

# County of Santa Clara

Department of Planning and Development  
Planning Office

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## MEMORANDUM

Date: September 16, 2010

To: **President Ken Yeager and Members of the Board of Supervisors**

**Jeffrey V. Smith, County Executive**  
**Gary Graves, Deputy County Executive**  
**Sylvia Gallegos, Deputy County Executive**

From: Gary Rudholm, Senior Planner, Planning Office *GR*  
Michael M. Lopez, Planning Manager, Planning Office *ML*

Re: **Responses to comments made during the Public Comment portion of the Board of Supervisors Meeting on September 14, 2010, related to Lehigh Southwest Cement Plant and the Permanente Quarry**

During the Public Comment portion of the September 14, 2010, meeting of the Board of Supervisors three speakers made statements to the Board regarding the Lehigh Southwest Cement Plant and the reclamation plan amendments currently under review by the Planning Office for the adjacent Permanente Quarry. The three speakers included Barry Chang, Joyce Eden, and Derek Wong. In order to provide the Board and the County Executive with clear and accurate information related to the issues raised by these speakers staff has prepared the following responses, and obtained the attached documents, for your information.

### **SPEAKER ONE: Barry Chang :**

*"Good morning President Yeager and Board of Supervisors. My name is Barry Chang. I'm Cupertino City Council. I've been here a couple times already. I'm here to talk about the same issue: The Lehigh Cement Plant. Last two times I give you the different Notice of Violation. Today, I'll give you the one from California Regional Water Board. There is a total 11 violations in this and then in the total-- according to the report here, the fine --the penalty could be \$10,000 for each violation, and as I say, total 11 violations. So, if you add it up, it's about \$16.5 million dollars in violations as of yesterday. So, this is serious violations on the water quality in the Bay area. And, last time when I came over, I give you the Notice of Violation from EPA, and, then, if you calculate the enforcement on that violation, its about \$149 million dollars to date for each violation. And, then, for our County-- the Notice of Violation issue from our County, there is at least two Notice of Violation, and there is no fine, no penalty. How come we are so lenient again the polluter? This is the largest single-source of the pollution here . . . ."*

**Response:**

**Regional Water Quality Control Board:**

The Regional Water Quality Control Board (RWQCB) conducted a storm water inspection of the Lehigh Southwest Cement Plant on February 10, 2010, and issued an inspection report. The RWQCB issued a Notice of Violation based on this report on March 26, 2010. A copy of the report and the NOV are attached for reference. The inspection report lists 11 violations that require abatement. Ten of these violations were to have corrective actions completed by April 15, 2010; one violation was to have corrective action completed by May 15, 2010. The Notice of Violation warns Lehigh of consequences for not coming into compliance with its storm water protection requirements, which may include fines. The amount of fines that could be imposed is not stated; instead, the rate by which the fines could be assessed is given.

According to staff of the RWQCB a follow up inspection was made in May 2010. Based on the inspections, the RWQCB believes the Lehigh Southwest Cement Company remains in violation of its industrial storm water permit. Moreover, based on the May inspection the RWQCB is considering whether the existing Water Board regulatory measures applicable to the site are appropriate to address the nature of the ongoing storm water discharges from the site. For this reason the RWQCB advised staff that this case is ongoing. Planning Office staff requested written communication whether fines have been levied or are being considered. As of today the RWQCB has not provided this communication. Consequently, staff will update the Board of Supervisors and County Executive in a follow up memorandum.

The speaker notes the RWQCB could assess fines of as much as \$16.5 million. We have no knowledge of how this calculation was made. Staff will provide follow up information on this detail when the RWQCB provides more information as noted above.

**EPA Notice of Violation:**

The comment regarding the EPA Notice of Violation is a reiteration of a comment made before the Board of Supervisors on August 24, 2010. The response as provided in the previous memo follows:

The U.S. EPA issued a Notice of Violation and Finding of Violation (NOV/FOV) to Lehigh on March 10, 2010. The NOV/FOV concerns a series of physical modifications made to the Facility from 1996 through 1999, that caused an increase in production of cement and an increase in emissions of air pollutants (refer to pages 2-3 of the NOV/FOV attached). As a result, the NOV/FOV also states that Lehigh violated the Title V Operating Permit program, because it failed to identify Prevention of Significant Deterioration requirements in its application submitted to the BAAQMD after installing the modifications. The NOV/FOV states that Lehigh violated Title V requirements. It describes enforcement that may be taken by the EPA, including the assessment of penalties.

The speaker notes that the EPA could assess fines of a much as \$149 million. We have no knowledge of how this calculation was made. Staff will provide follow up information on this detail after obtaining more information from the EPA.

### **Fines by the County of Santa Clara:**

The County is the lead agency in implementing the state Surface Mine and Reclamation Act (SMARA), which requires a mine operator to have a reclamation plan in place approved by the lead agency. The Permanente Quarry, adjacent to the cement plant has a reclamation plan that was approved in 1985. As previously advised, the County issued two Notices of Violation to Lehigh for violations of SMARA. Should the mine operator fail to take action towards abatement of the violations, the County can impose fines for non-compliance. The state statute authorizes the County to fine a mine operator up to \$5,000.00 per day. In determining the amount the lead agency must consider several criteria, including the nature, circumstances, extent, and gravity of the violation or violations. A penalty may only be issued where a mine operator fails to comply with an order to comply, and the statute allows a mine operator to petition for reconsideration of a penalty, first to the legislative body (the County) or to the Superior Court. Lehigh has been working in good faith to date, to abate the violations. As a result, the County has not levied fines against Lehigh.

### **SPEAKER TWO: Joyce Eden**

*"Hi. My name is Joyce Eden. I'm with West Valley Citizens Air Watch. It's a group that's been around since 1996 monitoring the air and other pollutants in the West Valley. And, I just want to be sure that you realize the huge amounts of fines that Barry was speaking to from the Water Board have not been levied. They just represent the seriousness of the fine, and, of course, we think should be levied if these rules and regulations mean anything. We have this beautiful presentation which made me want to speak a little bit to the beauty of our hills, and the threat to them by this new proposed two-hundred acre open pit mine at the Lehigh Cement Plant operation. This would make a huge, new giant scar in our beautiful hills. So, please, you need to consider this. This is a whole entire new operation that's being proposed. This is not just a continuation of what was going on before . . . I just want you to consider that this is a new operation, and not think of it as continuing because we need this to stop. Thank you."*

### **Response:**

Lehigh Hanson submitted an application for a reclamation plan amendment and a use permit on May 28, 2010. Staff refers to this proposal as the "Comprehensive Reclamation Plan Amendment." It would provide for reclamation of all the areas of disturbance at the existing Permanente Quarry. It also proposes an expansion with a second mine-pit in an area where no mining or ground disturbances have taken place. This application is under review. When staff has deemed the application complete the review of the project under the California Environmental Quality Act (CEQA) will commence. The issues identified by the speaker will be among the numerous potential impacts that will be evaluated through the CEQA process and reported in the subsequent environmental impact report. The plan will be subject to public hearings before the Planning Commission, which are anticipated to take place in the spring of 2012. Actions of the Planning Commission may be appealed to the Board of Supervisors.

