March 17, 2025

ALAMO CEMENT COMPANY

Aboveground Storage Tank Facility Plan Modification

Alamo Cement Plant – San Antonio, Texas

PROJECT NUMBER:
0252331.01.01

PROJECT CONTACT:
Steve McVey, PG
EMAIL:
steve.mcvey@powereng.com
PHONE:
512-879-6625

POWER ENGINEERS
MEMBER OF WSP

Alamo Cement Plant – San Antonio, Texas

PREPARED FOR: *ALAMO CEMENT COMPANY*

PREPARED BY: *STEVE MCVEY, PG*
512-879-6625
STEVE.MCVEY@POWERENG.COM

Modification of a Previously Approved Plan Checklist

✓ **Edwards Aquifer Application Cover Page (TCEQ-20705)**

✓ **General Information Form (TCEQ-0587)**

Attachment A - Road Map
Attachment B - USGS / Edwards Recharge Zone Map
Attachment C - Project Description

– **Geologic Assessment Form (TCEQ-0585)**

Attachment A - Geologic Assessment Table (TCEQ-0585-Table)
Attachment B - Stratigraphic Column
Attachment C - Site Geology
Attachment D - Site Geologic Map(s)

✓ **Modification of a Previously Approved Plan (TCEQ-0590)**

Attachment A - Original Approval Letter and Approved Modification Letters
Attachment B - Narrative of Proposed Modification
Attachment C - Current Site Plan of the Approved Project

✓ **Application Form (include any applicable to the proposed modification):**

✓ Aboveground Storage Tank Facility Plan (TCEQ-0575)
Organized Sewage Collection System Application (TCEQ-0582)
Underground Storage Tank Facility Plan (TCEQ-0583)
Water Pollution Abatement Plan Application (TCEQ-0584)
Lift Station / Force Main System Application (TCEQ-0624)

✓ **Temporary Stormwater Section (TCEQ-0602)**

Attachment A - Spill Response Actions
Attachment B - Potential Sources of Contamination
Attachment C - Sequence of Major Activities
Attachment D - Temporary Best Management Practices and Measures
Attachment E - Request to Temporarily Seal a Feature (if requested)
Attachment F - Structural Practices
Attachment G - Drainage Area Map
Attachment H - Temporary Sediment Pond(s) Plans and Calculations
Attachment I - Inspection and Maintenance for BMPs
Attachment J - Schedule of Interim and Permanent Soil Stabilization Practices

X **Permanent Stormwater Section (TCEQ-0600), if necessary**

Attachment A - 20% or Less Impervious Cover Declaration (if requested for multi-family, school, or small business site)
Attachment B - BMPs for Upgradient Stormwater

Attachment C - BMPs for On-site Stormwater
Attachment D - BMPs for Surface Streams
Attachment E - Request to Seal Features, if sealing a feature
Attachment F - Construction Plans
Attachment G - Inspection, Maintenance, Repair and Retrofit Plan
Attachment H - Pilot-Scale Field Testing Plan (if requested)
Attachment I -Measures for Minimizing Surface Stream Contamination

✓ **Agent Authorization Form (TCEQ-0599), if application submitted by agent**

✓ **Application Fee Form (TCEQ-0574)**

✓ **Check Payable to the "Texas Commission on Environmental Quality"**

✓ **Core Data Form (TCEQ-10400)**

Texas Commission on Environmental Quality

Edwards Aquifer Application Cover Page

Our Review of Your Application

The Edwards Aquifer Program staff conducts an administrative and technical review of all applications. The turnaround time for administrative review can be up to 30 days as outlined in 30 TAC 213.4(e). Generally administrative completeness is determined during the intake meeting or within a few days of receipt. The turnaround time for technical review of an administratively complete Edwards Aquifer application is 90 days as outlined in 30 TAC 213.4(e). Please know that the review and approval time is directly impacted by the quality and completeness of the initial application that is received. In order to conduct a timely review, it is imperative that the information provided in an Edwards Aquifer application include final plans, be accurate, complete, and in compliance with 30 TAC 213.

Administrative Review

1. Edwards Aquifer applications must be deemed administratively complete before a technical review can begin. To be considered administratively complete, the application must contain completed forms and attachments, provide the requested information, and meet all the site plan requirements. The submitted application and plan sheets should be final plans. Please submit one full-size set of plan sheets with the original application, and half-size sets with the additional copies.

   To ensure that all applicable documents are included in the application, the program has developed tools to guide you and web pages to provide all forms, checklists, and guidance. Please visit the below website for assistance: http://www.tceq.texas.gov/field/eapp.

2. This Edwards Aquifer Application Cover Page form (certified by the applicant or agent) must be included in the application and brought to the administrative review meeting.

3. Administrative reviews are scheduled with program staff who will conduct the review. Applicants or their authorized agent should call the appropriate regional office, according to the county in which the project is located, to schedule a review. The average meeting time is one hour.

4. In the meeting, the application is examined for administrative completeness. Deficiencies will be noted by staff and emailed or faxed to the applicant and authorized agent at the end of the meeting, or shortly after. Administrative deficiencies will cause the application to be deemed incomplete and returned.

   An appointment should be made to resubmit the application. The application is re-examined to ensure all deficiencies are resolved. The application will only be deemed administratively complete when all administrative deficiencies are addressed.

5. If an application is received by mail, courier service, or otherwise submitted without a review meeting, the administrative review will be conducted within 30 days. The applicant and agent will be contacted with the results of the administrative review. If the application is found to be administratively incomplete, it can be retrieved from the regional office or returned by regular mail. If returned by mail, the regional office may require arrangements for return shipping.

6. If the geologic assessment was completed before October 1, 2004 and the site contains "possibly sensitive" features, the assessment must be updated in accordance with the *Instructions to Geologists* (TCEQ-0585 Instructions).

Technical Review

1. When an application is deemed administratively complete, the technical review period begins. The regional office will distribute copies of the application to the identified affected city, county, and groundwater conservation district whose jurisdiction includes the subject site. These entities and the public have 30 days to provide comments on the application to the regional office. All comments received are reviewed by TCEQ.

2. A site assessment is usually conducted as part of the technical review, to evaluate the geologic assessment and observe existing site conditions. The site must be accessible to our staff. The site boundaries should be

clearly marked, features identified in the geologic assessment should be flagged, roadways marked and the alignment of the Sewage Collection System and manholes should be staked at the time the application is submitted. If the site is not marked the application may be returned.

3. We evaluate the application for technical completeness and contact the applicant and agent via Notice of Deficiency (NOD) to request additional information and identify technical deficiencies. There are two deficiency response periods available to the applicant. There are 14 days to resolve deficiencies noted in the first NOD. If a second NOD is issued, there is an additional 14 days to resolve deficiencies. If the response to the second notice is not received, is incomplete or inadequate, or provides new information that is incomplete or inadequate, the application must be withdrawn or will be denied. Please note that because the technical review is underway, whether the application is withdrawn or denied **the application fee will be forfeited**.
4. The program has 90 calendar days to complete the technical review of the application. If the application is technically adequate, such that it complies with the Edwards Aquifer rules, and is protective of the Edwards Aquifer during and after construction, an approval letter will be issued. Construction or other regulated activity may not begin until an approval is issued.

Mid-Review Modifications

It is important to have final site plans prior to beginning the permitting process with TCEQ to avoid delays.

Occasionally, circumstances arise where you may have significant design and/or site plan changes after your Edwards Aquifer application has been deemed administratively complete by TCEQ. This is considered a "Mid-Review Modification". Mid-Review Modifications may require redistribution of an application that includes the proposed modifications for public comment.

If you are proposing a Mid-Review Modification, two options are available:

- If the technical review has begun your application can be denied/withdrawn, your fees will be forfeited, and the plan will have to be resubmitted.
- TCEQ can continue the technical review of the application as it was submitted, and a modification application can be submitted at a later time.

If the application is denied/withdrawn, the resubmitted application will be subject to the administrative and technical review processes and will be treated as a new application. The application will be redistributed to the affected jurisdictions.

Please contact the regional office if you have questions. If your project is located in Williamson, Travis, or Hays County, contact TCEQ's Austin Regional Office at 512-339-2929. If your project is in Comal, Bexar, Medina, Uvalde, or Kinney County, contact TCEQ's San Antonio Regional Office at 210-490-3096

Please fill out all required fields below and submit with your application.

1. Regulated Entity Name: Alamo Cement Company						**2. Regulated Entity No.:100220474**			
3. Customer Name: Alamo Cement Company II, Ltd.						**4. Customer No.:600130637**			
5. Project Type: **(Please circle/check one)**	New		Modification			Extension		Exception	
6. Plan Type: **(Please circle/check one)**	WPAP	CZP	SCS	UST	AST	EXP	EXT	Technical Clarification	Optional Enhanced Measures
7. Land Use: **(Please circle/check one)**	Residential		Non-residential			**8. Site (acres):**		1,836	
9. Application Fee:	$4,550		**10. Permanent BMP(s):**			Secondary Containment			
11. SCS (Linear Ft.):			**12. AST/UST (No. Tanks):**			5 existing ASTs plus 7 new ASTs			
13. County:	Bexar		**14. Watershed:**			Upper Cibolo Ck & Headwaters Salado Ck			

Application Distribution

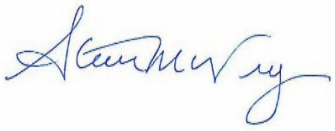
Instructions: Use the table below to determine the number of applications required. One original and one copy of the application, plus additional copies (as needed) for each affected incorporated city, county, and groundwater conservation district are required. Linear projects or large projects, which cross into multiple jurisdictions, can require additional copies. Refer to the "Texas Groundwater Conservation Districts within the EAPP Boundaries" map found at:

http://www.tceq.texas.gov/assets/public/compliance/field_ops/eapp/EAPP%20GWCD%20map.pdf

For more detailed boundaries, please contact the conservation district directly.

Austin Region			
County:	**Hays**	**Travis**	**Williamson**
Original (1 req.)	___	___	___
Region (1 req.)	___	___	___
County(ies)	___	___	___
Groundwater Conservation District(s)	___Edwards Aquifer Authority ___Barton Springs/ Edwards Aquifer ___Hays Trinity ___Plum Creek	___Barton Springs/ Edwards Aquifer	NA
City(ies) Jurisdiction	___Austin ___Buda ___Dripping Springs ___Kyle ___Mountain City ___San Marcos ___Wimberley ___Woodcreek	___Austin ___Bee Cave ___Pflugerville ___Rollingwood ___Round Rock ___Sunset Valley ___West Lake Hills	___Austin ___Cedar Park ___Florence ___Georgetown ___Jerrell ___Leander ___Liberty Hill ___Pflugerville ___Round Rock

San Antonio Region					
County:	**Bexar**	**Comal**	**Kinney**	**Medina**	**Uvalde**
Original (1 req.)	_x_	___	___	___	___
Region (1 req.)	_x_	___	___	___	___
County(ies)	_x_	___	___	___	___
Groundwater Conservation District(s)	_x_ Edwards Aquifer Authority ___Trinity-Glen Rose	___Edwards Aquifer Authority	___Kinney	___EAA ___Medina	___EAA ___Uvalde
City(ies) Jurisdiction	___Castle Hills ___Fair Oaks Ranch ___Helotes ___Hill Country Village ___Hollywood Park _x_San Antonio (SAWS) ___Shavano Park	___Bulverde ___Fair Oaks Ranch ___Garden Ridge ___New Braunfels ___Schertz	NA	___San Antonio ETJ (SAWS)	NA

I certify that to the best of my knowledge, that the application is complete and accurate. This application is hereby submitted to TCEQ for administrative review and technical review. Steve McVey
Print Name of Customer/Authorized Agent 
Signature of Customer/Authorized Agent Date March 10, 2025

FOR TCEQ INTERNAL USE ONLY				
Date(s)Reviewed:		Date Administratively Complete:		
Received From:		Correct Number of Copies:		
Received By:		Distribution Date:		
EAPP File Number:		Complex:		
Admin. Review(s) (No.):		No. AR Rounds:		
Delinquent Fees (Y/N):		Review Time Spent:		
Lat./Long. Verified:		SOS Customer Verification:		
Agent Authorization Complete/Notarized (Y/N):		Fee Check:	Payable to TCEQ (Y/N):	
Core Data Form Complete (Y/N):			Signed (Y/N):	
Core Data Form Incomplete Nos.:			Less than 90 days old (Y/N):	

General Information Form

Texas Commission on Environmental Quality

For Regulated Activities on the Edwards Aquifer Recharge and Transition Zones and Relating to 30 TAC §213.4(b) & §213.5(b)(2)(A), (B) Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

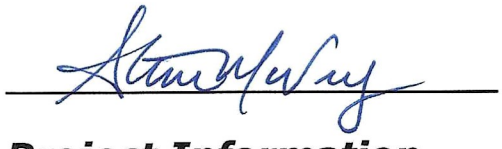
Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **General Information Form** is hereby submitted for TCEQ review. The application was prepared by:

Print Name of Customer/Agent: Steve McVey

Date: 3/10/2025

Signature of Customer/Agent:



Project Information

1. Regulated Entity Name: Alamo Cement Company
2. County: Bexar
3. Stream Basin: Cibolo Creek
4. Groundwater Conservation District (If applicable): Edwards Aquifer Authority
5. Edwards Aquifer Zone:
   - ☐ Recharge Zone
   - ☒ Transition Zone
6. Plan Type:
   - ☐ WPAP
   - ☐ SCS
   - ☐ Modification
   - ☒ AST
   - ☐ UST
   - ☐ Exception Request

7. Customer (Applicant):

   Contact Person: Samantha Ronk
   Entity: Alamo Cement Company
   Mailing Address: P.O. Box 34807
   City, State: San Antonio, TX Zip: 78265
   Telephone: 210-208-1938 FAX: 210-208-1990
   Email Address: sronk@alamocement.com

8. Agent/Representative (If any):

   Contact Person: Steve McVey
   Entity: POWER Engineers, Inc.
   Mailing Address: 7600B North Capital of Texas Highway, Suite 320
   City, State: Austin Zip: TX
   Telephone: 512-879-6625 FAX: _____
   Email Address: steve.mcvey@powereng.com

9. Project Location:

   ☒ The project site is located inside the city limits of San Antonio.
   ☐ The project site is located outside the city limits but inside the ETJ (extra-territorial jurisdiction) of _____.
   ☐ The project site is not located within any city's limits or ETJ.

