

Mrs. Amy Eschberger Environmental Protection Specialist Division of Reclamation, Mining and Safety Room 215 1001 E 62nd Ave Denver, CO 80216

Via DRMS e-PERMITTING and Email

RE: Lyons Quarry; DRMS File No. M-1977-208; Technical Revision 17 – Material Handling Plan including Dust Control Measures

Dear Amy Eschberger:

CEMEX proposes a Technical Revision 17 to the Lyons Quarry DMRS File No. M-1977-208 to update the Material Handling Plan for Lyons Quarry which includes dust control measures at the Cement Kiln Dust (CKD) disposal area located in C-Pit.

Technical Revision 17 addresses the Corrective Actions prescribed in your Mineral Program Inspection Report of March 10, 2022.

Details of C-Pit Material Handling Plan are as follows:

- CKD disposal activity is to be sequenced to minimize emissions and mitigate potential wind erosion events.
- At the disposal site, the material shall be compacted and stabilized to minimize emissions.
- Operate an automated sprinkler system to water the active CKD disposal site.
- Water trucks will be used to water the active CKD disposal area as follows:
 - The access road will be watered at least every three hours during the day, and as needed at night to minimize fugitive emissions. Watering may be reduced or suspended during cold weather if the road is ice covered and such ice cover is sufficient to minimize fugitive emissions.
 - When the sprinklers are not in service, water trucks will be used to water the active disposal area at least every 3 hours during the day, and as needed at night to minimize fugitive emissions.
- Haul roads to C-pit shall be treated with chemical dust suppressants at a minimum of every 6 months, or as often as required, to maintain a surface crust.
- The active CKD disposal area may be treated with chemical dust suppressants to minimize the generation of fugitive emissions, as necessary.



- Moisture content of the materials prior to transfer to pug mill and into Haul Truck shall be adequate to effectively control emissions.
- Large capacity Haul Trucks shall be used to minimize the vehicle miles traveled.
 Spillage and exposure to wind shall be minimized by restricting the material load to 75 percent of the volume capacity of the Haul Trucks.
- Moisture content of the materials handled by grading or compaction equipment shall be adequate to effectively control the emissions.
- Grading, Compaction, or Hauling activities shall be suspended when the wind speed reaches or exceeds 30 m.p.h., averaged over a 60-minute period. Activities may continue when the average wind speed drops below 30 m.p.h.

As additionally requested, this submittal includes a C-pit survey conducted on April 16, 2022, showing the current exposed CKD area at 6.08 acres.

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

Best Regards,

Scott Harcus

CEMEX, Inc.

Lyons Quarry
"C-pit"
CKD Landfill

DRMS Permit No. M1977-208

Drone Flight
Survey
Conducted on
4/16/2022

