



## COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, Colorado 80203

October 12, 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. 2**

Mr. Dease:

On October 11, 2018, the Division of Reclamation, Mining, and Safety (Division) received your adequacy response for Technical Revision No. 9 (TR-9). The Division has identified the following adequacy item that needs to be addressed before an approval of TR-9 can be issued:

- 1) The operator states that monitoring data for wells MW-4, MW-6, and MW-7 will not be compared with Table Value Standards in monitoring reports because WQCC's Interim Narrative Standard does not apply to waters with Total Dissolved Solids (TDS) greater than 10,000 mg/L. However, the operator has not provided the Division with any pre-1994 groundwater monitoring data for the site showing TDS values greater than 10,000 mg/L. In fact, the monitoring data on file shows an increasing trend in TDS for well MW-4 (installed in 1999, prior to completion of CKD disposal on site). The operator has not demonstrated that ambient groundwater conditions at the site included TDS values greater than 10,000 mg/L. Therefore, please commit to comparing monitoring data for all monitoring wells (MW-1 through MW-7) to Table Value Standards in the monitoring reports submitted to the Division, including highlighting/emphasizing any exceedances in these values.

Please submit the requested information by the decision date **October 26, 2018**. This revision may be deemed inadequate and the request denied if the permittee fails to address the above listed adequacy item to the Division's satisfaction 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](mailto:amy.eschberger@state.co.us).

Sincerely,

Amy Eschberger  
Environmental Protection Specialist

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