



Fwd: REM 10268, Maudlin Gulch soil pile remediation

1 message

Fischer - DNR, Alex <alex.fischer@state.co.us>
To: Darla Geimausaddle - DNR <darla.geimausaddle@state.co.us>

Thu, Aug 31, 2017 at 2:07 PM

Please upload email chain to REM 10268.

Thanks
Alex

----- Forwarded message -----

From: **Dave Weinert** <davew@kirkwoodcompanies.com>
Date: Wed, Aug 23, 2017 at 2:20 PM
Subject: REM 10268, Maudlin Gulch soil pile remediation
To: "Fischer - DNR, Alex" <alex.fischer@state.co.us>
Cc: Tom Kirkwood <tomk@kirkwoodcompanies.com>, Brad Lane <bradl@kirkwoodcompanies.com>, Scott Kerr <scottk@kirkwoodcompanies.com>, Gene Vandeest <GeneV@kirkwoodcompanies.com>

Alex:

Thanks for your email reply to my voice mail on Friday.

Wesco may have misunderstood the approved Form 27. We understood that progress reports were not due to be submitted until the work had started. As discussed in my voice mail, Wesco has not begun treatment of the soils, so we have not yet submitted any progress reports. Based on your email below, this appears to be incorrect. Beginning today, Wesco will submit monthly Form 27s detailing the work progress.

Regarding the start of soil treatment, our estimated start date as provided in the Form 27 was July 1st, 2017. Wesco had originally submitted a Form 4 to treat the soils on 4/17/2017. We were subsequently informed by the COGCC that the request to treat the soils should be made on a Form 27. The Form 27 was first submitted on June 2nd, 2017. After multiple revisions, the Form 27 was approved by COGCC July 18th, 2017. Our estimated completion date is July 1st, 2018. The approved Form 27 established a compliance date as follows for the soils to be treated "Wesco shall complete remediation within three years of the date of this conditional approval – by July 1st, 2020". Wesco has completed three previous projects in Colorado with the planned contractor (Symmetry). On each project, Symmetry has successfully remediated the soils to COGCC standards well within the three year time limit. Typically after mixing the bacteria in the soil to be remediated, the pile is undisturbed for three months or more while the bacteria bioremediates the hydrocarbons. Symmetry then collects soil samples on a regular basis until the soils have been treated to COGCC standards, usually without any additional disturbance to the soil pile. Wesco then submits a closure request for the treated soils.

Moving forward, starting August 28th and continuing until the end of hunting season, Wesco has land-owner required reduced hours access to the field. By the end of hunting season, the winter weather will make it difficult to begin soil treatment. In addition, although the bacteria degrade the hydrocarbons in all weather, they appear to be more active and effective in warmer weather. During cold weather, they may go dormant. Given the advancing fall, Wesco would like to treat the soil according to the approved Form 27 in the late spring of 2018. We anticipate the soil pile meeting COGCC

standards by the end of 2018 or early 2019, well before the July 1st, 2020 compliance date established by the COGCC in the approved Form 27.

If you have any questions or require further information, please feel free to call or email me.

Thanks,

Dave

Dave Weinert

HSE Coordinator

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From: Fischer - DNR, Alex [<mailto:alex.fischer@state.co.us>]

Sent: Monday, August 21, 2017 6:39 AM

To: Dave Weinert <davew@kirkwoodcompanies.com>

Cc: Kris Neidel - DNR <kris.neidel@state.co.us>; Jeremy Ferrin - DNR <jeremy.ferrin@state.co.us>; Tom Kirkwood <tomk@kirkwoodcompanies.com>; Gene Vandeest <GeneV@kirkwoodcompanies.com>

Subject: Re: REM 10268, Maudlin Gulch Remediation

Dave-

I received your voice message from last Friday. You stated in your voice message that WESCO has not initiated remediation and that it will be little awhile until you actually begin doing the work. I would suggest that WESCO comply with the COAs that were on the approved F27 including providing monthly Supplemental F27s regarding the project status. WESCO should include in the monthly Supplemental F27s reason(s) why the remedial activities have not been initiated and a schedule for when WESCO actually plans on performing the remedial activities.

Thanks

Alex

On Fri, Aug 18, 2017 at 1:15 PM, Fischer - DNR, Alex <alex.fischer@state.co.us> wrote:

Folks,

It was the COGCCs understanding that treatment of material with in the bermed area immediately adjacent to the west side of the tank battery would begin in July 2017. The F27 (Document Number 401298580) was approved July 18, 2017 with conditions of approval (COAs) including:

- Monthly Supplemental F27s shall be submitted providing a project status including a diagram showing sampling locations, sample depths, laboratory analytical data tables and complete analytical reports.

Has WESCO initiated remedial activities?

Provide a status of this remediation.

Alex

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



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