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July 1, 2011

Via Email

Ms. Dyan C. Whyte
Assistant Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
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Christian Carrigan, Esq.
Senior Staff Counsel, Office of Enforcement
State Water Resources Control Board
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Sacramento, CA 95812-0100

Re: Lehigh Southwest Cement – Permanente Facility – Additional
Information to Support Lehigh’s Request for Revised Submission
Schedule for June 14, 2011 Section 13267 Order

Dear Dyan and Cris:

This is in response to your request for some additional information to support Lehigh’s proposed schedule submitted earlier this week. Specifically, you asked for additional explanation of Lehigh’s proposal schedule for the later submittals.

As reflected in the proposed schedule below, we have requested a submittal date of September 30 for Items B, C and K.

Based on our review of all the items to be submitted, we believe that the later submittals will necessarily build on the earlier submittals. Further, we believe that it will be critical to the success of our joint efforts to have interaction with the Regional Board staff between the July and September submittals. As explained in my letter

Ms. Dyan Whyte
Christian Carrigan, Esq.
July 1, 2011
Page 2

earlier this week, our efforts to schedule meetings with your staff have proven challenging so far. In any case, we would like to schedule a meeting with the Regional Board staff after the July 15 submittals to review them, as well as Lehigh's progress in preparing the September submittals. We would like to allow sufficient time between the meeting and the September submittal date to take Regional Board feedback into account in preparing our September submittals.

As to the proposed September submittals themselves, the detailed description of water conveyance and storage systems at the Permanente Plant will require an engineering analysis which includes: review of existing drawings and documents; discussions with plant employees; onsite reconnaissance of sub-grade pipelines, ditches, and vaults; possible remote tracing techniques, and other investigative measures. Further quantitative analyses will entail surface hydrologic flow modeling and capacity determinations of conveyance structures. The hydrologic modeling will require a detailed survey of the drainage areas to determine flow paths, routing, and runoff characteristics. Capacity determinations will require the sizing of pipeline, pumps, and storage structures as well as slope and construction material determinations. These analyses will lead to detailed descriptions of the outfalls to Permanente Creek.

During the time these tasks are underway, the delineation of waters referenced in item K will require estimates of subsurface groundwater flow and additional technical and potential regulatory review.

Finally, this information, combined with the Monitoring Program data, will be used to prepare the Report of Waste Discharge. Accordingly, because the Report of Waste Discharge will build on all the information gathered to date, we have made one change to our proposal from earlier this week. Lehigh proposes that the comprehensive Report of Waste Discharge submittal date be November 30. In addition to the fact that this report will build on the prior submittals, we again need to allow sufficient time for interaction between Regional Board staff and Lehigh representatives following the September submittals, and to take that feedback into account in developing this comprehensive document.

The proposed schedule with the November submittal date for the Report of Waste Discharge, is included herein for your convenience:

Ms. Dyan Whyte
Christian Carrigan, Esq.
July 1, 2011
Page 3

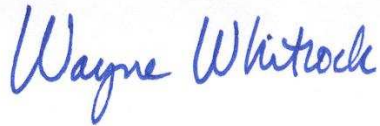
| Submittal | Proposed Due Date |
|--|--------------------------|
| A. Sand & Gravel Permit Notice of Intent | July 15, 2011 |
| B. Water Process Flow Diagram | September 30, 2011 |
| C. Drainage and Operation Maps | September 30, 2011 |
| D. Outfalls to Permanente Creek | September 30, 2011 |
| E. Facility Operation / Maintenance Schedule | July 15, 2011 |
| F. Final Monitoring Plan | July 15, 2011 |
| G. Dry Weather Monitoring Data | October 30, 2011 |
| H. Wet Weather Monitoring Data | June 30, 2012 |
| I. Process Input Output | July 15, 2011 |
| J. Report of Waste Discharge | November 30, 2011 |
| K. Delineation of Waters | September 30, 2011 |

I trust that this letter provides sufficient explanation, but we would be happy to discuss this or provide any additional documentation that you would like.

Again, thank you for your consideration.

Ms. Dyan Whyte
Christian Carrigan, Esq.
July 1, 2011
Page 4

Sincerely,



Wayne M. Whitlock

cc: Ms. Shin Roei Lee
Mr. Brian Thompson
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Mr. Henrik Wesseling
Mr. Axel Conrads
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