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

April 3, 2024

Amy Rodrigues
GCC Rio Grande, Inc.
3372 Lime Rd
Pueblo, CO 81004

RE: Adequacy Review of 2023 Annual Hydrology Report; Permit #M-2002-004

Dear Ms. Rodrigues,

On January 30, 2024, the Division of Reclamation, Mining, and Safety (Division/DRMS) received the 2023 Annual Hydrology Report. A review of the results submitted to the Division was completed and the following issues were identified. Please review the issues outlined below and provide a response to the Division.

1. GCC Rio Grande provided figures showing pH and concentration levels of manganese, fluoride, and selenium in Figures 5 through 7 and the potentiometric groundwater elevation for each monitoring well in Figures 8 through 12. In the discussion of the groundwater levels for MW-6, MW-7, and MW-8, the permittee speculates that groundwater is recharged from both surficial precipitation and from the underlying Codell Sandstone formation. Please submit the 2023 annual precipitation data for the location to better characterize the extent of each recharge source. It is also of interest to determine if heavy precipitation events have a correlation with concentration levels of manganese, fluoride, and selenium. In future annual reports, please include precipitation data as a separate graph and incorporated with graphs of key constituents.

2. The current Groundwater Monitoring Plan does not have a point of compliance (POC). In accordance with Rule 3.1.7(6), a POC needs to be established for the Pueblo Cement and Limestone Quarry. The permittee suggests that wells MW-13 and MW-14 be considered as POC wells with additional infill level monitoring between quarterly monitoring events in 2024. Why does the permittee feel that these wells need to be infilled with seasonality data and what additional data needs to be collected to establish them as POC wells?

3. The wells MW-12 and MW-14 are similar in their chemical composition, Figure 3, and they are both screened in the Codell Sandstone formation. Fluoride concentrations in well MW-14 regularly exceed Regulation 41 Agricultural Standard of 2.0 mg/L. However, well MW-12 does not see the same exceedances of fluoride. Please provide an explanation of why there is an observed difference in fluoride concentration levels between these two wells.

4. The Operator attributes high concentrations of fluoride to "low concentrations of calcium in solution and increase in bicarbonate and carbonate alkalinity" (page 7, paragraph 2 of the annual report). Please submit graphs of the fluoride concentration against total alkalinity and bicarbonate values for wells MW-12, MW-13, and MW-14 for 2023 and in future annual reports.

This concludes the Division's review of the 2023 annual hydrology report. The Division reserves the right to further supplement this document with additional items and/or details necessary.

The due date for your response has been set for *May 3, 2024.*

If you have any questions, please contact me by email at Jocelyn.carter@state.co.us or by phone at (720) 666-1065.

Sincerely,

Jocelyn Carter
Environmental Protection Specialist
Division of Reclamation, Mining, and Safety

Ec: Jared Ebert, DRMS
Patrick Lennberg, DRMS