed to cool at a rate that crystalline phases form; if quenched, the slag will be a Ca silicate glass. The most commonly reported primary phase in steel slag studies ([Fig. 10](#) and [Appendix A](#)) is larnite; tri-Ca silicate and Ca oxide were also reported in multiple samples. Aluminum, Fe, and Mg are less abundant and are generally present in Ca silicates that can accommodate these elements, e.g., monticellite ( $\text{CaMgSiO}_4$ ), melilite, and merwinite ([Fig. 10](#)). In addition, Al, Fe, and Mg oxide

phases including spinels and  $\text{SiO}_2$  (quartz or cristobalite) are common in steel slags.

#### 4.1.2. Mineral chemistry

As shown in [Fig. 10](#), the most commonly reported primary phases in ferrous slag are olivine-group phases with the general formula ( $\text{Ca, Fe, Mg, Mn}$ ) $_2\text{SiO}_4$ . Larnite is the most common, followed by monticellite in this chemical group due to the Ca-rich nature of ferrous slag; forsterite ( $\text{Mg}_2\text{SiO}_4$ ), fayalite ( $\text{Fe}_2\text{SiO}_4$ ), and kirschsteinite-glaucocroite ( $\text{CaFeSiO}_4$ – $\text{CaMnSiO}_4$ ) have also documented by more than one study. [Fig. 11](#) illustrates the composition of olivine-group phases based on electron microprobe analysis (EMPA) data (See [Appendix A](#) for references). Although larnite is the most commonly reported composition for ferrous slag olivines (typically based on X-ray diffraction (XRD), limited EMPA data exists for steel and modern Fe slags and therefore no data from these slags are shown in [Fig. 11](#). Historical pre-1900 Fe slag is shown in [Fig. 11](#) and compositions plot near forsterite in the ternary ([Piatak and Seal, 2012a](#)). This particular historical Fe slag contains less Ca than steel and modern Fe slags ([Fig. 9](#)). Therefore, the occurrence of Mg-rich olivines, rather than larnite, is consistent with the bulk chemistry.

The next most commonly reported phases in ferrous slags are oxides [(Ca, Fe, Mg, Mn)O] and melilites. Calcium oxide (CaO),



**Fig. 11.** Olivine compositions (in molar percentage) in the larnite-forsterite-(fayalite + tephroite) ternary diagram for various slag types based on EMPA data. See [Appendix A](#) for references.

MgO, and FeO are reported mostly in steel slag studies; these three oxides occur generally with the same frequency whereas MnO is reported less often. Compositions of melilite reported for Fe slag are between gehlenite and akermanite ( $\text{Ca}_2\text{MgSi}_2\text{O}_7$ ). Sodium, Fe, and Mn are present in melilites in trace (0.5 wt.%) to undetectable amounts and the only trace element reported is Ni with a maximum of 0.63 wt.% NiO (Butler, 1977; Scott et al., 1986; Piatak and Seal, 2012a).

Glass is likely ubiquitous, even if present in only trace amounts, although not always mentioned as a phase in reports. Similar to the bulk chemical compositions of ferrous slag, glass in ferrous slag is usually dominated by the following major elements expressed as oxides:  $\text{SiO}_2$ , CaO,  $\text{Al}_2\text{O}_3$ , and MgO. The concentrations of these elements vary widely based on the few Fe slag studies that report weight percentages in glass (Table 2) (Butler, 1977; Scott et al., 1986; Severin et al., 2011; Piatak and Seal, 2012a) presumably due to a range in the melt compositions, variable cooling histories, and age range from ancient (3rd to 4th century A.D.) to modern. For instance, in slowly cooled slag, the glass will likely be enriched in elements that are not compatible with the crystallizing phases, whereas the glass in rapidly cooled slag will more likely resemble the original melt. In addition to the previously-mentioned major elements in glass, FeO,  $\text{K}_2\text{O}$ , MnO,  $\text{Na}_2\text{O}$ , S, and  $\text{TiO}_2$  are commonly reported at a few weight percent or less in Fe slag; trace elements were not reported or not detected (Table 2).

The few ferrous slag studies that identified pyroxenes are for Fe slag (Butler, 1977; Piatak and Seal, 2012a); the compositions of these pyroxenes are usually Al-rich (with maximum  $\text{Al}_2\text{O}_3$  reaching over 20 wt.%) with Ca commonly greater than Mg with very little Fe (Fig. 12). Trace elements were not reported or were below detection in these pyroxenes. Wollastonite is also reported several times in Fe and steel slag. In addition to silicates and oxides, metal and sulfide phases such as Fe metal and Ca and Mn sulfides (alabandite–oldhamite) are more often or only found in Fe slag as compared to steel slag (Fig. 10).

## 4.2. Non-ferrous slag

### 4.2.1. Bulk chemistry and primary mineralogy

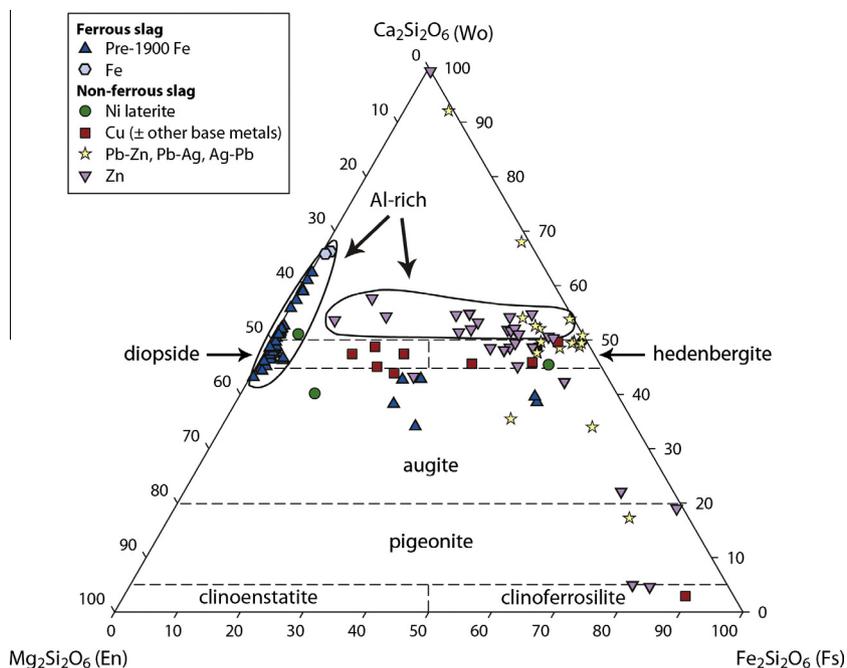
Table 1 includes a summary of non-ferrous slag chemistry from over 30 sources (see Appendix A). In Fig. 9, the bulk compositions of non-ferrous slags from base-metal sulfide ores are illustrated on the  $\text{Al}_2\text{O}_3$ – $\text{SiO}_2$ –FeO and FeO– $\text{SiO}_2$ –CaO ternary diagrams; Ni laterite slag is shown on  $\text{Al}_2\text{O}_3$ – $\text{SiO}_2$ –CaO and FeO– $\text{SiO}_2$ –CaO ternary diagrams. These ternaries generally represent greater than a third of the mass of the various slag samples (the average of the sum of the three components in weight percent for the individual analyses is given in parentheses after each slag type in Fig. 9). There is not one ternary that is representative of 100% of the mass of all samples in a slag type. As such, the ternaries may be used to gain insight into the likely crystalline phases but may not definitively depict all possible phases because of the presence of other components.

The major-element concentrations have similar ranges for non-ferrous slag from base-metal sulfide ores (e.g., Cu, Ni, Pb, and Zn (plus possibly Ag)) (Table 1). In Fig. 9B and C, the fields representing these types of base-metal slags are combined due to their similar compositions. In general,  $\text{SiO}_2$  and FeO are more abundant than CaO and  $\text{Al}_2\text{O}_3$  on these projections. Studies that discussed slags produced from the extraction of Cu, in addition to possibly Pb and Zn, were grouped together as Cu ( $\pm$  base metals) slag in Table 1. In general, non-ferrous slag is more Fe-rich than ferrous slag, in particular Fe slag, and the most Fe-rich non-ferrous samples in Fig. 9C are dominated by Cu and Ni sulfide slag. This observation is consistent with the fact that Fe is the commodity that is being removed from the ferrous material being smelted, whereas for base-metal slags, it is a contaminant that is removed by the slag. Although there is a wide-range in the Si and Ca concentrations for the base-metal slags, the averages expressed as oxides are similar among the various slag types within this group. For example, the averages for  $\text{SiO}_2$  in Table 1 are between 35 and 40 wt.% and the averages for CaO are between 3 and 11 wt.% (excluding Ni

**Table 2**  
Summary of electron microprobe analyses of glass for various slag types. See Appendix A for references that contain EMPA data. Several studies report minimum, maximum, and mean values only; these values were included. Concentrations below detection were not included.

	Fe (n2 = 4)				Ni laterite (n2 = 1)				Cu ± other base metals (n2 = 6)				Pb–Ag, Pb–Zn, Ag–Pb (n2 = 5)				Zn (n2 = 1)				Sn (n2 = 2)			
	Min	Max	Average	n1	Min	Max	Average	n1	Min	Max	Average	n1	Min	Max	Average	n1	Min	Max	Average	n1	Min	Max	Average	n1
wt.%																								
Al <sub>2</sub> O <sub>3</sub>	8.87	34.52	15.43	124	2.92	16.75	10.92	6	0.65	21.22	12.94	108	0.20	13.99	7.56	39	7.48	38.87	21.34	105	9.64	13.42	11.97	7
As <sub>2</sub> O <sub>3</sub>	–	–	–	–	–	–	–	–	0.07	2.99	1.02	8	0.03	0.42	0.18	13	–	–	–	–	–	–	–	–
BaO	0.06	0.66	0.18	109	–	–	–	–	1.30	2.11	1.77	5	0.13	6.52	2.10	14	0.01	0.71	0.12	102	–	–	–	–
CaO	0.31	43.58	15.58	124	9.75	22.70	16.06	6	0.80	32.06	6.91	108	1.01	33.08	10.60	39	0.15	19.68	6.04	105	–	–	–	–
CdO	–	–	–	–	–	–	–	–	0.03	3.36	0.66	10	–	–	–	–	–	–	–	–	–	–	–	–
CoO	–	–	–	–	0.004	0.05	0.02	6	0.005	0.91	0.09	56	–	–	–	–	–	–	–	–	–	–	–	–
Cr <sub>2</sub> O <sub>3</sub>	–	–	–	–	0.15	0.59	0.25	6	0.010	0.36	0.12	18	0.01	0.37	0.12	18	0.01	0.09	0.02	55	–	–	–	–
CuO	–	–	–	–	0.001	0.13	0.04	6	0.02	6.90	0.40	85	0.005	0.15	0.06	15	–	–	–	–	–	–	–	–
FeO	0.06	30.40	3.02	90	7.18	35.94	19.81	6	0.80	63.57	21.83	108	4.36	51.32	19.39	39	0.18	25.02	10.23	105	3.47	6.18	4.69	7
K <sub>2</sub> O	0.33	10.28	2.01	115	0.77	1.77	1.10	6	0.01	10.39	2.54	107	0.03	6.45	2.20	39	0.18	5.48	2.70	105	–	–	–	–
MgO	0.61	26.47	9.51	117	0.17	17.31	4.92	6	0.01	6.51	1.24	99	0.01	2.97	0.74	35	0.22	3.80	1.08	105	0.34	0.34	0.34	1
MnO	0.03	2.08	0.55	110	0.15	1.48	0.60	6	0.01	1.32	0.20	27	0.05	6.31	2.37	32	0.01	0.43	0.12	101	0.02	0.02	0.02	1
Na <sub>2</sub> O	0.07	1.53	0.38	118	0.14	2.17	0.85	6	0.01	15.18	3.04	106	0.10	2.27	0.83	39	0.01	3.54	1.43	104	–	–	–	–
NiO	–	–	–	–	0.004	0.17	0.11	6	–	–	–	–	0.01	0.01	0.01	1	–	–	–	–	–	–	–	–
P <sub>2</sub> O <sub>5</sub>	0.69	0.88	0.79	7	0.02	0.69	0.28	6	0.08	1.48	0.48	15	0.05	1.48	0.52	27	–	–	–	–	–	–	–	–
PbO	–	–	–	–	0.04	0.05	0.04	2	0.001	58.94	2.83	51	0.09	48.92	13.19	36	0.001	0.11	0.03	44	–	–	–	–
SiO <sub>2</sub>	34.35	76.47	52.77	124	35.39	49.20	43.47	6	25.14	76.41	46.65	108	30.77	67.00	40.32	39	42.38	78.23	54.95	105	24.78	31.45	28.35	7
S	0.03	1.84	0.34	76	0.01	0.37	0.17	6	0.01	1.65	0.20	88	0.02	1.20	0.32	30	0.008	0.41	0.10	98	–	–	–	–
SnO <sub>2</sub>	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	10.54	54.89	18.72	7
TiO <sub>2</sub>	0.08	3.13	0.84	117	0.07	0.81	0.48	6	0.03	3.48	0.45	103	0.06	0.75	0.37	34	0.63	4.84	1.29	105	0.20	5.94	1.19	7
ZnO	–	–	–	–	0.01	0.27	0.10	6	0.07	16.21	2.16	94	0.71	9.8	3.79	36	0.003	2.13	0.36	69	–	–	–	–

Abbreviations: n1 = number of analyses, n2 = number of studies for each slag type, each study within a slag type does not necessarily have data for all elements in the table, – = data not available.



**Fig. 12.** Pyroxene compositions (in molar percentage) in the wollastonite (Wo)-clinostatite (En)-clinoferrrosilite (Fs) ternary diagram for various slag types based on EMPA. See Appendix A for references.

laterite slag); Ca is significantly lower in non-ferrous slag compared to ferrous slag. The higher Ca concentrations in ferrous slag are a reflection of the common use of limestone as a flux in the smelting process. As for Al, averages range from 5 to 14 wt.%  $Al_2O_3$  in Table 1 for base-metal slags. The concentrations of S in Cu slags reach almost 7 wt.%, whereas S only reaches about 3 wt.% in other non-ferrous slags. In general, the source of S is sulfide in the ore; for base metal production, roasting releases some or all of the S as  $SO_2$  whereas matte smelting concentrates it in the matte (such as for Cu ores); however, some S ends up in slag. Most iron ores are dominated by magnetite ( $Fe_3O_4$ ), hematite ( $Fe_2O_3$ ), or goethite ( $FeO(OH)$ ), with minimal pyrite ( $FeS_2$ ) or pyrrhotite ( $Fe_{1-x}S$ ), which explains the low S concentrations of ferrous slags. The other major elements expressed as oxides –  $K_2O$ ,  $MgO$ ,  $MnO$ ,  $Na_2O$ , and  $TiO_2$  – all average 4 wt.% or less in the non-ferrous base-metal sulfide slags (Table 1).

The bulk chemical composition gives insight into mineralogy. Base-metal slag fields fall within fields for high temperature  $SiO_2$  (tridymite and cristobalite) and Fe–Ca silicates (olivine group, wollastonite, and pseudowollastonite). Some Fe-rich Cu slags overlap the wüstite ( $FeO$ ) field and some Al-rich Zn slags fall within the mullite field (Fig. 9). The most commonly reported silicates are consistent with these ternary diagrams and include polymorphs of  $SiO_2$  (most typically quartz), olivine group (most frequently fayalite or kirschsteinite), pyroxenes (most typically hedenbergite– $CaFeSi_2O_6$ ), melilite, and silicate glass (Fig. 10). Feldspars (typically plagioclase) and iron oxides are also commonly reported in base-metal slags and include wüstite and the spinel series ( $AB_2O_4$ , where A typically represents a divalent metal ion such as Mg, Fe, Ni, Mn, or Zn and B typically represents a trivalent metal ion such as Al, Fe, or Cr) (Fig. 10).

Slag produced from Ni laterite ore consists mostly of  $SiO_2$ ,  $CaO$ ,  $FeO$ , and  $Al_2O_3$ ; the concentrations of these elements expressed as oxides vary widely because the slags were produced during different stages of smelting (Fig. 9A and C) (Kierczak et al., 2009). The ranges in concentrations for major elements such as Ca, Si, Fe, and Mg generally fall within those reported for other non-ferrous slags. The exception is Ca, which is higher in some of the Ni laterite

slag when compared to most other non-ferrous slags. In Fig. 9, the compositions of the Ni laterite slag samples fall within the fields for Ca silicates, pseudowollastonite and wollastonite, those for the aluminosilicates anorthite, and within the tridymite field. The phases identified as abundant by Kierczak et al. (2009) include larnite, hatrurite ( $Ca_3SiO_5$ ), Ca pyroxenes (diopside ( $CaMgSi_2O_6$ ) – hedenbergite and melilite. Although the ternary diagram cannot be used to predict the phases that formed in this case, the major chemical components of the phases are in agreement, i.e.,  $CaO$  and  $SiO_2$ , with some incorporation of the less abundant oxides of Al, Mg, and Fe.

Tin slag produced between 1650 and 1850 from South Africa consists of mostly Al, Fe, Si and Sn. The concentrations of Sn range from 1.5 to 54 wt.% and average 18 wt.%, which may be a reflection of the inefficiency of the extraction techniques at that time (Chirikure et al., 2010). The range for the other oxides and some trace elements are given in Table 1. The slags are predominantly glass and contain some crystalline phases such as cassiterite ( $SnO_2$ ) and spinels; some Sn slag contains olivine and plagioclase (Heimann et al., 2010; Chirikure et al., 2010).

#### 4.2.2. Mineral chemistry

Similar to ferrous slags, the most commonly reported primary phases in non-ferrous slag are olivine-group phases with the formula  $(Ca, Fe, Mg, Mn)_2SiO_4$  (Fig. 10) (see Appendix A for references). In contrast to ferrous slag, which is Ca-rich, the most frequently reported phase with this formula in non-ferrous slag is fayalite due to the Fe-rich nature of these slags. EMPA data from various studies shown in Fig. 11 indicate that non-ferrous slags commonly contain olivine between kirschsteinite and fayalite in composition, or near the fayalite-end of the forsterite–fayalite join. Olivines in non-ferrous slags also may contain trace elements such as Zn, Ni, and Pb. The concentrations of Zn in olivines from base-metal slags may be a few weight percent Zn, reaching nearly 10 wt.% ZnO in Cu slag from California (Parsons et al., 2001); Zn substitutes for Fe in the crystal structure due their similar ionic radii. The Zn end-member, willemite ( $ZnSiO_4$ ), is also occasionally reported. Nickel and Pb in olivines are less abundant than Zn and

reach almost 2 wt.% NiO in Ni laterite slag (Kierczak et al., 2009) and 0.3 wt.% PbO in Zn slag (Puziewicz et al., 2007). Nickel is a common trace element reported in naturally-occurring olivines with an average of about 0.4 wt.% NiO in upper mantle olivine but concentrations greater than 5 wt.% NiO for some Mg-rich olivines (Sato, 1977; Ishimaru and Arai, 2008).

The next most commonly reported phases in non-ferrous slags are of the spinel group, particularly magnetite. Other spinel-group phases identified include hercynite ( $\text{FeAl}_2\text{O}_4$ ), franklinite ( $\text{ZnFe}_2\text{O}_4$ ), gahnite ( $\text{ZnAl}_2\text{O}_4$ ), and ulvöspinel ( $\text{Fe}_2\text{TiO}_4$ ). Trace elements reported in spinels include Co and Cu (up to 5 wt.% CoO and 4 wt.% CuO in Cu–Co slag; Vítková et al., 2010), Pb (up to 1 wt.% PbO in Pb–Ag slag; Ettler et al., 2009a), and Sn (up to 36 wt.% Sn in Sn slag; Heimann et al., 2010).

The compositions of pyroxene in non-ferrous slags based on EMPA are illustrated in Fig. 12. Many analyses cluster near hedenbergite and diopside; those that fall just outside these fields towards wollastonite usually contain high concentrations of Al. End-member wollastonite is also reported, but less commonly than other compositions shown in Fig. 12. Similar to olivines, Zn is likely the most common trace element found in pyroxenes with concentrations reaching nearly 8 wt.% ZnO in Zn slag from Poland (Puziewicz et al., 2007). Other trace elements in pyroxenes include Co in Cu–Co slag from Zambia that contain approximately 1 wt.% CoO (Vítková et al., 2010) and Pb–Ag medieval slag from Czech Republic that contains up to 7 wt.% PbO (Ettler et al., 2009a).

The composition of melilite group phases varies considerably based on EMPA data and may be composed of mixed proportions of the end-members akermanite, Fe akermanite, gehlenite, and hardystonite ( $\text{Ca}_2\text{ZnSi}_2\text{O}_7$ ). The predominant cation besides Si is Ca; some Na may be present, usually 3 wt.%  $\text{Na}_2\text{O}$  or less. Iron reaches approximately 20 wt.% FeO, whereas Mg only reaches approximately 10 wt.% MgO in non-ferrous slags. Manganese may be present, usually at 1 wt.% MnO or less. Navarro et al. (2008) reports Ba- and Fe-rich melilites with a little over 20 wt.% BaO and FeO in base-metal slag from Spain. End-member hardystonite has been reported in Zn slag in the United States and Poland (Puziewicz et al., 2007; Piatak and Seal, 2010). Besides Zn, Pb has been reported in melilites in numerous studies, at times in significant concentrations (over 50 wt.% PbO in Zn slag; Puziewicz et al., 2007). Sulfur has been reported in melilites at concentrations around 1 wt.% S in both non-ferrous (Navarro et al., 2008) and ferrous slag (Piatak and Seal, 2012a). Cadmium and Ni have also been found in trace amounts.

The range in concentrations of major oxides and trace elements in the glass for various non-ferrous slag types are given in Table 2. The composition of glass in non-ferrous slags, like the bulk composition, is dominated by Si (up to 78 wt.%  $\text{SiO}_2$ ), Fe (up to 64 wt.% FeO), Al (up to 39 wt.%  $\text{Al}_2\text{O}_3$ ), and Ca (up to 33 wt.% CaO) (Table 2). Other major elements expressed as oxides such as BaO,  $\text{K}_2\text{O}$ , MgO, MnO,  $\text{Na}_2\text{O}$ , when present, average a few weight percent oxide or less (Table 2). The average S content of glass in non-ferrous slag is between 0.1 and 0.3 wt.% S, with maximum values reaching 1.6 wt.% S (Table 2). In general, compared to glass in ferrous slag, glass in non-ferrous slag is Fe-rich and Mg-poor, and at times, Ca-poor. Glass can be the host for some trace elements such as Pb, Sn, and Zn, with concentrations that may exceed 10 wt.%, especially in late-stage interstitial glass. For example, Pb concentrations in glass reach over 50 wt.% PbO in base-metal slag from California (Parsons et al., 2001), Sn reaches an average value of 43 wt.% in Sn slag from South Africa (Heimann et al., 2010), and Zn reaches 16 wt.% ZnO in Cu slag from Namibia (Ettler et al., 2009b). Other trace elements such as As, Cd, and Cu are found in concentrations up to 3.0 wt.%  $\text{As}_2\text{O}_3$ , 3.4 wt.% CdO, and 6.9 wt.% CuO in Cu and base-metal slags (Table 2) (Parsons et al., 2001; Ettler et al., 2009b; Vítková et al., 2010).

Native metals and intermetallic compounds, especially Cu, Fe, and Pb, are commonly reported in non-ferrous slags as well as sulfides of Cu, Fe, Pb, and Zn (Fig. 10). These phases may also contain a suite of other trace elements such as Ag, As, Au, Co, Cd, Ni, Sn, and Sb.

