



COLORADO

Division of Reclamation,
Mining and Safety


Department of Natural Resources

MINERALS PROGRAM INSPECTION REPORT

PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Alamosa Pit No. 2	MINE/PROSPECTING ID#: M-1983-175	MINERAL: Sand and gravel	COUNTY: Alamosa
INSPECTION TYPE: Monitoring	WEATHER: Windy	INSP. DATE: September 5, 2024	INSP. TIME: 13:20
OPERATOR: Southwest Ready-Mix, Inc.	OPERATOR REPRESENTATIVE: Paul Bottini	TYPE OF OPERATION: 112c - Construction Regular Operation	

REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: Complete Bond	BOND AMOUNT: \$746,167.40
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None
INSPECTOR(S): Chris Girardi Jared Ebert	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: October 8, 2024

The following inspection topics were identified as having Problems or Possible Violations. OPERATORS SHOULD READ THE FOLLOWING PAGES CAREFULLY IN ORDER TO ASSURE COMPLIANCE WITH THE TERMS OF THE PERMIT AND APPLICABLE RULES AND REGULATIONS. If a Possible Violation is indicated, you will be notified under separate cover as to when the Mined Land Reclamation Board will consider possible enforcement action.

INSPECTION TOPIC: Backfilling & Grading, Mine Plan, and Hydrologic Balance

POSSIBLE VIOLATION: The Division Staff observed rebar, other metal material, a metal drum, wood, plastic and debris scattered throughout the site and found to be backfilled within the exposed groundwater pit excavation (see Photos 9-15). This is a possible violation of the following: C.R.S. 34-32.5-116(4)(d) for failure to prevent the release of pollutants to the groundwater from any materials handled, or disposed of within the permit area; C.R.S. 34-32.5-116(4)(e) for failure to dispose of refuse in a manner that controls unsightliness or deleterious effects of such refuse; C.R.S. 34-32.5-116(4)(h) for failure to minimize the disturbance to the hydrologic balance; and C.R.S. 34-32.5-124 and Rule 3.1.5(9) for failure to comply with the conditions of the permit to backfill the pits with inert material in accordance with the approved reclamation plan.

CORRECTIVE ACTIONS: This possible violation will require a hearing before the Mined Land Reclamation Board (MLRB). The schedule and other details for the MLRB hearing will be provided under a separate document to be sent via certified mail to the Operator.

CORRECTIVE ACTION DUE DATE: Tentative MLRB Hearing – November 13 & 14, 2024

INSPECTION TOPIC: Topsoil

POSSIBLE VIOLATION: The Division Staff did not observe topsoil stockpiles at the site. This is a possible violation of the following: of C.R.S. 34-32.5-116(4)(g) for failure to remove topsoil and segregate from other spoil and C.R.S. 34-32.5-124 for failure to comply with the conditions of the permit to stockpile topsoil for reclamation in

accordance with the approved reclamation plan.

CORRECTIVE ACTIONS: This possible violation will require a hearing before the Mined Land Reclamation Board (MLRB). The schedule and other details for the MLRB hearing will be provided under a separate document to be sent via certified mail to the Operator.

CORRECTIVE ACTION DUE DATE: Tentative MLRB Hearing – November 13 & 14, 2024

INSPECTION TOPIC: Revegetation

PROBLEM: A significant infestation of several noxious weeds is occurring at the site. List B noxious weed species observed were Tamarisk, Knapweed, Salt cedar, Canada thistle, and Russian olive. This is a problem at this time for failure to employ weed control for all prohibited noxious weeds in accordance with Rule 3.1.10(6).

CORRECTIVE ACTIONS: The Operator shall develop a Weed Control Plan and submit this plan as well as a timeline for its implementation as a Technical Revision to the permit. The technical revision will be submitted to the Division by the corrective action due date noted below.

