TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 22, 2023

VIA ELECTRONIC FILING

Ms. Laurie Gharis
Office of the Chief Clerk
Texas Commission on Environmental Quality
Post Office Box 13087, MC-105
Austin, Texas 78711-3087

Re: Executive Director's Backup Documents Filed for Consideration of Hearing Requests at Agenda for the Application by GCC Sun City Materials, LLC for TCEQ Permit No. WQ0004636000; TCEQ Docket No. 2023-0323-SLG

Dear Ms. Gharis:

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application. If you have any questions or comments, please call me at 512-239-0622 or email me at Aubrey.Pawelka@tceq.texas.gov.

- Technical Summary and ED's Preliminary Decision/ Draft Permit
- Compliance History Report

Thank you for your attention to this matter.

Sincerely,

Aubrey Pawelka

Aubrey Pawelka, *Staff Attorney*
Environmental Law Division

TECHNICAL SUMMARY AND EXECUTIVE DIRECTOR'S PRELIMINARY DECISION

DESCRIPTION OF APPLICATION

Applicant:	GCC Sun City Materials, LLC, Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0004636000, EPA I.D. No. TXL005012
Regulated Activity:	Wastewater Treatment Plant (WWTP) Sewage Sludge and Water Treatment Plant (WTP) Residuals Disposal via Monofill.
Type of Application:	Permit
Request:	Renewal
Authority:	Texas Water Code §26.027; 30 Texas Administrative Code (TAC) Chapters 281, 305, 312, and Texas Health and Safety Code (THSC) §361.121; and Commission policies.

EXECUTIVE DIRECTOR RECOMMENDATION

The Executive Director has made a preliminary decision that this permit, if issued, meets all statutory and regulatory requirements. The draft permit will expire at midnight five years from the date of issuance in accordance with 30 TAC §312.10 and THSC §361.121.

REASON FOR PROJECT PROPOSED

GCC Sun City Materials, LLC has applied to the Texas Commission on Environmental Quality (TCEQ or Commission) for a renewal of Permit No. WQ0004636000 to authorize the disposal of WWTP sewage sludge and WTP residuals.

PROJECT DESCRIPTION AND LOCATION

The disposal unit is located 3.3 miles east of the intersection of Gary Lee and Hueco Ranch Road, at the eastern end of Gary Lee Road, in Hudspeth County, Texas 79938.

The disposal unit is located within the drainage basin of the Rio Grande Below Riverside Diversion Dam in Segment No. 2307 of the Rio Grande Basin.

No discharge of pollutants into water in the State is authorized by this permit.

PROPOSED PERMIT CONDITIONS

Sludge Provisions are included in the draft permit according to the requirements of 30 TAC Chapter 312, Sludge Use, Disposal and Transportation. The draft permit authorizes the disposal of WWTP sewage sludge and WTP residuals at a maximum of 882 cubic yards per day on 142 acres of land used as a monofill with the estimated life of Monofill Area C being 4 years.

SUMMARY OF CHANGES FROM APPLICATION

Water Quality Assessment Team changes: None

SUMMARY OF CHANGES FROM EXISTING PERMIT

The draft permit includes all updates based on the 30 TAC 312 rule change effective April 23, 2020. These updates include, but are not limited to, changing "Water Treatment Plant Sludge" to "Water Treatment Plant Residuals" and "facility" to "disposal unit".

The location description of the disposal unit has been updated in the draft permit.

In order to describe the location of the monofill more accurately within the entire site, this description has been changed from the southwest corner to the northeast area of the 1,000 acre site.

The estimated life span of Monofill Area C has each been reduced to four years.

Special Provision C has been added in the draft permit. This provision requires submittal of a cancellation form if Monofill C has reached its estimated life span prior to the expiration date of the permit.

Monofill Area B has been removed as the estimated life span of this area has been exceeded and Monofill Area A has been removed because it is no longer in use.

Because Monofill Areas A and B are no longer being used, the acreage for disposal has been reduced.

BASIS FOR PROPOSED DRAFT PERMIT

The following items were considered in developing the proposed permit draft:

1. Application submitted with a letter dated April 9, 2021, and additional information submitted on October 29, 2021, January 14, 2022, February 25, 2022, March 25, 2022, and March 28, 2022.

2. Existing TCEQ permit no.: Permit No. WQ0004636000 issued on October 7, 2016.

3. Interoffice Memorandum from the Water Quality Assessment Team, Water Quality Division.

PROCEDURES FOR FINAL DECISION

When an application is declared administratively complete, the Chief Clerk sends a letter to the applicant advising the applicant to publish the Notice of Receipt of Application and Intent to Obtain Permit in the newspaper. In addition, the Chief Clerk instructs the applicant to place a copy of the application in a public place for review and copying in the county where the facility is or will be located. This application will be in a public place throughout the comment period. The Chief Clerk also mails this notice to any interested persons and, if required, to landowners identified in the permit application. This notice informs the public about the application, and provides that an interested person may file comments on the application or request a contested case hearing or a public meeting.

