



Eschberger - DNR, Amy <amy.eschberger@state.co.us>

Compliance Requirement Past Due

Scott A Harcus <scotta.harcus@cemex.com>

Mon, Aug 2, 2021 at 10:04 AM

To: "amy.eschberger@state.co.us" <amy.eschberger@state.co.us>

Cc: "michaela.cunningham@state.co.us" <michaela.cunningham@state.co.us>, Maribel B Aguilos <maribelb.aguilos@cemex.com>

Good morning Amy –

Thanks for taking my call, my apologies for the tardiness of the Q2 C-pit groundwater report as we had a busy July. We do not see any deadline requirements within the language of TR-12 as it is written, but moving forward we will target to get the quarterly reports to you within 30 days as discussed.

Please find the attached PDF as an electronic submittal. The hard copy is schedule to be delivered tomorrow 8/3.

Let me know if you have questions on the report!

Best regards,

Scott

**Scott A. Harcus**

Lyons Cement Plant

Environmental Manager

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From: Division of Reclamation, Mining and Safety <dnr_drms_permitadmin@state.co.us>**Sent:** Monday, August 2, 2021 12:21 AM**To:** Scott A Harcus <scotta.harcus@cemex.com>**Cc:** amy.eschberger@state.co.us; michaela.cunningham@state.co.us**Subject:** Compliance Requirement Past Due**Importance:** High

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**C-Pit_Report_Y21Q2.pdf**

181K



July 7, 2021

Ms. Amy Eschberger
Division of Reclamation, Mining and Safety
Environmental Protection Specialist
1313 Sherman Street, Room 215
Denver, Colorado 80203

Via FEDEX
TRK #7744 1823 2987

Re: CEMEX Lyons Mine Permit M-1977-208
Technical Revision No. 12, Revised Groundwater Monitoring Plan
Fourth Quarter 2020 Monitoring Data

Dear Ms. Eschberger:

This letter transmits the surface water and groundwater data associated with the sampling of the cement kiln dust disposal area (C-Pit). This report includes data from the C-Pit ponded water and related groundwater monitoring for the second quarter of 2021, covering the reporting period from April 1, 2021 to June 30, 2021. Table 1 presents data for the last four quarters.

Groundwater samples were collected on May 17, 2021 from the CEM-001 and CEM-004 groundwater monitoring wells and from the C-Pit ponded water. The inspection of groundwater monitoring well CEM-005 on May 17, 2021 indicated that there was not enough water volume to collect a representative sample.

The samples collected from C-Pit ponded water and the groundwater monitoring wells were analyzed for pH, chloride, sulfate, total dissolved solids, selenium, and thallium. The reported pH data are based on the pH analyses performed at the time of sample collection in the field (Table 1). The measured pH at groundwater monitoring well CEM-004 and analytical results for chloride, sulfate, total dissolved solids (TDS), selenium and thallium from the May 17, 2021 groundwater sample were within the target levels prescribed by TR-12, as shown in Table 1.

In addition, a Stiff Diagram of the groundwater cation/anion data from CEM-004 compared to the average and 90th percentile of the cation/anion concentrations from the last four quarterly samples of C-Pit data is provided in Figure 1 for reference. As shown in Figure 1 and consistent with past reports, the signature for CEM-004 continues to be significantly different from that of C-Pit.

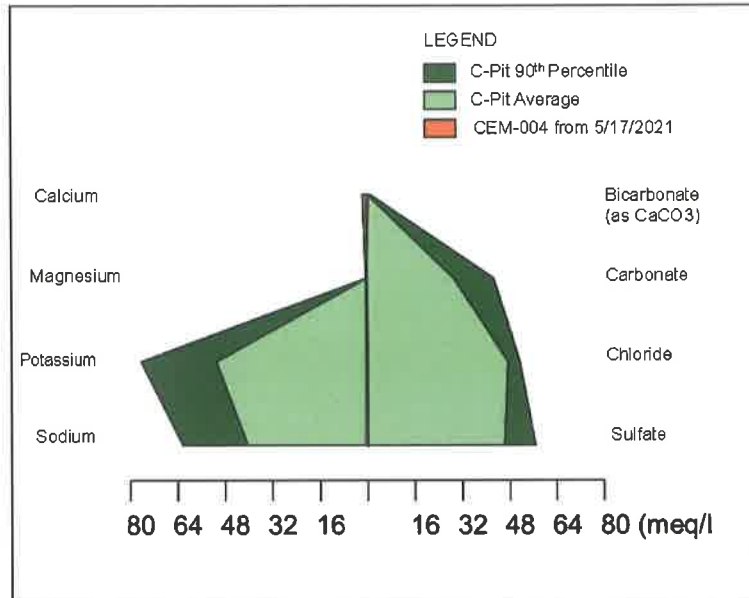


Figure 1: Second quarter 2021 cation/anion data for CEM-004 compared to C-Pit

Please contact me at 303-823-2124 or by email at scotta.harcus@cemex.com for any questions or concerns regarding this submittal.

Sincerely,

Scott A. Harcus
Environmental Manager

Encs. Y21Q2C-Pit Monitoring Report and associated Stiff Plot (Fig.1), and Summary of Analytical Results (Table 1)

Table 1
Summary of Analytical Results

Parameter	Units	C-Pit				CEM-001				CEM-004				CEM-005				CEM-004, CEM-005 Triggers (TR-12)
		2020 Q3	2020 Q4	2021 Q1	2021 Q2	2020 Q3	2020 Q4	2021 Q1	2021 Q2	2020 Q3	2020 Q4	2021 Q1	2021 Q2	2020 Q3	2020 Q4	2021 Q1	2021 Q2	
		8/25/2020	11/2/2020	3/2/2021	5/17/2021	8/25/2020	11/2/2020	3/2/2021	5/17/2021	8/25/2020	11/2/2020	3/2/2021	5/17/2021	* See dates below	* See dates below	* See dates below	* See dates below	
		value	value	value	value	value	value	value	value	value	value	value	value	value	value	value	value	
pH (On-site)	su	10.52	12.26	12.43	11.46	7.98	8.2	7.81	7.74	7.96	7.94	7.23	7.46	insufficient water to sample	insufficient water to sample	insufficient water to sample	insufficient water to sample	6.5-8.5
Chloride	mg/L	1700	1520	1650	1470	1710	1780	1880	1830	1.8	6	40.5	9.6					1,053
Sulfate	mg/L	2660	2180	1900	1610	21	23.9 H	15.8	32.9	7.5	22.5	242	17.3					2,641
Total Dissolved Solids	mg/L	8980	7850	8720	7350	4250	3960	4530	4290	99	118	487	114					501-10,000 or 1.25 times background
Selenium	mg/L	0.288	0.349	0.407	0.421	<0.0008	<0.0008	0.0462	<0.005 U	0.0012	0.0008	0.0011	<0.005 U					0.05
Thallium	mg/L	0.0010	0.0010	0.0017	<0.004 U	<0.0004	<0.0004	<0.0004	<0.004 U	<0.0004	<0.0004	<0.0004	<0.004 U					0.002

Notes and Qualifiers:

H Sample analyzed beyond recommended hold time
U Detection limit is estimated
UJ Estimated low
X Data may not be representative due to nonstandard field sampling protocol
NA Not analyzed.
value Exceeds trigger

a CEM 005 Y20 Q3 Well Sounding: 8/25/2020

a CEM 005 Y20 Q4 Well Sounding: 11/3/2020

a CEM 005 Y21 Q1 Well Sounding: 3/2/2021

" CEM 005 Y21 Q1 Well Sounding: 5/17/2021