### **SPEAKER THREE: Derek Wong**

*"Hello. I'm Derek Wong, and I'm a resident of Sunnyvale and a recent college graduate from Santa Barbara. And, I just want to draw attention to the fact that Lehigh Cement Plant is the largest*

*stationary emitter of green house gases in the South Bay area, and it emits about one to one-and-a-half-million metric tons of CO<sub>2</sub> and other harmful gases per year. Thank you."*

**Response:**

The Bay Area Air Quality Management District issued a report titled "Source Inventory of Bay Area Green House Gas Emissions." This inventory includes the Lehigh Southwest cement plant. According to this report, the annual CO<sub>2</sub> emissions from the Lehigh cement plant were 842,475 metric tons in 2007. (Table V from this report, titled "2007 Bay Area Major (Top 200) GHG Emitting Facilities," is attached for reference.) The BAAQMD report identifies the Metcalf Energy Center, which is located west of Highway 101 in the Coyote Valley area, as the stationary source with the highest level of CO<sub>2</sub> gas emissions for Santa Clara County; the Lehigh cement plant was the second highest emitter.

Cement plants are required to report their emissions of green house gases to the California Air Resources Board (CARB). This requirement took effect January 2009, and CARB periodically posts the data from these reports. The CARB posted a report on its web page titled "Greenhouse Gas Emissions Reported to the California Air Resources Board for 2008." According to this report the Lehigh cement plant emitted 709,347 metric tons of CO<sub>2</sub> gases in 2008—which again is less than the amount of CO<sub>2</sub> emitted by the Metcalf Energy Center of 1,278,987 metric tons. A copy of the spreadsheet published by CARB with this information is attached for reference.

**ATTACHMENTS:**

- RWQCB Notice of Violation, March 26, 2010
- RWQCB, Industrial Storm Water Inspection Report, February 10, 2010
- BAAQMD, Table V, "2007 Bay Area Major (Top 200) GHG Emitting Facilities," from "Source Inventory of Bay Area Greenhouse Gas Emissions, Updated February 2010."
- CARB, page 3, "Greenhouse Gas Emissions Reported to the California Air Resources Board for 2008"

cc:

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Gustavo Caraveo, District Two  
Mike Donohoe, District Three  
Tony Filice, District Four  
Scott Strickland, District Five

Miguel Márquez, County Counsel  
Lizanne Reynolds, Deputy County Counsel

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Rob Eastwood, Senior Planner



Linda S. Adams  
Agency Secretary

# California Regional Water Quality Control Board

## San Francisco Bay Region

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<http://www.waterboards.ca.gov/sanfranciscobay>



Arnold Schwarzenegger  
Governor

*Sent via certified Mail - Return Receipt Requested*

March 26, 2010

Lehigh Southwest Cement Co.  
c/o Scott Renfrew, Environmental Manager  
24001 Stevens Creek Boulevard  
Cupertino, CA 95014

**Subject: NOTICE OF VIOLATION and required corrective actions for failure to protect stormwater at industrial facility**

**Facility: Lehigh Southwest Cement Co. (formally Hanson Permanente Cement) Industrial facility, located at 24001 Stevens Creek Boulevard, Cupertino, Santa Clara County  
WDID No. 2 43I006267**

Dear Mr. Renfrew:

You are hereby given notice that the industrial facility indicated above (Facility) is in violation of stormwater protection requirements. On behalf of Water Board staff, a PG Environmental, LLC, inspector recently inspected the Facility, and noted numerous water quality violations. **You are required to correct the problems noted in the attached Inspection Findings, Violations, and Corrective Actions Report and send us documentation of your corrective actions by the dates indicated in this Report.**

The Facility is in violation of the NPDES General Permit for Discharges of Storm Water associated with Industrial Activities Excluding Construction Activities, Order No. 97-03-DWQ (Permit<sup>1</sup>) and the San Francisco Bay Water Quality Control Plan (Basin Plan<sup>2</sup>).

### Permit violations

The Permit requires industrial facility owners to implement controls that reduce pollutants in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology (BAT/BCT) performance standard. Development and implementation of a Storm Water Pollution Prevention Plan that complies with the requirements in Section A of the Permit and that includes Best Management Practices (BMPs)

<sup>1</sup> Permit: [http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/industrial.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.shtml)

<sup>2</sup> Basin Plan Table 4.1, Prohibitions:

[http://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/planningtmdls/basinplan/web/tab/tab\\_4-01.pdf](http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/tab/tab_4-01.pdf)

that achieve BAT/BCT constitutes compliance with this requirement. Our inspector observed that the Facility does not meet this standard, and therefore, the Facility is in violation of the Permit.

**Basin Plan Prohibition violations**

Additionally, the Facility is in violation of the Basin Plan, which is the Regional Water Board's master water quality control document. The Basin Plan applies to all discharges within the Regional Water Board's jurisdiction, including discharges from this Facility. We observed during the February 10, 2010, inspection evidence of discharges that are in violation of, at a minimum, Basin Plan Prohibition 7:

- o **Prohibition 7** prohibits rubbish, refuse, bark, sawdust, or other solid wastes into surface waters or at any place where they would contact or where they would be eventually transported to surface waters, including flood plain areas.

Please refer to the attached inspection report for the details of the violations and required corrective actions.

**Consequences for not coming into compliance**

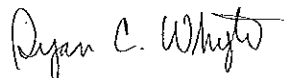
Failure to return to compliance with the Permit and failure to comply with the Basin Plan prohibitions are violations of CWC Section 13385(a)(2) and (a)(4), respectively, for which the Water Board may impose civil liability in the amount not to exceed \$10,000 per day of each violation, plus \$10 per gallon in excess of 1,000 gallons per discharge.

