



STATE OF
COLORADO

Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>

Additional Information Requested, 1Q2022 GW Report, Lyons Quarry, M1977-208

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

Fri, Jun 3, 2022 at 1:52 PM

To: "Lennberg - DNR, Patrick" <patrick.lennberg@state.co.us>

Cc: Erik Estrada <erik.estrada@cemex.com>, Maribel B Aguilos <maribelb.aguilos@cemex.com>, Lillian F Deprimo <lillianf.deprimo@cemex.com>, Greg M Bridge <gregm.bridge@cemex.com>, Patrick Chalupsky <patrick.chalupsky@cemex.com>, Cita Cisse <cita.cisse@cemex.com>, Timothy W Rawlsky <timothy.rawlsky@cemex.com>

Good Afternoon Mr. Lennberg –

Please find the attached CEMEX response to your Additional Info Request Letter dated 5/6/2022.

A hard copy will not be mailed unless specifically requested.

Let me know if you have further questions.

Regards,

Scott



Scott A. Harcus

Lyons Cement Plant

Environmental Manager

Office : +1(303)823-2124

Mobile: +1(614)306-8838

Address: 5134 Ute Highway, Longmont, CO 80503

From: Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>

Sent: Friday, May 6, 2022 1:49 PM

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

Subject: Additional Information Requested, 1Q2022 GW Report, Lyons Quarry, M1977-208

CAUTION: External Email | PRECAUCIÓN: Correo electrónico externo | VORSICHT: Externe E-Mail |
ATTENTION: Courriel externe

Good Afternoon Mr. Marcus,

My name is Patrick Lennberg and I am the new Environmental Protection Specialist assigned to Boulder County.

Please find attached to this email a copy of the Division's request for additional information about the 1st quarter 2022 groundwater sampling report.

A hard copy will not be mailed unless specifically requested.

Please let me know if you have any questions.

Thank you,

Patrick

--

Patrick Lennberg

Environmental Protection Specialist



P 303.866.3567 x8114 | F 303.832.8106

Physical Address: [1313 Sherman Street, Room 215, Denver, CO 80203](#)

Address for FedEx, UPS, or hand delivery:

[1001 E 62nd Ave, Denver, CO 80216](#)

Patrick.Lennberg@state.co.us | <https://drms.colorado.gov>

CONFIDENTIALITY: The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication, and the information contained in it, is strictly prohibited. If you are not the intended recipient, please contact the sender and immediately destroy all copies of the original message.



CMX Lyons_C-pit GW RE-Addl Questions_Fnl_2022.06.03_esign-sh.pdf

907K



Mr. Patrick Lennberg
Environmental Protection Specialist
Department of Natural Resources
Division of Reclamation, Mining and Safety
Room 215
1313 Sherman Street
Denver, CO 80203

Via Email

RE: Additional Information Request
Lyons Quarry, Permit No. M-1977-208
Y22Q1 Groundwater Monitoring Report, C-Pit

Dear Mr. Lennberg:

On May 6, 2022, CEMEX received a letter from Division of Reclamation, Mining and Safety (DRMS) requesting additional information related to our 2022 1st Quarter Groundwater Monitoring Report. Below are CEMEX's responses in *italic font* to the requested items 1-4:

1. On Table 1 of the submittal, the concentration for Thallium is reported as <0.004 mg/l for C-Pit, CEM-001 and CEM-004. The trigger concentration is 0.002 mg/l. Please comment on the reported concentration being higher than the trigger concentration and why the reported value would not constitute an exceedance of the trigger concentration.

CEMEX Response:

The reported value of <0.004 mg/L would not constitute an exceedance because the diluted sample was ultimately reported to be a non-detectable value, even though the reporting limit was abnormally high due to the dilution of the samples. Furthermore, the results for Thallium have been non-detect (with reporting limits lower than the trigger concentration) for each location, except for C-Pit, since Technical Revision 12 (TR-12) established trigger concentrations.

It is standard practice for the laboratory to dilute samples prior to analysis if the elements do not pass QC when analyzed neat. In this case, the lab used a higher dilution factor of 10 for all samples in Q1 2022, resulting in elevated reporting limits to the analytical results. While the reporting limit for Thallium is <0.004 mg/L for Q1 2022 is above the trigger concentration of 0.002 mg/L, the results were non-detectable. The reported value is instead indicating that the analytical methodology could only provide a method detection limit (MDL - i.e., the lowest constituent concentration associated with a 99% reliability of a "non-zero" analytical result) or a minimum quantitative resolution of 0.004 mg/L. CEMEX has communicated with the lab to request a limit to the dilution factor in order to meet trigger concentrations set in TR12.



