

**Hand Delivery to:**  
Redding Office- RWQCB

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September 27, 2007

Dan Warner  
California Regional Water Quality Control Board  
Central Valley Region  
415 Knollcrest Drive, ste. 100  
Redding, CA 96002

**Subject: Lehigh Southwest Cement Comments on JF Shea Construction Company Inc's, Fawndale Rock and Asphalt Facility draft NPDES permit.**

Mr. Dan Warner:

*Lehigh Southwest Cement* (Lehigh) has reviewed the Waste Discharge Requirements (WDRs) for the *JF Shea Construction Inc's* Fawndale Rock and Asphalt facility. Lehigh is concerned over the proposal to use Maximum Contaminant Levels (MCLs) for aluminum, iron, and manganese to establish receiving water limitations. The proposed limits, 200 µg/L for aluminum, 300 µg/L for iron, and 50 µg/L for manganese, are not appropriate indicators of surface water quality. Aluminum, iron and manganese are naturally occurring components of the earth's crust. Naturally occurring levels of suspended sediment will cause exceedances of the proposed receiving water limits.

This is evident from monitoring data from the entire mainstem of the Sacramento River, which routinely exceed the proposed receiving water limits without posing a threat to attainment of secondary MCLs in actual drinking water supplies (see attached Table of data from a recent USGS study titled "Water-Quality Assessment of the Sacramento River Basin, California: Water-Quality, Sediment and Tissue Chemistry, and Biological Data, 1995-1998 (Open-File Report 2000-391), Sacramento River Trace Metals Study."

Drinking water suppliers remove particles by filtration and coagulation, ensuring attainment of the MCLs. The Regional Board needs to carefully think through how to implement MCLs as objectives. That approach should be peer reviewed by scientists from the United States Geological Survey, the University of California, and the Department of Health Services. The proposed limits for aluminum, iron, and manganese send the wrong message to the public about indicators for surface water quality. This

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diverts attention and resources from significant issues and effective pollution control measures. It also puts regulated facilities in unnecessary jeopardy of violations where no impairment is at issue and to no environmental benefit. The proposed receiving limits for aluminum, iron, and manganese should be removed.

If you have any questions, or need additional information please do not hesitate to contact me at 530-275-1581 ext. 3317.

Sincerely,

**LEHIGH SOUTHWEST CEMENT COMPANY**

A handwritten signature in black ink, appearing to read "Michael Meinen", written over a horizontal line.

Michael Meinen  
Environmental Engineer

"Water-Quality Assessment of the Sacramento River Basin, California: Water-Quality, Sediment and Tissue Chemistry, and Biological Data, 1995-1998 (Open-File Report 2000-391), Sacramento River Trace Metals Study Agency-USGS

