




MINERALS PROGRAM INSPECTION REPORT
PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Irwin/Thomas Mine	MINE/PROSPECTING ID#: M-2016-054	MINERAL: Sand and gravel	COUNTY: Boulder
INSPECTION TYPE: Surety-Related Inspection	INSPECTOR(S): Patrick Lennberg	INSP. DATE: August 26, 2022	INSP. TIME: 12:30
OPERATOR: Holcim - WCR, Inc.	OPERATOR REPRESENTATIVE: None	TYPE OF OPERATION: 112c - Construction Regular Operation	

REASON FOR INSPECTION: Surety Related	BOND CALCULATION TYPE: Complete Bond	BOND AMOUNT: \$2,747,911.00
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None
WEATHER: Clear	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: August 30, 2022

The following inspection topics were identified as having Problems or Possible Violations. OPERATORS SHOULD READ THE FOLLOWING PAGES CAREFULLY IN ORDER TO ASSURE COMPLIANCE WITH THE TERMS OF THE PERMIT AND APPLICABLE RULES AND REGULATIONS. If a Possible Violation is indicated, you will be notified under separate cover as to when the Mined Land Reclamation Board will consider possible enforcement action.

INSPECTION TOPIC: Hydrologic Balance

PROBLEM: During the original permitting process the Operator committed to submitting monthly groundwater level measurements with the annual report. To date no groundwater measurements have been submitted to the Division and this is a problem pursuant to Rules 1.15(1)(c) for failure to submit monitoring data as part of an approved reclamation plan, Rule 3.1.6 for failure to demonstrate that affects to hydrologic balance have been minimized. Additionally, not submitting the monitoring data also is a problem pursuant to C.R.S 34-32.5-124 for not complying with a permit condition.

CORRECTIVE ACTIONS: The Operator shall, by the corrective action date, submit all groundwater monitoring data collected to date in tabular form with graphs depicting historical levels over time for each location.

CORRECTIVE ACTION DUE DATE: 10/31/22

OBSERVATIONS

This was a surety-related inspection of the Irwin/Thomas Mine (M2016-054) conducted by Patrick Lennberg of the Division of Reclamation, Mining, and Safety (Division/DRMS) in response to a Succession of Operators application (Revision No. SO-1) that was received by the Division on June 21, 2022 to transfer the permit from Aggregate Industries – WCR, Inc. to Holcim – WCR, Inc. The Division approved SO-1 on July 29, 2022. A representative from successor operator, Holcim – WCR, Inc., was not present during the inspection. The site was previously inspected by the Division on November 5, 2019.

The Irwin/Thomas Mine is located in Boulder County at the southeastern edge of Longmont, Colorado and is accessed from the northeast off N 119th Street. The site is situated at the confluence of Left Hand Creek and St. Vrain Creek. The approved post-mining land use is agriculture. A mine sign was observed at the entrance to the mine as required by Rule 3.1.12. It should be noted the mine sign needs to be updated to reflect the new permittee.

This is a 112c operation permitted for 295.8 acres to mine sand and gravel. The affected area is 295.8 acres but the Operator plans on only affecting 138 acres during mining. Originally the affected land was owned by Golden Farm LTD, City of Longmont, and RLSJ Properties LLC. However in early 2022 there were some land transactions and there are new owners of land to be mined. During a conversation prior to the inspection the Operator was asked about the recent land transactions and they stated they were aware that land had been sold. Also, the Operator is working on an Amendment, to submit to the Division, to address the land transactions, change the permit boundary and update the Mine and Reclamation Plans accordingly.

The currently approved permit area is comprised of four distinct mining areas, separated by Hwy 119, St. Vrain Creek, and the Burlington Northern and Santa Fe (BNSF) railroad. Mining Area 1 is located south of Hwy 119. Mining Area 2 is located north of Hwy 119 and south of the creek. Mining Area 3 is located north of the creek and south of the BNSF railroad, and Mining Area 4 is located north of the BNSF railroad. The maximum mining depth is approximately 25 feet, with the groundwater table expected to be encountered within 5 feet of the ground surface. Areas to be mined will be dewatered prior to excavation, and the water ultimately discharged into the creek under a CDPHE discharge permit. No material processing will occur on site. Pit run material will be hauled off site for direct use or processing elsewhere. On-site raw material may be hauled or conveyed to temporary stockpiles prior to being hauled off site. The Operator will have to get approval of the soon to be submitted amendment prior to initiating mining activities at the site.

The Operator is to collect a minimum of 5 quarters of baseline groundwater level monitoring data for each mining area prior to exposing groundwater in that area. As part of the approved permit the Operator is to submit monthly groundwater levels to the Division with the annual report. The Operator has not submitted any groundwater monitoring data to date and this has been cited as problem in this report, see above.

Additionally, prior to commencing with operations in Mining Areas 3 and 4, the operator must provide demonstration to the Division that a jurisdictional wetland delineation has been performed in these areas and the necessary permit(s) has been obtained from the USACE.

The Division evaluated the financial warranty and determined the current bond amount held by the Division is adequate at this time.

Photographs taken during the inspection are attached.

Please contact Patrick Lennberg (303)866-3567 ext. 8114 or email at patrick.lennberg@state.co.us if you have any questions regarding this report.

Inspection Contact Address

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ec: Wyatt Webster, Holcim – WCR, Inc., wyatt.webster@holcim.com

PHOTOGRAPHS



Photo 1: Mine sign at entrance to permit



Photo 2: Looking north along N 119th St towards the intersection of Hwy 119



Photo 3: Looking west across the Mining Area 1 currently a cultivated field



Photo 4: Looking north from Quail Rd at the ongoing construction of a Costco located in the northwestern corner of Mining Area 1



Photo 5: Looking northeast from S Marin Rd at the Costco construction



Photo 6: Looking east from S Marin Rd along the western permit boundary of Mining Area 1

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

(AR) RECORDS----- <u>N</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>N</u>
(HB) HYDROLOGIC BALANCE----- <u>PB</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>N</u>
(PW) PROCESSING WASTE/TAILING---- <u>N</u>	(SF) PROCESSING FACILITIES----- <u>N</u>	(TS) TOPSOIL----- <u>N</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>Y</u>	(FW) FISH & WILDLIFE----- <u>N</u>	(RV) REVEGETATION---- <u>N</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SP) STORM WATER MGT PLAN---- <u>N</u>	(RS) RECL PLAN/COMP-- <u>N</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) EROSION/SEDIMENTATION--- <u>N</u>	(ST) STIPULATIONS----- <u>N</u>
(AT) ACID OR TOXIC MATERIALS----- <u>N</u>	(OD) OFF-SITE DAMAGE----- <u>N</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited