



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

April 12, 2024

Brad Fancher
Loveland Ready-Mix Concrete, Inc.
P.O. Box 299
Loveland, CO 80539

RE: Adequacy Review No. 2; Technical Revision (TR-2) – Reduction of Sampling Frequency and Analyte List; Knox Pit, Permit No. M-2017-036

Dear Mr. Fancher,

On April 3, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's Preliminary Adequacy Review, dated February 22, 2024, for Technical Revision 2 (TR-2) at the Knox Pit, Permit No. M-2017-036. The following clarification(s) or items need to be addressed to the Division's satisfaction.

1. During review of the permit file the Division was unable to determine where the Operator had established a point(s) of compliance for the Site. Pursuant to Rule 3.1.7(6) a point or points of compliance need to be established for the Site. Please propose a point or points of compliance for the Site that meet the criteria of Rule 3.1.7(6)(b).
2. The Operator has requested a reduction of sampling frequency from quarterly to once a year. The Division will approve a reduction in sampling frequency to two times a year with one event occurring during low groundwater levels and the other during high groundwater levels. A review of water level data indicates the first and third quarters would meet this criteria. A response is required.
3. The Operator has requested a reduction in the number analytes to be tested for during monitoring. The Division believes the proposed analyte list is not sufficient enough to demonstrate that there are no unauthorized release of pollutants to groundwater occurring from any materials mined, handled or disposed of within the permit area, pursuant to Rule 3.1.5(11). The Division recommends the analyte list in Attachment 1.

This concludes the Division's Adequacy Review No. 2 of your application. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.



The decision date for your application is set for **May 2, 2024**. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

If you need additional information or have any questions, please contact me by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

Attachment 1: Proposed Analyte List for Knox Pit, M2017-036

cc: Jared Ebert, DRMS

ec: Stephanie Fancher-English, Loveland Ready-Mix Concrete, stephanief@Lrmconcrete.com
Tim Gerken, Telesto Solutions, Inc., tgerken@telesto-inc.com

Attachment 1

Appendix 1: Proposed parameter list for Knox Pit, M2017-036

Analyte	Table Value Standard (mg/L, unless other units given)	Notes
pH Field (pH unit)	6.50 - 8.50	Field Measurement
Conductivity	+/- 5%	Field Measurement
Temperature	+/- 0.5 C	Field Measurement
Bicarbonate as CaCO ₃	NA	
TDS	400 mg/L, or 1.25X background	
Chloride - Dissolved	250	
Fluoride - Dissolved	2	
Nitrite + Nitrate as Nitrogen	10	
Sulfate - Dissolved	250	
Aluminum - Dissolved	5	
Antimony - Dissolved	0.006	
Arsenic - Dissolved	0.01	
Barium - Dissolved	2	
Beryllium - Dissolved	0.004	
Boron - Dissolved	0.75	
Cadmium - Dissolved	0.005	
Chromium - Dissolved	0.1	
Cobalt - Dissolved	0.05	
Copper - Dissolved	0.2	
Iron - Dissolved	0.3	
Lead - Dissolved	0.05	
Manganese - Dissolved	0.05	
Molybdenum - Dissolved	0.21	
Nickel - Dissolved	0.1	
Selenium - Dissolved	0.02	
Silver - Dissolved	0.05	
Uranium - Dissolved	0.0168	