Once a draft permit is completed, it is sent, along with the Executive Director's preliminary decision, as contained in the technical summary or fact sheet, to the Chief Clerk. At that time, the Notice of Application and Preliminary Decision will be mailed to the same people and published in the same newspaper as the prior notice. This notice sets a deadline for making public comments. The applicant must place a copy of the Executive Director's preliminary decision and draft permit in the public place with the application.

Any interested person may request a public meeting on the application until the deadline for filing public comments. A public meeting is intended for the taking of public comment and is not a contested case proceeding.

After the public comment deadline, the Executive Director prepares a response to all significant public comments on the application or the draft permit raised during the public comment period. The Chief Clerk then mails the Executive Director's response to comments and final decision to people who have filed comments, requested a contested case hearing, or requested to be on the mailing list. This notice provides that if a person is not satisfied with the Executive Director's response and decision, they can request a contested case hearing or file a request to reconsider the Executive Director's decision within 30 days after the notice is mailed.

The Executive Director will issue the permit unless a written hearing request or request for reconsideration is filed within 30 days after the Executive Director's response to comments and final decision is mailed. If a hearing request or request for reconsideration is filed, the Executive Director will not issue the permit and will forward the application and request to the TCEQ Commissioners for their consideration at a scheduled Commission meeting. If a contested case hearing is held, it will be a legal proceeding similar to a civil trial in state district court.

If the Executive Director calls a public meeting or the Commission grants a contested case hearing as described above, the Commission will give notice of the date, time, and place of the meeting or hearing. If a hearing request or request for reconsideration is made, the Commission will consider all public comments in making its decision and shall either adopt the Executive Director's response to public comments or prepare its own response.

For additional information about this application, contact Kellie Crouch at (512) 239-2435.

Kellie Crouch — 14 April 2022

Kellie Crouch, Biosolids Coordinator
Land Application Team
Water Quality Assessment Section (MC 150)

Date

PERMIT NO. WQ0004636000
[For TCEQ Office Use Only: EPA ID No. TXL005012]

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
P.O. Box 13087
Austin, Texas 78711-3087

This is a renewal of Permit No. WQ0004636000 issued on October 7, 2016.

PERMIT TO DISPOSE OF WASTEWATER TREATMENT PLANT SEWAGE SLUDGE AND WATER TREATMENT PLANT RESIDUALS
under provisions of Chapter 26 of the Texas Water Code and under provision of Texas Health & Safety Code Ann. Chapter 361 (Vernon)

I. Name of Permittee: GCC Sun City Materials, LLC

Address: 1 McKelligon Canyon Road
El Paso, Texas 79930

Type of Permit: Renewal

II. Nature of Business Producing Waste: Disposal via Monofill of Domestic Wastewater Treatment Plant (WWTP) Sewage Sludge and Water Treatment Plant (WTP) Residuals (SIC Code 4953).

III. General Description and Location of Waste Treatment Facility:

Description: The monofill facility described as "Cerro Alto Monofill Area C" consists of 142 acres and is located in the northeast area of the 1,000 acre site, which is located 30 miles east of El Paso. (See Attachment A). The disposal unit is designed to handle 882 cubic yards per day of WWTP sewage sludge and WTP residuals, with the estimated life of Monofill Area C being 4 years.

Location: The disposal unit is located 3.3 miles east of the intersection of Gary Lee and Hueco Ranch Road, at the eastern end of Gary Lee Road, in Hudspeth County, Texas 79938. (See Attachment B). The disposal unit is located within the drainage basin of the Rio Grande Below Riverside Diversion Dam in Segment No. 2307 of the Rio Grande Basin.

The permittee is authorized to process, store and dispose of wastes in accordance with the limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission and laws of the State of Texas. Nothing in this permit exempts the permittee from compliance with applicable rules and regulations of the TCEQ. This permit is issued under the Texas Pollutant Discharge Elimination System (TPDES) program. The permittee must handle and dispose of sewage sludge in accordance with all applicable state and federal regulations to protect public health and the environment. This permit does not authorize any invasion of personal rights nor any violation of federal, state or local laws or regulations.

This permit and the authorization contained herein shall expire **at midnight five years from the date of issuance** listed below.

ISSUED DATE:

For the Commission

IV. GENERAL PROVISIONS:

The permittee is authorized to dispose WWTP sewage sludge and WTP residuals on 142 acres in accordance with 30 Texas Administrative Code (TAC) Chapter 312 and all other applicable state and federal regulations to protect public health and the environment from any reasonable anticipated adverse effects due to any toxic pollutants which may be present.

