



STATE OF
COLORADO

Lujan - DNR, Carlos <carlos.lujan@state.co.us>

Re: Coon Hollow 1

1 message

Lujan - DNR, Carlos <carlos.lujan@state.co.us>

Tue, Nov 19, 2013 at 10:27 AM

To: Naomi <naomi@maralexinc.com>

Naomi,

Sorry, I was out of the office since last Thursday. There is no need to send hard copies. COGCC will need the scanned copies of Form 27s, analytical reports, and additional attachments anyway to upload them to the database. I you sent a hard copy, that's fine as well but please make sure that what you send electronically all the information you are sending as hard copy. And you can send correspondence to the Rifle office (see my address below).

I will enter the Form 27 and generate a Remediation number to be used as a reference. I will add some comments or Conditions of Approval (COAs). For example, I noticed that you mention that Maralex is going to stockpile the material for 3 months to allow for bio-degradation to occur. First of all, probably no bio-degradation will occur during winter time. Micro-organisms will not be active because of the low temperatures. Second, For bio-degradation to occur, micro-organisms need oxygen, and a stockpile is not the appropriate way for providing oxygen throughout the whole volume of soil; Soil should be spread-out and landfarmed with landowner's approval (BLM?). Third, diesel is the heaviest of the GRO/DRO compounds and will take longer to bio-remediate. When was the pit excavated? Recently or during the summer?

Other than that, plan is OK. Since DRO is the only parameter that exceeds Table 910-1 values, I agree that it will suffice to sample for BTEX, GRO and DRO and skip PAHs, metals, and inorganics. On the other hand, Please take discrete samples of the bottom of the pit (not composite). Composite samples will be OK from the stockpile, as long as samples are taken at a sufficient depth (halfway the thickness of the stockpile - if the stockpile is 6 feet deep, please take the sample at 3 feet below surface).

Thanks,
Carlos

Carlos A. Luján, Ph.D

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Please consider the environment prior to printing this e-mail...

On Tue, Nov 19, 2013 at 9:34 AM, Naomi <naomi@maralexinc.com> wrote:

Hi Carlos,

I called yesterday to ask you if you'd like me to send the form 27 to you or to Denver. I didn't hear back from you, so I decided to send it to the address on the form. I am attaching a scanned copy of it to you in case you want to see it before it makes its way through the system.

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Naomi Azulai

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