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NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail – Return Receipt Requested

April 9, 2015

Mr. Saul Alvidrez, Plant Manager
GCC Rio Grande, Inc., Tijeras Plant
P.O. Box 100
Tijeras, NM 87059

Re: GCC Rio Grande, Inc.; Tijeras Plant; Minor; SIC 3241; NPDES Compliance Evaluation Inspection; NM0000116; March 18 & 19, 2015

Dear Mr. Alvidrez:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the “Further Explanations” section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

GCC Rio Grande, Inc. / Tijeras Plant
April 9, 2015
Page 2 of 2

Sincerely,

/s/Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) e-mail
Brent Larsen & Tung Nguyen, USEPA (6WQ-PP) by e-mail
Isaac Chen, USEPA (6WQ-PP) by e-mail
Bill Chavez, NMED District I by e-mail



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES										yr/mo/day					Inspec. Type	Inspector	Fac Type										
1	N	2	5	3	N	M	0	0	0	0	1	1	6	11	12	1	5	0	3	1	8	17	18	C	19	S	20	2
Remarks																												
C E M E N T M A N U F A C T U R I N G & Q U A R R Y																												
Inspection Work Days						Facility Evaluation Rating						BI	QA	-----Reserved-----														
67						70						71	72	74 75										80				

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) GCC Rio Grande, Inc., Tijeras Plant, 11783 State Highway 337 South, Tijeras, NM, 87059. From NM 14 and I-25, South on NM 337, approximately 1/4 mile, Entrance on Right. Bernalillo County.		Entry Time /Date ~0920 hours / 3/18/2015 ~0920 hours / 3/19/2015	Permit Effective Date December 1, 2010
		Exit Time/Date ~ 1555 hours / 3/18/2015 ~ 1125 hours / 3/19/2015	Permit Expiration Date November 30, 2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) -Saul Alvidrez, Plant Manager, GCC Rio Grande, Inc. (see below) -Sarah Vance, Environmental, GCC Rio Grande, Inc. -Vern Hershberger, Senior Consultant, Trinity Consultants, Albuquerque, NM / 505-266-6611 -Filiberto Gomez, Division Geologist, GCC Rio Grande, Inc. -Ed Mummey, Quarry Manager, GCC Rio Grande, Inc. -Randy Rose, Lab Technician, GCC Rio Grande, Inc. -Doug Roark, Vice President, Energy & Environment, GCC America, 600 S Cherry St, Glendale, CO 80246, 303-739-5910		Other Facility Data Monitoring Location Outfall 001 Latitude: 35.073611° Longitude: -106.397500° Permitted Outfall 004 Latitude: 35.072222° Longitude: -106.384444° SIC 3241 Cement, Hydraulic (Primary)	
Name, Address of Responsible Official/Title/Phone and Fax Number Saul Alvidrez, Plant Manager, Tijeras Plant, GCC Rio Grande, Inc., P.O. Box 100, Tijeras, NM 87059 / 505-286-6038, 505-281-3311 and fax 505-281-9126		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	M	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
U	Effluent/Receiving Waters	U	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. See attached report and further explanations.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/Erin S. Trujillo	Agency/Office/Telephone/Fax NMED/SWQB/505-827-0418	Date 04/09/2015
Signature of Management QA Reviewer Sarah Holcomb /s/Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 04/09/2015

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED Yes)DETAILS: **Outfall 004 not constructed. Latitude and longitude location incorrect in permit.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE. Y N NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES. Y N NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT. **Outfall 001 (Yes), Outfall 004 (No)** Y N NA
4. ALL DISCHARGES ARE PERMITTED. Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. S M U NA (FURTHER EXPLANATION ATTACHED Yes)DETAILS: **NetDMR status - no subscriber agreement as of the date of this CEI. Since the effective date of this permit, discharge from Outfall 001 reported in August 2014. See further explanation of flow measurement record retention.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **pH results invalid (exceeded holding time)** Y N NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. **pH** S M U NA
- a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING. **pH location** Y N NA
- b) NAME OF INDIVIDUAL PERFORMING SAMPLING. **pH** Y N NA
- c) ANALYTICAL METHODS AND TECHNIQUES. **pH method (No), technique (Yes)** Y N NA
- d) RESULTS OF ANALYSES AND CALIBRATIONS. **pH calibration not documented / not provided** Y N NA
- e) DATES AND TIMES OF ANALYSES. **pH** Y N NA
- f) NAME OF PERSON(S) PERFORMING ANALYSES. **pH** Y N NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. **pH** S M U NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. S M U NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. S M U NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED. S M U NA
2. TREATMENT UNITS PROPERLY MAINTAINED. S M U NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. S M U NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. S M U NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE. S M U NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. S M U NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. **Sample collection containers, pH instrument buffers** S M U NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NA
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **Monitoring/Measurements** Y N NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? Y N NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? Y N NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? Y N NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? Y N NA
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? Y N NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED Yes).
 DETAILS: **Since the effective date of this permit, discharge from Outfall 001 reported in August 2014.**

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. Y N NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. Y N NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. Y N NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. **WET** Y N NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. **WET** Y N NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE. Y N NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. Y N NA

b) PROPER PRESERVATION TECHNIQUES USED. Y N NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. **pH holding time** Y N NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? Y N NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED Yes)
 DETAILS: **Part I.A of the permit requires "estimate." Calculation records not retained / not provided.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE Y N NA

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N NA

4. CALIBRATION FREQUENCY ADEQUATE. Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. Y N NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Y N NA

6. HEAD MEASURED AT PROPER LOCATION. Y N NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. Y N NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED Yes)
 DETAILS: **Contract laboratory not inspected. No documentation that bio-monitoring samples shipped to WET contract lab.**

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES). **pH, dissolved metal filtration** Y N NA

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. **Not documented** Y N NA
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. **pH** S M U NA
4. QUALITY CONTROL PROCEDURES ADEQUATE. **See further explanations** S M U NA
5. DUPLICATE SAMPLES ARE ANALYZED. **0** % OF THE TIME. **See further explanations** Y N NA
6. SPIKED SAMPLES ARE ANALYZED. **100% (field) use of pH buffers / 100% (laboratory)** % OF THE TIME. Y N NA
7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME **Hall Environmental Analysis Laboratory**LAB ADDRESS **4901 Hawkins NE, Albuquerque, NM 87109, 505-345-3975**PARAMETERS PERFORMED **Metals, Hardness, pH, Total Dissolved Solids, Total Suspended Solids (TSS)**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED **Yes**).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No discharge	NA					
004	Not constructed	NA					

RECEIVING WATER OBSERVATIONS **No discharge on day of this CEI. See further explanations for Aug 2014 discharge & reported exceedances.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED **No**).

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U NA
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED **No**).

1. SAMPLES OBTAINED THIS INSPECTION. Y N NA
2. TYPE OF SAMPLE OBTAINED
GRAB _____ COMPOSITE SAMPLE _____ METHOD _____ FREQUENCY _____
3. SAMPLES PRESERVED. Y N NA
4. FLOW PROPORTIONED SAMPLES OBTAINED. Y N NA
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. Y N NA
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. Y N NA
7. SAMPLE SPLIT WITH PERMITTEE. Y N NA
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. Y N NA
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. Y N NA

**GCC Rio Grande, Inc. - Tijeras Plant
Compliance Evaluation Inspection
NPDES Permit No. NM0000116
March 18 and 19, 2015**

Further Explanations

Introduction

On March 18 and 19, 2015, a Compliance Evaluation Inspection (CEI) was conducted by Erin S. Trujillo, of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) at the GCC Rio Grande, Inc., Tijeras Plant located at 11783 State Highway 337, Tijeras, New Mexico in Bernalillo County. On March 18, 2015, Ms. Trujillo was accompanied by Daniel Valenta, also of NMED SWQB. GCC Rio Grande, Inc. is classified as a minor facility discharger under the federal Clean Water Act, Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned permit No. NM0000116.

Figures 1, 2 and 3 are site location maps showing topography, plant location and flood zone areas. Outfall 001 discharges to unclassified Corral Canyon subject to 20.6.4.98 *State of New Mexico Standards for Interstate and Intrastate Surface Waters 20.6.4 New Mexico Administrative Code* (NMAC), thence to unclassified Tijeras Arroyo subject to 20.6.4.99 NMAC, thence to a classified reach of the Rio Grande in Segment 20.6.4.105 of the Rio Grande Basin. The location identified in the NPDES Permit for Outfall 004 is on the east side of the Tijeras Plant facility. Stormwater discharges to the east, including the main entrance, would be to unclassified Cedro Canyon subject to 20.6.4.98 NMAC, thence to Tijeras Arroyo, thence to the Rio Grande. Unclassified waters subject to 20.6.4.98 NMAC have designated uses of livestock watering, wildlife habitat, marginal warmwater aquatic life and primary contact. State of New Mexico, CWA §303(d)/§305(b) Integrated List, lists Tijeras Arroyo (Assessment Unit NM-9000.A_001), from Four Hills Bridge to headwaters, often referred to as Tijeras Creek or Tijeras Canyon, as not supporting warmwater aquatic life. Listed impairment causes include nutrient, eutrophication, and benthic macro-invertebrate community.