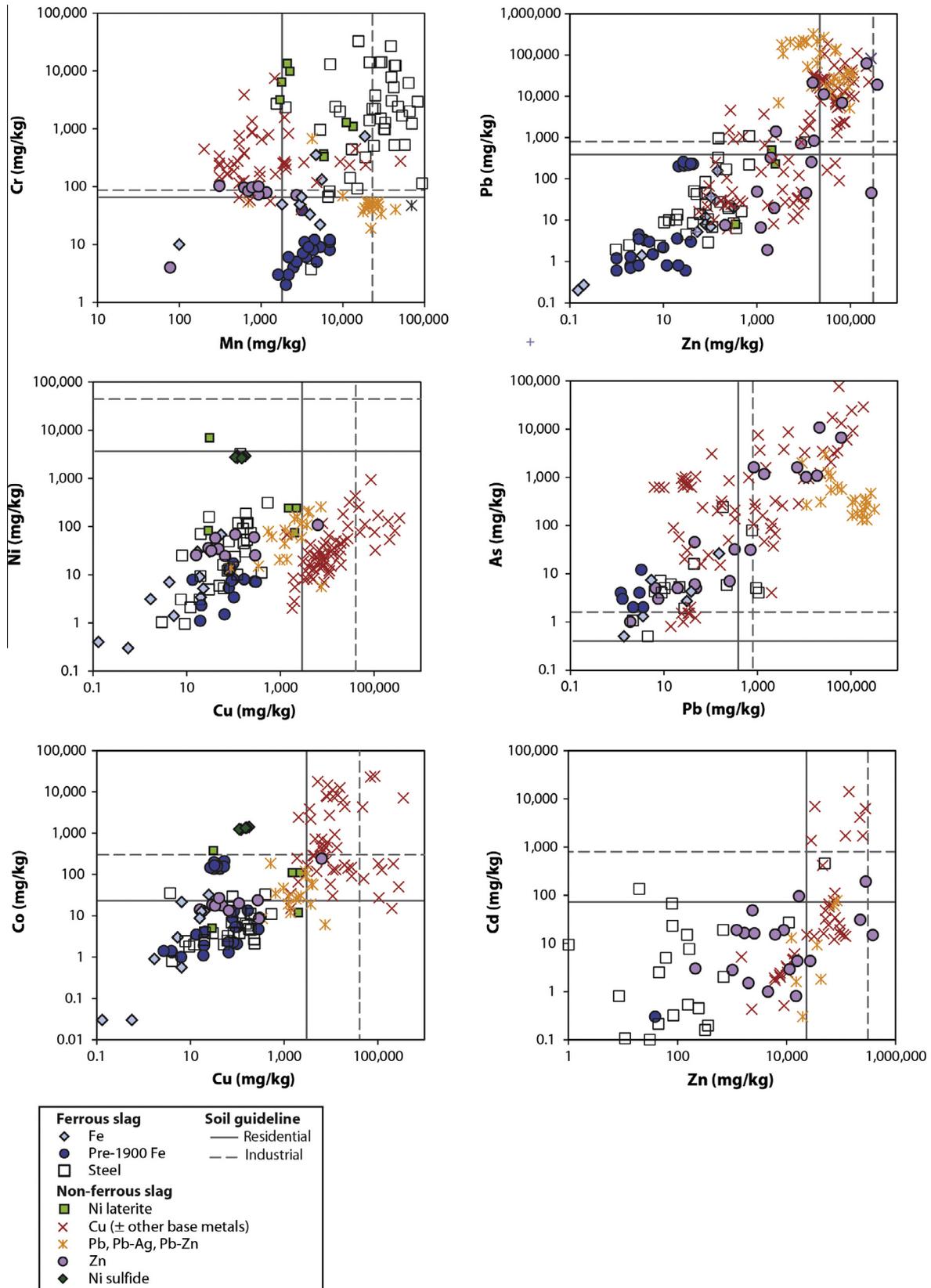
## 5. Environmental aspects

### 5.1. Comparison with environmental guidelines

The concentrations of some elements in the various slag types exceed generic environmental guidelines based on multiple exposure pathways. Although slags are not directly comparable to soils, USEPA preliminary soil screening levels for contaminants at potentially hazardous waste sites (USEPA, 2010) were chosen for comparison for several reasons: (1) in the United States, the screening levels are used as a first-look guideline to compare element concentrations in waste materials found at the numerous hazardous waste sites that contain slag; (2) the guidelines are a useful screening tool such that if element concentrations in slag fall below the level, they are likely not an environmental issue, whereas, values that exceed guidelines warrant further study and may require remediation; and (3) guidelines can provide insight into options for slag reuse. Slags are surface materials that are present in both industrial and residential settings and reuse of land containing slag is commonplace. Therefore, the potential risk to human health from slag needs to be understood and comparison to generic screening guidelines is a useful first step in guiding management decisions.

For the major elements, guideline exceedances include Al and Fe. The concentrations of Al in some Zn and Fe slag samples are greater than the USEPA soil screening level for residential soils of 7.7 wt.% Al (equivalent to 14.5 wt.%  $\text{Al}_2\text{O}_3$ ); only a few steel, Cu, Ni laterite, and historical Sn slag samples exceed the guideline (USEPA, 2010). The concentrations of Fe in most non-ferrous slag samples and many steel slag samples exceed the residential soil screening level of 5.5 wt.% Fe (equivalent to 7.1 wt.% FeO) (USEPA, 2010).

The concentrations of trace elements in the various slag types are illustrated in Fig. 13 with the ranges in concentrations and average values given in Table 1. In Fig. 13, the concentrations of the elements are compared to soil screening levels for residential use (shown as solid lines) and for industrial use (shown as dashed lines); criteria are from USEPA for all elements except Cr, which is a Canadian guideline (CCME, 2007; USEPA, 2010). The elements that are present in concentrations that exceed these environmental criteria in ferrous slags are As, Cr, and Mn, and locally Co and Pb (Table 3). As shown in Fig. 13, the concentrations of Cr in nearly all steel slag samples and a few Fe slag samples exceed both the residential and industrial soil screening guidelines. Steel slag concentrations reach 32,700 mg/kg Cr and Fe slag concentrations reach 9580 mg/kg Cr (not shown in Fig. 13 because Mn not reported for this sample) (Table 1). In Fig. 13, nearly all ferrous slag samples exceed the Mn residential guideline; some steel slag samples also exceed the industrial one. The average concentrations of Mn in steel, and pre-1900 and modern Fe slags are between 1 and 4 wt.% MnO in Table 1. The concentrations of Co and Pb in a few steel slag samples also exceed the guidelines (Fig. 13, Table 1). It is important to point out that all slag samples exceed the As residential soil guideline of 0.39 mg/kg and most exceed the industrial guideline of 1.6 mg/kg (USEPA, 2010); for comparison, the average concentration of As in soil in the United States is 7.2 mg/kg, which would also exceed the guidelines (Shacklette and Boergen, 1984). Other elements such as Al and Cr also have environmental soil guidelines that are not significantly higher than the average for



**Fig. 13.** Concentrations of elements in various slag types. Residential use (solid line) and industrial use (dashed line) soil screening levels are shown. Guidelines are from USEPA (2010) for all elements except Cr, which are Canadian guidelines (CCME, 2007). See Appendix A for references. Concentrations below the level of detection were not included.

soils in the United States. In addition for some elements, the maximum concentrations found in soils throughout the United States would exceed guidelines, in particular in mineralized areas.

For non-ferrous slag samples, trace element concentrations vary based on ore type. For example, slag from Cu sulfide and Ni laterite ores contain high Cr contents averaging 455 and 4484 mg/kg,

**Table 3**  
Elements that may be of environmental concern based on bulk chemistry by slag type.

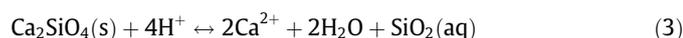
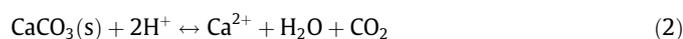
	Steel	Fe	Ni laterite	Ni sulfide	Cu	Pb	Zn
As	**	**			**	**	**
Ba						**	
Cd					*		
Co				**	**	**	
Cr	**	*	**		**		**
Cu					**		
Mn	**	**	**			**	
Ni			*	*			
Pb					**	**	**
Zn					**	**	**

Symbols: \* = concentrations occasionally exceed criteria, \*\* = concentrations commonly exceed criteria, criteria are USEPA soil screening levels for all elements except for Cr, which was from CCME (USEPA, 2010; CCME, 2007).

respectively; the industrial soil screening level is 87 mg/kg (CCME, 2007). In addition to Cr, Ni laterite slag contains Mn (maximum of 1.72 wt.% MnO), and locally Ni (maximum of 6907 mg/kg Ni), in concentrations that exceed the residential environmental guidelines (Fig. 13, Tables 1 and 2). Copper slag commonly contains As, Co, Cu, Pb, and Zn, and locally Cd that exceeds one or both of the soil screening levels (Fig. 13). The concentrations of Ni and Zn in Pb slag samples are generally comparable to those found in Cu slag whereas the concentrations of As, Cd, Co, and Cu are usually lower (Fig. 13). In contrast, the concentrations of Mn in Pb slag generally exceed those in Cu slag (Fig. 13, Table 1). Elements that commonly exceed environmental soil screening levels in Pb slag include: As, Ba, Co, Mn, Pb, and Zn (Table 3). Zinc slag contains comparable amounts of Ni, Pb, and Zn to Cu slag but the As, Cd, Co, and Cu contents do not reach the maximum values found in Cu slag. Elements that commonly exceed environmental soil screening levels in Zn slag include As, Cr, Pb, and Zn (Table 3). Nickel sulfide slag contains Co in concentrations that exceed the industrial soil screening level. In summary, Pb and Zn (and As) can be found in significant concentrations as compared to environmental soil guidelines in Cu, Pb, and Zn slags, whereas Cd, Co, Cr, and Cu are anomalously high in Cu slag, Mn is anomalously high in Pb slag, and Ni is anomalously high in Ni sulfide slag compared to the other non-ferrous slag types (Fig. 13). The highest average concentration of Cu is found in Cu slag, Ni in Ni slags (both laterite and sulfide), Pb in Pb slag, and Zn in Zn slag (Table 1).

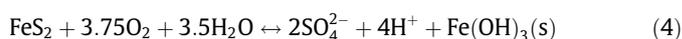
## 5.2. Secondary phases

Secondary weathering products formed from slag are an indication of the reactivity of the material and may be a means of releasing trace elements, acidity, or alkalinity into the environment. Secondary phases occur as surficial coatings or encrustations, infilled vesicles, and along grain or crystal edges. Published studies have characterized secondary phases formed by natural and simulated weathering and have used these as an indicator of the reactivity of various slags. The secondary phases that form from slag are the weathering products of the primary phases after interaction with air or water. Dissolution of the Ca oxides, carbonates, and silicates in ferrous slags produce an alkaline leachate, which then either evaporates or interacts with the slag to produce secondary phases. Examples of these acid-buffering reactions for Ca carbonate (calcite) and Ca silicate (larnite), phases commonly found in ferrous slag, are as follows:



Secondary carbonates, phosphates, and hydroxides of Ca, Fe, and Mg, among others, were reported on steel slag in a study by Svirenko et al. (2003). In addition, Fe oxides (goethite, hematite) and Ca sulfate (gypsum) have been reported in numerous studies as secondary phases on steel and Fe slag (Svirenko et al., 2003; Cravotta, 2005; Costagliola et al., 2008; Navarro et al., 2010; Piatak and Seal, 2012a).

In contrast, the list of secondary phases associated with non-ferrous slag is much more extensive and does not include Ca or Mg carbonates due to the generally near neutral to slightly acidic condition of the waters (i.e., surface water, groundwater, or precipitation) that result from interaction with non-ferrous slags. Acidity can be generated by the dissolution of certain sulfides in the slag such as pyrite according to the following reaction:



The most commonly reported phases include Fe oxides and sulfates of Ba, Ca, Cu, Fe, Mg, Pb, and Zn. For both ferrous and non-ferrous slag, secondary phases may host potentially toxic trace elements such as Cd, Cr, and Pb. During rainfall events, soluble secondary phases may dissolve and release trace elements, alkaline earth elements, and sulfate to surrounding waters. Also, the formation of some phases such as ferric hydroxide and Al hydroxide from the hydrolysis of  $\text{Fe}^{3+}$  and  $\text{Al}^{3+}$  may generate acid, thereby accelerating weathering reactions. An example of these types of hydrolysis reactions is shown by the following reaction:



A study by Bril et al. (2008) found the Cu, Pb, and Zn sulfate phases brochantite ( $\text{Cu}_4(\text{SO}_4)(\text{OH})_6$ ), anglesite ( $\text{PbSO}_4$ ), and bianchite ( $(\text{Zn,Fe})(\text{SO}_4) \cdot 6\text{H}_2\text{O}$ ), respectively, as secondary phases associated with Zn slag in Poland. Additionally, a recent study by Kierczak et al. (2013) reported langite ( $\text{Cu}_4(\text{SO}_4)(\text{OH})_6$ ) and malachite ( $\text{Cu}_2(\text{CO}_3)(\text{OH})_2$ ) as secondary phases associated with Cu slag in Poland. The occurrence of these phases indicates that trace element-bearing primary phases (e.g., zincite (ZnO), willemite, melilite, spinel, sulfides, metals, glass) are releasing metals at sufficient concentrations during weathering to result in the precipitation of secondary phases.

## 5.3. Acid–base accounting

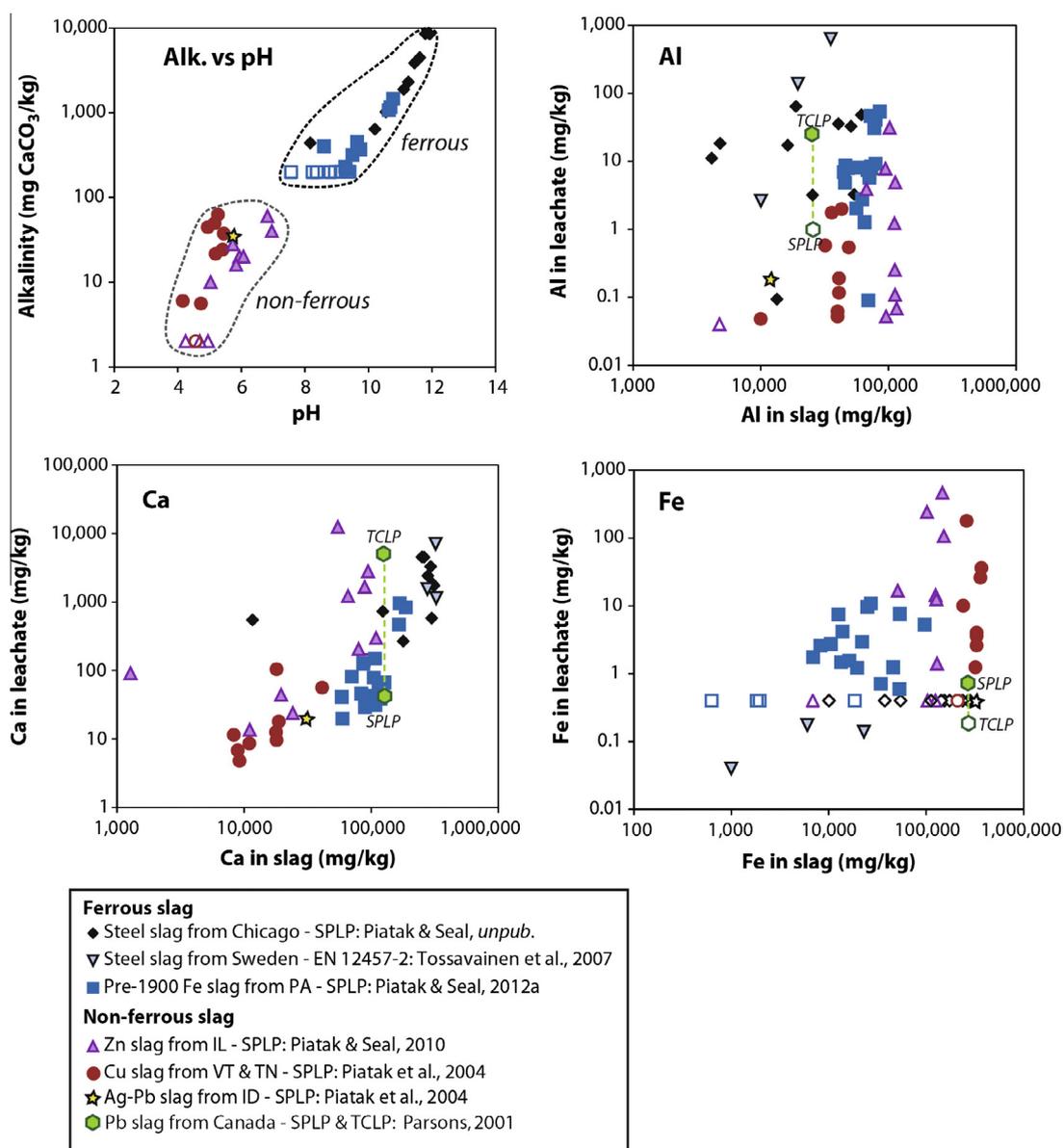
Acid–base accounting is a means to quantify the amount of acid or alkalinity that may be released into the environment from a material. Mineralogical differences among the various slag types may result in very different acid-generating and acid-neutralizing potentials. Acid–base accounting evaluates the difference between the neutralization potential and acid-generating potential and is usually determined based on laboratory static tests. The acid-generating potential is commonly based on the S content and speciation to represent acid-generating Fe-sulfide minerals (e.g., reaction (4)) and the neutralization potential is based on the amount of acid-neutralizing minerals present (e.g., reactions (2) and (3)) determined by acid digestion of the sample and subsequent neutralization (Jambor, 2003). Although quantified using bulk geochemical laboratory methods, the acid-generating or neutralizing potential of a material is a function of its mineralogical composition.

Many of the crystalline phases found in ferrous slag samples such as Ca silicates (e.g. larnite), carbonates, and Ca oxide have positive acid neutralization potentials, which greatly outweigh the acid-generating potentials of any trace sulfides present. For example, Ziemkiewicz and Skousen (1999) found that steel slags from the eastern United States have neutralization potentials between 450 and 780 kg  $\text{CaCO}_3/\text{t}$  and when reacted with deionized

**Table 4**  
Summary of slag types and leaching methods for references that were compared for this paper.

Slag type	Location	Leaching method <sup>a</sup>	Modification to method	References
Steel	Chicago area, Illinois	SPLP	2 mm size fraction	Piatak and Seal (unpublished)
Steel and Fe	Throughout United States	TCLP	None	Proctor et al. (2000)
Steelmaking companies, Sweden		EN 12457-2	None	Tossavainen et al. (2007)
Steel	Mingo Junction, Ohio	TCLP	3.2 mm size fraction	Ziemkiewicz and Skousen (1999)
Pre-1900 Fe	Hopewell Furnace, Pennsylvania	SPLP	2 mm size fraction	Piatak and Seal (2012a)
Cu	Vermont copper belt and Ducktown, Tennessee	SPLP	2 mm size fraction, 1-min. agitation, 24 h. contact	Piatak et al. (2004)
Cu	Penn Mine, California	TCLP SPLP	None	Parsons et al. (2001)
Cu and Pb-Cu	Tsumeb smelter, Namibia	TCLP EN 12457-2	0.1 mm size fraction	Ettler et al. (2009b)
Pb	Belledune smelter, New Brunswick	TCLP SPLP	None	Parsons (2001)
Pb-Zn	Clayton smelter, Idaho	SPLP	2 mm size fraction, 1-min. agitation, 24 h. contact	Piatak et al. (2004)
Zn	Hegeler smelter, Illinois	SPLP	2 mm size fraction	Piatak and Seal (2010)

<sup>a</sup> See text for an explanation of the leaching methods.



**Fig. 14.** Chemistry of slag leachates compared to leachate pH or the concentrations of elements in the slag based on bulk chemical analysis. Concentrations are in mg/kg for both leachate and bulk chemistry; leachate concentrations were multiplied by the liquid-to-solid ratio to convert mg/L to mg/kg. Open symbols indicate concentrations not detected at the detection limit of the method. Modifications to standardized leachate procedures include: SPLP performed on <2 mm size fractions and a 1-minute agitation and 24 h contact time used for the SPLP on the VT, TN, and ID slags.

water produced leachate with a pH of approximately 12. In addition, Wendling et al. (2010) reported an acid neutralization capacity of 130 kg CaCO<sub>3</sub>/t (2.6 mol H<sup>+</sup>/kg) for steel slag. In contrast to ferrous slag, the sulfides, especially those that contain Fe, in non-ferrous base-metal slags from processing sulfide ores may generate acid upon weathering. These slags may also contain some acid-neutralizing phases such as olivines and pyroxenes; however, their relatively slow dissolution rates inhibit their neutralization contribution (Jambor, 2003). For example, base-metal slag in Spain from processing sulfide ores was found to generate acid with negative net neutralization potentials that average between approximately –90 and –170 kg CaCO<sub>3</sub>/t (Álvarez-Valero et al., 2008) and acidic

paste pH values between 3.1 and 5.0 (Lottermoser, 2005). In contrast to slags produced solely from sulfide ores, Zn slag produced in Belgium from smelting a combination of Zn-silicate, Zn-carbonate, and Zn-sulfide ores was found to neutralize acid with positive neutralization potentials of 30–56 kg CaCO<sub>3</sub>/t (i.e., 594–1122 mmol/kg; Ganne et al., 2006).

5.4. Leachate chemistry

The constituents released from slag during weathering and interaction with surface and ground waters may have deleterious effects on the environment. The leaching behaviors of the various

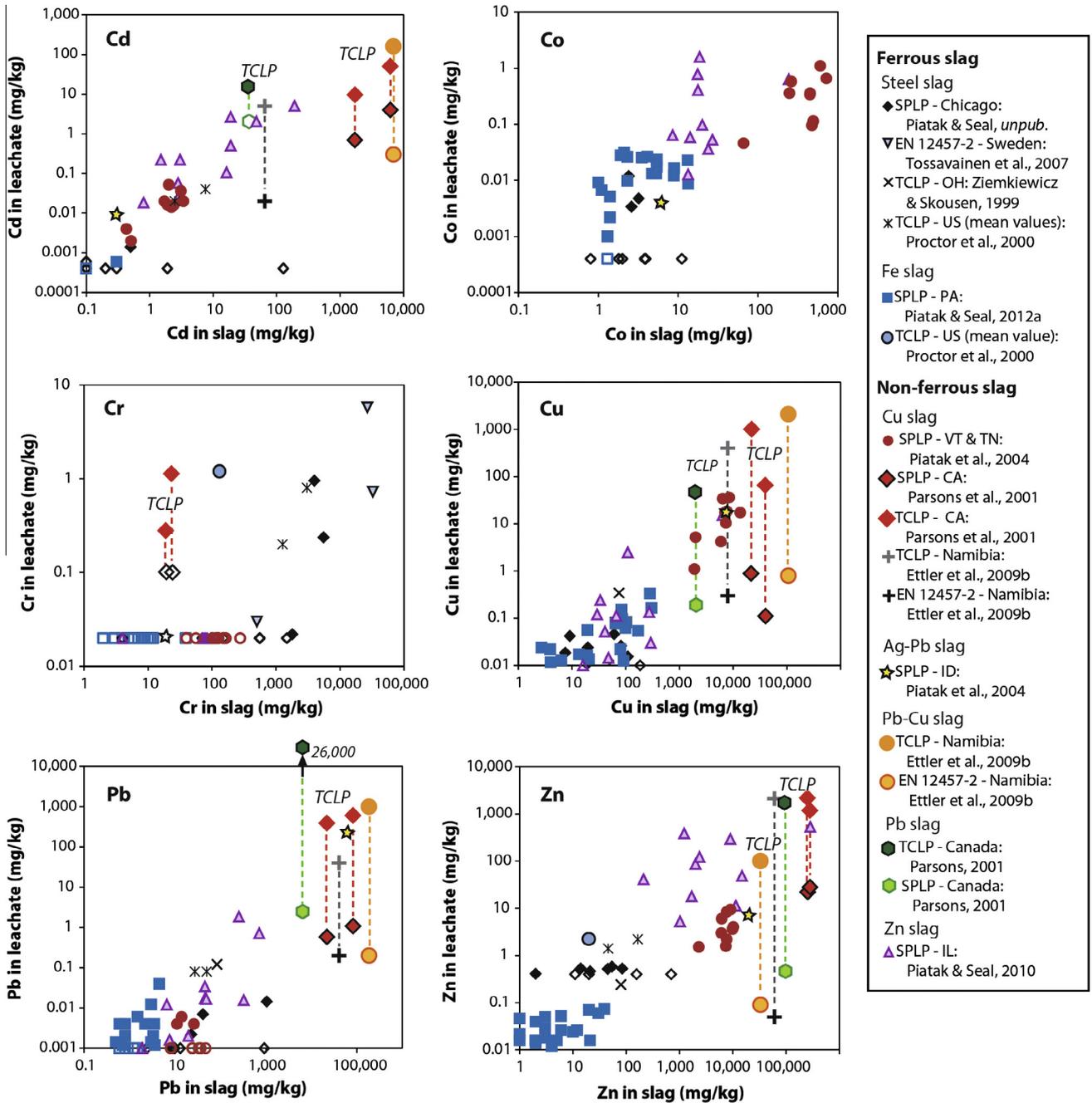


Fig. 15. Chemistry of slag leachates compared to concentrations of elements in the slag based on bulk chemical analysis. Concentrations are in mg/kg for both leachate and bulk chemistry; leachate concentrations were multiplied by the liquid-to-solid ratio to convert mg/L to mg/kg. Open symbols indicate concentrations below the detection limit of the method. Modifications to standardized leachate procedures include: SPLP performed on <2 mm size fractions for all samples except those from PA; a 1-minute agitation and 24 h contact time used for the SPLP on the ID, TN, and VT, slags; <0.1 mm in diameter material used for the slag from Namibia; < 3.2 mm in diameter material used for the slag from OH. The mean values are plotted for two types of steel slag (n = 17 & 45) and blast furnace iron slag (n = 11) collected from throughout the US (see Proctor et al., 2000 for details). Samples connected by dashed lines are the same material leached by two different methods.

slag types are unique and strongly controlled by their bulk chemistry and mineralogy. For this review, leachate results from several studies were examined to gain insight into the general leachate signatures of each slag type; Table 4 lists the references containing leachate chemistry. Results from three standardized single batch extraction test methods were compared: synthetic precipitation leaching procedure (SPLP), toxicity characteristic leaching procedure (TCLP), and EN-12457-2 (see Section 3.1.3 for an explanation of methods and references). The findings indicate that some slags release certain elements more than others and that the leachate concentrations of only some elements correlate to their bulk chemical concentrations in the slags. The results from these studies cannot all be compared directly to each other because each protocol has different leaching parameters. Despite this, general comparisons can be made and insight can be gained into how slags react in the various leachants and which elements are consistently released in the highest or lowest proportions. For comparison purposes, the element concentrations in the leachates were converted to an amount released from the solid by multiplying leachate concentrations (mg/L) by the liquid-to-solid ratio of the leachate method and are reported as milligrams per kilogram (mg/kg). Piatak and Seal (2012b) also summarized the leachate signatures by slag type from these studies and compared results to slag drainage chemistry.