**Additional notes**

If you need guidance, the California Stormwater Quality Association (CASQA) publishes a handbook for Industrial Stormwater Best Management Practices<sup>3</sup>. The CASQA handbook is one of many online resources that describe industry standard BMPs. Please note that Water Board can not specify means of compliance. It is your responsibility to select and correctly implement an appropriate suite of BMPs. Use of the CASQA handbook or other similar guidance documents may help you achieve compliance, but it does not guarantee compliance.

If you have any questions regarding this letter, please contact Christine Boschen at (510) 622-2346 or by email at [cboschen@waterboards.ca.gov](mailto:cboschen@waterboards.ca.gov).

Sincerely,



Dyan C. Whyte  
Assistant Executive Officer

Encl.: February 10, 2010, Inspection Findings, Violations, and Corrective Actions

<sup>3</sup> CASQA BMP Handbook: <http://www.cabmphandbooks.com/Industrial.asp>

February 10, 2010, Inspection Photo Log  
February 10, 2010, Inspection Exhibit Log

cc:

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## Industrial Storm Water Inspection Report

Permittee: Lehigh Southwest Cement, Co. (formerly Hanson Permanente Cement)	WDID No. 2 431006267	Date: 2/10/2010
Facility: Lehigh Southwest Cement, Co.	SIC Code: 3241 – Cement, Hydraulic	Receiving Water: Permanente Creek
Facility Address: 24001 Stevens Creek Boulevard; Cupertino (Santa Clara County), California		
Facility Representative(s)/Title(s): Scott Renfrew (Environmental Manager, Lehigh Southwest Cement, Co.), Wilbur Green (Environmental Engineer, Lehigh Southwest Cement, Co.), Henrik Wesseling (Plant Manager, Lehigh Southwest Cement, Co.)		
Additional persons present: None		Inspector(s): Scott Coulson (PG Environmental, LLC)

### Inspection Findings, Violations, and Corrective Actions

On February 10, 2010, a U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, LLC (hereafter, EPA Contract Inspector) conducted an industrial storm water inspection of the above-referenced facility (hereafter, the Facility). The EPA Contract Inspector held a closing conference at the conclusion of the inspection. During the closing conference, the EPA Contract Inspector reviewed the preliminary inspection findings with the Facility Representatives. Pursuant to all provisions of the California State Water Resources Control Board (SWRCB) Order No. 97-03-DWQ, National Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001 for Discharges of Storm Water Associated with Industrial Activities (the Permit), the findings listed below must be corrected.

The inspection results were forwarded to the San Francisco Bay Regional Water Quality Control Board for its staff to consider and act upon; Water Board staff has edited this inspection report to specifically call out violations, corrective actions, and due dates. Please note that Water Board staff has left the findings of the Contract Inspector, described below, intact.

#### Records Review

Section A.1 of the Permit requires all dischargers to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). Per Section A.10.c of the Permit, the SWPPP must be revised and implemented prior to changes in industrial activities that

- May significantly increase the quantities of pollutants in storm water discharge,
- Cause a new area of industrial activity at the facility to be exposed to storm water, or
- Begin an industrial activity which would introduce a new pollutant source at the facility.

#### **VIOLATION**

Inadequate site map

#### **REQUIRED CORRECTIVE ACTION**

By April 15, 2010, update site maps to clearly identify all structural control measures, authorized non-storm water discharges, and run-on.

Provide a paper and electronic copy to the Regional Water Board.

1. A copy of the SWPPP, last revised in June 2009 and denoted SWPPP 14, was retained onsite as required by Section A.10.a of the Permit. The SWPPP was reviewed during the inspection and found to be inadequate for the following reason:

The Site Map did not clearly identify all structural control measures that affect storm water discharges, authorized non-storm water discharges, and run-on, as required by Section A.4.b of the Permit. SWPPP 14 states "Figure 3 shows the main drainage areas,



flow patterns within drainage areas, settlement ponds, and discharge locations into the Permanente Creek within the Lehigh Southwest Cement Company property boundary.”

However, none of the SWPPP 14 Site Maps (denoted Figures 1—6 of SWPPP 14) include the structural control measures or drainage collection and conveyance system associated with the reuse of onsite storm water runoff and non-storm water sources in the eastern portion of the site. During the inspection, Mr. Scott Renfrew (hereafter, the Environmental Manager) explained the current conditions of the eastern portion to include the following:

- A closed system of water recycling allows water to be reused in the industrial process (e.g., gas conditioning tower, washing aggregate, dust suppression, etc.).
- Drainage inlets and overland flow in the eastern portion of the site are directed to a lift station referred to as “Pearl Harbor” (see attached Photographs 2 and 3), which pumps the water to a man-made pond referred to as the “Lake” (see attached Photographs 4 and 5), which gravity feeds a de-commissioned thickener unit that is used as a holding tank for recycled water (see attached Photograph 6).
- The recycled water system is operated to use water in the dry season, draw down the level of the “Lake,” and create capacity for winter storms.

Because none of the SWPPP 14 Site Maps (denoted Figures 1—6) include the structural control measures associated with the recycled water system, the Facility is in violation. To come into compliance, the Facility must update the Site Map to clearly identify all structural control measures that affect storm water discharges.

**VIOLATION**

Inadequate and non-representative sampling locations

**REQUIRED CORRECTIVE ACTIONS**

By May 15, 2010, complete a water balance survey of all existing plumbing and drainage flows at the Facility, and update the engineering plans and documents to depict the current plumbing systems and drainage flows on the Facility property. The water balance survey and documentation must address all water onsite, including storm water, process water, and waste water.

Provide a paper and electronic copy of the water balance survey to the Regional Water Board.

Based on the results of the above-described survey, revise storm water sampling locations, and update Facility maps and monitoring plan accordingly. Provide a paper and electronic copy of all related documents to the Regional Water Board.

2. The Permittee’s Monitoring Program was not in accordance with the sampling location requirements specified by Section B.7 of the Permit. Specifically, the sample collection location denoted SL-21-PD at the outlet of Pond 17 was not representative of the quality and quantity of the facility’s storm water discharges from Pond 17.

Rather than collecting the sample at the outfall pipe to Permanente Creek (see attached Photograph 16), Figure 4 of SWPPP 14, Storm water Sampling Locations, indicates that the SL-21-PD sample is collected at the outlet of Pond 17 (see attached Photograph 12). Due to the existence of a complex plumbing configuration down-gradient of the Pond 17 outlet, the SL-21-PD sample collection location was not representative of the

quality and quantity of the discharge from Pond 17.

