

June 6, 2024

Nick Michael
Union Milling Company, LLC
P.O. Box 620490
Littleton, CO 80162-0490

**Re: Adequacy Review, Proposed Water Monitoring Plan,
Leadville Mill, Permit No. M-1990-057**

Dear Mr. Michael:

On June 4, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your partial response to the Division's Groundwater and Surface Water Specific Adequacy Review (April 11, 2024) for the Leadville Mill, Permit No. M-1990-057. The following clarifications or items need to be addressed to the Division's satisfaction.

1. The submitted materials appear to address items #9, #10, and #11 of the Division's letter dated April 11, 2024. Please provide a clear statement indicating what items are being addressed with this submission.
2. The analyte Table 2-2 should be revised to be consistent with Appendix B - Full parameter List for Hard Rock Sites (with Table Value Standards) from Regulation 41 from the Groundwater Monitoring: Sampling and Analysis Plan Guidance Construction Materials and Hard Rock Sites (September 2023). A copy of the Appendix B has been provided as an attachment to this letter. Please note field pH measurements are sufficient.
3. Please note the Division only requires analysis for Total portion for some analytes while the majority of analytes are the Dissolved portion. If the Operator wants to sample for the Total portion in addition to the Dissolved portion that is at their own discretion.
4. Tables 2-2 and 2-3 contain analytes the Division does not require. Specifically, chlorophenol, phenol, asbestos, color, corrosivity, foaming agents, odor and total coliforms. If the Operator wants to sample for these analytes it is at their own discretion.
5. In Section 2.1.3 - Sample Procedures, please clarify what is in Appendix B3 and which Regulations are being referenced.



6. Please update Section 4 – Water Monitoring Reporting to include a commitment to providing the Division a written report within five (5) working days when there is evidence of groundwater analytes exceeding applicable groundwater standards or permit conditions imposed to protect groundwater quality, in accordance with Rule 3.1.7(9). Please be advised, this notice requirement would apply to any exceedance of the groundwater monitoring standards set for monitoring wells. However, enforcement actions would only be pursued for exceedances at the approved point of compliance well.

Please respond to these adequacy items prior to your decision date. The decision date for your application is set for **February 7, 2025**.

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: Appendix B: Full parameter list for Hard Rock Sites

cc: Lucas West, DRMS
Todd Jesse, DRMS
Jared Ebert; DRMS

ec: Nick Michael, Union Milling Company, LLC, nmichael@unionmilling.com
Gary Knippa, Union Milling Company, LLC, gknippa@msn.com

Attachments

Appendix B: Full parameter list for Hard Rock Sites (with Table Value Standards) from Regulation 41, Tables 1-4

Analyte	Table Value Standard (mg/L, unless other units given)	Reg. 41 Table Reference (1-4)
pH Field (pH unit)	6.50 - 8.50	2 and 3
TDS	400 mg/L, or 1.25X background	4
Chloride - Dissolved	250	2
Fluoride - Dissolved	2	3
Nitrate (NO ₃)	10	1
Nitrite (NO ₂)	1.0	1
Nitrite + Nitrate as Nitrogen	10	1
Sulfate - Dissolved	250	2
Aluminum - Dissolved	5	3
Antimony - Dissolved	0.006	1
Arsenic - Dissolved	0.01	1
Barium - Dissolved	2	1
Beryllium - Dissolved	0.004	1
Boron - Dissolved	0.75	3
Cadmium - Dissolved	0.005	1
Chromium - Dissolved	0.1	1 and 3
Cobalt - Dissolved	0.05	3
Copper - Dissolved	0.2	3
Iron - Dissolved	0.3	2
Lead - Dissolved	0.05	1
Lithium - Dissolved	2.5	3
Manganese - Dissolved	0.05	2
Mercury - Dissolved	0.002	1
Molybdenum - Dissolved	0.21	1
Nickel - Dissolved	0.1	1
Selenium - Dissolved	0.02	3
Silver - Dissolved	0.05	1
Thallium - Dissolved	0.002	1
Uranium - Dissolved	0.0168 to 0.03	1
Vanadium - Dissolved	0.1	3
Zinc - Dissolved	2	3
Cyanide - Free	0.2	1
Beta and Photon emitters	4 mrem/yr	1
Gross Alpha	15 pCi/L	1

- These analytes, at a minimum, will be tested for during the five (5) quarters of baseline monitoring. It will be up to the Operator/Permittee to submit a Technical Revision with proper justification to reduce the analyte list.