2. Are the reported analytical concentrations total or dissolved values?

CEMEX Response:

Reported analytical concentrations are Total values (unfiltered).

3. For CEMS-005 the table states there was insufficient volume to sample. The Division is aware that in the past there was water in the well but there was not enough to purge and sample the well, the well is low yielding. Please indicate if there was groundwater in the well and if so what the saturated thickness was.

CEMEX Response:

As stated in Technical Revision 8, compliance well CEM-005 is included in the groundwater monitoring plan but has been concluded to be low yielding and not hydraulically connected with water in C-Pit. The Fort Hays Limestone that it is completed in does not transmit water down dip of the CEMEX property. Water level detection and well purging occur during quarterly monitoring but the groundwater does not recharge in sufficient time to collect a sample.

4. Please provide graphs for analyte concentrations for each location that depict trends over the last eight (8) quarters.

CEMEX Response:

Graphs depicting analyte concentrations over the past eight (8) quarters for each CEM-001, CEM-004, and C-pit are enclosed as Figures A, B, and C, respectively.

If there are any questions regarding this Response Letter, please feel free to contact me at scotta.harcus@cemex.com or via phone at 303-823-2124.

Best Regards,

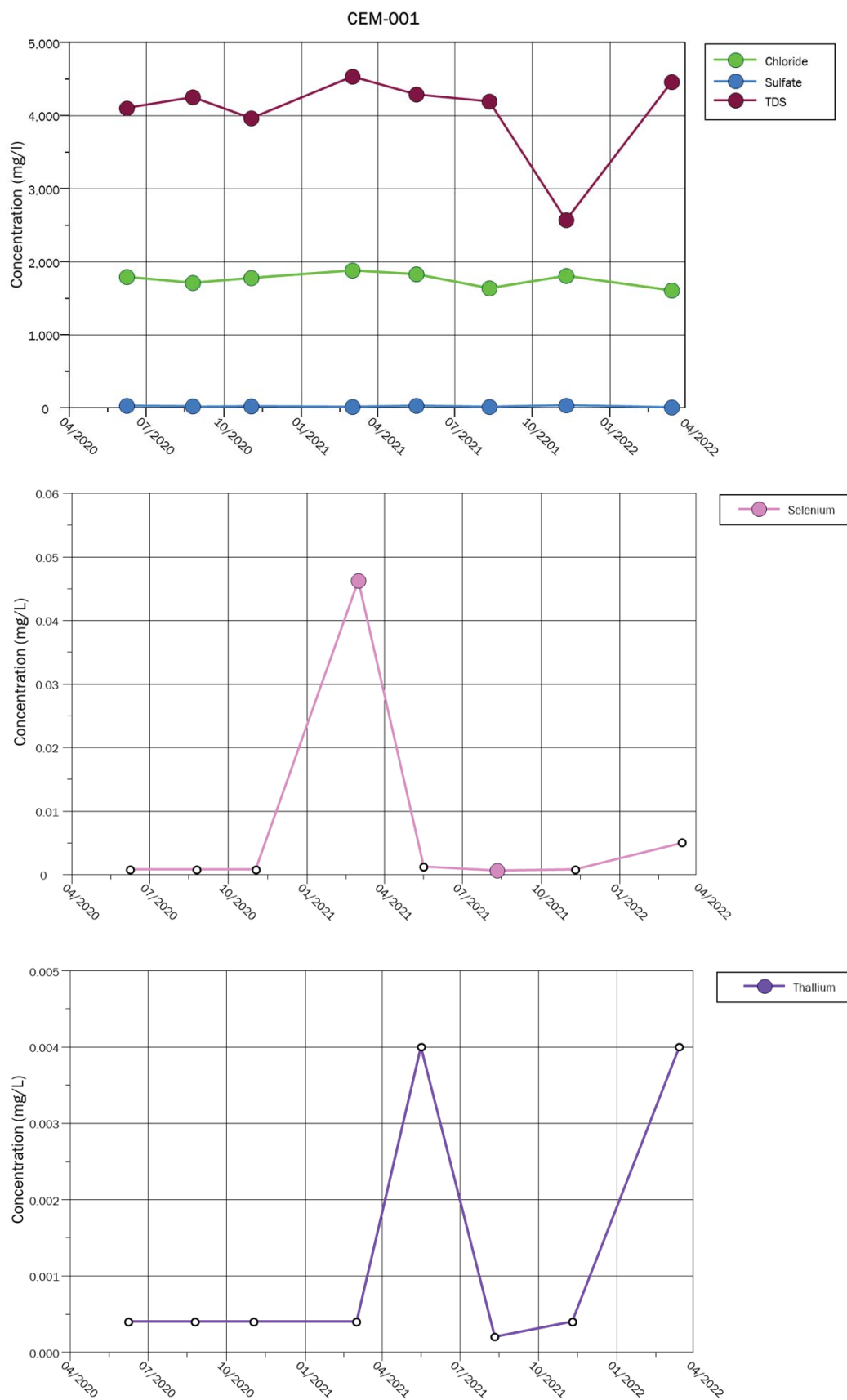
Scott A.
Harcus

Digitally signed by Scott
A. Harcus
Date: 2022.06.03
13:47:45 -06'00'

Scott A. Harcus
Lyons Plant
Environmental Manager

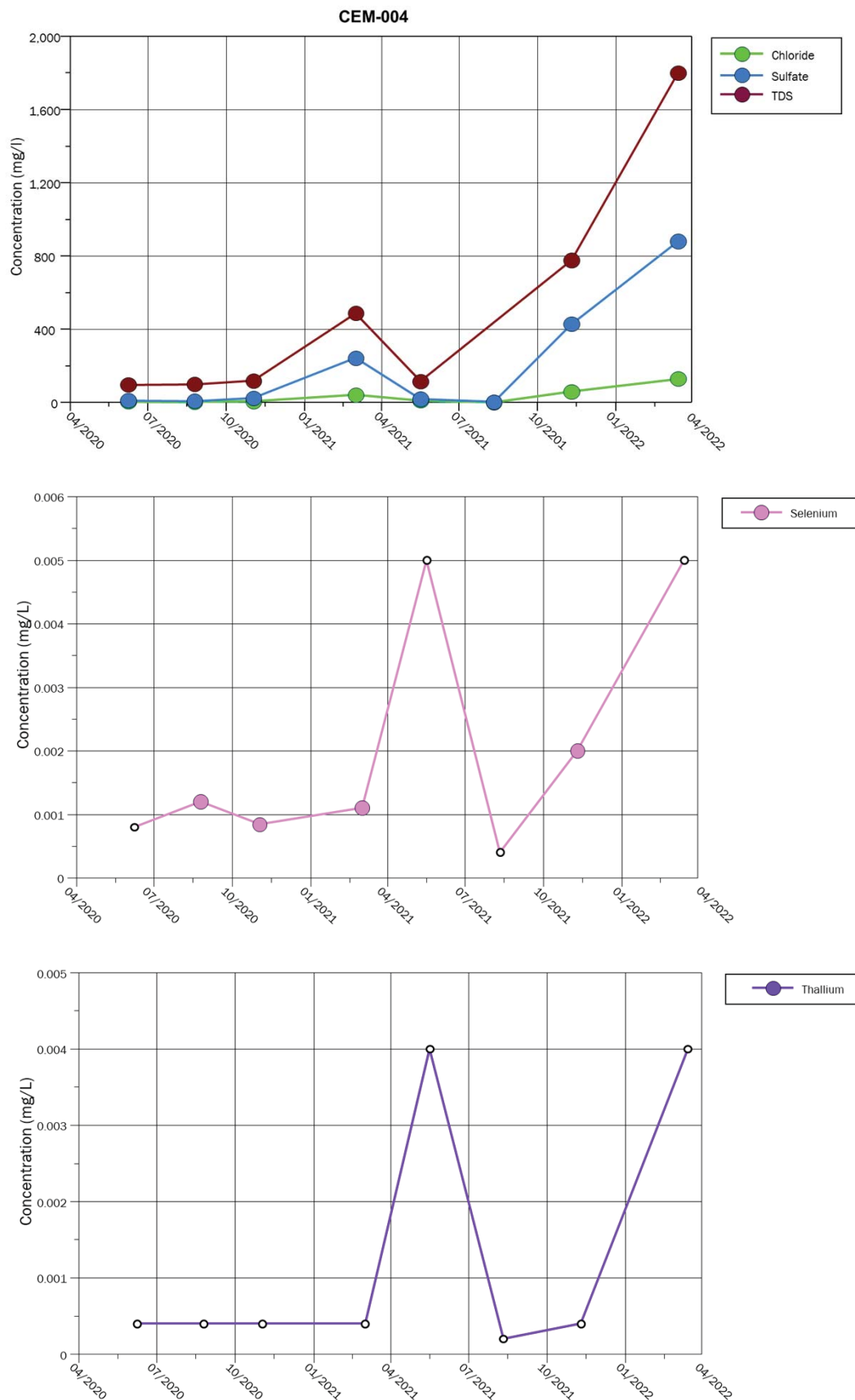
ENCLOSURES:

