INFORMATION COLLECTION REQUEST:

For purposes of consistency, and clear communication between the U.S. Environmental Protection Agency ("EPA") and Lehigh, unless specifically noted, EPA will use descriptions of the Permanente Plant located at 24001 Stevens Creek Boulevard in Santa Clara County, CA (hereinafter referred to as the "site" or "facility"), and features on the site, as described by Lehigh in its November 30, 2011 "Report of Waste Discharge for the Permanente Plant" ("ROWD") that was submitted to the California Regional Water Quality Control Board, San Francisco Bay Region ("Regional Board").

1. Describe in detail the relationship between Lehigh and any parent corporation, subsidiary and/or any other entity having an ownership interest or operating at the site. This includes, but is not limited to, Heidelberg Cement and Hanson Permanente Cement ("Hanson"). For any parent corporation, subsidiary and/or any other entity having an ownership interest or operating at the site provide its name, current mailing address, a contact person, telephone number and state of incorporation and principal place of business. As part of this response provide document(s) that demonstrate the relationship between Lehigh and any parent corporation, subsidiary and/or any other entity having an ownership interest or operating at the site.

    a. Identify the state where Lehigh is incorporated and the state of Lehigh's principal place of business. As part of this response provide document(s) that demonstrate the state where Lehigh is incorporated and the state of Lehigh's principal place of business.

2. Provide a chronological list of the current and former owners and operators of the site. The list should provide the specific periods of time the site was owned and/or operated by a particular entity and the details of any transaction that resulted in the transfer of ownership of the site and/or resulted in a new operator of the site.

    a. As part of the ROWD Lehigh identified Lehigh as the operator of the site. Provide the dates on which Lehigh has been the operator of the site and document(s) demonstrating Lehigh as the operator of the site.

    b. As part of the ROWD Lehigh identified Hanson as the owner of the site. Provide the dates in which Hanson has been the owner of the site and document(s) demonstrating Hanson as the owner of the site, including, but not limited to, the title or other ownership document. As part of this response, provide details of Hanson's activities at the site, including, but not limited to, a description of the activity conducted by Hanson related to the operation of the site.

3. Identify and provide copies of all permits from any federal, state or local regulatory agency that apply or have applied to the facility with respect to surface water, wetlands, groundwater, soil and waste disposal.

4. Identify and provide copies of all environmental investigations and/or reports that were completed for the site by Lehigh, Hanson, a parent corporation and/or subsidiary, a consultant and/or contractor, or by anyone else under the direction of Lehigh.

5. Provide documentation of all data from rain gauges, or other similar mechanism(s) utilized on site, to identify the levels of precipitation that fell on the site from May 2007 to the present.

    a. Describe the type of rain gauge, or other similar mechanism(s), and describe how it is used, including how often it is checked and emptied and how records of the rain data are maintained.

    b. If Lehigh does not operate or maintain a rain gauge, or other mechanism(s), on site, identify how Lehigh monitors precipitation related events and the amount of stormwater on the site.

6. Identify and describe all point sources that are known, or should reasonably be known, to Lehigh, that may discharge pollutants to Permanente Creek or any other surface water and/or wetland on the site. The term "point source" is defined at 33 U.S.C. § 1362(14) and means any discernible, confined or discrete conveyance. When identifying all point sources list the latitude and longitude of the point source to the nearest 15 seconds. EPA also requests that Lehigh identify each point source on a map that reasonably depicts the facility and each point source at the facility. The scope of Lehigh's response should include, but is not limited to, all point sources that discharge storm water and/or process waste water whether or not those point sources are permitted by a federal, state or local regulatory agency. As part of this response Lehigh is specifically requested to identify and describe the previously unidentified outfall located below Pond 4A observed by EPA, during the March 26, 2012 site visit, to be discharging to Permanente Creek and that was brought to the attention of Mr. Scott Renfrew by Greg Gholson of EPA.

    a. Lehigh is requested to explain in detail the source of the discharge from each point source identified in Paragraph 6 and characterize the discharge as either stormwater or process waste water.

    b. Lehigh is requested to identify what pollutants have been identified as being discharged from each point source identified in Paragraph 6 from May 2007 to the present. As part of this response provide any sampling and/or monitoring results that have been conducted for each point source identified in Paragraph 6.

