STATE OF COLORADO

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

Preliminary Adequacy Review, TR-17, Lyons Quarry M1977-208

Scott A Harcus <scotta.harcus@cemex.com> Fri, Sep 30, 2022 at 9:42 PM
To: "Lennberg - DNR, Patrick" <patrick.lennberg@state.co.us>
Cc: Maribel B Aguilos <maribelb.aguilos@cemex.com>

Hello Mr. Lennberg:

Please find the attached letter as a Response to the DRMS Adequacy Review for TR-17.

Let me know if you have any questions or comments.

Regards,

Scott

Scott A. Harcus
Lyons Cement Plant

Environmental Manager
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From: Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>
Sent: Tuesday, September 6, 2022 1:40 PM
To: Scott A Harcus <scotta.harcus@cemex.com>
Cc: Maribel B Aguilos <maribelb.aguilos@cemex.com>
Subject: Re: Preliminary Adequacy Review, TR-17, Lyons Quarry M1977-208

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2 attachments

Lyons Quarry TR-17_RE-Adequacy Review_2022.09.30-signed.pdf
223K

C-Pit Status-Acres_08222022.pdf

125K

September 30, 2022

Mr. Patrick Lennberg
Environmental Protection Specialist *Via Email*
Division of Reclamation, Mining and Safety
Room 215
1001 E 62nd Ave
Denver, CO 80216

RE: Preliminary Adequacy Review; Technical Revision #17 (TR-17);
Lyons Quarry; DRMS File No. M-1977-208;

Dear Mr. Lennberg:

On July 7, 2022, CEMEX received a letter title "Preliminary Adequacy Review; Technical Revision #17 (TR-17)". Following a pair of DRMS-approved extension requests, CEMEX is providing a reply letter as necessitated.

Within the DRMS letter, there were four (4) adequacy items requiring response and/or further documentation as follows:

1. The aerial map provided does not account for all the exposed CKD sideslopes, as requested in the problem citation, especially along the NW edge of the pit. Please provide an updated map that accounts for exposed sideslopes and clearly indicate the total acreage of exposed CKD.

   CEMEX Response:

   See attached Map File "C-Pit Status-Acrews_08222022.pdf" which depicts total surface area including sideslopes. This total exposed CKD area is 6.8 acres.

2. Please provide the sequence of activities that will be followed to minimize emissions and mitigate wind erosion events.

   CEMEX Response:

   The sequence of activities to minimize emissions and mitigate wind erosion will be as follows:
   a. *Before first exposure of CKD to the outdoor environment, the CKD material is pugged (i.e., effectively mixed with water to pelletize)*
   b. *Pug Mill operator observes pug mill outlet to determine if the pug mill operation requires adjustments to achieve adequate moisture content of the pelletized CKD material*
   c. *From Pug Mill into Haul Truck, a Maximum 75% of the truck capacity is ensured by operator.*
   d. *Water Truck escort during material dumping to the active disposal area. Active watering to be provided, as necessary, during dumping.*

e. *Compaction activities occur promptly utilizing heavy equipment causing the least disturbance from the original dump location.*

f. *The Automated Sprinkler system waters the active disposal area for 15 minutes every 2 hours to develop a crusting of the material. When the sprinklers are non-operational due to freezing conditions or system maintenance, the water trucks will be used to water the active disposal area at least every 3 hours during the day, and as needed at night.*

3. Please provide more details on how the moisture content will be managed prior to transfer to the pug mill and again into the haul trucks.

CEMEX Response:

The CKD is in an enclosed system prior to arrival at the Pug Mill. Once at the Pug Mill, the CKD material is effectively mixed with water to pelletize or congeal the fine particles, thus minimizing the emissions as it exits the mill (and during transport). The Pug Mill then unloads the pelletized mixture into the back of the Haul Truck in preparation to be transported to the active disposal area.

4. Please provide more details on how the moisture content will be managed and handled by grading or compaction equipment to control CKD dust emissions.

CEMEX Response:

At the exit of the Pug Mill, sufficient moisture content is verified by the equipment operator as pelletized. Pug Mill settings may be adjusted as necessary to ensure successful material coagulation in mitigating dusting scenarios.

At the dumping location, the water truck operator may add water to the material during active dumping by using either the onboard water cannon or front truck nozzle sprays.

Compaction of the material occurs promptly utilizing heavy equipment (e.g., front loader and/or bulldozer). The elected heavy equipment will be chosen such to cause the least disturbance from the original dump location.

TR-17 and the responses herein targets to address the Corrective Actions prescribed in the DRMS Mineral Program Inspection Report of March 10, 2022.

