



COLORADO DIVISION
1313 Sherman Street

TR06

DIVISION, MINING AND SAFETY
80203 ph(303) 866-3567

PSH/jle

RECEIVED

REQUEST FOR TECHNICAL REVISION (TR) COVER SHEET

JUN 26 2020

File No.: M- **1989-120**

Site Name: **Platte Valley Operation**

County **Weld**

TR#

DIVISION OF RECLAMATION
MINING & SAFETY
(DRMS Use only)

Permittee: **Aggregate Industries - WCR, Inc.**

Operator (If Other than Permittee):

Permittee Representative: **Jeremy Pritchett**

Please provide a brief description of the proposed revision:

Removal of the monitoring requirements and the annual monitoring report for the three Broda groundwater

wells based on CDPHE's determination that Broda's inert backfill operations meet the approved criteria (see attached).

As defined by the Minerals Rules, a Technical Revision (TR) is: "a change in the permit or application which does not have more than a minor effect upon the approved or proposed Reclamation or Environmental Protection Plan." The Division is charged with determining if the revision as submitted meets this definition. If the Division determines that the proposed revision is beyond the scope of a TR, the Division may require the submittal of a permit amendment to make the required or desired changes to the permit.

The request for a TR is not considered "filed for review" until the appropriate fee is received by the Division (as listed below by permit type). Please submit the appropriate fee with your request to expedite the review process. After the TR is submitted with the appropriate fee, the Division will determine if it is approvable within 30 days. If the Division requires additional information to approve a TR, you will be notified of specific deficiencies that will need to be addressed. If at the end of the 30 day review period there are still outstanding deficiencies, the Division must deny the TR unless the permittee requests additional time, in writing, to provide the required information.

There is no pre-defined format for the submittal of a TR; however, it is up to the permittee to provide sufficient information to the Division to approve the TR request, including updated mining and reclamation plan maps that accurately depict the changes proposed in the requested TR.

Required Fees for Technical Revision by Permit Type - Please mark the correct fee and submit it with your request for a Technical Revision.

<u>Permit Type</u>	<u>Required TR Fee</u>	<u>Submitted</u> (mark only one)
110c, 111, 112 construction materials, and 112 quarries	\$216	<input checked="" type="checkbox"/>
112 hard rock (not DMO)	\$175	<input type="checkbox"/>
110d, 112d(1, 2 or 3)	\$1006	<input type="checkbox"/>

COMPLIED!!!
10 MINOR INFRACTIONS
NO VIOLATIONS
PSH/jle



COLORADO
Department of Public
Health & Environment

Andre Laroche
Environmental and Land Manager
Aggregate Industries/Transit Mix Concrete Co.
1687 Cole Blvd., Suite 300
Golden, CO 80401

January 10, 2020

RE: Follow-up to the HMWMD's October 2, 2017 letter

SW-WLD-PVP 1.1

Mr. Laroche,

On October 2, 2017, the Hazardous Materials and Waste Management Division ("the division") issued a letter to Mr. Harrison Broda informing him that his inert landfill operation located at 1859 North HWY 85 in Brighton, CO may no longer be subject to the division's regulatory authority if certain operational criteria were met. Mr. Broda operates the inert fill under an agreement with Aggregate Industries.

On December 2, 2019, the division received an email from the Colorado Division of Natural Resources' Division of Reclamation and Mining Safety ("DRMS") inquiring if Mr. Broda has supplied a copy of the DRMS approved reclamation permit as required by the division's October 2, 2017 letter.

On December 16, 2019, DRMS emailed the reclamation plan, and supporting documents to the division. Based on the division's email communications with DRMS and the division's review of the Platte Valley Pit reclamation plan, the division has determined that Broda's inert backfill operations meet the criteria identified in second paragraph, on page 3 of the division's July 2017 Memorandum of Understanding with DRMS concerning solid waste issues. Paragraph 2, on page 3 states:

"Where the facility is complying with MLRB Permit pre-screening requirements (Rule 3.1.5(9)), inert material may be used as fill during mining without further HMWMD approval in accordance with the pre-approved beneficial use table referenced in the Solid Waste Regulations, 6 C.C.R. 1007-2, Part 1, § 8.6.1(A)(4)(Table 3)."



