

# STATE OF COLORADO

John W. Hickenlooper, Governor  
Christopher E. Urbina, MD, MPH  
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.      Laboratory Services Division  
Denver, Colorado 80246-1530      8100 Lowry Blvd.  
Phone (303) 692-2000      Denver, Colorado 80230-6928  
Located in Glendale, Colorado      (303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department  
of Public Health  
and Environment

September 29, 2011

Mr. A. G. Andrikopoulos, President  
A.G. Andrikopoulos Resources, Inc.  
P.O. Box 788  
Cheyenne, Wyoming 82003-0788

Subject: Preview of Certification under General Permit COG84000 for Continued Coverage  
Facility Name: Elk Springs #3 Well (MINDI Permit No. COG600476)

Dear Mr. Andrickopoulos:

Since a written response has not been provided to our August 2 (2010) letter, we are going to proceed to transfer coverage for this discharge to a new certification under the general permit for produced water discharge (COG84000). The generic format for this new certification is attached and serves as a preview of the terms and monitoring requirements that are expected to apply to your facility. These requirements are substantially greater than the monitoring requirements under your current certification (COG600476). Under the new certification, you will be given a time period for taking the steps necessary, including any additional treatment, to comply with the new limitations.

We are planning to issue your new certification before January 2012, based on the information in your past application and monthly monitoring reports.

You have the option to apply for an individual permit, instead of continuing coverage under the new certification. For some parameters, the individual permit could provide less stringent limitations, if there is established flow in the receiving stream. This mixing zone option is not available under the above new certification, even if the receiving water has established flow. If you would like to discuss the individual permit option, the contact is Andrew Neuhart ([Andrew.Neuhart@state.co.us](mailto:Andrew.Neuhart@state.co.us) , 303-692-3655).

Sincerely,

Gary Beers  
Groundwater, Land Application, and Industrial General Permits Unit  
Water Quality Control Division

**ATTACHMENT**  
**GENERIC FORM FOR CERTIFICATE UNDER**  
**GENERAL PERMIT FOR PRODUCED WATER DISCHARGES**

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Colorado Department  
of Public Health  
and Environment

<<DATE>>

<<OWNER>>

<<COMPANY>>

<<STREET ADDRESS>>

<<CITY, COLORADO>>

RE: Certification, Colorado Discharge Permit System – Produced Water Treatment Facilities  
Permit Number COG84000 Certification Number: <<COG8400X>>

Dear <<OWNER>>:

Enclosed please find a copy of the permit certification, which was issued under the Colorado Water Quality Control Act. Please read the enclosed permit and certification, including the fact sheet. The Division holds the permittee legally liable for all permit requirements.

The Water Quality Control Division (the Division) has reviewed the application submitted for the <<FACILITY>> and determined that it qualifies for coverage under the CDPS General Permit for Produced Water Treatment Facilities (the permit).

- **Basis for Certification Site Specific Parameters**  
The discharge is <<water body>>, within Segment of the <<name>> River Sub-basin, <<name>> River Basin, found in the Classifications and Numeric Standards for the <<xx>> (Regulation No. <<xx>>; last effective update effective <<date>>). Segment <<xx>> is <<xx>> and is classified for the following beneficial uses: <<xx>>.

The attached Fact Sheet for the certification which provides information on the selection of the limitations and a description of the facility is attached. As explained, the certification requirements are based on the parameters of concern identified in the general permit, including WET chronic testing, various metals, and antidegradation-based limits. For organic compounds, BTEX limitations are included based on aquatic life standards and a quarterly requirement exist for scan of volatile and semi-volatile organic compounds. (Note: This fact sheet is specifically developed to describe each facility and nature of discharge to surface waters.)

**General Information:**

- **Permit Action Fees** : The Annual Fee for this certification is \$ 2,150 and is invoiced every July. Do Not Pay This Now. The initial invoice will be prorated and sent to the legal contact shortly.

