



**COLORADO**  
**Division of Reclamation,  
Mining and Safety**  
Department of Natural Resources  
1313 Sherman Street, Room 215  
Denver, CO 80203

March 23, 2022

Brad Fancher  
Loveland Ready-Mix Concrete, Inc.  
644 N. Namaqua Road  
P.O. Box 299  
Loveland, CO 80539

**Re: Loveland Ready-Mix Concrete, Inc., Dunn Pit, File No. M-2021-059, 112c Permit  
Application Third Adequacy Review – Exhibits F, G and Appendix D Review Memo**

Mr. Fancher,

The Division of Reclamation, Mining and Safety (Division/DRMS/Office) reviewed the contents of the Loveland Ready-Mix Concrete, Inc. (LRM) 112c permit application Exhibit F, G and Appendix D adequacy response dated March 21, 2022 for the Dunn Pit, File No. M-2021-059. A copy of the third hydrology review memo from Patrick Lennberg dated March 23, 2022 is attached for review.

The Division is required to issue an approval or denial decision no later than March 31, 2022, therefore a response to the following adequacy review concerns should be submitted to the Division as soon as possible.

If you have any questions, please contact me at [peter.hays@state.co.us](mailto:peter.hays@state.co.us) or (303) 866-3567 Ext. 8124.

Sincerely,

Peter S. Hays  
Environmental Protection Specialist

Enclosure – Third Hydrology Review Memo

**Ec: Jared Ebert; Division of Reclamation, Mining & Safety  
Stephanie Fancher-English; Loveland Ready-Mix Concrete, Inc.  
Walt Niccoli; Telesto Solutions, Inc.**





**Date:** March 23, 2022

**To:** Peter Hays, DRMS

**From:** Patrick Lennberg, DRMS

**RE: Dunn Pit New Permit Application, Exhibits F, G and Appendix D Review Memo, File No. M2021-059**

On September 25, 2021, I was requested to review Exhibits F, G and the Groundwater Baseline Study (Appendix D) of the Dunn Pit new permit application M2021-059, below are follow-up questions that should be addressed after reviewing the Applicant's second adequacy responses.

#### **Appendix D**

16. Please provide copies of the completed groundwater data sheet(s) for each well sampled. In the future the Division will require submittal of these sheets along with other sample data.

Why are there no field parameters recorded during well purging on the field sheets? If parameters were recorded please update the field sheets.

*Second Adequacy Response: Field parameters are not measured while purging because over three-borehole volumes are removed from the monitoring well during the sampling events. Field parameters are taken at the time of sampling and recorded on the field sheets.*

**DRMS Follow-up:** In SOP #5 Groundwater Sampling, the Division could not find where it is stated that a well may be purged for volume only. Specifically in Section 4.2 it states "To demonstrate that you have collected a representative ground water sample, measure field parameters during purging and purge the well until these parameters stabilize.". Please commit to collecting field parameters during purging per the Groundwater Sampling SOP and recording those measurements on the field sheet. The completed field sheets are to be submitted with the other sampling data.

20. In Appendix D, page 15-16, the Applicant states groundwater level and quality samples will be collected from all monitoring wells on quarterly basis. After one year the Applicant may approach the Division seeking to modify the plan along with justification for the modification. In the Groundwater Sampling and Analysis Plan Section 5.0, page 2, the plan states groundwater quality samples will only be collected from select wells and those wells are listed in Table 1. Table 1 only lists five wells to be sampled. Please explain the discrepancy and update accordingly. The Division is expecting all monitoring wells to be sampled on quarterly basis.



*Second Adequacy Response: We revised Appendix D to reflect that we will collect water levels from all monitoring wells monthly, and water quality samples from the five wells listed in Table 1, quarterly. We cleaned up language in Appendix D in hopes of clearly showing the purpose of each monitoring well. Attachment 10 provides this revision.*

**DRMS Follow-up:** Please provide an explanation as to why the Applicant is not going to sample all monitoring wells at the site and only a sub-set? The Division is expecting all monitoring wells at the site to be sampled on a quarterly basis.

If you need additional information or have any questions, please let me know.

Sincerely,



Patrick Lennberg  
Environmental Protection Specialist

cc: Jared Ebert, DRMS