Upon arrival at approximately 0920 hours on March 18, 2015, Ms. Trujillo made introductions, presented credentials to Saul Alvidrez, Plant Manager, GCC Rio Grande, Inc. and conducted an entrance interview to discuss the purpose of the inspection with Mr. Alvidrez; staff of the GCC Rio Grande, Inc. Tijeras Plant, including Sarah Vance, Environmental Specialist and Ed Mummey, Quarry Manager; and Vern Hershberger, Senior Consultant, Trinity Consultants, Albuquerque, New Mexico. Additional information was obtained from Filiberto Gomez, Division Geologist and Randy Rose, Lab Technician, GCC Rio Grande, Inc. Tijeras Plant during the CEI. The inspectors (Ms. Trujillo and Mr. Valenta), Mr. Alvidrez, Ms. Vance and Mr. Mummey toured portions of the facility on March 18, 2015. The inspectors left the facility at approximately 1555 hours on March 18, 2015. Ms. Trujillo returned to the facility on March 19, 2015 at approximately 0920 hours to conduct an exit interview on site to discuss preliminary findings with Mr. Alvidrez, Ms. Vance, Mr. Hershberger, and Doug Roark, Vice President, Energy & Environment, GCC America, Glendale, Colorado. Following the exit interview, Ms. Trujillo left the facility at approximately 1125 hours on March 19, 2015.

NMED performs a certain number of CEI's for U.S. Environmental Protection Agency (USEPA) each year. The purpose of this inspection is to provide USEPA with information to evaluate the permittee's compliance with the NPDES permit. This report is based on review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and verbal information provided by the permittee's representatives. GCC Rio Grande, Inc. is also authorized to discharge under the NPDES Storm Water Multi-Sector General Permit (MSGP) for Industrial Activities and is assigned permit tracking number NMR05GD23 under the expired 2008 MSGP. This report addresses compliance with the individual permit only and does not address compliance with the MSGP.

Facility Description and Treatment Scheme

GCC (Grupo Cementos de Chihuahua) Rio Grande, Inc. operates a Portland cement manufacturing plant with coal fired rotary kilns and limestone quarry at the approximately 2,119 acre Tijeras facility. Tijeras Plant facility hours of operation described at <http://gccusa.com/tijeras> are Sunday 10:30 pm to Friday 10:30 pm and Saturday 5 am to 1 pm. Information on the Tijeras Plant history (construction began in 1958, operation in 1960) and Portland cement production stages is provided in the previous June 7, 2012 NPDES CEI report at:

<http://www.nmenv.state.nm.us/swqb/documents/swqbdocs/NPDES/Inspections/NM0000116-20120607.pdf>.

The predominant raw material used in the process is limestone, which is extracted from a quarry adjacent to the plant. Other raw materials, including silica, alumina, and iron are transported to the site via truck. Cement kiln dust (CKD) that is not reused is collected, pelletized (water added), transported and stored at the on-site quarry landfill. Much of the material storage and operations at the plant are inside buildings or covered. However, there are areas in the plant with sources of potential pollutants exposed to rainfall and snow. For example, coal, the plant's kiln main fuel source, is initially stored in a building, but is transported to an uncovered drop inlet tunnel, crushed and sent by an elevated conveyor belt to a storage silo. Coal dust was observed on the ground surface in the plant area. The plant has open containers and drums for metal recycling and to store metal bearings used in the cement grinding process. Covered fuel storage with secondary containment also exists at the plant. Other potential sources of pollutants for stormwater at the plant include detergent used in on-site vehicle cleaning activities. Permittee representatives provided a material safety data sheet for the detergent used in vehicle cleaning that indicated the following product and chemicals:

- Triple Play Sanitizer (2.54% didecyldimethylammonium chloride, 1.69% quaternary ammonium compounds, benzyl-c12-c16-alkyldimethyl, chlorides, 1-5% proprietary) .

Material safety data sheets provided by the permittee representatives for the biocide and corrosion inhibitor chemicals used in the cooling towers described the following products and chemicals:

- Spectrus OX909 (15-40% proprietary halogenated complex, 15-40% sodium sulphamidate, 7-13% sodium hydroxide);
- Spectrus NX1100 (5-10% 2-brom-2-nitropropane-1,3-diol; 1-5% magnesium nitrate; 1-5% 5-chloro-2-methyl-4-isothiazolin-3-one mixture with 2-methyl-4-isothiazolin-3-one; 1-5% magnesium chloride); and
- Gengard GN8113 (1-5% chlorotolyltriazole sodium salt).

Stormwater runoff from the mine areas of the facility would pond in low areas inside quarries, and may travel haul roads and Corral Canyon, then to a low area called "Frog Pond," then comingles with process waters at Quarry #1 pond in the northwest portion of the facility. Water well #2 house and truck scales at the cement silos are dewatered, using pumps and hoses, onto paved areas with drainage to the ditch along the south side of the plant. South of the mill building, a cooling water sump also has an overflow pipe that allows discharge onto paved areas with drainage to the ditch along the south side of the plant. The plant's drainage system (discharge flow paths) includes surface runoff, curb and constructed swales in paved areas, series of manmade unlined ditches, culvert, and drop inlets that would convey the plant's process water and stormwater by underground pipe with an outlet in a channel west of the Coal Building, then to Quarry #1 pond. When Quarry #1 pond overflows, discharges would likely occur from a low point at the berm associated with an access road north of the pond. There is no well-defined channel in the uneven surfaces of the limestone bedrock and soils at Outfall 001 in the north-northwest portion of the site. Photos of plant outfall, channel, Quarry #1 and location of Outfall 001 are provided below.

The Permittee reported discharge from Outfall 001 in August 1999, July and August 2006, and August 2014. USEPA Fact Sheet August 11, 2010 states “The production processes include procurement of raw materials, raw milking, kiln, clinker cooling and storage, product finishing, product storage and load out.” USEPA Public Notice for Draft NPDES Permit dated August 28, 2010 states “The facility plans to separate runoffs from quarry areas from the process water discharges by constructing a new retention pond to hold process wastewaters and runoffs from plant area and containing and reusing storm runoffs from quarry areas. Once the new retention pond is constructed, Outfall 001 will be replaced with a new outfall, Outfall 004.”

Section A - Permit Verification - Overall rating of “Marginal”

Permit Requirements

The cover or title page of the Permit provides the following information for the location of Outfall 004:

Outfall 004: Latitude: 35° 04' 20", Longitude: 106° 23' 04"

Part I.A.1 (Outfall 001 Limitations and Monitoring Requirements) of the Permit states:

During the period beginning the effective date of the permit and lasting through the dismantle of Outfall 001, the permittee is authorized to discharge storm runoffs from quarry, storage and production areas, once-through cooling water, cleaning water, and Artesian well water from Outfalls 001. Such discharges shall be limited and monitored by the permittee as specified below...

EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
		Standard Units			
POLLUTANT	STORET CODE	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	00400	6.0	9.0	1/Day	Grab

EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
		lbs/day, unless noted		mg/l, unless noted			
POLLUTANT	STORET CODE	30-Day Avg	Daily Max	30-Day Avg	Daily Max	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	50050	Report MGD	Report MGD	***	***	1/Day	Estimate
Total Suspended Solids	00530	N/A	N/A	N/A	50	1/Week	Grab
Total Aluminum	01105	N/A	N/A	N/A	0.75	1/Week	Grab
Dissolved Aluminum	01106	N/A	N/A	N/A	Report	1/Week	Grab
Total Copper	01042	N/A	N/A	N/A	0.011	1/Week	Grab
Dissolved Copper	01040	N/A	N/A	N/A	Report	1/Week	Grab
Total Hardness	46570	N/A	N/A	N/A	Report	1/Week	Grab

WHOLE EFFLUENT TOXICITY TESTING (48-Hour Static Renewal)	30-DAY AVG MINIMUM	48-HR MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Daphnia pulex	Report	Report	1/Year (2)	Grab

Footnote:
 (1) See Part II.B. for best management practices and discharge restrictions.
 (2) Perform WET testing at first discharge.

