



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

October 31, 2019

Ms. Diana Furman
GCC Rio Grande, Inc.
3372 Lime Road
Pueblo, CO 81004

RE: Preliminary Adequacy Review; Technical Revision (TR-07); GCC Pueblo Cement Plant, Permit No. M-2002-004

Dear Ms. Furman,

On October 21, 2019, the Division of Reclamation, Mining and Safety (Division) received a request for Technical Revision (TR-07) to revise the sampling and analysis plan for the groundwater monitoring at the Pueblo Cement Plant, Permit No. M-2002-004. Please be advised that on November 21, 2019, the application for TR-07 may be deemed inadequate and denied unless the following adequacy items are addressed to the Division's satisfaction. Subsequent to receipt and review of the Operator's response to these items. Please respond to the adequacy items with a letter summarizing each response, to the numbered items below, in a cover letter titled "Preliminary Adequacy Review Response TR-07, M-2002-004".

1. Please update the map provided in Figure 1 to be appropriately sized and in compliance with the requirements of Rule 6.2.1(2), specifically revise the scale of the map to be no larger than 1 inch = 50 feet nor smaller than 1 inch = 660 feet.
2. Please update the map and legend in Figure 1 to remove the cross-section A-A' or provide the cross-section as Figure 2.
3. Section 1.0, 1st paragraph, second to last sentence, please revise this sentence to indicate that MW-5 is located *north* of the plant.
4. Section 2.0, please provide a stratigraphic section to help depict the geologic formations at the site.
5. Section 3.0, does GCC have standard operating procedures (SOPs) that provide detailed step by step instructions for each task that can be referenced within each subsection and included as an appendix?
6. Section 3.4, 4th paragraph, last sentence, substitute "with" for "within".
7. Section 3.4, 5th paragraph, please describe what equipment will be used to filter the sample, e.g., syringe, peristaltic pump, or other?
8. Section 3.4, 5th paragraph, please provide a statement about how the filter will be purge or rinsed prior to sample collection.



9. Section 3.4, 5th paragraph, please include a statement regarding the care that needs to be taken to not overfill the pre-preserved bottles which could lead to loss of preservative resulting in a sample that is not properly preserved. Additionally, include what can be done in the event that a bottle is overfilled.
10. Section 3.4, 6th paragraph, please commit to submitting a technical revision if a dedicated pump system is to be installed in any of the current or future groundwater monitoring wells.
11. Section 3.6.1, please provide a table of listing the method specific holding times.
12. Section 3.6.2, Sample Labels, it is unclear to the Division if each sample will be labeled with bulleted information or labels might contain some of the bulleted information. Please commit to each sample label will be completed with the bulleted information.
13. Section 3.6.2, Chain of Custody Forms, please provide additional detail on the information that will be contained on each chain of custody form including but not limited to: project identification, date and time of sampling, sample matrix type, sample preservation method(s), signature of sampling personnel, and date and time of sample custody transfer.
14. Section 3.6.2, Custody Seal, please commit to signing and dating the each custody seal using an indelible pen.
15. Section 4.2, Laboratory Analytical Parameters, please update the second sentence to include a more concise citation of State of Colorado Water Quality Control Commission (WQCC) Regulation No. 41 – The Basic Standards for Ground Water, Agricultural Standards Table 3 (December 2016).
16. Section 4.2, Laboratory Analytical Parameters, along with the addition of the full citation in #15 please include statement that the Regulation No. 41 is periodically updated and the most recent Agricultural Standard values will be used during the sampling event.
17. Section 4.2, Table 1, please update Note 2 to include the citation in #15.
18. Section 4.2, Table 1, Notes 4 and 5 appear to be incomplete, please update the notes.
19. Section 5.0, please clarify who will be performing the data validation process of the field and laboratory results (in-house, third party, or other).
20. Section 5.1, please include a discussion about completeness. Completeness is referenced as being specified in this SAP in Section 5.2.1.
21. Section 5.2.1, Field QA Sample Review, please clarify what is meant “subject to professional judgment”.
22. Section 6, Reporting, please provide a schedule as to when data validation reports will be provided.

This concludes the Division’s preliminary adequacy review of your application. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.

The decision date for your application is set for November 21, 2019. However, please allow the Division sufficient time to complete its review by submitting your response no later than three (3) working days prior to the decision date, by November 18, 2019. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

If you need additional information or have any questions, please contact me at Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at **303-866-3567 x8114**, or by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

cc: Jared Ebert; Division of Reclamation, Mining & Safety