



SUSANA MARTINEZ  
Governor  
JOHN A. SANCHEZ  
Lieutenant Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
www.nmenv.state.nm.us



RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

**Certified Mail – Return Receipt Requested**

April 10, 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; MSGP; SIC 3241; NPDES Compliance Evaluation Inspection; NMR05GD23; 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](mailto:erin.trujillo@state.nm.us).

**GCC Rio Grande, Inc. / Tijeras Plant / NMR05GD23**  
**April 10, 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  
Darlene Whittten-Hill, USEPA (6EN) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN-WC) 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	R	0	5	G	D	2	3	11	12	1	5	0	3	1	8	17	18	~	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		73 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 September 29, 2008
	Exit Time/Date ~ 1555 hours / 3/18/2015 ~ 1125 hours / 3/19/2015	Permit Expiration Date September 29, 2013 (administratively continued)
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 -Ed Mummey, Quarry Manager, 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 <b>Entrance</b> Latitude: 35.071729° Longitude: -106.388775°  SIC 3241 Cement, Hydraulic (Primary), SIC 1499 Mining (Co-located)	
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)

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

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

An Industrial Stormwater Multi-Sector General Permit (MSGP) Compliance Evaluation Inspection (CEI) was conducted on January 5, 2010 at the above-described facility. The facility's Stormwater Pollution Prevention Plan (SWPPP) Revision Date 01/12/2010 had been reviewed in the previous CEI report (attached). Plant site map did not include all requirements of the 2008 MSGP. During this CEI, requested documentation for quarterly visual assessment and confirmation that annual reports were submitted to USEPA per requirements in the 2008 MSGP was not provided (not available) from on-site permittee representatives. See attached report and further explanations.

Name(s) and Signature(s) of Inspector(s) <b>Erin S. Trujillo /s/Erin S. Trujillo</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB/505-827-0418</b>	Date <b>04/10/2015</b>
Signature of Management QA Reviewer <b>Sarah Holcomb /s/Sarah Holcomb</b>	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB/505-827-2798</b>	Date <b>04/10/2015</b>

**GCC Rio Grande, Inc. - Tijeras Plant  
Compliance Evaluation Inspection  
NPDES Tracking No. NMR05GD23  
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 (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. The purpose of this inspection was to document the operator's status regarding stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26 and National Pollutant Discharge Elimination System (NPDES) U.S. Environmental Protection Agency (USEPA) industrial stormwater Multi-Sector General Permit (MSGP).

Co-mingled process water and stormwater discharges at Outfall 001 and future Outfall 004 are authorized under an Individual Permit No. NM0000116. GCC Rio Grande, Inc. obtained coverage on February 4, 2009, under the MSGP for industrial activities and is assigned permit tracking number NMR05GD23 under the expired administratively continued 2008 MSGP.

Stormwater discharges to the east, including the main entrance, would be to unclassified Cedro 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. 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. 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 NPDES and MSGP. This report is based on review of USEPA's on-line notice of intent (eNOI) database, files maintained by the permittee and NMED, on-site observation by NMED personnel, and verbal information provided by the permittee's representatives.

## **Status of the MSGP**

More information on USEPA MSGP and status of the proposed permit is available at:

[http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2008\\_finalpermit.pdf](http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2008_finalpermit.pdf)

It is anticipated that the next MSGP permit will also have NOI submittal deadlines. A sign up to receive the Federal Register Table of Content Notices announcing the availability of the Final MSGP Permit is available at:

<http://www.gpo.gov/fdsys/browse/collection.action?collectionCode=FR>

## **Permit Requirements**

Part 4.2 (Quarterly Visual Assessment of Stormwater Discharges) and 4.2.2 of the 2008 MSGP states:

*Once each quarter for the entire permit term, you must collect a stormwater sample from each outfall (except as noted in Part 4.2.3) and conduct a visual assessment of each of these samples.*

*You must document the results of your visual assessments and maintain this documentation onsite with your SWPPP as required in Part 5.4. You are not required to submit your visual assessment findings to EPA, unless specifically requested to do so. At a minimum, your documentation of the visual assessment must include:*

- *Sample location(s)*
- *Sample collection date and time, and visual assessment date and time for each sample;*
- *Personnel collecting the sample and performing visual assessment, and their signatures;*
- *Nature of the discharge (i.e., runoff or snowmelt);*
- *Results of observations of the stormwater discharge;*
- *Probable sources of any observed stormwater contamination,*
- *If applicable, why it was not possible to take samples within the first 30 minutes.*

Part 4.3.1 (Comprehensive Site Inspection Procedures) of the 2008 MSGP states:

*You must conduct annual comprehensive site inspections while you are covered under this permit. Annual, as defined in this Part, means once during each of the following inspection periods beginning with the period you are authorized to discharge under this permit:*

*Year 1: September 29, 2008 – September 29, 2009*

*Year 2: September 29, 2009 – September 29, 2010*

*Year 3: September 29, 2010 – September 29, 2011*

*Year 4: September 29, 2011 – September 29, 2012*

*Year 5: September 29, 2012 – September 29, 2013*

Parts 4.3.2 (Comprehensive Site Inspection Documentation) of the 2008 MSGP states:

*You must document the findings of each comprehensive site inspection and maintain this documentation onsite with your SWPPP as required in Part 5.4. In addition, you must submit this documentation in an annual report as required in Part 7.2. At a minimum, your documentation of the comprehensive site inspection must include (see the Annual Reporting Form included as Appendix I)....*

