

WP#12 @ entrance gate

**California Regional Water Quality Control Board
General Industrial Activities Storm Water Permit, Order No. 97-03-DWQ
NPDES Permit No. CAS000001**

INDUSTRIAL STORM WATER INSPECTION REVIEW CHECKLIST

PRE-INSPECTION FILE REVIEW AND GENERAL INSPECTION INFORMATION			
WDID Number (6 digits) 2-43I00 6267	Inspection Date 2/10/10	Arrival/Departure Times 0811 1703 w/ exit	Weather Conditions Most recent rain yesterday & past several weeks
Facility Name (aka Hanson Permanente Cement) Lehigh Southwest Cement, Co.			
Facility Address (Include Street Number, City, and Zip) 24001 Stevens Creek Blvd. Cupertino, CA			
Facility Contacts Present During Inspection (Name and Title) Scott Renfrow Wilbur Green		Contact Phone Number Henrik W.	
SIC Code 3241	Type of Industrial Activity Hyd. Cement. No Table D	Facility Size 3500 ac.	% Impervious
Group Monitoring Plan Name (If applicable) N/A per 08/09 AR.		NOI Filing Date	Name of Receiving Water Permanente Creek
Purpose of Inspection: <input checked="" type="checkbox"/> Compliance Inspection (B Type Inspection) <input type="checkbox"/> Non-Compliance or Enforcement Follow-Up Inspection <input type="checkbox"/> Other: Explain _____		Inspection Pre Announced? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 2/8/10 @ 2:45 P. Photographs Taken? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

- RB → sample pts represent: Non-SW d/c, source water? d/c? check?
 1. Dust suppression water } not active @ time of inspection due to recent rains
 2. Wash down water

(AI) - Quarry pit GW downstair permitted? d/c above Pond 13
 - AST @ Auxiliary Kibin Ditch ~~stair~~
 - Kibin bag house
 * wash rock
 - Soil stabilization efforts
 - WPPPP review
 cement mfg. facility (dry?) not concrete
 • active quarry, conveyor systems, crushers & mills, a pre-calcing tower(?), &
 rotary cement kilns
 • monitoring data record (1996). How informed -

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ANNUAL REPORT EVALUATION (B14)				
08-09	Included	Not Included	Not Adequate	Comments
Submit an Annual Report for the proceeding year (B14) ✓	✓			Full records review not conducted.
Perform four quarterly visual observations for Authorized non-storm water discharges (documented in Form 2?)				
Perform four quarterly visual observations for Unauthorized non-storm water discharges (documented in Form 3?)				
Perform monthly visual storm water discharge observations during wet season (Oct 1 - May 30) (document discharge characteristics)				
Collect storm water samples, 1st storm of the rainy season and one other				
Samples analyzed for the required parameters (including Table D if applicable)				
Collect samples from all discharge locations that represent the quality and quantity of storm water discharges				
Are analytical results within EPA and Regional benchmark threshold values? (see next page for results)				

(AI) verbally requested underlying data feeding AR. Specifically example of Visual Ins datasheets & most recent AC final records.

- Sampling COCs/analytical data corresponding to draft results provided.

SWPPP EVALUATION (SECTION A PAGE 11 OF THE GENERAL PERMIT)

SWPPP prepared by (Facility Rep or Consultant) <u>URS</u>		Date Prepared & Most Recent Revision # <u>14</u>		
	Included	Not Included	Not Adequate	Comments
Develop and retain SWPPP on-site (A.10)	✓			<u>Full records review not conducted</u>
Identify and update pollution prevention team and identify responsibilities (A.3)	✓			
Develop and/or promptly update site map (A.4)				
Site map should include facility boundaries, drainage areas, direction of flow, on-site water bodies, run-on, areas of soil erosion, municipal storm drain inlets, points of discharge, structural control measures, impervious areas, location of directly exposed material, location of significant spills/leaks, storage areas/tanks, shipping/receiving areas, fueling areas, vehicle and equipment storage/maintenance material handling/processing, waste treatment/disposal, dust/particulate generation, cleaning areas, other areas of industrial activities				
List of significant materials (A.5)				
Materials include raw, intermediate, finished, waste, and recycled materials. For each material listed the locations, typical quantity, and frequency used should be described.				
Describe potential pollution sources (A.6) (industrial processes, material/handling areas, dust/particulate generating activities, significant spills/leaks, NSWD, and soil erosion)				
Assessment of potential pollutant sources (A.7) (summarize areas likely to be sources of pollutants and pollutants likely to be present)				
Propose site-specific BMPs (A.8) (see next page for details related to BMPs)				
Sign and certify SWPPP (C.9 and C.10)				
Annual Comprehensive Site Compliance Evaluation (A.9)				
Review of visual observations, inspections, and sampling analysis; visual inspection of potential pollution sources, review and evaluation of BMPs, evaluation report; the SWPPP shall be revised, as appropriate, and the revisions implemented within 90 days of the evaluation.				