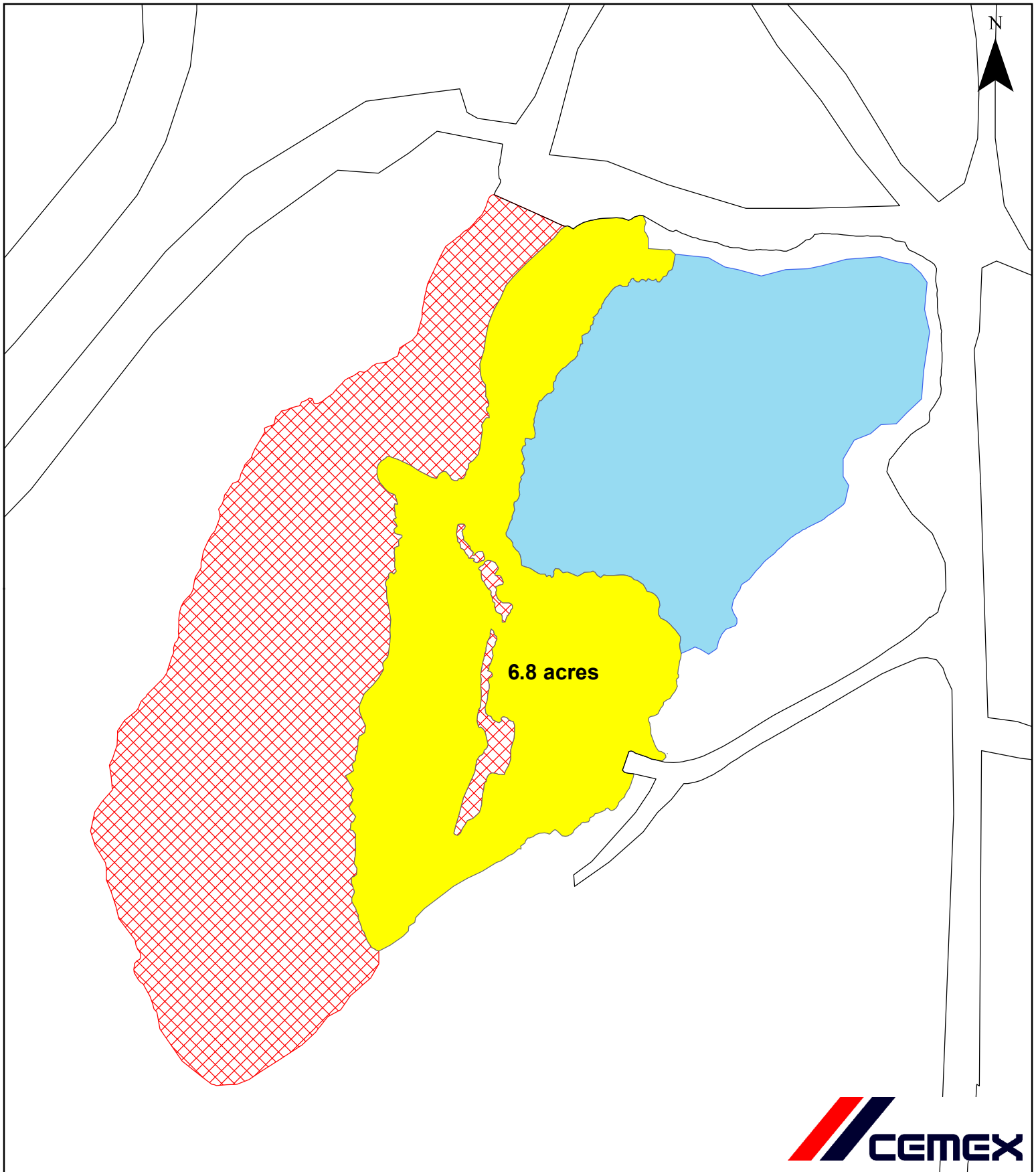
If there are any questions regarding the responses or enclosed CKD Map, please feel free to contact me at scotta.harcus@cemex.com or via phone at 303-823-2124.

Best Regards,

Scott Harcus

Enclosures: – CKD Uncapped Area Map: Attached "C-Pit Status-Acres_08222022.pdf"

United States Operations
P O Box 529, Lyons, CO 80540, USA, Phone (303) 823-2100, Fax (303) 823-2199



Temporary Cap

Not Currently Capped

Water

0 0.0475 0.095 Miles

Lyons Quarry C-Pit Status

Permit #M-1977-208

Prepared By:

Habitat Management

www.habitatmanagementinc.com

Drawn By: RFB

Approved By: PC

Mapped: 8/22/2022

Drawn: 8/29/2022