To: Steve Annecone[Steve.Annecone@apexcos.com]; Beierle - CDPHE, Rob[robert.beierle@state.co.us]; Will Nabours[Will.Nabours@apexcos.com]
From: Stevenson, Peter[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CA0210B9CD464B5A8779B165812DD479-STEVENSON, PETER]
Sent: Wed 6/7/2017 8:34:49 PM (UTC)
Subject: RE: Wolf Creek Pass Spill path forward

Consider this:

2017: Sample August and November, please consider adding MW-5 back into the location list, as documentation on benzene levels reaching clean up goals is scant.

2018: Sample May. Pull treatment system if all data supports it. Dry ground would be helpful for this activity. Keep MWs -1A, 2A, 1, 2, 3,4, 5, 6, 7 and T-2 for final clearance sampling.
I will need to re-engage the USFS to determine any requirements from their perspective.

Future: We can discuss sampling going forward some more later, but I would put in a dedicated tygon or Teflon sample line in MW-1 that I could hook up a peristaltic pump to purge and collect samples remotely, negating the need for a lane closure. MW-1 seems to hit highest in May or August, so sampling once or twice a year should suffice. The assumption then would be that MW-1 would act as a surrogate for all other wells, and when it reaches clean up goals a confirmation sampling (or two) of most remaining monitoring wells should be adequate to close out the site. Once we get some feedback from the USFS, petition the State to take over the oversight of the clean up.

From: Steve Annecone [mailto:Steve.Annecone@apexcos.com]
Sent: Monday, June 05, 2017 10:46 AM
To: Beierle - CDPHE, Rob <robert.beierle@state.co.us>; Will Nabours <Will.Nabours@apexcos.com>
Cc: Stevenson, Peter <Stevenson.Peter@epa.gov>
Subject: RE: Wolf Creek Pass Spill path forward

Rob,

Not yet but it probably makes sense for us to meet with both of you. I thought Pete/EPA would ultimately defer to CDPHE regarding cleanup goals and when we've met the closure criteria, but it would be good for us to understand any of your remaining concerns. We've definitely hit the limit of what we can do with our existing remediation system, and overall, hydrocarbons are continuing to degrade naturally. Would it make sense to decommission the system, abandon the treatment and monitor wells in the wetlands, and then allow the wetlands to recover naturally while we conduct long-term monitoring of three or four roadside wells?

Steve

Steve Annecone, P.E.

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From: Beierle - CDPHE, Rob [mailto:robert.beierle@state.co.us]
Sent: Friday, June 02, 2017 2:53 PM
To: Will Nabours <Will.Nabours@apexcos.com>
Cc: Steve Annecone <Steve.Annecone@apexcos.com>
Subject: Re: Wolf Creek Pass Spill path forward

Will,

Pete Stevenson and the U.S. EPA are the lead regulatory agency regarding the cleanup at Wolf Creek Pass. Have you touched base with him regarding a meeting?

Regards,

Rob

Robert Beierle
Unit Leader
Hazardous Waste Corrective Action Unit

P 303.692.3368
4300 Cherry Creek Drive South
Denver, CO 80246-1530
robert.beierle@state.co.us

On Thu, Jun 1, 2017 at 3:30 PM, Will Nabours <Will.Nabours@apexcos.com> wrote:

Hi Rob,

Steve Annecone and I would like to discuss the path forward for the Wolf Creek Pass Spill site; would you be available at a time tomorrow, June 2nd, when we'd be able to discuss the site via tele-conference? In summary, groundwater sampling results continue to show steady declines in dissolved hydrocarbons over time due to bioremediation in the wetlands, chemical oxidation work in the source area, and ongoing natural attenuation. Background dissolved oxygen concentrations remain elevated in wetlands area monitoring wells and have, and will continue to, promote intrinsic bioremediation over time. The bioremediation system has achieved cleanup of the wetlands area to the maximum extent practical. Additionally, dissolved benzene concentrations in samples collected from well MW-1 have been reduced by 82% since monitoring began, and by over 99% in samples collected from well MW-2. That being said, we'd like to discuss approaches for moving site towards closure.

Please let us know when a convenient time would be. Thank you and looking forward to speaking with you!

Will Nabours

Will Nabours, P.E.

Engineer

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