7. For those point sources identified in Paragraph 6 identify what, if any, permit from a federal, state or local regulatory agency Lehigh believes *currently* covers the discharge from each point source.

4. Identify and provide copies of all environmental investigations and/or reports that were completed for the site by Lehigh, Hanson, a parent corporation and/or subsidiary, a consultant and/or contractor, or by anyone else under the direction of Lehigh.

5. Provide documentation of all data from rain gauges, or other similar mechanism(s) utilized on site, to identify the levels of precipitation that fell on the site from May 2007 to the present.

    a. Describe the type of rain gauge, or other similar mechanism(s), and describe how it is used, including how often it is checked and emptied and how records of the rain data are maintained.

    b. If Lehigh does not operate or maintain a rain gauge, or other mechanism(s), on site, identify how Lehigh monitors precipitation related events and the amount of stormwater on the site.

6. Identify and describe all point sources that are known, or should reasonably be known, to Lehigh, that may discharge pollutants to Permanente Creek or any other surface water and/or wetland on the site. The term "point source" is defined at 33 U.S.C. § 1362(14) and means any discernible, confined or discrete conveyance. When identifying all point sources list the latitude and longitude of the point source to the nearest 15 seconds. EPA also requests that Lehigh identify each point source on a map that reasonably depicts the facility and each point source at the facility. The scope of Lehigh's response should include, but is not limited to, all point sources that discharge storm water and/or process waste water whether or not those point sources are permitted by a federal, state or local regulatory agency. As part of this response Lehigh is specifically requested to identify and describe the previously unidentified outfall located below Pond 4A observed by EPA, during the March 26, 2012 site visit, to be discharging to Permanente Creek and that was brought to the attention of Mr. Scott Renfrew by Greg Gholson of EPA.

    a. Lehigh is requested to explain in detail the source of the discharge from each point source identified in Paragraph 6 and characterize the discharge as either stormwater or process waste water.

    b. Lehigh is requested to identify what pollutants have been identified as being discharged from each point source identified in Paragraph 6 from May 2007 to the present. As part of this response provide any sampling and/or monitoring results that have been conducted for each point source identified in Paragraph 6.

7. For those point sources identified in Paragraph 6 identify what, if any, permit from a federal, state or local regulatory agency Lehigh believes *currently* covers the discharge from each point source.

a. In addition, for the same point sources identified in Paragraph 6, identify what permit Lehigh believes covered discharges from each point source from May 2007 to the present.

b. For any discharges from the point sources identified in Paragraph 6 that do not currently have permit coverage, or did not have permit coverage from May 2007 to the present, describe in detail why the discharges did not have permit coverage.

8. Identify any discharges from the site that Lehigh believes are subject to effluent limitations in any Effluent Limitations Guidelines ("ELGs") in 40 C.F.R. Subchapter N. Identify the ELGs by regulatory citation and describe which discharge from the site the ELGs apply to, including a narrative description of the location of the discharge and the source of the pollutants that may be discharged from that location. Provide all discharge or other water monitoring data that measures any of the parameters in the ELGs.

9. Identify all sampling and/or monitoring of discharges that identified pollutants at levels that exceeded applicable water quality standards from May 2007 to the present. As part of this response provide the date of the discharge, the location of the discharge and provide copies of the sampling and/or monitoring result(s).

10. Identify on a map(s) and/or diagram(s) all surface waters, including wetlands. As part of this response provide a detailed description of the surface waters and wetlands and include copies of any wetland delineation reports prepared by consultants and/or any jurisdictional determinations made by the U.S. Army Corps of Engineers specific to "waters of the United States" located on or adjacent to Lehigh's facility.

11. Identify whether the site is under either interim status or operates under a permit pursuant to the Resource Conservation and Recovery Act ("RCRA") subtitle C.

    a. Describe in detail whether Lehigh treats, stores or disposes of hazardous waste at the site.

12. Identify on a map(s) and/or diagram(s) all landfills, land application areas, and open dumps on the site and provide a detailed description of the activity on the site associated with the production of the waste or other materials deposited in the landfills, land application areas, and open dumps.

13. Identify the Standard Industrial Classification ("SIC") Code(s) for the site and the method utilized to arrive at this determination. As part of this response demarcate on a map(s) and/or diagram(s) of the facility the location and geographic extent of the industrial activities corresponding to each SIC Code(s).