CORRECTIVE ACTION DUE DATE: November 8, 2024

OBSERVATIONS

The Alamosa Pit No.2 was inspected by Chris Girardi and Jared Ebert with the Division of Reclamation, Mining, and Safety (DRMS) as part of the DRMS's routine monitoring inspection program. The site was last inspected on October 5, 2016, as part of a routine monitoring inspection. Paul Bottini represented Southwest Ready Mix (Operator) during the inspection. The weather was sunny and windy.

The Alamosa Pit No.2 is a 112c sand and gravel operation that consists of 40 acres and is located approximately 4.5 miles northeast of Alamosa, CO. The approved post-mining land use is wildlife habitat. The current land uses surrounding the site are industrial and rangeland.

A mine identification sign was located at the entrance to the site in compliance with Rule 3.1.12. The site is accessed from the eastern side using a gate. The permit boundary is enclosed with a fence.

General Compliance with Mining Plan:

According to the Operator, mining hasn't been conducted in over 20 years. The eastern third of the site consists of a backfilled pit with rough, undulating topography and minor amounts of vegetation. The remaining portion of the site consist of several open pits containing groundwater with the surrounding area consisting of coarse-grained and structural fill material backfilled in the former pits. Thick vegetation has established in patches throughout the site consisting of a significant amount of noxious weeds. The south-central portion of the site is currently being used as a processing area for fine-grained material. The equipment onsite included portable conveyers, a grizzly screener, and two track-mounted dozers. During the time of inspection, the Operator was processing material that appears to be brought in from off-site. The site also contained a trailer with oil tanks and empty blue drums that previously contained water for processing. Several stockpiles of fine-grained material were observed in the western portion of the site. A large stockpile of tires was observed in the southwest corner of the site (see Photo 14).

The approved mining plan stated that approximately six (6) to nine (9) inches of topsoil was to be stockpiled along the perimeter of the site. During this inspection, the DRMS did not observe topsoil stockpiles along the perimeter or any other location at the site. Based on this observation, this is a possible violation of C.R.S. 34-32.5-116(4)(g) for failure to remove topsoil and segregate from other spoil and C.R.S. 34-32.5-124 for failure to comply with the conditions of the permit to stockpile topsoil for reclamation in accordance with the approved reclamation plan.

The Operator is approved to import inert backfill material from the King Pit for use as backfill. During this inspection, the DRMS observed rebar, other metal material, a metal drum, wood, plastic and debris scattered throughout the site (see Photos 2-5). This material appears to be mixed in with structural fill material that is used to backfill the open groundwater pit excavations at the site. Based on these observations, this is a possible violation of the following: C.R.S. 34-32.5-116(4)(d) for failure to prevent the release of pollutants to the groundwater from any materials handled, or disposed of within the permit area; C.R.S. 34-32.5-116(4)(e) for failure to dispose of refuse in a manner that controls unsightliness or deleterious effects of such refuse; C.R.S. 34-32.5-116(4)(h) for failure to minimize the disturbance to the hydrologic balance; and C.R.S. 34-32.5-124 and Rule 3.1.5(9) for failure to comply with the conditions of a permit to backfill the pits with inert material in accordance with the approved reclamation plan. Rebar is a solid waste material that is corrosive if exposed to weathering, and wood is putrescible. Trash was also observed in several areas. The Operator

stated they did not, to his knowledge, have a Certificate of Designation from the County or approval from the Colorado Department of Public Health and the Environment to legally dispose of solid waste and/or non-inert material on-site.

The site contains several ponds with exposed groundwater. The DRMS observed a drum within one of the reclamation ponds (see Photo 7). Heavy corrosion and oxidation of the drum was observed. Due to the corrosive nature of the drums, rebar and metal material, as well as the other debris mixed in with the backfilled material and the contact with groundwater, negative impacts to the groundwater system are likely.

