



December 12, 2023

Michael B. Toelle
Holcim (US) Inc.
3500 Highway 120
Florence, CO 81226

**Re: Portland Limestone Quarry - File No. M-1977-344;
Preliminary Adequacy Review (Part 2) for the Sampling & Analysis Plan for 112
Construction Materials Reclamation Permit Amendment Application (AM-2)**

Dear Mr. Toelle:

The Division of Reclamation, Mining and Safety (DRMS) has completed its preliminary adequacy review of Appendix 4.4, Baseline Surface and Groundwater Sampling and Analysis Plan in your 112 Construction Materials Reclamation Permit Amendment Application (AM-2) for the Portland Limestone Quarry, Permit No. M-1977-344. **The decision date for this application is January 8, 2024.** Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, **it will be your responsibility to request an extension of the review period.** If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the DRMS may deny this application.

The following items must be addressed by the applicant in order to satisfy the requirements of C.R.S. 34-32.5-101 et seq. and the Mineral Rules and Regulations of the Mined Land Reclamation Board:

- A. Reporting Frequency: The frequency of reporting quarterly sampling results is not defined. The DRMS recommends quarterly reporting to be no more than 30 days after the end of the previous quarter.
- 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

Please provide a reporting frequency.



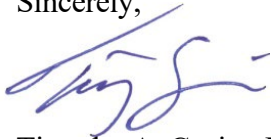
- B. Post Baseline Monitoring Schedule: The document only addresses monitoring as part of the amendment process. What is the schedule of monitoring after the 5 quarters of baseline sample collection? The Division is expecting monitoring to continue throughout the life of mine.
- C. Point(s) of Compliance: Point(s) of compliance (POC) well need(s) to be identified at the end of the five quarters of monitoring based on groundwater flow direction across the site observed during the baseline monitoring. Please commit to identifying POC well(s) via the Technical Revision (TR) process within 60 days of completing the five-quarter baseline monitoring program.
- D. Regulation 32: The specific Regulation 32 reach classification should be provided along with that reach's water quality standards table.
- E. Analyte List: The analyte list table should be broken into two tables, one for groundwater and the other for surface water. The Division understands surface water samples will be collected and analyzed for similar constituents as groundwater but there are differences between the two. Please provide separate tables for groundwater and surface water analytes to include the regulatory concentration for each analyte in each of the tables.
- F. Groundwater Analytes: The analyte list for groundwater needs additional clarification. For example, it appears the Applicant will be sampling for Thallium and Vanadium but the Regulation 41 column does not indicate they are analytes of concern.
- G. Exceedances: There is no discussion on how potential exceedances will be addressed. Please provide a narrative describing how analyte exceedances will be managed.
- H. Changes: Please acknowledge any changes to the analyte list or SAP/QAPP will be completed through the submission of a TR.
- I. QA/QC Samples: The SAP only mentions duplicate samples will be collected during sampling. However, in the QAPP Section 5.1, the third bullet indicates a more extensive list of QA/QC samples will be collected. The number and type of QA/QC samples needs to be clarified.

This adequacy letter completes the preliminary review process by the DRMS as all Exhibits and appendices in the October 3rd submittal have been reviewed. **Please remember that the decision date for this application is January 8, 2024.** As previously mentioned, if you are unable to provide satisfactory responses to any inadequacies prior to this date, it will be your responsibility to request an extension of time to allow for continued review of this application.

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If there are still unresolved issues when the decision date arrives and no extension has been requested, the application may be denied. If you have any questions, please contact me at (303) 328-5229.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Timothy A. Cazier', with a stylized flourish at the end.

Timothy A. Cazier, P.E.
Environmental Protection Specialist

cc: Michael Cunningham, DRMS
Patrick Lennberg, DRMS
DRMS file
Dr. Angela Bellantoni, EAI