Part I.A.2 (Outfall 004 Limitations and Monitoring Requirements) of the Permit states:

During the period beginning the operation of Outfall 004 and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge storm runoffs from storage and production areas, once-through cooling water, cleaning water, and Artesian well water from Outfalls 004...

Part II.A (Other Conditions, Authorized Discharges) of the Permit states:

Discharges authorized in this individual permit are limited to once through cooling water, cooling tower blowdown, and storm water from the adjacent areas. There shall be no discharge of domestic sewage into Waters of the United States. Discharges of storm water runoff from outfalls other than Outfalls 001 and 004 shall be covered under the NPDES Multi-Sector Storm Water Permit. Runoffs from active quarry areas are not authorized. See section B of this Part for discharges from quarry areas.

Part II.B (Other Conditions, Best Management Practice) of the Permit states:

- 1. The operator shall take reasonable steps to maintain maximum capacities of retention ponds to contain the process wastewaters and storm water runoffs from manufacturing areas.*
- 2. Discharges are restricted to overflows from the retention pond due to catastrophic or chronic precipitation events.*
- 3. Discharges of storm water runoff from access roads in undisturbed areas shall be covered under the NPDES Multi-Sector Storm Water Permit.*
- 4. If a discharge of storm runoffs from quarry (mining) areas is necessary, the discharge must comply with effluent limitations established at Outfall 001.*

Part III.D.9 (Standard Conditions, Reporting Requirements, Other Information) of the Permit states:

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

Findings

- The location of authorized Outfall 004 on the cover or title page of the Permit appears incorrect.

Notes: GCC Rio Grande, Inc. application certified/signed by David Saegart, Former Tijeras Plant Manager on March 19, 2010 provided the latitude and longitude location of Outfall 004 which is the same location in the Permit. Figure 4 is an image of the permitted location of authorized Outfall 004 on the east side of the Tijeras Plant and Quarry. On-site permittee representatives during this CEI did not know why information provided in the application would locate Outfall 004 on the east side of the facility.

- A new outfall was not “operating” (term used in Part I.A.2 of the Permit) on the day of this CEI.

Notes: Trinity Consultants Report dated March 22, 2010, Page 3-5, which stated “GCC is requesting 36 months from the permit renewal to complete the new outfall location (Outfall 004) and retention pond,” was submitted with GCC Rio Grande, Inc. renewal application. Photo #8 is of a drawing showing location of proposed facility ponds north and west of the plant’s Coal Building. Pond location and design was not finalized according to permittee representatives on the day of this CEI. Runoff from quarry areas (disturbed, undisturbed, reclaimed, access roads, etc.) has not been separated from process waters with the construction of a new retention pond.

- There is no physical outfall structure to “dismantle” (term used in Part I.A.1 of the Permit) for the monitoring location of authorized Outfall 001.

- Mining area and other terms or phrases in the Permit may need clarification. For example, “active quarry areas” and “catastrophic or chronic precipitation events” in Part II.B of the Permit are not defined.

Section B - Recordkeeping and Reporting Evaluation - Overall rating of “Unsatisfactory” and Section E - Flow Measurement - Overall rating of “Marginal”

Permit Requirements

Part I.A and B of the Permit states:

NO DISCHARGE REPORTING

If there is no discharge event at this outfall during the sampling month, place an "X" in the NO DISCHARGE box located in the upper right corner of the preprinted Discharge Monitoring Report.

B. REPORTING OF MONITORING RESULTS (MINOR DISCHARGERS)

Monitoring results must be reported to EPA and NMED on either the electronic or paper Discharge Monitoring Report (DMR) approved formats.

Part II.D (Other Conditions, 24-Hour Oral Reporting: Daily Maximum Limitation Violations) of the Permit states:

Under the provisions of Part III.D.7.b.(3) of this permit, violations of daily maximum limitations for the following pollutants shall be reported orally to EPA Region 6, Compliance and Assurance Division, Water Enforcement Branch (6EN-W), Dallas, Texas, within 24 hours from the time the permittee becomes aware of the violation followed by a written report in five days.

Total aluminum and total copper.

Excerpts from Part III.C (Standard Conditions, Monitoring and Records) of the Permit state:

3. Retention of Records

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, or application. This period may be extended by request of the Director at any time.

4. Record Contents

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurements;*
- b. The individual(s) who performed the sampling or measurements;*
- c. The date(s) and time(s) analyses were performed;*
- d. The individual(s) who performed the analyses;*
- e. The analytical techniques or methods used; and*
- f. The results of such analyses.*

5. Monitoring Procedures

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

Excerpts from Part III.D (Standard Conditions, Reporting Requirements) of the Permit state:

4. Discharge Monitoring Reports and Other Reports

Monitoring results must be reported to EPA on either the electronic or paper Discharge Monitoring Report (DMR) approved formats...Duplicate copies of paper DMR's and all other reports shall be submitted to the appropriate State agency (ies) at the following address (es)...

7. Twenty-Four Hour Reporting

a. The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall be provided within 5 days of the time the permittee becomes aware of the circumstances. The report shall contain the following information: (1) A description of the noncompliance and its cause; (2) The period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and, (3) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

b. The following shall be included as information which must be reported within 24 hours: (1) Any unanticipated bypass which exceeds any effluent limitation in the permit; (2) Any upset which exceeds any effluent limitation in the permit; and, (3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Director in Part II (industrial permits only) of the permit to be reported within 24 hours.

c. The Director may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

8. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Parts III.D.4 and D.7 and Part I.B (for industrial permits only) at the time monitoring reports are submitted. The reports shall contain the information listed at Part III.D.7.

11. Signatory Requirements

All applications, reports, or information submitted to the Director shall be signed and certified.

Findings

DMR Findings

- DMRs for Outfall 001A (10/2011, 12/2011) and Outfall 004A (07/2014, 08/2014, 09/2014, 10/2014, 11/2014 and 12/2014) are indicated as “Not Received” based on a summary of monthly DMRs / quarterly report submittals from the effective date of the permit obtained from USEPA Region 6 NetDMR & ICIS-NPDES Coordinator (6EN-WC) .

Notes: NMED SWQB has a copy of Outfall 001A October and December 2011 DMRs. Permittee representative provided a mail tracking receipt returned from USEPA for the transmittal letter of the fourth quarter 2011 DMRs. Reason for USEPA indicating that the monthly October and December 2011 DMRs were not received was not determined. The Permittee can contact USEPA Region 6 to confirm receipt, submit corrected and/or re-submit DMRs (with copy to NMED).

- Separate toxicity DMRs for Outfall 001 (TX1Y) and Outfall 004 (TX4Y) using the correct discharge number and yearly monitoring period were not submitted (also indicated as “Not Received” by USEPA).

Notes: Discharge number on DMRs consists of a combination of four alpha and numeric characters (e.g., 001A, 002Q, 003S, 004Y). The first two characters of the discharge number are “TX” for biomonitoring (toxicity) reporting. The last two characters are usually an assigned code used for agency tracking purposes (e.g., TX1A, TX1S, TX1Y, etc.).

The Permittee can submit the following reported “No Discharge” or, in the case of the Outfall 001 August 2014 discharge “Analysis Was Not Conducted” toxicity DMRs to USEPA Region 6 (with copy to NMED):

<u>TX1Y DMRs</u>	<u>TX4Y DMRs</u>
12/01/10-11/30/11	12/01/10-11/30/11
12/01/11-11/30/12	12/01/11-11/30/12
12/01/12-11/30/13	12/01/12-11/30/13
12/01/13-11/30/14	12/01/13-11/30/14

- Invalid results of pH monitoring and dissolved metal analysis were reported on Outfall 001A August 2014 DMR. See Section F Laboratory for further explanation for approved methods--holding times and filter requirements. The Permittee can submit a corrected Outfall 001 August 2014 DMR to USEPA Region 6 (with copy to NMED).

Retention of Records, Content, Calibration Record Findings

- Part I.A.1 of the Permit requires reporting of estimate daily maximum and 30-day average flow measurements. Requested flow measurement recordkeeping for flow measurement estimates of the reported Outfall 001 August 2014 discharge (0.6 MGD) was not provided (not available) during this CEI.
- Analytical recordkeeping (benchsheet) for pH monitoring of the reported Outfall 001 August 2014 discharge did not record exact place, individual who performed the sampling, and analytical method used. See Section F Laboratory for further explanation on approved methods.
- Results of the buffer calibration, in this case calibration using the 7 and 10 buffers, were not recorded on the reviewed bench sheet. Requested buffer calibration recordkeeping was not provided (not available) during this CEI.