A. General Requirements

1. No hazardous, toxic, radioactive, regulated asbestos, or any industrial solid waste, will be accepted, stored, processed, or disposed of at this site.

2. The permittee shall give 180 days prior notice to the Executive Director of the TCEQ of any change planned in the disposal practice or prior to start of any construction which would decrease or increase the disposal capacity of the disposal unit.

3. Sludge placed on an active sludge unit shall not contaminate an aquifer. Results of a groundwater monitoring program developed by a qualified groundwater scientist or a certification by a qualified groundwater scientist shall be used to demonstrate that sewage sludge placed on an active sludge unit does not contaminate an aquifer. All necessary steps to protect groundwater from contamination by sludge or residuals from the disposal unit shall be taken.

4. Equipment capable of dewatering the waste control facility within 21 days following a 25-year, 24-hour rainfall event shall be available for use at the site at all times.

5. Waste control facilities shall be isolated from storm water run-on by berms or diversion terraces. The permittee shall not take any action which will divert rainfall runoff onto the property of adjacent landowners without the permission of such landowners.

6. All solid waste materials resulting from cleaning operations and the sludge deposited in waste control facilities and drainage ditches shall be disposed of so that no contamination of surface waters can occur. All waste shall be disposed of in a manner such that contamination of surface and ground waters is prevented and such that nuisance conditions (such as insect infestations or objectionable odors) are controlled. Any areas on which solid waste is stockpiled shall be isolated by dikes, terraces, and terrain to prevent the discharge of any contaminated runoff into waters in the State of Texas.

7. Off-site discharge of recovered liquids is prohibited. The facility shall be managed so as to prevent ponding of process generated liquids on the ground, prevent contamination of ground or surface waters and to prevent the occurrence of nuisance conditions.

8. All facilities including ponds, pipes, ditches, and pumps shall be utilized and maintained as necessary in order to prevent any unauthorized discharge to waters in the State.

9. Water retention facilities shall be lined to control seepage in one of the following manners:

   a. In-situ or placed and compacted clay soils meeting the following requirements:

      i. more than or equal to 30% passing a No. 200 mesh sieve;
      ii. liquid limit greater than 30%;
      iii. plasticity index greater than 15;
      iv. a minimum thickness of 12 inches;

v. permeability equal to or less than $1x10^{-7}$ cm/sec; and
vi. soil compaction will be 95% standard proctor at optimum moisture content.

b. Membrane lining with a minimum thickness of 20 mils, and an underdrain leak detection system.

c. An alternate method of pond lining may be utilized with prior approval from the Executive Director.

The permittee shall furnish certification by a Professional Engineer licensed in Texas that any pond lining for ponds constructed after the issuance date of this permit meets the appropriate criteria prior to utilization. The certification shall be sent to the TCEQ Land Application Team (MC 150) and the Regional Office (MC Region 6).

B. Management Practices

1. No sludge or residuals failing the TCLP test shall be transported to this site.

2. All disposal operations shall be operated so as to minimize odor and nuisance conditions and prevent contamination of ground or surface waters.

3. The permittee shall maintain a minimum of a 150-foot buffer zone from the disposal unit to any water wells, including wells that are off-site.

4. Sludge or residuals shall not be placed on an active sludge unit if it is likely to adversely affect a threatened or endangered species of plant, fish or wildlife listed under the Endangered Species Act, §4, or its designated critical habitat.

5. An active disposal unit shall not restrict the flow of the 100-year flood nor be located within the 100-year floodway.

6. An active disposal unit shall not be located in an unstable area.

7. An active disposal unit shall not be located in a wetland except as provided in permit issued pursuant to the federal Clean Water Act §402 or §404.

8. Runoff from an active disposal unit shall be collected and disposed in accordance with the applicable requirements. The runoff collection system for an active disposal unit shall have the capacity to handle runoff from a 25-year, 24-hour rainfall event.

9. A food crop, feed crop, or a fiber crop shall not be grown on an active disposal unit.

10. Animals shall not be grazed on an active disposal unit.

11. Public access to a disposal unit shall be restricted during the period of three years after the last active disposal unit closes. The facility entrances will be closed and locked outside of normal operating hours. The perimeter fence shall be monitored and repaired as needed to maintain site security. Waste transporters will be restricted to the designated unloading areas only.

12. Sludge and residuals placed on an active disposal unit shall not contaminate an aquifer.

13. No sludge or residuals with a polychlorinated biphenyl (PCB) concentration of greater than or equal to 50 mg/kg (dry weight basis) shall be transported to this disposal unit.

