

October 11, 2024

Mr. Dan Geoffroy
Plant Manager
Allegion/Schlage Lock Company LLC
3899 Hancock Expressway
Security Colorado, 80911

RE: Modification Request to the Bradley Road Groundwater Recovery; Schlage Lock Company, 3899 Hancock Expressway, Security Colorado; EPA ID No. COD082657420; Compliance Order on Consent 90-06-01-01 as amended

Dear Mr. Geoffroy:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Division) has reviewed the Modification Request to the Bradley Road Groundwater Recovery, dated October 7, 2024, (2024 Bradley Road GWR Mod Request) for the above-reference site. The purpose of the 2024 Bradley Road GWR Mod Request is to present rationale and details for abandoning the western line of injection wells and monitoring wells associated with the Bradley Road pump and treat system to provide mining access for the property owner, Holcim Group (Holcim). The objectives of the 2024 Bradley Road GWR Mod Request were prepared in accordance with the Department's 1990 Compliance Order on Consent No. 90-06-01-01 as amended (the Order).

The Bradley Road Area is located at 4080 Bradley Road, Security, Colorado, approximately 0.5 miles downgradient of the Schlage facility, and is located on the Daniel Sands quarry property, owned by Holcim. The pump and treat system operated under an access agreement between Schlage and Transit Mix Concrete Company (predecessor to Holcim). The system operated from 1999 to August 2018. Following system shut-down Schlage Lock Company has been implementing a full-scale in-situ bio remediation (ISBR) interim remedial measure, which is on-going. The pump and treat system equipment has been left in place to date in the event that re-activation is required and to satisfy the requirements of the Order.

The 2024 Bradley Road GWR Mod Requests the following:

- Abandon 10 injection wells (INJ-A, -B, -C, -D, -E, -G, -I, -F, and -JR);
- Abandon 3 monitoring wells (SW-27, SW-28A, and SW-28B); and
- Abandon and remove a conveyance pipeline from the groundwater treatment facility to the injection wells listed above.

The Division approves the 2024 Bradley Road GWR Mod Request as submitted with the following comments:

1. The abandonment of the 10 injection wells and conveyance pipe will not impact the ability to restart the pump and treat system if it is determined to be necessary as four

injection wells will remain in the eastern area. The ability to restart the pump and treat system maintains the site's ability to comply with requirements laid out in the Order.

2. The abandonment of three monitoring wells is supported by SW-27 being measured for water level only, SW-28A is monitored for natural attenuation and has been below the Colorado Basic Quality Standard (CBGQS) of 5 ug/L since May 2000, and SW-28B was approved for its removal from routine monitoring in 2016. The Division does not believe the abandonment of the three wells will impact groundwater monitoring due to their limited data results.
3. It is the Division's understanding that Holcim's mining permit prohibits them impacting groundwater and restricts their activities to beyond 5 feet (ft) from the water table. In the unlikely event that Holcim encounters groundwater, the Division urges them to notify Geosyntec, Schlage, and the Division due to the potential of it being a hazardous waste. Please provide Holcim a copy of this correspondence and draw their attention to this item.
4. The Division reserves the right to require the installation of additional monitoring or injection wells to replace the wells that will be abandoned.
5. All wells must be abandoned/plugged in accordance with the requirements of the Office of State Engineer, as set forth in 2 CCR 402-2, Rule 16.

If you have any questions regarding the requirements of this letter, please contact me at 720-213-8518.

Sincerely,

Robert Adams

Robert Adams
Hazardous Waste Corrective Action Unit
Hazardous Waste Program

ec: Russell E. Eiler - Allegion
Melissa Asher, Dustin Jensen, Jake Crum - Geosyntec
Richard Mruz, Jr. - CDPHE, HMWMD