Figs. 14 and 15 illustrate the composition of the leachates compared to the bulk compositions of the slags; some modifications to the standardized procedures are noted in the figure captions. Overall, the leachate signatures of the ferrous slags were very different from that of the non-ferrous slags. In Fig. 14, the pH and alkalinity from non-static pH leach tests were significantly higher for ferrous slag leachate than those for non-ferrous slag leachate from base metal extraction of mostly sulfidic ores. The alkaline leachate produced from ferrous slags is likely the consequence of the dissolution of Ca silicates, oxides, and/or carbonates (e.g., reactions (2) and (3)). The acidic pH of some leachates generated from non-ferrous slags may result from the oxidation of sulfide minerals (e.g., reaction (4)).

The dominant major cation released from the ferrous slag samples was Ca, followed by Si with lesser amounts of Al, Mg, and Fe (Fig. 14). Leaching of the abundant Ca silicates and oxides and glass found in these slags is the likely source of the Ca and Si (De Windt et al., 2011). Similar to ferrous slag, Ca and Si were the dominant cations released from non-ferrous slag. In contrast to ferrous slag, Fe was also a major constituent of the non-ferrous slag leachates due to its greater abundance in this slag type, and was commonly found in higher concentrations than either Al or Mg (Fig. 14). As for most minor and trace elements, ferrous slag commonly released low concentrations using all three types of leaching tests mostly due to the low abundance of many of these elements in the bulk slag samples (Fig. 15). Chromium, and occasionally Mn, is found in anomalously high concentrations in ferrous slag leachates when compared to most other slag types, which commonly released Cr below the level of detection (Fig. 15). The highest leachate concentrations of As, Cd, Co, Pb, and Zn are for the non-ferrous slags (Fig. 15). In general for equivalent leaching tests, the highest amounts of Cu are leached from Cu slags, the highest amounts of Pb are leached from Pb slag, and the highest amounts of Co, Cd, and Zn are leached from Cu and Zn slags.

For many of the minor and trace elements, the concentrations in the leachate generally correlate with the concentrations in the bulk slag sample when comparing the various slag types (Fig. 15). For example, Cu slags contain and leach the greatest amounts of Cu compared to the other slag types. In contrast, for some samples within a given study, the leachate concentrations and bulk chemical composition do not correlate or a correlation cannot be determined due to low concentrations. Low concentrations of some

elements in the leachates may indicate that the elements are hosted by phases that are relatively insoluble under the leaching conditions. For example, the concentrations of Zn in steel slag from Chicago vary from 2 to 100 mg/kg but the concentrations of Zn in the leachates are consistently near or below the detection limit of 0.4 mg/kg (Fig. 15). In another example, leachate composition and bulk chemistry for the Zn slag from Hegeler, Illinois, do not correlate for many trace elements, which may reflect the varying leachate pH in the non-static pH leaching tests and the partitioning of elements in phases with wide-ranging solubilities including sulfides, oxides, and silicates (Fig. 15).

The general correlation between bulk chemical composition and leachate chemistry is also shown for the major element Ca. In contrast to Ca, Al and Fe concentrations in leachates do not correlate well with the bulk concentration of these elements in the slag (Fig. 14). These elements may be hosted by phases that react differently to the leaching conditions and the dissolved concentrations of these elements are likely controlled by the precipitation of secondary Al- or Fe-oxyhydroxides (Parsons, 2001; Ettler et al., 2002; Navarro et al., 2008; De Windt et al., 2011).

Overall, there are many types of leaching tests and the protocols may influence the concentrations and relative proportions of the elements that are released. For example, the TCLP method uses acetic acid or acetate buffer as the leaching solution, which has been shown to leach higher amounts of some trace elements compared to tests run side-by-side that used a leaching solution that did not include acetic acid (Fig. 15) (Parsons et al., 2001; Ettler et al., 2009b). This was likely due to the lower pH of the buffered TCLP solution and enhanced extraction by acetic acid (Parsons et al., 2001; Ettler et al., 2009b). The maximum amounts of Cd, Cr, Cu, Pb, and Zn for both ferrous and non-ferrous slag types were released when acetic acid was used in the extraction solution (Fig. 15, TCLP protocol). Other factors that influence the release of metals are particle sizes, the proportion of amorphous versus crystalline phases in the slag sample, among many others (Johnson et al., 1982; Robbins et al., 1983; Tossavainen et al., 2007; Vítková et al., 2011).

## 6. Case studies

### 6.1. Ferrous slag

With respect to the environmental aspects of slag, there are more published studies on non-ferrous slag than on ferrous slag. Most ferrous slag studies focus on physical characterization and applications of slag as a by-product (See Section 6). Due to the presence of Ca silicates, carbonates, and oxides, ferrous slag is commonly alkaline and has significant acid-neutralizing capacity (see reactions (2) and (3)), which in some applications is a favorable attribute (Cravotta, 2005). Ferrous slag also generally contains lower concentrations of many trace elements as compared to non-ferrous slag. As discussed previously, the elements most likely to be of environmental concern in ferrous slag include As, Cr, Mn, and rarely Co (Fig. 13). The release of these trace elements from the slag can be assessed under natural and simulated conditions. Trace elements are potentially leached into nearby waters and are found in residential soils where slags are used for construction purposes or from windblown smelter dust. In the United States, extensive deposits of Fe and steel slag do exist in some areas, especially in steel manufacturing locations where Fe smelting has occurred on a large scale since the Industrial Revolution. Also, hundreds of smaller historical iron furnaces left slag dumps across the United States. Although environmental effect studies on ferrous slag have been conducted in other countries (i.e., Svirenko et al., 2003; Navarro et al., 2010), only case studies in the United States on historical Fe slag and modern steel-making slag are highlighted here.

### 6.1.1. Historical iron slag

Very few studies have been conducted on the environmental aspects of historical Fe slag (e.g., Costagliola et al., 2008; Rizza and Farthing (abstract), 2007; Vivenzio and Farthing, 2005 (abstract), Piatak and Seal, 2012a). Studies on modern steel and blast-furnace Fe slags are more numerous but not directly applicable because of the influence of technological innovations on slag chemistry and mineralogy. Piatak and Seal (2012a) recently studied historical Fe slag at the Hopewell National Historical Site in Berks and Chester counties, Pennsylvania, USA. This work focused on characterizing the chemistry, mineralogy, and environmental behavior of the slag. In addition, the chemistry of groundwater, surface water, stream sediment, and soil at and near Hopewell was discussed in Sloto and Reif (2011). The Hopewell slag was produced from magnetite ores (skarn deposits) in 18th- and 19th-century iron smelters, mostly cold-blast charcoal-fired but also anthracite- and coke-fired. Overall, the slag is enriched in some trace elements but only a few of these exceed environmental guidelines (i.e., As, Fe, and Mn). These findings are consistent with those discussed previously on the bulk chemistry of ferrous slags (Table 3, Fig. 13). In addition, soils in the vicinity of the furnace contain higher concentrations of Cr, Cu, Fe, Pb, and Zn than unimpacted background soils likely due to air emissions from the furnace and/or contamination by slag; concentrations do not exceed local guidelines. The limited environmental impact of the slag is substantiated by SPLP leaching tests that found secondary drinking water guideline exceedances of Al, Fe, and Mn and ecosystem toxicity guideline exceedances of Al and Cu in some extract solutions (Figs. 14 and 15). In general, the compositions of the groundwater and surface water reported in Sloto and Reif (2011) were similar to leachate extract compositions validating the use of the leaching tests as a proxy for natural weathering.

### 6.1.2. Steel and iron slag

As stated earlier, studies on modern steel and Fe slag deposits are more numerous than on historical Fe slag but most focus on characterization and reuse. Some environmental characterization has been conducted on steel slags in the Chicago area near the border of Indiana and Illinois, USA. The geochemistry of waters and sediment in contact with some of these extensive steel slag deposits has been discussed in Bayless and Schulz (2003) and Bayless et al. (1998, 2004). These studies found that drainage from slag deposits along the shore of Lake Michigan contains elevated levels of trace elements and has affected the mineralogy of underlying sediments. Bayless et al. (1998) noted that Cr, Pb, and Zn are highest in groundwater from immediately below the slag deposits. Bayless and Schulz (2003) reported enhanced chemical weathering of silicate minerals in sediment as well as secondary precipitation of calcite, gypsum, and other minerals as a result of interaction with the hyperalkaline slag drainage; both of these may impact ground-water flow patterns. Bayless et al. (2004) used Sr and B isotopes to identify and delineate slag-affected sediments that have been transported into Lake Michigan. These studies indicate that drainage from slag deposits in the Chicago area is having an effect on nearby sediment and waters but the environmental consequence is not clear. Leaching tests recently conducted by Piatak and Seal (unpublished) on slag from this area revealed that only Al repeatedly exceeded environmental guidelines in SPLP extract solutions; Al commonly exceeded secondary drinking water guidelines and often exceeded aquatic ecosystem guidelines (Fig. 14). Roadcap and Kelly (1994) investigated shallow aquifer ground water beneath fill that is mostly steel slag in the Chicago area. The authors documented extremely alkaline pH (>12) and high concentrations of Fe and ammonia, as well as high levels of Ba, Cr, Mn, and moderate levels of other elements including As, Hg, and Pb that may or may not have originated in the slag. A

follow-up study examined ground water associated with slag and secondary weathering products (Roadcap et al., 2005). The authors again found extremely alkaline pH (>12) waters as well as secondary Fe and Mn oxides and Fe, Mn, and Zn sulfides in the ground water system. Also, where ground water reached the surface, calcite precipitated that contained significant concentrations of some trace elements including Cd, Cr, Cu, Pb, Ni, and Zn indicating the mobility of these trace elements in the system (Roadcap et al., 2005). These studies show that ferrous slag deposits can have a deleterious impact on surface- and ground-water through the release of trace elements and hyperalkaline drainage.

### 6.2. Non-ferrous slag

Studies of the environmental characterization of non-ferrous slags are more numerous than for ferrous slags, partially because these slags generally contain significant concentrations of trace elements. Also, the ore from which base metals are extracted is commonly sulfide-rich; therefore, the slag also may contain residual sulfide phases, which can generate acid and release trace elements upon weathering. The trace elements that may be of concern include: As, Cd, Co, Cu, Cr, Mn, Ni, Pb, and Zn, and less commonly Ba (Fig. 13). Leaching tests and the weathering behavior of slags discussed below for each slag type can be used to understand the release of these potentially toxic metals into the environment. Also, slag or slag-containing soils or sediments can be transported by water or wind, extending the area of contamination. Case studies highlighted in this section focus on the most common types of non-ferrous slag, those produced mostly from the extraction of base metals from sulfide ores, with the last study focusing on Ni slag produced from non-sulfidic ores.

#### 6.2.1. Copper slag

Parsons et al. (2001) used field and laboratory studies to characterize the composition, mineralogy, and reactivity of various Cu slag types found at the abandoned Penn Mine in California. Historical Cu smelting at the Penn Mine (1865–1919) generated approximately 200,000 m<sup>3</sup> of slag, which was dumped along the banks of the Mokelumne River. The slag deposits are now flooded for 6–8 months each year by a reservoir used for drinking water and irrigation. Slags are glassy to crystalline, and range in size from coarse sand to large (0.6 × 0.7 × 1.5 m), tub-shaped casts. The ranges in total metal and metalloid concentrations of the slag samples are as follows: 0.0004–0.92 wt.% As; 0.0014–1.4 wt.% Cd; 0.18–6.4 wt.% Cu; 0.02–11 wt.% Pb; and 3.2–28 wt.% Zn. On the basis of mineralogy, slags are characterized by four main types: fayalite-rich, glassy, willemite-rich, and sulfide-rich. X-ray diffraction and SEM analyses identified weathering-related secondary minerals on the slag, including hydrous ferric oxides, barite (BaSO<sub>4</sub>), cerussite (PbCO<sub>3</sub>), chalcantite (CuSO<sub>4</sub>·5H<sub>2</sub>O), hydrozincite (Zn<sub>5</sub>(CO<sub>3</sub>)<sub>2</sub>(OH)<sub>6</sub>), and malachite (Cu<sub>2</sub>CO<sub>3</sub>(OH)<sub>2</sub>). The results of TCLP and SPLP leach tests on two willemite-rich samples showed that both Cd and Pb exceeded the regulatory guidelines in the TCLP leachates, but that the SPLP leached much lower metal concentrations (Fig. 15). Analyses of water samples collected within the flooded slag dump and adjacent reservoir revealed elevated metal concentrations near the slag deposits during reservoir drawdown, reflecting the influence of slag dump pore waters on the lake water chemistry.

Field and laboratory data were used to develop geochemical models with the program EQ3/6 to simulate irreversible mass-transfer between the Penn Mine slags and reservoir waters (Wolery, 1992; Wolery and Daveler, 1992). These models included kinetic rate laws for sulfide oxidation and dissolution of silicates, oxides, and glass. Calculations demonstrated that the main processes controlling dissolved metal concentrations in the slag dump pore

waters are (1) dissolution of fayalite, willemite, and glass; (2) sulfide oxidation; and (3) secondary mineral precipitation. The results of this study show that base-metal slags, especially those from historical smelters, are not chemically inert wastes, and can result in environmental contamination through leaching of potentially toxic elements. When properly constrained through careful field and laboratory studies, the geochemical modeling techniques demonstrated in Parsons et al. (2001) can be used to develop remediation strategies for slags at both historical and modern smelting sites.

The release of trace elements from slag resulting from the extraction of Cu from sulfide ores (volcanic-associated massive sulfide deposits) in the Vermont Copper Belt was reported by Piatak et al. (2004). Granulated Cu slag from the Ducktown mining district in Tennessee and Pb–Ag slag from the Clayton smelter in Idaho were also examined in the study. The smelters in Vermont were in operation from the mid-1800s to the early 1900s, similar to the Clayton smelter operations, but earlier than the operation that produced the granulated slag from Ducktown. The Cu slags from Vermont may pose an environmental risk based on results of simulated weathering leaching tests that produced leachates containing concentrations of Cu and Zn in excess of aquatic life guidelines (Fig. 15). Also, secondary minerals, including copper sulfates, on the slag deposits provide evidence that the material is reactive and weathering naturally. The study also highlighted that most potentially toxic trace elements (i.e., As, Co, Cu, Pb) are hosted in relatively reactive glass, sulfides, and intermetallic compounds. In contrast, some trace elements such as Zn are hosted in the relatively less reactive crystalline silicates and oxides. These findings are generally consistent with an aquatic ecosystem assessment of one of the mine sites, the Ely Copper Mine, from which Cu slag was collected. The assessment by Seal et al. (2010) indicated Cu as the main stressor in the aquatic environment downstream of the slag dump. Albeit, the weathering of other mine wastes at the site also releases significant amounts of Cu and, likely, in higher amounts than that released from the slag.

#### 6.2.2. Zinc slag

Similar to the Cu slag in Vermont, Zn slag from the Hegeler smelter in Illinois may pose an environmental risk (Piatak and Seal, 2010). This slag was produced from the processing of sulfide ore (likely Mississippi Valley type Pb–Zn deposits) in the early- to mid-1900s. Leachate concentrations from all samples exceeded aquatic life guidelines for Zn and Cd, whereas guidelines for Cu and Pb are only locally exceeded. The surface and ground water compositions at the site are consistent with the leachate results in that natural site waters exceeded the drinking water and acute and chronic aquatic life guidelines for both Zn and Cd. Also, natural weathering is reflected in secondary phases including a Zn sulfate on the surface of slags. According to this case study, elements of potential concern in the Zn slag are Cd, Cu, Zn, and Pb. The results of leaching tests are not completely consistent with findings based on bulk chemical composition for Zn slag (Table 3 and Fig. 15), which suggest that bulk chemistry is not the only aspect of the slag that needs to be examined. The partitioning of potentially toxic trace elements among various phases and their relative reactivity and leachability is essential to understanding the environmental behavior of the slag. In these samples, the partitioning of Zn among the phases in the slag was dependent on the overall bulk concentration of Zn: Zn was hosted mainly in spinel and silicate glass in Zn-rich samples, whereas Zn was hosted mainly in sulfides in samples with lower bulk Zn concentrations. The host phase of the Zn affected the leaching of this trace element with spinel being less reactive than the sulfides.

In addition to the release of potentially deleterious trace elements into nearby waters, soils in the vicinity of smelters can contain high concentrations of some trace elements. Residential soils in

towns neighboring the Hegeler zinc smelter site occasionally contained concentrations of Co, Cu, Fe, and Pb that exceeded USEPA soils screening levels for human contact; the highest concentration of some trace elements were routinely found in residential roadway soil (Weston Solutions, Inc., 2007). Slag used as fill material for private drives, roadways, and railways presumably contaminated the soils. The human health risk from exposure to the trace elements present in the residential soils was found to be low when considering incidental ingestions, dermal absorption, and inhalation of dusts (Weston Solutions, Inc., 2007). This is in contrast to a site in La Oroya, Peru, where the same exposure and dose–response modeling conducted for contaminated soils in the vicinity of a smelter, which recovers Cu, Pb, Zn, and other byproducts, indicated that Pb in soil was a serious health problem (Reuer et al., 2012). At the smelter site in Peru, and many other smelter sites throughout the world, the contamination of soils is likely predominantly from point-source stack and fugitive emissions from the smelter. However, Reuer et al. (2012) did suggest at least one of the soils containing high concentrations of trace elements was impacted by the advection of fine-grained material from nearby slag heaps.

#### 6.2.3. Lead–zinc slag

There have been numerous environmental studies on Pb–Zn slag from smelting sulfide ores (mostly from polymetallic vein deposits) in the Přebram mining district, Czech Republic (Ettler et al., 2000, 2001a, 2001b, 2002, 2003, 2004, 2005, 2009a). The smelting operations occurred from the Middle Ages to modern times. Studies have focused on mineralogical and chemical characterization and numerous leaching tests. Extraction solutions including organic-rich acidic solutions, deionized water, and hyperalkaline buffer solutions were used in leaching tests to gain insight into the behavior of slag under various conditions. Studies found that significant amounts of trace elements were released during the leaching with organic-rich solutions but they were subsequently bound to, or trapped within, newly precipitated phases (Ettler et al., 2004, 2005). These results have implications with respect to covering slag waste piles with soil and encouraging vegetation to grow. Also, oxidizing near-neutral conditions helped to limit the mobility of some elements such as Pb and As through precipitation and absorption processes (Ettler et al., 2003). In contrast, alkaline solutions that simulate slag use in concrete resulted in the release of Pb (Ettler et al., 2001b). In Ettler et al. (2002), the partitioning of trace elements among various phases and the relative stabilities of these phases in various solutions were also examined. Overall, the release of trace elements during leaching tests suggested that some environmental risk is associated with these slag deposits, but understanding their behavior under field conditions may help to inform decisions concerning slag reuse and remediation.

#### 6.2.4. Nickel slag

The mineralogy and weathering of Ni slag produced from smelting of lateritic ores in southwestern Poland were summarized by Kierczak et al. (2009). Overall, the phases and textures of these slags are similar to those produced during the smelting of sulfide-rich ore, but with lower amounts of sulfides present in the laterite slags. Because gypsum was added as a flux during the smelting of the lateritic ores, the reducing conditions of the furnace produced sulfides of Fe, Ni, and Cu. According to Kierczak et al. (2009), sulfides and intermetallic compounds are the most important hosts of Cu, Ni, and Sn. In addition, Cr occurs as chromite and in diopside, Ni is found in olivine, and Zn in melilite. Despite being exposed to atmospheric conditions for 30–80 years, the slag remains mostly unaltered, but does contain some indications of weathering including vesicles with corrosion embayments, weathering-induced margins on slag surfaces, and the dissolution of sulfides. The authors noted the relative reactivity of sulfides, glass,

and crystalline silicates and oxides. They concluded that the potential environmental risk of the slag is limited due to the immobility of Cr, Ni, and Zn in relatively stable silicates and oxides, and the entrapment of small inclusions of more reactive sulfide and metallic alloys that contain Cu, Ni, and Sn within the stable silicates and oxides and slightly less stable silicate glass.

## 7. Slag as a resource

The majority of slag used for construction and environmental applications is from Fe and steel production. Iron and steel slag is considered a commodity and its supply and demand is summarized yearly by the United States Geological Survey (USGS). Also, several associations focus on promoting the use of slag, predominantly ferrous, such as the National Slag Association (NSA), the European Slag Association (EUROSLAG), and the Australasian Slag Association (ASA). Slag production and reuse is a global business. In 2011, an estimated 260 to 330 million tonnes (Mt) of Fe slag and an estimated 150–220 Mt of steel slag were produced in the world; the United States produced approximately 8–9 Mt of Fe slag and approximately 9–13 Mt of steel slag in 2009 (Van Oss, 2013). By comparison, there are relatively limited data on the quantities of non-ferrous slag produced each year. According to the NSA (2009), non-ferrous slags constitute approximately 12% of total slag production. Based on ferrous slag estimates from Van Oss (2013), this would imply that approximately 50–66 Mt of non-ferrous slag were produced worldwide that year. According to Gorai et al. (2003), approximately 24.6 Mt of slag is generated each year from world production of Cu. When it comes to reuse, ferrous slag is generally considered for use in construction and environmental applications, whereas non-ferrous slag is the focus of research on reprocessing, especially historical dump material, for secondary metal recovery.

### 7.1. Construction materials

The majority of ferrous slag, and some non-ferrous slag, is used for construction purposes. As briefly discussed previously, the method used to cool the slag affects the physical properties of the material and influences how it is used. Although commonly vesicular, the hard and dense nature of air-cooled Fe and steel slags make them suitable for construction aggregate. Table 5, detailing ferrous slag use in the United States in 2011, indicates that most air-cooled Fe slag is used in ready-mixed concrete, asphaltic concrete, road bases and surfaces, and fills; air-cooled steel slag has similar uses which the exception of ready-mixed concrete (Van Oss, 2013). A study by Maslehuddin et al. (2003) suggested that using steel slag aggregate in concrete produces a more durable product compared to using limestone aggregate. Most steel slag and about one-half of the Fe slag is air-cooled in the United States (Van Oss, 2013). Air-cooled slag also is used for roofing, mineral wool, as well some environmental applications discussed below.

