

Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>

RE: Notification of Chavers GW Exceedances for Iron in 4th Qtr 2024

1 message

Greg Geras <GregG@asphaltspecialties.com> To: "Gagnon - DNR, Nikie" <nikie.gagnon@state.co.us> Thu, Jan 30, 2025 at 4:22 PM

Hi Nikie,

As requested, please find the attached letter report with confirmation sample results and graph of iron concentrations in wells MW-3 (up-gradient well) and MW-6 (down-gradient/POC well). Confirmation sample results from January 2025 indicate Iron is back below the Site groundwater quality standard in both wells. I'll continue with quarterly sampling to monitor GW conditions. The 1st Quarter 2025 sampling event will occur in March. Please let me know if you have any questions.

Thanks,

Greg

From: Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>
Sent: Tuesday, January 14, 2025 11:46 AM
To: Greg Geras <GregG@asphaltspecialties.com>
Subject: Re: Notification of Chavers GW Exceedances for Iron in 4th Qtr 2024

[External Email]

Hi Greg.

Please see the attached acknowledgement letter regarding the groundwater exceedance at Chavers. The Division would like you to submit the confirmation sampling data along with a trend analysis for the iron results collected to date. Continue sampling the groundwater quality on a quarterly basis for now and we will discuss reducing the sampling frequency at a later date once we have more information on this exceedance.

Kind regards,

Nikie Gagnon

Environmental Protection Specialist

Cell: 720.527.1640

Physical: 1313 Sherman Street, Room 215, Denver, CO 80203

Address for FedEx, UPS, or hand delivery:

DRMS Room 215, 1001 E 62nd Ave, Denver, CO 80216

nikie.gagnon@state.co.us | https://www.drms.colorado.gov

On Mon, Jan 13, 2025 at 5:02 PM Greg Geras <GregG@asphaltspecialties.com> wrote:

Hi Nikie,

As requested, please find the attached notification letter with map regarding the exceedances reported for Iron above the groundwater quality standard in two (2) wells (Up-gradient MW-3 and Down-gradient MW-6) for the 4th Qtr 2024 sampling event. As discussed early today, the current path forward is to collect confirmation samples from MW-3 and MW-6 for Iron and then conduct the next quarterly sampling event (1st Qtr 2025 in March 2025). I'll send results for to re-evaluate path forward when I get them (end of March/beginning of April).

Please let me know if you have questions.

Thanks,

Greg Geras

Land Resource Manager

Asphalt Specialties Co., Inc.

345 W. 62nd Ave.

Denver, CO 80216

Office (Direct): 720-322-7055 | Cell: 303-495-9888

Office (Main): 303-289-8555 | Fax: 303-289-7707

E-mail: GregG@asphaltspecialties.com

Web: www.asphaltspecialties.com

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M-2015-030 Chavers Confirmation Sample Results and Trend Discussion_1-30-2025.pdf 148K



January 30, 2025

Ms. Nikie Gagnon Environmental Protection Specialist Colorado Division of Reclamation, Mining, and Safety

Re: January 2025 Confirmation Sample Results and Trend Discussion for Iron in Monitoring Wells MW-3 (Up-gradient Well) & MW-6 (Down-Gradient/POC Well) Chavers Mining Resource (DRMS Permit No. M-2015-030)

Ms. Gagnon:

As requested in the DRMS letter dated January 14, 2025, ASCI is submitting the January 2025 confirmation sampling results and a graph of the Iron concentrations reported in samples from these wells to-date. Below is a discussion of the results and trends identified.

January 2025 Confirmation Sample Results

Results of the January 2025 confirmation samples collected for Iron indicate concentrations are below the groundwater quality standard of 0.3 mg/L in both MW-3 (up-gradient well) and MW-6 (down-gradient/POC well). The results reported for each well are below.

- MW-3 (Up-gradient Well) Confirmation Sample Results for Iron = 0.092 mg/L
- MW-6 (Down-gradient/POC Well) Confirmation Sample Results for Iron = 0.009 mg/L

A copy of the laboratory report is presented in Attachment 1.

Iron Concentration Trends in MW-3 and MW-6

A graph of all Iron concentrations reported in samples to-date for MW-3 and MW-6 is presented in Attachment 2. The following is a summary of the trends identified for each well.