24-Hour Oral Reporting/Non Compliance Reporting Findings

- Requested confirmation and/or documentation that 24-hour oral reporting and written report required in Part III.D 7 of the Permit to USEPA was conducted and submitted for Outfall 001 August 2014 discharge total aluminum and total copper exceedances was not provided (not available) during this CEI.

Notes: The contract laboratory report to Kevin Adams, GCC Rio Grande, Inc. with results exceeding permit total aluminum and total copper was dated August 22, 2014. Outfall 001A August 2014 DMR indicating total aluminum and total copper exceedances was signed/certified by Kevin Adams, GCC Corporate Environmental Manager on October 22, 2014. NMED SWQB files do not contain documentation that 24-hr reporting occurred. NMED SWQB files do not contain documentation of a follow up written 5 day report or USEPA waiver.

- Based on NMED SWQB files, non-compliance information (e.g., required WET analysis was not conducted, total aluminum and total copper exceedances) submitted with Outfall 001A August 2014 DMR was not a complete report. The non-compliance information did not include “*Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge*” listed at Part III.D.7 of the Permit. The non-compliance information was not certified per Part III.D.11 of the Permit.

Notes: Non-compliance information was included in GCC, Rio Grande, Inc. transmittal letter to NMED SWQB Program Manager dated October 22, 2014. NMED SWQB files do not include a copy of a non-compliance transmittal letter to USEPA Region 6. Transmittal letters w/DMRs should be submitted (addressed) to USEPA with a copy sent to NMED at the address in Part III of the Permit.

Electronic Reporting / NetDMR Comments

A print out of the web page for USEPA NetDMR electronic reporting system was provided to on-site permittee representatives during this CEI. USEPA is encouraging permittees to transition from submitting DMRs as paper copies to the NetDMR system. Information on the NetDMR training can be found at: <http://epa.gov/netdmr/about/training.html>.

Section C - Operations and Maintenance - Overall rating of “Marginal”

Permit Requirements

Conditions in Part II.B (Other Conditions, Best Management Practice) of the Permit were provided above.

Part III B.3.a (Standard Conditions, Proper Operation and Maintenance) of the Permit states:

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit...

Findings

- On-site permittee representatives described that there was no schedule for maintenance or specifications for capacity for Quarry #1 pond. Reasonable steps to maintain maximum capacities of retention ponds and procedures to define catastrophic or chronic precipitation events was not documented.

Notes: Retention ponds/sediment basis are discussed in the facility’s MSGP stormwater pollution prevention plan (SWPPP) Revision Date 01/12/2010 and in the facility’s MSGP Annual Comprehensive Inspection Reports and written quarterly inspections. The SWPPP did not provide written procedures (steps) to maintain maximum capacities or to monitor and document precipitation events (e.g., specifications or capacity, calculations or documentation of required free board during year or prior to the summer thunderstorm season, requirements or schedule for removal of accumulated sediment, upgradient stabilization practices, etc.).

Section D - Self-Monitoring - Overall rating of “Unsatisfactory” and Section F - Laboratory - Overall rating of “Unsatisfactory”

Permit Requirements

Part I.A.1 (Outfall 001 Limitations and Monitoring Requirements) of the Permit for WET monitoring were provided above. Part II.F (Whole Effluent Toxicity Testing) of the Permit states:

It is unlawful and a violation of this permit for a permittee or his designated agent...to delay sample shipment...

Part III B.3.a (Standard Conditions, Proper Operation and Maintenance) of the Permit state “...*Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.*”

Part III B.3.b (Standard Conditions, Proper Operation and Maintenance) of the Permit state:

...The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

Part III.C.5 a and c (Standard Conditions, Monitoring Procedures) of the Permit state:

a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

Findings

- Whole Effluent Toxicity analysis was not performed or conducted at a frequency of 1/year for the first discharge specified as in the permit for the reported Outfall 001 August 2014 discharge. A WET sample was collected on August 13, 2014, but not shipped to the biomonitoring laboratory indicated in the Permittee's written procedures.

Notes: Table II (Required Containers, Preservation Techniques, and Holding Times) in 40 CFR 136.3, effective June 18, 2012, requires a maximum holding time for aquatic toxicity or WET testing of "36 hours." GCC Stormwater Sampling Plan revision date June 7, 2012 Attachment #5 and #5a provides example chain of custody (COC) form and shipping label for Bio-Aquatic Testing, Inc. in Carrollton, Texas.

Kevin M. Adams, Corporate Environmental Manager, GCC Rio Grande transmittal letter to NMED dated October 22, 2014 states "*...the test could not be conducted given that the holding time for the sample/test had been exceeded. The rainfall and discharge was late in the day after the lab was closed, so the lab was not able to pick up the samples until the next morning. Therefore the WET test could not be initiated the same day as sample collection.*"

According Mr. Gomez, he collected a sample for WET monitoring during the August 13, 2014 discharge. The time recorded for sample collection on the COC form was "1700" on 08/13 (5 pm on Wednesday)—see Hall Environmental Analysis Laboratory, Inc. report dated August 22, 2014 (attached). A request for WET analysis and preservation is not recorded on the COC. The recorded time on the COC that samples were relinquished to the contract laboratory was "10:03" on 08/14/14 (10:03 am on Thursday).

By the time a sample was described and recorded to be relinquished to an analytical contract laboratory, the holding time was 17 hours into the 36 hour maximum holding time required in 40 CFR 136.3. Documentation of expedited shipment to the bio-monitoring laboratory indicated in GCC Rio Grande, Inc. written procedures was not provided (not available) during this CEI.

- Techniques for instrument calibration and analysis described on the pH benchsheet and GCC Stormwater Sampling Plan revision date June 7, 2012 did not include (list) a hydrogen ion (pH) analytical method approved in 40 CFR 136.3.

Notes: Table IB (List of Approved Inorganic Test Procedures) in 40 CFR 136.3 lists the following approved methods for hydrogen ion (pH) monitoring:

- Standard Methods (SM) 4500–H+ B–2000;
- ASTM D1293–99 (A or B);
- 973.41¹; and
- I–1586–85²

¹ Official Methods of Analysis of the Association of Official Analytical Chemists, Methods Manual, Sixteenth Edition, 4th Revision, 1998. AOAC International.

² Methods for Analysis of Inorganic Substances in Water and Fluvial Sediments, Techniques of Water-Resource Investigations of the U.S. Geological Survey, Book 5, Chapter A1., unless otherwise stated. 1989. USGS.

- pH monitoring did not meet holding times approved in 40 CFR 136.3. Both the recorded on-site analysis result and the reported contract laboratory result of the Outfall 001 August 2014 discharge did not meet the holding time and were invalid.

Notes: Table II in 40 CFR 136.3 requires a maximum holding time for pH monitoring of “analyze within 15 minutes.” The analytical result recorded on the on-site pH benchsheet for a sample measurement date of 8-13-14 was recorded to be 8.34. The “Sample Time Collected” recorded on the benchsheet was 17:00 and the “Time pH Read” was 17:43 which exceeded the 15 minute holding time. GCC Rio Grande, Inc. Outfall 001A August 2014 DMR reported a pH of 8.06. Contract laboratory report cover page and Page 1 of 5 of the report indicate that the pH result (8.06 pH units or standard units) was qualified—“*Holding times for preparation or analysis exceeded.*”

- Grab samples collected of the Outfall 001 August 2014 discharge for dissolved metal monitoring (dissolved aluminum and dissolved copper) required in Part I.A.1 of the Permit were not filtered within 15 minutes of collection as required in Table II Footnote #7 of 40 CFR 136.3. Footnote #7 states “*For dissolved metals, filter grab samples within 15 minutes of collection and before adding preservatives....*” According to the contract laboratory, samples were filtered and preserved at the contract laboratory. Reported contract laboratory results were invalid.
- pH buffer supplies were not recorded to be maintained on the day of the Outfall 001 August 2014 discharge. Benchsheet for pH monitoring indicated that the pH 7, 9.18 and 10 buffers had expired May 2014 prior to sample collection date in August 2014. Based on observed sample containers and buffers on the day of this CEI, re-stocking of equipment appeared needed.
- Written quality control procedures were revised following the previous June 7, 2012 NPDES CEI report; however, the revised written procedures do not appear adequate to ensure compliance with permit conditions. Revisions or additions that appear needed include:
 - Recordkeeping and record retention for pH instrument calibration;
 - Procedures to ensure buffers for required pH instrument calibration and analysis are not expired;
 - Written documentation (paper or on-line copy) of approved pH analysis method and procedures;

Notes: For example, reviewed on-site pH instrument calibration logs describe the use of two buffers for calibration and one buffer standardization or check prior to sample analysis. SM 4500–H+ B–2000 specifies instrument calibration according to manufacture’s procedures and standardization procedures using three buffers prior to sample analysis.

