



Axelson, John

From: Axelson, John
Sent: Friday, December 02, 2011 8:54 AM
To: Dwreath@Berexco.com
Cc: Lindblom, Steven; Burn, Diana
Subject: Cook Battery Release 121-09791
Attachments: Landfill list.pdf; 900Series 2-5-10.pdf; form19.pdf; Nov 30 2011 washington cty 094.JPG

Dana,

As discussed this morning, a Form 19 is required to be submitted within 10-days of the release for reportable spills > 5-bbls. Based on the pictures I looked at this appears to have been a substantial release. However, if you don't believe it was 5-bbls or more and you have some way to verify the volume, you can provide that information instead of the Form 19. Either way the release still needs to be properly cleaned up.

I've attached a pdf of the Form 19, a copy of the Series 900 rules and a list of disposal facilities in Colorado by County. For reporting requirements see Rule 906. For oily waste management see rule 907.e. As I mentioned, once all of the oily dirt has been removed, please collect at least one representative sample from the middle of the spill area to verify that contaminants of concern are below the Table 910-1 standards. At a minimum, analyze the sample for Total Petroleum Hydrocarbons – diesel range through oil range. Also, analyze for BTEX.

The landfills may require additional sampling of the waste to profile for acceptance. If you decide to take it to a landfill you might want to contact them first so you can get all of the samples you need at the same time. If you decide to land treat on location it will require submittal of a Form 27 with a detailed plan in accordance with rule 907.e.(2).

Please give me a call if you have any questions. Thank you for your attention to this matter.
Sincerely,

John Axelson, P.G.
Environmental Protection Specialist, Northeast Region
Colorado Oil & Gas Conservation Commission
Phone: 303-637-7178
Cell: 303-877-9964
Fax: 303-637-7179