This determination is based on Broda's/Aggregate Industries ongoing compliance with the approved DRMS reclamation permit. Broda and Aggregate Industries may only import uncontaminated soil, asphalt and concrete that are all free of asbestos.

Please contact me at 303-692-3425, or david.snapp@state.co.us if you have any questions regarding this determination.

Sincerely,



David Snapp, Manager
Solid Waste and Materials Management Program
Hazardous Materials and Waste Management Division

ec: Peter Hays, Colorado Division of Natural Resources
Harrison Broda, Broda Inert Fill
Mark Molen, Molen and Associates
Ben Frissell, Weld County



June 22, 2020

Mr. Peter S. Hays
Division of Reclamation Mining Safety
1313 Sherman Street Room 215
Denver CO 80203



Re: Permit No M 1989 120 Platte Valley
Technical Revision Request

Dear Mr. Hays:

Aggregate Industries (Aggregate) submits the enclosed Request for Technical Revision (TR) Form and the January 10, 2020 letter from CDPHE Hazardous Materials and Waste Management Division ("the division") regarding the criteria of the inert landfill operation located at 1859 North HWY 85 in Brighton, Colorado. Mr. Harrison Broda operates the inert landfill under an agreement with Aggregate. CDPHE has stated that groundwater monitoring would not be required as long as the backfilling operation was in compliance with Division of Reclamation, Mining, and Safety (DRMS) requirements. Upon review of the DRMS reclamation plan, the division has determined that Mr. Broda's inert backfill operations meet the criteria specified on Page 3 of the division's 2017 Memorandum of Understanding with DRMS regarding solid waste. Aggregate respectfully requests removing the groundwater monitoring and reporting requirements as a result of this determination and the fact that Aggregate and Broda only import uncontaminated material as required by the DRMS reclamation permit.

Also enclosed is the check in the amount of \$216.00 for the technical revision fee.

Please contact me at 970-396-5252 or jeremy.pritchett@lafargeholcim.com if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Pritchett".

Jeremy Pritchett
Environmental and Land Manager

Enclosures

Aggregate Industries
West Central Region, Inc.
1687 Cole Boulevard, Suite 300
Golden, CO 80401

Telephone: 303-985-1070

An Equal Opportunity Employer



Aggregate Industries Mgmt Inc.
6211 N ANN ARBOR RD
DUNDEE, MI, 48131

JPMorgan Chase Bank, N.A.
Syracuse, NY, NY, USA

CHECK # ~~4000205042~~
501

Permit # M1989120
Receipt # 3669

DATE 06-18-2020
MM DD YYYY
50-937/213

TWO HUNDRED SIXTEEN DOLLARS AND ZERO CENTS

\$ **216.00

PAY TO THE ORDER OF
DIV OF RECLAMATION MINING & SAFETY
1313 SHERMAN ST ROOM 215
DENVER CO 80203

A handwritten signature in black ink, appearing to be 'JH.', written above a horizontal line.



1765184

Division of Reclamation, Mining, and Safety

Fee Receipt for M1989120

Aggregate Industries - WCR, Inc.

Chance Allen

1687 Cole Blvd

Suite 300

Golden

CO 804010000

Receipt #: 31669

Date: 06/29/2020

Permit: M1989120

Payment Method	Revenue Code	Fee Description/Notes	Amount
Check #4000205042	4300-MTR0	Minerals Technical Revision User: sdt Payer: Aggregate Industries Mgmt Inc. TR06	\$216.00

Receipt Total: \$216.00

J. PRITCHETT

AGGREGATE INDUSTRIES - WCR, INC.
687 COLE BLVD., SUITE 300
GOLDEN, CO 80401



7019 1640 0000 8368 2724

10 MAIL



1023



80203

U.S. POSTAGE PAID
FCM LG ENV
GOLDEN, CO
80401
JUN 24, 20
AMOUNT
\$7.60
R2304E105542-15

RECEIVED

JUN 26 2020

DIVISION OF RECLAMATION
MINING & SAFETY

MR. PETER S. HAYES
DIVISION OF RECLAMATION, MINING, & SAFETY
1313 SHERMAN ST. ROOM 215
DENVER, CO 80203