



## Interoffice Memorandum

To: File  
From: Rob Zuber *RZ*  
Date: November 18, 2022  
Subject: Delta Paving AM-01 (M-1998-105),  
Groundwater review – memorandum from Leigh Simmons

Regarding the applicant's adequacy response for this amendment, received by the Division on 28 September 2022, Leigh Simmons wrote the following memorandum. This was emailed to the applicant (Jim Doody, Grand Junction Pipe & Supply Co.) and consultant (Ben Langenfeld of Lewicki and Associates) on 8 November 2022.





Interoffice Memorandum

November 8, 2022

From: Leigh Simmons  
To: Rob Zuber

**Subject: Delta Paving (Permit No. M-1998-105)  
AM-1**

As you requested, I reviewed the material submitted with the Delta Paving AM-1 application pertaining to the proposed groundwater monitoring plan.

Information relating to groundwater is given in Exhibit G, Section 7, and the groundwater monitoring plan is described in Appendix G-2.

The proposed plan is to monitor a single monitoring well (GW-1), located at the north-west corner of the Phase 3 pit, between the pit and the Gunnison River. This location is appropriate for a point of compliance since it is downgradient of the disturbance proposed with AM-1 (Phase 3 and 4 pits). No downgradient monitoring of the previously permitted disturbance has been proposed; since baseline monitoring data is unavailable it is not clear that such monitoring would be of value unless there is a specific reason to begin collecting data now.

As well as a description of the sampling location, Appendix G-2 gives descriptions of the sampling frequency, the parameters that will be monitored, and the sampling procedure. The text correctly refers to the Interim Narrative Standard of Regulation 41, The Basic Standards for Groundwater, as the applicable standard at the site, and describes reporting and exceedance mitigation procedures. Generally the plan is appropriate for the site.

I have the following minor adequacy items:

1. Please revise Sections 1.1 and 1.2 of Appendix G-2 to specify that at least 5 quarters of monitoring data will be collected prior to any disturbance associated with the Phase 3 and Phase 4 pits.
2. Please revise Section 1.2 of Appendix G-2 to specify that an approved Technical Revision will be in place before any future reduction in sampling frequency.