A significant noxious weed infestation has occurred at the site. Noxious weed species observed were Tamarisk, Knapweed, Salt cedar, Canada thistle, and Russian olive (see Photos 9-12). These species were observed throughout the site, often in thick patches. In accordance with Rule 3.1.10(6) of the Construction Materials Rules and Regulations governing weed control, the DRMS will require the Operator to develop a weed control plan to be employed to control the current infestation and prevent the spread of weeds to the surrounding area.

The Division currently holds a reclamation bond in the amount of \$746,167.40 for this operation. The Division has estimated the reclamation liability at the site, based on what is currently disturbed and the cost to remove and dispose of the un-approved waste backfilled into the open groundwater pit. This liability is found to be \$1,936,147.00. A copy of the reclamation cost estimate is enclosed. This is an increase of \$1,189,979.60 from the bond currently held. The Operator will have 14 days (October 22, 2024), from the issuance of this report to submit any questions regarding the updated cost estimate. If no questions are received, the Division may issue a Surety Increase notice for the difference. The Operator will have 60 days from the date of the notice to submit and obtain acceptance of the increase in financial warranty from the Division in accordance with Rule 4.2.1(2)

This concludes the DRMS's inspection report; a subset of photographs was taken during the time of the inspection are included below. If you need additional information or have any questions, please contact me at the Division of Reclamation, Mining, and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at 720-793-3041 or by email at chris.girardi@state.co.us.

PHOTOGRAPHS



Photo 1: Processing stockpile and conveyer in the middle of the site.



Photo 2: Pond at western portion of site with backfill material along shoreline containing, piping, rebar and concrete.



Photo 3: Backfill material containing rebar in eastern portion of site.



Photo 4: A concrete pile containing rebar and metal in the eastern portion of site.



Photo 5: Reclaimed area with backfill containing wood in eastern portion of site.



Photo 6: Reclamation pond in western portion of site.



Photo 7: Pond in northern central portion of site containing a partially submerged metal drum.



Photo 8: Pond with shoreline containing trash and debris in western portion of site.



Photo 9: Tamarisk weed along pond shoreline in eastern portion of site.



Photo 10: Facing south at Knapweed in western portion of site.



Photo 11: Facing west at Russian olive tree in reclaimed area in eastern portion of site.



Photo 12: Facing north at Halogeton weed in western portion of site.



Photo 13: Facing north at trailer, oil tanks within trailer, empty drums, and conveyer.



Photo 14: Facing west at stockpile of tires in southwestern portion of site.



Photo 15: Facing north at grizzly screener and portable conveyers.



Photo 16: Facing north at track mounted bulldozers

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

(AR) RECORDS----- <u>N</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>N</u>
(HB) HYDROLOGIC BALANCE----- <u>PV</u>	(BG) BACKFILL & GRADING----- <u>PV</u>	(EX) EXPLOSIVES----- <u>NA</u>
(PW) PROCESSING WASTE/TAILING---- <u>Y</u>	(SF) PROCESSING FACILITIES----- <u>N</u>	(TS) TOPSOIL----- <u>PV</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>PV</u>	(FW) FISH & WILDLIFE----- <u>Y</u>	(RV) REVEGETATION---- <u>PB</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SP) STORM WATER MGT PLAN---- <u>N</u>	(RS) RECL PLAN/COMP-- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>Y</u>	(SC) EROSION/SEDIMENTATION--- <u>N</u>	(ST) STIPULATIONS----- <u>N</u>
(AT) ACID OR TOXIC MATERIALS----- <u>NA</u>	(OD) OFF-SITE DAMAGE----- <u>N</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited


Inspection Contact Address

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Southwest Ready-Mix, Inc.
117 White Pine Dr.
Alamosa, CO 81101

Enclosure: CIRCES Reclamation Cost Estimate – October 8, 2024

CC: Jared Ebert, DRMS

Legend:

 Inspection Photo Location

13 Photo Number



Map: This map was generated in Google Earth to display locations where photos were taken during the Alamosa Pit No. 2 inspection conducted September 5, 2024.