




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: Lyons Quarry	MINE/PROSPECTING ID#: M-1977-208	MINERAL: Limestone (general)	COUNTY: Boulder
INSPECTION TYPE: Monitoring	WEATHER: Clear	INSP. DATE: February 13, 2023	INSP. TIME: 08:30
OPERATOR: CEMEX, Inc.	OPERATOR REPRESENTATIVE: Scott Harcus, Cita Cisse, Robin Bay	TYPE OF OPERATION: 112c - Construction Regular Operation	
REASON FOR INSPECTION: Citizen Complaint	BOND CALCULATION TYPE:	BOND AMOUNT: \$8,953,127.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None	
INSPECTOR(S): Patrick Lennberg	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: March 2, 2023	

GENERAL INSPECTION TOPICS

This list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each. No problems or possible violations were noted during the inspection. The mine operation was found to be in full compliance with Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials and/or for Hard Rock, Metal and Designated Mining Operations. Any person engaged in any mining operation shall notify the office of any failure or imminent failure, as soon as reasonably practicable after such person has knowledge of such condition or of any impoundment, embankment, or slope that poses a reasonable potential for danger to any persons or property or to the environment; or any environmental protection facility designed to contain or control chemicals or waste which are acid or toxic-forming, as identified in the permit.

(AR) RECORDS----- <u>N</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>Y</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>N</u>
(PW) PROCESSING WASTE/TAILING---- <u>Y</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>Y</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

OBSERVATIONS

The CEMEX Lyons Quarry was inspected by Patrick Lennberg with the Division of Reclamation, Mining and Safety (Division/DRMS). The inspection was completed in response to three citizen complaints, CT's 3, 4 and 5, the Division received on January 9th and 11th, 2023. The site was last inspected by the Division on March 3, 2022 in response to a citizen complaint received by the Division on January 31, 2022. Scott Harcus, Cita Cisse and Robin Bay representing the Operator, CEMEX, Inc., accompanied me during the inspection. The weather was clear and mild.

The site is 112c Construction Materials permit for 979.54 acres to mine limestone. The mine is located in Boulder County, approximately 2 miles southeast of Lyons, CO. The site is accessed from the north off of Hwy 66. The post-mining land use for this site is pastureland. The affected lands are owned by the Operator. A mine sign was posted at the primary mine entrance as required by Rule 3.1.12.

Two complaints were received by the Division from Sarah Lorang. The first complaint, CT3, was received on January 9, 2023. The complaint contained several concerns including the increase in truck traffic, a statement that the cement plant qualifies as a Custom Mill, concerns regarding the importation of materials for processing, and what permitting action the Operator would have undergo in order to leave the cement plant after the completion of reclamation activities. The second complaint, CT5, was received on January 11, 2023. The concerns contained in CT5 are that there is insufficient financial warranty currently held by the Division to complete reclamation at the site and onsite disposal of rubble should have involved public comment. The Division responded to these concerns on February 7, 2023, see Attachment 1, and considers CT3 resolved. The Operator is in the process of updating the reclamation cost estimate for the site and will be providing that estimate by March 13, 2023 in response to CT5.

Citizen complaint 4, CT4, was received on January 11, 2023 regarding several fugitive dust events originating at the site and travelling offsite to surrounding areas. This inspection is a follow-up to those concerns in CT4.

Air emissions in the state of Colorado are regulated by the Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division (APCD). The operator maintains an air quality permit for the site with the CDPHE, APCD which requires activities causing fugitive dust emissions to be suspended when wind speeds reach or exceed 30 mph, averaged over a 60 minute period. Additionally, in response to a similar event last year the Division cited a problem for dust emission's originating at Pit-C where CKD disposal is occurring. The problem was abated when the Operator submitted a Technical Revision, TR17, updating their CKD disposal handling protocols.

Those protocols are:

- CKD material shall be compacted and stabilized to minimize emissions,
- When weather allows 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 trucks shall be adequate to 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.

