

From: "Joby Adams" <joby@cgrs.com>
To: "Gary Beers" <gbeers@smtpgate.dphe.state.co.us>
Date: 4/30/2010 3:01 PM
Subject: RE: GreenBack Shaeffer Ranch: Produced Water Treatment Plant -Need for additional information

Gary - I apologize for omitting the the other analyses. I will attach in a separate email. Your questions are addressed below.

Joby Adams, P.G.
Principal-Hydrogeologist
CGRS, Inc.
(970) 493-7780
Direct 970-449-4032
Cell 970-420-6821
Fax: (970) 493-7986

email: Joby@cgrs.com

www.cgrs.com

-----Original Message-----

From: Gary Beers [mailto:gbeers@smtpgate.dphe.state.co.us]
Sent: Friday, April 30, 2010 1:16 PM
To: Joby Adams
Subject: GreenBack Shaeffer Ranch: Produced Water Treatment Plant -Need for additional information

Joby,

We received the application for a certification under the general permit covering produced water discharges and have some questions.

(1) Cover letter indicates inorganic and organic analyses of untreated produced water are enclosed. Only a single page of organic analyses (on January 28 2010 sample) was enclosed. Are there additional analyses of the untreated produced water ? RESPONSE: Attachment to follow for all analyses.

(2) Additional clarification is needed on the nature of the water to be discharged to the drainage on the Shaeffer Ranch. Assuming the RO concentrate is routed to the lined pond - is the discharge the finished water from the RO unit ? RESPONSE: Yes the discharge will be from the RO unit. It is likley that a selective ion bed after the RO unit will be installed to remove boron.

It is important that the chemical profile of this treated water be, also, furnished in the application and be based on the treatment technology that will be used. Will you provide such information, including standard parameters (i.e., pH, TSS, oil grease, compounds detected at elevated levels in the raw produced water, etc.) ? RESPONSE - As the system is not built yet we only have the discharge parameters predicted by the Air Stripping (organics only) and RO models. If actual

data are required prior to operation then we will provide that data directly after start up. We will forward the data available from equipment manufactures.

I do need to confirm that the discharge will comply with our surface water quality standards upon discharge before I can issue the certification.

Based on the information discussed during our meeting several months ago (with Solid Waste staff) and the information provided in the application, I do not expect significant problems in the preparation of this certification - if the above additional information is submitted.

Thanks

Gary Beers
Groundwater, Land Application, and Industrial General Permits Unit

Water Quality Control Division
Colo. Dept. of Public Health and Environment
4300 Cherry Creek Drive South (WQCD-P-B2)
Denver, CO 80246-1530
phone: 303-692-3524 fax: 303-782-0390
email: gary.beers@state.co.us
Visit our web site at :
<http://www.cdphe.state.co.us/wq/PermitsUnit/wqcdpmt.html>