10. ☐ The location of the project site is described below. The description provides sufficient detail and clarity so that the TCEQ's Regional staff can easily locate the project and site boundaries for a field investigation.

    The site is approximately one mile north of Loop 1604 and west of Green Mountain Road

11. ☒ **Attachment A – Road Map**. A road map showing directions to and the location of the project site is attached. The project location and site boundaries are clearly shown on the map.

12. ☒ **Attachment B - USGS / Edwards Recharge Zone Map**. A copy of the official 7 ½ minute USGS Quadrangle Map (Scale: 1" = 2000') of the Edwards Recharge Zone is attached. The map(s) clearly show:

    ☒ Project site boundaries.
    ☒ USGS Quadrangle Name(s).
    ☒ Boundaries of the Recharge Zone (and Transition Zone, if applicable).
    ☒ Drainage path from the project site to the boundary of the Recharge Zone.

13. ☒ **The TCEQ must be able to inspect the project site or the application will be returned**. Sufficient survey staking is provided on the project to allow TCEQ regional staff to locate the boundaries and alignment of the regulated activities and the geologic or manmade features noted in the Geologic Assessment.

☐ Survey staking will be completed by this date: _____

14. ☒ **Attachment C – Project Description**. Attached at the end of this form is a detailed narrative description of the proposed project. The project description is consistent throughout the application and contains, at a minimum, the following details:

    ☒ Area of the site
    ☒ Offsite areas
    ☒ Impervious cover
    ☒ Permanent BMP(s)
    ☒ Proposed site use
    ☒ Site history
    ☒ Previous development
    ☐ Area(s) to be demolished

15. Existing project site conditions are noted below:

    ☐ Existing commercial site
    ☒ Existing industrial site
    ☐ Existing residential site
    ☐ Existing paved and/or unpaved roads
    ☐ Undeveloped (Cleared)
    ☐ Undeveloped (Undisturbed/Uncleared)
    ☐ Other: _____

Prohibited Activities

16. ☒ I am aware that the following activities are prohibited on the Recharge Zone and are not proposed for this project:

    (1) Waste disposal wells regulated under 30 TAC Chapter 331 of this title (relating to Underground Injection Control);

    (2) New feedlot/concentrated animal feeding operations, as defined in 30 TAC §213.3;

    (3) Land disposal of Class I wastes, as defined in 30 TAC §335.1;

    (4) The use of sewage holding tanks as parts of organized collection systems; and

    (5) New municipal solid waste landfill facilities required to meet and comply with Type I standards which are defined in §330.41(b), (c), and (d) of this title (relating to Types of Municipal Solid Waste Facilities).

    (6) New municipal and industrial wastewater discharges into or adjacent to water in the state that would create additional pollutant loading.

17. ☒ I am aware that the following activities are prohibited on the Transition Zone and are not proposed for this project:

    (1) Waste disposal wells regulated under 30 TAC Chapter 331 (relating to Underground Injection Control);

(2) Land disposal of Class I wastes, as defined in 30 TAC §335.1; and

(3) New municipal solid waste landfill facilities required to meet and comply with Type I standards which are defined in §330.41 (b), (c), and (d) of this title.

Administrative Information

18. The fee for the plan(s) is based on:

- ☐ For a Water Pollution Abatement Plan or Modification, the total acreage of the site where regulated activities will occur.
- ☐ For an Organized Sewage Collection System Plan or Modification, the total linear footage of all collection system lines.
- ☒ For a UST Facility Plan or Modification or an AST Facility Plan or Modification, the total number of tanks or piping systems.
- ☐ A request for an exception to any substantive portion of the regulations related to the protection of water quality.
- ☐ A request for an extension to a previously approved plan.

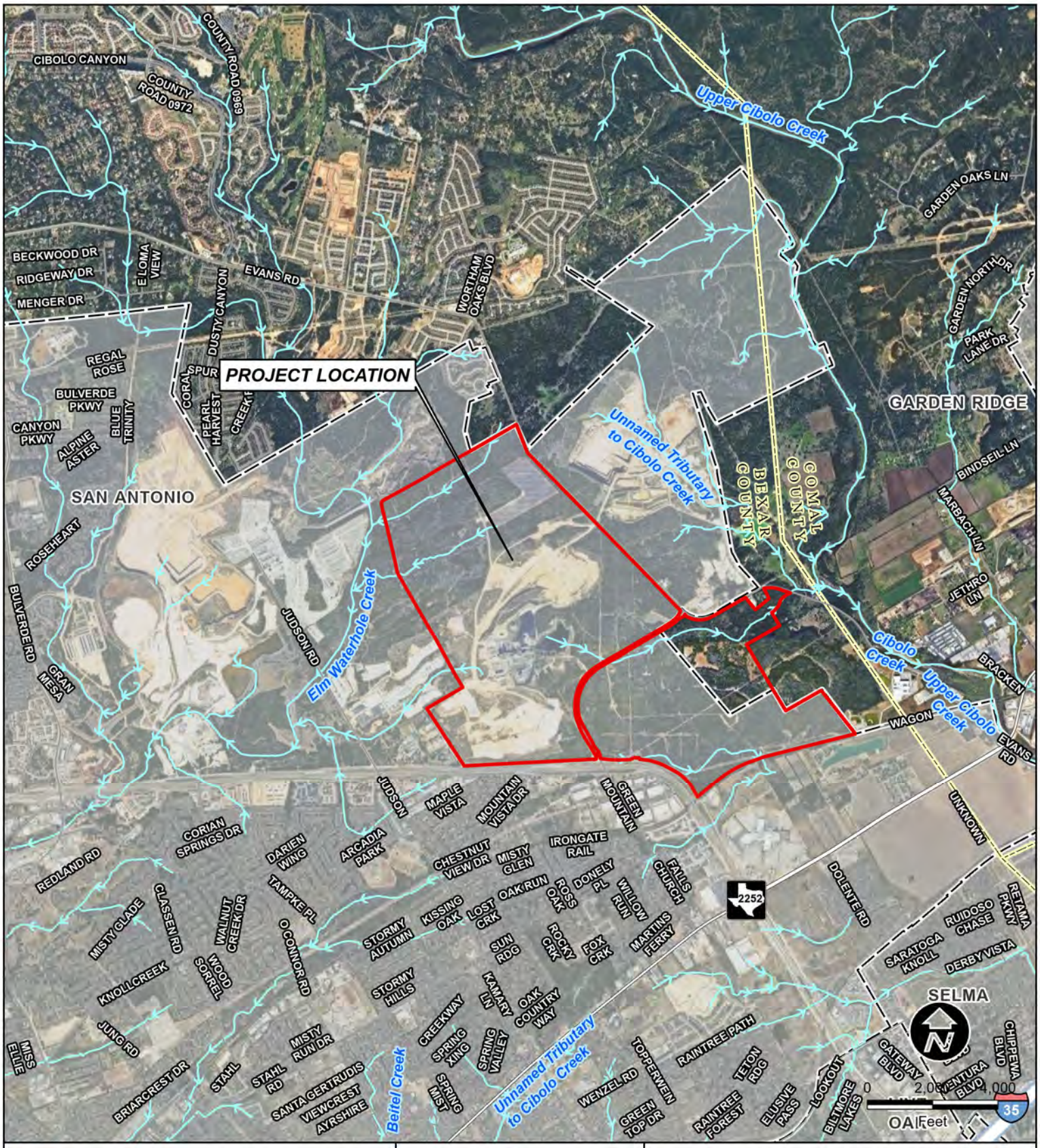
19. ☐ Application fees are due and payable at the time the application is filed. If the correct fee is not submitted, the TCEQ is not required to consider the application until the correct fee is submitted. Both the fee and the Edwards Aquifer Fee Form have been sent to the Commission's:

- ☐ TCEQ cashier
- ☐ Austin Regional Office (for projects in Hays, Travis, and Williamson Counties)
- ☒ San Antonio Regional Office (for projects in Bexar, Comal, Kinney, Medina, and Uvalde Counties)

20. ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

21. ☒ No person shall commence any regulated activity until the Edwards Aquifer Protection Plan(s) for the activity has been filed with and approved by the Executive Director.

ATTACHMENT A – ROAD MAP



Project Area
County Boundary
City Limit
Interstate Highway
FM Road
County or Local Road
Stream or River

BUZZI UNICEM USA
ALAMO CEMENT PLAN
GENERAL INFORMATION FORM
(TCEQ-0587)

ATTACHMENT A - ROAD MAP

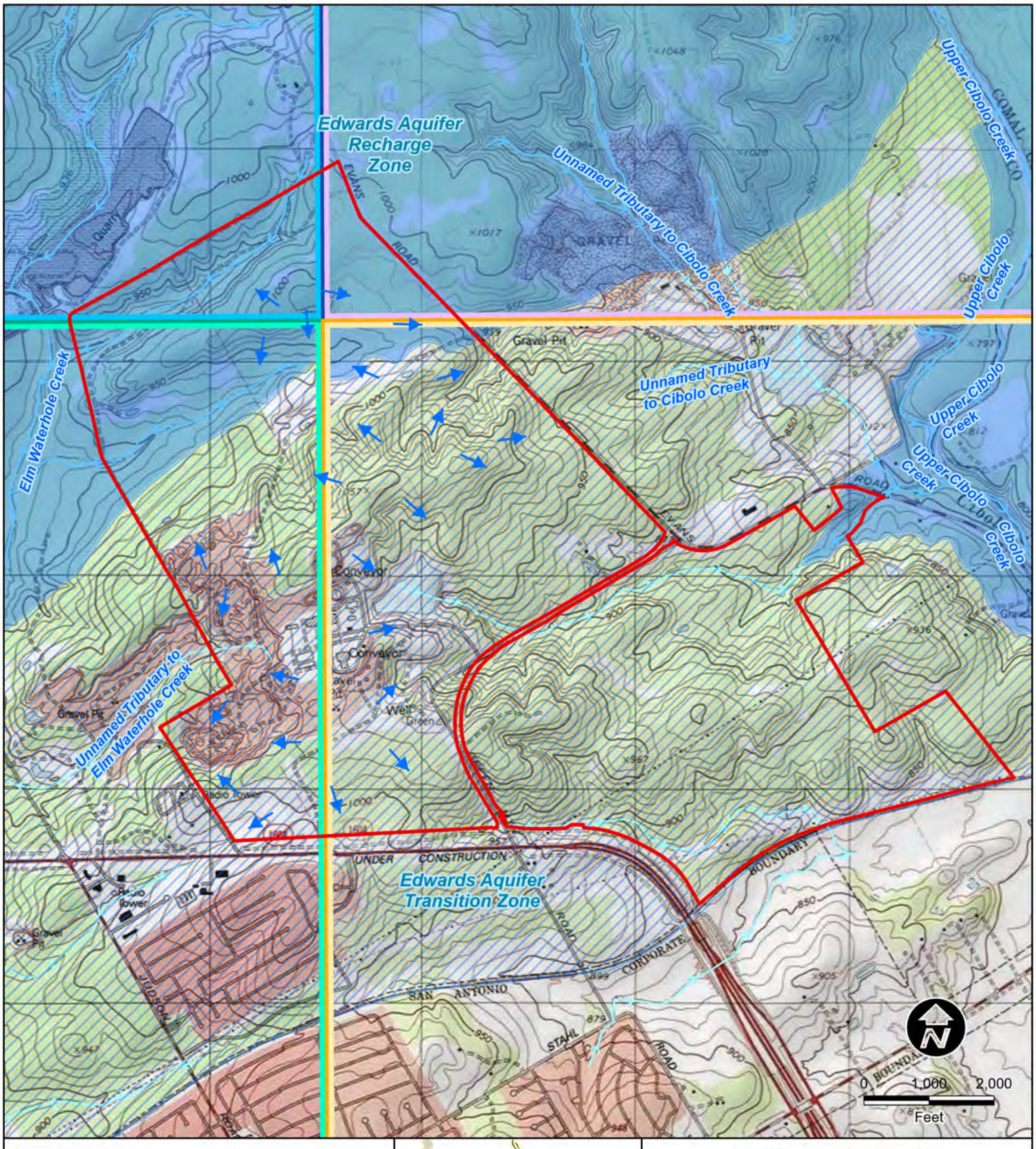
BEXAR COUNTY, TEXAS

POWER ENGINEERS

Date: 2/4/2025

Path: G:\Projects\178600_BuzziUnicem_AlamoCementPlant\Apps\178600_AlamoCementPlant.aprx

ATTACHMENT B – USGS/ EDWARDS RECHARGE ZONE MAP



BUZZI UNICEM USA
ALAMO CEMENT PLAN
GENERAL INFORMATION FORM
(TCEQ-0587)

ATTACHMENT B –
USGS MAP/EDWARDS AQUIFER RECHARGE ZONE MAP

BEXAR COUNTY, TEXAS

POWER ENGINEERS

Date: 2/4/2025

Path: G:\Projects\178600_BuzziUnicem_AlamoCementPlant\Apps\178600_AlamoCementPlant.aprx

ATTACHMENT C – PROJECT DESCRIPTION

This modification of a previously approved Aboveground Storage Tank (AST) Facility Plan has been prepared for Alamo Cement Company II, Ltd. (Alamo) in accordance with 30 Texas Administrative Code (TAC) 213.5(e).