<u>Quarry, Pond 4A, and West Materials Storage Area</u>

14. Describe in detail what types of activity occur inside the Quarry and within the drainage area of the site that flows into the Quarry. If applicable, identify each activity by SIC code, in addition to providing a narrative description of each activity.

15. Describe the type, source and volume of all materials stored and/or disposed of in the West Material Storage Area. This includes overburden, waste rock, industrial process wastes (e.g. rock plant mud cake) and any other waste streams disposed of or stored within the West Material Storage Area.

16. Describe in detail if and how storm water flows from the West Material Storage Area into the bottom of the Quarry via the West Materials Storage Area Drainage.

    a. Describe in detail any sampling and/or monitoring of the storm water runoff from the West Material Storage Area to the Quarry. Provide the dates and any results of such sampling and/or monitoring activities.

    b. Describe in detail any sampling and/or monitoring activities of what Lehigh has characterized as "5 acres of historically mined material" in the West Material Storage Area. Provide the dates any results of such sampling and/or monitoring activities.

    c. Describe in detail the source of the "historically mined material," including a detailed description of the industrial process in which the material was used and/or created on the site and how it was disposed of at the West Material Storage Area. Include in this response a detailed description of what Lehigh means by "historically mined material," including what pollutants are or may be present in the material and the amount and dates of the material disposed of at the West Material Storage Area.

17. Describe in detail how, what Lehigh characterizes as "mine drainage," is pumped from the Quarry bottom to Pond 4A and from Pond 4A to Permanente Creek. Include a detailed description of the pipes and other conveyances that are used to transport the "mine drainage" from the Quarry to Permanente Creek.

    a. Identify the source(s) of the water that collects in the Quarry bottom.

    b. Describe the pollutant(s) that have been identified in the water at the Quarry bottom. Identify the dates and provide any sampling and/or monitoring results for the water in the bottom of the Quarry.

    c. Describe the pollutant(s) that have been identified in discharges from Pond 4A to Permanente Creek. Identify the dates and provide any sampling and/or monitoring results for the discharge of the Quarry "mine drainage" into Pond 4A and the discharge from Pond 4A to Permanente Creek.

18. Describe in detail what treatment control(s) are currently being utilized by Lehigh to control the discharge of pollutants from the Quarry and/or Pond 4A. In this response give the location on the site where the treatment control(s) were installed and the purpose of the treatment control(s).

a. Explain how Lehigh believes those treatment control(s) described in Paragraph 18 comply with Section B of the California Storm Water General Permit for Discharges of Storm Water Associated with Industrial Activity Excluding Construction Activities, Water Quality Order No. 97-03-DWQ, General Permit No. CAS000001 ("Industrial Storm Water General Permit") (pages 3-4).

b. Explain how Lehigh believes the treatment controls described in Paragraph 18 are the best available technology economically available ("BAT") and the best conventional pollutant control technology ("BCT") for reducing or preventing the discharge of pollutants.

c. Explain how Lehigh believes the treatment controls described in Paragraph 18 comply with Section C.1 of the Industrial Storm Water General Permit (page 4).

d. Explain how Lehigh believes the treatment controls described in Paragraph 18 comply with Section C.2 of the Industrial Storm Water General Permit (page 4).

19. If different than current treatment control(s) described in Paragraph 18, describe what treatment controls were in place to control the discharge of pollutants from the Quarry and/or Pond 4A between May 2007 and the present. In this response give the date(s) in which particular treatment control(s) were installed, the location on the site where the treatment control(s) were utilized and the purpose of the treatment control(s).

    a. Explain how those treatment control(s) described in Paragraph 19 comply with Section B of the Industrial Storm Water General Permit (pages 3-4).

    b. Explain how the treatment control(s) described in Paragraph 19 are the best available technology economically available ("BAT") and the best conventional pollutant control technology ("BCT") for reducing or preventing the discharge of pollutants.

    c. Explain how the treatment control(s) described in Paragraph 19 comply with Section C.1 of the Industrial Storm Water General Permit (page 4).

    d. Explain how the treatment control(s) described in Paragraph 19 comply with Section C.2 of the Industrial Storm Water General Permit (page 4).

20. Describe the rate and volume of flow from the Quarry to Pond 4A and from Pond 4A to Permanente Creek. In this response include any monitoring of the rate of flow and the date(s) in which the flow was monitored.

    a. Describe in detail the factors that influence the rate and volume of flow from the Quarry to Pond 4A and from Pond 4A to Permanente Creek.

