



Re: response to DRMS TR10 preliminary adequacy review letter for Holcim (US) Inc. Portland, CO Plant

1 message

Cazier - DNR, Tim <tim.cazier@state.co.us>

Thu, Nov 20, 2014 at 8:54 AM

To: Justin Andrews <justin.andrews@holcim.com>

Cc: "Sueker, Julie" <Julie.Sueker@arcadis-us.com>, "Peters, Chris" <Chris.Peters@arcadis-us.com>, "Yusko, Lauri" <Lauri.Yusko@arcadis-us.com>, Tom Kaldenbach - DNR <tom.kaldenbach@state.co.us>, Amy Eschberger - DNR <amy.eschberger@state.co.us>

Justin,

Thank you for your prompt response. Although the extension request is more than 90 days, the Division does not have an explicit Rule disallowing an extension of that duration. Furthermore, additional monitoring and sampling may prove beneficial to your arguments. The Division will grant your request for an extension to February 28, 2015.

Tim Cazier, P.E.
Environmental Protection Specialist



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On Wed, Nov 19, 2014 at 7:38 PM, Justin Andrews <justin.andrews@holcim.com> wrote:

Tim,

Holcim would like DRMS to consider an extension of TR-10 for the monitoring of groundwater.

The report that was sent on Holcim's behalf by Arcadis today probably does not explicitly state this; however, it does state that we would like to continue with our existing groundwater monitoring program while we continue to evaluate and study groundwater measurements.

The purpose of today's report was to provide DRMS with a summary of the work that has been completed thus far and provide some of the background information as to why we feel the change in monitoring is necessary. The report will show you that the bypass dust that has been placed in the landfill is predominately comprised potassium sulfate and potassium chloride. If the bypass dust were causing the increase in sodium, we would also see an increase in potassium, which we do not.

We would like to continue to evaluate this work while we simultaneously performing another round of groundwater monitoring in December. Once we have this data, we can present the information to you in the form of another report or at meeting that we can schedule at your convenience. Therefore, Holcim is requesting that TR-10 deadline be extended until February 28, 2015.

Please let me know if you have any additional questions regarding this matter.

Justin Andrews
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On Wed, Nov 19, 2014 at 5:15 PM, Cazier - DNR, Tim <tim.cazier@state.co.us> wrote:

Justin,

As you are aware, today, November 19, 2014 is the Division's decision date for TR-10. When we talked earlier this week, you indicated Holcim would be requesting an extension to today's decision date. I was in the field today and of course unable to drive while simultaneously reviewing a 20-page response letter.

Having received the response after returning to the office today, the Division has insufficient time to perform an adequate review of the response today. As such the Division has no choice but to deny this Technical Revision.

As I am currently unable to access our database to enter the denial, I will entertain a request for an extension to today's decision date if it is received via email or fax before 8:59 am Thursday, November 20, 2014. Otherwise, this email should be considered the Division's official denial of the Technical Revision to substitute K:Na ratio for Na concentrations in the groundwater monitoring program for the Portland Limestone Quarry.

I will only be in the office intermittently tomorrow (Thursday), but if you need to talk to me, please call before 9:00 am or wait til Friday.

I apologize for the quick email, but your last minute response requires an even more "last-minute-response" from the Division to prevent an automatic approval of the TR.

Tim Cazier, P.E.
Environmental Protection Specialist



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On Wed, Nov 19, 2014 at 1:05 PM, Peters, Chris <Chris.Peters@arcadis-us.com> wrote:

Mr. Cazier,

Attached please find ARCADIS' response to the DRMS TR 10 preliminary adequacy review letter for Holcim's request to remove sodium as a water quality parameter from the current Groundwater Monitoring Plan at Holcim's Portland, Colorado Plant.

Let me know if you would like a hard copy of the attached and we will send it out.

Feel free to contact me with any questions. Thank you.

Christopher Peters | Vice President | chris.peters@arcadis-us.com

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