Area of the Site, Offsite Areas, and Previous Development

The site is composed of two parcels situated northwest and southeast of West Green Mountain Road, inside the city limits of San Antonio in Bexar County, Texas (Attachment A). The site is currently developed as a cement plant and limestone quarry and occupies much of the northwest parcel (1,220 acres). The southeast parcel (616 acres) is vacant and undeveloped. The geographic coordinates of the approximate center of the plant are latitude 29.612298 degrees North, longitude -98.374166 degrees West. This site is located predominantly (1,476 acres) on the Transition Zone of the Edwards Aquifer with the remaining (361 acres) on the Recharge Zone (Attachment B).

Area(s) to be Demolished and Proposed Site Use

Alamo is proposing to make improvements to an existing concrete apron at a vehicle maintenance area to add storage tanks. Improvements are limited to constructing concrete curbs to provide secondary containment. No demolition is proposed or needed as part of the development.

Impervious Cover

The impervious cover of the site will not be increased or decreased as a result of the project. Concrete curbs are being installed on an existing concrete apron.

Permanent Best Management Practices (BMPs)

Alamo utilizes a number of Permanent BMPs which have been designed to prevent a release from entering the environment and the Edwards Aquifer in addition to being good business practices. These BMPs will include the following:

1) Practices and procedures to prevent and control a spill or overfill, including use of containment and drip pans;
2) Routine inspections and regular preventive maintenance of all mechanical systems which may result in leaks or spills; and
3) Practices, procedures, and employee training for responding to leaks, spills, and abnormal occurrences.

Modification of a Previously Approved Plan

Texas Commission on Environmental Quality

for Regulated Activities on the Edwards Aquifer Recharge Zone and Transition Zone and Relating to 30 TAC 213.4(j), Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This request for a **Modification of a Previously Approved Plan** is hereby submitted for TCEQ review and executive director approval. The request was prepared by:

Print Name of Customer/Agent: Steve McVey

Date: March 10, 2025

Signature of Customer/Agent:

Project Information

1. Current Regulated Entity Name: RN100220474
   Original Regulated Entity Name: Alamo Cement Company II, Ltd
   Regulated Entity Number(s) (RN): _____
   Edwards Aquifer Protection Program ID Number(s): 13-95041301/13-12022303
   ☒ The applicant has not changed and the Customer Number (CN) is: 600130637
   ☐ The applicant or Regulated Entity has changed. A new Core Data Form has been provided.

2. ☒ **Attachment A: Original Approval Letter and Approved Modification Letters.** A copy of the original approval letter and copies of any modification approval letters are attached.

3. A modification of a previously approved plan is requested for (check all that apply):
   - ☐ Physical or operational modification of any water pollution abatement structure(s) including but not limited to ponds, dams, berms, sewage treatment plants, and diversionary structures;
   - ☐ Change in the nature or character of the regulated activity from that which was originally approved or a change which would significantly impact the ability of the plan to prevent pollution of the Edwards Aquifer;
   - ☐ Development of land previously identified as undeveloped in the original water pollution abatement plan;
   - ☐ Physical modification of the approved organized sewage collection system;
   - ☐ Physical modification of the approved underground storage tank system;
   - ☒ Physical modification of the approved aboveground storage tank system.

4. ☒ Summary of Proposed Modifications (select plan type being modified). If the approved plan has been modified more than once, copy the appropriate table below, as necessary, and complete the information for each additional modification.

WPAP Modification Summary	***Approved Project***	***Proposed Modification***
Acres	_____	_____
Type of Development	_____	_____
Number of Residential Lots	_____	_____
Impervious Cover (acres)	_____	_____
Impervious Cover (%	_____	_____
Permanent BMPs	_____	_____
Other	_____	_____

SCS Modification Summary	***Approved Project***	***Proposed Modification***
Linear Feet	_____	_____
Pipe Diameter	_____	_____
Other	_____	_____

AST Modification Summary	***Approved Project***	***Proposed Modification***
Number of ASTs	5	7
Volume of ASTs	35,200-gal	13,800-gal
Other	_____	_____

UST Modification Summary	***Approved Project***	***Proposed Modification***
Number of USTs	_____	_____
Volume of USTs	_____	_____
Other	_____	_____

5. ☒ **Attachment B: Narrative of Proposed Modification**. A detailed narrative description of the nature of the proposed modification is attached. It discusses what was approved, including any previous modifications, and how this proposed modification will change the approved plan.

6. ☒ **Attachment C: Current Site Plan of the Approved Project**. A current site plan showing the existing site development (i.e., current site layout) at the time this application for modification is attached. A site plan detailing the changes proposed in the submitted modification is required elsewhere.
   - ☐ The approved construction has not commenced. The original approval letter and any subsequent modification approval letters are included as Attachment A to document that the approval has not expired.
   - ☒ The approved construction has commenced and has been completed. Attachment C illustrates that the site was constructed as approved.
   - ☐ The approved construction has commenced and has been completed. Attachment C illustrates that the site was **not** constructed as approved.
   - ☐ The approved construction has commenced and has **not** been completed. Attachment C illustrates that, thus far, the site was constructed as approved.
   - ☐ The approved construction has commenced and has **not** been completed. Attachment C illustrates that, thus far, the site was **not** constructed as approved.

7. ☐ The acreage of the approved plan has increased. A Geologic Assessment has been provided for the new acreage.
   ☒ Acreage has not been added to or removed from the approved plan.

8. ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

ATTACHMENT A – ORIGINAL APPROVAL LETTER AND APPROVED MODIFICATION LETTER

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 17, 1995

Mr. George Garcia
Alamo Cement
P.O. Box 34807
San Antonio, Texas 78265

Re: Edwards Aquifer, Bexar County.
PROJECT NAME: Alamo Cement Fuel Tanks Containment, Located on Green Mountain Rd ≈ 1 mile N of 1604, San Antonio, Texas.
PLAN TYPE: Request for Approval of Aboveground Storage Tank (AST) Facility Construction Plans and Specifications; 30 Texas Administrative Code (TAC) Section 313.11; Edwards Aquifer Protection Program.

Dear Mr. Garcia:

The Texas Natural Resource Conservation Commission (TNRCC) has completed its review of the plans and specifications for the referenced project that were submitted by Alamo Cement and received by the San Antonio Regional Office on April 13, 1995. Additional material was received on May 15, 1995.

The project site is located on the Edwards Aquifer Transition Zone. A site inspection was conducted by a field investigator from the San Antonio Regional Office on May 15, 1995, to document the condition at the site and to verify information provided.

PROJECT DESCRIPTION

The AST facilities consist of four (4) existing steel tanks located at two (2) different locations at the Alamo Cement facility. Tank Site 1 has one (1) 8000-gallon diesel tank and one (1) 8000-gallon gasoline tank, yielding a total site storage capacity of 16,000 gallons. Tank Site 2 has one (1) 8,000-gallon diesel tank and one (1) 1000-gallon oil tank, yielding a total site storage capacity of 9,000 gallons.

The AST's at Tank Site 1 are to be contained within a controlled drainage containment area with inside dimensions of 35 feet in length by 35 feet in width by 3 feet in depth, yielding a total containment which is greater than 150% of the total storage capacity of the facility. The AST's at Tank Site 2 are to be contained within a controlled drainage containment area with inside dimensions of 25 feet in length by 25 feet in width by 3.5 feet in

depth, yielding a total containment of greater than 150% of the total storage capacity of the facility.

The reinforced concrete structures shall be coated with a penetrating epoxy sealant specified in the plans (Shelcote II Epoxy manufactured by Cook Heavy Duty Protective Coatings) and applied in accordance with the manufacturer's recommendations.

The containment areas will be covered to prevent stormwater accumulation during rainfall events. In the event of a release or an accumulation of contaminated stormwater, the contaminated areas shall be cleaned and all contaminated fluids shall be disposed of in accordance with TNRCC requirements.

APPROVAL

The plan for this AST facility has been reviewed for compliance with 30 TAC Section 313.11 which sets forth pollution abatement criteria for such facilities located on the recharge and transition zones of the Edwards Aquifer. The proposed pollution abatement activities are in general agreement with 30 TAC Section 313.11, and approval of the proposed facility is hereby granted with the specific conditions listed below.

Failure to comply with any of the following conditions or any other specific conditions of approval is a violation of these rules. Pursuant to Section 26.136 of the Texas Water Code, violations of these rules may result in administrative penalties of up to $10,000 for each act of violation and for each day of violation.

SPECIAL CONDITIONS

1. In the event of a release or an accumulation of contaminated stormwater, contaminated soil and fluids may be used to replace a portion of the kiln feed material under the conditions outlined in the TNRCC Permit Alteration letter dated March 9, 1995, for Permit No. 6758/PSD-TX-145M1.

STANDARD CONDITIONS

1. For projects on the recharge zone all temporary erosion and sedimentation (E&S) controls shall be installed prior to all other construction at the site. (1) **Silt fences** should be used when the drainage area is less than 2 acres and the slope is less than 10%. (2) **Rock berms with filtration** should be used when the drainage areas are greater than two acres or when the slopes are in excess of 10%. The bottom edge of the filter fabric must be buried a minimum of 6 inches below grade.

2. The TNRCC may monitor stormwater discharges from the site to evaluate the adequacy of the temporary erosion and sedimentation control measures. Additional protection may be necessary if excessive solids are being discharged from the site.

3. **A copy of any local construction permit should be submitted to San Antonio Regional Office within 30 days of the issuance of this approval.**

4. Prior to commencing construction, the applicant shall submit any modifications to this approved AST facility required by some other regulating authority or desired by the applicant. To amend this approval, copies of any changes to the plans and specifications shall be submitted to this office and all other permitting authorities. **As indicated in 30 TAC Section 313.4 and 30 TAC Section 313.27, an application to amend any approved regulated activity shall include payment of appropriate fees and all information necessary for its review and Executive Director approval.**

5. All contractors conducting regulated activities associated with this proposed regulated development shall be provided with copies of this approval letter and the entire contents of the submitted AST Plans & Specifications so as to convey to the contractors the specific conditions of approval. During the course of regulated activities, the contractors shall be required to keep on-site copies of the AST Plans and this approval letter.

6. **Pursuant to 30 TAC Section 313.4(d)(1), prior to commencing construction, the applicant must notify the San Antonio Regional Office when the regulated activity will commence.**

7. 30 TAC Section 313.4(d)(2) requires that if any significant recharge features, such as solution openings or sinkholes, are discovered during construction or core sampling, all regulated activities near the significant recharge feature must be immediately suspended and may not proceed until the Executive Director has reviewed and approved the methods proposed to protect the aquifer from any potential adverse impacts. Upon discovery of the significant recharge features, the developer shall immediately notify the San Antonio Regional Office.

8. During the life of the aboveground storage tank facility, the owner/developer shall comply with all applicable provisions of 30 TAC Section 313.11. Additionally, the applicant, Alamo Cement, shall remain responsible for the provisions and special conditions of this approval until such responsibility

is legally transferred to another person or entity, upon which that person or entity shall assume all responsibility for provisions and specific conditions of this approval.

9. An "as-built" site plan for the facility shall be drawn to scale and in sufficient detail to depict the specific locations and dimensions of all major components of the storage system. A copy of such "as-built" site plan and construction drawings, as well as operating instructions for all major system components shall be maintained in a secure location at the site of the proposed facility. This information shall be available for examination by TNRCC personnel.

10. The owner of the proposed facility shall assure that the storage tank system is installed, operated, and maintained in full compliance with the applicable provisions of 30 TAC Section 313.11 and 30 TAC Chapter 334, and all local, state, and federal regulations.

11. A release contingency training program shall be established for on-site personnel, in addition to release detection equipment training seminars. Simple instructions, outlining the employee's responsibilities in the event of a release, shall be located in an area which is readily accessible to employees at all times.

12. Documentation of continuing training on leak detection equipment shall be maintained on-site.

13. It is recommended that signage be permanently posted and maintained in good condition at each fuel dispenser and tank fill tube which reminds users they are on the Recharge Zone of the Edwards Aquifer.

If you have any questions, please contact Julie Rogers at the San Antonio Regional Office, (210) 490-3096.

Sincerely,

J. Richard Garcia,
Regional Manager, for

Dan Pearson,
Executive Director

JRG-JPR/jpr

cc: Rebecca Cedillo, San Antonio Water System
Ray Rendon, P.E., Bexar County Environmental Engineer
Rick Illgner, Edwards Underground Water District
TNRCC - San Antonio Regional Office - Program File
TNRCC - Central Records (with attachment)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 18, 2012

Mr. Larry Alexander
Alamo Cement Company
PO Box 34807
San Antonio, Texas 78256-4807

Re: Edwards Aquifer, Bexar County

Name of Project: Alamo Cement Company; Located at 6055 West Green Mountain Road, approximately 0.5 miles north of Loop 1604; San Antonio, Texas

Type of Plan: Request for Modification of an Approved Aboveground Storage Tank Facility (AST); 30 Texas Administrative Code (TAC) Chapter 213 Edwards Aquifer

Edwards Aquifer Protection Program San Antonio File No. 46.01; Investigation No. 993889; Regulated Entity No. RN100220474

Dear Mr. Alexander:

The Texas Commission on Environmental Quality (TCEQ) has completed its review of the AST Modification for the above-referenced project submitted to the San Antonio Regional Office on February 23, 2012. Final review of the AST was completed after additional material was received on May 2, 2012 and May 16, 2012. As presented to the TCEQ, the AST Facility Plan proposed in the application was prepared to be in general compliance with the requirements of 30 TAC §213.5(e). Therefore, based on the applicant's concurrence of compliance, the planning materials for construction of the proposed project and pollution abatement measures are hereby approved subject to applicable state rules and the conditions in this approval letter. The applicant or a person affected may file with the chief clerk a motion for reconsideration of the executive director's final action on this Edwards Aquifer protection plan. A motion for reconsideration must be filed no later than 23 days after the date of this approval letter. *This approval expires two (2) years from the date of this letter unless, prior to the expiration date, more than 10 percent of the construction has commenced on the project or an extension of time has been requested.*

Background

The above referenced facility was previously approved by letter dated July 17, 1995 for the installation of four aboveground storage tanks located within two secondary containment areas. The containment areas and ASTs are summarized in the table below.