C. Testing Requirements

1. Metals:

a. The concentration of each metal listed in Table 1 in sewage sludge placed on an active disposal unit that does not have a liner and leachate collection system shall be equal to or less than concentration for each metal listed in Table 1.

Table 1

Pollutant	Concentration (Milligrams per kilogram)*
Arsenic	73
Chromium	600
Nickel	420

* Dry weight basis

b. The concentration of pollutants in sewage sludge placed on an active disposal unit whose boundary is less than 150 meters from the property line of the active disposal unit area shall not exceed the concentration in Table 2 that corresponds to the shortest actual distance from the active sludge unit boundary to the property line of the active disposal unit area.

Table 2 – Metal Concentrations

Unit Boundary to Property Line Distance (Meters)	Metal Concentration (dry weight basis)		
	Arsenic (mg/kg)	Chromium (mg/kg)	Nickel (mg/kg)
0 to less than 25	30	200	210
25 to less than 50	34	220	240
50 to less than 75	39	260	270
75 to less than 100	46	300	320
100 to less than 125	53	360	390
125 to less than 150	62	450	420

2. Pathogen Control

All sewage sludge that is placed on an active sludge unit shall meet either the Class A pathogen reduction requirements in 30 TAC §312.82(a) or the Class B pathogen reduction requirements in 30 TAC §312.82(b)(1)(A) and (b)(2).

3. Vector Attraction Reduction Requirements

All sewage sludge that is placed on an active sludge unit shall meet one of the alternatives of the vector attraction reduction options in 30 TAC §312.83(b)(1) through (11).

D. Monitoring Requirements

1. Alternative 1: All metal constituents and fecal coliform or Salmonella sp. bacteria shall be monitored at the appropriate frequency shown below, pursuant to 30 TAC §312.46(a)(1):

Amount of sewage sludge (*) dry metric tons per 365 day period	Frequency
0 to less than 290	once per year
290 to less than 1,500	once per quarter

(*) The amount of bulk sewage sludge placed on an active sludge unit (dry weight basis).

2. Alternative 2: A composite sample may be taken, comprised of grab samples from the various sludge source facilities, once per quarter and tested for all metal constituents and fecal coliform or Salmonella sp. bacteria, pursuant to 30 TAC §312.46(a)(1). If any composite sample analysis results in non-compliance with the limits contained in this permit, all sludge applications must cease and the individual plants must be tested to determine which source facility caused the non-compliance.

E. Record Keeping Requirements

The permittee shall develop and keep records of all disposal activities and shall be made available to TCEQ upon request. Such records will include the following information:

1. the concentration (mg/kg) of each metal listed in Table 2 in the sewage sludge;

2. the following certification statement:

"I certify, under penalty of law, that the management practices in 30 TAC §312.64 and the vector attraction reduction requirements in (insert the citation to the specific requirements that are met from 30 TAC §312.83(b) of this title) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the management practices for vector attraction reduction have been met. I am aware that there are significant penalties for false certification including fine and imprisonment.";

3. a description of how the management practices listed above in IV.B. are being met;

4. a description of how the vector attraction reduction requirements and the pathogen reduction requirements are met for sewage sludge; and

5. dates of disposal and quantities (in dry tons) of each waste type.

The above records shall be maintained on a monthly basis and shall be made available to the TCEQ upon request. These records shall be retained for 5 years or for the duration of the permit, whichever is longer.

F. Reporting Requirements

The permittee shall report annually to the TCEQ Regional Office (Region 6) and to the Land Application Team (MC 150) of the Water Quality Division, by September 30th (report period September 1st of previous year through August 31st of current year) of each year the "Annual Sludge Summary Disposal Report Form" (Attachment C) and the following information:

1. the frequency of monitoring listed in Provision IV.D. which applies to the permittee;

2. results of tests performed for pollutants found in Table 2 for the permittee's practices;

3. identity of haulers and their TCEQ transporter numbers;

4. dates of disposal and quantities in dry tons of each waste type;

5. amount disposed in dry tons of each waste type;

6. level of pathogen reduction achieved (for sewage sludge only);

7. alternative used as listed in 30 TAC §312.82 (a) or (b). Describe how the pathogen reduction requirements are met (for sewage sludge only);

8. vector attraction reduction alternative used as listed in 30 TAC §312.83 (for sewage sludge only);

9. verification statement listed in 30 TAC §312.67(a)(2)(B) shall be attached to the annual reporting form; and

10. continuing evidence of financial responsibility to assure the commission that the responsible owner or operator has sufficient assets to properly operate the site and to provide proper closure and post-closure. This assurance for the proper operation of the site may be in the form of performance bonds, letters of credit from recognized financial institutions, trust funds, or insurance.

