

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

June 13, 2023

Joey Parrish GCC Rio Grande, Inc. 3372 Lime Road Pueblo, CO 81004

Re: DRMS Response to GCC's Second Adequacy Response for the Pueblo Cement Plant and Quarry M-2002-004 2022 Annual Groundwater Report

Dear Mr. Parrish

On June 6, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's second adequacy review regarding your 2022 Annual Groundwater Report submission for the Pueblo Cement Plant, Permit No. M-2002-004. After reviewing your responses, the Division would like to clarify the following:

- 1. The Division, starting with the Second Quarter 2023, will require the Operator to begin submitting Quarterly Groundwater Monitoring Reports to demonstrate sampling can be conducted according to the approved methods and plans in the permit and consistent with industry standards. Collection of representative groundwater samples is required to demonstrate that affects to hydrologic balance are being minimized pursuant to Rule 3.1.6. The due dates for the quarterly groundwater monitoring reports are as follows:
 - First quarter report due by May 1st of every year.
 - Second quarter report due by August 1st of every year.
 - Third quarter report due by November 1st of every year.
 - Fourth quarter report due by February 1st of the following year.

Once the Operator has sufficiently demonstrated that samples can be collected in accordance with the approved methods the Division may allow the Operator to revert back to annual reporting.

2. In the first paragraph of GCC's Second Response to item #1 in the Division's second adequacy review, GCC states "As of the 2022Q2 compliance monitoring event conducted May 30-31, 2023, the mobile field form has been updated to record this additional information." The Division believes this was meant to say "As of the 2023Q2 compliance monitoring event". Whether the Division is mistaken, or if GCC concurs with the Division's assessment, please provide an email response to acknowledge this statement.



This concludes the Division's review of the responses provided to the Division's second adequacy review regarding your 2022 Annual Groundwater Report.

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

If you need additional information or have any questions, please contact me by telephone at 720-836-0967, or by email at <u>amber.michels@state.co.us</u>.

Sincerely,

Amber Michels Environmental Protection Specialist

Cc: Patrick Lennberg, DRMS Jared Ebert, DRMS Amy Veek, GCC Rio Grande, <u>aveek@gcc.com</u> Landon Beck, Resource Hydrogeologic Services, <u>lbeck@resourcehydrogeologic.com</u>