The plumbing configuration down-gradient of the Pond 17 outlet includes an open vault with a sump pump (see attached Photograph 15), and several pipes (see attached Photographs 14 and 16). The Environmental Manager could not explain what the pipes and sump pump are used for. However, the sump pump had the ability to affect the quantity of the facility’s storm water discharges from Pond 17. As

a result, the SL-21-PD sample collection location did not meet the requirements specified in Section B.7 of the Permit. The Permittee must identify and collect samples from locations that represent all drainage areas, and the quality and quantity of the facility's storm water discharges.

### Facility Inspection

All Best Management Practices (BMPs) mentioned in the following findings must be selected, installed, implemented and maintained according to Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce or prevent pollutants associated with industrial activity in storm water discharges as required by Effluent Limitation B.3 of the Permit.

<p><b>VIOLATION</b> Observed discharge of pollutants to waters of the state</p> <p><b>REQUIRED CORRECTIVE ACTIONS</b> By April 15, 2010, select, install, implement, and maintain BMPs to meet BAT and BCT to eliminate discharge of pollutants from Pond 17 into Permanente Creek.</p> <p>In order to come into compliance, you may need to implement temporary BMPs and later come back in and implement more permanent measures.</p> <p>Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.</p>
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3. A visible discharge of pollutants (i.e., sediment and/or other pollutants) into Permanente Creek was observed during the inspection, as described below. Adequate BMPs were not implemented to prevent the discharge of pollutants from Pond 17 located in the southeast portion of the site, down-gradient of the Rock Plant.

Pollutants were being actively conveyed from the Rock Plant (see attached Photographs 7 and 8) to the Pond 17 inlet. Pollutant accumulation was present along the entire inlet portion of Pond 17, including evidence of a high flow event that had caused the inlet check dams to breach (see attached Photograph 9).

Moreover, pollutant-laden flow was observed passing over the outlet weir section (see attached Photographs 10 and 11) and through

the outlet pipe (see attached Photographs 12 and 13). As specified in Figure 2 of SWPPP 14, the Pond 17 outlet is connected to an outfall to Permanente Creek below Dinky Shed Basin. The Pond 17 outlet flows to a drainage vault (see attached Photographs 14 and 15), which then discharges at the outfall to Permanente Creek. Pollutant-laden flow was observed at the outfall (see attached Photograph 16), and in the Permanente Creek receiving water (see attached Photograph 17 through 19).

As a result, there was an active pollutant-laden discharge during the inspection. Because Pond 17 was not functioning as an adequate BMP for pollutant removal, either the pond must be modified to provide additional filtering and settling of pollutants, or adequate BMPs must be implemented for the pollutant generating sources at the Rock Plant to reduce pollutant conveyance to the pond, and prevent the subsequent discharge of pollutants to Permanente Creek.

**VIOLATION**

Potential discharge of pollutants to waters of the state

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, select, install, implement, and maintain BMPs to meet BAT and BCT to eliminate discharge of pollutants from Drainage Area D and Pond 9 into Permanente Creek.

Please note that restrictions imposed by regulatory agencies for the dredging of these or other ponds does not prevent the facility from selecting, implementing, and maintaining appropriate and effective BMPs. In order to come into compliance, you may need to implement temporary BMPs and later come back in and implement more permanent measures.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

4. The EPA Contract Inspector observed, during the inspection, that the Pond 9 BMP was not adequately inspected and maintained to prevent the discharge of sediment from the up-gradient sediment generating sources in Drainage Area D to Permanente Creek. Table 6-1 of SWPPP 14 shows that the contributing area for Pond 9 is Drainage Area D, which includes the Rock Plant Road.

Sediment accumulation was present at the southwestern inlet to Pond 9, and sediment was being actively conveyed from the Rock Plant Road to the southwestern inlet to Pond 9 (see attached Photographs 20 and 21). Sediment-laden water was present in Pond 9, and erosion was observed at the northeastern inlet which lacked flow dissipation BMPs (see attached Photograph 22). As specified in Figure 2 of SWPPP 14, the Pond 9 outlet is connected to an outfall to Permanente Creek, denoted as the SL-17 PD sample collection location (see attached Photographs 23 and 24).

The Environmental Manager explained that maintenance of Pond 9 had been restricted by regulatory agency actions in the past, but maintenance of Pond 9 was re-instituted in 2007. As a result of the sediment accumulation and sediment-laden water present in Pond 9, there was a potential for the discharge of sediment to Permanente Creek. BMPs must be adequately inspected and maintained to reduce sediment conveyance to the pond from the sediment generating sources in Drainage Area D, and prevent the subsequent discharge of sediment to Permanente Creek.

**VIOLATION**

Inadequate source control BMPs; slope erosion

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, select, install, implement, and maintain BMPs to meet BAT and BCT to provide sufficient source control in Drainage Area D. In order to come into compliance, you may need to implement temporary BMPs and later come back in and implement more permanent measures.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

5. The EPA Contract Inspector observed, during the inspection, that BMPs were not adequately inspected and maintained to prevent the discharge of sediment from a series of sediment traps located along Rock Plant Road. Table 6-1 and Figure 3 of SWPPP 14 shows that this portion of the Rock Plant Road is located in Drainage Area D, which drains to Pond 9.

Evidence of slope erosion was observed at an area known as the Rock Pile, including gully formation on the Rock Pile slope (see attached Photograph 26). Sediment accumulation in the sediment trap at the

base of the Rock Pile was nearing the capacity of the BMP (see attached Photograph 27). Subsequent down-gradient sediment traps along Rock Plant Road were also nearing capacity due to sediment accumulation (see attached Photographs 28 and 29). Sediment-laden flow was observed bypassing the sediment trap BMPs and flowing down the roadway (see attached Photograph 29), potentially contributing to the sediment loading in Pond 9 (as described in Finding 4, above).

The Environmental Manager indicated that the Permittee does not have a structured schedule for inspection and maintenance of structural BMPs such as Pond 9 and the sediment traps. Because the sediment trap BMPs and Pond 9 had not been adequately inspected and maintained, there was a potential for the discharge of sediment beyond Pond 9 to Permanente Creek. BMPs must be adequately selected, installed, inspected, and maintained to reduce sediment conveyance to the pond from the sediment generating sources in Drainage Area D, and prevent the subsequent discharge of sediment to Permanente Creek.