Containment Area	AST	Gallons	Tank Material	Contents of Tank
1	1	8,000	Steel	Diesel
	2	8,000	Steel	Gasoline
2	3	8,000	Steel	Diesel
	4	1,000	Steel	Oil
	Total	25,000		

Project Description

The project site is located on the Edwards Aquifer Transition Zone. The proposed AST Facility Plan will place an additional AST within the active quarry area. The AST is summarized in the table below.

AST	Gallons	Tank Material	Contents of Tank
5	10,000	Steel	Diesel
Total	10,000		

Equivalent Protection

The described AST is double walled steel tank (UL 142, Imperial Tank). The tank consists of a primary tank within a sealed secondary tank. The outer tank dimensions will be 8.25 feet in diameter and 27.6 feet in length. The two tanks are separated by approximately 3 inches of empty space. The interstitial area between the two tanks will contain any product leaks from the primary tank. An earthen berm will be placed around the AST as additional BMP.

All piping, hoses and dispensers will extend outside the containment structure. Piping will be aboveground and will connect to the dispenser located in front of the tank. Spill and overfill control for each tank and piping structures will be provided by supervised fuel transfers conducted by the delivery driver and an authorized person from the facility. The fuel level will be monitored throughout the refueling process. All ASTs, including piping, hoses and dispensers will be subject to regular inspections by operating personnel. Drips pans and other appropriate containment devices will be located at the hose connections and filler nozzles. In addition, any spills or releases will be controlled and contained by the above mentioned earthen

berm. Any stormwater accumulating inside the containment structure/earthen berm must be disposed of through an authorized waste disposal contractor.

The planned spill response that will take place at the facility is provided in Attachment "E" (enclosed) of the AST Facility Plan Application (Response Actions to Spills). In the event of a release or an accumulation of contaminated stormwater, the contained stormwater will be disposed of in accordance with TCEQ requirements.

Geology

According to the geologic assessment included with the application, the majority of the site is located on the Buda Limestone with two small outcrops of Austin Chalk. Three geologic and two man-made features were reported, none of which were assessed as sensitive. The San Antonio Regional Office did not conduct a site assessment.

Special Conditions

1. This modification is subject to all Special and Standard Conditions listed in the AST approval letter dated July 17, 1995.

Standard Conditions

1. Pursuant to Chapter 7 Subchapter C of the Texas Water Code, any violations of the requirements in 30 TAC Chapter 213 may result in administrative penalties.

2. The holder of the approved Edwards Aquifer protection plan must comply with all provisions of 30 TAC Chapter 213 and all best management practices and measures contained in the approved plan. Additional and separate approvals, permits, registrations and/or authorizations from other TCEQ Programs (i.e., Stormwater, Water Rights, UIC, PST) can be required depending on the specifics of the plan.

3. In addition to the rules of the Commission, the applicant may also be required to comply with state and local ordinances and regulations providing for the protection of water quality.

Prior to Commencement of Construction:

4. Within 60 days of receiving written approval of an Edwards Aquifer Protection Plan, the applicant must submit to the San Antonio Regional Office, proof of recordation of notice in the county deed records, with the volume and page number(s) of the county deed records of the county in which the property is located. A description of the property boundaries shall be included in the deed recordation in the county deed records. A suggested form (Deed Recordation Affidavit, TCEQ-0625) that you may use to deed record the approved AST Facility Plan is enclosed.

5. All contractors conducting regulated activities at the referenced project location shall be provided a copy of this notice of approval. At least one complete copy of the approved AST Facility Plan and this notice of approval shall be maintained at the project location until all regulated activities are completed.

6. Prior to commencing construction, the applicant shall submit any modifications to this approved AST Facility Plan required by some other regulating authority or desired by the applicant.

7. Modification to the activities described in the referenced AST Facility Plan, including Attachment "E" of the AST Facility Plan application (Response Actions to Spills), following the date of approval may require the submittal of an Edwards Aquifer Protection Plan application to modify this approval. The payment of appropriate fees and all information necessary must be provided for its review and approval prior to initiating construction of the modifications.

8. The applicant must provide written notification of intent to commence construction, replacement, or rehabilitation of the referenced project. Notification must be submitted to the San Antonio Regional Office no later than 48 hours prior to commencement of the regulated activity. Written notification must include the date on which the regulated activity will commence, the name of the approved plan and program ID number for the regulated activity, and the name of the prime contractor with the name and telephone number of the contact person. The executive director will use the notification to determine if the approved plan is eligible for an extension.

9. Temporary erosion and sedimentation (E&S) controls, i.e., silt fences, rock berms, stabilized construction entrances, or other controls described in the approved AST Facility Plan, must be installed prior to construction and maintained during construction. Temporary E&S controls may be removed when vegetation is established and the construction area is stabilized. The TCEQ may monitor stormwater discharges from the site to evaluate the adequacy of temporary E&S control measures. Additional controls may be necessary if excessive solids are being discharged from the site.

10. All borings with depths greater than or equal to 20 feet must be plugged with a non-shrink grout from the bottom of the hole to within three (3) feet of the surface. The remainder of the hole must be backfilled with cuttings from the boring. All borings less than 20 feet must be backfilled with cuttings from the boring. All borings must be backfilled or plugged within four (4) days of completion of the drilling operation. Voids may be filled with gravel.

During Construction:

11. During the course of regulated activities related to this project, the applicant or agent shall comply with all applicable provisions of 30 TAC Chapter 213, Edwards Aquifer. The applicant shall remain responsible for the provisions and conditions of this approval until such responsibility is legally transferred to another person or entity.

12. If any sensitive feature (caves, solution cavities, sink holes, etc.) is discovered during construction, all regulated activities near the feature must be suspended immediately. The applicant or his agent must immediately notify the San Antonio Regional Office of the discovery of the feature. Regulated activities near the feature may not proceed until the executive director has reviewed and approved the methods proposed to protect the feature and the aquifer from potentially adverse impacts to water quality. The plan must be sealed, signed, and dated by a Texas Licensed Professional Engineer.

13. Three wells exists on site. All water wells, including injection, dewatering, and monitoring wells must be in compliance with the requirements of the Texas Department of Licensing and Regulation under Title 16 TAC Chapter 76 (relating to Water Well Drillers and Pump Installers) and all other locally applicable rules, as appropriate.

14. If sediment escapes the construction site, the sediment must be removed at a frequency sufficient to minimize offsite impacts to water quality (e.g., fugitive sediment in street being washed into surface streams or sensitive features by the next rain). Sediment must be removed from sediment traps or sedimentation ponds not later than when design capacity has been reduced by 50 percent. Litter, construction debris, and construction chemicals shall be prevented from becoming stormwater discharge pollutants.

15. Intentional discharges of sediment laden storm water are not allowed. If dewatering becomes necessary, the discharge will be filtered through appropriately selected best management practices. These may include vegetated filter strips, sediment traps, rock berms, silt fence rings, etc.

16. The following records shall be maintained and made available to the executive director upon request: the dates when major grading activities occur, the dates when construction activities temporarily or permanently cease on a portion of the site, and the dates when stabilization measures are initiated.

17. Stabilization measures shall be initiated as soon as practicable in portions of the site where construction activities have temporarily or permanently ceased, and construction activities will not resume within 21 days. When the initiation of stabilization measures by the 14th day is precluded by weather conditions, stabilization measures shall be initiated as soon as practicable.

After Completion of Construction:

18. Attachment "E" of the AST Facility Plan application (Response Actions to Spills) shall be located on-site (copy enclosed).

19. In the event of a spill, any spillage will be drained and/or removed from the containment structure within 24 hours of the spill and disposed of properly. The applicant must comply with 30 TAC Chapter 334, Subchapter D, pertaining to Release Reporting and Corrective Action.

20. During the life of the AST facility, the owner shall comply with all applicable provisions of 30 TAC §213.5(e). Additionally, the owner, Alamo Cement Company shall remain responsible for the provisions and conditions of this approval until such responsibility is legally transferred to another person or entity, upon which that person or entity shall assume all responsibility for provisions and specific conditions of this approval.

21. An "as-built" site plan for the facility shall be drawn to scale and in sufficient detail to depict the specific locations and dimensions of all major components of the storage system. A copy of such "as-built" site plan and construction drawings, as well as operating instructions for all major system components shall be maintained in a secure location at the site of the proposed facility. This information shall be available for examination by TCEQ personnel upon request.

If you have any questions or require additional information, please contact Mr. Javier Anguiano of the Edwards Aquifer Protection Program of the San Antonio Regional Office at (210) 490-3096.

Sincerely,

Zak Covar, Executive Director
Texas Commission on Environmental Quality

ZC/JA/eg

Enclosures: Deed Recordation Affidavit, Form TCEQ-0625
Attachment "E" of AST Facility Plan application (Response Actions to Spills)

cc: Mr. Scott Halty, San Antonio Water System
Ms. Renee Green, P.E., Bexar County Public Works
Mr. Karl Dreher, Edwards Aquifer Authority
Mr. George Wissmann, Trinity Glen Rose Groundwater Conservation District
TCEQ Central Records, Building F, MC 212

ATTACHMENT E

Response Action Plan

Alamo Cement Company has a Spill Prevention, Control and Countermeasures Plan (SPCC) in place to address spill prevention and control. The following text is an excerpt from that plan which is reviewed and updated every five years or when changes are made, whichever comes first. This text applies to both tanks and drums or other equipment containing oil. For purposes of this AST Facility Plan, only those portions regarding fuel tank storage are applicable. A full copy of the plan is available for review at the facility.

§112.7(a)(5) Spill response procedures:

The information and procedures to be used in the event of a discharge have been consolidated and organized in Appendix III "Discharge Notification and Response Procedures" of this Plan in order to make the information readily available to management and responders. The Appendix material may be copied and distributed to personnel as standalone operational procedures.

DISCHARGE IDENTIFICATION

Discharges of or exceeding 25 gallons that are not contained within the tanks double wall secondary containment and reach land will be considered an emergency. These types of discharges will be responded to immediately and in accordance with this document. Spills smaller than 25 gallons in size or which are fully contained inside of a spill containment structure will not be considered an emergency, but will be cleaned up promptly. The causes of minor spills will be corrected in the same manner as the finding of an inspection, in accordance with the provisions of this Plan.

SPILL RESPONSE COORDINATOR

This SPCC Plan requires the designation of a Spill Response Coordinator who directs all activities associated with cleanup of discharges of 25 gallons or more in size, whether inside or outside of containment structures. The Discharge Response Coordinator is also responsible for the overall implementation of this SPCC Plan. Alamo Cement has designated the Plant Manager as the Spill Response Coordinator as well as the Environmental & Safety Manager as the Assistant Response Coordinator to ensure the round-the-clock availability of a coordinator.

Upon detection of a potentially reportable or emergency spill or discharge, the employee will immediately notify his/her supervisor and the Spill Coordinator on duty. In the event of a spill or discharge which does not result in the accumulation of a pumpable quantity of free liquid, the following procedures will be implemented. First, an effort will be made to stop the release by shutting off the affected equipment, system or subsystem. Then, releases outside of secondary containment structures will be immediately impounded and contained with temporary earthen berms using shovels and earth-moving equipment readily available on-site. Absorbent materials, such as clay, sand, kitty litter, raw mix, or additional soil, will be used on any free liquid. Once spill or discharge movement is stopped, steel dumpsters or roll-off containers will be used to hold all contaminated materials. Surrounding soils or materials will be excavated and containerized as necessary to ensure all oil-contaminated media in the area of the spill or discharge has been removed. In the event of smaller releases, 55-gallon steel drums or totes will be used to hold the contaminated materials.

Large spills with significant accumulation of pumpable free liquid occurring in secondary containment, drainage structures or the retention pond will be impounded with flexible booms or earthen berms/sorbent materials, and then removed by pumping to containers or tank trucks, including contaminated water resulting from the spill.

As necessary, containers, equipment and piping will be taken out of service, the oil removed and stored in appropriate containers as necessary until repairs, replacement, reconstruction or other corrective action can be completed. If indicated, aboveground containers will be evaluated for brittle fracture and other catastrophic failure, and corrective action taken. The appropriate supervisor and the Response Coordinator on duty will authorize the return to service of any container, piping, or equipment taken out of service due to a spill or discharge.

DISPOSAL PROCEDURES

The collected and containerized solid materials will be sampled and tested for classification under the TCEQ's Solid and Industrial Waste Classification System. If the contaminated materials test below 1400 ppm of Total Petroleum Hydrocarbons (TPH), the material will be classified as a Class II non-hazardous solid waste, and will be transported to a Class II non-hazardous landfill. If the TPH exceeds those levels, the material will be manifested as a Class I non-hazardous solid waste and shipped off-site for recycling (oil recovery/separation/fuel blending) as appropriate, or for disposal in a permitted landfill through a qualified waste handling contractor.

The liquid waste will be sampled and classified as above, manifested, and shipped off-site for recycling (oil recovery/separation/fuel blending) or disposal in a permitted incinerator through a qualified waste handling contractor. As appropriate, residual oil contamination in the retention pond may be bioremediated to assure compliance with TPDES discharge limits.

