



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, Colorado 80203

October 1, 2018

Derrick Dease
Holcim (US) Inc.
3500 Highway 120
Florence, CO 81226

**Re: Boettcher Limestone Quarry, Permit No. M-1977-348
Technical Revision No. 9 (TR-9), Adequacy Review No. 1**

Mr. Dease:

On September 12, 2018, the Division of Reclamation, Mining, and Safety (Division) received your Technical Revision request (TR-9) for the Boettcher Limestone Quarry, Permit No. M-1977-348. The requested revision addresses the following items:

Revise the groundwater monitoring program to include sampling parameters from the Table Value Standards established by CDPHE, WQCC's Regulation No. 41 – The Basic Standards for Ground Water.

The Division has identified the following adequacy items that need to be addressed before an approval of TR-9 can be issued:

- 1) The Division could not find any Cyanide monitoring data for this site in the permit record. Please include Cyanide in the revised sampling parameter list.
- 2) The groundwater data available in the permit record shows several exceedances of Gross Alpha Particle Activity (Gross Alpha) in monitoring wells MW-1 through MW-4. No exceedances of Beta and Photon Emitters (Beta) were observed for these four wells. The Division was unable to find any Gross Alpha or Beta monitoring data in the permit record for wells MW-5 through MW-7. Please include Gross Alpha and Beta in the revised sampling parameter list.
- 3) Please add a column to Table 1: Proposed Analyte List that includes the most restrictive Table Value Standard for each analyte listed (as applicable).
- 4) Please commit to clearly highlighting/emphasizing any exceedances in Table Value Standards in the monitoring reports submitted to the Division.
- 5) Please commit to providing the Division with written notification (email acceptable) of an exceedance in an approved groundwater NPL within five (5) working days of learning that such exceedance exists, as required by Rule 3.1.7(9). Additionally, any such exceedance should be



included in the summary page at the beginning of each monitoring report submitted to the Division.

- 6) The operator states the revised parameter list will be used for the next three sampling events, through the end of 2019. Please be advised, the approved groundwater monitoring program must continue to be implemented at the site until any proposed revisions have been reviewed and approved by the Division through the Technical Revision or Amendment process.

Depending on the results observed with the increased sampling parameters, the Division may be able to approve a reduction of the parameter list once sufficient data has been provided to demonstrate the sampling results are representative of existing groundwater conditions.

- 7) The operator does not discuss the monitoring frequency in this revision. The required monitoring frequency was reduced from quarterly to semi-annually with approval of Technical Revision No. 7. Does the operator propose to continue monitoring on a semi-annual basis? If so, please explain how this monitoring frequency will adequately demonstrate to the Division that reclamation has been achieved so that existing and reasonably potential future uses of groundwater are protected in accordance with Rule 3.1.7(8).

Please submit the requested information by the decision date **October 12, 2018**. This revision may be deemed inadequate and the request denied if the permittee fails to address the above listed adequacy items to the Division's satisfaction by the decision date. If additional time is needed to submit a response, an extension request must be received by our office by the decision date.

If you have any questions, you may contact me by telephone at 303-866-3567, ext. 8129, or by email at amy.eschberger@state.co.us.

Sincerely,



Amy Eschberger
Environmental Protection Specialist

EC: Sara Harkins, Golder Associates, Inc. at: sara_harkins@golder.com
Michael Cunningham, DRMS at: michaela.cunningham@state.co.us

