



August 6, 2020

Mike Toelle
Holcim (US) Inc.
3500 Highway 120
Florence, CO 81226

RE: Boettcher Limestone Quarry, Permit No. M-1977-348, Status of Required Corrective Actions - Problem Abated

Mr. Toelle:

The Division of Reclamation, Mining and Safety (Division) is providing the following status update on the corrective actions required for Problem #2 identified in the Division's inspection report sent on February 28, 2020:

INSPECTION TOPIC: Hydrologic Balance

PROBLEM #2: The groundwater monitoring data for the site shows several parameters exceeding Table Value Standards set by the Water Quality Control Commission's (WQCC) Regulation No. 41, which apply to this unclassified area. This is a problem pursuant to C.R.S. 34-32.5-116(4)(h) and Rule 3.1.6(1)(b), which require disturbances to the prevailing hydrologic balance of the affected land and of the surrounding area and to the quantity and quality of water in surface and groundwater systems both during and after the mining operation and during reclamation be minimized, including compliance with applicable federal and Colorado water quality laws and regulations such as statewide water quality standards and site-specific classifications and standards adopted by the WQCC.

CORRECTIVE ACTIONS: By the corrective action date, the operator shall submit a Technical Revision, with the applicable fee, to revise the groundwater monitoring program to include proposed point(s) of compliance in accordance with Rule 3.1.7(6) and (7) at some distance hydrologically downgradient from the Cement Kiln Dust (CKD) disposal areas. Due to the lack of ambient groundwater quality data for the site required by Rule 3.1.7(b)(viii), the revision shall also include proposed background monitoring well(s) located outside of the CKD disposal areas and screened across similar lithological units as existing downgradient monitoring wells and the proposed compliance well(s). The information obtained from these wells will be used to evaluate protection afforded groundwater quality and compliance with groundwater standards.

CORRECTIVE ACTION DUE DATE: July 27, 2020

STATUS UPDATE: *On July 29, 2020, the Division received a Technical Revision with the applicable fee (TR received via email on July 24, 2020) to revise the groundwater monitoring program to include a background monitoring well (MW-8), and depending on the results of water quality data collected from that well, also include a compliance monitoring well (MW-9). The proposal to install the compliance well at a later time depending on the water quality data collected*



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from the background well is in accordance with discussions that occurred between the operator and the Division after the inspection report was issued. Therefore, this problem is considered abated at this time.

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,

A handwritten signature in blue ink that reads "Amy Eschberger". The signature is written in a cursive, flowing style.

Amy Eschberger
Environmental Protection Specialist

Cc: Travis Bennett, Holcim (US) Inc.
Sara Harkins, Golder Associates, Inc.
Javier Vargas-Johnson, DWR
Michael Cunningham, DRMS