East Materials Storage Area and Pond 30

21. Describe in detail what types of activity occur inside the East Materials Storage Area and within the drainage area of the site that flows into Pond 30. If applicable, identify each activity by SIC code, in addition to providing a narrative description of each activity.

22. Describe the type, source and volume of all materials stored and/or disposed of in the East Materials Storage Area. This includes overburden, waste rock, industrial process wastes (e.g. cement kiln bricks, clinker, former aluminum plant waste materials, etc.) and any other waste streams disposed of or stored within the East Materials Storage Area.

23. Describe in detail if and how storm water flows from the East Material Storage Area into Pond 30 (via the East Materials Storage Area Drainage) to Permanente Creek.

    a. Describe in detail any sampling and/or monitoring of the storm water runoff from the East Material Storage Area to Pond 30 and from Pond 30 to Permanente Creek. Provide the date(s) and any result(s) of such sampling and/or monitoring activities.

    b. Describe the industrial process in which the material was used and/or created on the site and how it was disposed of at the East Material Storage Area. Include in this response a detailed description of what pollutants are present in the material and the amount and dates of the material disposed of at the East Material Storage Area.

24. Describe in detail if and how storm water flows from the East Material Storage Area to Permanente Creek through any conveyance other than Pond 30.

Primary Crusher and Pond 13A and 13B

25. Identify the dates from May 2007 to the present when the Primary Crusher was in operation.

26. Describe in detail under what factual circumstances the operation of the Primary Crusher results in the generation of process waste water.

27. Identify the dates from May 2007 to the present when the Primary Crusher discharged process waste water to Pond 13A and/or Pond 13B.

28. Identify the dates from May 2007 to the present when process waste water and/or process waste water commingled with storm water discharged from Pond 13A and/or Pond 13B to Permanente Creek.

29. Describe in detail what types of activity occur inside the area of the Primary Crusher and within the drainage area of the site that flows through the area of the Primary Crusher and/or Ponds 13A and 13B. If applicable, identify each activity by SIC code, in addition to providing a narrative description of each activity.

30. Describe in detail how storm water and/or process water flows into Ponds 13A and 13B and how that process water is discharged to Permanente Creek. Include in this response a detailed description of the inlet of the overflow pipe which runs down the bank to Permanente Creek.

31. In the ROWD, Section 2.2, Lehigh states: "Pond 13B has an overflow structure but typically the water seeps through the pond sides and bottom and surfaces at the bank of [Permanente] Creek." Describe in more detail the hydrologic connection between Pond 13B and Permanente Creek, including, but not limited to, the frequency and volume of flow between Pond 13B and Permanente Creek, the distance between Pond 13B and Permanente Creek and any other factors that may influence the exchange of water between Pond 13B and Permanente Creek.

32. Identify every instance when Pond 13B discharged through the overflow structure to Permanente Creek from May 2007 to the present, including the date(s) of discharge and whether any monitoring and/or sampling was performed. If any monitoring and/or sampling was performed provide EPA with copies of the results.

33. In the ROWD, Section 2.2, Lehigh states that "[t]hese outfalls [including Pond 13B] also combine stormwater associated with industrial activity with process water; thus the commingled discharge is characterized as process water for purposes of this application." Describe in detail how stormwater that drains to Ponds 13A and 13B commingles with process waste water associated with the Primary Crusher that is discharged to Ponds 13A and 13B.

    c. Identify what permit Lehigh believes authorized discharges from Pond 13B to Permanente Creek prior to July 15, 2011. As part of this response, explain in detail the controls utilized on site to minimize the discharge of pollutants from the Primary Crusher and Pond 13B to Permanente Creek.

<u>Rock Plant Access Road and Pond 17</u>

34. Describe in detail what types of activity occur inside the area of the Rock Plant and with the drainage area of the site that flows through the area of the Rock Plant and/or Pond 17. If applicable, identify each activity by SIC code, in addition to providing a narrative description of each activity.

35. Describe in detail how storm water and/or process water flows into Pond 17 and how that process water is discharged to Permanente Creek. Include in this response a detailed description of the overflow pipe and how the discharge from the overflow pipe reaches Permanente Creek.