CONTAINMENT DRAINAGE PROCEDURES

Records indicating the need for corrective action relating to drainage of accumulated precipitation will be addressed within 24 hours of discovery. Action taken will give consideration to any recent vessel leaks or other potential causes of contamination as well as to the likelihood of additional precipitation in the immediate future.

Should the evaluating supervisor suspect contamination, not immediately visible upon inspection, a sample will be collected and tested for Total Petroleum Hydrocarbons (TPH). Data regarding potential contamination will be recorded on the appropriate inspection form. Should no contamination be visibly apparent, suspected, or found via analysis, any accumulated water will be released outside the secondary containment.

In accordance with EPA regulations regarding discharge of oil, no water with a film, sheen, or discoloration upon the surface, or which contains a sludge or emulsion, will be released from secondary containment systems at any time. Water suspected of possible contamination will not be discharged without laboratory screening. Water with visible oil contamination or that has been affirmed through laboratory analyses as being contaminated, will be pumped from the secondary containment and into appropriate containers for proper recycling or disposal.

RESPONSE MATERIALS CLEANUP AND INVENTORY

After a spill or discharge response event, the Spill Response Coordinator will ensure the cleanup of all tools, utensils, booms, protective clothing, brooms, shovels, and other equipment in order to remove residual oil and to return them to service. In addition, the Coordinator will conduct a review of the inventory of spill response and cleanup equipment and supplies and ensure the timely replacement of expended items sufficient to provide an adequate response to future events.

DISCHARGE EVENT REVIEW

Following a spill or discharge event, the Spill Response Coordinator will schedule and conduct an event review meeting with appropriate personnel in order to discuss the cause of the discharge, the response taken, and any system or subsystem failures. Any changes in preventative measures, operational or maintenance activities which might significantly minimize future spills or discharges will be explored, as well as any deficiencies in the discharge response procedures. The Coordinator will report any findings and recommendations to facility management and, if necessary, the SPCC Plan will be amended to incorporate the findings of this evaluation.

AGENCY NOTIFICATIONS AND REPORTING

The Spill Response Coordinator will ensure that discharge notification has been made to the appropriate agencies within the specified time frames as specified by this Plan, and will ensure that the required information has been provided. Any spill 25 gallons or greater will be reported to TCEQ within 24 hours of discharge. In addition, the Coordinator will ensure that all subsequent discharge reports are submitted to the specified Agencies in full and in a timely manner, and that documentation of discharge notification and reporting are retained with the SPCC Plan for three (3) years.

ATTACHMENT B – NARRATIVE OF PROPOSED MODIFICATION

Alamo is proposing a modification to the existing approved AST Facility Plan to add storage capacity to the existing Vehicle Maintenance Area. This modification will add storage capacity of diesel, used oil, and lubrication oil within appropriate secondary containment. One AST used to store liquid ammonium hydroxide is being included as part of this modification. There was considerable debate regarding the applicability of ammonium hydroxide under the Edwards Aquifer Protection Program.

The proposed modification includes the addition of four 500-gallon tanks, one 600-gallon tank, and one 1,200-gallon tank at the Vehicle Maintenance Area. The combined storage capacity of these six tanks is 3,800 gallons. The required secondary containment for the new storage at the Vehicle Maintenance Area is 5,700 gallons.

This modification also includes the addition of one 10,000-gallon tank currently storing ammonium hydroxide. The capacity of the secondary containment is 23,740 gallons.

The new tanks are listed in bold in the table below along with the tanks in the previously approved and once modified AST Plan.

Table 1 Summary of AST Systems at Alamo Cement Plant

Secondary Containment No.	Tank Number	Contents	Capacity (gallon)	Status of Authorization
1 (Vehicle Fueling Area)	1	Diesel	8,000	Approved in the 1995 AST Plan
	2	Gasoline	8,000	Approved in the 1995 AST Plan
2 (Quarry Tank Farm)	3	Diesel	8,000	Approved in the 1995 AST Plan
	4	Motor Oil	1,200	Approved in the 1995 AST Plan
3 (North Quarry)	5	Diesel	10,000	Approved in 2012 AST Plan Modification
4 (Vehicle Maintenance Area)	6	Diesel	500	**Submitted as part of this modification**
	7	Used Oil	600	**Submitted as part of this modification**
	8	Oil	500	**Submitted as part of this modification**
	9	Lube Oil	500	**Submitted as part of this modification**
	10	Lube Oil	500	**Submitted as part of this modification**
	11	Lube Oil	1,200	**Submitted as part of this modification**
Ammonia Storage	12	Ammonium Hydroxide	10,000	**Submitted as part of this modification**

ATTACHMENT C – CURRENT SITE PLAN OF THE APPROVED PROJECT

ALAMO CEMENT COMPANY

TCEQ-0590

ATTACHMENT C - CURRENT SITE PLAN OF APPROVED AST FACILITY PLAN

BEXAR COUNTY, TEXAS

Double-walled Diesel Tank - 10,000 gallons

QUARRY

CLINKER DOME 2

COAL STORAGE

FUTURE CLINKER DOME 3

VEHICLE FUELING TANK FARM

COVERED RAW MATERIAL STORAGE AREA

POND

Gasoline Tank - 8,000 gallons
Diesel Tank - 8,000 gallons

CLINKER DOME 1

PRODUCTION SHED (BRICK)

COAL HOUSE

BONEYARD

AMMONIUM HYDROXIDE

CLINKER SILO

COAL MILL

PREHEATER TOWER

KILN

CLINKER COOLER

FINISH MILL 1

PRODUCTION SHED

FINISH MILL 2

MAINTENANCE AREA

FABRICATION SHOP

MAIN OFFICES

RAW MILL 1

OIL DISPENSE HOUSE

VISITOR PARKING

RAW MILL 2

Motor Oil Tank - 1,200 gallons
Diesel Tank - 8,000 gallons

BONEYARD

LIMESTONE BUILDING

GREEN MOUNTAIN

QUARRY TANK FARM

PACK HOUSE

ALAMO WATER WELL #3

PARKING SPOT FOR FUEL TRUCK

SILOS

PARKING SPOT FOR FUEL TRUCK

SHALE BUILDING

ALAMO WATER WELL #2

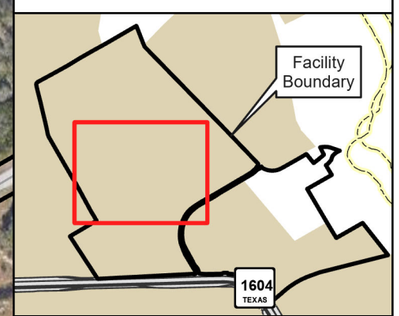
LIMESTONE STOCKPILES

COVERED RAW MATERIAL STORAGE AREA

ALAMO WATER WELL #1

Legend

- Approved Tank Location
- Groundwater Well
- Surface Flow Direction



0 400 800

Feet

POWER ENGINEERS

Date: 3/14/2025

Path: G:\Projects\0252331_AlamoCement\Apps\PRO\0252331_BuzziUnicem_AlamoCementPlan_Modifications.aprx

Aboveground Storage Tank Facility Plan Application

Texas Commission on Environmental Quality

For Permanent Storage on The Edwards Aquifer Recharge and Transition Zones And Relating to 30 TAC §213.5(e), Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **Aboveground Storage Tank Facility Plan Application** is hereby submitted for TCEQ review and Executive Director approval. The application was prepared by:

Print Name of Customer/Agent: Steve McVey

Date: March 10, 2025

Signature of Customer/Agent:

Regulated Entity Name: Alamo Cement Company II, Ltd.

Aboveground Storage Tank (AST) Facility Information

1. Tanks and substance stored:

Table 1 - Tank and Substance Storage

AST Number	*Size (Gallons)*	*Substance to be Stored*	*Tank Material*
1	See attached Table 1		
2			
3			
4			

AST Number	*Size (Gallons)*	*Substance to be Stored*	*Tank Material*
5			

Total x 1.5 = _____ Gallons

2. ☒ The AST will be placed within a containment structure that is sized to capture one and one-half (1 1/2) times the storage capacity of the system. For facilities with more than one tank system, the containment structure is sized to capture one and one-half (1 1/2) times the cumulative storage capacity of all systems.

   ☐ **Attachment A - Alternative Methods of Secondary Containment**. Alternative methods for providing secondary containment are proposed. Specifications that show equivalent protection for the Edwards Aquifer are attached.

3. Inside dimensions and capacity of containment structure(s):

Table 2 - Secondary Containment

Length (L) (Ft.)	*Width (W) (Ft.)*	*Height (H) (Ft.)*	*L x W x H = (Ft3)*	*Gallons*
See attached Table 2				

Total: _____ Gallons

4. ☒ All piping, hoses, and dispensers will be located inside the containment structure.

   ☐ Some of the piping to dispensers or equipment will extend outside the containment structure.
   - ☐ The piping will be aboveground
   - ☐ The piping will be underground

5. ☐ The containment area must be constructed of and in a material impervious to the substance(s) being stored. The proposed containment structure will be constructed of _____.

6. ☒ **Attachment B - Scaled Drawing(s) of Containment Structure**. A scaled drawing of the containment structure that shows the following is attached:

   - ☒ Interior dimensions (length, width, depth and wall and floor thickness).
   - ☒ Internal drainage to a point convenient for the collection of any spillage.
   - ☒ Tanks clearly labeled.
   - ☒ Piping clearly labeled.
   - ☒ Dispenser clearly labeled.

Site Plan Requirements

Items 7 - 18 must be included on the Site Plan.

7. ☐ The Site Plan must have a minimum scale of 1" = 400'.

   Site Plan Scale: 1" = 400'.

8. 100-year floodplain boundaries:

   ☐ Some part(s) of the project site is located within the 100-year floodplain. The floodplain is shown and labeled.
   ☒ No part of the project site is located within the 100-year floodplain.

   ☐ The 100-year floodplain boundaries are based on the following specific (including date of material) sources(s): _____.

9. ☐ The layout of the development is shown with existing and finished contours at appropriate, but not greater than ten-foot contour intervals. Show lots, recreation centers, buildings, roads, etc.

   ☐ The layout of the development is shown with existing contours. Finished topographic contours will not differ from the existing topographic configuration and are not shown.

10. All known wells (oil, water, unplugged, capped and/or abandoned, test holes, etc.):

    ☒ There are 3 (#) wells present on the project site and the locations are shown and labeled. (Check all of the following that apply):
    ☐ The wells are not in use and have been properly abandoned.
    ☐ The wells are not in use and will be properly abandoned.
    ☒ The wells are in use and comply with 16 TAC § 76.

    ☐ There are no wells or test holes of any kind known to exist on the project site.

11. Geologic or manmade features which are on the site:

    ☐ All sensitive geologic or manmade features identified in the Geologic Assessment are shown and labeled.
    ☐ No sensitive geologic or manmade features were identified in the Geologic Assessment.
    ☒ **Attachment C - Exception to the Geologic Assessment**. A request and justification for an exception to a portion of the Geologic Assessment is attached.

12. ☐ The drainage patterns and approximate slopes anticipated after major grading activities.

13. ☐ Areas of soil disturbance and areas which will not be disturbed.

14. ☐ Locations of major structural and nonstructural controls. These are the temporary and permanent best management practices.

15. ☐ Locations where soil stabilization practices are expected to occur.

16. ☒ Surface waters (including wetlands).

    ☐ N/A

17. ☐ Locations where stormwater discharges to surface water or sensitive features.

    ☒ There will be no discharges to surface water or sensitive features.

18. ☒ Legal boundaries of the site are shown.

Best Management Practices

19. ☒ Any spills must be directed to a point convenient for collection and recovery. Spills from storage tank facilities must be removed from the controlled drainage area for disposal within 24 hours of the spill.

    ☒ In the event of a spill, any spillage will be removed from the containment structure within 24 hours of the spill and disposed of properly.

    ☐ In the event of a spill, any spillage will be drained from the containment structure through a drain and valve within 24 hours of the spill and disposed of properly. The drain and valve system are shown in detail on the scaled drawing.

20. ☒ All stormwater accumulating inside the containment structure will be disposed of through an authorized waste disposal contractor.

    ☒ Containment area will be covered by a roof.

    ☐ Containment area will not be covered by a roof.

    ☐ A description of the alternate method of stormwater disposal is submitted for the executive director's review and approval and is attached.

21. ☒ **Attachment D - Spill and Overfill Control**. A site-specific description of the methods to be used at the facility for spill and overfill control is attached.

22. ☒ **Attachment E - Response Actions to Spills**. A site-specific description of the planned response actions to spills that will take place at the facility is attached.

Administrative Information

23. A Water Pollution Abatement Plan (WPAP) is required for construction of any associated commercial, industrial or residential project located on the Recharge Zone.

    ☐ The WPAP application for this project was approved by letter dated _____. A copy of the approval letter is attached at the end of this application.

    ☐ The WPAP application for this project was submitted to the TCEQ on _____, but has not been approved.

    ☐ A WPAP application is required for an associated project, but it has not been submitted.

☒ There will be no building or structure associated with this project. In the event a building or structure is needed in the future, the required WPAP will be submitted to the TCEQ.

☐ The proposed AST is located on the Transition Zone and a WPAP is not required. Information requested in 30 TAC 213.5 subsection (b) (4)(B) and (C) and (5) is provided with this application. (Forms TCEQ-0600 Permanent Stormwater Section and TCEQ-0602 Temporary Stormwater Section or Stormwater Pollution Prevention Plan/SW3P).

24. ☐ This facility is subject to the requirements for the reporting and cleanup of surface spills and overfills pursuant to 30 TAC 334 Subchapter D relating to Release Reporting and Corrective Action.

25. ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

26. ☐ Any modification of this AST Facility Plan application will require executive director approval, prior to construction, and may require submission of a revised application, with appropriate fees.