Part 7.2 (Annual Report) of the 2008 MSGP states:

*You must submit an annual report to EPA that includes the findings from your Part 4.3 comprehensive site inspection and any corrective action documentation as required in Part 3.4. If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s). In addition to the information required in Parts 3.4 (Corrective Action Report) and 4.3.2 (Comprehensive Site Inspection Documentation), you must include the following information with your annual report:*

*Facility name  
NPDES permit tracking number  
Facility physical address  
Contact person name, title, and phone number*

*EPA strongly recommends that you submit this report using the Annual Reporting Form provided as Appendix I. You must submit the annual report to EPA within 45 days (postmark date) after conducting the comprehensive site inspection to the address identified in Part 7.6.1.*

Part 7.5 Recordkeeping of the 2008 MSGP states:

*You must retain copies of your SWPPP (including any modifications made during the term of this permit), additional documentation requirements pursuant to Part 5.4 (including documentation related to corrective actions taken pursuant to Part 3), all reports and certifications required by this permit, monitoring data, and records of all data used to complete the NOI to be covered by this permit, for a period of at least 3 years from the date that your coverage under this permit expires or is terminated.*

### **Findings**

- A MSGP CEI was conducted on January 5, 2010 at the above-described facility. CEI Report and Findings are attached. The facility's Stormwater Pollution Prevention Plan (SWPPP) Revision Date 01/12/2010 had been reviewed in the previous CEI report. Except for the addition of a plant site map provided by the on-site permittee representatives during this CEI, the SWPPP and larger site map had not been updated to address findings of the previous report.
- The plant site map (attached) did not include the following from Part 5.1.2 Site Description, SWPPP, Site Map of the 2008 Permit:
  - directions of stormwater flow (use arrows) north of the coal silo and PNM substation, including the access road from northwest of the PNM Station toward #1 Well House (see Photos #1, 2 and 3).
  - locations of all stormwater conveyances along the north fence and possibly along the access road from northwest of the PNM Station toward #1 Well House. These conveyances may be additional stormwater monitoring points/outfalls.
- Requested documentation for Quarterly Visual Assessment with the requirements in Part 4.2 of the 2008 MSGP was not provided (not available) from on-site permittee representatives during this CEI.

Notes: It is not documented on the facility's Quarterly Visual Examination recordkeeping starting 4<sup>th</sup> Quarter 2006 and ending 1<sup>st</sup> Quarter 2010 that the information included visual assessment of discharges at Outfalls 002 and 003 in the northeast corner of the facility. Recordkeeping after 1<sup>st</sup> Quarter 2010 was not provided (not available) during this CEI.

- Requested documentation that annual reports for and after Year 3 (September 29, 2010 – September 29, 2011) were submitted to USEPA per Part 7.2 to the address identified in Part 7.6.1 of the 2008 MSGP was not provided (not available) from on-site permittee representatives during this CEI.

Notes: Annual reports with incorrect NPDES tracking number were prepared for inspection dates 09/29/2010 (report dated 09/30/2010), 09/21/2011 (report dated 09/11/2012), and 09/05/2013 (reported dated May 10, 2013) by a former employee, but not signed. Appendix B, Part 11(Signatory Requirements) of the 2008 MSGP states “...all reports submitted to EPA, must be signed by a person described in Appendix B, Subsection 11.A above or by a duly authorized representative of that person.” It is not documented or stated if the prepared/unsigned annual reports included discharges at Outfalls 002 and 003.

<b>NMED/SWQB            Official Photograph Log            Photo # 1</b>		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1220 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant / NPDES Tracking No. NMR05GD23		
Subject: Looking generally west-northwest, arrow points to channel (conveyance) starting at north facility fence.		

Example of dark soils along north facility fence



<b>NMED/SWQB            Official Photograph Log            Photo # 2</b>		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1221 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant / NPDES Tracking No. NMR05GD23		
Subject: Example of darker soils (similar to observed coal dust or solids) near PNM substation along (both within and outside) the north facility fence.		