**VIOLATION**

Inadequate source control BMPs; slope erosion

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, select, install, implement, and maintain BMPs to meet BAT and BCT to provide sufficient source control on slope northwest of Pond 13B.

In order to come into compliance, you may need to implement temporary BMPs and later come back in and implement more permanent measures.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

6. The EPA Contract Inspector observed, during the inspection, that adequate BMPs were not implemented to prevent the discharge of sediment from a disturbed slope located northwest of Pond 13B. Evidence of slope erosion and concentrated flow was observed northwest of Pond 13B, including gully formation (see attached Photographs 30 and 31). A shelf at the toe of the slope would prevent flow from entering Pond 13B; instead directing flow events toward Pond 13, an instream sediment control pond (see attached Photographs 30 through 33).

As specified in Figure 2 of SWPPP 14, a drainage conveyance is installed on this slope with the intent of directing flow from

the Primary Crusher area to Pond 13A, which is located further northeast of the subject ponds. The gully formation on the disturbed slope indicates that flow had bypassed the intended route along the drainage conveyance. The Environmental Manager indicated that this drainage conveyance was in need of repairs.

As a result, there was a potential for concentrated flow from the disturbed slope to be conveyed along the shelf at the toe of the slope, and the subsequent discharge of sediment to Permanente Creek at the instream sediment control pond denoted Pond 13 (see attached Photograph 34). Adequate BMPs must be implemented to prevent the discharge of sediment from the disturbed slope to Permanente Creek at the instream sediment control pond denoted Pond 13.

**VIOLATION**

Inadequate Material Handling and Storage BMPs at vehicle and equipment maintenance shop in northeast corner of Rock Plant

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, select, implement, and maintain adequate material handling and storage BMPs. Identify all non-storm water discharges. Eliminate prohibited non-storm water discharges.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

Implement BMPs as described in revised SWPPP.

7. The EPA Contract Inspector observed, during the inspection, that adequate Material Handling and Storage BMPs were not implemented to minimize exposure of significant materials to storm water at the vehicle and equipment maintenance shop located in the northeast corner of the Rock Plant (see attached Photograph 35). Automotive lubricants and other chemicals were stored in standing water at the chemical storage area (see attached Photographs 36 through 39).

Standing water has the potential to increase storm water contact with pollutants, particularly during loading and unloading operations. As a result, there was a potential for the contribution of pollutants

to storm water. Section A.8.a.iv of the Permit requires Facility operators to consider implementation of material handling and storage BMPs to minimize exposure of significant materials to storm water. Adequate BMPs must be implemented to minimize exposure of pollutants to storm water at the vehicle and equipment maintenance shop located at the Rock Plant.

**VIOLATIONS**

Inadequate Material Handling and Storage BMPs at vehicle and equipment wash bay;  
Discharge of prohibited non-storm water discharges;  
Failure to identify non-storm water discharges;  
Failure to implement SWPPP

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, select, implement, and maintain adequate material handling and storage BMPs. Identify all non-storm water discharges. Eliminate prohibited non-storm water discharges.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

Implement SWPPP as updated per above-stated corrective actions.

8. The EPA Contract Inspector observed, during the inspection, that adequate Material Handling and Storage BMPs were not implemented to minimize exposure of significant materials to storm water and non-storm water sources at the vehicle and equipment wash bay located in the northeast corner of the Rock Plant. Vehicle and equipment wash water and associated pollutants were actively flowing into an oil skimmer unit located outside the wash bay (see attached Photographs 35 and 41).

In an e-mail dated February 24, 2010, The Environmental Manager stated that "the SOP to keep the area free of oily residue will allow for water to be discharged after inspection for oil sheen or other contaminants...water will be filtered prior to discharge" (see attached Exhibits 1 and

2). However, non-storm water discharges that do not meet the conditions provided in Special Conditions D.1 of the Permit (e.g., vehicle and equipment wash water) are prohibited under Discharge Prohibition A.1 of the Permit. Furthermore, Section A.6.a.v of the Permit requires the investigation and identification of all non-storm water discharges and their sources.

Section 4.4 of SWPPP 14 did not identify the vehicle and equipment wash bay as a potential non-storm water pollutant source. Table 5-2 of SWPPP 14 specifies "do not permit wash water to...runoff onto ground surface...recycle wash water," but this BMP had not been adequately implemented onsite (see attached Photographs 35 and 41). Oily residues were present throughout the area adjacent to the skimmer (see attached Photographs 42 through 44).

As a result of the Permittee's SOP described in an e-mail dated February 24, 2010, there was a potential for wash water and associated pollutants "to be discharged after inspection for oil sheen or other contaminants." The SWPPP must be updated to identify the wash bay as a potential non-storm water pollutant source. Moreover, non-storm water discharges that do not meet the conditions provided in Special Conditions D are prohibited under Section A.6.a.v of the Permit. If the discharge of wash water occurs as indicated in the Permittee's SOP (described in the e-mail dated February 24, 2010), the unauthorized non-storm water discharge must either be eliminated or a separate permit must be obtained.

**VIOLATION**

Inadequate Material Handling and Storage BMPs for containment of cleaning materials at vehicle and equipment washing area near Pearl Harbor Lift Station

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, select, implement, and maintain adequate material handling and storage BMPs.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

9. The EPA Contract Inspector observed, during the inspection, that adequate Material Handling and Storage BMPs were not implemented to minimize exposure of cleaning materials to storm water and non-storm water sources at the vehicle and equipment washing area located near the Pearl Harbor lift station in the eastern portion of the cement plant (see attached Photograph 45).

The Environmental Manager indicated that the area is used for washing equipment such as trucks and street sweepers, and the wash

water drains to the Pearl Harbor lift station. This drainage connection was not confirmed during the inspection. A drum of acidic descaler was stored in standing water at the vehicle and equipment washing area (see attached Photographs 46 and 47). Standing water has the potential to increase storm water contact with pollutants.

Additionally, a second drum containing acidic descaler residues was stored without the drum bung intact (see attached Photographs 46 and 48). As a result, there was a potential for the contribution of pollutants to storm water. Section A.8.a.iv requires Facility operators to consider implementation of material handling and storage BMPs to minimize exposure of materials to storm water. Adequate BMPs must be implemented to minimize exposure of pollutants to storm water at the vehicle and equipment washing area located in the eastern portion of the cement plant.

