

April 3, 2024

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

## RE: Notice of Groundwater Discharge Exceedance Quarter 1, 2024, Pueblo Cement and Limestone, Permit# M-2002-004

Dear Ms. Rodrigues,

The Division received the notification of groundwater discharge exceedance of Agricultural Standards (Table 3) of Regulation 41 – The Basic Standards for Groundwater (Reg. 41) from the 2024 first quarter monitoring period on March 27, 2024. It is the understanding of the Division that the samples were collected on March 11 and 12, 2024 and test results were received from ACZ Laboratories on March 25 and 26, 2024. The results show that there was an exceedance of manganese (Mn) detected in wells MW-6 and MW-9, selenium (Se) was detected in well MW-7 and in the duplicate sample collected from MW-7, and fluoride detected in wells MW-13 and MW-14.

## Manganese Exceedance

The Mn exceedance detected at MW-6, 415  $\mu$ g/L, is within the historical range of Mn concentrations for this location, ranging from 100 to 1,100  $\mu$ g/L. Well MW-6, located near the center of the permit area north of mine panels and south of the plant area, has been above the standard 200  $\mu$ g/L for Mn since January 2018.

The exceedance at MW-9, 381  $\mu$ g/L, is within the historical range of Mn concentrations for this location, ranging from 410 to 780  $\mu$ g/L. Concentration of Mn have been decreasing at this location since the third quarter of 2022. Well MW-9 is located upgradient from mining activities.

Reg-41 Table 3 includes a footnote (j) for Mn, "This standard is only appropriate where irrigation water is applied to soils with pH values lower than 6.0." Groundwater at the site is not being used for irrigation purposes and therefore the standard is not appropriate for this site.

## Selenium Exceedance

The Se exceedance at well MW-7, 28.7  $\mu$ g/L, is within the historical range of Se concentrations for this location, which has ranged from non-detected to 98.1  $\mu$ g/L. The Se concentrations have been variable at this location since 2018. Well MW-7 is located approximately 25 feet west of well MW-6 on the other side of a mapped fault. The presence of Se can be attributed to the Fort Hayes Limestone formation and naturally occurring seleniferous minerals of the marine deposit, which MW-7 is screened in.



## **Fluoride Exceedance**

The exceedances of fluoride were detected in wells MW-13 and MW-14 at 6,340  $\mu$ g/L and 2,980  $\mu$ g/L, respectfully. Since the installation of both wells in April 2022, fluoride concentrations have ranged from 520 and 690  $\mu$ g/L in MW-13 and 220 and 400  $\mu$ g/L in MW-14. In the 2023 Annual Hydrology Report the Operator states that fluoride concentrations increase in groundwater where calcium concentrations are low. Recent calcium concentrations are low in both wells, MW-13 and MW-14, according to the 2023 Annual Report.

This concludes the Divisions response to the exceedance notification. The Division reserves the right to further supplement this document with additional items and/or details necessary.

The Division appreciates GCC Rio Grande's dedication to the shared mission of protecting the environment and maintaining vigilance regarding the safety of groundwaters.

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

Sincerely,

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

Ec: Jared Ebert, DRMS Patrick Lennberg, DRMS