

STATE OF  
COLORADO

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**Conditionally approved Form 27 - HRM Resources II LLC - Cowles 1 oil skim pit (Remediation #9053) API 05-121-05397**

1 message

**Young - DNR, Rob** <rob.young@state.co.us>

Thu, May 14, 2015 at 9:09 AM

To: Roger Hutson &lt;lrhutson@hrmres.com&gt;, aprohaska@hrmres.com, John Axelson - DNR &lt;john.axelson@state.co.us&gt;, OGCC EnviroScan - DNR &lt;dnr\_ogcc.enviroscan@state.co.us&gt;

Mr. Hutson,

Please find attached the conditionally approved Form 27 (Remediation #9053) for the Cowles 1 oil skim pit remediation. The following conditions of approval (COA) have been added to the Form 27:

Remove petroleum hydrocarbon and produced water impacted soils above Table 910-1 allowable concentrations per Rule 905. Document the disposition of soil impacted above Table 910-1 allowable concentrations. Collect a minimum of one (1) discrete confirmation soil sample from the base and a minimum of four (4) discrete soil samples from the sidewalls of the oil skim pit excavation to document that soils at the extent of the excavation meet the allowable concentrations listed in Table 910-1 for BTEX, TPH, EC, pH and SAR. Oil skim pit berm material can be used to backfill the oil skim pit excavation if it meets the Table 910-1 allowable concentrations for TPH. A minimum of three feet of cover material is required if the berm materials are above the Table 910-1 allowable concentrations for pH, EC and SAR. Collect a minimum of three (3) soil samples from the oil skim pit berm footprint to document that the pH, EC and SAR concentrations of the exposed surface soil comply with Table 910-1 allowable concentrations.

Following the removal of impacted materials, submit a report referencing remediation project #9053 to the COGCC northeast EPS, Rob Young, via email. The report should describe the oil skim pit excavation activities, include a soil sample analytical summary table comparing the soil sample analytical results to Table 910-1 allowable concentrations; analytical laboratory reports; excavation figures showing the original and final extents of the oil skim pit with soil sample locations and depths below ground surface; excavation photographs showing the final excavation extents and sample locations and of the land treatment area showing the placement of the impacted soils and stormwater BMPs. The report shall be due to COGCC no later than November 1, 2015.

The on site land treatment area is subject to the following requirements:

Land treatment of oily waste shall be performed in strict accordance with the requirements of COGCC Rule 907.e. (2). Store stockpiled oily waste in a manner to prevent contamination of surrounding soil, stormwater, surface water and groundwater; until such time that the waste is properly treated or disposed in accordance with COGCC Rule 907.e.

The land treatment of soils on the location will be strictly limited to a three year completion timetable. All soils in the land treatment area will be required to be removed by May 31, 2018. An aggressive and diligent effort will be expected with regard to tilling, application of fertilizer, other soil amendments and water to ensure that bioremediation of the impacted soil is fostered and enhanced in order to meet the deadline.

Prior to using treated material for backfill, submit soil sampling and analytical results verifying that the treated material complies with all contaminants of concern in soil listed on Table 910-1 for COGCC approval. If the backfill material will be covered with at least 3-feet clean cover, analysis of the inorganics (EC, pH, SAR) in soil is not

required. For progress and confirmation sampling, collect a minimum of one (1) discrete soil sample from each 100 cubic yards of treated soil. At a minimum, collect soil samples from the treatment area twice per year to establish the rate of biodegradation. The soil samples shall be collected consistently from the same locations during each sampling event.

Prepare and submit a land treatment progress report twice per year consisting of one sampling event in the late spring (May) and one sampling event in the early fall (October). Once the representative soil samples indicate that the soils meet the Table 910-1 allowable concentrations for BTEX, TPH, SAR, EC and pH, the soils can be used to backfill the oil skim pit excavation. If the soils will be under a minimum of three feet of clean cover material, pH, EC and SAR do not have to meet Table 910-1 concentrations. Following the removal of the treated soils, after 3 years or adequate remediation has been achieved, a minimum of four (4) discrete soil samples shall be collected from the footprint of the land treatment area to confirm that the remaining soils comply with the Table 910-1 allowable concentrations for pH, EC, SAR, BTEX and TPH.

Please reference Remediation #9053 on all correspondence regarding this project.

Thank you,

Robert J. Young  
Environmental Protection Specialist



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Cc: Rem #9053 - Conditions of Approval Correspondence



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