G. Closure Requirements

1. The permittee of an active sludge unit shall submit a written "closure and post closure plan" to the Land Application Team (MC 150) of the Water Quality Division, for approval, at least 180 days prior to the date that the active disposal unit closes. After the plan has been approved by the Executive Director, it shall be reviewed every three years for compliance with applicable state and federal laws. The permittee shall be responsible for any corrections necessary to achieve compliance with applicable state and federal law. The executive director may reduce the post closure maintenance period for disposal units if all wastes and waste residues have been removed during closure. The plan shall describe how the disposal unit will be closed and, at a minimum shall include:

   a. a discussion of how the leachate collection system will be operated and maintained for three years after the sludge unit closes;

   b. a discussion of how public access to the disposal unit will be restricted for a minimum of three years after the last sludge unit in the disposal unit closes;

2. The permittee shall also comply with the post-closure care maintenance requirements as discussed below for the duration of the post-closure period for this disposal unit. For a minimum of the first three years after the completion of final closure, the permittee shall retain the right of entry to and maintain all rights-of-way of a closed surface disposal unit in order to conduct periodic inspections of the closed disposal unit.

3. Following completion of the post-closure care maintenance period for each surface disposal unit, the permittee shall submit to the executive director for review and approval a documented certification, signed by an independent Texas Licensed Professional Engineer, verifying that post-closure care maintenance has been completed in accordance with the approved post-closure plan. The submittal to the executive director shall include all applicable documentation necessary for the certification of completion of post-closure care maintenance. Once approved, this certification shall be retained by the permittee.

V. FACILITY DESIGN, CONSTRUCTION, AND OPERATION

A. General Design and Construction

1. Facility design, construction, and operation must comply with this permit, the TCEQ rules, and be in accordance with the site development plan for the construction and the operation approved herein.

2. The entire waste control facility shall be designed, constructed, operated, and maintained to prevent the release and migration of any waste or contamination, and to prevent inundation of and discharge from the areas surrounding the facility components. Each receiving and disposal unit shall be provided with a containment system which will collect spills and incident precipitation in such a manner as to:

   a. preclude the release of any contaminated runoff, spills, or precipitation;

   b. prevent washout of any waste by a 100-year storm; and

   c. prevent run-on into the disposal unit.

3. All recovered water shall be managed as specified in General Provision IV.A.4.

4. Final Cover: At a minimum, final cover shall consist of two feet of soil/clay. The coefficient of permeability of the final cover shall not exceed that of the liner.

B. General Operational Requirements

The site and monofill shall be managed and operated in accordance with the most recent and applicable rules adopted by the Commission relating to municipal wastewater treatment plant sludge and water treatment residuals monofills.

VIII. STANDARD PROVISIONS:

A. This permit is granted in accordance with the Texas Water Code and the rules and other Orders of the Commission and the laws of the State of Texas.

B. Unless specified otherwise, any noncompliance which may endanger human health or safety, or the environment must be reported to the TCEQ. Report of such information must be provided orally or by facsimile transmission (FAX) to the TCEQ Regional Office (MC Region 6) within 24 hours of becoming aware of the noncompliance. A written submission of such information must also be provided to the TCEQ Regional Office (MC Region 6) and to the Enforcement Division (MC 224) within five working days of becoming aware of the noncompliance. The written submission must contain a description of the noncompliance and its cause; the potential danger to human health or safety, or the environment; the period of noncompliance, including exact dates and times; if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance, and to mitigate its adverse effects.

C. Acceptance of this permit constitutes an acknowledgment and agreement that the permittee will comply with all the terms, provisions, conditions, limitations and restrictions embodied in this permit and with the rules and other Orders of the Commission and the laws of the State of Texas. Agreement is a condition precedent to the granting of this permit.

D. Prior to any transfer of this permit, Commission approval must be obtained. The Commission should be notified, in writing, of any change in control or ownership of facilities authorized by this permit. Such notification should be sent to the TCEQ Water Quality Division Application Review and Processing Team (MC 148).

E. The application pursuant to which the permit has been issued is incorporated herein; provided, however, that in the event of a conflict between the provisions of this permit and the application, the provisions of the permit must control.

F. The permittee is subject to the provisions of 30 TAC Section 305.125.

G. Any proposed site changes, addition of land area, or expansion in the capacity which have not been addressed by the terms of this permit must be authorized in accordance with the Texas Natural Conservation Commission permit amendment or modification rules 30 TAC Chapter 305.

H. According to 30 TAC §305.125 (10) inspection and entry must be allowed as prescribed in the Texas Water Code Chapters 26, 27, and 28 and the Texas Solid Waste Disposal Act.