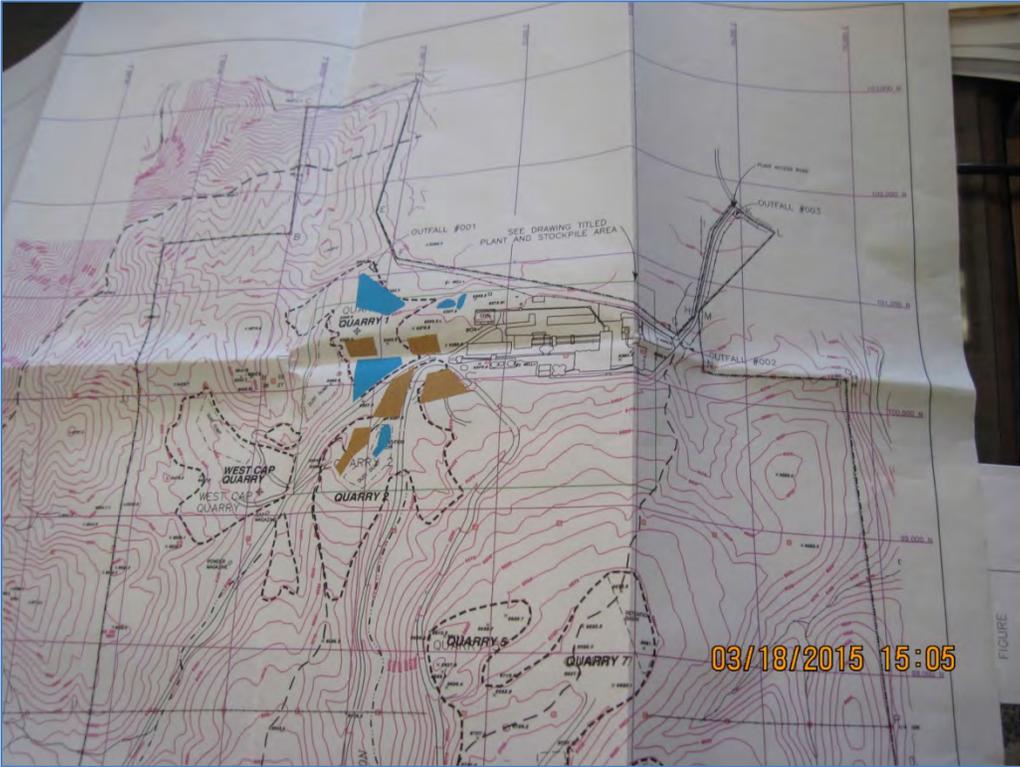
<b>NMED/SWQB            Official Photograph Log            Photo # 3</b>		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1224 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant / NPDES Tracking No. NMR05GD23		
Subject: Access road north and west of PNM substation.		



<b>NMED/SWQB            Official Photograph Log            Photo # 4</b>		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1444 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant / NPDES Tracking No. NMR05GD23		
Subject: Location of outlet of culvert inlet Outfall 002 that is outside the facility fence. This photo is provided to compare with Photo #7 in previous 2010 CEI report when it had recently snowed.		



<b>NMED/SWQB</b> <b>Official Photograph Log</b> <b>Photo # 5</b>		
Photographer: Erin S. Trujillo	Date: 03/18/2015	Time: 1505 hours
City/County: Tijeras / Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. / Tijeras Plant / NPDES Tracking No. NMR05GD23		
Subject: Larger map provided by on-site permittee representatives during this CEI has additional information than the map available during previous 2010 CEI (e.g., notation to see drawing titled plant and stockpile area).		



**Attachment to March 18 & 19, 2015 CEI Report NMR05GD23**

**Previous NPDES January 5, 2010 CEI Report**



BILL RICHARDSON  
Governor  
DIANE DENISH  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

Harold Runnels Building, N2050  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
www.nmenv.state.nm.us



RON CURRY  
Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

January 27, 2010

David Saegart, Plant Manager  
GCC Rio Grande, Inc.  
P.O. Box 100  
Tijeras, New Mexico 87059

**RE: Compliance Evaluation Inspection, Industrial Stormwater Multi-Sector General Permit, GCC Rio Grande, Inc. – Tijeras Plant (NPDES Tracking Number #NMR05GD23), January 5, 2010**

Dear Mr. Saegart,

Enclosed, please find a copy of the report 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.

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 to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

<p>Diana McDonald U.S. Environmental Protection Agency Region VI Enforcement Branch (6EN-WM) 1445 Ross Avenue Dallas, Texas 75202-2733</p>	<p>Program Manager New Mexico Environment Department Surface Water Quality Bureau Point Source Regulation Section P.O. Box 5469, Santa Fe, New Mexico 87502</p>
--	---

I appreciate the cooperation of José E. Madera, Environmental Specialist, GCC Rio Grande, Inc. during the inspection. If you have any questions about this inspection report, please contact me at (505) 827-0418.

Sincerely,

Erin S. Trujillo  
Surface Water Quality Bureau

- cc: Marcia Gail Bohling, USEPA (6EN-AS) by e-mail  
Stacey Bennett-Dwyer, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Diana McDonald, USEPA (6EN-WM) by e-mail  
Jennifer Ickes, NMED District I Manager by e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### 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	R	0	5	G	D	2	3	11	12	1	0	0	1	0	5	17	18	-	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					69	70	2	71	N	72	N	73		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 SOUTH HWY 337, TIJERAS, NM 87059. FROM I-40, TAKE EXIT 175 TO TIJERAS & NM 333 (OLD RTE 66). TRAVEL SOUTH ON NM 337 APPROXIMATELY ¼ MILE TO ENTRANCE ON THE RIGHT. BERNALILLO COUNTY		Entry Time /Date <b>0911 hours / 01/05/2010</b>	Permit Effective Date September 29, 2008
		Exit Time/Date <b>1743 hours / 01/05/2010</b>	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) JOSÉ E. MADERA/ENVIRONMENTAL SPECIALIST/505-286-6026 OR 516-9769 AND FAX 505-281-9126 DAVID SAEGART/PLANT MANAGER		Other Facility Data <b>Facility Private Entrance</b> Lat N 35.071729° Long W -106.388775° <b>SIC 3241 (Primary)</b>	
Name, Address of Responsible Official/Title/Phone and Fax Number DAVID SAEGART/GCC RIO GRANDE, INC., P.O. BOX 100, TIJERAS, NEW MEXICO 87059-0100/ PLANT MANAGER/505-286-6038 OR 362-4593 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	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

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

1. OWNER/OPERATOR APPLIED FOR REQUIRED NPDES PERMIT COVERAGE; UPDATED, BUT DID NOT COMPLETE (SIGN/CERTIFY) A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) PRIOR TO SUBMITTING A NOTICE OF INTENT (NOI).
2. SEE ATTACHED FURTHER EXPLANATIONS AND PHOTO LOG.

