



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

March 21, 2023

Amy Veek  
GCC Rio Grande, Inc.  
3372 Lime Road  
Pueblo, CO 81004

**RE: Additional Information Requested; 2022 Annual Groundwater Report; Pueblo Cement Plant, Permit No. M-2002-004**

Dear Ms. Veek,

On January 31, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your 2022 Annual Groundwater Report for the Pueblo Cement Plant, Permit No. M-2002-004. After review of the submission the Division has additional items that need to be addressed or clarified. Please respond to the following:

1. In the Groundwater Monitoring Data Collection section it is stated that all wells were sampled according to the methods in the approved TR-11. A review of the field sheets in Attachment 1 indicates there is information missing that demonstrates stability was achieved when three consecutive measurements did not vary more than 3% for conductivity and temperature, +/- 10 millivolts for ORP and +/- 0.1 standard units for pH and well purging was done at the lowest rate on the order of 0.03 to 0.1 gpm. Please provide information that demonstrates the stated conditions were met. If sampling deviated from the approved methods please provide an explanation.
2. Table 2 needs to be updated to bold the sample results that exceed the standard, e.g. Fluoride, Arsenic, Cadmium, Cobalt, Lead and Selenium all have exceedances that need to be revised.
3. Table 2 needs to be updated to show the standard each analyte is compared to.
4. Footnotes need to be added to Table 2 for Boron to show applicable standard for boron is 5.0 mg/L (footnote "g" from Regulation 41.8 Table 3) and the TDS standard is <10,000 mg/L.
5. In Table 2, analyte results from samples that exceeded hold times need to be clearly indicated, e.g. 1Q2022 nitrite and nitrate/nitrite in MW-7 and MW-13, and TDS values for MW-9, MW-13, and duplicate for MW-7.



6. Please provide a general stratigraphic column for the site.
7. Please provide a more detailed discussion on how impacts from mining may or may not be the cause of exceedances seen at the site. Include in this discussion how current mining activities are being conducted to leave a limestone floor behind rather than removing material into the sandstone and beneficially reusing CKD as backfill during reclamation. The discussion should include details of how groundwater flows across the site.
8. Please provide a discussion of how the stormwater detention basin and leech field may or may not be impacting MW-13 and 14.
9. A section needs to be added that discusses any site data gaps that have been identified, if any, that need to be addressed to help refine the current site model. At this time the Division anticipates additional monitoring wells need to be installed both upgradient and downgradient of mine panels that have not yet been affected by mining and wells to better quantify background/baseline groundwater conditions. Finally, a discussion about a new point-of-compliance well(s) needs to be included.

This concludes the Division's review of the 2022 Annual Groundwater Report. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

The due date for your response has been set for **April 20, 2023**.

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](mailto:patrick.lennberg@state.co.us).

Sincerely,



Patrick Lennberg  
Environmental Protection Specialist

cc: Jared Ebert, DRMS  
Amber Michels, DRMS  
Nikie Gagnon, DRMS

ec: Amy Veek, GCC Rio Grande, [aveek@gcc.com](mailto:aveek@gcc.com)  
Landon Beck, Resource Hydrogeologic Services, [lbeck@resourcehydrogeologic.com](mailto:lbeck@resourcehydrogeologic.com)