Table 1 – Tank and Substances Stored

Containment Name	AST Number	Size (Gallons)	Substance to be Stored	Tank Material
Vehicle Maintenance Area	6	500	Diesel	Steel
	7	600	Used Oil	Steel
	8	500	Oil	Steel
	9	500	Motor Oil	Steel
	10	500	Oil	Steel
	11	1,200	Motor Oil	Steel
Total Gallons Stored		3,800		
				Total x 1.5 = 5,700
Ammonia Storage	12	10,000	Ammonia Hydroxide	Steel
Total Gallons Stored		10,000		
				Total x 1.5 = 15,000

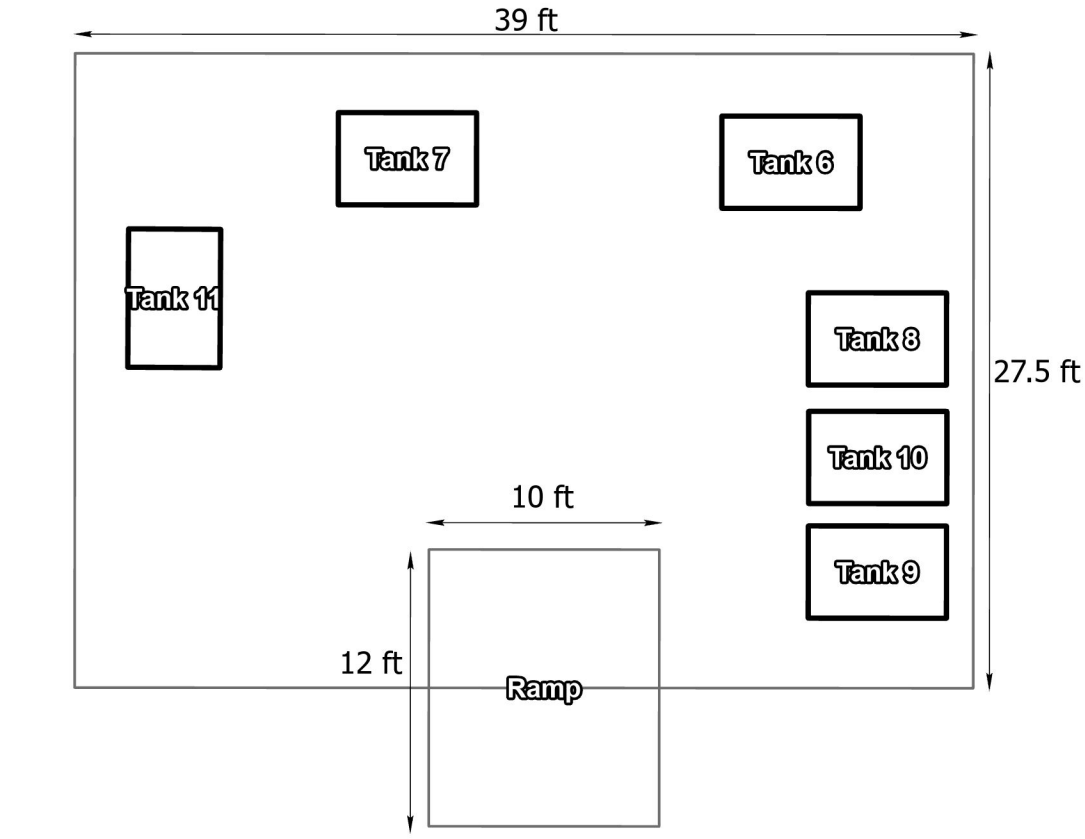
Table 2 – Secondary Containment

Length (L) (ft)	Width (W) (Ft)	Height (H) (Ft)	LxWxH=(Ft^3)	Gallons
Vehicle Maintenance Area – 3,800 gal				
27.5	39.0	0.92	986.7	7,380.5
				Total: 7,381 Gallons
Ammonia – 10,000 gal				
28.0	38.0	3.0	3,192.0	23,876
				Total: 23,876 Gallons

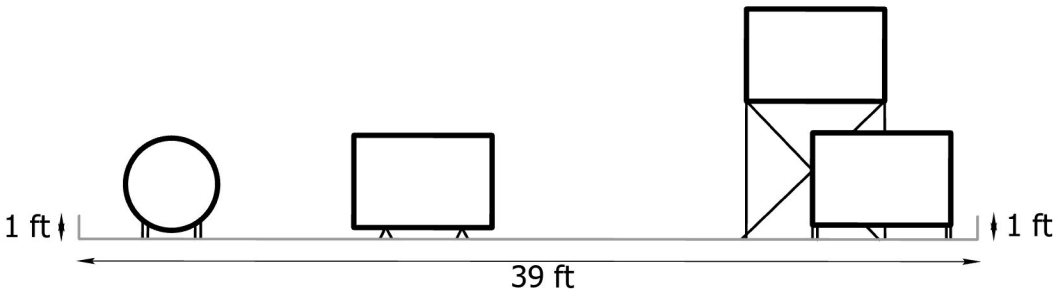
ATTACHMENT A – ALTERNATIVE METHODS OF SECONDARY CONTAINMENT

NOT APPLICABLE

ATTACHMENT B – SCALED DRAWINGS OF CONTAINMENT STRUCTURES



PLAN VIEW



PROFILE VIEW

0 5 10 20 Feet

TANK ID	Capacity (gal)	Contents	Tank Construction
6	500	Diesel	Single Wall Steel
7	600	Used Oil	Single Wall Steel
8	500	Oil	Single Wall Steel
9	500	Motor Oil	Single Wall Steel
10	500	Oil	Single Wall Steel
11	1200	Motor Oil	Single Wall Steel

ALAMO CEMENT CO
TCEQ-0575

ATTACHMENT B
SCALED CONTAINMENT DRAWING

VEHICLE MAINTENANCE AREA

BEXAR COUNTY, TEXAS

POWER ENGINEERS
MEMBER OF WSP

Date: 3/17/2025

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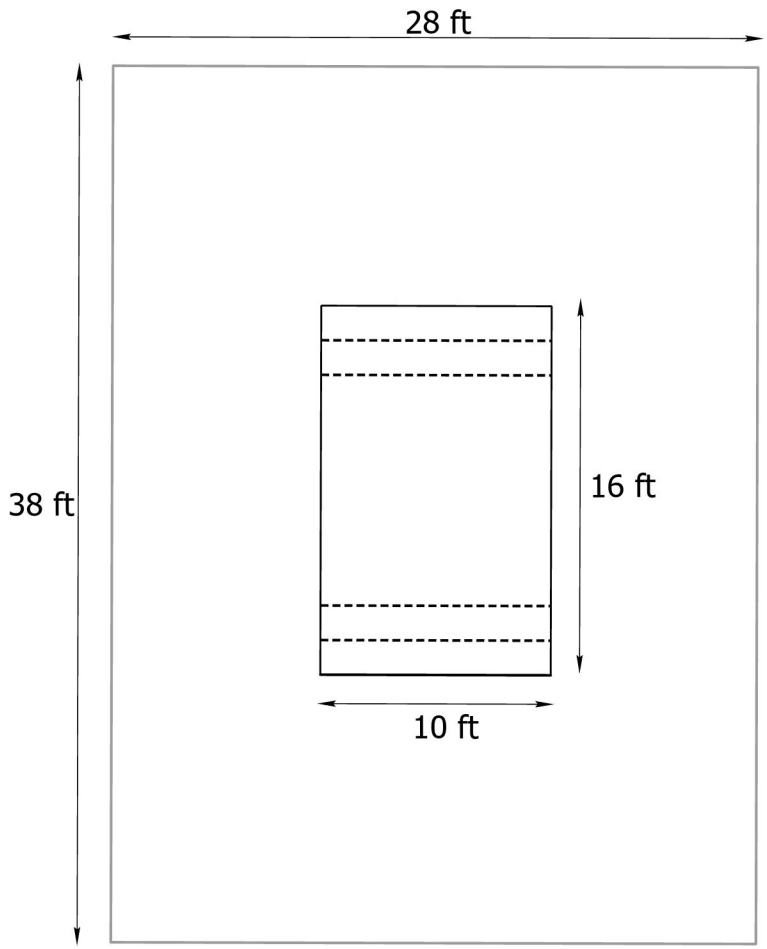
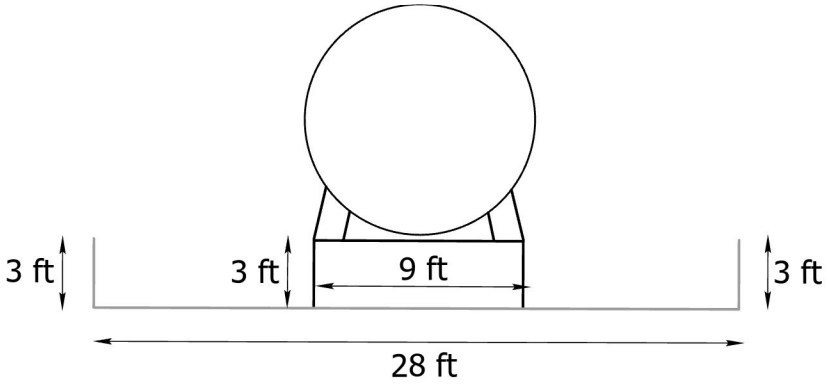


PLAN VIEW



PROFILE VIEW

0 5 10 20 Feet

Tank ID	Capacity (gal)	Contents	Tank Construction
12	10000	Ammonium Hydroxide	Single Wall Steel

ALAMO CEMENT CO
TCEQ-0575

ATTACHMENT B
SCALED CONTAINMENT DRAWING

AMMONIUM HYDROXIDE STORAGE

BEXAR COUNTY, TEXAS

POWER ENGINEERS
MEMBER OF WSP

Date: 3/17/2025

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ALAMO CEMENT COMPANY
TCEQ-0757

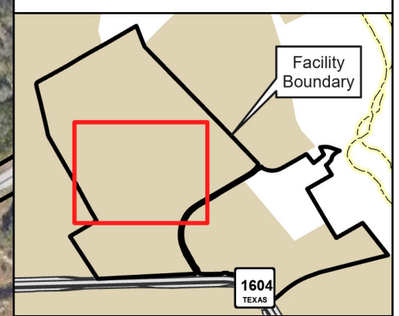
MODIFICATION OF APPROVED SITE PLAN

BEXAR COUNTY, TEXAS

Double-walled Diesel Tank - 10,000 gallons
QUARRY
CLINKER DOME 2
COAL STORAGE
FUTURE CLINKER DOME 3
VEHICLE FUELING TANK FARM
COVERED RAW MATERIAL STORAGE AREA
POND
Gasoline Tank - 8,000 gallons
Diesel Tank - 8,000 gallons
CLINKER DOME 1
PRODUCTION SHED (BRICK)
COAL HOUSE
AMMONIUM HYDROXIDE
CLINKER SILO
BONEYARD
PREHEATER TOWER
COAL MILL
KILN
CLINKER COOLER
FINISH MILL 1
FINISH MILL 2
Used Oil Tank - 600 gallons
Diesel Tank - 500 gallons
Oil-50 Tank - 500 gallons
Oil-SAE 30 W Tank - 500 gallons
Oil Tank - 500 gallons
Motor Oil Tank - 1,200 gallons
PRODUCTION SHED
MAINTENANCE AREA
FABRICATION SHOP
MAIN OFFICES
RAW MILL 1
OIL DISPENSE HOUSE
VISITOR PARKING
RAW MILL 2
Motor Oil Tank - 1,200 gallons
Diesel Tank - 8,000 gallons
BONEYARD
LIMESTONE BUILDING
GREEN MOUNTAIN
QUARRY TANK FARM
PACK HOUSE
ALAMO WATER WELL #3
PARKING SPOT FOR FUEL TRUCK
SILOS
PARKING SPOT FOR FUEL TRUCK
SHALE BUILDING
ALAMO WATER WELL #2
LIMESTONE STOCKPILES
COVERED RAW MATERIAL STORAGE AREA
ALAMO WATER WELL #1

Legend

- Approved Tank Location
- Additional Tank Location
- Groundwater Well
- Surface Flow Direction



0 400 800
Feet

POWER ENGINEERS

Date: 3/14/2025

Path: G:\Projects\0252331_AlamoCement\Apps\PRO\0252331_BuzziUnicem_AlamoCementPlan_Modifications.aprx

ATTACHMENT C – EXCEPTION TO THE GEOLOGIC ASSESSMENT

Alamo respectfully requests an exception to conducting a Geologic Assessment due to the absence of any ground disturbing activity. The modification involves the installation of concrete curbs to form secondary containment at an existing concrete slab located at the Vehicle Maintenance building. The modification will also include an existing 10,000-gal storage tank and its associated secondary containment.

ATTACHMENT D – SPILL AND OVERFILL CONTROL

Alamo has a Spill Prevention, Control and Countermeasures Plan (SPCC) in place to address spill prevention and control. The following text is an excerpt from that plan which is reviewed and updated every five years or when changes are made, whichever comes first This text applies to both tanks and drums or other equipment containing oil. For purposes of this AST application, only the text below regarding tanks is applicable. A full copy of the plan is available for review at the facility.

§112.7(a)(3)(ii) Discharge prevention measures and procedures:

Tank truck loading and unloading:

Prior to filling and departure of any tank truck, the lowermost drain and all outlets of such vehicles are closely examined for leakage, and if necessary, tightened, adjusted, or replaced to prevent liquid leakage while in transit. During offloading, the tanker driver and a company representative are present. The tanker diver remains in contact with shutoff controls and the company representative positions him/herself to observe any signs of leakage or other problems.