Name(s) and Signature(s) of Inspector(s) <b>Erin S. Trujillo</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB/505-827-0418</b>	Date <b>01/27/2010</b>
Signature of Management QA Reviewer <b>Richard E. Powell</b>	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB/505-827-2798</b>	Date <b>01/27/2010</b>

**NPDES Industrial Stormwater (Multi-Sector General Permit)  
GCC Rio Grande, Inc.-Tijeras Plant (NPDES tracking #NMR05GD23)  
January 5, 2010**

**Further Explanations**

**Introduction**

On January 5, 2010, a Compliance Evaluation Inspection was conducted at the GCC Rio Grande, Inc.-Tijeras Plant (GCC), a cement manufacturing plant and quarry, located at 11783 State Highway 337, Tijeras, New Mexico by Erin S. Trujillo accompanied by Daniel Valenta, both of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the facility's status regarding the National Pollution Discharge Elimination System (NPDES) permit requirements for "stormwater discharges associated with industrial activity" under 40 Code of Federal Regulations (CFR) 122.26(b)(14) and the industrial stormwater Multi-Sector General Permit (MSGP).

Stormwater discharges to tributaries, thence to Tijeras Canyon, thence to a classified reach of the Rio Grande in Segment 20.6.4.105 of the Rio Grande Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters 20.6.4 New Mexico Administrative Code (NMAC)*). GCC was previously covered under the 2000 MSGP (NPDES tracking #NMR05A890). The Permittee submitted a notice of intent (NOI) to obtain permit coverage under the 2008 MSGP on January 5, 2009 (NPDES tracking #NMR05GD23).

The NMED performs a certain number of CEI's for the 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 is also authorized under NPDES Permit #NM0000116 to discharge to Outfall 001 thence to Corral Canyon, a tributary of Tijeras Canyon. This report addresses compliance with the MSGP and not discharges authorized to Outfall 001 under GCC's individual NPDES permit.

Upon arrival at approximately 0911 hours on January 5, 2010, José E. Madera, Environmental Specialist and David Saegart, Tijeras Plant Manager of GCC were contacted and an entrance interview was conducted. Ms. Trujillo made introductions, presented credentials and discussed the purpose of the inspection. Mr. Madera and the inspectors toured the plant and quarry areas. Observations were limited by snow cover in some areas and at the southwest quarry area due to active mining operations. Following the inspection, an exit interview to discuss preliminary findings was conducted from approximately 1645 to 1720 hours with Mr. Madera and Mr. Saegart at the plant offices. The inspectors left the facility at approximately 1743 hours on January 5, 2010. Following the inspection, the Permittee's on-site representative submitted a copy of the facility's Storm Water Pollution Prevention Plan (SWPPP) and Annual Comprehensive Site Inspection report to NMED SWQB for consideration in this report.

**Facility Description**

Industrial activities at the GCC meet the descriptions in both Sector E - Glass, Clay, Cement, Concrete, and Gypsum Product Facilities (Standard Industrial Code or SIC 3241) and Sector J - Non-Metallic Mineral Mining and Dressing Activities (SIC 1499) of the 2008 MSGP. Drainage along the northern property boundary and unpaved access road to water well #1 is not toward Quarry #1 Pond and Outfall 001, but is contained by earth berms. East of the cement silo storage and truck scale house, drainage of the paved areas is to the southeast toward a ditch open to culvert inlet Outfall 002 with an outlet outside the facility fence (Photos 1, 3, 4 and 7). Stormwater of the mining claim area south of the plant would also flow toward culvert inlet identified as Outfall 002. Along the entrance paved access road, drainage is to two culverts at identified as Outfall 003 that cross east under NM 377 (Photos 1 and 5). North of the facility

entrance, drainage would be north toward ditches along NM 377 (Photo 6). Based on information from the permittee's on-site representative and review of available topography and aerial photography maps, exploration to determine the financial viability of a site and land disturbance activities have occurred through out the facility's mining claim area. Unpaved roads are shown on USGS topography maps and on the facility wall maps in areas labeled D and M (Photo 1). Topography shown on the facility wall map indicate that drainage from portions of area D is toward the culvert inlet Outfall 002. Also, drainage from portions of area D and M is toward two unnamed intermittent streams that both flow to the eastern property boundary of the facility and offsite.

### **Permit - Overall Rating of "M" or Marginal**

Permittee did not complete (certify, sign and date) a SWPPP prior to the NOI submission (Part 5, Part 5.1.7 and Appendix B, Subsection 11A, 11.B and 11.E of the 2008 MSGP). GCC's SWPPP was prepared on December 29, 2008; but not certified, signed and dated until after the inspection on January 12, 2010.

### **Records/Reports – Overall Rating of "U" or Unsatisfactory**

#### **General Documentation (Part 5 of the 2008 MSGP)**

Permittee did not retain a copy of the SWPPP required by this permit at the facility and the document was not immediately available during the inspection (Part 5.3 SWPPP Availability). As stated in Appendix B.9 (Inspection and Entry) of the 2008 MSGP, the Permittee must allow EPA or an authorized representative to, "*have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.*" GCC has an environmental management system for electronic documents available to staff, but based on information from the permittee's on-site representatives, the electronic system or database was not updated with the current SWPPP on the day of the inspection.