- Expedited sample shipment instructions to WET contract laboratory;

- o Procedures (e.g., to conduct field analysis if travel time to office laboratory location exceeds holding time, repeat sample collection and analysis if holding times exceeded) to ensure pH monitoring maximum holding times are met;
- o Dissolved metal sample filtration and acid preservation procedures;
- o Cooling preservation procedures (e.g., correct temperatures, certified thermometer and record keeping for samples during storage).

Notes: For example, Rio Grande, Inc. written procedures state “*appropriate samples will be stored at 40°F +/-5°F.*” When required for certain parameter (e.g., TSS, WET) cooling preservation in Table II in 40 CFR 136.3 are “*Cool, ≤6°C.*” Conversion of 6°C (6°C × 9/5 + 32) = 42.8°F. A temperature of 45°F (7.2°C) indicated in the written procedures would exceed maximum cooling preservation requirements.

- o Collection of duplicate samples;

Notes: Duplicate samples were not collected and analyzed for Outfall 001 August of 2014 discharge. USEPA’s NPDES Inspection Manual states “*10 percent of the samples should be duplicated.*” Approved analytical methods may also specify quality control/quality assurance procedures. Since past discharges have not occurred every year, more frequent duplicates may be needed (e.g., duplicates obtained for each parameter at every batch or sampling event) to check possible field and/or laboratory sampling errors.

Additional staff training (e.g., re-training on revised sample collection and analysis procedures, refresher training prior to the summer thunderstorm season, etc.) appears needed to ensure staff can carry out operation, maintenance and testing functions in compliance with the conditions of this Permit.

Section G - Effluent/Receiving Waters Observations - Overall rating of “Unsatisfactory”

Permit Requirements and Findings

Photo #1 is of a cell phone video of the August 13, 2014 discharge at Outfall 001 obtained from permittee representatives. The video is available at:

<https://cloud.env.nm.gov/water/resources/3wdGf2YvWP7JR8htsQErkMxbvE56mnoqDRp2BQAIXXbigEetSCEhgT9cBlqLEUu1ieqDbrov0MT0Go/v0czSFQOm6aZBEE1YpYuYa6uh5Dd2ttYFOOlnCRioE1noqSAMGS49n6KAiCU=.mov>

Pollutant effluent limitations in Part I.A of the Permit for Outfall 001 were provided above. The following self-monitoring results of the discharge at Outfall 001 on August 13, 2014 exceeded permit limitations or were invalid:

Pollutant	Daily Max Limitation in Part I.A.1 of the Permit	Reported Exceedance
pH	6 to 9 s.u.	Invalid Result
TSS	50 mg/L	1,200 mg/L
Total Aluminum	0.75 mg/L	30 mg/L
Total Copper	0.011 mg/L	0.040 mg/L

Because the monitoring results were invalid, it is unknown if the pH of the Outfall 001 August 2014 discharge was within effluent limitations.

Figure 1: General Site Map – Topographic Map

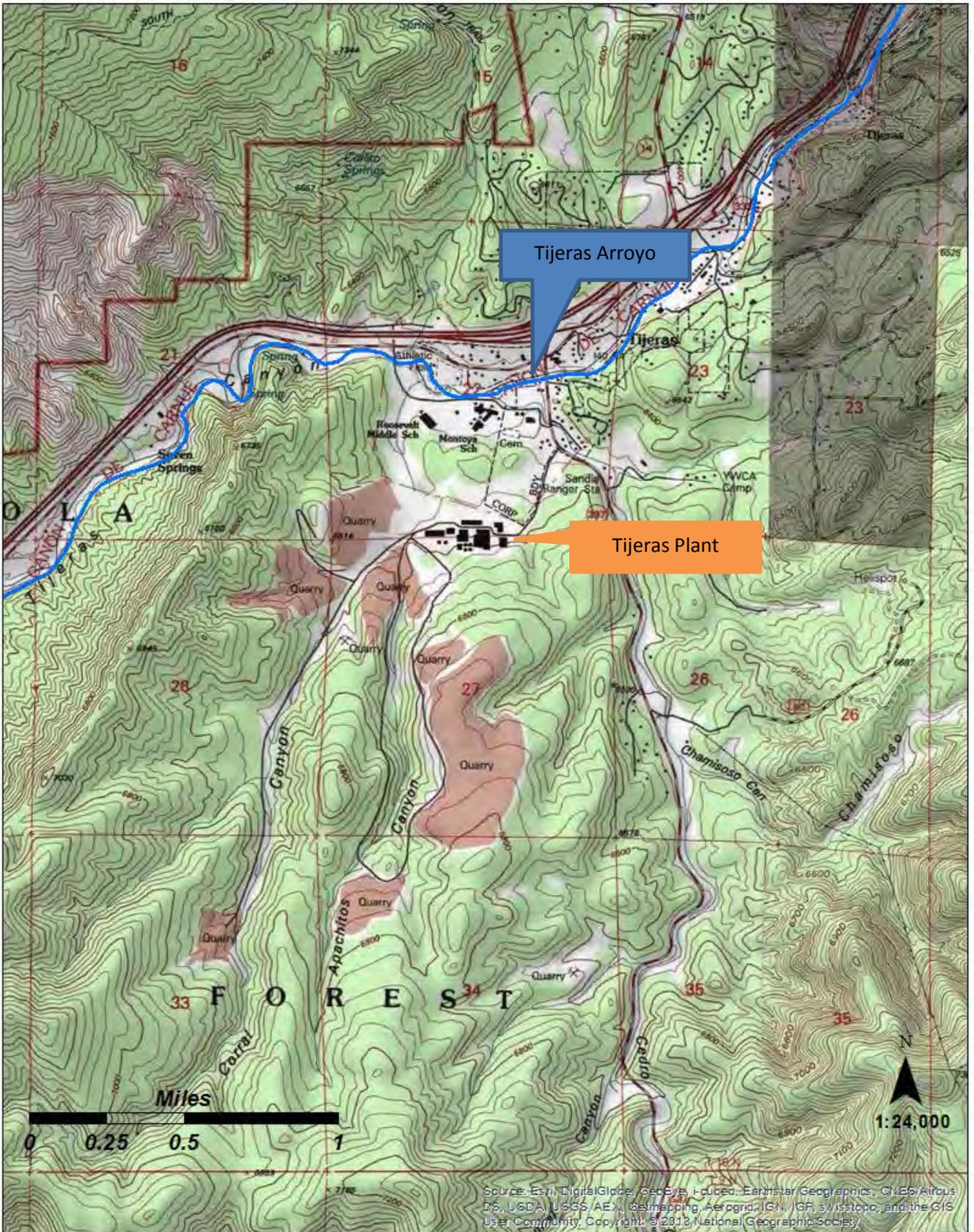
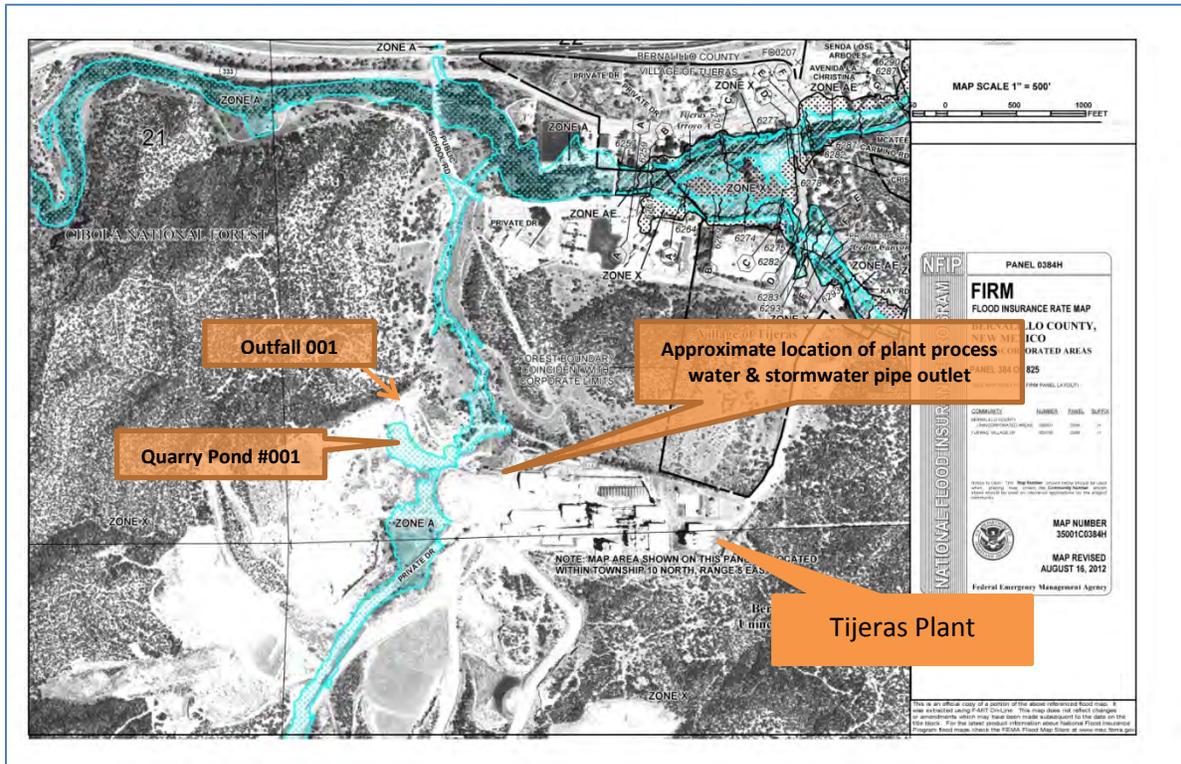