**VIOLATION**

Inadequate Material Handling and Storage BMPs at heavy equipment maintenance pad east of active quarry pit

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, select, implement, and maintain adequate material handling and storage BMPs.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

10. The EPA Contract Inspector observed, during the inspection, that adequate Material Handling and Storage BMPs were not implemented to minimize exposure of significant materials to storm water at the heavy equipment maintenance pad located east of the active quarry pit near the Quarry Office (see attached Photograph 49).

In an e-mail dated February 24, 2010, The Environmental Manager stated that "the SOP to keep the area free of oily residue will allow for water to be discharged after

inspection for oil sheen or other contaminants...water will be filtered prior to discharge" (see attached Exhibits 1 and 2). However, standing water was present on the concrete maintenance pad and the pad was nearing capacity (see attached Photographs 49 and 55). Standing water has the potential to increase storm water contact with pollutants, particularly after maintenance activities occurring on the concrete pad.

Full drums of petroleum-based automotive lubricants were stored in standing water at the concrete pad (see attached Photographs 50 through 52). In addition, an open waste container used for hazardous wastes (e.g., oil soaked rags, etc.) had accumulated standing water inside (see attached Photographs 53 and 54). As a result of these material storage practices and the standing water near the capacity of the concrete pad (see attached Photographs 49 and 55), there was a potential for the contribution of pollutants to storm water and the subsequent release of pollutants from the concrete pad.

Section A.8.a.ii of the Permit requires Facility operators to consider implementation of preventative maintenance BMPs for regular inspection and maintenance of structural storm water controls (e.g., concrete maintenance pads). Adequate BMPs must be implemented to minimize exposure of pollutants to storm water at the concrete maintenance pad located east of the active quarry pit near the Quarry Office.

**VIOLATION**

Incorrectly installed and maintained dirt road and active erosion located approximately 0.5 miles southeast of West Material Storage Area

**REQUIRED CORRECTIVE ACTIONS**

By April 15, 2010, install erosion control BMPs to protect road and associated cut and fill slopes from erosion. In order to come into compliance, you may need to implement temporary BMPs and later come back in and implement more permanent measures.

Revise the Facility's SWPPP to document updates, and submit a paper and electronic copy to the Regional Water Board.

11. The EPA Contract Inspector observed, during the inspection, that adequate BMPs were not implemented to prevent the discharge of sediment from the unstabilized Upper Quarry Road, roadway shoulder, and associated cut and fill slopes located approximately 0.5 miles southeast of the West Material Storage Area (see attached Photograph 56).

The slope near the intersection of Upper Quarry Road and an access road leading northeast, showed erosion, including gully formation (see attached Photographs 56 and 57), fine sediment accumulation at the toe of the slope (see attached Photograph 58), and slope failure (see attached Photograph 59).

In addition, flow dissipation BMPs had not been implemented in the roadway drainage ditches, and erosive flow was observed running down the surface of Upper Quarry Road without proper grade to direct flows into the drainage ditches (see attached Photographs 60 through 62). As a result, there was a potential for the discharge of sediment to the active Quarry Pit. Furthermore, the unstabilized Upper Quarry Road, roadway shoulder, and associated cut and fill slopes are a potential source of the elevated total suspended solids results (47,200 mg/L) at the SL-6-RD sample location on January 18, 2010. Adequate BMPs must be implemented to prevent the discharge of sediment from the unstabilized Upper Quarry Road, roadway shoulder, and associated cut and fill slopes to the active Quarry Pit.



**Facilities**  
**Greenhouse Gas Emissions Reported to the**  
**California Air Resources Board for 2008**

**Note: The data shown in the included table were submitted to the California Air Resources Board to comply with the requirements of the mandatory reporting regulation for greenhouse gases. This report shows the emissions reported and reporting status as of the date on the table. The status of the data reporting is listed (e.g., Certified accurate and complete by the reporter, In Progress, or Verified by an accredited third party verification body). All data have not been reviewed by ARB staff to evaluate their quality and are subject to change. Subsequent reports may show different emissions or other data than those provided here.**

The data table provided on the Facility Emissions tab of this spreadsheet includes facilities reporting their greenhouse gas (GHG) emissions to the California Air Resources Board and their emissions.

*Emissions from out-of-state power plants are shown where a California retail provider or marketer has operational control over the facility. These emissions may not be associated with power imported to California.*

Descriptions of the provided data are below.

[1] ARB ID	ARB facility identification code
[2] Facility Name	Name of the facility
[3] CO2e Total emissions	Total greenhouse gas emissions (metric tonnes of CO2 equivalent). Includes CH4 and N2O emissions converted to CO2e.
[4] CO2e non-biomass emissions	Total greenhouse gas emissions <i>excluding</i> CO2 emissions from the combustion of biomass derived products (metric tonnes of CO2 equivalent). Includes CH4 and N2O emissions converted to CO2e.
[5] CO2 biomass only	Total CO2 emissions from the combustion of biomass derived products (metric tonnes of CO2 )
[6] City	City of facility contact
[7] State	State of facility contact
[8] Zip Code	Zip code of facility contact
[9] Primary Sector	Economic sector - primary
[10] Secondary Sector	Economic sector - secondary
[11] NAICS code	North American Industry Classification System code
[12] Generating Facility Nameplate Capacity	Full load generating capacity of the facility electrical generators in megawatts (may not apply to all types of facilities)
[13] Report Submission Status	Status of report: "Certified" as accurate and complete by manager, "In Progress," or "Verified" by accredited third party verification body. "In Progress" means that either the original report has not been completed or that a previously submitted and certified report is undergoing revisions.