- **Changes to the Certification** – Any changes that need to be made to the certification page – changes in outfalls, monitoring requirements, etc., must be submitted using the "Permit and Certification Modification form" available on our website: [coloradowaterpermits.com](http://coloradowaterpermits.com), and signed by the legal contact.
- **Discharge Monitoring Report (DMR)** forms will be mailed out within the next month. Reports must be submitted **monthly** as long as the certification is in effect. The permittee shall provide the Division with any additional monitoring data on the permitted discharge collected for entities other than the Division. This will be supplied to the Division within 48 hours of the receipt of the data by the permittee. If forms have not been received, please contact the Division at 303-692-3517.
- **Sampling Requirements** Sampling shall occur at a point after treatment, or after the implementation of any Best Management Practices (BMPs). If BMPs or treatment are not implemented, sampling shall occur where the discharge leaves control of the permittee, and prior to entering the receiving stream or prior to discharge to land. Samples must be representative of what is entering the receiving stream.
- **Termination requirements** This certification to discharge is effective long term, even though construction and dewatering discharge are only expected for approximately three months.
- **Groundwater Contamination** If groundwater contamination is encountered, then the permittee is to contact the Division, the permit writer, cease all discharges, and if appropriate, contact the owner of the collection system receiving the discharge. If the dewatering can be treated to meet surface water or groundwater numeric limitations, the certification will be amended to include sampling and monitoring for additional parameters representative of the groundwater contamination. The discharge of contaminated groundwater, above surface water or groundwater standards, is not authorized under this permit.
- **Certification Records Information** The following information is what the Division records show for this certification.

For any changes to Contacts – Legal, Local, Billing, or DMR – a "Notice of Change of Contacts form" must be submitted to the Division. This form is also available on our web site and must be signed by the legal contact.

Facility: <<name>> County: <<name>>  
 Industrial Activities : Commercial Disposal Facility (for Produced Water) SIC Code : 1300

<i>Legal Contact Receives all legal documentation, pertaining to the permit certification. [including invoice; is contacted for any questions relating to the facility; and receives DMRs.]</i>	
<<OWNER>>	Phone number: <<number>>
<<COMPANY>>	Email: <<address>>
<<STREET ADDRESS>>	
<<CITY, COLORADO>>	

If you have any other questions please contact me at 303-692-3524.

Sincerely

.....

Gary Beers, Unit Manager  
WATER QUALITY CONTROL DIVISION

Enclosures: Certification page; Fact Sheet, General Permit  
xc:

<<name>> County, Local County Health Department  
Permit File: <<COG8400x>>

## STATE OF COLORADO



COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT  
WATER QUALITY CONTROL DIVISION  
TELEPHONE: (303) 692-3500

CERTIFICATION TO DISCHARGE  
UNDER  
CDPS GENERAL PERMIT COG840000  
DISCHARGES ASSOCIATED WITH PRODUCED WATER TREATMENT FACILITIES

Certification Number: <<COG84000x>>

This Certification to Discharge specifically authorizes:

<<COMPANY>>  
to discharge from the facility identified as

<<FACILITY>>  
Latitude <<XX>> Longitude <<XX>>

to:  
<<name>>

Facility Located at: <<XX>> Miles <<DIRECTION>> of <<TOWN>>, <<COUNTY>>, Colorado  
(See Figures 1, 2, and 3)

Outfall <<001A>>	Latitude <<XX>>, Longitude <<XX>> <<DESCRIPTION OF FLOW AND IDENTIFICATION OF RECEIVING WATER>>
Outfall <<002A>>	Latitude <<XX>>, Longitude <<XX>> <<DESCRIPTION OF FLOW AND IDENTIFICATION OF RECEIVING WATER>>

Permit Limitations and Monitoring Requirements apply consistent with General Permit Part I.B and Part I.C