- Figure A: CEM-001 Analyte Concentrations Graph
- Figure B: CEM-004 Analyte Concentrations Graph
- Figure C: C-Pit Analyte Concentrations Graph



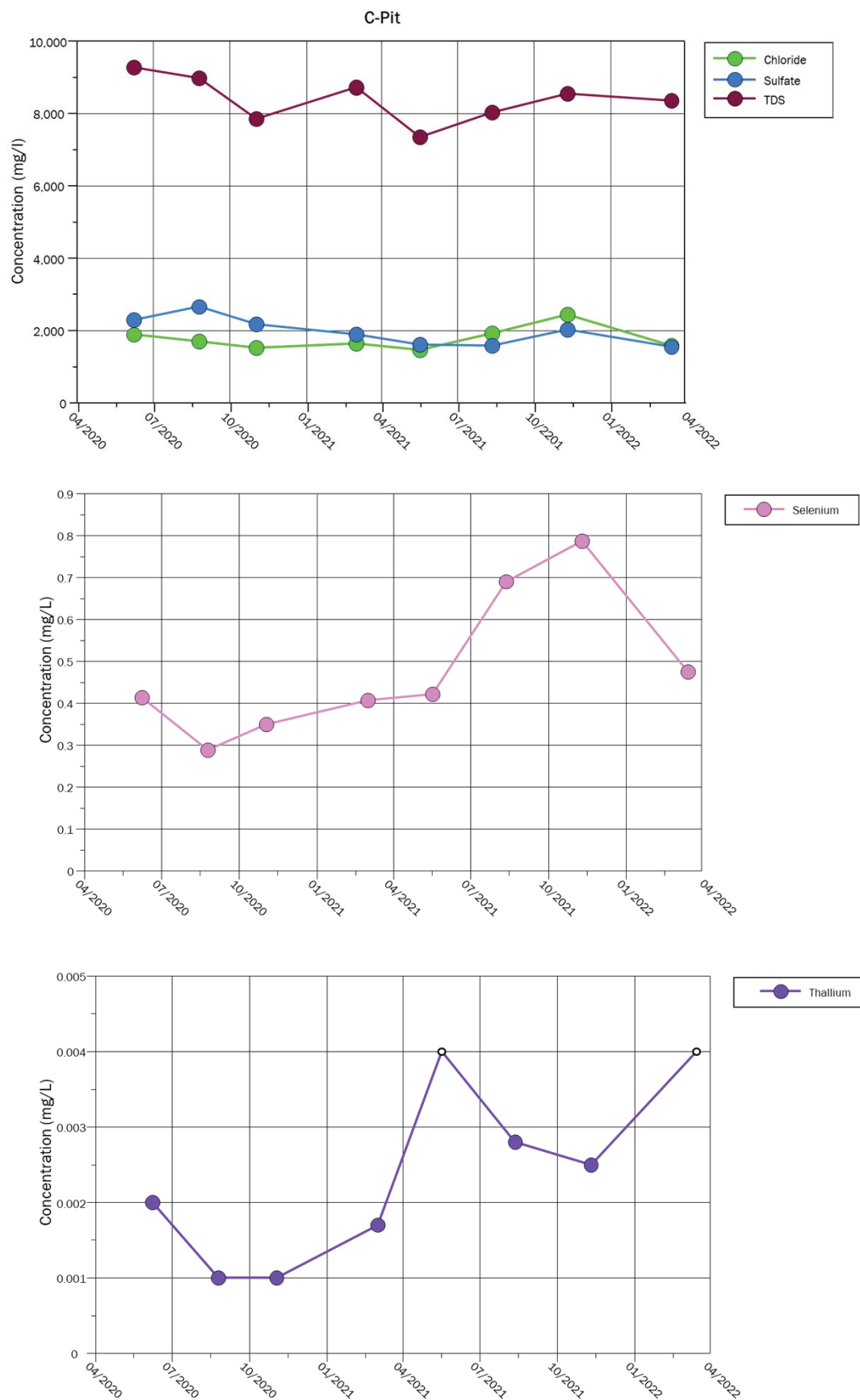
Note: Concentrations reported below the detection limit are plotted as open symbols

Figure A Time trend plots for CEM-001



Note: Concentrations reported below the detection limit are plotted as open symbols

Figure B Time trend plots for CEM-004



Note: Concentrations reported below the detection limit are plotted as open symbols

Figure C Time trend plots for C-Pit