

May 22, 2013

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Ms. Dyan Whyte
Assistant Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

Re: *Submittal of Source Identification Work Plan – January 22, 2013 Water Code section 13267 Order, Order No. R2-2013-1005, Directive 13*

Dear Ms. Whyte:

Enclosed, pursuant to the Regional Water Quality Control Board, San Francisco Bay Region's, ("Regional Water Board") January 22, 2013 Water Code section 13267 Order, Order No. R2-2013-1005, ("Order"), as modified per the parties' discussions, Lehigh Southwest Cement Company ("Lehigh") timely encloses the requested Source Identification Work Plan in accordance with Directive 13 of the Order. If you or your staff have any questions regarding the enclosed Work Plan, or would like to discuss further, please do not hesitate to contact me or Greg Knapp at Lehigh.

Very truly yours,

Nicole E. Granquist

Nicole E. Granquist

Enclosure

Cc: Brian Thompson, Regional Water Quality Control Board, San Francisco Bay Region
Ellen Howard, Counsel, State Water Resources Control Board
Greg Knapp, Director Environmental Region West, Lehigh
Michael Hyer, General Counsel, Lehigh Hanson

Lehigh Southwest Cement Company
Permanente Plant

Source Identification Work Plan
Directive 13 – Water Code section 13267 Order
May 22, 2013

Introduction

In 2013, the San Francisco Bay Regional Water Quality Control Board (RWQCB) issued a 13267 Order requiring Lehigh to prepare a current inventory of chemicals onsite at the Permanente Plant. The requirement was stated as follows:

By May 22, 2013

Submit a work plan acceptable to the Assistant Executive Officer to inventory chemicals used on the site (by name and volume) and to identify all potential pollution sources, including chemical storage areas, sumps, underground tanks, utility lines, and related facilities. The work plan should specify investigation methods and a proposed time schedule.

Lehigh submits this Work Plan (WP) to address this requirement. The work performed pursuant to this WP will culminate in the submittal of a Source Identification Report, required by Directive 14 of the 13267 Order, which states as follows:

By October 22, 2013

Submit a technical report acceptable to the Assistant Executive Officer documenting completion of necessary tasks identified in the work plan to identify sources. The technical report should identify confirmed and possible sources of pollution.

Inventory of Onsite Chemicals and Storage Areas

Lehigh maintains updated Hazardous Material Business Plans pursuant to California and Federal regulation. These plans contain a precise inventory of hazardous material chemicals used and stored onsite, which includes volumes and locations of these chemicals. Lehigh also maintains an updated Spill Prevention Control and Countermeasure (SPCC) plan pursuant to the Clean Water Act which identifies onsite volumes of hydrocarbon liquids used and stored onsite. These documents were previously provided to the Regional Water Board on April 22, 2013 in connection with the Site History submittal required by the 13267 Order.

Lehigh will utilize the most recent plans and update that inventory, as necessary. Lehigh will perform a reconnaissance inspection of the site to a) verify the inventory, b) identify any necessary changes to the inventory, and c) add additional detail required by the 13267 Order, if any. Lehigh will include maps of sufficient detail identifying where these materials are stored and used. In addition, where applicable, Lehigh will reference hazardous material handling practices and the controls in place to prevent or respond to releases.

Inventory Contents

- Tabular list of chemicals including name, CAS number, volume used annually, volume stored at any given time
- Location of chemical use and storage

- Site maps identifying the above locations utilizing the updated site drainage maps prepared pursuant to Directive 4 of the referenced 13267 Order
- Description of specific potential sources of the chemicals in the inventory, controls in place to prevent potential spills, and response activities that would be undertaken to abate any such spills should they occur

Identification of Potential Sources

In addition to the aforementioned inventory, Lehigh will provide a description of potential sources, such as sumps, underground tanks, utility lines, and related facilities.

Schedule of Workplan and Report Activity

Lehigh will implement the WP and subsequent Report according to the following schedule:

2013

May 22, 2013 – Submit Source Identification Work Plan

May 2013 – September 2013 – Implement action under Work Plan

October 22, 2013 – Submit Source Identification Report*

* Given the compressed timeframe to implement the WP, if Lehigh receives RWQCB comment on this WP that requires additional investigation and summary, the Source Identification Report may be submitted after October 22, 2013, up to 120 days after receipt of RWQCB comments.