IX. SPECIAL PROVISIONS:

A. As per 30 Texas Administrative Code (TAC) Chapter 312.64(j), when a final cover is placed on a disposal unit at closure, the concentration of methane gas in air in any structure within the disposal unit shall not exceed 25% of the lower explosive limit for methane gas for three years after the disposal unit closes and the concentration of methane gas in air at the property line of the disposal unit shall not exceed the lower explosive limit for methane gas for three years after the disposal unit closes.

The permittee shall comply with the closure and post closure plan. The plan describes how the disposal unit will be closed and includes the following as stated in 30 TAC §312.62(c):

1. A discussion of how the leachate collection system will be operated and maintained for three years after the sludge unit closes if the disposal unit has a liner and leachate collection system.

2. A description of the system used to monitor for methane gas in the air in any structures within the disposal unit and in the air at the property line of the disposal unit.

3. A discussion of how public access to the disposal unit will be restricted for a minimum of three years after the last disposal of WWTP sewage sludge or WTP residuals in the surface disposal unit closes.

4. The final cover system for aerial fill shall be composed of no less than two feet of soil. The first 18 inches or more of cover shall be of clayey soil, classification SC or CL as defined in the "Unified Soils Classification System" developed by the United States Army Corps of Engineers, compacted in layers of no more than six inches to minimize the potential for water infiltration. A CH soil may be used; however, this soil may experience excessive cracking and shall therefore be covered by a minimum of 12 inches of topsoil to retain moisture. Other types of soil may be used with prior written approval from the Executive Director. The final six inches of cover shall be of suitable topsoil that is capable of sustaining native plant growth and shall be seeded or sodded immediately following the application of the final cover in order to minimize erosion.

   Side slopes of the final cover for all above-ground disposal areas shall not exceed a 25% grade (four feet horizontal to one foot vertical). Side slopes for the final cover in excess of 25% may be authorized by the Executive Director provided that controlled drainage such as flumes, diversion terraces, spillways, or other acceptable methods are incorporated into the final cover system design submitted to the Executive Director for review and approval. The final cover for the topmost portion of a unit or facility shall have a gradient of not less than 2.0% and not greater than 6.0%, and shall possess a sufficient minimum grade to preclude ponding of surface water when total fill height and expected subsidence are taken into consideration.

B. The permittee shall deed record the disposal unit that includes the following items as stated in 30 TAC §312.62(f):

1. A metes and bounds description of the portion of the tract of land in which the in-place closing of the remaining WWTP sewage sludge and WTP residuals will take place.

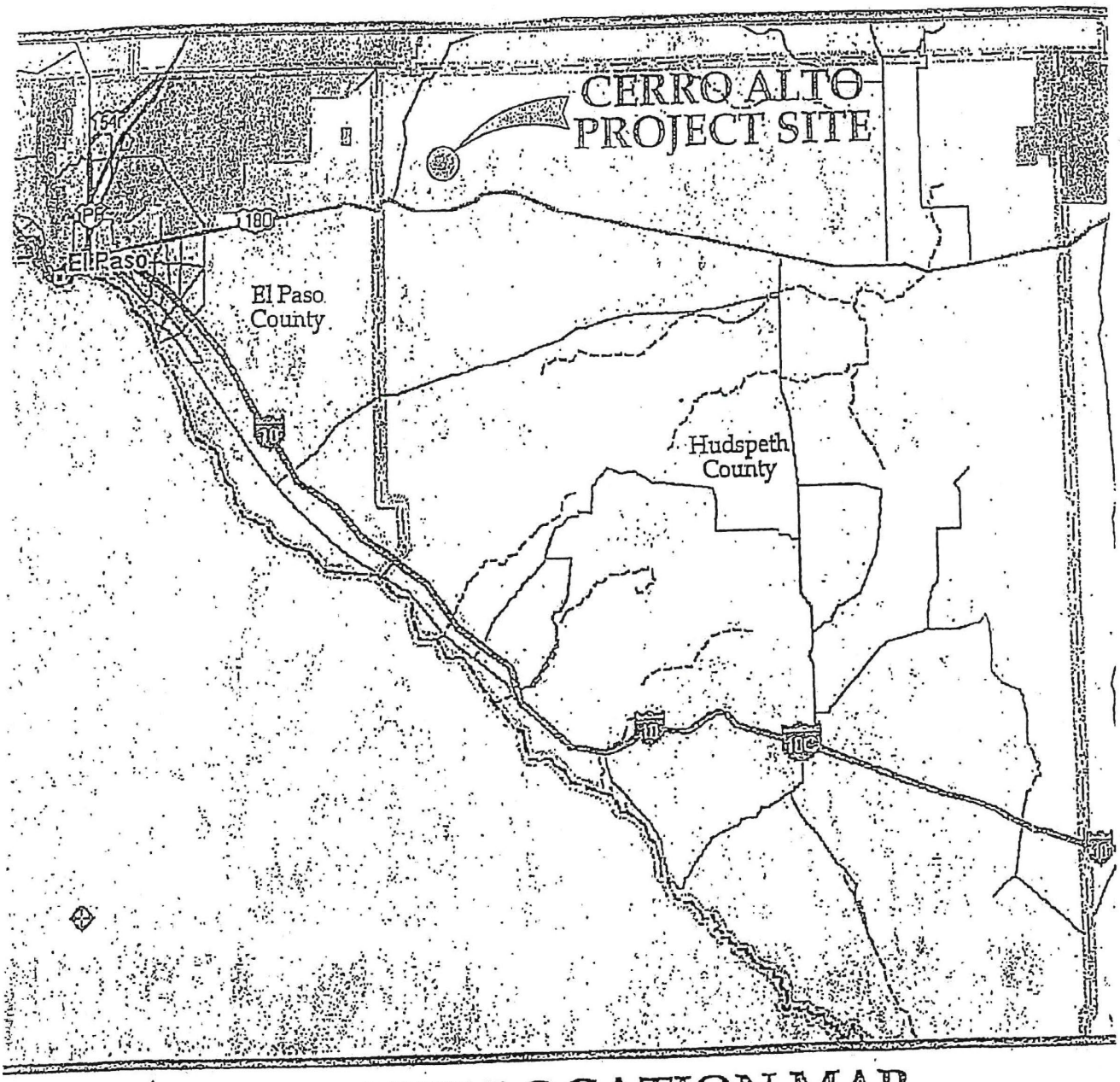
2. A detailed description, including the annual total metals analysis taken from the WWTP sewage sludge and WTP residuals which is to be disposed of.