The glassy nature of granulated Fe slag gives the material hydraulic cementitious properties, which increase in strength if combined with free lime during hydration. Hadjsadok et al. (2012) found improved durability as well as less deterioration in sulfate-rich solutions for concrete and mortar containing granulated Fe slag. In 2010, approximately one-half of Fe slag was granulated and 95% of that material was used as cementitious material (Table 5) (Van Oss, 2013). In contrast to the United States, the majority (over two-thirds) of slag produced in Europe in 2004 was granulated; similar to the United States, the most common use of the material is in cement production (EUROSLAG, 2006). The average price per tonne for granulated Fe slag is significantly higher than for the other types of ferrous slag. In Table 5, the average price per tonne of granulated Fe slag in 2011 is \$74,

**Table 5**  
Use of iron and steel slag in the United States in 2011 (from Van Oss, 2013).

	Blast furnace iron <sup>a</sup>		Steel furnace
	Air cooled	Granulated	
<i>Percentage</i>			
Ready-mixed concrete	11.1	–	–
Concrete products	5.1	–	–
Asphaltic concrete	19.3	–	12.1
Road bases and surfaces	38.7	4.5	46.8
Fill	13.3	–	19.3
Cementitious material	–	95.0	–
Clinker raw material	0.8	–	4.7
Misc. <sup>b</sup>	6.6	0.5	–
Other	5.1	–	17.1
Average price per tonne	\$7.14	\$74.25	\$5.18
Million tonnes sold or used	5.5	2.5	7.3

<sup>a</sup> Pelletized slag quantities are very small and not included.

<sup>b</sup> Includes railroad ballast, roofing, mineral wool, or soil conditioner.

compared to \$7 for air-cooled Fe slag; approximately 70% of the value of total slag sales is from granulated material (Van Oss, 2013). Pelletized slag usually contains abundant vesicles making it an ideal lightweight aggregate. If pelletized slag is finely ground, it may also be used as a cementitious material. This type of slag is the least abundant type, usually accounting for less than one percent of the Fe slag produced in the United States (Van Oss, 2013).

Non-ferrous slag also has construction reuse applications but according to the United States Department of Transportation (FHWA, 1997), most non-ferrous slag produced is disposed of in waste dumps. These slags are commonly air cooled but can also be quenched influencing how the material can be reused. Zinc slag has been used to manufacture ceramic tile and used as an aggregate in asphalt. Copper and Ni slags have been used as aggregate in asphalt, as fill, in railway ballast materials, in roofing material, and as cementitious material (granulated) (FHWA, 1997). Recent research has revealed that the addition of small amounts of Cu slag to cement actually improved its burnability (Ali et al., 2013). Gorai et al. (2003) gave a brief review of the use of Cu slag and also listed the following uses: as an abrasive for cutting tools, in pavement and concrete, as flooring tiles, and in colored glass, among others.

The use of some slag types, in particular from non-ferrous smelters, in construction materials has been shown to release trace elements into the environment. As previously discussed, Zn slag from the Hegeler smelter in Illinois that was used as fill for private drives, roadways and railways has contaminated residential soils with some trace elements (Weston Solutions, Inc., 2007). Laboratory and pilot scale leaching tests on road materials, mostly cements, containing Zn and Pb slag indicated that Zn and Pb are released during simulated environmental conditions and only a limited amount of some slag types can be incorporated into these materials (Barna et al., 2004; De Angelis and Medici, 2012). In contrast, laboratory leaching tests on asphalt mixes containing EAF steel slag did not release environmental significant amounts of Cr or other trace elements suggesting these materials are appropriate substitutes (Milačić et al., 2011).

### 7.2. Environmental applications

The use of ferrous slag in environmental applications has been increasing with recent studies on the removal of phosphorus, nitrogen, or trace elements from solution and controlling unwanted industrial emissions. Numerous studies discuss the effectiveness of using steel slag to remove P from wastewater or agricultural runoff (Baker et al., 1998; Drizo et al., 2002, 2006; Weber et al., 2007; Bowden et al., 2009; Barca et al., 2012); another study highlighted the removal of nitrogen in constructed wetlands using steel slag (Sun et al., 2009). In addition, emission of nitrogen

oxides, which may increase levels of ozone, form acid rain, and acidify aquatic ecosystems, can be reduced by the addition of steel slag into cement kilns used to produce clinker by lowering the firing temperature (Srivastava et al., 2005).

Ferrous slag is also used as an acid-neutralizing agent (Gahan et al., 2009) for treating acid-mine drainage resulting from coal and base-metal operations (Cravotta, 2005; Simmons et al., 2002; Ziemkiewicz and Skousen, 1999). Ferrous slags have high neutralization potentials from the dissolution of Ca silicates, oxides, and carbonates (see reactions (2) and (3)), which increases alkalinity and pH. In Ziemkiewicz and Skousen (1999), the authors suggested allowing rainfall or runoff to interact with steel slag, producing an alkaline drainage that is then allowed to infiltrate directly into an acidic waste piles or is mixed with acid-mine drainage. Another study by Simmons et al. (2002) revealed that a leach bed constructed of steel slag was effectively neutralizing acidic drainage at a coal mine site. Cravotta (2005) conducted laboratory experiments allowing acid-mine drainage to interact with steel slag and reported that the slag effectively neutralized the acidic waters. Additionally, laboratory studies indicated that steel slag effectively neutralized and adsorbed Cu from synthetic acidic drainage water (Wendling et al., 2010).

Research has also focused on the use of steel slag to remove trace elements from water. A few studies investigated the removal of As or U from wastewaters, mine effluent, and synthetic solutions (Blowes et al., 2005; Kwon et al., 2008; Hanski et al., 2007; Oh et al., 2012). Another application is using steel slag to reduce carcinogenic Cr(VI) to less soluble and less toxic Cr (III) in contaminated groundwater or in synthetic solutions (Ochola and Moo-Young, 2004; Hanski and Kankaala, 2009). In addition, Dimitrova (2002) experimented with using granulated Fe slag to remove Pb from solution, which is applicable to decontaminating Pb-bearing industrial wastewaters.

Ferrous slag has also been used as a soil conditioner, fertilizer, or soil liming material. Some applications of this type are included in the “other” category in Table 5. Calcium, Fe, and Mg in ferrous slag can be plant nutrients, although their availability may be influenced by the simultaneous uptake of Si (Anderson, 1991). Slag may also help stabilize the soil and the basicity may increase soil pH. In addition, some trace elements (i.e., Cu, Mn, Zn) in the slag can provide micronutrients to plants and animals. Lopez Gomez et al. (1999) discussed the preparation of fertilizers from steel slag and its influence on the composition of soil and grass and the economic benefits. Anderson (1991) examined the benefits of Ca silicate slag applications to soil and leaf nutrients in sugarcane. Ali et al. (2008) found that silicate Fe slag from steelmaking increased rice productivity when applied to a wetland paddy field; the amount of methane emitted from the field was also reduced. Negim et al. (2010) experimented with using steel slag as an additive to Cu-contaminated soils and the effect on bean plant growth. Chang et al. (2013) reported a decrease in bioaccessible Cd in acidic industrial-contaminated soils amended with iron (BFS) slag. Another study conducted by Qiu et al. (2012) reported successful metal attenuation and a reduction in metal bioavailability after adding steel slag to acidic metal-rich (Cd, Cu, Pb, and Zn) soils from a mining-influenced area. Toxicity testing on leachate from Fe and steel slag using algae and bacteria suggested that the material is potentially suitable for soil amendments, but may require mixing with other media to reduce the leachate pH prior to use (Wendling et al., 2012, 2013).

### 7.3. Secondary metal recovery

The reprocessing of slag for secondary metal recovery at both ferrous and non-ferrous smelters is common practice. The production of steel usually involves the reprocessing of furnace slag to recover additional iron compounds; the recovered material

is used within the steel plant as blast furnace feed or for the production of Fe metal (Fig. 2) (FHWA, 1997). Non-ferrous slag may also be reprocessed at the smelter to enhance metal recovery (Fig. 4). In addition to immediate reprocessing, an increase in the demand and value of some metals has led to research on determining the most effective means to recover metals from historical non-ferrous slag dumps that commonly contain significant concentrations of some metals. For example, Sn slag from northern South Africa (Rooiberg Valley, Limpopo) produced between 1650 and 1850 contains up to 54 wt.% Sn (Chirikure et al., 2010). Also, Pb–Ag slag from a 14th century smelter in the Příbram district, Czech Republic, contains up to 32 wt.% Pb (Ettler et al., 2009a). In some areas, the metal targeted for secondary recovery in the slag may be different than the metal targeted during the initial processing of the ore. For example in the Zambian Copperbelt, historical Cu slag produced beginning in 1931 has been reprocessed for recovery of Co at a modern smelter (Vítková et al., 2010).

The optimal reprocessing techniques for recovering metals from slags are the subject of numerous studies. Reprocessing of slag may involve crushing, grinding, magnetic separation, flotation, roasting, and leaching in various combinations. Secondary metal recovery from base-metal slags has been researched using various extraction solutions including the following: ferric chloride (Anand et al., 1980), acidic ferric sulfate or ammonia–ammonium carbonate solutions (Shelley, 1975), sulfuric acid (Shibayama et al., 2010), subsequent leaches with sulfuric acid and sodium chlorate (Yang et al., 2010), high pressure oxidative acid leaching (Li et al., 2009), nitric acid or ammonia solutions (Tshiongo et al., 2010), and aqueous sulfur dioxide (Gbor et al., 2000, 2006). In addition to leaching, Rao and Nayak (1992) experimented with using flotation processing to recover Cu (and lesser amounts of Co and Ni) from Cu slag. These studies all focus on recovery of trace elements such as As, Cu, Co, Ni, Pb, and Zn. Ferrous slag studies are less numerous and involve recovering Cr and V from steel slag by additional smelting (Park et al., 1994). Another study used magnetic separation and gravity methods to recovery Cr and Ni from stainless steel slag (Lopez et al., 1997). Sánchez and Sudbury (2013) discussed recovering Mo and Cu in Cu slag and V in steel slag as well as utilizing Fe separated from slag to use in the iron and steel industry and SiO<sub>2</sub> in ceramics and glass wool fabrication. The recovery of metal from non-ferrous and ferrous slag may be a means of not only generating revenue, but also reducing the environmental impacts of slag by removing potentially hazardous elements and diminishing the overall volume of smelter waste.

## 8. Conclusions

Interest in slag has been increasing steadily and because large volumes, on the order of 400 Mt or more, are produced worldwide annually, there is a need to understand the potential environmental impacts of this material and its role as a valuable resource. This chapter reviewed over 150 published studies on slag. Because of variable melt compositions and furnace conditions, slags have a range in bulk chemistry, mineralogy, chemical composition of phases, and leachate chemistry. Summarizing these characteristics by slag type from a variety of locations allowed us to make generalizations that are useful when considering the environmental aspects of slag. For instance, ferrous slag commonly has acid-neutralizing capacity and does not readily release environmentally significant amounts of most trace elements making it an attractive resource for construction purposes and in treating acid-mine drainage, among other uses. In contrast, non-ferrous slag may generate acid and release slag-type-specific trace elements when weathered and therefore is more commonly dumped in waste piles, but also has the potential to be reprocessed for secondary metal recovery. As the global population grows and technology advances, it is likely

that slag will continue to be a valuable resource for reuse and recycling and a source of contamination: understanding its nature will only become increasingly more important.

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### Appendix A. Summary of slag characterization references and type of data from each that was used in this paper

References	Slag type	Chemistry	Leachate	Methods	Mineralogy	Sec. min.	EMPA
Ali et al. (2013)	Cu	x		x	x		
Altepeter and James (1992)	Zn		x				
Álvarez-Valero et al. (2008)	Base metals (Cu, Pb, Zn)	x		x	x	x	
Álvarez-Valero et al. (2009)	Base metals (Cu, Pb, Zn)		x	x	x		x
Barca et al. (2012)	Steel	x		x			
Barna et al. (2004)	Pb, Zn	x		x			
Bäverman et al. (1997)	Steel	x	x				
Bayless and Schulz (2003)	Fe, steel			x			
Bayless et al. (1998)	Fe, steel			x			
Bosso and Enzweiler (2008)	Pb	x		x	x		
Bril et al. (2008)	Zn		x	x	x	x	
Butler (1977)	Fe	x		x	x		x
CDM Fed Programs Corp. (1993)	Base metals		x				
Chaudhuri and Newesely (1993)	Pb–Zn	x		x	x		x
Chaurand et al. (2006)	Steel	x					
Chaurand et al. (2007)	Steel	x					
Chirikure et al. (2010)	Sn	x		x	x		x
Costagliola et al. (2008)	Base metals (pyrite, Cu–Pb–Zn, Ag), Fe			x	x		
Cravotta (2005)	Fe	x			x		
De Andrade Lima and Bernardez (2011)	Pb	x	x	x	x		
De Angelis and Medici (2012)	Pb–Zn	x					
De Windt et al. (2011)	Steel	x	x	x	x		
Douglas and Zerbino (1986)	Fe	x		x	x		
Douglas et al. (2012)	Steel	x		x	x		
Drizo et al. (2002)	Steel	x					
Drizo et al. (2006)	Steel	x					
Ettler et al. (2000)	Pb–Zn			x	x		x
Ettler et al. (2001a)	Pb–Zn			x	x		x
Ettler et al. (2001b)	Pb–Zn		x	x			
Ettler et al. (2002)	Pb–Zn		x	x	x		x
Ettler et al. (2003)	Pb–Ag, Ag–Pb, Pb, Pb–Zn	x	x	x			
Ettler et al. (2004)	Pb–Ag, Ag–Pb, Pb, Pb–Zn	x	x	x			
Ettler et al. (2005)	Pb–Zn		x	x			
Ettler et al. (2009a)	Pb–Ag–Zn	x		x	x		x
Ettler et al. (2009b)	Cu–Pb, Cu	x	x	x	x		x
Ettler et al. (2012)	Cu			x			
EUROSLAG (2003)	Fe	x					
Fällman and Hartlén (1994)	Steel	x	x	x			
FHWA (1997)	Steel, Cu, P, Ni, Pb	x					
Gahan et al. (2009)	Steel	x		x	x		
Ganne et al. (2006)	Zn		x	x	x		
Gbor et al. (2000)	Ni	x	x	x	x		
Gee et al. (1997)	Pb			x	x	x	
Heimann et al. (2010)	Sn			x			x
Ivanov (2000)	Fe, steel, Cu, Pb				x		

(continued on next page)

## Appendix A (continued)

References	Slag type	Chemistry	Leachate	Methods	Mineralogy	Sec. min.	EMPA
Johnson et al. (1982)	Cu		x	x			
Kierczak et al. (2009)	Ni	x		x	x		x
Kierczak and Pietranik (2011)	Cu	x		x	x		
Kierczak et al. (2013)	Cu			x	x	x	
Kourounis et al. (2007)	Steel	x					
Kucha et al. (1996)	Zn–Pb	x	x	x	x		x
Lagos and Luraschi (1997)	Cu		x	x			
Leonard et al. (1977)	Cu, Pb		x				
Lewis (1982)	Fe	x			x		
Lottermoser (2002)	Base metals (Cu, Cu–Zn, Ag–Pb)	x		x	x	x	x
Lottermoser (2005)	Pyrite, base metals	x		x	x	x	
Mahé-Le Carlier et al. (2000)	Fe, base metals (Ag, Pb, Cu)	x		x			
Manasse et al. (2001)	Cu	x		x	x		x
Manz and Castro (1997)	Ag, Pb, Zn, Cu		x	x			
Matthes (1980)	Cu			x			
May and Peterson (1991)	Pb		x				
Milačić et al. (2011)	Steel	x		x	x		
Morrison and Gulson (2007)	Pb–Zn		x	x			
Morrison Knudsen Corp. (1992)	Pb		x				
Muhmood et al. (2009)	Fe, steel	x					
Narayan (1995)	Fe			x			
Navarro et al. (2008)	Ag–Pb	x	x	x	x	x	x
Navarro et al. (2010)	Steel	x		x	x		
Nelson (1993)	Base metal		x				
Oh et al. (2012)	Steel	x		x			
Parsons et al. (2001)	Cu–Zn	x	x	x	x		x
Partymiller (1992)	Pb		x				
Pérez-López et al. (2008)	Base metals (Cu, Pb, Zn)		x	x			
Pérez-López et al. (2010)	Base metals (Cu, Pb, Zn)	x		x			
Piatak et al. (2004)	Cu, Pb–Ag	x	x	x	x	x	x
Piatak and Seal (2010)	Zn	x	x	x	x	x	x
Piatak and Seal (2012a)	Pre-1900 Fe	x	x	x	x		x
Piatak and Seal (2014)	Steel	x	x	x	x		
Proctor et al. (2000)	Fe, steel	x	x	x			
Puziewicz et al. (2007)	Zn	x		x	x		x
Rai et al. (2002)	Ferro-Mn	x		x	x		
Rizza and Farthing (2007)	Fe			x			
Roadcap et al. (2005)	Steel	x					
Robbins et al. (1983)	Pb, Cu		x	x			
Rosado et al. (2008)	Base metals (Cu, Pb, Zn)			x	x		
Sáez et al. (2003)	Cu	x		x	x		x
Scheinert et al. (2009)	Ag–Pb–Zn–Cu			x			
Scott et al. (1986)	Fe	x		x	x		x
Seigneur et al. (2007)	Pb		x	x	x	x	
Seigneur et al. (2008)	Pb		x	x			
Severin et al. (2011)	Fe	x		x	x		x
Shen et al. (2009)	Steel	x					
Sidenko et al. (2001)	Zn			x	x		
Singh et al. (2008)	Fe	x					
Sobanska et al. (2000)	Pb	x		x	x		
Suer et al. (2009)	Steel	x					
Svirenko et al. (2003)	Fe	x		x	x	x	
Tack et al. (1993)	Non-ferrous		x				
Tatarinov (2002)	Cu	x		x	x		
Tetra Tech Inc (1985)	Cu		x				
Tossavainen et al. (2007)	Steel	x	x	x			
Tsakiridis et al. (2008)	Steel	x					
Twidwell (1983)	Cu, Pb		x				
Twidwell and Mehta (1985)	Cu, Pb		x				
Vdovič et al. (2006)	Pb–Zn			x			

## Appendix A (continued)

References	Slag type	Chemistry	Leachate	Methods	Mineralogy	Sec. min.	EMPA
Vítková et al. (2010)	Cu–Co	x		x	x		x
Vítková et al. (2011)	Cu–Co	x	x	x	x		
Vivencio and Farthing (2005)	Fe			x	x		
Wendling et al. (2010)	Steel	x		x	x		
Wendling et al. (2012)	Steel		x				
Wendling et al. (2013)	Fe, steel	x	x	x	x		
West (1902)	Fe	x					
Wilson (1994)	Many			x			
Woodley and Walters (1986)	Pb BFS		x	x			
Yildirim and Prezzi (2011)	Steel	x		x	x		
Ziemkiewicz and Skousen (1999)	Steel	x	x	x			

Abbreviations: Sec. min. = secondary minerals, EMPA = electron microprobe analysis, x = indicates type of data reported in article, Fe = blast furnace iron.

## Appendix B. Summary of slag application and reuse references for this paper (not including references listed above)

References	Slag type
Ali et al. (2008)	Steel
Anand et al. (1980)	Cu
Anderson (1991)	Ferrous
Baker et al. (1998)	Steel
Blowes et al. (2005)	Steel
Bowden et al. (2009)	Steel
Chang et al. (2013)	Fe
Cravotta (2005)	Fe
Dimitrova (2002)	Fe
Drizo et al. (2002)	Steel
Drizo et al. (2006)	Steel
EUROSLAG (2006)	Ferrous
FHWA (1997)	Steel, Cu, P, Ni, Pb
Gahan et al. (2009)	Steel
Gbor et al. (2006)	Ni
Gbor et al. (2000)	Ni
Gorai et al. (2003)	Cu
Hadjsadok et al. (2012)	Fe
Hanski et al. (2007)	Steel
Hanski and Kankaala (2009)	Steel
Kwon et al. (2008)	Steel
Li et al. (2009)	Cu–Ni
Lopez et al. (1997)	Steel
Lopez Gomez et al. (1999)	Steel
Maslehuddin et al. (2003)	Steel
Negim et al. (2010)	Steel
Ochola and Moo-Young (2004)	Steel
Park et al. (1994)	Steel
Qiu et al. (2012)	Steel
Rao and Nayak (1992)	Cu
Sánchez and Sudbury (2013)	Cu
Shelley (1975)	Non-ferrous
Shibayama et al. (2010)	Non-ferrous
Simmons et al. (2002)	Steel
Srivastava et al. (2005)	Steel
Sun et al. (2009)	Steel
Tshiongo et al. (2010)	Cu
Van Oss (2013)	Ferrous
Weber et al. (2007)	Steel
Yang et al. (2010)	Cu
Ziemkiewicz and Skousen (1999)	Steel

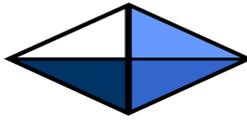
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**ALL-PHASE**  
ENVIRONMENTAL CONSULTANTS, INC.

**PREPARED FOR:**

Brown Properties  
1103 S Santa Fe Ave  
Pueblo CO 81006  
c/o Cecil Brown, Owner

**SUBJECT PROPERTY:**

Brown Properties  
1103 S. Santa Fe Ave.  
Pueblo, CO 81006  
Sampling Locations: EPA OU2 Sample Designation Locations  
DU-0031, DU-0032, DU-0033, DU-0035

## **Brown Property - Soil Confirmation Investigation for Arsenic and Lead**



**Prepared by:**

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Date of Sample Collection: December 22, 2021  
Date Laboratory Report Received: January 6, 2022  
Date of Report: February 14, 2022

**I. INTRODUCTION:**

On December 22, 2021, All-Phase Environmental Consultants, Inc. (APEC) personnel Logan Greenfield, Senior Scientist and Joseph Cardenas, Staff Scientist conducted soil confirmation sampling in the areas identified as DU-0031, DU-0032, DU-0033 and DU-0035, at the property generally referenced as the “Brown Property”, hereinafter referred to as the “Property”. The sample locations were labeled by EPA during their soil investigations in March 2020, and APEC followed the same sample label protocol. The latitude and longitude of the original sample locations (EPA locations) were used to duplicate the sample efforts. It should be noted that GPS locations can vary by up to 6 feet, depending on the app or device used. APEC collected native soil samples that were as close to the EPA locations as is possible with field GPS instrumentation. The purpose of this investigation was to verify/determine if soil contamination exists, specifically total lead and arsenic, at the locations identified herein. Additionally, a TCLP (Toxicity Characteristic Leaching Procedure) test was conducted on each sample, with the Preparation by Method 1311 on both Arsenic and Lead. In basic terms, the TCLP or Toxicity Characteristic Leaching Procedure is a chemical analysis process used to determine whether there are hazardous elements present in a waste, in this case soil. The test involves a simulation of leaching through a landfill and can provide a rating that can prove if the waste is dangerous to the environment or not.