The Operator also stated during the inspection that they have increased employee training regarding CKD disposal area to inform them about dust emissions and to allow them to be proactive in mitigating potential dust generating areas. The Operator has also begun to divert some of their CKD material to the oil and gas industry for use in their operations decreasing the amount of CKD needing to be disposed of on-site.

During the inspection the Division used a handheld GPS unit to measure the exposed CKD area of Pit C. The Operator is to limit exposure of CKD in the disposal area to 7 acres or less. The Division measured the exposed area to be approximately 7 acres. As the Division walked the perimeter of the CKD disposal area it noted that the ground was moist from a water truck spraying the area earlier that morning. The Division also noted that a crust had developed in some areas of where the CKD had been disposed and other areas that had yet to be watered. No fugitive dust was observed during the inspection however, wind speeds were low.

Now that the Dowe Flats Mine has entered into final reclamation the Operator is importing material for processing. Shale material is being sourced from the Arcosa mine in Jefferson County, sandstone is being sourced from their sandstone quarry and other quarries along the Boulder and Larimer County border, and limestone is being obtained from a source in north Larimer County. Stockpiles associated with these materials are in constant use. In the Operator's response to the complainant, Attachment 2, they state the plant constantly adjusts the position and shape of the raw material piles to optimize logistical accessibility, traffic flow, and to keep the area safe. Additional employee training including material handling and dust prevention were also completed earlier this year. The Division verified that the Operator uses the water truck to periodically water the piles in an effort to mitigate dust generation.

At this time the Division has determined the Operator is in compliance with TR17 by adequately stabilizing and protecting the CKD disposal area from erosion. The Operator provided documentation, Attachment 3, of the water truck operating in the Pit C area, this documentation is part of their approved air permit obligations. The Operator states they are taking additional steps to mitigate future dust emission events at the site. Finally, in CT4 there is an event that is labeled as January 8, 2022. It appears the year is incorrect and the date of the event is January 8, 2023, this also corresponds with the date of an event the Operator is aware of. The Operator has committed to providing the Division with any follow-up communication regarding the January 8, 2023 event once cause is determined and any further mitigation measures enacted.

The Division considers CT4 resolved 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

Scott Harcus
CEMEX, Inc.
P.O. Box 529
Lyons, CO 80540

Attachments: 1 – Division's Response to CT3/CT5
2 – Operator's Response to CT4
3 – Operator's Truck Logs February 13, 2023

cc: Jared Ebert, DRMS

ec: Scott Harcus, CEMEX, Inc., scotta.harcus@cemex.com

PHOTOGRAPHS



Photo 1: Mine sign at the primary mine entrance



Photo 2: C-Pit area, dark material is shale that has been placed against CKD material



Photo 3: C-Pit area, looking northwest, moist areas from water truck pass, area has also been graded flat and covered with two feet of shale material



Photo 4: C-Pit area, looking southwest, area has also been graded flat and covered with two feet of shale material



Photo 5: Looking north along C-Pit across an area of exposed CKD. Note raw material stockpiles in background.



Photo 6: Looking north along C-Pit across an area of exposed CKD. Note raw material stockpiles in background.



Photo 7: An example of crust that has formed in areas of CKD disposal.



Photo 8: Looking east across C-Pit



Photo 9: Exposed CKD along slopes of C-Pit pond included into the Division's area calculation



Photo 10: Looking east across C-Pit pond area

Attachment 1



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

February 7, 2023

Ms. Sarah Lorang
12800 Foothills Hwy
Longmont, CO 80503

**RE: Response to Citizen Complaints CT3 and CT5; Lyons Quarry;
Permit File No. M-1977-208;**

Dear Ms. Lorang,

On January 9, 2023 and January 11, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your two written complaints (CT3 and CT5), regarding the Lyons Quarry. The Division has reviewed your concerns and below you will find the Division's responses to the items contained in the complaints.