Facility ID#s	Facility Name	Reported CO2 Equivalent (CO2e) Emissions		Mailing Address		Reporting Sector and North American Industry Classification System (NAICS) Code		Other Information		
		CO2e Total (non-biomass + biomass)	CO2e Non-Biomass (metric tons)	City	State	Primary Reporting Sector	Secondary Reporting Sector	NAICS Code	Generating Facility Nameplate Capacity (MW)	Report Status
101461	Gannett, Inc. South San Francisco	41,434	41,434	South San Francisco	California	94300	Other	221310 - Newspaper, Book, and Mail Printing, Publishing, and Reproduction	3	Certified
101690	General Chemical Corporation	3,030	3,030	Richmond	California	94801	Other	282999 - All Other Basic Inorganic Chemical Manufacturing	1	Certified
101700	General Mills Cereal	20,485	20,485	Loos	California	95241-1900	General Stationary Combustion	311200 - Breadstuf and Pastry Manufacturing	3	Certified
101700	General Mills Cereal	30,342	30,342	Antioch	California	94500	General Stationary Combustion	312420 - Oxygen Product Manufacturing	725	Certified
101720	Georgia-Pacific Gypsum	194,989	194,989	Midtown	California	95030	Electricity Generation	221119 - Other Electric Power Generation	48	Certified
101730	Georgia-Pacific Gypsum	10,000	10,000	Yuba City	California	95600	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	47	Certified
101740	Georgia-Pacific Gypsum	10,000	10,000	Yuba City	California	95600	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	47	Certified
101750	Georgia-Pacific Gypsum	50,567	50,567	Yuba City	California	95600	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	44	Certified
101760	Georgia-Pacific Gypsum	13,377	13,377	King City	California	95030	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	47	Certified
101770	Georgia-Pacific Gypsum	13,480	13,480	King City	California	95030	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	47	Certified
101780	Georgia-Pacific Gypsum	18,485	18,485	Antioch	California	95030	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	47	Certified
101790	Georgia-Pacific Gypsum	14,917	14,917	Fairfield	California	95030	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	50	Certified
101800	Georgia-Pacific Gypsum	16,967	16,967	Chico	California	91310	Coproduction Facility	221119 - Other Electric Power Generation	10	Certified
101810	Goodman Chula Vista Plant	8,003	8,003	Chula Vista	California	95030	Electricity Generation	221315 - Fossil Fuel Electric Power Generation	35	Certified
101820	Goodman Chula Vista Plant	130,370	130,370	Santa Clara	California	95030	General Stationary Combustion	221315 - Fossil Fuel Electric Power Generation	238	Certified
101830	Graphic Packaging International, Inc	202,586	125,851	Oroville	California	91200	Electricity Generation	222111 - Paper (except Newsprint) Mills	65	Certified
101840	Graphic Packaging International, Inc	76,705	76,705	Oroville	California	91200	Electricity Generation	222111 - Paper (except Newsprint) Mills	65	Certified
101850	Graphic Packaging International, Inc	85,027	85,027	Kingstree	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	102	Certified
101860	Graphic Packaging International, Inc	27,837	27,837	Kingstree	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	102	Certified
101870	Graphic Packaging International, Inc	7,450	7,450	Troy	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	22	Certified
101880	Graphic Packaging International, Inc	185,764	185,764	Plating	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	22	Certified
101890	Graphic Packaging International, Inc	189,982	189,982	Plating	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	22	Certified
101900	Graphic Packaging International, Inc	185,221	185,221	Bay Point	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	22	Certified
101910	Graphic Packaging International, Inc	184,466	184,466	Ketchikan	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	22	Certified
101920	Graphic Packaging International, Inc	219,485	219,485	Hanford	California	94801	Other	221112 - Fossil Fuel Electric Power Generation	109	Certified
101930	Graphic Packaging International, Inc	25,205	25,205	Wilmington	California	92240	Electricity Generation	221119 - Other Electric Power Generation	58	Certified
101940	Graphic Packaging International, Inc	4,687	4,687	Heber	California	92384	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	830	Certified
101950	Graphic Packaging International, Inc	1,709,146	1,709,146	Vallejo	California	93398	Coproduction Facility	221112 - Fossil Fuel Electric Power Generation	48	Certified
101960	Graphic Packaging International, Inc	200,597	200,597	Sacramento	California	93398	Coproduction Facility	221112 - Fossil Fuel Electric Power Generation	830	Certified
101970	Graphic Packaging International, Inc	71,803	71,803	Vallejo	California	93398	Coproduction Facility	221112 - Fossil Fuel Electric Power Generation	48	Certified
101980	Graphic Packaging International, Inc	264,891	264,891	Vallejo	California	93398	Coproduction Facility	221112 - Fossil Fuel Electric Power Generation	30	Certified
101990	Graphic Packaging International, Inc	30,059	30,059	Wendell	California	95321	General Stationary Combustion	221210 - Biochemical and Allied Product Manufacturing	30	Certified
102000	Graphic Packaging International, Inc	1,541	1,541	Acacia	California	95321	General Stationary Combustion	221112 - Fossil Fuel Electric Power Generation	63	Certified
102010	Graphic Packaging International, Inc	293,131	293,131	Contra Costa	California	92251	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	238	Verified
102020	Graphic Packaging International, Inc	2,586	2,586	Brandywine	California	92251	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	50	Verified
102030	Graphic Packaging International, Inc	70,775	70,775	Woodville	California	92305	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	1	Certified
102040	Graphic Packaging International, Inc	1,011	1,011	Woodville	California	92305	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	1	Certified
102050	Graphic Packaging International, Inc	116,865	116,865	Oxnard	California	91700	Other	221200 - Chemical and Allied Product Manufacturing	3	In Progress
102060	Graphic Packaging International, Inc	39,341	39,341	Oxnard	California	91700	Other	221200 - Chemical and Allied Product Manufacturing	29	Certified
102070	Graphic Packaging International, Inc	28,740	28,740	Bucklinville	California	9320015	General Stationary Combustion	331421 - Fruit and Vegetable Canning	2	Certified
102080	Graphic Packaging International, Inc	6,348	6,348	Concord	California	92121	Other	311421 - Fruit and Vegetable Canning	46	Certified
102090	Graphic Packaging International, Inc	6,348	6,348	San Diego	California	92121	Other	311421 - Fruit and Vegetable Canning	46	Certified
102100	Graphic Packaging International, Inc	189,991	189,991	Bakersfield	California	93307	Petroleum Refinery	324110 - Petroleum Refineries	300	Certified