36. In the ROWD, Section 2.2, Lehigh states that "[t]hese outfalls [including Pond 17] also combine stormwater associated with industrial activity with process water; thus the commingled discharge is characterized as process water for purposes of this application." In addition, in Section 2.2, when specifically discussing discharges from Pond 17 Lehigh

states: "[s]imilar to Pond 9, this contact with the process water entrained in the material characterizes the water as process water." Describe in detail how stormwater that drains to Pond 17 commingles with process water.

a. Identify what permit Lehigh believes authorized discharges from Pond 17 to Permanente Creek prior to July 15, 2011. As part of this response, explain in detail the controls utilized on site to minimize the discharge of pollutants from the Rock Plant and Pond 17 to Permanente Creek.

37. In the ROWD, Section 2.2, Lehigh states: "Pond [17] typically discharges in response to storm events." Identify every instance when Pond 17 discharged to Permanente Creek from May 2007 to the present, including the dates of discharge and whether any monitoring and/or sampling was performed. If any monitoring and/or sampling was performed provide EPA with copies of the results.

Pond 9, Pond 11 and Cement Plant Reclaim Water Process/Storm Water Subsystem

38. Describe in detail what types of activity occur inside the area that drains to Ponds 9 and 11 and that drains to the Cement Plant Reclaim Water Process/Stormwater Subsystem. If applicable, identify each activity by SIC code, in addition to providing a narrative description of each activity.

39. In the ROWD, Section 2.2, Lehigh states that "[t]hese outfalls [including Pond 9] also combine stormwater associated with industrial activity with process water; thus the commingled discharge is characterized as process water for purposes of this application." In addition, in Section 2.2, when specifically discussing discharges from Pond 9 Lehigh states: "[t]he fine material removed from the aggregate in the Rock Plant is hauled to deposit locations on the road and be washed into Pond 9. This pond also receives water pumped from Pond 11..." Describe in more detail how stormwater that drains or is pumped to Pond 9 commingles with process water.

d. Identify what permit Lehigh believes authorized discharges from Pond 9 to Permanente Creek prior to July 15, 2011. As part of this response, explain in detail the controls utilized on site to minimize the discharge of pollutants from Pond 9, Pond 11 and the Cement Plant to Permanente Creek.

Emergency Bypass

40. Describe in detail the factual circumstances that causes Lehigh to utilize the "Emergency Discharge Point" described in the ROWD.

a. Describe in detail what factual circumstances currently cause the capacity of Reclaim Water Tank A to be exceeded.

b. If different than Paragraph 35.a, describe in detail what factual circumstances caused the capacity of Reclaim Water Tank A to be exceeded from May 2007 to the present. As part of this response describe in detail what factual circumstances

resulted in capacity of Reclaim Water Tank A to be exceeded and whether and how these causes have been addressed.

c. Describe in detail what factual circumstances currently cause the capacity of Pond 11 to be exceeded.

d. If different than Paragraph 35.c, describe in detail what factual circumstances caused the capacity of Pond 11 to be exceeded from May 2007 to the present. As part of this response describe in detail what factual circumstances resulted in capacity of Pond 11 to be exceeded and whether and how these causes have been addressed.

e. Identify, describe in detail and provide date(s) of when Pond 11 exceeded capacity. As part of this response describe whether the capacity is or, ever has been, exceeded even when there is no precipitation related event associated with the exceedance.

f. For each date(s) Pond 11 exceeded capacity describe in detail the direction of the flow from Pond 11.

g. Describe in detail circumstances in which the "Emergency Discharge Point" was utilized even when Reclaim Water Tank A and/or Pond 11 did not exceed capacity. Provide dates from May 2007 to the present when the "Emergency Discharge Point" was utilized even when Reclaim Tank A and/or Pond 11 did not exceed capacity.

h. When Lehigh uses the "Emergency Discharge Point" describe in detail how and where the stormwater and/or process waste water is discharged.

i. Identify the date(s) when Lehigh used the "Emergency Discharge Point" from May 2007 to the present. As part of this response provide a narrative response detailing the circumstances that required the use of the "Emergency Discharge Point" for each date(s).

j. Describe whether when Lehigh uses the "Emergency Discharge Point" process waste water will be discharged to Permanente Creek.

k. When the "Emergency Discharge Point" is utilized what treatment controls are being used by Lehigh to ensure the reduction or prevention of pollutants in this discharge.

l. When the "Emergency Discharge Point" is utilized what treatment controls are being used by Lehigh to ensure that discharges will not cause or contribute to an exceedance of any applicable water quality standards.

m. Identify what person at Lehigh is responsible for determining when the "Emergency Discharge Point" is utilized. In addition, identify what person operates the "Emergency Discharge Point" when it is determined that it is to be utilized. If either person(s) identified are different than person(s) that performed such tasks in the past, identify the person(s) who in the past performed such operations from May 2007 to the present and the time period in which they performed such operations.

n. Describe any sampling and/or monitoring of the discharge from the "Emergency Discharge Point" to Permanente Creek. Provide the dates and results from the sampling and/or monitoring.