Citizen Complaint CT-3

Increase in truck traffic: The Division does not have jurisdiction over complaints regarding the increase in truck traffic at the site and those complaints are best addressed through Boulder County.

Custom Mill: The term milling is used to describe extractive metallurgical processing as presented in the Hard Rock, Metal, and Designated Mining Operations Rules. The Lyons Quarry is a Construction Materials operation and therefore not subject to the Hard Rock Rules.

Current Activities at the Lyons Quarry: Pursuant to Construction Materials Rule 1.1(30) a Mining Operation includes transportation or processing on affected lands. Currently approved site operations are included in that definition, and the Division finds that a revision to the Lyons Quarry permit is not necessary or required.

Leaving the Cement Plant: If the Operator wanted to change the currently approved permit in a way which has a significant effect upon the approved Reclamation Plan they would have to submit an Amendment Application. At this time the Division would consider leaving the plant a significant change.

Citizen Complaint CT-5

Inadequate Surety Bond: The Division has initiated a review of the adequacy of the current required surety. If it is determined the reclamation liability exceeds the current required surety, the Division will



issue a Surety Increase notice to the Operator and they will have 60 days from that date to amend the current Financial Warranty or submit a new Financial Warranty.

Reclamation Plan: In September of 2003, the Division approved Technical Revision No. 2 (TR2) allowing on-site disposal of concrete rubble for use at the close and demolition of the concrete plant. The Division finds that a revision to the Lyons Quarry permit is not necessary or required at this time for this activity.

If you need additional information or have any questions, please contact me by telephone at **303-866-3567 x8114**, or by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

cc: Jared Ebert, DRMS

ec: Scott Harcus, CEMEX, Inc., scotta.harcus@cemex.com

Attachment 2



Notice of Formal Complaint, CT-4, Lyons Quarry, M1977-208

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

Thu, Feb 9, 2023 at 6:16 PM

To: "patrick.lennberg@state.co.us" <patrick.lennberg@state.co.us>

Cc: Maribel B Aguilos <maribelb.aguilos@cemex.com>, Cita Cisse <cita.cisse@cemex.com>, Erik Estrada <erik.estrada@cemex.com>, Lillian F Deprimo <lillianf.deprimo@cemex.com>, Sandra P Velasco <sandrap.velasco@cemex.com>

Hello Patrick,

Please find CEMEX's response to the Notice of Formal Complaint, CT-4 at Lyons Quarry.

A hard copy will not be mailed unless specifically requested.

Let me know if you have any 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: Thursday, January 12, 2023 3:27 PM

To: Scott A Harcus <scotta.harcus@cemex.com>; Maribel B Aguilos <maribelb.aguilos@cemex.com>; Cita Cisse <cita.cisse@cemex.com>; Erik Estrada <erik.estrada@cemex.com>

Subject: Notice of Formal Complaint, CT-4, Lyons Quarry, M1977-208

CAUTION: External Email | PRECAUCIÓN: Correo electrónico externo | VORSICHT: Externe E-Mail | ATTENTION: Courriel externe [Learn more](#)

[Quoted text hidden]

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.



DRMS - CX Response Letter - CT4 Filed 01-11-2023 - 02.09.23_signedSAH.pdf

386K



February 9, 2023

VIA E-MAIL

Patrick Lennberg
Environmental Protection Specialist
Colorado Department of Natural Resources
Division of Reclamation, Mining and Safety
patrick.lennberg@state.co.us

RE: Response to Citizen Complaint, CT-4, Lyons Quarry; Permit File No. M-1977-208

Dear Patrick Lennberg:

We acknowledge receipt of your Notice of the referenced Citizen Complaint, CT-4, dated January 12, 2023, and would like to respond to the complainant's assertion that the Lyons Quarry "consistently omits [sic] large amounts of dust (potentially toxic CKD) which blows to the surrounding areas."