Figure 2: General Site Map – Image

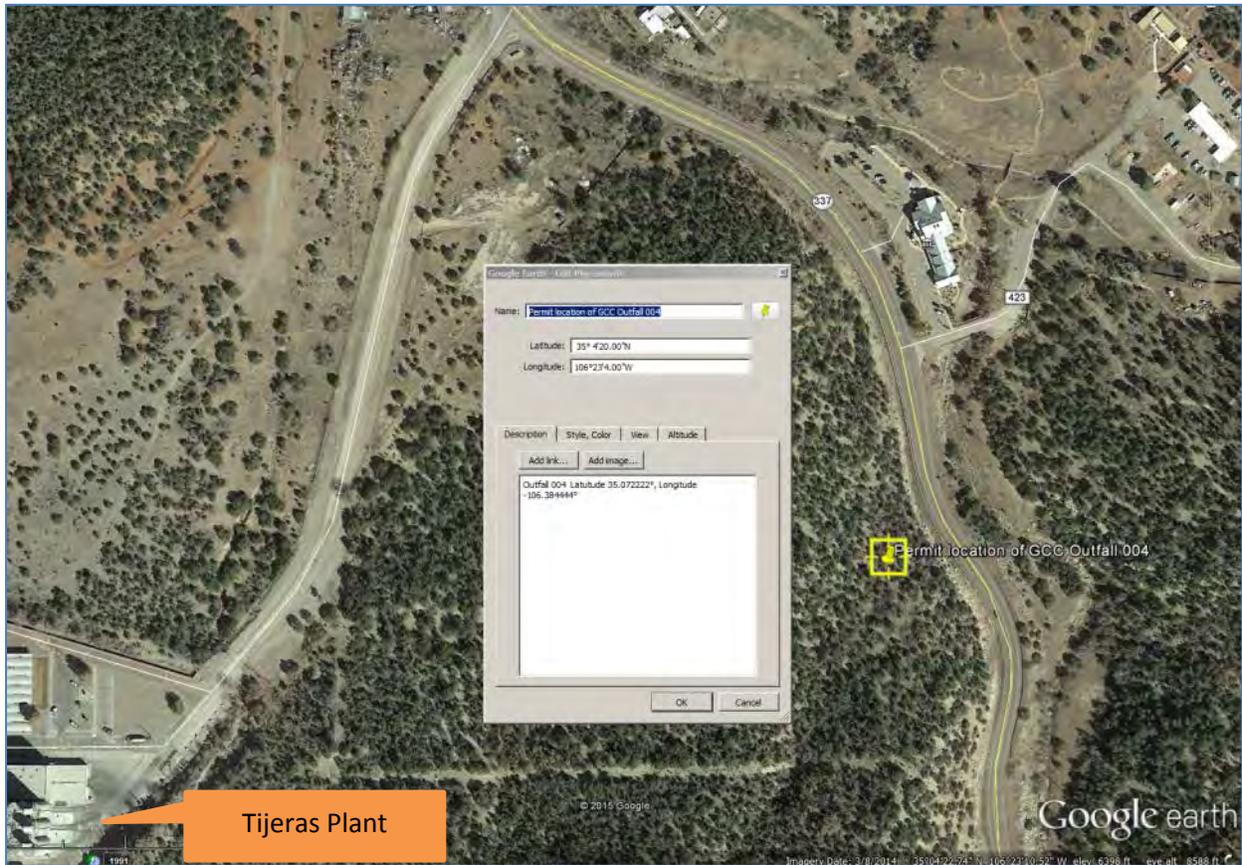


Figure 3: General Site Map, NFIP Flood Zones, Map Revised August 16, 2012



Notes: Arrow points to approximate location of authorized Outfall 001 location (overflow low area of Quarry Pond #001). Although shown continuous, berms and roads interrupt or exist within Flood Zone A. A channel from the plant process and stormwater outlet continues in Flood Zone A shown above toward Quarry #1 pond.

Figure 4: Permit Location for Authorized Outfall 004



NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1332 hours
City/County: Tijeras / Bernalillo County	State: New Mexico	
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: pH benchsheet for Outfall 001 August 13, 2014 discharge monitoring		

Don Velasco


Stormwater Sampling Plan

Attachment # 4: 2-point pH Calibration Record with 9.18 pH reference

DAY 1					
Calibration Date	pH 7.00 Expiration Date	pH 9.18 Expiration Date	pH 10.00 Expiration Date	Calibration Slope (See Step 11)	Analyst Signature
8-13-14	05-20-14	05-20-14	05-20-14	16.5	<i>[Signature]</i>
Sample pH Measurement Date	Sample Time Collected	9.18 Buffer ACTUAL pH	Time pH Read	Observed pH Reading	Analyst Signature
8-13-14	17:00	9.12	17:45	8.34	<i>[Signature]</i>
DAY 2					
Calibration Date	pH 7.00 Expiration Date	pH 9.18 Expiration Date	pH 10.00 Expiration Date	Calibration Slope (See Step 11)	Analyst Signature
Sample pH Measurement Date	Sample Time Collected	9.18 Buffer ACTUAL pH	Time pH Read	Observed pH Reading	Analyst Signature

NOTES:

- pH buffer solutions must be checked for expiration date. These must be documented in the form.
- pH buffers 7 and 10 will be used to calibrate the pH meter following steps B1 thru B10.
- Record slope information (SLP-from calibration data) Step B11.
- pH buffer 9.18 will be read and recorded after calibration and prior to sample pH measurement.
- Measure collected sample and record.
- This form must be returned to Environmental Specialist after samples have been collected.

03/18/2015 13:32

Revision date: 7 June 2012 Page: 10 of 15

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1340 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Photograph of permittee representative cell phone video of Outfall 001 discharge (Wednesday, August 13, 2014 at 4:35:47 pm). The discharge in the video appears highly turbid and brown in color. Permittee representatives stated that the discharge continued for approximately 2 hours.		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1358 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Looking south-southeast, Quarry #1 pond from overflow low area near Outfall 001. Mining areas (active & reclaimed) in background		



NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1400 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Looking north, limestone bedrock at Outfall 001 (see Photo #1).		



NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1404 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Looking generally west at Quarry Pond #001, arrow points to channel that enters pond.		



NMED/SWQB Official Photograph Log Photo # 5		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1407 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Arrow points to rock in channel opening between "Frog Pond" and southeast corner Quarry #1 pond.		



NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1407 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Channel between plant process and storm water pipe outlet (next photo) and Quarry #1 pond.		



NMED/SWQB Official Photograph Log Photo # 7		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1414 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Plant process water and stormwater pipe outlet. Pounded water below outlet did not continue to channel shown in previous photo.		



NMED/SWQB Official Photograph Log Photo # 8		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1517 hours
City/County: Tijeras / Bernalillo County	State: New Mexico	
Location: GCC Rio Grande, Inc. / Tijeras Plant		
Subject: Drawing showing location of proposed facility ponds north and west of the coal building at the plant.		