**Table 1: Areas Investigated and GPS coordinates**

	EPA Labeled Location	Depth	Latitude	Longitude
EPA APEC	DU-0031	12" – 18"	38.24772	-104.607
		12" – 18"	38.24772	-104.60708
	DU-0032	18" – 24"	38.24817	-104.609
		18" – 24"	38.24818	-104.6096
	DU-0033	1" – 6"	38.24866	-104.609
		1" – 6"	38.24866	-104.60875
	DU-0035	1"-6", 6"-12", 12"-18", 18"-24"	38.24867	-104.608
		*1" – 24" Composite	38.24876	-104.6081

\*Sample DU-0035 was homogenized, from 0-24 inches, in the field, to include all EPA depths above Regional Screening Levels (RSL’s)

***See Attachment B for sample locations/notes and Attachment C for coordinates/notes***

**II. FIELD SAMPLING PROTOCOL:**

The following provides APEC’s standard operating field procedures (SOFP) that was followed for the collection of the samples:

1. Walk the Property to verify locations and if any obstacles/obstructions were present.
2. Use of both a GPS and OnX mapping app to verify coordinates and locations.
3. Sampling Tool Used – AMS Soil Boring Environmental Kit
  - All tools are Stainless steel for environmental sampling
  - Tee handle coring handle
  - 6” x 2 ¼” Auger
  - Slide hammer recovery
  - 6” clear sampling recovery liners w/end caps
4. Gloves are worn during all sampling activities
  - Any tears, gloves are immediately changed
  - Gloves are changed every 6”
5. AMS sampling tools are decontaminated every 6” as to not impact other depths
  - Distilled water with Alconox® was used for all decontamination (***Safety Data Sheets (SDS)-Attachment E***)
6. After 6 inches is removed by AMS auger, excess dirt was removed. Sample is representative of the desired sample depth.
7. Once sample is obtained at desired depth, immediately remove sleeve and cap.
8. Immediately log time
9. Immediately place on ice (preserve per laboratory instructions)
10. Decontamination of all equipment between samples

***This SOFP (Standard Operating Field Procedures) was followed and replicated for each individual sample location and depth.***

**Table 2: Laboratory Sample Analytical Methods**

Sample ID	Analysis	Method
DU-0031, DU-0032, DU-0033, DU-0035	Metals (ICP) - Lead	6010B
	Metals (ICP) - Arsenic	
DU-0031, DU-0032, DU-0033, DU-0035	TCLP Lead	Prep – 1311 6010B
	TCLP Arsenic	

\*See attached lab report-***Attachment D***

**Table 3: Analytical Results**

Sample Date	12/22/2021	3/17/2021	12/22/2021	3/13/2021	12/22/2021	3/13/2021	12/22/2021	3/19/2021	
Sample Matrix	Soil								
Sample ID	DU-0031	DU-0031	DU-0032	DU-0032	DU-0033	DU-0033	DU-0035	DU-0035	RSL Industrial Soil Value
Analytical Parameter	Results (mg/kg)	(mg/kg)							
Sample Depth	12-18 inches	12-18 inches	18-24 inches	18-24 inches	1-6 inches	1-6 inches	1-24 inches	18-24 inches**	
Arsenic	16.2	29.0	<b>124</b>	<b>103</b>	ND	<b>165</b>	<b>124</b>	<b>930</b>	<b>61*</b>
Lead	346	<b>1160</b>	<b>5260</b>	<b>2360</b>	79.4	<b>1070</b>	<b>1410</b>	<b>3950</b>	<b>800</b>
TCLP Arsenic	ND	NA	ND	NA	ND	NA	ND	NA	<b>5.0</b>
TCLP Lead	0.822	NA	<b>25.2</b>	NA	ND	NA	4.38	NA	<b>5.0</b>

ND = Non-Detect

BOLD - limits above

RSL's

\*OU1 Site Specific RESIDENTIAL Soil Value

\*\*highest value in soil column

NA - Not Analyzed

Light Yellow Columns are APEC data

Blue Columns are EPA collected data

RSL – Regional Screening Levels

**III. FINDINGS:**

APEC sample results indicate there are elevated levels of lead and arsenic in soils, specifically along the northern property boundary (DU-0032, DU-0033, DU-0035) when compared to current EPA RSLs for Lead and TCLP Lead, and the OU1 Site Specific Residential Soil Value for Arsenic, that has been established for the Colorado Smelter and Superfund Site. It should be noted that the Property is not zoned nor is it utilized as residential. It is an industrial zoned property, specifically, I-2. The zoning description, as well as the uses by right are attached as Attachment H. Therefore, until a site-specific value is determined for the Property and the specific zoning/use type, it is speculative to indicate whether or not arsenic, specifically, is above RSLs. All arsenic samples were below the TCLP threshold of 5 mg/kg. The lead is elevated in all samples with the exception of DU-0031 (APEC Sample) and DU-0033 (APEC Sample). The only TCLP exceedance was in sample DU-0032, at 25.2 mg/kg. Further investigation may be warranted in this northern property area and/or remedial efforts may be necessary dependent upon site specific arsenic RSLs that have yet to be established. Delineation of the TCLP results will better define what area specifically needs to be “capped” by an impervious surface, however with the vast amount of EPA data, coupled with the APEC results, initial opinions are that DU-0032 (area 32) may be the highest/only priority. Furthermore, the remaining parcels, as a remedial solution, could operate under a Materials Management Plan and potentially “use restrictions” to ensure that human health is protected

during any potential work on site, specifically underground digging (utility work, etc.) and from future development, other than industrial.

#### **IV. LIMITATIONS:**

There is a possibility that contamination could exist elsewhere on the Property, either in soil, groundwater or any other type of media, which was not sampled as part of the SOW. APEC uses their professional judgment to determine the best practices to produce the most accurate representation of the site and the subsurface soil. APEC is not responsible for any limitations or restraints that may have affected the determination of the site conditions as they did not produce the initial SOW, including any not listed herein.

APEC will not be held responsible if additional contaminants are found at the subject property at a later date, or if contaminants are located at various locations on the property not included in the SOW. Professional services will be performed in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the locality of the project. No warranty, express or implied, is made or intended. APEC is not responsible for any independent conclusions or recommendations made by others based on the services provided on this project. All-Phase will not be held liable for environmental conditions that may exist where the necessary sampling and evaluations were not conducted.

#### **V. ATTACHMENTS:**

Included in this report are the following attachments:

- A. General Site Sampling and Location Photographs
- B. Provided Map with Field Notes
- C. Previous Location Table with Field Notes
- D. Laboratory Report – PACE Analytical
- E. SDS - Alconox<sup>®</sup>
- F. OnX Map
- G. OnX Latitude/Longitude Pictures
- H. Zoning Map and Description

**VI. SIGNATURES:**

*Signature(s) if Individual(s) Responsible for Performing the Soil Confirmation Investigation:*

A handwritten signature in blue ink, appearing to read "Logan Greenfield", written over a horizontal line.

Mr. Logan Greenfield, Sr. Scientist

A handwritten signature in blue ink, appearing to read "Joseph Cardenas", written over a horizontal line.

Mr. Joseph Cardenas, Staff Scientist

*Signature(s) if Individual(s) Responsible for Preparing the Draft Report:*

A handwritten signature in blue ink, appearing to read "Logan Greenfield", written over a horizontal line.

Mr. Logan Greenfield, Sr. Scientist

*Signature(s) if Individual(s) Responsible for Reviewing the Phase II ESA Report:*

A handwritten signature in blue ink, appearing to read "Brandice Eslinger", written over a horizontal line.

Mrs. Brandice Eslinger, Environmental Professional/Scientist

### Attachment A: General Site Sampling and Location Photographs



Typical Ground cover and building



General sampling location and ground cover



General sampling location and ground cover



Typical sampling method with auger



Typical depth verification and boring hole



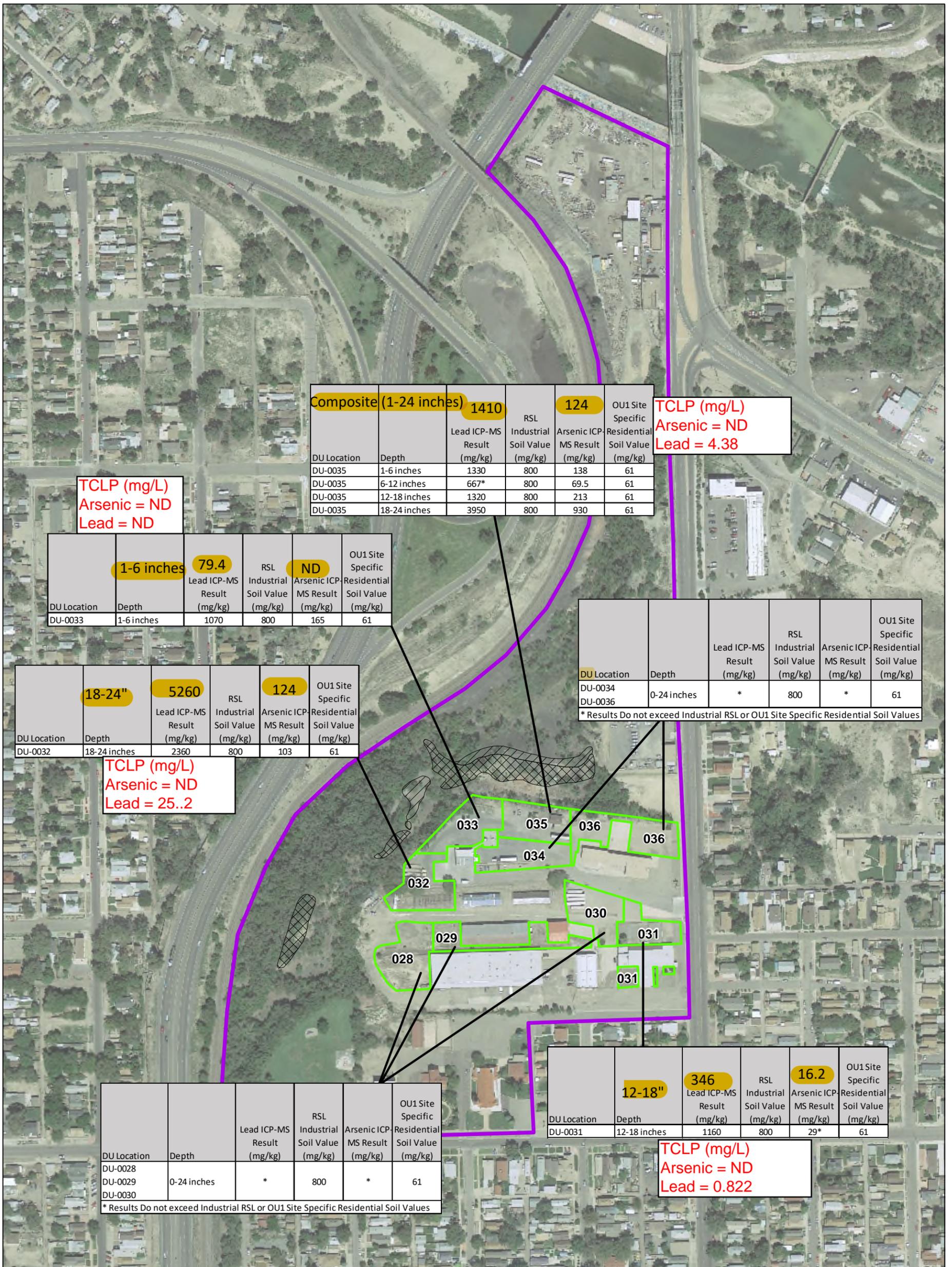
Typical depth verification and boring hole



Typical sampling tools and sleeve

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**Attachment B: Provided Map with Field Notes**



Composite (1-24 inches)		1410	RSL Industrial Soil Value (mg/kg)	124	OU1 Site Specific Residential Soil Value (mg/kg)	TCLP (mg/L) Arsenic = ND Lead = 4.38
DU Location	Depth	Lead ICP-MS Result (mg/kg)		Arsenic ICP-MS Result (mg/kg)		
DU-0035	1-6 inches	1330	800	138	61	
DU-0035	6-12 inches	667*	800	69.5	61	
DU-0035	12-18 inches	1320	800	213	61	
DU-0035	18-24 inches	3950	800	930	61	

TCLP (mg/L)  
Arsenic = ND  
Lead = ND

1-6 inches		79.4	RSL Industrial Soil Value (mg/kg)	ND	OU1 Site Specific Residential Soil Value (mg/kg)
DU Location	Depth	Lead ICP-MS Result (mg/kg)		Arsenic ICP-MS Result (mg/kg)	
DU-0033	1-6 inches	1070	800	165	61

DU Location	Depth	Lead ICP-MS Result (mg/kg)	RSL Industrial Soil Value (mg/kg)	Arsenic ICP-MS Result (mg/kg)	OU1 Site Specific Residential Soil Value (mg/kg)
DU-0034	0-24 inches	*	800	*	61
DU-0036					

\* Results Do not exceed Industrial RSL or OU1 Site Specific Residential Soil Values

18-24"		5260	RSL Industrial Soil Value (mg/kg)	124	OU1 Site Specific Residential Soil Value (mg/kg)
DU Location	Depth	Lead ICP-MS Result (mg/kg)		Arsenic ICP-MS Result (mg/kg)	
DU-0032	18-24 inches	2360	800	103	61

TCLP (mg/L)  
Arsenic = ND  
Lead = 25..2

12-18"		346	RSL Industrial Soil Value (mg/kg)	16.2	OU1 Site Specific Residential Soil Value (mg/kg)
DU Location	Depth	Lead ICP-MS Result (mg/kg)		Arsenic ICP-MS Result (mg/kg)	
DU-0031	12-18 inches	1160	800	29*	61

TCLP (mg/L)  
Arsenic = ND  
Lead = 0.822

DU Location	Depth	Lead ICP-MS Result (mg/kg)	RSL Industrial Soil Value (mg/kg)	Arsenic ICP-MS Result (mg/kg)	OU1 Site Specific Residential Soil Value (mg/kg)
DU-0028	0-24 inches	*	800	*	61
DU-0029					
DU-0030					

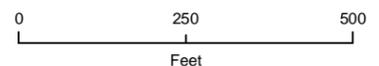
\* Results Do not exceed Industrial RSL or OU1 Site Specific Residential Soil Values

Legend

- OU2 Site Boundary
- Surface Soil Decision Units
- Crushed Slag Material
- Massive Slag Pile

### Colorado Smelter Site Brown Property Industrial Soil Risk Screening Level Exceedances

#### Colorado Smelter Superfund Site OU2



NOTE: \* Result Does Not Exceed Industrial Soil Risk Screening Level

NAD 1983 StatePlane Colorado South FIPS 0503 Feet  
Imagery: Google Earth dated August 2013  
Data: City and County of Pueblo



Map Created: 7/7/2020  
Map Created By: DM

## **Attachment C: Previous Location Table with Field Notes**

Location	LocationDescription	Latitude	Longitude	Northing	Easting
DU-0028	Area C, OU2	38.2476	-104.61	1576879	3255715
DU-0029	Area C, OU2	38.24774	-104.609	1576932	3255986
DU-0030	Area C, OU2	38.24795	-104.608	1577013	3256262
DU-0031	Area C, OU2	38.24772	-104.607	1576931	3256404
DU-0032	Area C, OU2	38.24817	-104.609	1577086	3255759
DU-0033	Area C, OU2	38.24866	-104.609	1577266	3255888
DU-0034	Area C, OU2	38.24841	-104.608	1577177	3256049
DU-0035	Area C, OU2	38.24867	-104.608	1577274	3256089
DU-0036	Area C, OU2	38.24858	-104.607	1577243	3256351

Does not match map - Not close  
 ? Pulled based on map as 0035  
 • is close to same location as 0036

Get your  
Coordinates

~~Total~~  
~~Lead~~  
~~Arsenic~~

~~Total~~  
~~bag~~

**Attachment D: Laboratory Report – PACE Analytical**

## All Phase Environmental - CO

Sample Delivery Group: L1445634  
Samples Received: 12/23/2021  
Project Number: 21-4594  
Description: Brown

Report To: Logan Greenfield  
721 W. 9th Street  
Pueblo, CO 81003

Entire Report Reviewed By:



Kelly Mercer  
Project Manager

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by Pace Analytical National is performed per guidance provided in laboratory standard operating procedures ENV-SOP-MTJL-0067 and ENV-SOP-MTJL-0068. Where sampling conducted by the customer, results relate to the accuracy of the information provided, and as the samples are received.

Pace Analytical National

12065 Lebanon Rd Mount Juliet, TN 37122 615-758-5858 800-767-5859 www.pacenational.com

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# SAMPLE SUMMARY

## DU-0031-CONFIRM L1445634-01 Solid

Collected by Logan Greenfield    Collected date/time 12/22/21 10:35    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Metals (ICP) by Method 6010B	WG1795535	1	12/28/21 13:27	12/28/21 23:25	CCE	Mt. Juliet, TN

1 Cp

2 Tc

## DU-0031-CONFIRM L1445634-02 Waste

Collected by Logan Greenfield    Collected date/time 12/22/21 10:35    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Preparation by Method 1311	WG1794953	1	12/27/21 08:58	12/27/21 08:58	APH	Mt. Juliet, TN
Metals (ICP) by Method 6010B	WG1795625	1	12/28/21 15:35	12/29/21 14:35	CCE	Mt. Juliet, TN

3 Ss

4 Cn

5 Sr

## DU-0032-CONFIRM L1445634-03 Solid

Collected by Logan Greenfield    Collected date/time 12/22/21 11:13    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Metals (ICP) by Method 6010B	WG1795535	1	12/28/21 13:27	12/28/21 23:28	CCE	Mt. Juliet, TN

6 Qc

7 Gl

8 Al

## DU-0032-CONFIRM L1445634-04 Waste

Collected by Logan Greenfield    Collected date/time 12/22/21 11:13    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Preparation by Method 1311	WG1794953	1	12/27/21 08:58	12/27/21 08:58	APH	Mt. Juliet, TN
Metals (ICP) by Method 6010B	WG1795629	1	12/28/21 13:44	12/29/21 10:26	CCE	Mt. Juliet, TN

9 Sc

## DU-0033-CONFIRM L1445634-05 Solid

Collected by Logan Greenfield    Collected date/time 12/22/21 11:42    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Metals (ICP) by Method 6010B	WG1795535	5	12/28/21 13:27	12/29/21 21:59	CCE	Mt. Juliet, TN

## DU-0033-CONFIRM L1445634-06 Waste

Collected by Logan Greenfield    Collected date/time 12/22/21 11:42    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Preparation by Method 1311	WG1797565	1	01/03/22 17:40	01/03/22 17:40	CJW	Mt. Juliet, TN
Metals (ICP) by Method 6010B	WG1797948	1	01/04/22 14:32	01/05/22 09:27	KMG	Mt. Juliet, TN

## DU-0035-CONFIRM L1445634-07 Solid

Collected by Logan Greenfield    Collected date/time 12/22/21 12:06    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Metals (ICP) by Method 6010B	WG1795535	1	12/28/21 13:27	12/28/21 23:33	CCE	Mt. Juliet, TN

## DU-0035-CONFIRM L1445634-08 Waste

Collected by Logan Greenfield    Collected date/time 12/22/21 12:06    Received date/time 12/23/21 09:50

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Preparation by Method 1311	WG1797565	1	01/03/22 17:40	01/03/22 17:40	CJW	Mt. Juliet, TN
Metals (ICP) by Method 6010B	WG1797948	1	01/04/22 14:32	01/05/22 09:35	KMG	Mt. Juliet, TN

# CASE NARRATIVE

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.



Kelly Mercer  
Project Manager

## Report Revision History

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Level II Report - Version 1: 01/06/22 09:46

## Project Narrative

---

Reissued for ID corrections.

<sup>1</sup> Cp

<sup>2</sup> Tc

<sup>3</sup> Ss

<sup>4</sup> Cn

<sup>5</sup> Sr

<sup>6</sup> Qc

<sup>7</sup> Gl

<sup>8</sup> Al

<sup>9</sup> Sc

Metals (ICP) by Method 6010B

Analyte	Result mg/kg	Qualifier	RDL mg/kg	Dilution	Analysis date / time	Batch
Arsenic	16.2		2.00	1	12/28/2021 23:25	<a href="#">WG1795535</a>
Lead	346		0.500	1	12/28/2021 23:25	<a href="#">WG1795535</a>

- <sup>1</sup>Cp
- <sup>2</sup>Tc
- <sup>3</sup>Ss
- <sup>4</sup>Cn
- <sup>5</sup>Sr
- <sup>6</sup>Qc
- <sup>7</sup>Gl
- <sup>8</sup>Al
- <sup>9</sup>Sc

Preparation by Method 1311

Analyte	Result	Qualifier	Prep date / time	Batch
TCLP Extraction	-		12/27/2021 8:58:02 AM	WG1794953
Fluid	2		12/27/2021 8:58:02 AM	WG1794953
Initial pH	9.12		12/27/2021 8:58:02 AM	WG1794953
Final pH	5.66		12/27/2021 8:58:02 AM	WG1794953

<sup>1</sup> Cp

<sup>2</sup> Tc

<sup>3</sup> Ss

<sup>4</sup> Cn

Metals (ICP) by Method 6010B

Analyte	Result mg/l	Qualifier	RDL mg/l	Limit mg/l	Dilution	Analysis date / time	Batch
Arsenic	ND		0.100	5	1	12/29/2021 14:35	<a href="#">WG1795625</a>
Lead	0.822		0.100	5	1	12/29/2021 14:35	<a href="#">WG1795625</a>

<sup>5</sup> Sr

<sup>6</sup> Qc

<sup>7</sup> Gl

<sup>8</sup> Al

<sup>9</sup> Sc

Metals (ICP) by Method 6010B

Analyte	Result mg/kg	Qualifier	RDL mg/kg	Dilution	Analysis date / time	Batch
Arsenic	124		2.00	1	12/28/2021 23:28	<a href="#">WG1795535</a>
Lead	5260		0.500	1	12/28/2021 23:28	<a href="#">WG1795535</a>

- 1 Cp
- 2 Tc
- 3 Ss
- 4 Cn
- 5 Sr
- 6 Qc
- 7 Gl
- 8 Al
- 9 Sc

Preparation by Method 1311

Analyte	Result	Qualifier	Prep date / time	Batch
TCLP Extraction	-		12/27/2021 8:58:02 AM	WG1794953
Fluid	1		12/27/2021 8:58:02 AM	WG1794953
Initial pH	7.42		12/27/2021 8:58:02 AM	WG1794953
Final pH	5.72		12/27/2021 8:58:02 AM	WG1794953

Metals (ICP) by Method 6010B

Analyte	Result	Qualifier	RDL	Limit	Dilution	Analysis date / time	Batch
Arsenic	ND		0.100	5	1	12/29/2021 10:26	<a href="#">WG1795629</a>
Lead	25.2		0.100	5	1	12/29/2021 10:26	<a href="#">WG1795629</a>

- 1 Cp
- 2 Tc
- 3 Ss
- 4 Cn
- 5 Sr
- 6 Qc
- 7 Gl
- 8 Al
- 9 Sc

Metals (ICP) by Method 6010B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Arsenic	ND		10.0	5	12/29/2021 21:59	<a href="#">WG1795535</a>
Lead	79.4		2.50	5	12/29/2021 21:59	<a href="#">WG1795535</a>

- 1 Cp
- 2 Tc
- 3 Ss
- 4 Cn
- 5 Sr
- 6 Qc
- 7 Gl
- 8 Al
- 9 Sc

Preparation by Method 1311

Analyte	Result	Qualifier	Prep date / time	Batch
TCLP Extraction	-		1/3/2022 5:40:35 PM	WG1797565
Fluid	1		1/3/2022 5:40:35 PM	WG1797565
Initial pH	9.64		1/3/2022 5:40:35 PM	WG1797565
Final pH	6.48		1/3/2022 5:40:35 PM	WG1797565

Metals (ICP) by Method 6010B

Analyte	Result mg/l	Qualifier	RDL mg/l	Limit mg/l	Dilution	Analysis date / time	Batch
Arsenic	ND		0.100	5	1	01/05/2022 09:27	<a href="#">WG1797948</a>
Lead	ND		0.100	5	1	01/05/2022 09:27	<a href="#">WG1797948</a>

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc

Metals (ICP) by Method 6010B

Analyte	Result mg/kg	Qualifier	RDL mg/kg	Dilution	Analysis date / time	Batch
Arsenic	124		2.00	1	12/28/2021 23:33	<a href="#">WG1795535</a>
Lead	1410		0.500	1	12/28/2021 23:33	<a href="#">WG1795535</a>

- <sup>1</sup>Cp
- <sup>2</sup>Tc
- <sup>3</sup>Ss
- <sup>4</sup>Cn
- <sup>5</sup>Sr
- <sup>6</sup>Qc
- <sup>7</sup>Gl
- <sup>8</sup>Al
- <sup>9</sup>Sc

Preparation by Method 1311

Analyte	Result	Qualifier	Prep date / time	Batch
TCLP Extraction	-		1/3/2022 5:40:35 PM	WG1797565
Fluid	1		1/3/2022 5:40:35 PM	WG1797565
Initial pH	9.39		1/3/2022 5:40:35 PM	WG1797565
Final pH	5.92		1/3/2022 5:40:35 PM	WG1797565

Metals (ICP) by Method 6010B

Analyte	Result mg/l	Qualifier	RDL mg/l	Limit mg/l	Dilution	Analysis date / time	Batch
Arsenic	ND		0.100	5	1	01/05/2022 09:35	<a href="#">WG1797948</a>
Lead	4.38		0.100	5	1	01/05/2022 09:35	<a href="#">WG1797948</a>

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc

Method Blank (MB)

(MB) R3745859-1 12/28/21 22:50

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
	mg/kg		mg/kg	mg/kg
Arsenic	U		0.518	2.00
Lead	U		0.208	0.500

Laboratory Control Sample (LCS)

(LCS) R3745859-2 12/28/21 22:53

Analyte	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
	mg/kg	mg/kg	%	%	
Arsenic	100	97.7	97.7	80.0-120	
Lead	100	99.5	99.5	80.0-120	

