

**Attachment 1**  
**Form 19 Supplemental NFA**  
**Gee 15C-25HZ**  
**API 05-123-39172**

How Was the Extent Determined?

On January 9, 2016, a total of five surface water samples (SW01 through SW05) were collected from a pair of gravel quarry ponds (hereafter referred to as the north and south ponds) and a connecting channel for benzene, toluene, ethylbenzene, and total xylenes (BTEX) analysis by United States Environmental Protection Agency (USEPA) Method 8260C. The north pond was frozen over, limiting surface water sample collection during this initial sampling event. Laboratory analytical results indicated BTEX concentrations were less than the laboratory reporting limit of 1.0 micrograms per liter ( $\mu\text{g/L}$ ) in all five surface water samples.

On January 12 through 14, 2016, surface water sample locations SW01 through SW05 were resampled and six additional surface water samples (SW06 through SW11) were collected for BTEX analysis from the north and south ponds and from an effluent ditch that exits the north pond and discharges to an unnamed creek. Laboratory analytical results indicated BTEX concentrations were less than the laboratory reporting limit of 1.0  $\mu\text{g/L}$  in all surface water samples.

On January 13 through 15, 2016, nineteen surface soil samples (SS01 through SS10 and SS58 through SS66) were collected from the shores of the south pond and forty-seven surface soil samples (SS11 through SS57) were collected from ground surface within the spray release area. Due to observable impacts, the western shore of the south pond was scraped. After scraping the shoreline, soil samples SS01 through SS10 were collected at 50-foot intervals along the western shore of the south pond. No visual indication of impacts were observed on the shorelines at the time of sampling. Soil samples within the spray release area (SS11 through SS57) were collected at 50-foot grid center intervals. The soil samples were submitted for laboratory analysis of total petroleum hydrocarbons (TPH) by USEPA Methods 8015C and 8260C, BTEX by USEPA Method 8260C, pH by USEPA Method 9045D, and specific conductance (EC) by USEPA Method 9050A. Laboratory analytical results indicated that TPH concentrations in the south pond shoreline soil samples SS02, SS04, SS05, and SS08 and spray release area soil samples SS15 and SS16 exceeded the COGCC Table 910-1 allowable level of 500 milligrams per kilogram (mg/kg) for TPH.

On January 15, 2016, four additional surface water samples (SW12 through SW15) were collected from the south pond for BTEX analysis. Laboratory analytical results indicated BTEX concentrations were less than the laboratory reporting limit of 1.0  $\mu\text{g/L}$  in all four surface water samples.

On January 18, 2016, following the removal of impacted surface soil within the spray release area, two additional confirmation soil samples (SS15@4" and SS16@4") were collected and submitted for TPH analysis. Laboratory analytical results indicated TPH concentrations were in compliance with COGCC Table 910-1 allowable levels in the two confirmation soil samples.

On February 8, 2016, surface water sample locations SW07 and SW08 were resampled for BTEX analysis. Laboratory analytical results indicated BTEX concentrations were less than the laboratory reporting limit of 1.0 µg/L in both surface water samples. Following the removal of approximately 3 inches of soil along the western shore of the south pond, four additional soil samples (SS02@3", SS04@3", SS05@3", SS08@3") were collected and submitted for TPH analysis. Laboratory analytical results indicated TPH concentrations were in compliance with COGCC Table 910-1 allowable levels for TPH and less than the laboratory reporting limit in all four soil samples.

Approximately 510 cubic yards of impacted soil were excavated from the spray release area and western shore of the south pond and transported to the Buffalo Ridge Landfill in Keenesburg, Colorado, and the Front Range Regional Landfill in Erie, Colorado, for disposal. The general site layout, release location, and soil sample locations are depicted on Figure 2. The surface water sample locations are depicted on Figure 3. The soil and surface water analytical results are summarized in Tables 1 and 2, respectively. The laboratory analytical reports are attached.