RESPONSE: The link that the complainant submitted evidencing the "consistent emissions of dust" contained four panoramic photos of four dusting events labeled January 8, 2022, December 19, 2022, and two events labeled December 21, 2022. CEMEX seeks to avoid and mitigate dusting events to the greatest extent possible, and is successful in preventing such events during the majority of its operations. CEMEX responded to the Colorado Department of Public Health & Environment, Air Pollution Control Division ("CDPHE"), and the Boulder County Public Health Department ("BCPHD") on January 31, 2023, as to the source and cause of the December events after the complainant also notified those departments of the events. A copy of the communication to CDPHE and BCPHD is attached to this letter. We are in the process of determining the causes and mitigation actions required for the January 8th event, which we assume should have been labeled "January 8, 2023." We will provide you with any follow up communication with CDPHE and BCPHD concerning those determinations.

In addition to CEMEX's own internal monitoring and root-cause analysis of any dusting events, DRMS inspected the CKD and materials stockpile areas at the Lyons Quarry on March 3, 2022, in response to a complaint filed with DRMS on February 8, 2022, for a dust event observed on January 31, 2022. After the inspection was completed, DRMS requested that CEMEX submit a Technical Revision with a revised CKD Handling Plan and Associated Dust Control Measures. CEMEX submitted Technical Revision #17 on June 30, 2022, which DRMS approved on November 3,

Patrick Lennberg
February 9, 2023
Page 2

2022. CEMEX continually refines and improves its material handling procedures, and ensures that all of its personnel are trained, and retrained as necessary, in their implementation.

Please let us know if you require any additional information, documentation or discussion for this response.

Sincerely,

CEMEX

By: _____
Scott Marcus
Environmental Manager
Lyons Cement Plant

Attachment



BoCo Health
Exchange.pdf

From: Scott A Harcus
Sent: Tuesday, January 31, 2023 3:44 PM
To: Gabi Hoefler (ghoefler@bouldercounty.org)
Cc: Dave Huber (david.huber@state.co.us); Michael Clausen; Erik Estrada
Subject: RE: [EXTERNAL] Multiple Fugitive Dust Events at CEMEX Lyons

Hi Gabi –

The amount of raw materials at the Lyons Plant has always varied over time. The plant constantly adjusts the position and shapes of the raw material piles to optimize logistical accessibility and traffic flow, and to keep the area safe.

Key components of Cemex's 2023 training campaign at Lyons, now underway, include material handling and dust prevention. The plant is constantly evaluating alternative control measures to improve our operation.

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: Hoefler, Gabi <ghoefler@bouldercounty.org>
Sent: Thursday, January 26, 2023 9:15 AM
To: Scott A Harcus <scotta.harcus@cemex.com>; Dave Huber (david.huber@state.co.us) <david.huber@state.co.us>
Cc: Michael Clausen <michael.clausen@cemex.com>; Erik Estrada <erik.estrada@cemex.com>
Subject: RE: [EXTERNAL] Multiple Fugitive Dust Events at CEMEX Lyons

CAUTION: External Email | PRECAUCIÓN: Correo electrónico externo | VORSICHT: Externe E-Mail | ATTENTION: Courriel externe [Learn more](#)

Scott,

Thank you for the response to the dust events witnesses. The last caller I spoke with indicated the stock pile area is much larger now and appears to be the source of many of the dust events. I'm guessing the plant is storing a larger amount of material on site now that Dowe Flats is no longer being mined? Has the plan considered additional control measure to address more activity on the plant side?

Gabi Hoefler
BCPH
303-441-1147

From: Scott A Harcus <scotta.harcus@cemex.com>
Sent: Wednesday, January 25, 2023 5:10 PM
To: Hoefler, Gabi <ghoefler@bouldercounty.org>; Dave Huber (david.huber@state.co.us) <david.huber@state.co.us>
Cc: Michael Clausen <michael.clausen@cemex.com>; Erik Estrada <erik.estrada@cemex.com>
Subject: RE: [EXTERNAL] Multiple Fugitive Dust Events at CEMEX Lyons

Hello Dave and Gabi –

Below are the details for the events of 12/19 and 12/21/2022:

12/19/2022

- At approximately 13:34 MST, a load of material was hauled to C-pit without a Water Truck escort. Personnel was retrained on the procedure. Operations is to dump only in designed dumping area(s).