L1438278-02 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1438278-02 12/28/21 22:55 • (MS) R3745859-5 12/28/21 23:03 • (MSD) R3745859-6 12/28/21 23:05

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
	mg/kg	mg/kg	mg/kg	mg/kg	%	%		%			%	%
Arsenic	100	ND	91.0	91.2	89.4	89.7	1	75.0-125			0.228	20
Lead	100	28.0	126	120	98.2	92.0	1	75.0-125			5.06	20

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc

Method Blank (MB)

(MB) R3746200-1 12/29/21 14:30

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
	mg/l		mg/l	mg/l
Arsenic	U		0.0330	0.100
Lead	U		0.0330	0.100

Laboratory Control Sample (LCS)

(LCS) R3746200-2 12/29/21 14:32

Analyte	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
	mg/l	mg/l	%	%	
Arsenic	10.0	9.42	94.2	80.0-120	
Lead	10.0	9.66	96.6	80.0-120	

L1445634-02 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1445634-02 12/29/21 14:35 • (MS) R3746200-4 12/29/21 14:41 • (MSD) R3746200-5 12/29/21 14:43

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
	mg/l	mg/l	mg/l	mg/l	%	%		%			%	%
Arsenic	10.0	ND	9.55	9.53	95.2	95.0	1	75.0-125			0.213	20
Lead	10.0	0.822	10.4	10.3	95.4	95.0	1	75.0-125			0.390	20

<sup>1</sup>Cp

<sup>2</sup>Tc

<sup>3</sup>Ss

<sup>4</sup>Cn

<sup>5</sup>Sr

<sup>6</sup>Qc

<sup>7</sup>Gl

<sup>8</sup>Al

<sup>9</sup>Sc

Method Blank (MB)

(MB) R3746197-1 12/29/21 10:34

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
	mg/l		mg/l	mg/l
Arsenic	U		0.0333	0.100
Lead	U		0.0333	0.100

<sup>1</sup>Cp

<sup>2</sup>Tc

<sup>3</sup>Ss

<sup>4</sup>Cn

<sup>5</sup>Sr

<sup>6</sup>Qc

<sup>7</sup>Gl

<sup>8</sup>Al

<sup>9</sup>Sc

Laboratory Control Sample (LCS)

(LCS) R3746197-2 12/29/21 10:36

Analyte	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
	mg/l	mg/l	%	%	
Arsenic	10.0	9.96	99.6	80.0-120	
Lead	10.0	10.2	102	80.0-120	

L1444667-04 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1444667-04 12/29/21 10:39 • (MS) R3746197-4 12/29/21 10:44 • (MSD) R3746197-5 12/29/21 10:47

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
	mg/l	mg/l	mg/l	mg/l	%	%		%			%	%
Arsenic	10.0	ND	10.2	10.2	102	102	1	75.0-125			0.0307	20
Lead	10.0	ND	10.4	10.5	104	105	1	75.0-125			1.56	20

Method Blank (MB)

(MB) R3747801-1 01/05/22 08:31

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
	mg/l		mg/l	mg/l
Arsenic	U		0.0333	0.100
Lead	U		0.0333	0.100

Laboratory Control Sample (LCS)

(LCS) R3747801-2 01/05/22 08:33

Analyte	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
	mg/l	mg/l	%	%	
Arsenic	10.0	8.92	89.2	80.0-120	
Lead	10.0	9.04	90.4	80.0-120	

L1440446-22 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1440446-22 01/05/22 08:36 • (MS) R3747801-4 01/05/22 08:41 • (MSD) R3747801-5 01/05/22 08:44

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
	mg/l	mg/l	mg/l	mg/l	%	%		%			%	%
Arsenic	10.0	ND	9.17	9.16	91.3	91.3	1	75.0-125			0.0915	20
Lead	10.0	ND	9.06	9.12	90.0	90.6	1	75.0-125			0.676	20

L1446620-02 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1446620-02 01/05/22 08:47 • (MS) R3747801-6 01/05/22 08:49 • (MSD) R3747801-7 01/05/22 08:52

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
	mg/l	mg/l	mg/l	mg/l	%	%		%			%	%
Arsenic	10.0	ND	9.13	9.01	90.5	89.3	1	75.0-125			1.38	20
Lead	10.0	ND	9.01	8.99	90.1	89.9	1	75.0-125			0.257	20

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc

# GLOSSARY OF TERMS

## Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

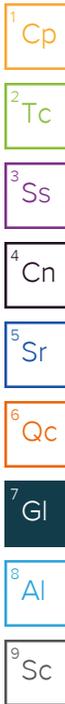
Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

### Abbreviations and Definitions

MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state "ND" (Not Detected) or "BDL" (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

### Qualifier Description

The remainder of this page intentionally left blank, there are no qualifiers applied to this SDG.



# ACCREDITATIONS & LOCATIONS

## Pace Analytical National 12065 Lebanon Rd Mount Juliet, TN 37122

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN000032021-1
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico <sup>1</sup>	TN00003
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina <sup>1</sup>	DW21704
Georgia	NELAP	North Carolina <sup>3</sup>	41
Georgia <sup>1</sup>	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LA000356
Kentucky <sup>1,6</sup>	KY90010	South Carolina	84004002
Kentucky <sup>2</sup>	16	South Dakota	n/a
Louisiana	AI30792	Tennessee <sup>1,4</sup>	2006
Louisiana	LA018	Texas	T104704245-20-18
Maine	TN00003	Texas <sup>5</sup>	LAB0152
Maryland	324	Utah	TN000032021-11
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	110033
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	998093910
Montana	CERT0086	Wyoming	A2LA
A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 <sup>5</sup>	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

<sup>1</sup> Drinking Water <sup>2</sup> Underground Storage Tanks <sup>3</sup> Aquatic Toxicity <sup>4</sup> Chemical/Microbiological <sup>5</sup> Mold <sup>6</sup> Wastewater n/a Accreditation not applicable

\* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

\* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace Analytical.

<sup>1</sup> Cp

<sup>2</sup> Tc

<sup>3</sup> Ss

<sup>4</sup> Cn

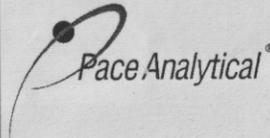
<sup>5</sup> Sr

<sup>6</sup> Qc

<sup>7</sup> Gl

<sup>8</sup> Al

<sup>9</sup> Sc

Company Name/Address: <b>All Phase Environmental - CO</b>  721 W. 9th Street Pueblo, CO 81003		Billing Information: <b>Logan Greenfield</b> 721 W. 9th Street Pueblo, CO 81003		Pres Chk		Analysis / Container / Preservative										Chain of Custody Page 1 of 1		
Report to: <i>Logan Greenfield</i>		Email To: <i>logan@allphaseenvironmental.com</i>														 Submitting a sample via this chain of custody constitutes acknowledgment and acceptance of the Pace Terms and Conditions found at: <a href="https://info.pacelabs.com/hubs/pas-standard-terms.pdf">https://info.pacelabs.com/hubs/pas-standard-terms.pdf</a>		
Project Description: <i>Brown</i>		City/State Collected: <i>Pueblo/CO</i>		Please Circle: PT <input checked="" type="radio"/> MT <input type="radio"/> CT <input type="radio"/> ET														
Phone: <b>719-545-0375</b>		Client Project # <i>21-4594</i>		Lab Project #												SDG # <i>L1445634</i> <b>B219</b>		
Collected by (print): <i>Logan Greenfield</i>		Site/Facility ID #		P.O. #												Acctnum: <b>ALLPHAPCO</b>		
Collected by (signature): <i>[Signature]</i>		Rush? (Lab MUST Be Notified) <input type="checkbox"/> Same Day <input checked="" type="checkbox"/> Five Day <input type="checkbox"/> Next Day <input type="checkbox"/> 5 Day (Rad Only) <input type="checkbox"/> Two Day <input type="checkbox"/> 10 Day (Rad Only) <input type="checkbox"/> Three Day		Quote #												Template: Prelogin: PM: <b>824 - Chris Ward</b>		
Immediately Packed on Ice N <input type="checkbox"/> Y <input checked="" type="checkbox"/>		Date Results Needed		No. of Cntrs												PB: Shipped Via:		
Sample ID		Comp/Grab	Matrix *	Depth	Date	Time											Remarks	Sample # (lab only)
<i>DU-0031 - CONFIRM</i>		<i>Grab</i>	<i>SS</i>	<i>12"-18"</i>	<i>12-22-21</i>	<i>10:35a</i>	<i>1</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>							<i>-01,02</i>
<i>DU-0032 - CONFIRM</i>		<i>Grab</i>	<i>↓</i>	<i>18"-24"</i>	<i>↓</i>	<i>11:13a</i>	<i>1</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>							<i>-03,04</i>
<i>DU-0033 - CONFIRM</i>		<i>Grab</i>	<i>↓</i>	<i>1"-6"</i>	<i>↓</i>	<i>11:42a</i>	<i>1</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>							<i>-05,06</i>
<i>DU-0035 - CONFIRM</i>		<i>Comp</i>	<i>↓</i>	<i>1"-24"</i>	<i>↓</i>	<i>12:06p</i>	<i>3</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>							<i>-07,08</i>

**Attachment E: SDS - Alconox®**

Effective date: 11 May 2020  
Trade Name: Alconox®

Revision: 11 May 2020

## I Identification of the substance/mixture and of the supplier

### I.1 GHS Product identifier

Trade Name: Alconox®

Product number: 1101, 1103, 1104, 1104-1, 1112, 1112-1, 1125, 1150

### I.2 Application of the substance / the mixture: Cleaning material/Detergent

I.2.1 Recommended dilution ratio: 1 – 2% in water

### I.3 Details of the supplier of the Safety Data Sheet

**Manufacturer:**

Alconox Inc.  
30 Glenn St  
White Plains, NY 10603  
(914) 948-4040

**Supplier:**

**Emergency telephone number:**

ChemTel Inc

North America: 1-888-255-3924

International: +1 813-248-0573

## 2 Hazards identification

### 2.1 Classification of the substance or mixture:

In compliance with EC regulation No. 1272, 29CFR1910/1200 and GHS requirements.

**Hazard-determining components of labeling:**

Tetrasodium Pyrophosphate  
Sodium tripolyphosphate  
Sodium Alkylbenzene Sulfonate

### 2.2 Label elements:

Eye damage, category 1.

Skin irritation, category 2.

### Product at recommended dilution:

Eye irritation, category 2B

### Hazard pictograms:



**Signal word:** Danger

**Hazard statements:**

H315 Causes skin irritation.

H318 Causes serious eye damage.

**Precautionary statements:**

P264 Wash skin thoroughly after handling.

Effective date: 11 May 2020

Revision: 11 May 2020

Trade Name: Alconox®

- P280 Wear protective gloves/protective clothing/eye protection/face protection.  
 P302+P352 If on skin: Wash with soap and water.  
 P305+P351+P338 If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do. Continue rinsing.  
 P321 Specific treatment (see supplemental first aid instructions on this label).  
 P332+P313 If skin irritation occurs: Get medical advice/attention.  
 P362 Take off contaminated clothing and wash before reuse.  
 P501 Dispose of contents and container as instructed in Section 13.

**Hazardous Elements at Use Dilution:**

Hazard Pictograms:

**Signal Word:** Warning**Hazard Statements:**

H320 Causes eye irritation

**Precautionary statements:**

- P302+P352 If on skin: Wash with soap and water.  
 P305+P351+P338 If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do. Continue rinsing.  
 P501 Dispose of contents and container as instructed in Section 13

**Additional information:** None.**Hazard description**

**Hazards Not Otherwise Classified (HNOC):** May cause surfaces to become slippery if wet. Use caution in areas of foot traffic if on floors.

**Information concerning particular hazards for humans and environment:**

The product has to be labelled due to the calculation procedure of the "General Classification guideline for preparations of the EU" in the latest valid version.

**Classification system:**

The classification is according to EC regulation No. 1272, 29CFR1910/1200 and GHS Requirements, and extended by company and literature data. The classification is in accordance with the latest editions of international substances lists and is supplemented by information from technical literature and by information provided by the company.

**3 Composition/information on ingredients**

**3.1 Chemical characterization:** Not determined or not available.

**3.2 Description:** None

**3.3 Hazardous components (percentages by weight)**

Identification	Chemical Name	Classification	Wt. %
<b>CAS number:</b> 7758-29-4	Sodium tripolyphosphate	Skin Irrit. 2; H315 Eye Irrit. 2; H319	12-28
<b>CAS number:</b> 68081-81-2 or 68411-30-3	Sodium Alkylbenzene Sulfonate	Acute Tox. 4; H303 Skin Irrit. 2; H315 Eye Dam. 1; H318	8-22
<b>CAS number:</b> 7722-88-5	Tetrasodium Pyrophosphate	Skin Irrit. 2; H315 Eye Irrit. 2; H319	2-16

**Effective date:** 11 May 2020  
**Trade Name:** Alconox®

**Revision:** 11 May 2020

Hazardous components at use dilution (percentages by weight):

Identification	Chemical Name	Classification	Wt. %
<b>CAS number:</b> 7758-29-4	Sodium tripolyphosphate	Eye Irrit. 2; H319	0.12 - 0.28
<b>CAS number:</b> 68081-81-2 or 68411-30-3	Sodium Alkylbenzene Sulfonate	Eye Irrit. 2; H319	0.08 – 0.22
<b>CAS number:</b> 7722-88-5	Tetrasodium Pyrophosphate	Eye Irrit. 2; H319	0.02 – 0.16

**3.4 Additional Information:** None.

#### 4 First aid measures

##### 4.1 Description of first aid measures

**General information:** None.

**After inhalation:**

Maintain an unobstructed airway.

Loosen clothing as necessary and position individual in a comfortable position.

**After skin contact:**

Wash affected area with soap and water.

Seek medical attention if symptoms develop or persist.

**After eye contact:**

Rinse/flush exposed eye(s) gently using water for 15-20 minutes.

Remove contact lens(es) if able to do so during rinsing.

Seek medical attention if irritation persists or if concerned.

**After swallowing:**

Rinse mouth thoroughly.

Seek medical attention if irritation, discomfort, or vomiting persists.

##### 4.2 Most important symptoms and effects, both acute and delayed

None

##### 4.3 Indication of any immediate medical attention and special treatment needed:

No additional information.

#### First aid measure at recommended dilution:

**General information:** None.

**After inhalation:**

Maintain an unobstructed airway.

Loosen clothing as necessary and position individual in a comfortable position.

**After skin contact:**

Wash affected area with soap and water.

**After eye contact:**

Rinse/flush exposed eye(s) gently using water for 15-20 minutes.

Remove contact lens(es) if able to do so during rinsing.

**After swallowing:**

Rinse mouth thoroughly. Seek medical attention if irritation, discomfort, or vomiting develops.

#### 5 Firefighting measures

**Effective date:** 11 May 2020  
**Trade Name:** Alconox<sup>®</sup>

**Revision:** 11 May 2020

### 5.1 Extinguishing media

**Suitable extinguishing agents:**

Use appropriate fire suppression agents for adjacent combustible materials or sources of ignition.

**For safety reasons unsuitable extinguishing agents:** None

### 5.2 Special hazards arising from the substance or mixture:

Thermal decomposition can lead to release of irritating gases and vapors.

### 5.3 Advice for firefighters

**Protective equipment:**

Wear protective eye wear, gloves and clothing.

Refer to Section 8.

### 5.4 Additional information:

Avoid inhaling gases, fumes, dust, mist, vapor and aerosols.

Avoid contact with skin, eyes and clothing.

## 6 Accidental release measures

### 6.1 Personal precautions, protective equipment and emergency procedures:

Ensure adequate ventilation.

Ensure air handling systems are operational.

### 6.2 Environmental precautions:

Should not be released into the environment.

Prevent from reaching drains, sewer or waterway.

### 6.3 Methods and material for containment and cleaning up:

Wear protective eye wear, gloves and clothing.

### 6.4 Reference to other sections: None

## 7 Handling and storage

### 7.1 Precautions for safe handling:

No expected hazards under normal use condition.

Avoid breathing mist or vapor if aerosolized.

Do not eat, drink, smoke or use personal products when handling chemical substances.

### 7.2 Conditions for safe storage, including any incompatibilities:

Store in a cool, well-ventilated area.

### 7.3 Specific end use(s):

No additional information.

Effective date: 11 May 2020  
 Trade Name: Alconox®

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**8 Exposure controls/personal protection**



**8.1 Control parameters:**

- a) 7722-88-5, Tetrasodium Pyrophosphate, ACGIH TWA 10 mg/m<sup>3</sup>
- b) 7758-29-4, Sodium Tripolyphosphate, ACGIH TWA 10 mg/m<sup>3</sup>
- c) Dusts, non-specific OEL, Irish Code of Practice
  - (i) Total inhalable 10 mg/m<sup>3</sup> (8hr)
  - (ii) Respirable 4 mg/m<sup>3</sup> (8hr)
  - (iii) Tetrasodium Pyrophosphate, OSHA TWA 5 mg/m<sup>3</sup>, (8hr)

**8.2 Exposure controls**

**Appropriate engineering controls:**

Emergency eye wash fountains and safety showers should be available in the immediate vicinity of use or handling.

**Respiratory protection:**

Not needed under normal use conditions.

**Protection of skin:**

Select glove material impermeable and resistant to the substance.

**Eye protection:**

Safety goggles or glasses, or appropriate eye protection. Recommended to comply with ANSI Z87.1 and/or EN 166.

**General hygienic measures:**

- Wash hands before breaks and at the end of work.
- Avoid contact with skin, eyes and clothing.

**Exposure Control and Personal Protective Equipment at recommended dilution:**

Under normal use and operational conditions, no special personal protective equipment or engineering controls will be necessary. Handle with care.

**9 Physical and chemical properties**

<b>Appearance (physical state, color):</b>	White and cream colored flakes - powder	<b>Explosion limit lower:</b> <b>Explosion limit upper:</b>	Not determined or not available. Not determined or not available.
<b>Odor:</b>	Not determined or not available.	<b>Vapor pressure at 20°C:</b>	Not determined or not available.
<b>Odor threshold:</b>	Not determined or not available.	<b>Vapor density:</b>	Not determined or not available.
<b>pH-value:</b>	9.5 (1% aqueous solution)	<b>Relative density:</b>	Not determined or not available.

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<b>Melting/Freezing point:</b>	Not determined or not available.	<b>Solubilities:</b>	Not determined or not available.
<b>Boiling point/Boiling range:</b>	Not determined or not available.	<b>Partition coefficient (n-octanol/water):</b>	Not determined or not available.
<b>Flash point (closed cup):</b>	Not determined or not available.	<b>Auto/Self-ignition temperature:</b>	Not determined or not available.
<b>Evaporation rate:</b>	Not determined or not available.	<b>Decomposition temperature:</b>	Not determined or not available.
<b>Flammability (solid, gaseous):</b>	Not determined or not available.	<b>Viscosity:</b>	a. Kinematic: Not determined or not available. b. Dynamic: Not determined or not available.
<b>Density at 20°C:</b>	Not determined or not available.		

## 10 Stability and reactivity

- 10.1 Reactivity:** Not determined or not available.  
**10.2 Chemical stability:** Not determined or not available.  
**10.3 Possibility hazardous reactions:** Not determined or not available.  
**10.4 Conditions to avoid:** Not determined or not available.  
**10.5 Incompatible materials:** Not determined or not available.  
**10.6 Hazardous decomposition products:** Not determined or not available.

## 11 Toxicological information

### 11.1 Information on toxicological effects:

#### Acute Toxicity:

##### Oral:

: LD50 > 5000 mg/kg oral rat - Product.

**Chronic Toxicity:** No additional information.

#### Skin corrosion/irritation:

Sodium Alkylbenzene Sulfonate: Causes skin irritation.

#### Serious eye damage/irritation:

Sodium Alkylbenzene Sulfonate: Causes serious eye damage.

Tetrasodium Pyrophosphate: Risk of serious damage to eyes.

#### Product information at recommended dilution:

Eye irritation may occur upon direct contact with eyes. No specific hazards for skin contact, inhalation, or chronic exposure are expected within normal use parameters.

**Respiratory or skin sensitization:** No additional information.

**Carcinogenicity:** No additional information.

**IARC (International Agency for Research on Cancer):** None of the ingredients are listed.

**NTP (National Toxicology Program):** None of the ingredients are listed.

**Germ cell mutagenicity:** No additional information.

**Reproductive toxicity:** No additional information.

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**STOT-single and repeated exposure:** No additional information.

**Additional toxicological information:** No additional information.

**12 Ecological information**

**12.1 Toxicity:**

- Sodium Alkylbenzene Sulfonate: Fish, LC50 1.67 mg/l, 96 hours.
- Sodium Alkylbenzene Sulfonate: Aquatic invertebrates, EC50 Daphnia 2.9 mg/l, 48 hours.
- Sodium Alkylbenzene Sulfonate: Aquatic Plants, EC50 Algae 29 mg/l, 96 hours.
- Tetrasodium Pyrophosphate: Fish, LC50 - other fish - 1,380 mg/l - 96 h.
- Tetrasodium Pyrophosphate: Aquatic invertebrates, EC50 - Daphnia magna (Water flea) - 391 mg/l - 48 h.

**12.2 Persistence and degradability:** No additional information.

**12.3 Bioaccumulative potential:** No additional information.

**12.4 Mobility in soil:** No additional information.

**General notes:** No additional information.

**12.5 Results of PBT and vPvB assessment:**

- PBT:** No additional information.
- vPvB:** No additional information.

**12.6 Other adverse effects:** No additional information.

**13 Disposal considerations**

**13.1 Waste treatment methods (consult local, regional and national authorities for proper disposal)**

**Relevant Information:**

It is the responsibility of the waste generator to properly characterize all waste materials according to applicable regulatory entities. (US 40CFR262.11).

**14 Transport information**

<b>14.1 UN Number:</b> ADR, ADN, DOT, IMDG, IATA	None																
<b>14.2 UN Proper shipping name:</b> ADR, ADN, DOT, IMDG, IATA	None																
<b>14.3 Transport hazard classes:</b> ADR, ADN, DOT, IMDG, IATA	<table border="0"> <tr> <td><b>Class:</b></td> <td>None</td> </tr> <tr> <td><b>Label:</b></td> <td>None</td> </tr> <tr> <td><b>LTD. QTY:</b></td> <td>None</td> </tr> </table>	<b>Class:</b>	None	<b>Label:</b>	None	<b>LTD. QTY:</b>	None										
<b>Class:</b>	None																
<b>Label:</b>	None																
<b>LTD. QTY:</b>	None																
<hr/> <table border="0"> <tr> <td><b>US DOT</b></td> <td></td> </tr> <tr> <td><b>Limited Quantity Exception:</b></td> <td>None</td> </tr> <tr> <td><b>Bulk:</b></td> <td><b>Non Bulk:</b></td> </tr> <tr> <td><b>RQ (if applicable):</b> None</td> <td><b>RQ (if applicable):</b> None</td> </tr> <tr> <td><b>Proper shipping Name:</b> None</td> <td><b>Proper shipping Name:</b> None</td> </tr> <tr> <td><b>Hazard Class:</b> None</td> <td><b>Hazard Class:</b> None</td> </tr> <tr> <td><b>Packing Group:</b> None</td> <td><b>Packing Group:</b> None</td> </tr> <tr> <td><b>Marine Pollutant (if applicable):</b> No additional information.</td> <td><b>Marine Pollutant (if applicable):</b> No additional information.</td> </tr> </table>		<b>US DOT</b>		<b>Limited Quantity Exception:</b>	None	<b>Bulk:</b>	<b>Non Bulk:</b>	<b>RQ (if applicable):</b> None	<b>RQ (if applicable):</b> None	<b>Proper shipping Name:</b> None	<b>Proper shipping Name:</b> None	<b>Hazard Class:</b> None	<b>Hazard Class:</b> None	<b>Packing Group:</b> None	<b>Packing Group:</b> None	<b>Marine Pollutant (if applicable):</b> No additional information.	<b>Marine Pollutant (if applicable):</b> No additional information.
<b>US DOT</b>																	
<b>Limited Quantity Exception:</b>	None																
<b>Bulk:</b>	<b>Non Bulk:</b>																
<b>RQ (if applicable):</b> None	<b>RQ (if applicable):</b> None																
<b>Proper shipping Name:</b> None	<b>Proper shipping Name:</b> None																
<b>Hazard Class:</b> None	<b>Hazard Class:</b> None																
<b>Packing Group:</b> None	<b>Packing Group:</b> None																
<b>Marine Pollutant (if applicable):</b> No additional information.	<b>Marine Pollutant (if applicable):</b> No additional information.																