Storage Tanks and Other Containers:

Aboveground tanks and containers, such as 55-gallon drums, are subject to periodic visual inspection. Tank supports and foundations are included in these inspections. In addition, the outside of the tanks and other containers are frequently observed by operating personnel for signs of deterioration, leaks, and accumulation of oil. All aboveground tanks and containers of 55-gallon capacity or more are subject to monthly inspections.

Tank installations should, as far as practical, be fail-safe engineered or updated into a fail-safe engineered installation to avoid spills. Tank installations are protected from traffic, equipped with secondary containment and equipped with shut-off valves closely mounted to the tank. All 55-gallon drums are also placed in or on secondary containment in order to facilitate inspection and spill control. Lids and caps on containers are kept closed when not in use.

Visible oil leaks from containers, tank seams, gaskets, rivets, and bolts which are sufficiently large to cause the accumulation of oil are promptly noted during inspections and corrected. All visible oil leaks that might cause an accumulation of oil are noted during the monthly inspections, recorded, and reported for corrective action. The inspections require follow-up on deficiencies noted and the date of correction recorded.

Facility Transfers. Pumping. and Process Units:

There are no buried piping installations or above-ground pipelines for petroleum products at the Alamo Cement Plant.

All aboveground valves and piping are subject to regular examinations by operating personnel at which time the general condition of items, such as flange joints, valve glands and bodies, catch pans, locking of valves, and metal surfaces should be assessed. All of the piping is

located so that a failure would not result in an uncontrolled spill. All aboveground valves and pipes are inspected monthly.

There is no above-ground piping in vehicular pathways at the Alamo Cement Plant.

§112.7(a)(3)(iii) Discharge or drainage controls and discharge control procedures:

Various containment and diversionary structures designed to prevent discharged oil from reaching a navigable water course are provided. The controls include the facility's drainage system of berms, ditches, culverts, and guttering which will divert oil into the retention pond for spills that escape secondary containment, as well as concrete structures (secondary containment) with retaining walls and/or curbing to capture spills, and an ample supply of readily available sorbent materials for Impounding and collecting any spills. These various discharge and drainage controls are discussed in detail in Section §112.7(c). Discharge control procedures consist of impoundment of spills outside containment as necessary, application of sorbent materials to spills, and removal of contaminated materials to containers for subsequent disposal in accordance with applicable regulations. Discharge controls for small spills inside secondary containment consist of application of sorbent materials and removal of contaminated materials to containers for disposal as above. Large spills in containment may be removed by pumping to containers or tank trucks, including any contaminated water in secondary containment or the retention pond, followed by disposal based on the waste classification and applicable recycling and/or disposal regulations. Detailed discharge control procedures are discussed in section §112.7(c) below and also in Appendix III "Discharge Notification and Response Procedures" of this Plan.

§112.7(a)(3)(iv) Countermeasures:

Countermeasures employed by the facility for discharge discovery, response and cleanup include the following:

1) Routine container, equipment and piping inspections;
2) Routine secondary containment inspections;
3) Oil-handling employee and supervisor training in discharge detection, response and cleanup;
4) Oil-handling employee and supervisor training in the provisions and procedures of the SPCC Plan;
5) Appointment of Discharge Response Coordinator(s) familiar with SPCC Plan provisions and procedures;
6) Maintenance of discharge response equipment and supplies; and
7) Access to qualified contractors for removal and disposal of oil spills and contaminated materials.

ATTACHMENT E – RESPONSE ACTION TO SPILLS

Alamo has a Spill Prevention, Control and Countermeasures Plan (SPCC) in place to address spill prevention and control. The following text is an excerpt from that plan which is reviewed and updated every five years or when changes are made, whichever comes first. This text applies to both tanks and drums or other equipment containing oil. For purposes of this AST Facility Plan, only those portions regarding fuel tank storage are applicable. A full copy of the plan is available for review at the facility.

§112.7(a)(5) Spill response procedures:

The information and procedures to be used in the event of a discharge have been consolidated and organized in Appendix III "Discharge Notification and Response Procedures" of this Plan in order to make the information readily available to management and responders. The Appendix material may be copied and distributed to personnel as standalone operational procedures.

Discharge Identification

Discharges of or exceeding 25 gallons that are not contained within the tanks double wall secondary containment and reach land will be considered an emergency. These types of discharges will be responded to immediately and in accordance with this document Spills smaller than 25 gallons in size or which are fully contained inside of a spill containment structure will not be considered an emergency but will be cleaned up promptly. The causes of minor spills will be corrected in the same manner as the finding of an inspection, in accordance with the provisions of this Plan.

Spill Response Coordinator

This SPCC Plan requires the designation of a Spill Response Coordinator who directs all activities associated with cleanup of discharges of 25 gallons or more in size, whether inside or outside of containment structures. The Discharge Response Coordinator is also responsible for the overall implementation of this SPCC Plan. Alamo Cement has designated the Plant Manager as the Spill Response Coordinator as well as the Environmental & Safety Manager as the Assistant Response Coordinator to ensure the round-the-clock availability of a coordinator.

Upon detection of a potentially reportable or emergency spill or discharge, the employee will immediately notify his/her supervisor and the Spill Coordinator on duty. In the event of a spill or discharge which does not result in the accumulation of a pumpable quantity of free liquid, the following procedures will be implemented. First, an effort will be made to stop the release by shutting off the affected equipment, system or subsystem. Then, releases outside of secondary containment structures will be immediately impounded and contained with temporary earthen berms using shovels and earth-moving equipment readily available on-site. Absorbent materials, such as clay, sand, kitty litter, raw mix, or additional soil, will be used on any free liquid. Once spill or discharge movement is stopped, steel dumpsters or roll-off containers will be used to hold all contaminated materials. Surrounding soils or materials will be excavated and containerized as necessary to ensure all oil-contaminated media in the area of the spill or

discharge has been removed. In the event of smaller releases, 55-gallon steel drums or totes will be used to hold the contaminated materials.

Large spills with significant accumulation of pumpable free liquid occurring in secondary containment, drainage structures or the retention pond will be impounded with flexible booms or earthen berms/sorbent materials, and then removed by pumping to containers or tank trucks, including contaminated water resulting from the spill.

As necessary, containers, equipment and piping will be taken out of service, the oil removed and stored in appropriate containers as necessary until repairs, replacement, reconstruction or other corrective action can be completed. If indicated, aboveground containers will be evaluated for brittle fracture and other catastrophic failure, and corrective action taken. The appropriate supervisor and the Response Coordinator on duty will authorize the return to service of any container, piping, or equipment taken out of service due to a spill or discharge.

Disposal Procedures

The collected and containerized solid materials will be sampled and tested for classification under the TCEQ's Solid and Industrial Waste Classification System. If the contaminated materials test below 1400 ppm of Total Petroleum Hydrocarbons (TPH), the material will be classified as a Class II non-hazardous solid waste and will be transported to a Class II non-hazardous landfill. If the TPH exceeds those levels, the material will be manifested as a Class I non-hazardous solid waste and shipped off-site for recycling (oil recovery/separation/fuel blending) as appropriate, or for disposal in a permitted landfill through a qualified waste handling contractor.

The liquid waste will be sampled and classified as above, manifested, and shipped off-site for recycling (oil recovery/separation/fuel blending) or disposal in a permitted incinerator through a qualified waste handling contractor. As appropriate, residual oil contamination in the retention pond may be bioremediated to assure compliance with TPDES discharge limits.

Containment Drainage Procedures

Records indicating the need for corrective action relating to drainage of accumulated precipitation will be addressed within 24 hours of discovery. Action taken will give consideration to any recent vessel leaks or other potential causes of contamination as well as to the likelihood of additional precipitation in the immediate future.

Should the evaluating supervisor suspect contamination, not immediately visible upon inspection, a sample will be collected and tested for Total Petroleum Hydrocarbons (TPH). Data regarding potential contamination will be recorded on the appropriate inspection form. Should no contamination be visibly apparent, suspected, or found *via* analysis, any accumulated water will be released outside the secondary containment.

In accordance with EPA regulations regarding discharge of oil, no water with a film, sheen, or discoloration upon the surface, or which contains a sludge or emulsion, will be released from secondary containment systems at any time. Water suspected of possible contamination will not be discharged without laboratory screening. Water with visible oil contamination or that has been affirmed through laboratory analyses as being contaminated, will be pumped from the secondary containment and into appropriate containers for proper recycling or disposal.

Response Materials Cleanup and Inventory

After a spill or discharge response event, the Spill Response Coordinator will ensure the cleanup of all tools, utensils, booms, protective clothing, brooms, shovels, and other equipment in order to remove residual oil and to return them to service. In addition, the Coordinator will conduct a review of the inventory of spill response and cleanup equipment and supplies and ensure the timely replacement of expended items sufficient to provide an adequate response to future events.

Discharge Event Review

Following a spill or discharge event, the Spill Response Coordinator will schedule and conduct an event review meeting with appropriate personnel in order to discuss the cause of the discharge, the response taken, and any system or subsystem failures. Any changes in preventative measures, operational or maintenance activities which might significantly minimize future spills or discharges will be explored, as well as any deficiencies in the discharge response procedures. The Coordinator will report any findings and recommendations to facility management and, if necessary, the SPCC Plan will be amended to incorporate the findings of this evaluation.

Agency Notifications and Reporting

The Spill Response Coordinator will ensure that discharge notification has been made to the appropriate agencies within the specified time frames as specified by this Plan and will ensure that the required information has been provided. Any spill 25 gallons or greater will be reported to TCEQ within 24 hours of discharge. In addition, the Coordinator will ensure that all subsequent discharge reports are submitted to the specified Agencies in full and in a timely manner, and that documentation of discharge notification and reporting are retained with the SPCC Plan for three (3) years.

Temporary Stormwater Section

Texas Commission on Environmental Quality

for Regulated Activities on the Edwards Aquifer Recharge Zone and Relating to 30 TAC §213.5(b)(4)(A), (B), (D)(I) and (G); Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

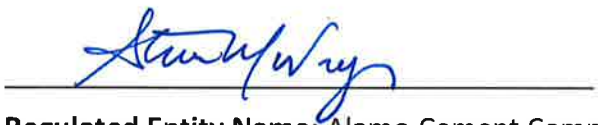
Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **Temporary Stormwater Section** is hereby submitted for TCEQ review and executive director approval. The application was prepared by:

Print Name of Customer/Agent: Steve McVey

Date: April 15, 2025

Signature of Customer/Agent:



Regulated Entity Name: Alamo Cement Company II, Ltd

Project Information

Potential Sources of Contamination

Examples: Fuel storage and use, chemical storage and use, use of asphaltic products, construction vehicles tracking onto public roads, and existing solid waste.

1. Fuels for construction equipment and hazardous substances which will be used during construction:

   ☐ The following fuels and/or hazardous substances will be stored on the site: _____

   These fuels and/or hazardous substances will be stored in:

   ☐ Aboveground storage tanks with a cumulative storage capacity of less than 250 gallons will be stored on the site for less than one (1) year.

☐ Aboveground storage tanks with a cumulative storage capacity between 250 gallons and 499 gallons will be stored on the site for less than one (1) year.

☐ Aboveground storage tanks with a cumulative storage capacity of 500 gallons or more will be stored on the site. An Aboveground Storage Tank Facility Plan application must be submitted to the appropriate regional office of the TCEQ prior to moving the tanks onto the project.

☒ Fuels and hazardous substances will not be stored on the site.

2. ☐ **Attachment A - Spill Response Actions**. A site specific description of the measures to be taken to contain any spill of hydrocarbons or hazardous substances is attached.

3. ☐ Temporary aboveground storage tank systems of 250 gallons or more cumulative storage capacity must be located a minimum horizontal distance of 150 feet from any domestic, industrial, irrigation, or public water supply well, or other sensitive feature.

4. ☐ **Attachment B - Potential Sources of Contamination**. A description of any activities or processes which may be a potential source of contamination affecting surface water quality is attached.

Sequence of Construction

5. ☐ **Attachment C - Sequence of Major Activities**. A description of the sequence of major activities which will disturb soils for major portions of the site (grubbing, excavation, grading, utilities, and infrastructure installation) is attached.

   ☐ For each activity described, an estimate (in acres) of the total area of the site to be disturbed by each activity is given.

   ☐ For each activity described, include a description of appropriate temporary control measures and the general timing (or sequence) during the construction process that the measures will be implemented.

6. ☐ Name the receiving water(s) at or near the site which will be disturbed or which will receive discharges from disturbed areas of the project: _____

Temporary Best Management Practices (TBMPs)

Erosion control examples: tree protection, interceptor swales, level spreaders, outlet stabilization, blankets or matting, mulch, and sod. Sediment control examples: stabilized construction exit, silt fence, filter dikes, rock berms, buffer strips, sediment traps, and sediment basins. Please refer to the Technical Guidance Manual for guidelines and specifications. All structural BMPs must be shown on the site plan.

7. ☐ **Attachment D – Temporary Best Management Practices and Measures**. TBMPs and measures will prevent pollution of surface water, groundwater, and stormwater. The construction-phase BMPs for erosion and sediment controls have been designed to retain sediment on site to the extent practicable. The following information is attached:

☐ A description of how BMPs and measures will prevent pollution of surface water, groundwater or stormwater that originates upgradient from the site and flows across the site.

☐ A description of how BMPs and measures will prevent pollution of surface water or groundwater that originates on-site or flows off site, including pollution caused by contaminated stormwater runoff from the site.

☐ A description of how BMPs and measures will prevent pollutants from entering surface streams, sensitive features, or the aquifer.

☐ A description of how, to the maximum extent practicable, BMPs and measures will maintain flow to naturally-occurring sensitive features identified in either the geologic assessment, TCEQ inspections, or during excavation, blasting, or construction.

8. ☐ The temporary sealing of a naturally-occurring sensitive feature which accepts recharge to the Edwards Aquifer as a temporary pollution abatement measure during active construction should be avoided.