12/21/2022

- From approximately 08:36 MST to 08:40 MST, fugitive dusting appears to have occurred for 4 minutes during routine resurfacing and stockpile management activities at the Raw Material Stockpile area at the south end of the plant. Water truck was utilized to wet down material and area before and during the activity. Personnel has been retrained on the procedures for such activities. High winds were increasing steadily in the region during this time.
- At approximately 10:58 MST, fugitive dusting appears to have coincided with front loader activity as the Limestone stockpile was being reshaped and pushed up into a smaller footprint. Water truck was utilized across the plant and specifically enlisted to wet down material/area before and during the activity. Personnel has been retrained on the procedures for such activities. Major wind event with gusts around 40 mph occurred during this time including sustained winds of 15-25 mph throughout the region from 10am-5pm.

These events have been documented in the Lyons Fugitive Dust Log.

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: Huber - CDPHE, David <david.huber@state.co.us>

Sent: Monday, January 23, 2023 11:07 AM

To: Hoefler, Gabi <ghoefler@bouldercounty.org>

Cc: Scott A Harcus <scotta.harcus@cemex.com>; Michael Clausen <michael.clausen@cemex.com>; Erik Estrada <erik.estrada@cemex.com>

Subject: Re: [EXTERNAL] Multiple Fugitive Dust Events at CEMEX Lyons

CAUTION: External Email | PRECAUCIÓN: Correo electrónico externo | VORSICHT: Externe E-Mail | ATTENTION: Courriel externe [Learn more](#)

Scott,

Can you please respond to this inquiry.

Thanks,

Dave Huber

Environmental Protection Specialist

Compliance and Enforcement Program
Air Pollution Control Division
Colorado Department of Public Health & Environment



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

P [303.692.3154](tel:303.692.3154) | C [720.584.0804](tel:720.584.0804) | F [303.782.0278](tel:303.782.0278)
4300 Cherry Creek Drive South, Denver, CO 80246
david.huber@state.co.us | www.colorado.gov/cdphe/apcd

On Mon, Jan 9, 2023 at 9:54 AM Hoefler, Gabi <ghoefler@bouldercounty.org> wrote:

Hi Scott,

I never received a response to the dust events detailed below. Please provide a response for the events that occurred from December 19-21st.

Thanks,

Gabi Hoefler

From: Hoefler, Gabi
Sent: Wednesday, December 21, 2022 12:09 PM
To: Scott A Harcus <scotta.harcus@cemex.com>; Michael Clausen <michael.clausen@cemex.com>; Erasmo Estrada Tovar <erik.estrada@cemex.com>
Cc: David Huber - CDPHE <david.huber@state.co.us>
Subject: FW: [EXTERNAL] Multiple Fugitive Dust Events at CEMEX Lyons
Importance: High

Scott,

We received the complaint below documenting multiple dust event in the last two days. While wind speeds have been high off and on, Cemex should be taking preventative measures to reduce these kind of events. Please provide a response documenting the reason for the 3 events and corrective action, as well as preventable measure that will be employed.

Gabi Hoefler

Boulder County Public Health

From: Wylie Hobbs <wylie@wyliehobbs.com>

Sent: Wednesday, December 21, 2022 11:47 AM

To: Hoefler, Gabi <ghoefler@bouldercounty.org>; david.huber@state.co.us; Case, Dale <dcase@bouldercounty.org>; cdphe.APCD@state.co.us; Boulder County Board of Commissioners <commissioners@bouldercounty.org>

Hello Inspectors Huber and Hoefler,

Just in time for Christmas, we've had a wild amount of large dust events at CEMEX Lyons. I am positive I did not capture the full extent of what has been happening, these events are certainly ramping up in frequency and damage.