3. All pertinent information related to the permit to dispose of WWTP sewage sludge and WTP residuals, including at least the permit number and issuing agency.

4. The name and permanent address of the facility where more specific information on the waste can be secured.

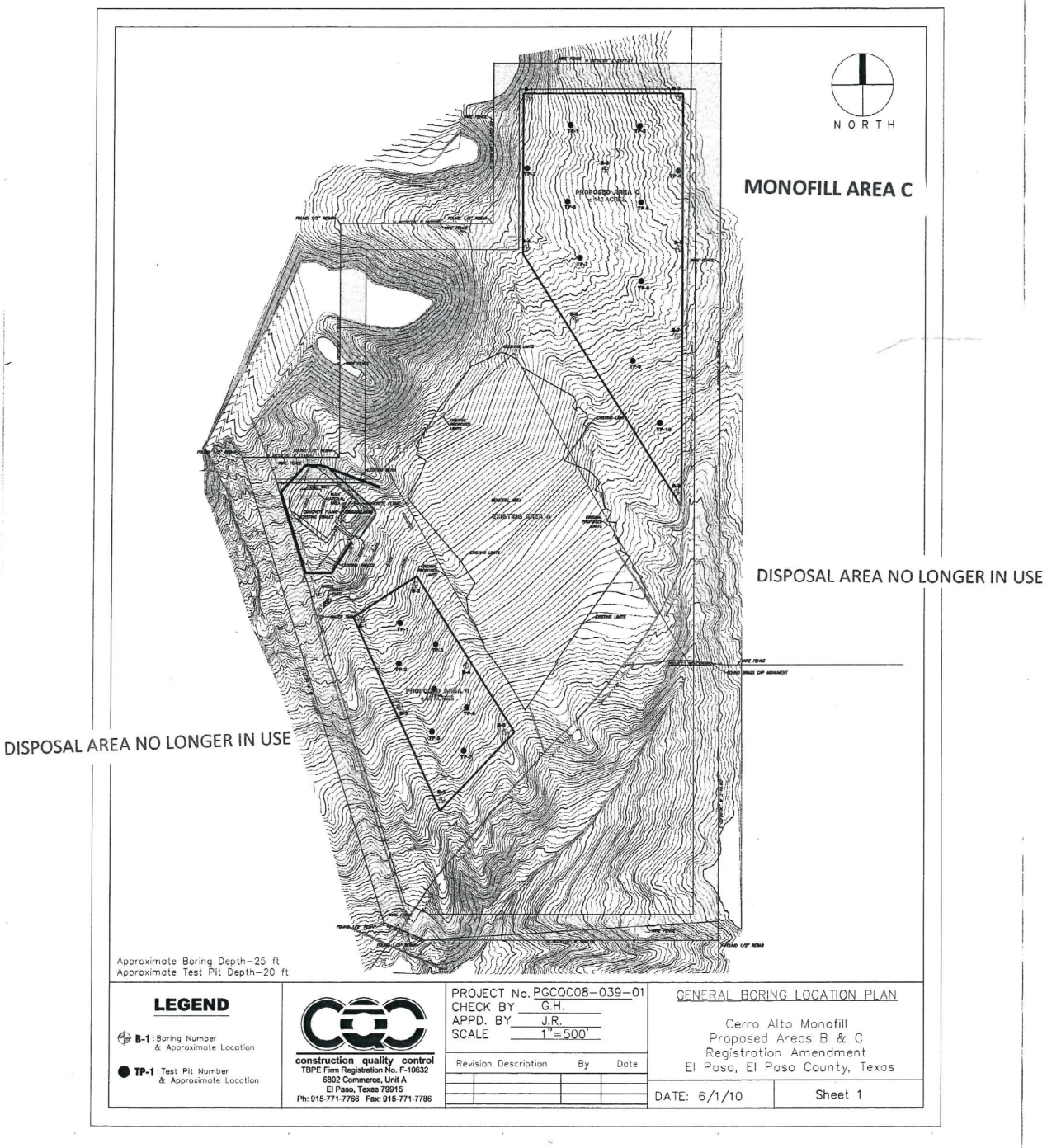
C. The permittee shall submit a cancellation form to the TCEQ Water Quality Division Application Review and Processing Team (MC 148) if Monofill C has reached its estimated life span prior to the expiration date of this permit.