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Trade Name: Alconox®

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<b>Comments:</b> None	<b>Comments:</b> None
<b>14.4 Packing group:</b> ADR, ADN, DOT, IMDG, IATA	None
<b>14.5 Environmental hazards:</b>	None
<b>14.6 Special precautions for user:</b> <b>Danger code (Kemler):</b> <b>EMS number:</b> <b>Segregation groups:</b>	None None None None
<b>14.7 Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code:</b> Not applicable.	
<b>14.8 Transport/Additional information:</b>  <b>Transport category:</b> <b>Tunnel restriction code:</b> <b>UN "Model Regulation":</b>	
	None None None

**15 Regulatory information**

**15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture.**

**North American**

<b>SARA</b> <b>Section 313 (specific toxic chemical listings):</b> None of the ingredients are listed. <b>Section 302 (extremely hazardous substances):</b> None of the ingredients are listed.
<b>CERCLA (Comprehensive Environmental Response, Clean up and Liability Act) Reportable</b> <b>Spill Quantity:</b> None of the ingredients are listed.
<b>TSCA (Toxic Substances Control Act):</b> <b>Inventory:</b> All ingredients are listed as active. <b>Rules and Orders:</b> Not applicable.
<b>Proposition 65 (California):</b>  <b>Chemicals known to cause cancer:</b> None of the ingredients are listed. <b>Chemicals known to cause reproductive toxicity for females:</b> None of the ingredients are listed. <b>Chemicals known to cause reproductive toxicity for males:</b> None of the ingredients are listed. <b>Chemicals known to cause developmental toxicity:</b> None of the ingredients are listed.

<b>Canadian</b> <b>Canadian Domestic Substances List (DSL):</b> All ingredients are listed.
---

**EU**

<b>REACH Article 57 (SVHC):</b> None of the ingredients are listed.
---

Effective date: 11 May 2020  
Trade Name: Alconox®

Revision: 11 May 2020

**Germany MAK:** Not classified.

**EC 648/2004** – This is an industrial detergent. Contains >30% phosphate, 15-30% anionic surfactant, <5% EDTA salts

**EC 551/2009** – This is not a laundry or dishwasher detergent

**EC 907/2006** – Contains no enzymes, optical brighteners, perfumes, allergenic fragrances, or preservative agents

## Asia Pacific

### Australia

**Australian Inventory of Chemical Substances (AICS):** All ingredients are listed.

### China

**Inventory of Existing Chemical Substances in China (IECSC):** All ingredients are listed.

### Japan

**Inventory of Existing and New Chemical Substances (ENCS):** All ingredients are listed.

### Korea

**Existing Chemicals List (ECL):** All ingredients are listed.

### New Zealand

**New Zealand Inventory of Chemicals (NZOIC):** All ingredients are listed.

### Philippines

**Philippine Inventory of Chemicals and Chemical Substances (PICCS):** All ingredients are listed.

### Taiwan

**Taiwan Chemical Substance Inventory (TSCI):** All ingredients are listed.

## 16 Other information

**Abbreviations and Acronyms:** None

### Summary of Phrases

**Hazard statements:**

H315 Causes skin irritation.  
H318 Causes serious eye damage.

**NFPA:** 1-0-0

**HMIS:** 1-0-0

**At recommended dilution:**

**NFPA:** 1-0-0

**HMIS:** 1-0-0

**Precautionary statements:**

P264 Wash skin thoroughly after handling.  
P280 Wear protective gloves/protective clothing/eye protection/face protection.  
P302+P352 If on skin: Wash with soap and water.  
P305+P351+P338 If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do. Continue rinsing.  
P321 Specific treatment (see supplemental first aid instructions on this label).  
P332+P313 If skin irritation occurs: Get medical advice/attention.  
P362 Take off contaminated clothing and wash before reuse.  
P501 Dispose of contents and container as instructed in Section 13.

**Manufacturer Statement:**

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

## **Attachment F: OnX Map**



Search



Map Layers



Offline Maps



My Content



My Account & Settings



My Account

Settings

Elite Benefits

Invite Friends

Print

Chip Updater

Tools



E Abriendo Ave

Elm St

S Santa Fe Ave

Mahien Ave

Egan Ave

E Mesa Ave

85

25

128

84

128

DU-0033

DU-0035

DU-0032

DU-0031

CITY OF PUEBLO

BISHOP OF PUEBLO A CORP SOLE ST ANN

1100 SOUTH SANTA FE LLC

1000 SOUTH SANTA FE LLC

CHAZAN LOUIS ZACKARY

ARAGON SHERRY

ORTIZ JOANN + LOUISE

GARNER LONNIE JR

ALVES DENISE + RAYMOND II

CALIGARIS JOHN D + ROBERT H

GONZALES ROBERTA A

PUEBLO ELECTRICS INC

KESHMIRI HAMID

VANDER VALK HARRIC

VANDER VALK HARRIC A

VANDER VALK GORDON A

MONTAJO CHARLES J III

DAVIS ROBERT H

E Arroyo Ave

HORVAT FRANCES M

MIKETA GREG E + FRED E

COPELAND ANNETTE E

CHAVEZ RICHARD A

MAJOR MATILDA MUTZ

LAVE ERNEST S

BURWELL MICHAEL JOHN

ABEYTA EPIFANIA LIFE ESTATE + STEV

ARELLANO LORIE

CHRISTENSEN CASSIE

SHEETS LILLIAN D

MONTANO JANIE A

DOMINA RENEE L

GALICH ALBERT L

MONTAJO SADIE

REDINGER DONNA J

ACEVEDO MARCO

SUAZO AARON K + KARLA J

KUHN RYAN C + GREGORY J

BRANDT MICHAEL S + RUTH H

ALCALA MANUEL

MARTINEZ ANGEL C

LUCERO GABRIEL S

38°

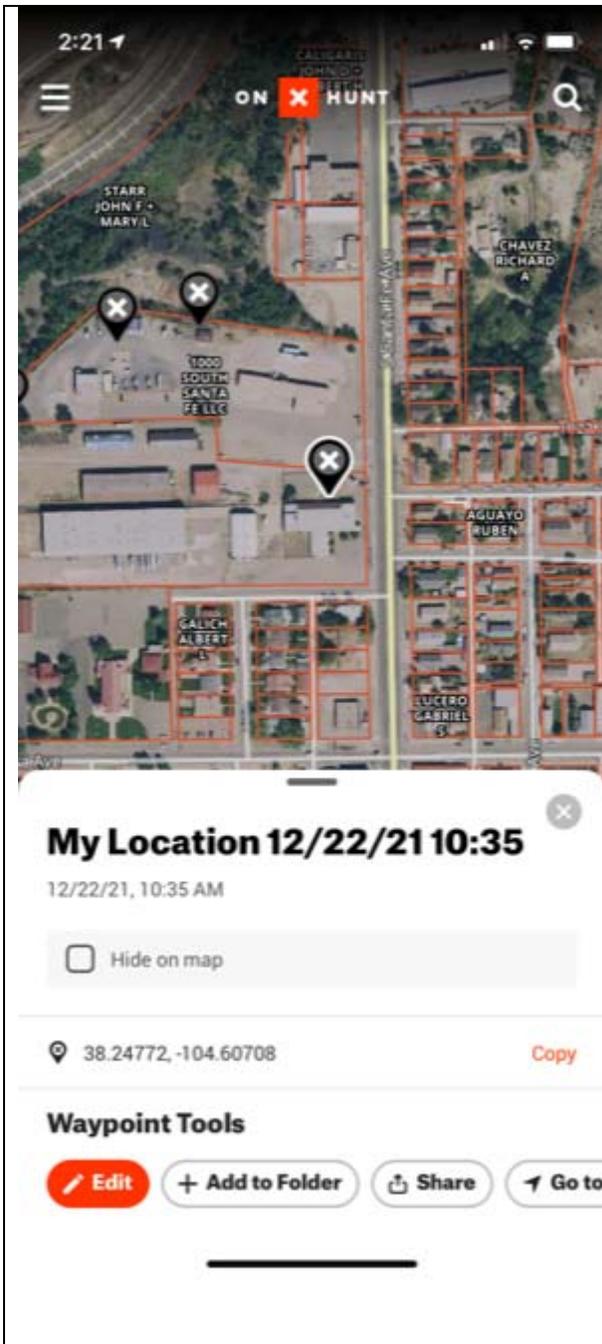
4 mph ESE

200 ft

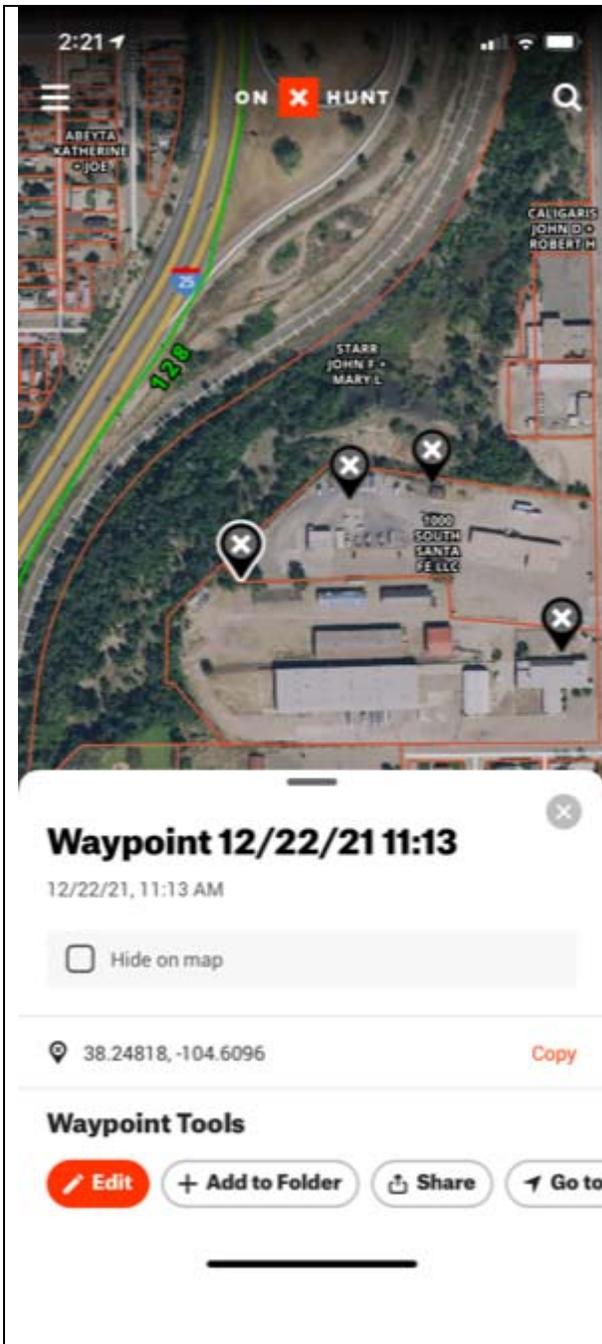
38.25018, -104.61305

mapbox

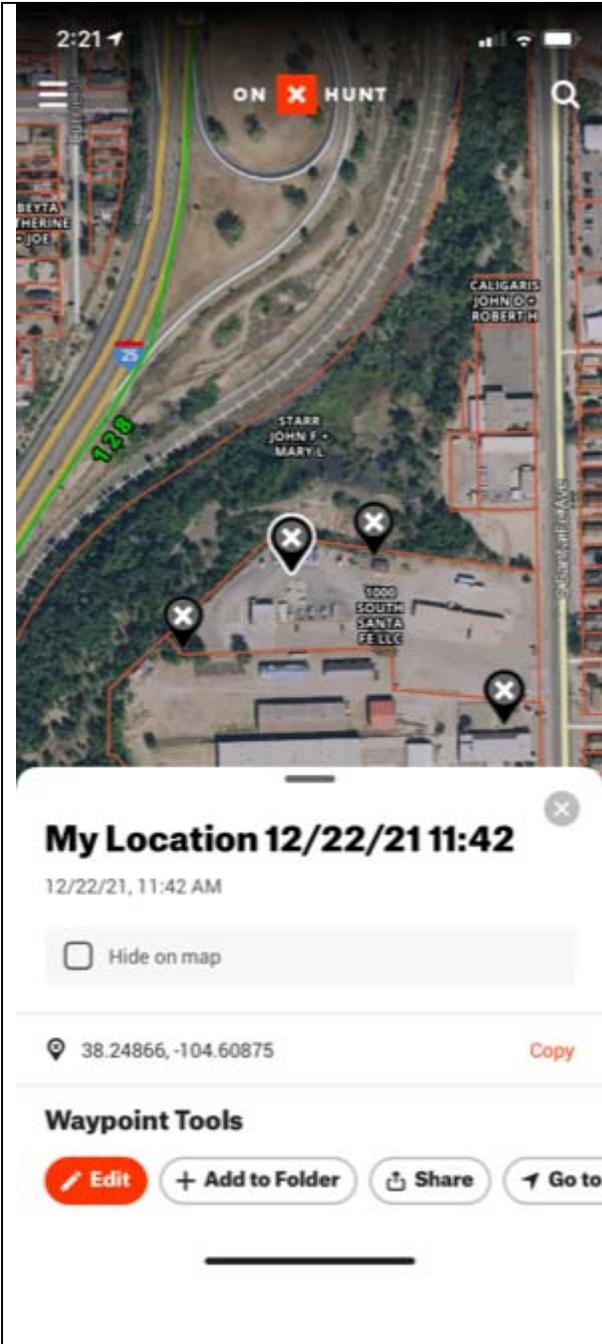
## **Attachment G: OnX Latitude/Longitude Pictures**



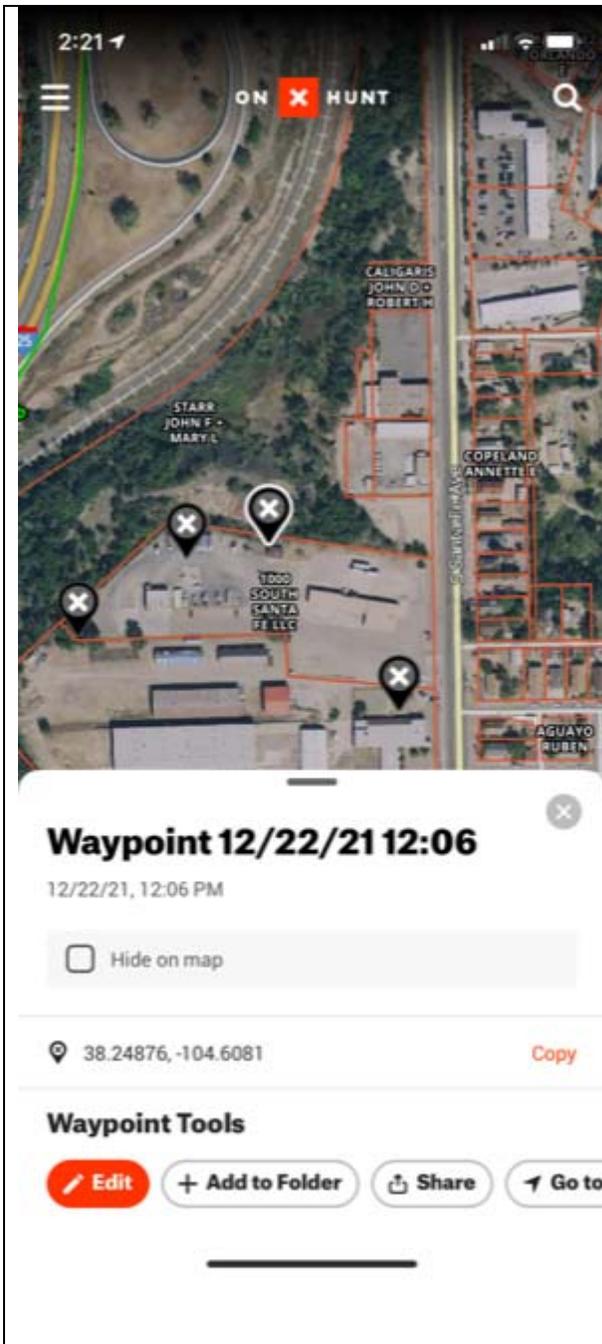
DU-0031



DU-0032



DU-0033

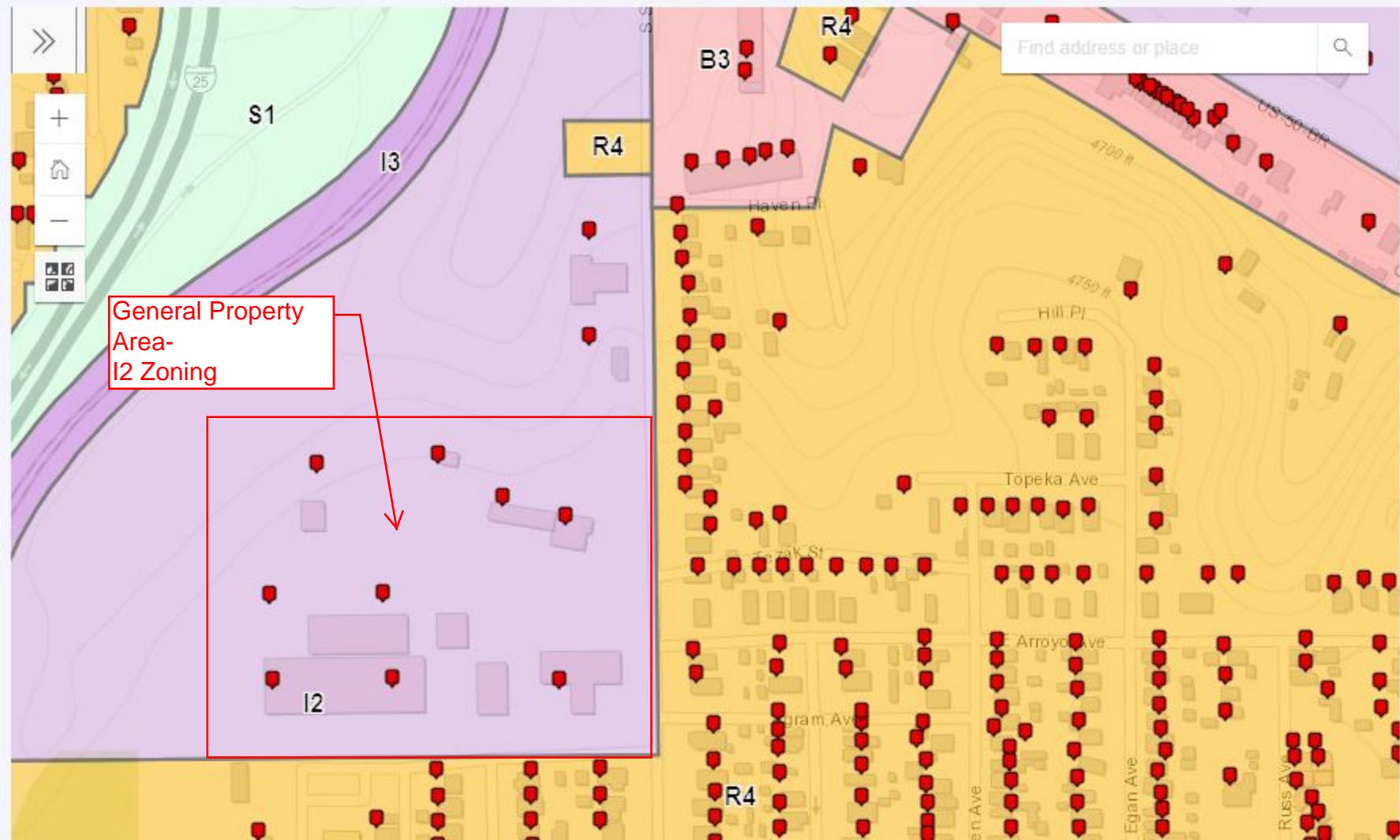


DU-0035

## **Attachment H: Zoning Map and Description**

# ZONING DISTRICT MAP

This map reflects zoning districts and provides links to the PDF fact sheets.



**Zone District: I-2 (Industrial District)**

Purpose. The standards of this district (I-2) are designed to retain and provide areas for the manufacture, warehousing and limited retailing of products which by their inherent characteristics and the operations involved are not obnoxious to one another or surrounding uses.

Setbacks: Front: 0' Side: 5'\* Rear: 15'\*

\* Does not apply on the portion of the parcel adjacent to another parcel also in a business or Industrial zone. It does apply when the portion of the parcel is adjacent to a residential or special zone (streets and alleys not considered.).

Coverage: 100%  
 Floor Area Ratio: 1  
 Max. Height: Unlimited (See Section 17-4-6 for additional setbacks required for structures over 35' in height)  
 Minimum Lot Width: 50'  
 Minimum Lot Size: 10,000 Square Feet

**PERFORMANCE STANDARDS:**

**Sec. 17-4-5. Schedule of District Regulations (Part IV, Nonresidential).**

The applicant shall submit proof that he or she can or will meet the applicable performance standards listed in Section 17-4-5.

**Outdoor Lighting:** § 17-4-52 Outdoor Lighting Performance Standards.

**Off Street Parking:** § 17-4-43 Off-street parking non-residential.

**Landscape:** Required. § 17-4-7

**Public Sidewalks:** § 17-4-44

**Permitted Uses** § 17-4-51(c)

**Uses by right.**

- |                                      |   |                                    |
|--------------------------------------|---|------------------------------------|
| 1. Dog care facility                 | 18. Automobile repair, body shop              | 35. Trucking terminal              |
| 2. Kennel (cattery)                  | 19. Automobile repair, lube shop              | 36. Mineral springs                |
| 3. Veterinary clinic                 | 20. Automobile repair, repair shop            | 37. Contractor's shop              |
| 4. Racetrack                         | 21. Gas station                               | 38. Contractor's yard              |
| 5. Recreation facilities, general    | 22. Retail sales, auto parts                  | 39. Storage facility, outdoor      |
| 6. Recreation facilities, indoor     | 23. Retail sales, tires                       | 40. Storage facility, self-storage |
| 7. Theater, drive-in                 | 24. Artist studio                             | 41. Wholesaling uses               |
| 8. Rental shop, equipment            | 25. Broadcasting studio                       | 42. Refuse collection company      |
| 9. Rental shop, general              | 26. Food and drink processing facility, minor | 43. Auction house                  |
| 10. Repair shop, consumer items      | 27. Microbrewery                              | 44. Exterminator                   |
| 11. Repair shop, durable goods       | 28. Batch plant                               | 45. Taxidermist                    |
| 12. Retail sales, building materials | 29. Manufacturing and production              | 46. Tree service                   |
| 13. Car wash                         | 30. Woodworking                               | 47. Parking lot                    |
| 14. Laundry service                  | 31. Tow service                               | 48. Public utilities               |
| 15. Print shop                       | 32. Truck parking                             | 49. Equestrian event facilities    |
| 16. Automobile dealership            | 33. Truck sales and service                   | 50. Accessory community garden     |
| 17. Automobile rental                | 34. Truck stop                                | 51. Accessory emergency generator  |

**Uses by review.**

- |                                 |   |                                   |
|---------------------------------|---|-----------------------------------|
| 1. Bar, tavern                  | 15. Laboratory                                | 29. Airport, private              |
| 2. Brewpub                      | 16. Commissary                                | 30. Instructional studio          |
| 3. Catering service             | 17. Food and drink processing facility, major | 31. Charitable institution        |
| 4. Restaurant                   | 18. Recreational vehicle, sales and service   | 32. Parks, trails and open space  |
| 5. Restaurant, carry-out        | 19. Tow yard                                  | 33. Community center              |
| 6. Smoking lounge               | 20. Natural deposits, extraction              | 34. Sign, billboard               |
| 7. Shooting range               | 21. Natural deposits, processing              | 35. Wind Turbine                  |
| 8. Flea market                  | 22. Recycling center                          | 36. Farming or ranching           |
| 9. Mobile home sales            | 23. Recycling collection center               | 37. Nursery                       |
| 10. Pawnshop                    | 24. Recycling processing facility             | 38. Accessory commissary          |
| 11. Retail sales, garden center | 25. Salvage yard                              | 39. Accessory composting facility |
| 12. General service             | 26. Solid wastes transfer station             | 40. Accessory drive-thru          |
| 13. Automobile auction          | 27. Residence, watchman or caretaker          | 41. Temporary carnival            |
| 14. Civic club                  | 28. Parking structure                         | 42. Commercial, established       |

**Conditional uses:**

- |  |  |                                       |
|--|--|---------------------------------------|
| 1. Retail marijuana testing facility               | 7. Retail marijuana cultivation facility         | 14. Accessory solar array             |
| 2. Pawnshop, automobile                            | 8. School, trade                                 | 15. Temporary construction yard       |
| 3. Food warehousing                                | 9. Tower (Antenna)                               | 16. Temporary mobile auto repair      |
| 4. Retail marijuana product manufacturing facility | 10. Community garden                             | 17. Temporary mobile food vendor      |
| 5. Warehousing uses                                | 11. Accessory antenna                            | 18. Temporary outdoor sales, seasonal |
| 6. Development in floodplain                       | 12. Accessory commercial patio                   | 19. Legal non-conforming uses         |
|  | 13. Accessory medical marijuana home cultivation |                                       |

## Attachment #12 – Timeline for the Brown property – OU2 site

### 1960s and 1970s

#### 1969

A landowner who purchased contaminated property long ago would not be held to as stringent an environmental assessment standard as would a current purchaser. *United States v. Serafini*, 706 F. Supp. 346 (M.D. Pa. 1988) (court denied the government summary judgment because it failed to show that defendant's actions were "inconsistent with good commercial customary practices" although the defendant purchasers had made no inquiry into past or current uses of the landfill and waste disposal site when they bought it in 1969.)

