March 15, 2013

Greg Knapp
Lehigh Hanson
Director Environmental Affairs, Region West
12667 Alcosta Blvd , San Ramon, CA 94583

Dear Greg,

The purpose of this letter is to describe a list of scheduled actions to be completed at the Lehigh Permanente Quarry to address the deficiencies noted by Kit Custis, County appointed inspector, on his February 28, 2013 site inspection.

Per Condition of Approval 78 (COA 78) of the Final Conditions of Approval, the Mine Operator shall implement stormwater and sediment management controls in addition to general BMPs required by the SWPPP in active and inactive reclamation areas throughout Phase I, II, and III of the RPA.

WRA has been actively managing the preparation for and implementation of BMP installations throughout the Reclamation Plan Amendment Area. To date, installations have occurred throughout the areas (see Submittal 6, November 29, 2012) in accordance with COA 78. Since those installations, regular inspections of the BMP's have been performed and deficiencies were noted and repairs made where necessary. BMP performance and repair reports are to be included with the 2013 Annual Report due in the fall of 2013.

Below, we provide a synopsis of the each of the items found to be deficient and describe the actions to be taken. An estimated schedule for correcting those deficiencies is also included. Please feel free to contact me with any questions or comments.

1. Determine whether an onsite rain gauge could be used to track storm events.

   WRA will determine whether an on-site rain gauge is functional and accessible. If the current gauge is not usable, nor repairable, the Cupertino weather station will be utilized. Per the Lehigh Permanente Quarry Reclamation Plan Amendment Final EIR (Page 4.10-46) an onsite rain measuring device is not required.

   In discussions with Chow Yip, it has been determined that an on-site rain gauge does exist and is access by Campbell Scientific LoggerNet Software. A computer with a modem (old-school) is required to communicate with it. WRA will work to obtain the necessary hardware and get software from Chow to access the onsite data. It is unclear why the onsite data has not been used thus far.

   This task is not mapped.

2. Silt fence needs minor repair, re-wiring to posts.

   WRA made the required repairs to the silt fence on March 12, 2013.These actions will be reported at a later date with photographic evidence.

   This task is not mapped.

3. Recommended placing straw bales at outfalls of mid-slope bench in Sub Area 2.

   WRA placed straw bales and straw wattle at the specific location on March 12, 2013 to prevent potential runoff. These actions will be reported at a later date with photographic evidence.

   This task is not mapped.

4. Cleanout and minor repair because of breakouts needed in some areas of the drainage ditches in EMSA.

   The drainage ditch along the haul road downstream from the C-Station ditches has broken out into the haul road and requires repair. Drainage ditch cleanout and repair will be performed by Coulter Gradeall. Coulter Gradeall is prepared to start work within a week of a Purchase Order confirmation and can complete the work within 10 working days. Non-limestone rock may be required and will be sourced from non-limestone overburden from the Permanente Quarry, or if that is not available, the material will be sourced from Steven's Creek Quarry. In addition, the culvert at the lower end of the ditch is filled with sediment and will require a clean out as well.

   This task is mapped.

5. Replacement of Pond 30 outfall rock with non-limestone is still required.

   Pond 30 outfall rock replacement will be replaced by Coulter Gradall. Coulter Gradall is prepared to start work within a week of a Purchase Order confirmation. Non-limestone rock may be required and will be sourced from non-limestone overburden from the Permanente Quarry, or if that is not available, the material will be sourced from Steven's Creek Quarry. Coulter Gradeall is prepared to start work within a week of a Purchase Order confirmation and can complete the work within 10 working days.

   This task is mapped.

6. BMPs such as ditch drains will likely be needed and repairs made before storm events to prevent run-on to stock piles.

   Ditch drains will be constructed where needed to prevent runoff from stockpiles. The stockpile identified by Mr. Custis is located on the haul road above the surge pile to control surge piles north of the haul road and west of the road leading to the EMSA. Permanente staff or Coulter Gradeall will construct these ditch drains within 10 working days weeks of Purchase Order issue.

   This task is mapped.

7. Sean proposed construction of a new sediment basin and ditch cleanout.

   A siltation basin will be constructed below C-Station to capture all the limestone-derived materials originating from the slope uphill. It is estimated that the sediment basin will have a 15 foot diameter bottom and slopes of 1:1 and a distance across the top of 45 feet in diameter giving a volume of at least 11,500 ft^3 to capture an estimated season's worth of sediment runoff. If the potential during construction exists to increase the volume exists, this will be considered. The outer berms will be constructed of non-limestone rock sourced from Steven's Creek Quarry. Coulter Gradeall will excavate the existing limestone-derived materials and place them on the haul road for Permanente Quarry personnel to remove and dispose of. Coulter Gradeall is prepared to start work within a week of a Purchase Order confirmation and can complete the work within 10 working days.

   This task is mapped.

8. Until construction of a new sediment basin, regular inspection and cleanout of the ditches will likely be needed.

   After the construction of a new sediment basin below C-Station (see item 7 above), the ditch leading from below C-Station to the culvert downstream will be cleaned and relined with non-limestone rock sourced from Steve's Creek Quarry. Regular inspection of the drainage ditches will be conducted as necessary by WRA. Coulter Gradeall is prepared to start work within a week of a Purchase Order confirmation and can complete the work within 10 working days.

   This task is mapped.

9. Further evaluation needed on feasibility of placing BMPs in Subarea 3 due to steep slopes and worker safety.

   Subarea 3 erosion controls will be installed per Mr. Cutis's recommendations of draping erosion control netting and hydroseeding where feasible. These actions will occur in the dry season during 2013 starting approximately in June 2013.