I am documenting them starting on 12/19 on the SOSVV website and will work on backdating events as I can. You can now see a birds-eye view of the events here:

<https://www.sosvv.org/cemex-fugitive-dust-events>

There have been 3 major events I have captured since 12/19 but in general, the area has been emitting large amounts of dust quite consistently over the past several weeks (not always easy to capture from my location though):

[December 19th at 13:34 MT](#)

[December 21 at 08:36 MT](#)

[December 21 at 10:58 MT](#)

Please let me know if this is an acceptable method of reporting. Hope you have safe, happy and dust free holidays!

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.

Attachment 3

Daily Environmental Report: WATER TRUCK



Water truck must be operated during the day shift 12 hours a day, 7 days a week except when any of the following conditions exists: a freezing condition, snow/ice covered roads, rain or a shutdown of the kiln and O2 system for greater than 24 hours. This form must be filled out in its entirety by the Water Truck Operator, and then reviewed by the Day Shift Supervisor for accuracy and completeness. On page 2, record the engine's startup and shutdown times every time you use the pump to load water from A-Pit.

Operator(s) (PRINT NAME) Cotton Hebbelton Date: 2-13-23

Start time: 0600 End time: 1800 No. of Loads: 2

°Freezing? YES ☐ NO ☒ °Snow/Ice on ground? YES ☐ NO ☒ °Wet ground? YES ☒ NO ☐

Not Operating: Check the reason why the water truck was down and note how long.

☐ Kiln and O2 system down for the past 24 hours and still down (hrs. down: _____)

☐ Ice, snow, or rain covering plant grounds (hrs. down: _____)

☐ Freezing conditions (hrs. down: _____)

☐ Water Truck Maintenance (hrs. down: _____)

☐ Other _____ (hrs. down: _____)

Watering: Indicate in the space provided whether the following areas were covered:

AREAS	YES	NO
CKD Pit access road/ramp (Must be watered <u>at least</u> every 3 hours)	X	
CKD Pit active disposal area (must be watered <u>at least</u> every 3 hours when sprinklers are not in service.	X	
South and West Side of A-Frame	X	
Area West of Railroad Tracks (Coal Storage)	X	
Patio Area and West Ramp by Vehicle Shop	X	
East Haul Road, including Road to Patio	X	
Hot Clinker Pit Area	X	
Other area (s) watered:		
o All PAVED areas in the plant from north to south.		
o <u>Sweeper running</u>		
o _____		

Application of Calcium Chloride/Other Chemical Dust Suppressant: Gallons applied: _____

Check areas covered: °East Haul Road _____ °Plant Patio Area and Ramp _____ °Dust Pit Ramp _____

°CKD Pit Disposal Area _____ °West side of A-Frame _____ °Hot Clinker Pit Area _____

°Dowe Flats Unpaved Haul Roads _____ °Dowe Flats Patio Area _____

Notes/Other Observations: _____

Shift Supervisor's Initials EH Review Date 2/13/23

Daily Environmental Report: WATER TRUCK



Water truck must be operated during the day shift 12 hours a day, 7 days a week except when any of the following conditions exists: a freezing condition, snow/ice covered roads, rain or a shutdown of the kiln and O2 system for greater than 24 hours. This form must be filled out in its entirety by the Water Truck Operator, and then reviewed by the Day Shift Supervisor for accuracy and completeness. On page 2, record the engine's startup and shutdown times every time you use the pump to load water from A-Pit.

Load No.	Did idle time (without load) ever exceed 30 minutes? (Y/N)*	Engine Startup Time (MDT/MST)	Engine Shutdown Time (MDT/MST)
1	N	0827	0815
2	N	1100	1115
3			
4			
5			
6			
7			
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***If YES, a 6-minute Method 9 MUST be performed by a certified observer.**