Parameter	Coding Info*	Discharge Limitations Maximum Concentrations				Monitoring Frequency	Sample Type
		30-Day Average	7-Day Average	Daily Max.	2-Year Average		
Applicable to all Discharges							
<b>GENERAL PARAMETERS OF CONCERN</b>							
Flow, MGD	50050	0.065	NA	0.065	---	Weekly	Instantaneous or Continuous
Temperature, degrees C	00010	NA	Report	Report (2hr Max)	---	Continuous	Recorder
Total Suspended Solids, mg/l	00530	30	45	NA	---	Monthly	Grab
Total Dissolved Solids, mg/l	70295	NA	3,500	NA	---	Monthly	Grab
pH, s.u. (Minimum-Maximum)	00400	NA	NA	6.5-9.0	---	Monthly	Grab
Chlorides, mg/l	00940	250	NA	Report	38	Monthly	Grab
Sulfates, mg/l	81020	250	NA	Report	38	Monthly	Grab
<b>ORGANIC PARAMETERS OF CONCERN</b>							
Oil and Grease, mg/l	03582	Report	NA	10	--	Monthly	Grab
Benzene, ug/l	34030	Report	NA	5,300	---	Monthly	Grab
Toluene, ug/l	34010	Report	NA	17,500	---	Monthly	Grab
Ethylbenzene, ug/l	37371	Report	NA	32,000	---	Monthly	Grab
Xylenes (Total), ug/l	81551	Report	NA	Report	---	Monthly	Grab
Volatile and Semi-Volatile Organic Compounds, ug/l	51577	Report	NA	Report	----	Quarterly	Grab
<b>METAL PARAMETERS OF CONCERN</b> Potentially Dissolved unless noted otherwise)							
Aluminum, Total Recoverable	01104	87	NA	750	13	Quarterly	Grab
Antimony	01095	Report	NA	Report	---	Quarterly	Grab
Arsenic	01209	150	NA	340	23	Quarterly	Grab
Barium	01311	Report	NA	Report	---	Quarterly	Grab
Beryllium	01312	100	NA	Report	15	Quarterly	Grab
Cadmium	01313	1.2	NA	9.1	0.2	Quarterly	Grab
Chromium, Trivalent	04262	231	NA	1,773	35	Quarterly	Grab

Chromium, Hexavalent	01220	11	NA	16	1.7	Quarterly	Grab
Copper	01040	29	NA	50	4.4	Quarterly	Grab
Iron, Total Recoverable	00980	1,000	NA	Report	150	Quarterly	Grab
Iron, Dissolved	01046	Report	NA	Report	---	Quarterly	Grab
Lead	01049	11	NA	281	0.2	Quarterly	Grab
Manganese	01056	2,618	NA	4,738	393	Quarterly	Grab
Mercury, Total	71900	NA	NA	1.4	---	Quarterly	Grab
Nickel	01065	168	NA	1,513	25	Quarterly	Grab
Selenium	01145	4.6	NA	18.4	0.7	Quarterly	Grab
Silver	01075	3.5	NA	22	0.53	Quarterly	Grab
Thallium	01057	15	NA	NA	2.5	Quarterly	Grab
Uranium	22703	6,915	NA	11,070	1,037	Quarterly	Grab
Zinc	01090	405	NA	464	61	Quarterly	Grab
<b>RADIONUCLIDE PARAMETERS OF CONCERN</b>							
Radium 2226+228, pCi/l	[11503 10]	Report	NA	Report		Quarterly	Grab
<b>TOXICITY MEASURES</b>							
WET- Chronic	Pimephales Lethality Ceriodaphnia Lethality	TCP6C	NA	NA	Stat Diff & IC25> IWC		Quarterly
	Pimephales Toxicity Ceriodaphnia Toxicity	TCP3B	NA	NA	Report Stat Diff & IC25		Quarterly

Certification is issued and effective <<DATE>>

Certification Expires: August 31, 2014

This certification under the permit requires that specific actions be performed at designated times. The certification holder is legally obligated to comply with all terms and conditions of the permit.

Signed,

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Gary Beers  
Unit Manager  
Water Quality Control Division

Attachments: To be developed based on site-specific information provided in <<NAME'S>> application for discharge permit.

Figure 1. Regional Map with Location of Facility.

Figure 2. Local Map Showing Location of Outfall 001.

Figure 3. Facility Layout with Water Flows

Fact Sheet to Permit Number <<COG8400X>>

- I. General Parameters of Concern
- II. Site-Specific Parameters of Concern
- III. Detailed Facility Description

General Permit COG84000