Trace elements in unfiltered water samples

Site	Date	Split replicate	Sediment Conc. mg/L	Aluminum $\mu\text{g/L}$ IC PMS/IC PAUS	Iron $\mu\text{g/L}$ UV-VIS	Manganese $\mu\text{g/L}$ IC PMS
Sacramento River below Shasta Dam, CA	11/19/96	1,2	7	23 $\pm$ 4	30 $\pm$ 0	21 $\pm$ 1
Sacramento River below Shasta Dam, CA	12/12/96	1,2	2	97 $\pm$ 3	51 $\pm$ 64	7.9 $\pm$ 0.4
Sacramento River above Bend Bridge near Red Bluff, CA	09/20/96	1,2	4	131 $\pm$ 5	122 $\pm$ 60	7.4 $\pm$ 0.3
Sacramento River below Keswick Dam, CA	12/11/96	1,2	3	137 $\pm$ 2	101 $\pm$ 64	12 $\pm$ 0
Sacramento River below Keswick Dam, CA	07/11/96	1,2	5	175 $\pm$ 14	40 $\pm$ 0	4.2 $\pm$ 0.3
Sacramento River below Shasta Dam, CA	07/12/96	1,2	3	200 $\pm$ 1	105 $\pm$ 2	3.5 $\pm$ 0.2
Sacramento River above Bend Bridge near Red Bluff, CA	07/11/96	1,2	5	223 $\pm$ 3	181 $\pm$ 4	6.5 $\pm$ 0.2
Sacramento River below Keswick Dam, CA	11/21/96	1,2	3	243 $\pm$ 31	132 $\pm$ 64	22 $\pm$ 2
Sacramento River at Freeport, CA	11/12/96	1,2	12	323 $\pm$ 29	261 $\pm$ 7	21 $\pm$ 1
Sacramento River below Keswick Dam, CA	03/28/97	1,2	8	390 $\pm$ 17	167 $\pm$ 6	7.2 $\pm$ 0.5
Sacramento River above Bend Bridge near Red Bluff, CA	05/30/97	1,2	14	396 $\pm$ 16	214 $\pm$ 5	9.6 $\pm$ 0.6
Sacramento River below Shasta Dam, CA	05/29/97	1,2	7	397 $\pm$ 23	152 $\pm$ 3	5.1 $\pm$ 0.4
Sacramento River above Bend Bridge near Red Bluff, CA	11/22/96	1,2	15	558 $\pm$ 55	355 $\pm$ 64	28 $\pm$ 2
Sacramento River at Colusa, CA	09/23/96	1,2	30	559 $\pm$ 25	406 $\pm$ 64	20 $\pm$ 2
Sacramento River below Keswick Dam, CA	01/03/97	1,2	11	609 $\pm$ 5	436 $\pm$ 64	25 $\pm$ 0
Sacramento River at Freeport, CA	09/24/96	1,2	28	737 $\pm$ 70	540 $\pm$ 64	34 $\pm$ 3
Sacramento River at Freeport, CA	06/05/97	1,2	18	802 $\pm$ 36	603 $\pm$ 26	31 $\pm$ 1
Sacramento River at Freeport, CA	07/17/96	1,2	20	865 $\pm$ 12	745 $\pm$ 64	30 $\pm$ 1
Sacramento River at Colusa, CA	06/03/97	1,2	37	1,012 $\pm$ 23	471 $\pm$ 17	30 $\pm$ 2
Sacramento River at Colusa, CA	11/13/96	1,2	46	1,062 $\pm$ 53	771 $\pm$ 64	25 $\pm$ 0
Sacramento River at Colusa, CA	11/14/96	1,2	24	1,127 $\pm$ 58	450 $\pm$ 64	55 $\pm$ 2
Sacramento River at Verona, CA	06/04/97	1,2	38	1,181 $\pm$ 137	532 $\pm$ 15	48 $\pm$ 2
Sacramento River at Verona, CA	07/18/96	1,2	28	1,201 $\pm$ 129	1,062 $\pm$ 64	33 $\pm$ 1
Sacramento River at Verona, CA	09/26/96	1,2	32	1,602 $\pm$ 37	1,365 $\pm$ 64	44 $\pm$ 0
Sacramento River above Bend Bridge near Red Bluff, CA	12/12/96	1,2	31	1,733 $\pm$ 36	1,057 $\pm$ 64	31 $\pm$ 1
Sacramento River at Verona, CA	12/18/96	1,2	52	1,770 $\pm$ 31	986 $\pm$ 64	49 $\pm$ 1
Sacramento River at Freeport, CA	12/12/96	1,2	64	2,016 $\pm$ 109	983 $\pm$ 64	55 $\pm$ 0
Sacramento River at Colusa, CA	07/16/96	1,1	32	2,357 $\pm$ 278	1,607 $\pm$ 11	50 $\pm$ 3
Sacramento River at Colusa, CA	12/16/96	1,2	31	3,383 $\pm$ 142	1,857 $\pm$ 64	82 $\pm$ 1
Colusa Basin Drain at Road 199E near Knights Landing, CA	06/06/97	1,2	154	5,221 $\pm$ 174	1,980 $\pm$ 213	284 $\pm$ 3
Sacramento River above Bend Bridge near Red Bluff, CA	01/03/97	1,2	355	6,029 $\pm$ 1,012	2,318 $\pm$ 64	146 $\pm$ 2
Yolo Bypass at Interstate 80 near West Sacramento, CA	01/07/97	1,2	183	8,889 $\pm$ 359	3,873 $\pm$ 64	206 $\pm$ 5
Sacramento River at Freeport, CA	01/06/97	1,2	193	9,786 $\pm$ 1,627	3,398 $\pm$ 64	201 $\pm$ 1
Sacramento River at Colusa, CA	01/04/97	1,2	579	21,567 $\pm$ 276	6,669 $\pm$ 64	467 $\pm$ 2