102110	Graphic Packaging International, Inc	171,140	171,140	Bakersfield	California	93307	Petroleum Refinery	324110 - Petroleum Refineries	300	Certified
102120	Graphic Packaging International, Inc	35,941	35,941	Bakersfield	California	93301	Coproduction Facility	221119 - Other Electric Power Generation	35	Certified
102130	Graphic Packaging International, Inc	64,424	64,424	Shinghauser	California	93601	Electricity Generation	992212 - Spelt Waste Landfill	8	Certified
102140	Graphic Packaging International, Inc	20,742	20,742	Shinghauser	California	93601	Electricity Generation	992212 - Spelt Waste Landfill	13	Certified
102150	Graphic Packaging International, Inc	18,055	18,055	Shinghauser	California	93601	Electricity Generation	992212 - Spelt Waste Landfill	13	Certified
102160	Graphic Packaging International, Inc	12,045	12,045	Shinghauser	California	93601	Electricity Generation	992212 - Spelt Waste Landfill	11	Certified
102170	Graphic Packaging International, Inc	2,543,388	2,543,388	Shinghauser	California	93601	Electricity Generation	992212 - Spelt Waste Landfill	1,048	Certified
102180	Graphic Packaging International, Inc	102,456	102,456	Agoura	California	93001	General Stationary Combustion	5022 - Waste Treatment and Disposal	12	Certified
102190	Graphic Packaging International, Inc	30,198	30,198	Agoura	California	93001	General Stationary Combustion	5022 - Waste Treatment and Disposal	15	Certified
102200	Graphic Packaging International, Inc	25,754	25,754	Agoura	California	93001	General Stationary Combustion	5022 - Waste Treatment and Disposal	13	Certified
102210	Graphic Packaging International, Inc	48,542	48,542	Agoura	California	93001	General Stationary Combustion	5022 - Waste Treatment and Disposal	13	Certified
102220	Graphic Packaging International, Inc	865,600	865,600	City of Industry	California	93007	Electricity Generation	992212 - Solid Waste Landfill	6	Certified
102230	Graphic Packaging International, Inc	76,314	76,314	Walnut	California	93274	General Stationary Combustion	3115 - Dairy Product Manufacturing	6	Certified
102240	Graphic Packaging International, Inc	71,767	71,767	Walnut	California	93274	General Stationary Combustion	3115 - Dairy Product Manufacturing	6	Certified
102250	Graphic Packaging International, Inc	24,942	24,942	Lemoore	California	94361	General Stationary Combustion	5417 - Scientific Research and Development Services	1	Certified
102260	Graphic Packaging International, Inc	709,347	709,347	Redding	California	93003	General Stationary Combustion	327310 - Cement Manufacturing	1	Certified
102270	Graphic Packaging International, Inc	503,260	503,260	Redding	California	93003	General Stationary Combustion	327310 - Cement Manufacturing	1	Certified
102280	Graphic Packaging International, Inc	709,347	709,347	Cupertino	California	95044	General Stationary Combustion	327310 - Cement Manufacturing	1	Certified
102290	Graphic Packaging International, Inc	30,576	30,576	Lemoore	California	93245	General Stationary Combustion	311 - Food Manufacturing	8	Certified
102300	Graphic Packaging International, Inc	67,378	67,378	Los Banos	California	93245	General Stationary Combustion	311 - Food Manufacturing	8	Certified
102310	Graphic Packaging International, Inc	43,300	43,300	Brea	California	93300	Coproduction Facility	221111 - Crude Petroleum and Natural Gas Extraction	4	Certified
102320	Graphic Packaging International, Inc	160,038	160,038	Bakersfield	California	94801	Other	339411 - Aircraft Manufacturing	48	Certified
102330	Graphic Packaging International, Inc	202,745	202,745	San Jose	California	94801	Other	339411 - Aircraft Manufacturing	186	Certified
102340	Graphic Packaging International, Inc	61,462	61,462	Loma Linda	California	91342	General Stationary Combustion	81130 - Chemical, Metallurgical and Professional Services	11	Certified
102350	Graphic Packaging International, Inc	15,070	15,070	Lake View Terrace	California	91342	General Stationary Combustion	81130 - Chemical, Metallurgical and Professional Services	11	Certified
102360	Graphic Packaging International, Inc	154,881	154,881	Wilmington	California	91342	General Stationary Combustion	81130 - Chemical, Metallurgical and Professional Services	11	Certified
102370	Graphic Packaging International, Inc	2,214,909	2,214,909	Long Beach	California	900515700	Electricity Generation	56 - Administrative and Support and Waste Management and Remediation Services	482	Certified
102380	Graphic Packaging International, Inc	1,023,847	1,023,847	Long Beach	California	900515700	Electricity Generation	56 - Administrative and Support and Waste Management and Remediation Services	1,684	Certified
102390	Graphic Packaging International, Inc	45,091	45,091	Long Beach	California	900515700	Electricity Generation	56 - Administrative and Support and Waste Management and Remediation Services	823	Certified
102400	Graphic Packaging International, Inc	53,494	53,494	Long Beach	California	900515700	Electricity Generation	56 - Administrative and Support and Waste Management and Remediation Services	573	Certified
102410	Graphic Packaging International, Inc	1,205,183	1,205,183	San Jose	California	95030	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	186	Certified
102420	Graphic Packaging International, Inc	37,394	37,394	Huron	California	93254	General Stationary Combustion	311 - Food Manufacturing	308	Certified
102430	Graphic Packaging International, Inc	1,205,183	1,205,183	Pittsburg	California	95030	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	308	Certified
102440	Graphic Packaging International, Inc	37,394	37,394	Pittsburg	California	95030	Electricity Generation	221112 - Fossil Fuel Electric Power Generation	170	Certified
102450	Graphic Packaging International, Inc	25,145	25,145	Soron	California	93316	Electricity Generation	221119 - Other Electric Power Generation	194	Certified
102460	Graphic Packaging International, Inc	171,350	171,350	Bakersfield	California	93308	General Stationary Combustion	221119 - Other Electric Power Generation	25	Certified
102470	Graphic Packaging International, Inc	33,597	33,597	Bakersfield	California	93308	General Stationary Combustion	221119 - Other Electric Power Generation	25	Certified
102480	Graphic Packaging International, Inc	614,801	614,801	Barstow	California	91903	Electricity Generation	22111 - Electric Power Generation	240	Certified
102490	Graphic Packaging International, Inc	34,685	34,685	Barstow	California	91903	Electricity Generation	22111 - Electric Power Generation	97	Certified
102500	Graphic Packaging International, Inc	30,009	30,009	Pleasanton	California	80725	Electricity Generation	22112 - Fossil Fuel Electric Power Generation	134	Certified
102510	Graphic Packaging International, Inc	387,537	387,537	Marinez	California	94553	Coproduction Facility	22111 - Electric Power Generation	140	Certified
102520	Graphic Packaging International, Inc	182,553	182,553	McClatchey	California	93308	Coproduction Facility	22112 - Fossil Fuel Electric Power Generation	48	Certified