   This task is not mapped.

10. Subarea 7 possible BMPs include regular inspection of flumes for leakage and repair, placement of erosion controls at locations where leakage or concentrated runoff occurs.

    The current and future use of the water flume system in Subarea 7 will be determined by WRA and Permanente Quarry staff. If the flume system is used or connected to existing systems, regular inspection of the flume and adjacent hillsides will be conducted after each rainfall event as part of the erosion controls site inspection by WRA in accordance with the SWPPP Stormwater Best Management Practices and COA 78j.

    This task is mapped.

11. Siltation Basin SB-7 Cleanout

    Although not an identifiable deficiency, we propose to clean out Siltation Basin #7 southwest of the Aluminum Plant to avoid sediment runoff into aeas connected to

Permanente Creek. Coulter Gradeall cleaned this basin out at a prior time and said that it was filling. This basin receives water from the C-Station Ditches and is likely selenium-rich. It drains into the same depressions adjacent to the railroad tracks as the truck wash station does. Coulter Gradeall is prepared to start work within a week of a Purchase Order confirmation and can complete the work within 10 working days.

This task is mapped.

All the tasks above can be complete within three weeks of receiving a Purchase Order Confirmation

Lehigh Permanente and WRA as a consultant will continue to inspect BMP's and identify new areas that may require additional BMP's and erosion control measures. All actions will be reported in a Corrective Actions report and be included in the 2013 Annual Report

Sincerely,

Sean Avent, Scientist

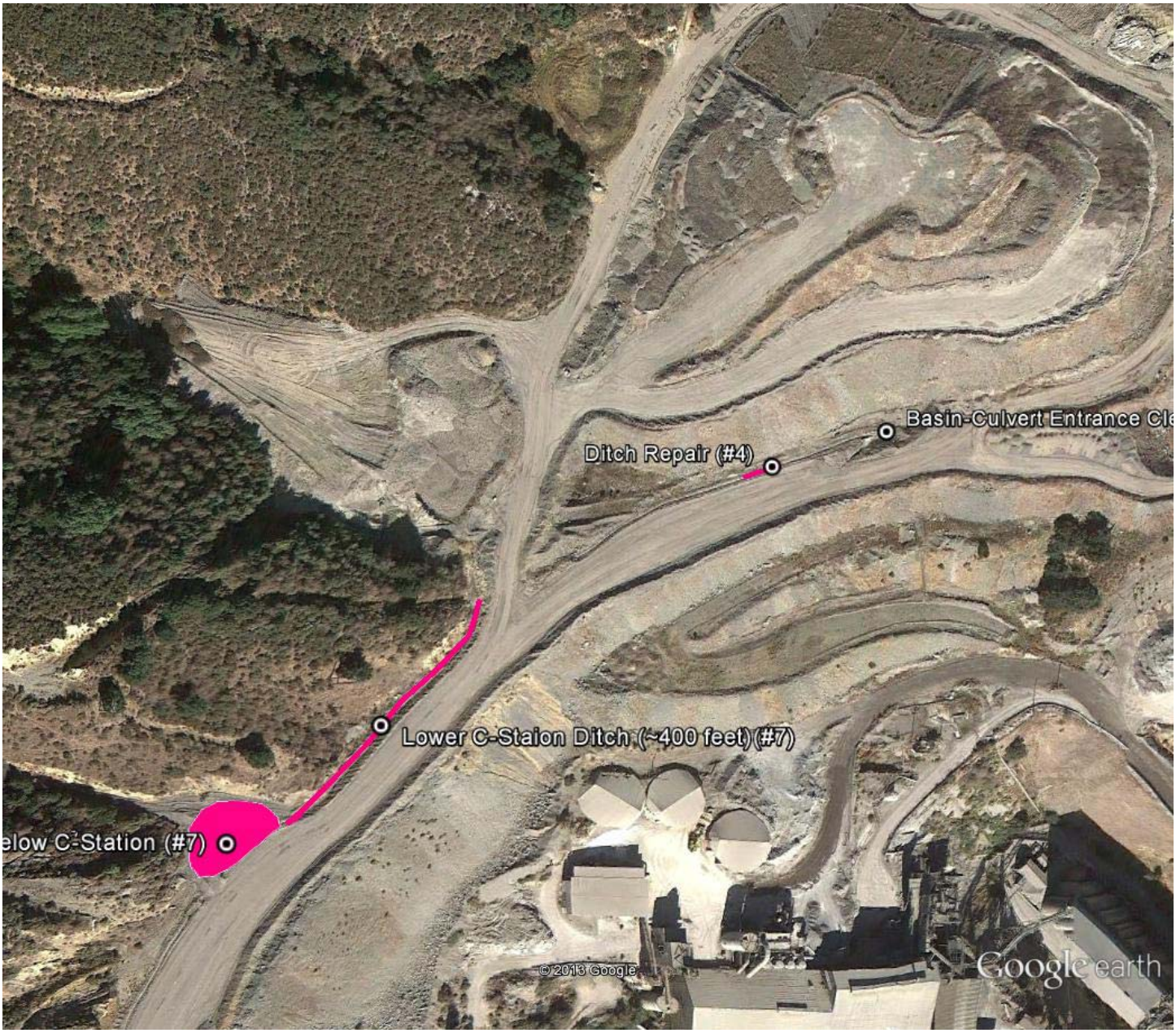
Google earth

feet 1000
meters 300

Google earth

feet 1000

meters 500



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