Attachment A



SITE LOCATION MAP

Attachment B



Annual Disposal Summary Report Form
Attachment C

Note 1: If your site has more than one disposal field, please submit a separate form for each field.
Note 2: Please note, in addition to the summary form, you must submit all information as required by 30 TAC 312.48.
Note 3: If you operate other registered/permitted sludge land application sites, a form should be submitted for each site.
Note 4: Please send a copy of this sheet and all attachments to the TCEQ regional office in your area.

For TCEQ Fiscal Year ____ Reporting period from September 1, ____ to August 31, _____

PERMIT NO.: _____ **DATE:** _____

NAME OF PERMITTEE:_____

MAILING ADDRESS: _____

Contact Name: _____ **Telephone No:** _____

Field Number (if any) _____ (Submit separate form for each field, if site has two or more fields.)

1. Sewage Sludge:
   a. Land Applied _____ Dry tons/year
   b. Disposed via monofill _____ Dry tons/year
   c. Disposed via MSW monofill _____ Dry tons/year
2. Water Treatment Plant Residuals:
   a. Land Applied _____ Dry tons/year
   b. Disposed via monofill _____ Dry tons/year
   c. Disposed via MSW monofill _____ Dry tons/year
3. Class A material land applied _____ Dry tons/year

Acreage used for sludge application/disposal at this site: _____ acres

Site Vegetation (such as grass type, etc.) and number of cuttings: _____

PLEASE MAIL THE COMPLETED ANNUAL REPORT TO:

Texas Commission on Environmental Quality
Land Application Team (MC 150)
Water Quality Assessment Section
P.O. Box 13087
Austin, Texas 78711-3087

The TCEQ is committed to accessibility.
To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.

Compliance History Report

Compliance History Report for CN605241686, RN103155024, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator: CN605241686, Gcc Sun City Materials, LLC **Classification:** HIGH **Rating:** 0.00

Regulated Entity: RN103155024, CERRO ALTO MONOFILL SLUDGE **Classification:** UNCLASSIFIED **Rating:** -----

Complexity Points: 3 **Repeat Violator:** NO

CH Group: 11 - Waste Management (Excluding Landfills)

Location: SLUDGE DISPOSAL LOCATED APPROX 30 MI E OF EL PASO APPROX 5 1/4 MI NE OF THE INTX OF LOMA LINDA RD AND US HWY 62 AND 180 IN HUDSPETH COUNTY HUDSPETH, TX, HUDSPETH COUNTY

TCEQ Region: REGION 06 - EL PASO

ID Number(s):

SLUDGE PERMIT WQ0004636000

SLUDGE EPA ID TXL005012

MUNICIPAL SOLID WASTE PROCESSING PERMIT 42036

Compliance History Period: September 01, 2017 to August 31, 2022 **Rating Year:** 2022 **Rating Date:** 09/01/2022

Date Compliance History Report Prepared: March 08, 2023

Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.

Component Period Selected: April 09, 2016 to March 08, 2023

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: KELLIE CROUCH **Phone:** (512) 239-2435

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period? YES

2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1 September 30, 2022 (1840853)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:
N/A

I. Participation in a voluntary pollution reduction program:
N/A

J. Early compliance:
N/A

Sites Outside of Texas:
N/A