☐ **Attachment E - Request to Temporarily Seal a Feature**. A request to temporarily seal a feature is attached. The request includes justification as to why no reasonable and practicable alternative exists for each feature.

☒ There will be no temporary sealing of naturally-occurring sensitive features on the site.

9. ☐ **Attachment F - Structural Practices**. A description of the structural practices that will be used to divert flows away from exposed soils, to store flows, or to otherwise limit runoff discharge of pollutants from exposed areas of the site is attached. Placement of structural practices in floodplains has been avoided.

10. ☐ **Attachment G - Drainage Area Map**. A drainage area map supporting the following requirements is attached:

☐ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a sediment basin will be provided.

☐ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a smaller sediment basin and/or sediment trap(s) will be used.

☐ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a sediment basin or other equivalent controls are not attainable, but other TBMPs and measures will be used in combination to protect down slope and side slope boundaries of the construction area.

☐ There are no areas greater than 10 acres within a common drainage area that will be disturbed at one time. A smaller sediment basin and/or sediment trap(s) will be used in combination with other erosion and sediment controls within each disturbed drainage area.

☐ There are no areas greater than 10 acres within a common drainage area that will be disturbed at one time. Erosion and sediment controls other than sediment basins or sediment traps within each disturbed drainage area will be used.

11. ☐ **Attachment H - Temporary Sediment Pond(s) Plans and Calculations**. Temporary sediment pond or basin construction plans and design calculations for a proposed temporary BMP or measure have been prepared by or under the direct supervision of a Texas Licensed Professional Engineer. All construction plans and design information must be signed, sealed, and dated by the Texas Licensed Professional Engineer. Construction plans for the proposed temporary BMPs and measures are attached.

☐ N/A

12. ☐ **Attachment I - Inspection and Maintenance for BMPs.** A plan for the inspection of each temporary BMP(s) and measure(s) and for their timely maintenance, repairs, and, if necessary, retrofit is attached. A description of the documentation procedures, recordkeeping practices, and inspection frequency are included in the plan and are specific to the site and/or BMP.

13. ☐ All control measures must be properly selected, installed, and maintained in accordance with the manufacturer's specifications and good engineering practices. If periodic inspections by the applicant or the executive director, or other information indicate a control has been used inappropriately, or incorrectly, the applicant must replace or modify the control for site situations.

14. ☐ If sediment escapes the construction site, off-site accumulations of sediment must be removed at a frequency sufficient to minimize offsite impacts to water quality (e.g., fugitive sediment in street being washed into surface streams or sensitive features by the next rain).

15. ☐ Sediment must be removed from sediment traps or sedimentation ponds not later than when design capacity has been reduced by 50%. A permanent stake will be provided that can indicate when the sediment occupies 50% of the basin volume.

16. ☐ Litter, construction debris, and construction chemicals exposed to stormwater shall be prevented from becoming a pollutant source for stormwater discharges (e.g., screening outfalls, picked up daily).

Soil Stabilization Practices

Examples: establishment of temporary vegetation, establishment of permanent vegetation, mulching, geotextiles, sod stabilization, vegetative buffer strips, protection of trees, or preservation of mature vegetation.

17. ☐ **Attachment J - Schedule of Interim and Permanent Soil Stabilization Practices**. A schedule of the interim and permanent soil stabilization practices for the site is attached.

18. ☐ Records must be kept at the site of the dates when major grading activities occur, the dates when construction activities temporarily or permanently cease on a portion of the site, and the dates when stabilization measures are initiated.

19. ☐ Stabilization practices must be initiated as soon as practicable where construction activities have temporarily or permanently ceased.

Administrative Information

20. ☐ All structural controls will be inspected and maintained according to the submitted and approved operation and maintenance plan for the project.

21. ☐ If any geologic or manmade features, such as caves, faults, sinkholes, etc., are discovered, all regulated activities near the feature will be immediately suspended. The appropriate TCEQ Regional Office shall be immediately notified. Regulated activities must cease and not continue until the TCEQ has reviewed and approved the methods proposed to protect the aquifer from any adverse impacts.

22. ☐ Silt fences, diversion berms, and other temporary erosion and sediment controls will be constructed and maintained as appropriate to prevent pollutants from entering sensitive features discovered during construction.

TEMPORARY STORMWATER SECTION

Not applicable – This modification of a previously approved AST Facility Plan will not require any land disturbing activities and therefore construction-phase temporary BMPs are not applicable .

TCEQ Temporary Stormwater Form 0602 is intentionally left blank.

Agent Authorization Form
For Required Signature
Edwards Aquifer Protection Program
Relating to 30 TAC Chapter 213
Effective June 1, 1999

I Jorge A. Espinosa,
Print Name

Plant Manager - Alamo Cement,
Title - Owner/President/Other

of Alamo Cement Company,
Corporation/Partnership/Entity Name

have authorized Steve McVey
Print Name of Agent/Engineer

of POWER Engineers, Inc.
Print Name of Firm

to represent and act on the behalf of the above named Corporation, Partnership, or Entity for the purpose of preparing and submitting this plan application to the Texas Commission on Environmental Quality (TCEQ) for the review and approval consideration of regulated activities.

I also understand that:

1. The applicant is responsible for compliance with 30 Texas Administrative Code Chapter 213 and any condition of the TCEQ's approval letter. The TCEQ is authorized to assess administrative penalties of up to $10,000 per day per violation.

2. For those submitting an application who are not the property owner, but who have the right to control and possess the property, additional authorization is required from the owner.

3. Application fees are due and payable at the time the application is submitted. The application fee must be sent to the TCEQ cashier or to the appropriate regional office. The application will not be considered until the correct fee is received by the commission.

4. A notarized copy of the Agent Authorization Form must be provided for the person preparing the application, and this form must accompany the completed application.

5. No person shall commence any regulated activity on the Edwards Aquifer Recharge Zone, Contributing Zone or Transition Zone until the appropriate application for the activity has been filed with and approved by the Executive Director.

SIGNATURE PAGE:

Jorge Espinosa
Applicant's Signature

01-10-2025
Date

THE STATE OF Texas §

County of Bexar §

BEFORE ME, the undersigned authority, on this day personally appeared Jorge Espinosa known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that (s)he executed same for the purpose and consideration therein expressed.

GIVEN under my hand and seal of office on this 10 day of January, 2025.

Debbie Castillo
NOTARY PUBLIC

Debbie Castillo
Typed or Printed Name of Notary

DEBBIE CASTILLO
My Notary ID # 125048027
Expires September 9, 2028

MY COMMISSION EXPIRES: 9-9-2028

Application Fee Form

Texas Commission on Environmental Quality
Name of Proposed Regulated Entity: Alamo Cement Company
Regulated Entity Location: 6055 W. Green Mountain Road, San Antonio, Texas
Name of Customer: Alamo Cement Company II, Ltd
Contact Person: Jorge Espinosa Phone: 210-208-1930
Customer Reference Number (if issued):CN 600130637
Regulated Entity Reference Number (if issued):RN 100220474

Austin Regional Office (3373)

☐ Hays ☐ Travis ☐ Williamson

San Antonio Regional Office (3362)

☒ Bexar ☐ Medina ☐ Uvalde
☐ Comal ☐ Kinney

Application fees must be paid by check, certified check, or money order, payable to the **Texas Commission on Environmental Quality**. Your canceled check will serve as your receipt. **This form must be submitted with your fee payment.** This payment is being submitted to:

☐ Austin Regional Office
☐ Mailed to: TCEQ - Cashier
Revenues Section
Mail Code 214
P.O. Box 13088
Austin, TX 78711-3088

☒ San Antonio Regional Office
☐ Overnight Delivery to: TCEQ - Cashier
12100 Park 35 Circle
Building A, 3rd Floor
Austin, TX 78753
(512)239-0357

Site Location (Check All That Apply):

☐ Recharge Zone ☐ Contributing Zone ☒ Transition Zone

Type of Plan	*Size*	*Fee Due*
Water Pollution Abatement Plan, Contributing Zone Plan: One Single Family Residential Dwelling	Acres	$
Water Pollution Abatement Plan, Contributing Zone Plan: Multiple Single Family Residential and Parks	Acres	$
Water Pollution Abatement Plan, Contributing Zone Plan: Non-residential	Acres	$
Sewage Collection System	L.F.	$
Lift Stations without sewer lines	Acres	$
Underground or Aboveground Storage Tank Facility	7 Tanks	$ 4,550
Piping System(s)(only)	Each	$
Exception	Each	$
Extension of Time	Each	$

Signature: _____ Date: March 10, 2025

TCEQ-0574 (Rev. 02-24-15)

Application Fee Schedule

Texas Commission on Environmental Quality
Edwards Aquifer Protection Program 30 TAC Chapter 213 (effective 05/01/2008)

Water Pollution Abatement Plans and Modifications

Contributing Zone Plans and Modifications

Project	*Project Area in Acres*	*Fee*
One Single Family Residential Dwelling	< 5	$650
Multiple Single Family Residential and Parks	< 5 5 < 10 10 < 40 40 < 100 100 < 500 ≥ 500	$1,500 $3,000 $4,000 $6,500 $8,000 $10,000
Non-residential (Commercial, industrial, institutional, multi-family residential, schools, and other sites where regulated activities will occur)	< 1 1 < 5 5 < 10 10 < 40 40 < 100 ≥ 100	$3,000 $4,000 $5,000 $6,500 $8,000 $10,000

Organized Sewage Collection Systems and Modifications

Project	*Cost per Linear Foot*	*Minimum Fee-Maximum Fee*
Sewage Collection Systems	$0.50	$650 - $6,500

Underground and Aboveground Storage Tank System Facility Plans and Modifications

Project	*Cost per Tank or Piping System*	*Minimum Fee-Maximum Fee*
Underground and Aboveground Storage Tank Facility	$650	$650 - $6,500

Exception Requests

Project	*Fee*
Exception Request	$500

Extension of Time Requests

Project	*Fee*
Extension of Time Request	$150

TCEQ Use Only

TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission *(If other is checked please describe in space provided.)*

☐ New Permit, Registration or Authorization *(Core Data Form should be submitted with the program application.)*

☐ Renewal *(Core Data Form should be submitted with the renewal form)*

☒ Other **AST Facility Plan Modification**

2. Customer Reference Number *(if issued)*	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number *(if issued)*
CN 600130637		RN 10022047

SECTION II: Customer Information

4. General Customer Information | **5. Effective Date for Customer Information Updates** (mm/dd/yyyy)

☐ New Customer ☒ Update to Customer Information ☐ Change in Regulated Entity Ownership

☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)

The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).

6. Customer Legal Name *(If an individual, print last name first: eg: Doe, John)* — *If new Customer, enter previous Customer below:*

Alamo Cement Company II, Ltd.

7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number *(if applicable)*
7174210	17426896175	742047858	44063618

11. Type of Customer: ☐ Corporation ☐ Individual Partnership: ☐ General ☒ Limited

Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other ☐ Sole Proprietorship ☐ Other:

12. Number of Employees

☐ 0-20 ☐ 21-100 ☒ 101-250 ☐ 251-500 ☐ 501 and higher

13. Independently Owned and Operated?

☐ Yes ☒ No

14. Customer Role (Proposed or Actual) – *as it relates to the Regulated Entity listed on this form. Please check one of the following*

☐ Owner ☐ Operator ☒ Owner & Operator ☐ Other:

☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant

15. Mailing Address:

6055 W. Green Moutain Road

City	State	ZIP	ZIP + 4
San Antonio	TX	78266	1705

16. Country Mailing Information *(if outside USA)*	17. E-Mail Address *(if applicable)*
	jespinosa@alamocement.com

18. Telephone Number	19. Extension or Code	20. Fax Number *(if applicable)*

(210) 208-1930		(210) 208-1990

SECTION III: Regulated Entity Information

21. General Regulated Entity Information *(If 'New Regulated Entity" is selected, a new permit application is also required.)*

☐ New Regulated Entity ☐ Update to Regulated Entity Name ☐ Update to Regulated Entity Information

The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).

22. Regulated Entity Name *(Enter name of the site where the regulated action is taking place.)*

23. Street Address of the Regulated Entity: *(No PO Boxes)*								
	City		**State**		**ZIP**		**ZIP + 4**	
24. County								

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:					
26. Nearest City			**State**		**Nearest ZIP Code**

Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).

27. Latitude (N) In Decimal:			**28. Longitude (W) In Decimal:**		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds

29. Primary SIC Code (4 digits)	**30. Secondary SIC Code** (4 digits)	**31. Primary NAICS Code** (5 or 6 digits)	**32. Secondary NAICS Code** (5 or 6 digits)

33. What is the Primary Business of this entity? *(Do not repeat the SIC or NAICS description.)*

34. Mailing Address:								
	City		**State**		**ZIP**		**ZIP + 4**	
35. E-Mail Address:								

36. Telephone Number	**37. Extension or Code**	**38. Fax Number** *(if applicable)*
( ) -		( ) -

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

☐ Dam Safety	☐ Districts	☒ Edwards Aquifer	☒ Emissions Inventory Air	☒ Industrial Hazardous Waste
		13-12022303	BG0259G	TXD980339774
☐ Municipal Solid Waste	☐ New Source Review Air	☐ OSSF	☒ Petroleum Storage Tank	☐ PWS
			50536	
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Steve McVey	41. Title:	Project Manager
42. Telephone Number	**43. Ext./Code**	**44. Fax Number**	**45. E-Mail Address**
(512) 879-6625		( ) -	steve.mcvey@powereng.com

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Alamo Cement Company	Job Title:	Plant Manager	
Name *(In Print):*	Jorge Espinosa		**Phone:**	(210) 208- **1930**
Signature:	Jorge Espinosa		**Date:**	02-11-2025