Attachment to March 18 & 19, 2015 CEI Report
GCC Rio Grande, Inc., Contract Laboratory Report



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

August 22, 2014

Kevin Adams
GCC Rio Grande, Inc.
PO Box 100
Tijeras, NM 87059
TEL: (505) 286-6026
FAX

RE: Tijeras Outfall 001

OrderNo.: 1408722

Dear Kevin Adams:

Hall Environmental Analysis Laboratory received 1 sample(s) on 8/14/2014 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Freeman', is written over a light blue horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

CLIENT: GCC Rio Grande, Inc. Client Sample ID: GCC 8/13 Water Sample
 Project: Tijeras Outfall 001 Collection Date: 8/13/2014 5:00:00 PM
 Lab ID: 1408722-001 Matrix: AQUEOUS Received Date: 8/14/2014 10:03:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 200.7: DISSOLVED METALS							Analyst: JLF
Aluminum	1.8	0.10	*	mg/L	5	8/18/2014 1:36:16 PM	R20639
Copper	ND	0.0060		mg/L	1	8/18/2014 1:34:25 PM	R20639
EPA METHOD 200.7: TOTAL METALS							Analyst: JLF
Aluminum	30	2.0	*	mg/L	100	8/18/2014 1:08:30 PM	14793
Calcium	170	10		mg/L	10	8/18/2014 1:01:51 PM	14793
Copper	0.040	0.0060		mg/L	1	8/18/2014 12:31:33 PM	14793
Magnesium	15	1.0		mg/L	1	8/18/2014 12:31:33 PM	14793
SM2340B: HARDNESS							Analyst: JLF
Hardness (As CaCO3)	500	6.6		mg/L	1	8/18/2014 10:43:00 AM	R20639
SM4500-H+B: PH							Analyst: JRR
pH	8.06	1.68	H	pH units	1	8/18/2014 5:48:32 PM	R20657
SM2540C MOD: TOTAL DISSOLVED SOLIDS							Analyst: KS
Total Dissolved Solids	600	200	*	mg/L	1	8/18/2014 2:53:00 PM	14787
SM 2540D: TSS							Analyst: KS
Suspended Solids	1200	40		mg/L	1	8/15/2014 5:45:00 PM	14791

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level	B Analyte detected in the associated Method Blank	
	E Value above quantitation range	H Holding times for preparation or analysis exceeded	
	J Analyte detected below quantitation limits	ND Not Detected at the Reporting Limit	Page 1 of 5
	O RSD is greater than RSDlimit	P Sample pH greater than 2	
	R RPD outside accepted recovery limits	RL Reporting Detection Limit	
	S Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1408722
22-Aug-14

Client: GCC Rio Grande, Inc.
Project: Tijeras Outfall 001

Sample ID	MB	SampType:	MBLK	TestCode:	EPA Method 200.7: Dissolved Metals					
Client ID:	PBW	Batch ID:	R20639	RunNo:	20639					
Prep Date:		Analysis Date:	8/18/2014	SeqNo:	600352	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020								
Copper	ND	0.0060								

Sample ID	LCS	SampType:	LCS	TestCode:	EPA Method 200.7: Dissolved Metals					
Client ID:	LCSW	Batch ID:	R20639	RunNo:	20639					
Prep Date:		Analysis Date:	8/18/2014	SeqNo:	600353	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	0.56	0.020	0.5000	0	113	85	115			
Copper	0.48	0.0060	0.5000	0	96.9	85	115			

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1408722

22-Aug-14

Client: GCC Rio Grande, Inc.

Project: Tijeras Outfall 001

Sample ID	MB-14793	SampType:	MBLK	TestCode:	EPA Method 200.7: Total Metals					
Client ID:	PBW	Batch ID:	14793	RunNo:	20639					
Prep Date:	8/15/2014	Analysis Date:	8/18/2014	SeqNo:	600509	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020								
Calcium	ND	1.0								
Copper	ND	0.0060								
Magnesium	ND	1.0								

Sample ID	LCS-14793	SampType:	LCS	TestCode:	EPA Method 200.7: Total Metals					
Client ID:	LCSW	Batch ID:	14793	RunNo:	20639					
Prep Date:	8/15/2014	Analysis Date:	8/18/2014	SeqNo:	600510	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	0.51	0.020	0.5000	0	103	85	115			
Copper	0.50	0.0060	0.5000	0	100	85	115			

Sample ID	LCS CAT-14793	SampType:	LCS	TestCode:	EPA Method 200.7: Total Metals					
Client ID:	LCSW	Batch ID:	14793	RunNo:	20639					
Prep Date:	8/15/2014	Analysis Date:	8/18/2014	SeqNo:	600511	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Calcium	50	1.0	50.00	0	100	85	115			
Magnesium	50	1.0	50.00	0	101	85	115			

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1408722

22-Aug-14

Client: GCC Rio Grande, Inc.

Project: Tijeras Outfall 001

Sample ID	MB-14787	SampType:	MBLK	TestCode:	SM2540C MOD: Total Dissolved Solids					
Client ID:	PBW	Batch ID:	14787	RunNo:	20635					
Prep Date:	8/15/2014	Analysis Date:	8/18/2014	SeqNo:	600134	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Total Dissolved Solids	ND	20.0								

Sample ID	LCS-14787	SampType:	LCS	TestCode:	SM2540C MOD: Total Dissolved Solids					
Client ID:	LCSW	Batch ID:	14787	RunNo:	20635					
Prep Date:	8/15/2014	Analysis Date:	8/18/2014	SeqNo:	600135	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Total Dissolved Solids	1040	20.0	1000	0	104	80	120			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1408722

22-Aug-14

Client: GCC Rio Grande, Inc.

Project: Tijeras Outfall 001

Sample ID	MB-14791	SampType:	MBLK	TestCode:	SM 2540D: TSS					
Client ID:	PBW	Batch ID:	14791	RunNo:	20615					
Prep Date:	8/15/2014	Analysis Date:	8/15/2014	SeqNo:	599662	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDI limit	Qual
Suspended Solids	ND	4.0								

Sample ID	LCS-14791	SampType:	LCS	TestCode:	SM 2540D: TSS					
Client ID:	LCSW	Batch ID:	14791	RunNo:	20615					
Prep Date:	8/15/2014	Analysis Date:	8/15/2014	SeqNo:	599663	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	88	4.0	92.40	0	95.2	82.47	119.05			

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- H Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pII greater than 2.
- RL Reporting Detection Limit



Hall Environmental Analysts Laboratory
 4901 Hawkins NE
 Albuquerque, NM 87105
 TEL: 505-345-3975 FAX: 505-345-4107
 Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: GCC RIO GRANDE, INC.

Work Order Number: 1408722

RcptNo: 1

Received by/date: AG 08/14/14

Logged By: **Michelle Garcia** 8/14/2014 10:03:00 AM *Michelle Garcia*

Completed By: **Michelle Garcia** 8/14/2014 1:08:47 PM *Michelle Garcia*

Reviewed By: *[Signature]* 08/14/14

Chain of Custody

- Custody seals intact on sample bottles? Yes No Not Present
- Is Chain of Custody complete? Yes No Not Present
- How was the sample delivered? Client

Log In

- Was an attempt made to cool the samples? Yes No NA
- Were all samples received at a temperature of >0° C to 6.0°C Yes No NA
- Sample(s) in proper container(s)? Yes No
- Sufficient sample volume for indicated test(s)? Yes No
- Are samples (except VOA and ONG) properly preserved? Yes No
- Was preservative added to bottles? Yes No NA
See Section 17.
- VOA vials have zero headspace? Yes No No VOA Vials
- Were any sample containers received broken? Yes No
- Does paperwork match bottle labels? Yes No
(Note discrepancies on chain of custody)
- Are matrices correctly identified on Chain of Custody? Yes No
- Is it clear what analyses were requested? Yes No
- Were all holding times able to be met? Yes No
(If no, notify customer for authorization.)

of preserved bottles checked for pH: 2

Adjusted? yes

Checked by: *[Signature]*

Special Handling (if applicable)

- Was client notified of all discrepancies with this order? Yes No NA

Person Notified: _____ Date: _____

By Whom: _____ Via: eMail Phone Fax In Person

Regarding: _____

Client Instructions: _____

17. Additional remarks: *For dissolved Metals analysis: Filtered anal added 0.4 ml HNO3 to -00C for acceptable pH. AG 08/14/14*

18. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	900	Not Good	Not Present			

Attachment

Operator Response

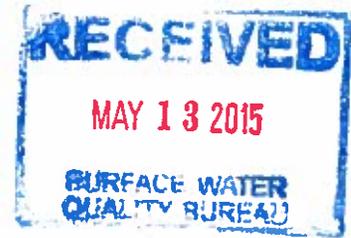


John

Via Certified Mail No.: 7014 0510 0000 8248

7 May 2015

Mr. Bruce Yardin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Division
P.O. Box 5469
Santa Fe, NM 87502



*RE: Response to NPDES Compliance Evaluation Inspection
GCC Rio Grande, Inc.
Individual Permit No. NM1000016
MSGP No. NMR05GD23*

Dear Mr. Yardin:

GCC Rio Grande, Inc. is submitting this response to the reports received April 9, 2015 regarding the New Mexico Environment Department's (NMED) findings during the NPDES Compliance Evaluation Inspections conducted at our Tijeras facility on March 18 and 19, 2015. Following the inspection, GCC initiated several corrective actions and is developing a compliance schedule to address the unresolved findings.