Permittee did not keep with the SWPPP documentation to support eligibility under the Endangered Species Act (Part 5.1.6 of the 2008 MSGP). The Permittee certified eligibility for coverage on the NOI under Criterion A. The SWPPP states, "*No federally-listed threatened or endangered species or their designated critical habitat are likely to occur in the action area.*" There was no additional documentation including the process employed and results of the endangered species investigation to support eligibility (Appendix E Procedures Relating to Endangered Species Protection of the 2008 MSGP).

Permittee also did not keep with the SWPPP the following additional documentation intended to document implementation required by the permit (Part 5.4 of the 2008 MSGP):

- Copy of the NOI submitted to EPA;
- EPA acknowledgement letter;
- EPA monitoring and reporting requirement letter;
- Records of employee training, including date training received;
- All inspection reports, including the Routine Facility Inspection Reports, the Quarterly Visual Assessment Reports, and the Comprehensive Site Inspection Reports; and
- Description of any deviations from the schedule for visual assessments, and the reason for the deviations.

Notes: GCC's SWPPP contained an incomplete copy of the NOI. Routine Facility Inspection Reports (labeled Quarterly Storm Water Inspection Reports) were available at the facility from the permittee's on-site representative on the day of this inspection, but were not kept with the SWPPP.

## Site Description (Part 5.1.2 of the 2008 MSGP)

### *General Location Map*

Permittee's SWPPP general location map did not provide enough detail to identify the location of the facility and all receiving waters for storm water discharges.

### *Site Map*

Permittee's SWPPP site map and drainage map did not include all required applicable items for the portions of the facility and industrial activities covered under the 2008 MSGP. The following were missing from the SWPPP site map and/or drainage map for areas covered under the 2008 MSGP:

- size of the property in acres;
- location and extent of all impervious surfaces;
- directions of storm water flow (indicated by arrows);
- locations of all existing structural control measures;
- locations of all receiving waters in the immediate vicinity of the facility;
- locations of all storm water conveyances including ditches, pipes and swales;
- locations of all potential pollutants and significant materials;
- locations of storm water inlets and outfalls, with a unique identification for each outfall and if substantially identical;
- locations and descriptions of all non-storm water discharges; and
- locations of access roads.

Notes: GCC's facility wall maps included topography, Outfall 002, Outfall 003, and the entrance travelled by carriers of raw materials, manufactured products, and waste materials used or created by the facility. However, detailed plant drawings, including storm water flow indicated with arrows, did not include all areas east of the cement silos or entrance. These additional maps also did not delineate areas of industrial activities with discharges covered under the facility's individual permit separately from the MSGP.

## Potential Pollutant Sources (Part 5.1.3 of the 2008 MSGP)

Permittee's SWPPP did not document (otherwise clearly identify) those areas at the facility where industrial materials or activities are exposed to stormwater and from which allowable non-stormwater discharges are released that are covered by the 2008 MSGP. GCC prepared a comprehensive SWPPP that primarily discussed pollution prevention for discharges covered under the facility's individual permit. Stormwater discharges associated with industrial activity that are currently covered under GCC's individual NPDES permit are not eligible for coverage under the MSGP (Part 1.1.4.3 of the 2008 MSGP). Stormwater discharges that are mixed with non-stormwater, other than those non-stormwater discharges listed in Part 1.1.3, are also not eligible for coverage (Part 1.1.4.1) under the 2008 MSGP.

The facility may also have co-located industrial activities not documented in the SWPPP. The 2008 MSGP now enables operators to include coverage for construction and exploration activities associated with mining. Additional requirements in Part 8.J.6 of the 2008 MSGP are applicable for sites undergoing exploration and construction, active mineral mining facilities, temporarily inactive mineral mining facilities, and sites undergoing reclamation. GCC's SWPPP did not include potential pollutant sources from possible exploration activities and/or land disturbance in area D or M.

Description of Control Measures, and Schedules and Procedures (Parts 5.1.4 and 5.1.5 of the 2008 MSGP)

Permittee's SWPPP did not include a schedule for regular pickup and disposal of waste materials and/or cleanup times. Salt storage did not occur at this facility, but deicers and aggregate are used during inclement weather at the entrance paved access road according to the permittee's on-site representative. Schedules for street sweeping and/or accumulated aggregate removal from the entrance access road was not documented in the SWPPP.

Control measures for areas not covered under GCC's individual permit also need to be documented in the SWPPP. For example, earth berms along the northern property boundary and unpaved access road to water well #1 to control runoff were not discussed. Any control measures (e.g., erosion and sediment controls, stabilization, flow velocity dissipation, etc.) for possible exploration in area D and M would also need to be documented. No mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining (Part 8.J.9) or runoff from material storage piles at cement manufacturing facilities (Part 8.E.5) was observed toward outfalls covered under the 2008 MSGP. But, GCC's SWPPP did not discuss specific control measures, schedules or procedures on dewatering and/or material storage piles with drainage to outfalls covered under the 2008 MSGP to ensure that the facility would not be subject to sector-specific numeric effluent limitations.