MW-3 (Up-gradient Well) Trends

- Iron was detected at concentrations above the laboratory reporting limit in five (5) of the eleven (11) sampling events prior to the December 2024 exceedance.
- Results for Iron in three (3) of the last four (4) samples collected are higher than the general concentrations reported during the baseline monitoring period; however, the December 2024 sample is the only result that exceeded the Site groundwater quality standard.
- As MW-3 is a background well for the Site, this indicates the recent elevated concentrations for Iron are from an up-gradient, off-site source or activity.



Ms. Nikie Gagnon - DRMS

MW-3 and MW-6 Confirmation Sample Results & Trend Discussion

January 30, 2025 Page 2 of 2

MW-6 (Down-gradient/POC Well) Trends

- Iron was detected at concentrations above the laboratory reporting limit in in two (2) of the six (6) sampling events prior to the December 2024 exceedance.
- The January 2025 sample result indicates that the concentration for Iron is back within the general range of previous low-level detections reported in past sampling events.

Discussion of Results, Trends, and Future Monitoring Activities

Based on the results of the January 2025 confirmation samples, the 4th Quarter 2024 exceedances for Iron above the Site groundwater quality standard in both MW-3 (up-gradient well) and MW-6 (down-gradient/POC well) are considered to have been temporary and/or anomalous at this time. It is worth noting that the Site groundwater quality standard of 0.3 mg/L for Iron is a drinking water standard (INS Table 2). Though the Iron concentrations reported in December 2024 exceed the drinking water standard, they are well below the INS Table 3 agricultural standard of 5 mg/L. Given the multiple industrial and agricultural land uses that are present up-gradient of the Chavers facility, along with various construction projects in the area, it is not possible to positively identify a source or reason for the Iron exceedances in December 2024. ASCI will continue to conduct quarterly sampling events at the Site to monitor groundwater quality conditions. The next sampling event (1st Quarter 2025) is scheduled for March of 2025.

Please contact me at (303) 289-8555 or GregG@asphaltspecialties.com if you have any questions.

Sincerely,

Greg Geras Land Resource Manager Asphalt Specialties Co., Inc.

Attachment 1 – January 2025 Laboratory Sample Results

Attachment 2 – Graph of Iron Concentrations Reported in Groundwater for Chavers Monitoring Wells MW-3 (Up-gradient) and MW-6 (Down-gradient)



Analytical Results

TASK NO: 250114221

Report To: Greg Geras Company: Asphalt Specialties 345 W. 62nd Avenue Denver CO 80216 Bill To: Accounts Payable Company: Asphalt Specialties 345 W. 62nd Avenue Denver CO 80216

Task No.: 25011 Client PO: 4050. Client Project: Chave	980.17000.117			ate Repor	ved: 1/14/25 rted: 1/22/25 ttrix: Water		
Customer Sample ID Sample Date/Time Lab Number							
Fest	Result / Units	Method	RL	MDL	Date Analyzed	QC Batch ID	Analyzed By
<u>Dissolved</u> Iron	0.092 mg/L	EPA 200.7	0.005	0.0005	1/16/25	QC78911	MBN

Abbreviations/ References:

RL = Reporting Limit = Minimum Level MDL = Method Detection Limit mg/L = Milligrams Per Liter or PPM ug/L = Micrograms Per Liter or PPB mpn/100 mls = Most Probable Number Index/ 100 mls Date Analyzed = Date Test Completed (d) RPD acceptable due to low duplicate and sample concentrations.
 (s) The accuracy of the spike recovery value is reduced due to the analyte concentration in the sample being disproportionate to the spike level. The laboratory control sample recovery was acceptable

ND = Not Detected at Reporting Limit.

