



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

February 28, 2020

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

RE: Adequacy Review #2; 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. On February 26, 2020 the Division received your responses to the Preliminary Adequacy Review mailed to you on October 31, 2019. An extension to the decision date was approved on February 14, 2020 that revised the decision date to March 20, 2020. Please be advised that on March 20, 2020, 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 "Adequacy Review #2 Response TR-07, M-2002-004".

1. **Original Adequacy Comment (#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.

GCC Response - Figure 1 was previously submitted in a 36" X 48" format which meets Rule 6.2.1(2) with 1 inch = 660 feet, otherwise 1 section width (1 mile) = 8 inches. It is thus interpreted that the Division actually wants a smaller printer-friendly format. Figure 1 has been updated to an 11" X 17" format.

Division Response – In the hardcopy of the original application the figure was not submitted in a 36" x 48" format, it was submitted on an 8.5" x 11" format and thus does not meet the requirements of Rule 6.2.1(2). Please update the map to be appropriately sized and in compliance with the requirements of Rule 6.2.1(2). Moving forward if GCC would like to submit responses and maps electronically please seek approval to do so.

2. Please update Figure 1 to show the current extent of mining to be consistent with the Annual Report Map submitted in August 2019.



3. Please update Figure 1 to show the location of the newly installed monitoring well, MW-8.
4. Table 1, please update the table to include the analytical method and the method detection limit for each analyte.
5. Sections 3.3 and 3.4, please remove references to Specific Conductance and replace with Conductivity to be consistent and avoid possible future confusion.
6. Section 3.4, paragraph 5, the response to item #10 in the Preliminary Adequacy Review is inconsistent with what was incorporated into the text. A minor revision (MR) is not part of the Act and Rules that govern hard rock and construction material mine sites only technical revisions (TR) are allowed, please revise.
7. Section 5, data validation, what is the level of data validation that will be done by the third party? The Division is aware that there are typically 3 tiers of validation that can be done;

Tier 1 involves a general review of the QC data for the project. This is sometimes referred to as a "Summary Forms" review. At a minimum, all data should receive a Tier 1 review.

Tier 2 involves a selected validation of a portion of the data. Which aspect of the project is to be reviewed should be defined in the DQO discussion of the project. The focus might be on a specific area within the sampling area, specific analytes or analyses of concern critical to decision making, or some other factor(s). The review may also look at unusual results noted in the Tier 1 review.

Tier 3 involves validation of all the data collected and reported. This includes a review of the raw data, the laboratory's standards log books, extractions logs, instrument printouts, chromatograms (if applicable), mass spectra (if applicable), etc. Calibration data, sample analysis data, and quality control data are all evaluated. Typically, this is a "third party review" and is based on strict protocols, such as the National Functional Guidelines.

Currently, there are groundwater exceedances at the site and the Division would like a commitment from the Operator to having a Tier 3 Data Validation done on an annual basis.

8. **Original Adequacy Comment (#20)** - Section 5.1, please include a discussion about completeness. Completeness is referenced as being specified in this SAP in Section 5.2.1.

GCC Response - Reference to "completeness" is acknowledged to have been confusing and reference to the term has been removed from Sections 5.1 Data Quality Objectives and 5.2.1 Data Validation.

Division Response - Data Quality Indicators (DQIs) provide a means to evaluate the quality of data and are normally defined in terms of PARCCS (precision, accuracy, representativeness, completeness, comparability, and sensitivity (method detection limits)). Precision, accuracy, and sensitivity are usually covered in method specific criteria. However, the other DQIs (representativeness, completeness, and comparability) should be defined in the plan for the project as a whole. Please

revise the text to include a discussion of completeness, or provide a discussion of the other terms referenced in the text (representativeness and comparability).

9. Section 5.2.1, Field QA Sample Review, for consistency and to avoid possible future confusion please use the same equation for calculating RPD, compared to the one used in Section 5.1.

This concludes the Division's adequacy review #2 of TR-07. 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 March 20, 2020. However, please allow the Division sufficient time to complete its review by submitting your response no later than five (5) working days prior to the decision date. 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