Inspections and Assessments (Part 4 and 5.1.5.2 of the 2008 MSGP)

*Routine Facility Inspections (Part 4.1 of the 2008 MSGP)*

Permittee's Routine Facility Inspections Reports (GCC's Quarterly Storm Water Inspection Reports from 1<sup>st</sup> Quarter of 2009 to 4<sup>th</sup> Quarter 2009) did not document inspection of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures covered under the 2008 MSGP (i.e., areas that would discharge to outfalls other than Outfall 001).

Permittee's Routine Facility Inspections Reports also did not include: time of inspection; signature of inspector; and weather information and a description of discharge occurring at the time of the inspection. GCC's SWPPP and inspection reports did not provide sufficient documentation to determine that "at least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is occurring."

*Quarterly Visual Assessments (Part 4.2 of the 2008 MSGP)*

Permittee did not document that Quarterly Visual Assessments (collect a stormwater sample from each outfall and conduct a visual assessment) had been conducted. Recorded precipitation events in the surrounding area based on a review of readily available weather information at <http://www.wunderground.com> for a site in Cedar Crest, New Mexico approximately 2.5 miles north of the facility, indicated the following precipitation sums over ½ inches between January 1 and December 31, 2009:

Date	Precipitation Sum in Inches
07/21/2009	0.88
08/31/2009	0.53
09/03/2009	0.89
09/16/2009	0.57
10/20/2009	0.94

GCC's SWPPP and inspection reports did not include documentation of exceptions to Quarterly Visual Assessments, for example, climates with irregular stormwater runoff or areas subject to snow. It was also not documented in GCC's SWPPP or inspection reports, if discharges from precipitation events in the area occurred at the facility.

*Comprehensive Site Inspection (Part 4.3 of the 2008 MSGP)*

Permittee's comprehensive site inspection report did not document or include: title(s) of the personnel making the inspection; and a statement, signed and certified in accordance with Appendix B, Subsection 11 of the permit. Signature delegation authorization in Appendix E of GCC's SWPPP dated January 12, 2010 is for the facility's individual permit and does not specify the 2008 MSGP (i.e., NPDES Tracking Number #NMR05GD23).

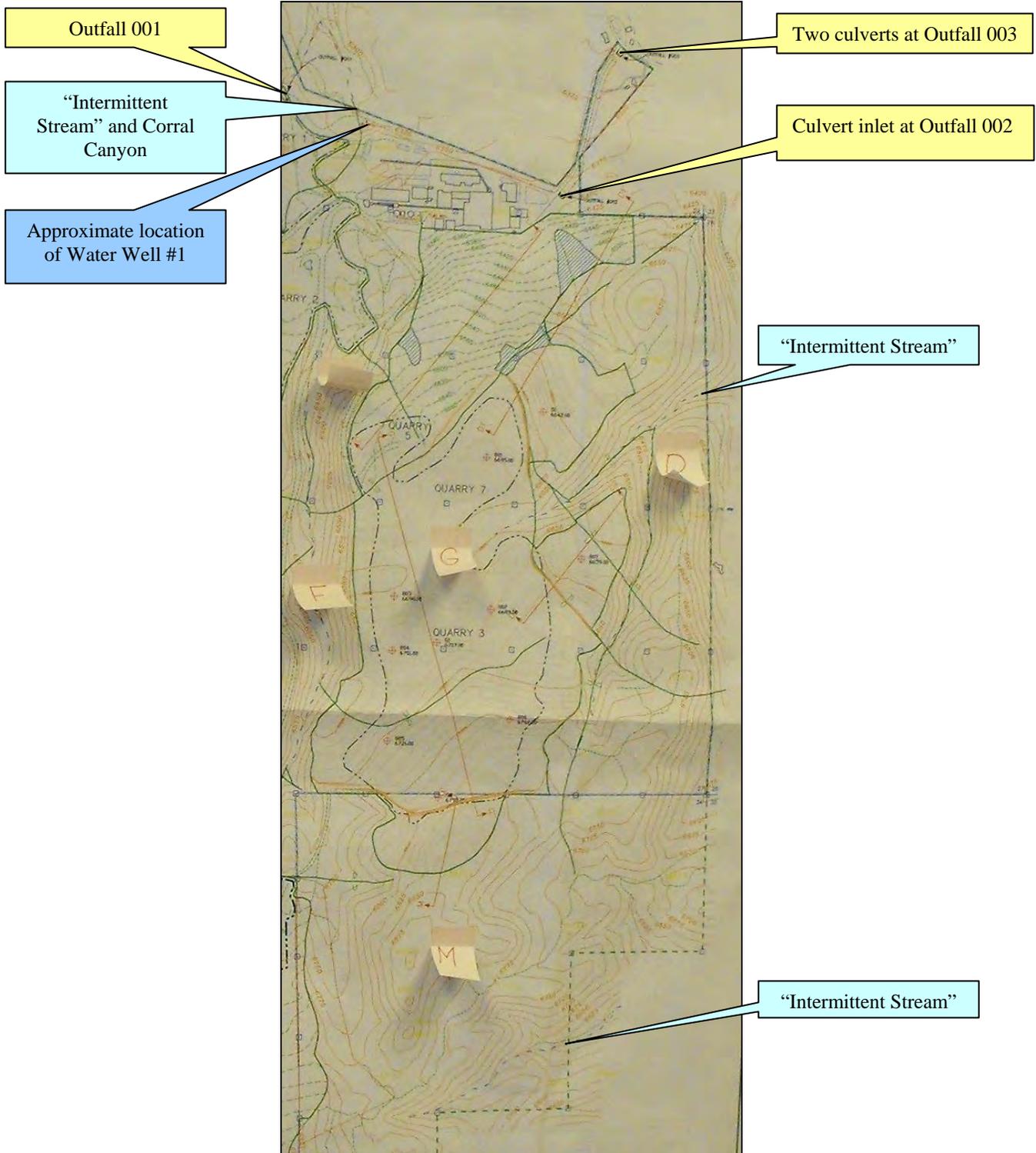
Permittee's Non-Stormwater Discharge evaluation documentation in the SWPPP needs to be updated. Also, evidence of, or the potential for, pollutants entering the drainage system is to be documented in the next Comprehensive Site Inspection. GCC's SWPPP documents a dry-weather non-stormwater discharge evaluation on February 13, 1998 that includes Outfall 002 and Outfall 003. Surface drainage north to drainage ditches along NM 377 was not discussed. It was not determined during this inspection if the dewatering of the truck scales at the cement storage silos was collected stormwater or snow melt runoff; uncontaminated ground water or spring water; foundation or footing drainage; or combination (Photo 2). There is potential that the dewatering may or could contain process waters. Flow from the dewatering is toward a ditch along the south side of the plant that is open to Outfall 002. Any outfalls associated with co-located activities, for example Sector J exploration, would also need to be evaluated. Non-stormwater discharges are not authorized by an NPDES permit must be eliminated (Part 1.1.3 for a list of allowable non-stormwater discharges authorized by this permit and Part 2.1.2.10 Non-Stormwater Discharges).