Truck Wash and Pond 20

41. Describe in detail where on the site vehicles, including, but not limited to trucks, are maintained and the maintenance activities performed. In this response include, at a minimum, a description of maintenance activities such as vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication. As part of this response include the frequency of the maintenance activities and the volume and identification of any pollutants used and/or generated during maintenance activities.

42. Describe in detail where on the site equipment, including, but not limited to trucks, are cleaned and the cleaning activities performed. As part of this response include the frequency of the cleaning activities and the volume and identification of any pollutants used and/or generated during cleaning activities.

43. Describe in detail how water utilized in the spray truck wash system flows from the truck wash area to Pond 20 and from Pond 20 to Permanente Creek.

44. Identify the volume of water used for the spray truck wash system on a daily basis (include in this response the time frame, and any changes to volume of truck wash water, dates of changes, and current practices).

45. Identify every instance from May 2007 to the present when the truck wash water flowed into Pond 20 as opposed to, or in addition to, being pumped to Reclaim Tank A. In this response include the dates of discharge and whether any monitoring and/or sampling was performed. If any monitoring and/or sampling was performed provide copies of the results.

    a. Identify what size storm event will resulted in truck wash water flowing to Pond 20 as opposed to being pumped to Reclaim Tank A.

    b. Describe what happens when there is a pump failure at the concrete sump pump at the base of the slope below the Aluminum Plant that results in truck wash water flowing to Pond 20 as opposed to being pumped to Reclaim Tank A.

c. Identify the volume and/or rate and duration of truck wash water that will result in truck wash water flowing to Pond 20 as opposed to being pumped to Reclaim Tank A.

46. Identify every instance from May 2007 to the present when Pond 20 discharged to Permanente Creek. In this response include the dates of discharge and whether any monitoring and/or sampling was performed. If any monitoring and/or sampling was performed provide copies of the results.

47. In the ROWD, Section 2.2, Lehigh states that "[t]hese outfalls [including Pond 20] also combine stormwater associated with industrial activity with process water; thus the commingled discharge is characterized as process water for purposes of this application." In addition, in Section 2.2, when specifically discussing discharges from Pond 20 Lehigh states: "[t]he mixture of this wash water would then make the discharge from Pond 20 process water." Describe in detail how stormwater that drains to Pond 20 commingles with the truck wash water and any other process waste water.

a. Identify what permit Lehigh believes authorized discharges from Pond 20 to Permanente Creek prior to July 15, 2011. As part of this response, explain in detail the controls utilized on site to minimize the discharge of pollutants from Pond 20 to Permanente Creek.

Quarry Extraction Activities

48. Identify the total tonnage of all materials extracted from the quarry during calendar years 2007, 2008, 2009, 2010, 2011 and year-to-date estimates for 2012, including, but not limited to, limestone, waste rock, and/or overburden.

49. Provide an annual breakdown of the chemical composition of each category of material extracted (e.g. limestone, waste rock, overburden) and the tonnage associated with each chemical constituent.

50. Provide a list of products manufactured on-site during calendar years 2007, 2008, 2009, 2010, 2011 and year-to-date estimates for calendar year 2012 along with any analytical results associated with the products.

51. Provide analytical results for all materials disposed of or stored within surface impoundments on-site (e.g. West Material Storage Area, East Material Storage Area) and the total tonnage associated with each chemical constituent discharged or stored in surface impoundments onsite. Organize this response according to which surface impoundment (e.g. West Material Storage Area, East Material Storage Area) the material was discharged or stored in.

52. Provide a detailed description of the sources that Lehigh consulted to respond to the above items (e.g., written records, current and/or former employees, etc.). As part of this response,

provide the names and position with the associated company for each current and/or former employee consulted.