



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

March 22, 2021

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

RE: Division Adequacy Review; 2020 Annual Groundwater Report; Pueblo Cement Plant, Permit No. M-2002-004

Dear Ms. Furman,

On February 26, 2021, the Division of Reclamation, Mining and Safety (Division) received your 2020 Annual Groundwater Report for the Pueblo Cement Plant, Permit No. M-2002-004. Please respond to this adequacy review with a letter summarizing each response, to the numbered items below, in a cover letter titled "Review Response 2020 Annual Groundwater Report, M-2002-004". The Division requires additional information and clarification to help interpret groundwater conditions at the site. Please provide the following:

1. Please provide additional information regarding naturally occurring seleniferous minerals in the Fort Hayes and other Formations at the site that may account for the selenium concentrations observed at the site.
2. Currently the Boron standard at the site is 0.75 mg/L. A review of the Boron standard in Regulation 41 indicates the current standard is set to protect the following plants in ascending order of sensitivity: Pecan, Black Walnut, Persian (English) Walnut, Jerusalem Artichoke, Navy Bean, American Elm, Plum, Pear, Apple, Grape (Sultanina and Malaga), Kadota Fig, Persimmon, Cherry, Peach, Apricot, Thornless Blackberry, Orange, Avocado, Grapefruit, Lemon. It is not reasonable to expect that any of these crops will be water with groundwater near the site. Thus the Division believes the standard for Boron should be set at 5.0 mg/L following guidance provided by footnote (g) of the regulation. Please commit to a Boron standard of 5.0 mg/L for future standard comparisons.
3. In the Recommendation section, first bullet, the operator recommends collecting additional sample volume for analysis of major cations and anions to determine groundwater type. The Division agrees that this information will further the understanding of groundwater at the site. The operator should submit a Technical Revision for Division approval to change the analyte suite to be collected at the site. However, the Division does not want the lack of an approved Technical Revision to prohibit 1st quarter sample analysis for the updated analyte suite.



This concludes the Division's review of the 2020 Annual Groundwater Report. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

The due date for your response has been set for April 21, 2021.

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

ec: Diana Furman, GCC Rio Grande, Inc., dfurman@gcc.com
Landon Beck, Resource Hydrogeologic Services, lbeck@resourcehydrogeologic.com