*Annual Report (Part 7.2 of the 2008 MSGP)*

Permittee did not submit the first year annual report to EPA within 45 days (postmark date) after conducting a comprehensive site inspection on September 29, 2009. A copy of the annual report submitted to EPA in a letter dated January 25, 2010 did not document inspection of areas covered under the 2008 MSGP and instead refers to GCC's individual permit. The annual report did not include the following required items: NPDES permit tracking number and facility physical address. EPA strongly recommends permittees submit this report using the Annual Reporting Form provided as Appendix I of the 2008 MSGP.

**NMED/SWQB  
Official Photograph Log  
Photo # 1**

Photographer: Daniel Valenta	Date: 01/05/2010	Time: 0936 hours
City/County: Tijeras/Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. – Tijeras Plant		
Subject: Portion of facility wall map (GCC's Design Limits of Quarry Units dated 11/29/95) showing outfalls and intermittent streams. The original photo has been cropped for this report.		



**NMED/SWQB  
Official Photograph Log  
Photo # 2**

Photographer: Erin Trujillo	Date: 01/05/2010	Time: 1221 hours
City/County: Tijeras/Bernalillo County	State: New Mexico	
Location: GCC Rio Grande, Inc. – Tijeras Plant		
Subject: Arrow points to pipe that is used to dewater cement storage silos/truck scale house outside onto paved area.		



**NMED/SWQB  
Official Photograph Log  
Photo # 3**

Photographer: Erin Trujillo	Date: 01/05/2010	Time: 1223 hours
City/County: Tijeras/Bernalillo County	State: New Mexico	
Location: GCC Rio Grande, Inc. – Tijeras Plant		
Subject: Location of culvert inlet Outfall 002		



**NMED/SWQB  
Official Photograph Log  
Photo # 4**

Photographer: Erin Trujillo	Date: 01/05/2010	Time: 1227 hours
City/County: Tijeras/Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. – Tijeras Plant		
Subject: Ditch south of plant that is open to Outfall 002		



**NMED/SWQB  
Official Photograph Log  
Photo # 5**

Photographer: Erin Trujillo	Date: 01/05/2010	Time: 1331 hours
City/County: Tijeras/Bernalillo County		State: New Mexico
Location: GCC Rio Grande, Inc. – Tijeras Plant		
Subject: Two culverts crossing NM 377 at Outfall 003 south of entrance		



**NMED/SWQB  
Official Photograph Log  
Photo # 6**

Photographer: Erin Trujillo	Date: 01/05/2010	Time: 1333 hours
City/County: Tijeras/Bernalillo County	State: New Mexico	
Location: GCC Rio Grande, Inc. – Tijeras Plant		
Subject: Area along NM 377 north of entrance		



