

STATE OF
COLORADO

Girardi - DNR, Chris <chris.girardi@state.co.us>

Farmers Sand Application M2024057- Preliminary Adequacy Review Letter

Shelly Hoover <Rochelle@erccolorado.net>

Fri, Feb 7, 2025 at 12:33 PM

To: "Girardi - DNR, Chris" <chris.girardi@state.co.us>, "Jared Ebert (jared.ebert@state.co.us)" <jared.ebert@state.co.us>

Cc: Lisa Shea <Lisa@erccolorado.net>, Troy Thompson <Troy@erccolorado.net>, scott <scott@farmersres.com>, Tyler Worley <tyler@erccolorado.net>

Hi Chris and Jared

In the attached Preliminary Adequacy Review Letter Item 6 it is stated "please provide an evaluation of the chemical properties of the dredged material to ensure protection of the surrounding environment from pollution." Since it is not stated in the letter as to what chemical properties you want the material tested for, we propose TCLP metals, TCLP VOCs, TCLP SVOCs. Are there any other chemicals (e.g. pesticides, herbicides) DRMS requests the material be analyzed for?

Thank you

shelly

Shelly Hoover, PE



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From: Girardi - DNR, Chris <chris.girardi@state.co.us>**Sent:** Tuesday, February 4, 2025 11:05 AM**To:** scott <scott@farmersres.com>**Cc:** Jared Ebert - DNR <jared.ebert@state.co.us>; Lisa Shea <Lisa@erccolorado.net>; Shelly Hoover <Rochelle@erccolorado.net>; Troy Thompson <Troy@erccolorado.net>**Subject:** Farmers Sand Application M2024057- Preliminary Adequacy Review Letter

[EXTERNAL]

Hello,



STATE OF
COLORADO

Girardi - DNR, Chris <chris.girardi@state.co.us>

Farmers Sand Application M2024057- Preliminary Adequacy Review Letter

Girardi - DNR, Chris <chris.girardi@state.co.us>

Tue, Feb 11, 2025 at 8:31 AM

To: Shelly Hoover <Rochelle@erccolorado.net>

Cc: "Jared Ebert (jared.ebert@state.co.us)" <jared.ebert@state.co.us>, Lisa Shea <Lisa@erccolorado.net>, Troy Thompson <Troy@erccolorado.net>, scott <scott@farmersres.com>, Tyler Worley <tyler@erccolorado.net>

Good morning Shelly,

The Division recommends using the Synthetic Precipitation Leaching Procedure (SPLP) method for metals and organics to evaluate the potential impacts to the hydrologic balance. Please provide the results of these analyses with a comparison to the Water Quality Control Commission's (WQCC) Regulation No. 41 – The Basic Standards for Groundwater (Reg 41) and the most conservative values in Tables 1 thru 4 and Table A.

In addition, the Division recommends soil sampling for VOCs, SVOCs, and metals and comparing the results to the EPA's Regional Screening Levels (RSLs) for residential and industrial soil concentration to the sub-columns within the main Screening Levels column to determine possible risk the soil may pose. To note, the RSLs are not used to determine potential risk soils may pose to surface and groundwater except where there is no Colorado water standard for a chemical or in other very specific circumstances.

The Division requests that an adequate number of samples be taken to characterize the existing stockpiles at the site.

Please let me know if you have any questions.

Best regards,

Chris Girardi

Environmental Protection Specialist Intern



COLORADO
Division of Reclamation,
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Department of Natural Resources

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