In reference to the unsatisfactory findings related to the sampling and analysis of the August 2014 discharge, the following corrective actions are being implemented:

- The site sampling procedure is being revised to reflect comments from the inspection and report
- Training on proper sampling and flow measurement techniques is scheduled for June 2015. The following topics will be included in this training:
 - Holding times requirements
 - Proper sampling and flow measurement techniques
 - Reporting procedures in the event of a noncompliance
 - Records retention requirements
- A new, more user friendly pH meter has been purchased along with a backup meter in case of malfunction
- pH buffer solution is now a stock item in the warehouse to ensure that an unexpired solution is always available
- A bimonthly pH meter calibration and maintenance program is being implemented

GCC has also been seeking contractor bids for a design plan to maximize the holding capacity of the pond. Through this project, we intend to minimize the possibility of a discharge and to comply with Best Management Practice to properly maintain the control system. The construction of Outfall 004 will also fall under the scope of this project and GCC plans to correct the inaccurate location of the Outfall during the upcoming permit renewal process.

Following the permit renewal process, GCC will be updating the Stormwater Pollution Prevention Plan per the findings noted in the Multi Sector General Permit inspection report and incorporating any changes that occur during the renewal.



Additionally, please see attached toxicity Discharge Monitoring Reports that are being submitted to EPA and NMED as recommended by NMED. Historically, the facility submitted the results of the Whole Effluent Toxicity testing as a part of the 001A and 004A DMRs.

I will provide updates as the corrective actions are completed and as the development of the compliance schedule continues. We appreciate this opportunity to improve our systems of compliance.

Please contact me at (505) 286-6026 or at svance@gcc.com if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Sarah Vance'.

Sarah Vance
Environmental Engineer

Cc: Racquel Douglas, USEPA Region VI
Erin Trujillo, NMED Surface Water Quality Bureau

Enclosures



Via Certified Return Receipt Number: 7014 0510 0000 3221 8224

May 7, 2015

Gladys Gooden-Jackson
U.S. Environmental Protection Agency, Region VI (6EN-WC)
Lead EPS, New Mexico State Coordinator
NPDES Compliance Monitoring Section
Water Enforcement Branch
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: 2010-2014 Toxicity Discharge Monitoring Reports
GCC Rio Grande, Inc. Tijeras Facility
Permit No. NM0000116
Outfalls TX1Y, TX4Y

Dear Ms. Gooden-Jackson:

Historically, GCC Rio Grande, Inc. Tijeras facility has submitted the results of the Whole Effluent Toxicity testing as a part of the 001A and 004A Discharge Monitoring Reports. During a recent surface water inspection, we were informed that a separate Toxicity DMR needs to be completed for each calendar year. Please find enclosed GCC's Toxicity Discharge Monitoring Reports for 2010-2014. Only one discharge occurred during that time and toxicity testing was not completed during that event.

Please do not hesitate to call or email me at 505-286-6026 if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in cursive script that reads 'Sarah Vance'.

Sarah Vance
Environmental Engineer

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
 NAME GCC Rio Grande, Inc.
 ADDRESS P.O. Box 100
 Tijeras, NM 87059

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 (2-19)

TXLY
 DISCHARGE NUMBER

Form Approved.
 OMB No. 2040-0004
 Approval expires 05-31-88

FACILITY LOCATION
 11783 Hwy 337 South
 Tijeras, NM 87059

MONITORING PERIOD
 YEAR MO DAY YEAR MO DAY
 FROM 10 12 01 TO 11 11 30
 (20-21) (22-23) (24-25) (26-27) (28-29) (30-31)

Check here if No Discharge
 NOTE: Read Instructions before completing this form

PARAMETER (32-37)	(3 Card Only) (46-53) QUANTITY OR LOADING (54-61)			(4 Card Only) (38-45) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
Whole Effluent Toxicity Testing Daphnia pulex	SAMPLE MEASUREMENT	*****	****	NO	Discharge	*****		1	Grab
	PERMIT REQUIREMENT	*****	****	*****	*****	Report		Year	
SAMPLE MEASUREMENT									
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PERMITTEE NAME/ADDRESS (include Facility Name/Location if Different)
 NAME GCC Rio Grande, Inc.
 ADDRESS P.O. Box 100
 Tijeras, NM 87059

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 (17-19)
 TX1Y
 DISCHARGE NUMBER

Form Approved.
 OMB No. 2040-0004
 Approval expires 05-31-98

FACILITY LOCATION
 11783 Hwy 337 South
 Tijeras, NM 87059

MONITORING PERIOD
 YEAR MO DAY YEAR MO DAY
 FROM 11 12 01 TO 12 11 30
 (20-21) (22-23) (24-25) (26-27) (28-29) (30-31)

Check here if No Discharge
 NOTE: Read Instructions before completing this form

PARAMETER (32-37)	(3 Card Only) (46-53)			(4 Card Only) (38-45)			(5 Card Only) (46-53)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)			
	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE				MAXIMUM	UNITS	
Whole Effluent Toxicity Testing	*****	*****	****	No	Discharge	*****	*****	*****	*****	*****	1 Year	Grab			
Daphnia pulex	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	Report				
SAMPLE MEASUREMENT															
PERMIT REQUIREMENT															
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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER												TELEPHONE		DATE	
Sarah Vance												505 286-6026		15 05 04	
Env. Eng.												AREA CODE NUMBER		YEAR MO DAY	
TYPED OR PRINTED															
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT															
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)															

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
 NAME GCC Rio Grande, Inc.
 ADDRESS P.O. Box 100
 Tijeras, NM 87059

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 (17-19)
 TX1Y
 DISCHARGE NUMBER

Form Approved.
 OMB No. 2040-0004
 Approval expires 05-31-98

FACILITY LOCATION
 11783 Hwy 337 South
 Tijeras, NM 87059

MONITORING PERIOD
 YEAR MO DAY YEAR MO DAY
 FROM 13 12 01 TO 14 11 30
 (20-21) (22-23) (24-25) (26-27) (28-29) (30-31)

Check here if No Discharge

NOTE: Read Instructions before completing this form

PARAMETER (32-37)	(3 Card Only) (46-53)			(4 Card Only) (38-45)			QUALITY OR CONCENTRATION (54-61)			NO. EX (82-83)	FREQUENCY OF ANALYSIS (84-88)	SAMPLE TYPE (89-90)				
	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS									
Whole Effluent Toxicity Testing Daphnia pulex	SAMPLE MEASUREMENT	*****	****	Analysis	Not	Conducted				1	Year	Grab				
	PERMIT REQUIREMENT	*****	*****	*****	*****	Report										
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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER												TELEPHONE	DATE			
Sarah Vance												505	286-6026	15	05	04
Env. Eng.												AREA CODE	NUMBER	YEAR	MO	DAY
TYPED OR PRINTED												SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT				
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)																

PERMITTEE NAME/ADDRESS (Include Facility Name & Location if Different)
 NAME GCC Rio Grande, Inc.
 ADDRESS P.O. Box 100
 Tijeras, NM 87059

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 DISCHARGE MONITORING REPORT (DMR)
 (2-19)

PERMIT NUMBER
 NM0000116
 DISCHARGE NUMBER
 TX4Y

Form Approved
 OMB No. 2040-0004
 Approval expires 05-31-98

FACILITY LOCATION
 11783 Hwy 337 South
 Tijeras, NM 87059

MONITORING PERIOD
 FROM YEAR MO DAY TO YEAR MO DAY
 12 12 01 TO 13 11 30
 (20-21) (22-23) (24-25) (26-27) (28-29) (30-31)

Check here if No Discharge
 NOTE: Read Instructions before completing this form

PARAMETER (32-37)	(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUANTITY OR CONCENTRATION (46-53)			NO. EX. (52-53)	FREQUENCY OF ANALYSIS (54-58)	SAMPLE TYPE (59-70)		
	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				UNITS	
Whole Effluent Toxicity Testing Daphnia pulex	*****	*****	****	No	Discharge	*****		1	Grab		
	*****	*****	****	*****	*****	Report		Year			
SAMPLE MEASUREMENT											
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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Sarah Vance Env. Eng. TYPED OR PRINTED											
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT <i>Sarah Vance</i>											
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)							TELEPHONE 505 286-6026			DATE 15 05 04	
							AREA CODE NUMBER		YEAR MO DAY		

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