**NMED/SWQB  
Official Photograph Log  
Photo # 7**

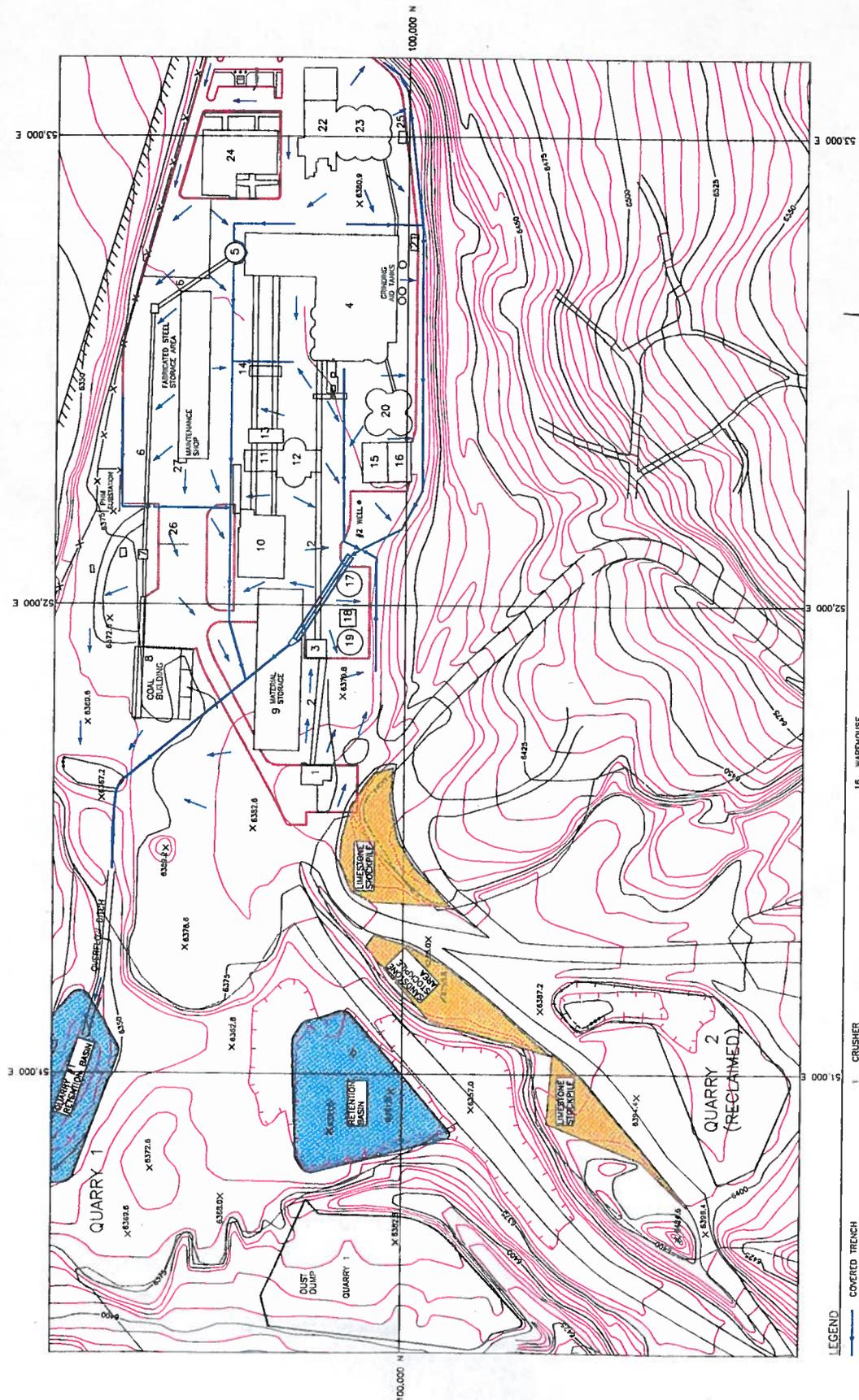
Photographer: Erin Trujillo	Date: 01/05/2010	Time: 1335 hours
City/County: Tijeras/Bernalillo County	State: New Mexico	
Location: GCC Rio Grande, Inc. – Tijeras Plant		
Subject: Location of outlet of culvert inlet Outfall 002 that is outside the facility fence		



**Attachment to March 18 & 19, 2015 CEI Report NMR05GD23**

**GCC Rio Grande, Inc. Plant Site Map**

3/18/11



- LEGEND**
- COVERED TRENCH
  - PAVED WATERWAY
  - UNDERGROUND PIPE
  - UNPAVED TRENCH
  - DIRECTION OF SURFACE RUNOFF
  - STOCKPILE
  - QUARRIED LIMT
  - PAVEMENT EDGE
  - DUST DUMP
  - RETENSION BASIN
- 1 CRUSHER
  - 2 CONVEYORS - 30' BELTS
  - 3 SCREEN BUILDING
  - 4 MILL BUILDING
  - 5 COAL SILO - 39' I.D., 850 TON CAP.
  - 6 CONVEYOR (COAL) - 24' BELT
  - 7 COAL STORAGE BLDG - APPROX. 150'x120', 3,000 TONS
  - 8 MATERIAL STORAGE BUILDING - 350'x100'
  - 9 KILN FEED BUILDING
  - 10 KILN FEED BUILDING
  - 11 BLENDING SILOS - FOUR 40' I.D.
  - 12 REHEATER BUILDING
  - 13 STORAGE BUILDING
  - 14 STORAGE BUILDING
  - 15 STORAGE BUILDING
  - 16 WAREHOUSE
  - 17 OIL TANK - 400,000 GAL., 50' DIAM. (EMPTY)
  - 18 WATER PUMP HOUSE
  - 19 CEMENT STORAGE SILOS - FOUR 40' I.D.
  - 20 CEMENT STORAGE SILOS - FOUR 40' I.D.
  - 21 COOLING TOWER
  - 22 COOLING TOWER
  - 23 OFFICE BUILDING AND CHANGE HOUSE
  - 24 OFFICE BUILDING AND CHANGE HOUSE
  - 25 BULK TRUCK WASH
  - 26 WASTE OIL
  - 27 WASTE OIL

**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](mailto: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