



STATE OF
COLORADO

Zuber - DNR, Rob <rob.zuber@state.co.us>

DRMS review of TR-05 for Bennett's Gravel Pit

1 message

Zuber - DNR, Rob <rob.zuber@state.co.us>

Mon, Jan 24, 2022 at 10:50 AM

To: Jim Doody <Jim.Doody@peakreadymix.com>, Ben Langenfeld <benl@lewicki.biz>, Michael Cunningham - DNR <michaela.cunningham@state.co.us>

Good morning, Jim.

Please see the attached letter.

Take care,
Rob

Rob Zuber, P.E.
Environmental Protection Specialist
Active Mines Regulatory Program



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

I am working remotely and can be reached by cell at 720.601.2276.

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Bennetts_Gravel_TR5_DRMS_2nd_Adequacy_Letter.pdf
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January 24, 2022

Jim Doody and Jon Mueller
Elam Construction, Inc.
556 Struthers Ave.
Grand Junction, CO 81501

Re: Bennett's Gravel Pit, Permit M-1979-166, TR-05 Second Adequacy Review

Dear Sirs:

The Division has reviewed your Technical Revision No. 5 (TR-05) application from Lewicki & Associates. After discussions related to our preliminary adequacy letter, we agree that a technical revision is sufficient; an addendum is not needed for this action. We do have the following adequacy items that need to be addressed.

1. Regarding the Exhibit C maps, please explain why the floodplain does not encompass the river on the east end of the maps, or revise the maps if appropriate.
2. Please explain the origin of the 100-foot setback from the river on Map C-2.
3. Please revise Map C-2 to show the location of the overburden stockpile.
4. On Map C-3 there is no road down the slope to the product stockpiles and the plant. Please explain if this was accidentally omitted or if the plan is for trucks and other equipment to traverse the slope without a designated road.
5. On page D-2, the second paragraph states that in Phase 1 groundwater will be pumped to the lake "at the NPDES permit's discharge point." However, per Map C-2, the NPDES discharge point is near the lake but not in the lake. Please clarify this and revise text or maps as appropriate.
6. Also related to the NPDES permit for the site (or CDPS permit, if appropriate), please explain the status of the permit. Will a revision be required from the Water Quality Control Division based on this revision to the mining and reclamation plan?
7. On page D-2, the second paragraph states that in Phase 2 groundwater will be pumped to a sediment pond. Elam Construction needs to provide a design for this pond or state in the Exhibit D text that another revision will be submitted prior to construction of this pond. This design could simply entail cross-sections similar to those on Map C-4 for the pit itself.
8. The reclamation plan, Exhibit E, and Map F-2 need to be revised so that the maximum area of the lake (or lakes) at any given time (during mining, during reclamation, and after reclamation) is 9.5 acres per the Well Permit (Number 049487). Alternatively, the operator can obtain written permission from the Division of Water Resources stating that the on-site lake (or lakes) can encompass more than 9.5 acres, and as large an area as 15.3 acres.
9. An editorial review is recommended by the Division to fix errors in this exhibit (and others). For example, on page E-2, in the last sentence of the Topsoil Replacement section, "following to topsoil" should be replaced with "following topsoil." Also, there is an error on the first line of page E-3.



10. On page E-4, the Weed Control section does not reference the extensive Weed Control Plan approved with TR-04. This plan should be referenced in Exhibit E (and the text in Exhibit E should agree with the plan), or Elam Construction should explain why this plan is not referenced and if it is no longer considered applicable to the site.
11. The text on page E-1 suggests that reclamation at the south end of the site (where the existing lake is located) will be completed in Phase 1, but the strip of land (between the pit and river) is bigger in Map F-2 than in Map F-1. Please explain if this is an error, or revise the submitted materials (text and/or maps) as appropriate.

Please note that the Division has not performed a detailed review of the reclamation cost estimate. This will be performed after we receive responses to this adequacy letter and the mining plan and reclamation plan are more clearly defined. In particular, Item No. 8 must be addressed.

If you have any comments or questions, please contact me at Rob.Zuber@state.co.us or by calling (720) 601-2276.

Thank you,



Robert D. Zuber, P.E.
Environmental Protection Specialist

Cc: Michael Cunningham, DRMS; Ben Langenfeld, Lewicki & Associates