



September 6, 2023

Angela Lopez  
Environmental Health Manager, Permitting Division  
City of Albuquerque  
Environmental Health Department, Air Quality Program

GCC Rio Grande, Inc.  
Tijeras Portland Cement Manufacturing Facility  
11783 State Highway 337 South  
Tijeras, New Mexico

Subject: Air Quality Construction Permit Application #2197-M2 First Administrative Incomplete Determination

Dear Ms. Lopez

GCC Rio Grande, Inc. (GCC) owns and operates a Portland cement manufacturing facility located at 11783 State Highway 337 South, Tijeras, New Mexico, referred to as the Facility. On August 17, 2023 GCC received the attached Incomplete Determination. GCC's responses to the items are included below:

1. **Regarding Item #1 pertaining to PSD review pursuant to 20.11.61 NMAC:** Per 20.11.61.2 NMAC, the PSD regulations apply to any person constructing any new major stationary source or major modification, as defined in 20.11.61 NMAC. The kilns are an existing source of emissions and the proposed change in lb/hr emissions is not a physical change or change in the method of operation that would result in a significant emissions increase of a regulated NSR pollutant. The proposed modifications do not meet the definition of major modification as noted in 20.11.61.7.II NMAC. 20.11.61.27 NMAC outlines the significant emission rates (SERs), all of which are in units of tons/yr. The proposed updates to the kilns only result in changes to lb/hr emissions and so, there are no changes to ton/yr emissions associated with the revision which would necessitate a comparison to SERs. As such, we do not believe a PSD review subject to 20.11.61 NMAC is warranted.
2. **Regarding Item #2 pertaining to the O&M Plan for the Clinker Coolers:** The proposed revision only affects lb/hr emissions of the kilns, and there are no proposed changes or updates to the clinker coolers. Only Section 5.0 of the O&M plan is specific to the kilns. As such, we do not believe that Section 6.0 of the O&M plan is relevant or required for an administrative completeness determination and was included for informational purposes only in the original application.

Please do not hesitate to reach out should you have any questions regarding the submittal. GCC remains committed to ensuring continued compliance with all applicable regulations and appreciates the continued partnership with the department.

Sincerely,

*Samantha Kretz*

Samantha Kretz  
Environmental Engineer  
GCC Tijeras

CC:

Ramses Maldonado, GCC  
Sarah Vance, GCC  
Vineet Masuraha, Trinity Consultants  
Mike Celente, Trinity Consultants

# CITY OF ALBUQUERQUE

*Environmental Health Department*

Angel Martinez, Jr., Director



August 17, 2023

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Arturo Chavez, [archavez@gcc.com](mailto:archavez@gcc.com);  
Michael Celente, Trinity Consultants; [mcelente@trinityconsultants.com](mailto:mcelente@trinityconsultants.com)

**SUBJECT: Air Quality Construction Permit Application #2197-M2  
First Administrative Incomplete Determination**

Dear Ms. Kretz:

The City of Albuquerque, Environmental Health Department (EHD), Air Quality Program (Program) received an air quality construction permit application from GCC Rio Grande, Inc. on July 12, 2023 for their Portland cement production facility located at GCC Rio Grande, Inc. Tijeras Plant, 11783 State Hwy 337, in Tijeras, New Mexico. An initial review has been completed, and based on the information that was submitted, the Program is not able to complete a thorough evaluation of the application at this time. Therefore, the application has been deemed administratively incomplete on August 12, 2023. The preliminary review revealed the following issues with the application that will need to be addressed before the review can proceed:

1. To permit an increase in the lb/hr rate for the kilns, as requested, a Prevention of Significant Deterioration (PSD) review pursuant to 20.11.61 NMAC is required; and,
2. Complete 6.1 of the Operation & Maintenance Plan for the Clinker Coolers.

Pursuant to 20.11.41.16.A.(2) NMAC, the EHD, Program may deem the application administratively incomplete, if the Program requires additional information to make a thorough review of the application, including technical clarifications, emission calculations, emission factor usage or additional application review fees if any are required by 20.11.2 NMAC.

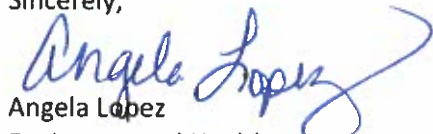
Please be aware that this is the first out of three opportunities for the Program to determine if the application is administratively complete and continue the process. If the Program has ruled an application administratively incomplete three times, the Program can deny the permit application. Any fees

submitted for processing an application that has been denied will not be refunded pursuant to 20.11.41.16.A(2) NMAC. If the Program denies the application, the applicant may submit a new application and the fee required for a new application. **The deadline to receive a complete application and a copy, that includes all the information as required in 20.11.41.13 NMAC, is September 22, 2023.** Additionally, if the time lapse between the date of the Memorandum with the contact list of all NAs/NCs provided by the Program and the resubmittal of the application is more than three months, you will need to resend the notice of intent (NOI) to construct to the representatives of the Neighborhood Associations and Coalitions (NAs/NCs) located within ½ mile of the boundaries of the site, Please contact the Program to obtain an updated contact list of the NAs/NCs.

The Program will continue the evaluation of the application, once a complete application has been received.

If you have any further questions, please do not hesitate to contact me by phone at (505) 768-1962 or at [angelalopez@cabq.gov](mailto:angelalopez@cabq.gov).

Sincerely,

A handwritten signature in blue ink that reads "Angela Lopez". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Angela Lopez  
Environmental Health Manager, Permitting Division  
Air Quality Program, Environmental Health Department  
City of Albuquerque