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Analytical Results

TASK NO: 250114221

Report To: Greg Geras Company: Asphalt Specialties 345 W. 62nd Avenue Denver CO 80216 Bill To: Accounts Payable Company: Asphalt Specialties 345 W. 62nd Avenue Denver CO 80216

Task No.: 250114 Client PO: 4050.9 Client Project: Chave	80.17000.117			ate Repo	ved: 1/14/25 rted: 1/22/25 atrix: Water		
Customer Sample ID Sample Date/Time: Lab Number:							
Test	Result / Units	Method	RL	MDL	Date Analyzed	QC Batch ID	Analyzed By
<u>Dissolved</u> Iron	0.009 mg/L	EPA 200.7	0.005	0.0005	1/16/25	QC78911	MBN

Abbreviations/ References:

RL = Reporting Limit = Minimum Level MDL = Method Detection Limit mg/L = Milligrams Per Liter or PPM ug/L = Micrograms Per Liter or PPB mpn/100 mls = Most Probable Number Index/ 100 mls Date Analyzed = Date Test Completed

(d) RPD acceptable due to low duplicate and sample concentrations.
 (s) The accuracy of the spike recovery value is reduced due to the analyte concentration in the sample being disproportionate to the spike level. The laboratory control sample recovery was acceptable

ND = Not Detected at Reporting Limit.

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Analytical QC Summary

TASK NO: 250114221

Report To: Greg Geras Company: Asphalt Specialties Receive Date: 1/14/25 Project Name: Chavers GW Wells

Test	QC Batch II	QC Batch ID QC Type Result			Method	Prep Date					
Iron	QC78911	Method Blank	ND		EPA 200.7	1/14/25					
Test	QC Batch ID	QC Type	Limits	% Rec	RPD	Method					
Iron	QC78911	Duplicate -250114011-01	0 - 20	-	0.0	EPA 200.7					
		LCS	90 - 110	101.8	-						
		MS -250114046-01B	75 - 125	95.3	-						

All analyses were performed in accordance with approved methods under the latest revision to 40 CFR Part 136 unless otherwise identified. Based on my inquiry of the person or persons directly responsible for analyzing samples and generating the report (s), the analyses, report, and information submitted are, to the best of my knowledge and belief, true, accurate, and complete.

DATA APPROVED FOR RELEASE BY

Abbreviations/ References:

RL = Reporting Limit = Minimum Level MDL = Method Detection Limit mg/L = Milligrams Per Liter or PPM ug/L = Micrograms Per Liter or PPB mpn/100 mls = Most Probable Number Index/ 100 mls Date Analyzed = Date Test Completed (d) RPD acceptable due to low duplicate and sample concentrations.
 (s) The accuracy of the spike recovery value is reduced due to the analyte concentration in the sample being disproportionate to the spike level. The laboratory control sample recovery was acceptable

ND = Not Detected at Reporting Limit.

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Chain of Custody Form

Report To Information	Bill To Information (If different from report to)	Project Name / Number Chavers GW Wells				
Company Name: Asphalt Specialties Co., Inc.	Company Name:					
Contact Name: Greg Geras	Contact Name:					
Address: 345 W. 62 nd Ave.	Address:	Task Number (Lab Use Only)				
City Denver State CO Zip 80216	City State Zip					
Phone:303-289-8555	CAL Task 250114221					
Email: gregg@asphaltspecialties.com	Email:	250114221				
Sample Collector: Greg Geras		JML				
Sample Collector Phone: 303-495-9888	PO No.:4050.980.17000.117					



<u>Commerce City Lab</u> 10411 Heinz Way Commerce City CO 80640

Lakewood Service Center 610 Garrison St, Unit E Lakewood CO 80215

Phone: 303-659-2313

www.coloradolab.com

											<u> </u>	·			Tests	Requ	ested				
Water (CWA / NPDES) Includes wastewater, non-potable samples <u>not</u> intended for drinking water use.		-potable	(SDWA)(503)Includes finished drinking water, raw (untreated) water samples intended for human consumption.846)Samp		Solid (Sh (503 Reg 846) Soli Samples	Solid (Sludge) (503 Regs / RCRA/ SW- 846) Solid and Semi Solid		rab	Grab or (Check One Only) Composite												
Date	Time			Sample	D		°Z	0	50	Iron											
1/14/25	1400	MW-3					1			\boxtimes											
1/14/25	1500	MW-6					1			\boxtimes											
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Inctavotic	mer I -h to Glt		(D 45 miguon)			C/S Inf	<u>.</u>									nt Yes 🗆					
Instructions: Lab to filter samples (0.45 micron)								_	M	\mathcal{D}		C/S Ch	arge 🗌		np.7	°C/Ice	$\tilde{\mathbf{x}}$	Sample	Pres. Y	es 🗆 N	A
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