<https://law.justia.com/cases/federal/district-courts/FSupp/706/346/1588633/>

#### 1970s

During the 1970s the Minnequa Industrial Park, located between Interstate Highway 25 and the slag pile originating from the steel production of Colorado Fuel and Iron Corp (CF&I), was developed by a subsidiary organization of CF&I, and according to the design engineer for development of the property, there was no active search for or concern over the presence of hazardous substances.

Attachment #2: 12-16-21 RSams to CBrown Ltr re South Santa Fe Ave Pueblo CO Property.pdf

#### 1963 - 1982

In 1963, Cecil Brown began working for a tenant on the property, first as the District Manager of SoCo for Ryder Truck Rental, and then as owner of Alpine Truck Rental.

From 1963 to 1982 (nineteen years) Cecil Brown managed both Ryder Truck Rental and Alpine Truck Rental, and worked with the owner of the property. He became well acquainted with the owners and tenants of other nearby properties.

From 1963 to 1971 (eight years), while Cecil Brown was working on the property, he saw the nearby Catholic school (i.e., the St. Mary's School) in session, with a playground for the students. The St. Mary's School was closed in 1971 due to financial problems the Catholic church was experiencing.

[http://www.historitecture.com/pdf/bojon\\_town\\_context.pdf](http://www.historitecture.com/pdf/bojon_town_context.pdf)

### 1980s

#### 1980

December 11, 1980 was the effective date of the 1980 Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

#### August 31, 1982 and August 20, 1986

These are the dates that Cecil H. Brown and Beverly Ann Brown purchased the property:

-On August 31, 1982 Cecil H. Brown and Beverly Ann Brown purchased the property located at 1045-1049 South Santa Fe Avenue (4 acres).

-On August 20, 1986 Cecil H. Brown and Beverly Ann Brown purchased the property located at 1103 South Santa Fe Avenue (8 acres)." (bolded revisions added)

There were no slag piles located on the property. There were slag piles located on other nearby properties. No one expressed concerns about the property or the slag piles located on other

nearby properties. Specifically, the owner of the property, the employees of Ryder Truck Rental and Alpine Truck Rental, the other tenants on the property and the owners and tenants of other nearby properties did not express concerns about the property or the slag piles located on other nearby properties.

Cecil Brown was aware of the smelter, just like everyone was, but there was not an awareness of potential contamination. Simply seeing slag piles did not automatically trigger concern regarding hazardous substances as Roger J. Sams, P.E., pointed out in his December 16, 2021 letter.

Prior to 1982, Cecil Brown's largest customer, Meadow Gold Dairies, was also a tenant on the property and continued to be a tenant after his purchase of the property. Cecil Brown's purchase of the property in 1982 was done via an option that Meadow Gold Dairies had to purchase the 4-acre parcel and Meadow Gold Dairies passed that option to Cecil Brown. An aerial photo map taken in 1983 illustrates the clean, well-maintained appearance of the property.

Attachment #9 – 1983 Aerial Photo Map of Property.pdf

October 17, 1986

October 17, 1986 is the effective date of the 1986 amendments to CERCLA.

1988

United States Environmental Protection Agency (EPA). (1988, October). "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA." EPA/540/G-89/004.

September 26, 1989

The EPA website for the Superfund Site: Colorado Smelter, Pueblo, CO, Cleanup Activities states: "**The potential for contamination at the Colorado Smelter site was discovered during an earlier inspection of the Santa Fe Bridge Culvert site, which began a series of investigations in the early 1990s** and continues today." (bolded emphasis added)

Attachment #1: 12-16-21 EPA website – Superfund Site – Colorado Smelter Pueblo, CO Cleanup Activities – Background.pdf

The January 31, 2013 article entitled "Guilty Knowledge – PULP's three month investigation into pollution at the old Colorado Smelter Site" states: "Part One ...

2. Study of the site – How it all started

1989: Red Discharge in the Arkansas and the Pueblo County Health Department

Scientific attention was originally directed at the region near sites of Pueblo's old smelters in 1989 when a concerned citizen reported, to the Pueblo County Health Department, seeing a red-orange discharge into the Arkansas River coming from an eighteen inch culvert. This culvert extends from the levee on the south side of the Arkansas River, directly below the Santa Fe Avenue Bridge. **Pueblo County proceeded to collect a grab sample of the discharge on September 26, 1989.** Results of the first samples confirmed that there were in fact elevated concentrations of several metals in the flow coming from the Santa Fe Bridge culvert. This information was reported to the CDPHE.

(bolded emphasis added)

<https://puebloupulp.com/131guilty-knowledge-pulps-three-month-investiation-into-pollution-at-the-old-colorado-smelter-site/>

12-12-18, USEPA, Revision 0, Uniform Federal Policy Quality Assurance Project Plan for OU2 Remedial Investigation at Colorado Smelter.

Page 9/532: Investigation of the Colorado Smelter started in 1989 when a citizen reported a colored discharge from a culvert on the south side of the Arkansas River below the Santa Fe Avenue Bridge (i.e., the Santa Fe Bridge Culvert). The initial sample collected at this location by Pueblo County Health Department showed elevated levels of iron and other metals. It is possible that discharge from the culvert is groundwater discharge from the OU2 Site.

12-07-20 Draft USEPA – Technical Memorandum, Operable Unit 2 Surficial Soil Data Summary, Colorado Smelter Superfund Site, Pueblo, Pueblo County, Colorado.

Page 7/58, 2.0 Site Description, History, and Previous Investigations, last paragraph, to Page 8/58, first paragraph: Investigation of the Colorado Smelter started in 1989 when a citizen reported a colored discharge from a culvert on the south side of the Arkansas River below the Santa Fe Avenue Bridge (i.e., the Santa Fe Bridge Culvert). The initial sample collected at this location by Pueblo County Health Department showed elevated levels of iron and other metals.

## 1990s

### 1991

1991: A Preliminary Assessment of Pueblo and a History of Smelting

A preliminary assessment of the geology, climate, wildlife, ecosystems, population, and history of Pueblo near the Santa Fe Bridge culvert area was compiled by the CPDHE in 1991, preceding further sampling and inspection. CDPHE discovered that six smelters had operated in the vicinity of the Santa Fe Bridge culvert between 1878 and 1921. The sites of these old smelters would become target for dangerous metals research.

(bolded emphasis added)

<https://pueblopulp.com/131guilty-knowledge-pulps-three-month-investiation-into-pollution-at-the-old-colorado-smelter-site/>

### 1993

The first American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-93) was published in 1993.

<https://www.bbgroup.com/blog/the-astm-e1527-phase-i-environmental-site-assessment-esa-standard-a-look-back-part-one>

### 1994

In 1994 Cecil H. Brown contracted with McGlothlin and Associates, Inc., environmental consultants, to monitor and observe the removal of four above ground fuel tanks on his property located at 1045 ½ S. Santa Fe Avenue, Pueblo, Colorado, using all appropriate processes to do that safely and testing to remediate any concerns. The October 1, 1994 Above Ground Tank (AGT) Closure Report has TCLP testing analytical results from two soil samples that would not warrant remediation (e.g., cleanup or asphalt capping) of the property.

Attachment #3: 10-01-94 AGT Closure Report – Pages 1-13 of 87.pdf

Attachment #4: 10-01-94 AGT Closure Report – Pages 46-47 of 87.pdf

## 1994 - 1995

### Potential for Contamination at the Colorado Smelter Site Discovered in 1989

#### 1994 -1995: A First Stab at Sampling and Analyzing First Field Research

In 1994, samples of soil were first collected from the sites of Pueblo's historic smelter activity, including the Colorado Smelter, and sampled once again after the first results were released by the CDPHE, which raised alarm when each of the 33 samples collected reported levels of Arsenic exceeding the EPA's threshold for cancer risk to humans."

<https://pueblopulp.com/131guilty-knowledge-pulps-three-month-investigation-into-pollution-at-the-old-colorado-smelter-site/>

12-07-20 Draft USEPA – Technical Memorandum, Operable Unit 2 Surficial Soil Data Summary, Colorado Smelter Superfund Site, Pueblo, Pueblo County, Colorado.

Previous data collected by the CDPHE in 1994 (CDPHE, 1995) and EPA contractors in 1995 (Ecology and Environment [E&E], 1995) indicated the presence of elevated levels of lead and arsenic; however, the studies were not systematic and lacked sufficient data density to clearly determine if metals posed a significant threat to human health and the environment.

12-12-18, USEPA, Revision 0, Uniform Federal Policy Quality Assurance Project Plan for OU2 Remedial Investigation at Colorado Smelter.

Page 9/532:

Historical data that were collected by the CDPHE in 1994 and EPA contractors in 1995 indicated the presence of elevated levels of lead and arsenic on the OU2 Site.

## 1997

According to a review of over 150 published studies on slag (i.e., Piatak, N.M., Parsons, M.B., Seal II, R.R., 2015. Characteristics and environmental aspects of slag: A review. Applied Geochemistry 57, 236-266.), the first scientific article regarding environmental hazards caused by silver and lead smelter slags was published in 1997 (i.e., Manz, M., Castro, L.J., 1997. The environmental hazard caused by smelter slags from the Sta. Maria de la Paz mining district in Mexico: Environmental Pollution 98, 7-13.).

Attachment #10: June 2015 - Applied Geochemistry 57 - Characteristics and environmental aspects of slag - A review

From 1982 to 1986, when Cecil Brown purchased the property, it does not appear that there were any published characterization studies on slag from silver and lead smelters. The 1997 publication occurred after Cecil Brown purchased the property in 1982 and 1986, and before the EPA listed the Colorado Smelter site on the National Priorities List in December 2014. At the time Cecil H. Brown bought the property no one was concerned about the potential for contamination at the Colorado Smelter Superfund Site.

## **2000s**

### 2005

On December 8, 2005 Beverly Ann Brown died. She was the wife of Cecil Brown.

Attachment #6: 05-05-06 District Court, El Paso County, CO, Case No. 06PR440, Letters Testamentary for Estate of BABrown.pdf

## 2006

[November 1, 2006](#) is the effective date of EPA's All Appropriate Inquiries Final Rule, which establishes specific requirements for the "all appropriate inquiries" that are necessary to establish the landowner defenses under CERCLA.

## **2010s**

### June 2011

12-07-20 Draft USEPA – Technical Memorandum, Operable Unit 2 Surficial Soil Data Summary, Colorado Smelter Superfund Site, Pueblo, Pueblo County, Colorado.

Page 8/58, third paragraph: The 2010 Analytical Results Report (CDPHE, 2011) based on data collected by CDPHE in 2010 provided the most recent data for the Site and helped determine the initial scope of this RI. ... In 2010, CDPHE collected 434 surface soil samples from 47 yards in the Eilers and Bessemer residential neighborhoods surrounding the Colorado Smelter, including the old slag pile area and two background locations (CDPHE, 2011). The former smelter site consists of an approximate 700,000 square foot slag pile that is 30 feet high in places and lead and arsenic contaminated residential soils. The lead levels measured using x-ray fluorescence spectrophotometry (XRF) on composite samples of residential soils collected from the area south and east of the former smelter ranged from 300 to 785 parts per million (ppm). The lead benchmark that EPA and CDPHE set to protect human health is 400 ppm. Arsenic concentrations varied from 100 to 340 ppm range in an area immediately south of the former smelter site. Arsenic cleanup levels have ranged from 40 to 70 ppm at similar sites in Region 8. Lead levels in the slag pile ranged from 478 to 26,500 ppm and arsenic ranged from 28 to 1,740 ppm as analyzed by inductively coupled plasma – mass spectrometer (ICP-MS) (CDPHE, 2011). XRF analysis of the slag pile samples observed lead levels ranging from 332 up to 11,928 ppm with arsenic levels ranging from 33 to 1,193 ppm (CDPHE, 2011). In addition, these concentrations are well above preliminary background levels designated for that field effort (47 ppm for lead and 15 ppm for arsenic).

Page 18/58:

[CDPHE, 2011](#). Analytical Results Report, Colorado Smelter, Pueblo, Colorado. CERCLIS: CON000802700. [June](#).

### November 1, 2011 and February 21, 2012

#### Cecil H. Brown Transferred Property to LLCs in 2011 and 2012

Page 3 of the December 2<sup>nd</sup> letter states: "properties were conveyed accordingly:

Parcel number 1501400002: from Cecil H. Brown to 1000 South Santa Fe LLC by deed dated [November 1, 2011](#), which deed was recorded in the Pueblo County Clerk's Office." [This is the 4 acre parcel that Cecil H. Brown purchased on August 31, 1982.]

"Parcel number 1501400003: from Cecil H. Brown to 1100 South Santa Fe LLC by deed dated [February 21, 2012](#), which deed was recorded in the Pueblo County Clerk's Office." [This is the 8 acre parcel that Cecil H. Brown purchased on August 20, 1986.]

Dan Brown is the son of Cecil H. Brown. This is Dan Brown's explanation of the LLC's:

"The LLC's are a technical transfer. It was not a sale. My father and mother owned the property jointly. When she passed, we had to settle her estate. Thus, the LLC's were created and both interests – my fathers and mother's – were transferred into the LLC's with my dad as the sole owner and manager. My dad's personal tax return includes both LLC's."

Steve Gaines, Counsel, Bryan Cave Leighton Paisner LLP, has provided a letter in which he summarizes the history behind the formation of the LLCs to hold the real property in Pueblo, Colorado that was initially acquired in the 1980's by Cecil Brown and his wife Beverly in joint ownership. In his letter to Cecil Brown, Steve Gaines stated "Obviously, you remained at least a 50% beneficial owner in all of this property and the primary manager of the property throughout this full period of ownership. Accordingly, there was never any transfer of the property for consideration that would have justified any sort of environmental review of the property."  
Attachment #7: 02-11-22 SGaines to CBrown Ltr re Pueblo Real Estate.pdf  
Attachment #8: SGaines, Bryan Cave Leighton Paisner LLP webpage.pdf

### June 2012

The [June 11, 2012 EPA](#) Region 8 Regional Administrator's letter to Colorado Governor John Hickenlooper stated that EPA is considering proposing the Colorado Smelter site in Pueblo, Colorado to the Superfund National Priorities List (NPL), EPA is seeking the concurrence of the State of Colorado on adding the Colorado Smelter site to the NPL, and EPA is requesting a written response to this letter.

<https://semsub.epa.gov/work/08/1570678.pdf>

### 2013

According to the [December 30, 2013 Pueblo Chieftain](#) article entitled "Residents want EPA to work quickly": "If City Council and the Pueblo County commissioners are going to ask that the Eilers neighborhood be part of a federal Superfund cleanup program, neighborhood residents want assurances it will be done as fast as possible, done thoroughly and at no cost to themselves. Those goals have been added to a draft letter addressed to Gov. John Hickenlooper -- the letter that federal Environmental Protection Agency officials have been urging city officials to write for more than 18 months. The Superfund process requires that Hickenlooper request the Eilers neighborhood be added to federal cleanup program. Council and the commissioners informally agreed earlier this month to request the listing. The Superfund listing is intended to clean up lead and arsenic contamination that's been found in the soil of houses and businesses in the South Side neighborhood. **Commission Chairman Terry Hart said a final draft of the letter -- including some of the additions requested by Eilers residents -- is being circulated among city and county officials and should be sent to governor's office in the next few days. The draft offered by Councilwoman Sandy Daff, whose District 4 includes Eilers, includes a list of requests from the neighborhood, including: A guarantee that business or homeowners will not have to pay the cost of removing contaminated soil from their property or restoring it. EPA officials have said the purpose of the Superfund program is to clean up contaminated areas at either government expense or by the responsible polluter.**" (bolded emphasis added)

<https://www.chieftain.com/story/lifestyle/health-fitness/2013/12/30/residents-want-epa-to-work/9167496007/>

According to the January 3, 2014 Denver Post editorial entitled "Seek Superfund status for Pueblo smelter": Pueblo City Council and Pueblo County Commissioners on [December 31, 2013](#) sent a letter to Colorado Governor Hickenlooper asking him to send a letter to the EPA in support of listing the old Colorado Smelter site on the EPA's NPL.

<https://www.denverpost.com/2014/01/03/seek-superfund-status-for-pueblo-smelter/>

## 2014

12-12-18, USEPA, Revision 0, Uniform Federal Policy Quality Assurance Project Plan for OU2 Remedial Investigation at Colorado Smelter.

Page 14/532: Review Previous Site Information and Data – Between August 2014 and May 2018, the technical project team reviewed relevant site historical information and data to develop a Baseline CSM for the Colorado Smelter Site.

12-07-20 Draft USEPA – Technical Memorandum, Operable Unit 2 Surficial Soil Data Summary, Colorado Smelter Superfund Site, Pueblo, Pueblo County, Colorado.

Page 7/58, last paragraph, to Page 8/58, first paragraph:

Subsequent study by CDPHE resulted in the Site being entered into the Comprehensive Environmental Response, Compensation, and Liability Information System database as the Santa Fe (Bridge) Culvert site, EPA ID# COD982572513. The Site was listed on the National Priorities List (NPL) on December 11, 2014 (EPA ID: CON000802700).

The EPA website for the Superfund Site: Colorado Smelter, Pueblo, CO, Cleanup Activities states: “The Colorado Smelter was a **silver and lead smelter** that operated in the Eilers and Bessemer neighborhoods from 1883 to 1908. EPA listed the site on the National Priorities List in December 2014 ...” (bolded emphasis added)

On December 11, 2014 EPA listed the Colorado Smelter site on the NPL.

[https://archive.epa.gov/epapages/newsroom\\_archive/newsreleases/f570ef55608b921385257da\\_b005771a9.html](https://archive.epa.gov/epapages/newsroom_archive/newsreleases/f570ef55608b921385257da_b005771a9.html)

### **Commercial Industrial Property Owners Believe They Are Not Liable**

Seven years ago EPA representatives told Cecil H. Brown that he was not liable for any costs. Other EPA representatives recently stated that this may have been miscommunication because EPA has chosen not to hold residential property owners liable, but EPA intends to hold commercial industrial property owners liable. Other commercial industrial property owners still believe they are not going to be liable for any costs. The commercial industrial property owners, including Cecil H. Brown, might have made different decisions if they had known they might be liable for costs.

## **2020s**

### 2020

12-07-20 Draft USEPA – Technical Memorandum, Operable Unit 2 Surficial Soil Data Summary, Colorado Smelter Superfund Site, Pueblo, Pueblo County, Colorado.

#### 1.1 Project Scope

Surficial soil sampling activities were conducted as prescribed in the Uniform Federal Policy on Quality Assurance Project Plans (QAPP), (EPA, 2002), for the OU2 Remedial Investigation at Colorado Smelter... Potential contamination was investigated in contaminated surficial soils (0-24 inches) within OU2 and outlying undeveloped areas of OU1 which will be considered part of OU2 using a phased approach of surficial sampling. A decision unit size of 1 acre was used for the 12 DU areas randomly selected outside of OU2 and six ½ acre DU areas inside of OU2 were sampled using 30 increments under the pilot study... Based on the low variability results of

the pilot study, the remaining 32 DU areas identified within OU2 were sampled as ½ acre DUs using 30 increments.

## 2021

### **Value of the Property is Based upon Income from Leases**

The recent appraisal for the 8-acre parcel indicates the value of the property is based upon rental income from leases at the market rate that is not negatively affected by the Colorado Smelter Superfund Site. The [September 14, 2021](#) Real Property Appraisal Report for 1103 S Santa Fe Ave, Pueblo, CO 81006 prepared by Andersen Appraisal, LLC, on page 9/83, states: “The subject property is located on the EPA Colorado Smelter Super Fund site. Consequently, the subject site should be tested for possible contamination through the EPA protocol (additional information is available on the EPA Colorado Smelter Super Fund website). The appraisal has been prepared with the required EPA soil inspection based on the Extraordinary Assumption that the condition or deficiency does not require repair or alteration. The affect on marketability from any stigma associated with the Colorado Smelter Super Fund study area are unknown at this time.

Although the subject property is located within the EPA designated Colorado Smelter Super Fund study area, the effects on marketability of the subject are unknown. However, the property is entirely encapsulated with asphalt, concrete, and road base materials. In addition, several existing tenant occupied commercial and industrial use properties are located within the immediate area with no apparent negative affects on rental income.”

Attachment #5: [09-14-21](#) Real Property Appraisal Report – 1103 S Santa Fe Ave, Pueblo, CO 81006 – Andersen Appraisal, LLC – Pages 1-9 of 83.pdf

Cecil H. Brown does not expect the value of the property to be affected by the Colorado Smelter Superfund Site because the value of the property is based upon rental income from leases at the market rate. Nothing indicates that the property would be more valuable if unpaved portions of the property were capped with asphalt.

## 2022

### **All-Phase Environmental Consultants, Inc. Soil Confirmation Investigation**

EPA has not proven that soil contamination is present at a level that would require remediation on the entire 12 acres of the property.

For Cecil Brown, All-Phase Environmental Consultants, Inc. (APEC) performed a soil confirmation investigation. APEC sample analytical results indicate there are elevated levels of lead and arsenic in some limited areas along the northern boundary of the property.

On December 22, 2021, APEC personnel collected soil samples at the four sampling sites on the property (labeled by EPA in March 2020 as DU-0031, DU-0032, DU-0033, and DU-0035) for which EPA’s sample analytical results were the highest for arsenic and lead. APEC had the soil samples they collected analyzed for arsenic and lead using the Metals - Inductively Coupled Plasma (ICP) test and the Toxicity Characteristic Leaching Procedure (TCLP) test. APEC’s findings include:

-APEC sample results indicate there are elevated levels of lead and arsenic in soils, specifically along the northern property boundary (DU-0032, DU-0033, DU-0035) when compared to current EPA RSLs for Lead and TCLP Lead, and the OU1 Site Specific Residential Soil Value for Arsenic, that has been established for the Colorado Smelter Superfund Site. It should be noted that the Property is not zoned, nor is it utilized, as residential. It is an industrial zoned property, specifically, I-2. Therefore, until a site-specific value is determined for the property and the

specific zoning/use type, it is speculative to indicate whether or not arsenic, specifically, is above RSLs.

-All arsenic samples were below the TCLP threshold of 5 mg/kg.

-The lead is elevated in all samples with the exception of DU-0031 (APEC Sample) and DU-0033 (APEC Sample).

-The only TCLP Lead exceedance was in sample DU-0032, at 25.2 mg/kg.

-Further investigation may be warranted in this area and/or remedial efforts may be necessary dependent upon site specific arsenic RSLs that have yet to be established. Delineation of the TCLP results will better define what area specifically needs to be "capped" by an impervious surface, however with the vast amount of EPA data, coupled with the APEC results, initial opinions are that DU-0032 (area 32) may be the highest/only priority. Furthermore, the remaining parcels, as a remedial solution, could operate under a Materials Management Plan and potentially "use restrictions" to ensure that human health is protected during any potential work on site, specifically underground digging (utility work, etc.) and from future development, other than industrial.

Attachment #11 – 02-14-22 APEC Soil Confirmation Investigation, Brown Property, Pueblo, CO 81006