SAMPLING AND ANALYSIS EXEMPTIONS AND REDUCTIONS (SECTION B.12 PAGE 31)

	Yes	No	Comments
Has the facility filed for a Sampling and Analysis Exemption and Reduction certification in accordance with B.12? If yes explain which certification the facility has filed for.			

MONITORING PROGRAM AND REPORTING EVALUATION (SECTION B PAGE 24 OF THE GENERAL PERMIT)

	Included	Not Included	Not Adequate	Comments
Develop and implement written storm water monitoring program (B.1)	✓			Full records remain not conducted
Describe quarterly non-storm water discharge visual observation schedule (B.3)				
Quarterly NSW D visual observation to be conducted Jan-March, April-June, July-Sept, Oct-Dec; during daylight hours on days with no storm water discharge for all drainage areas; look for presence of unauthorized NSW Ds, observe authorized NSW D, maintain observation records				
Describe storm water discharge visual observation schedule (B.4)				
Visual observation of discharge from one storm water event per month during wet season (Oct 1 – May 31); observe during first hour of discharge, all drainage areas, observed stored or contained storm water at time of discharge, preceded by three working days of dry weather, document discharge characteristics: presence of floating/suspended material, oil and grease, discolorations, turbidity, odor, and source of any pollutants. Records maintained of observation dates, locations, observations, and response taken to reduce or prevent pollutants in storm water discharges				
Describe sampling/analysis methodology (B.5)				
Samples to be collected during first hour of discharge, collected from all discharge locations, and preceded by at least 3 working days without storm water discharge; samples collected from first storm event and one additional storm during wet season; sample for pH, TSS, SC, TOC or O&G, toxic chemicals or other pollutants likely present, and other analytical parameters listed in Table D (if no, explain or specify reason provided in plan)				
Describe sampling locations (B.7) (must represent the quality and quantity of discharge)				
Describe sampling methods (B.10) (analytical methods, method detection limits; QA/QC methods)				
Retention of all records for at least five years (B.13) (including annual reports)				

BEST MANAGEMENT PRACTICES (BMP) EVALUATION (A.8)

	In SWPPP			Field Implementation			Comments
	Included	Not Included	Not Applicable	Implemented	Not Implemented	Not Adequate	
BMPs							
Existing site-specific BMPs							<i>Field records review not conducted</i>
Existing BMPs to be revised/implemented							
New BMPs to be developed							
Non-Structural BMPs (A.8.a) (include processes, prohibitions, procedures, schedule of activities, etc.; considered low-tech & cost-effective)							
Good housekeeping (A.8.a.i)							
Preventative maintenance (A.8.a.ii)							
Spill response for significant spills or leaks (A.8.a.iii)							
Material handling and storage (A.8.a.iv)							
Employee training (A.8.a.v)							
Waste handling/recycling (A.8.a.vi)							
Recordkeeping & internal reporting (A.8.a.vii)							
Erosion control & site stabilization (A.8.a.viii)							
Frequent Inspections (A.8.a.ix)							
Quality assurance (A.8.a.x)							
Structural BMPs (A.8.b) (consist of structural devices that reduce or prevent pollutants in storm water discharges or authorized NSWD)							
Overhead coverage (A.8.b.i)							
Retention ponds (A.8.b.ii)							
Control devices (A.8.b.iii)							
Secondary containment structures (A.8.b.iv)							
Isolation of activities and materials from rain							
Proper grading to divert runoff from source areas							
Treatment (A.8.b.v)							

RECORDKEEPING AND REPORTING EVALUATION

	Included	Not Included	Not Complete	Comments
Retain on-site copies of Annual Reports for at least five years	<input checked="" type="checkbox"/>			<i>review most recent 2</i>
<i>request</i> Retain on-site copies of employee storm water-related training records				
Retain on-site copies of spill and leak reports				
Retain on-site copies of inspection reports				
Stormwater Sample Analysis + Data				

DATE IN H/S/CM

Full records reviewed and conducted

STORM WATER SAMPLING AND ANALYSIS RESULTS
 (Examine most recent and/or previous year's sampling data)

U.S. EPA Multi-Sector Permit Benchmark Values (Units in milligram per liter (mg/L) unless otherwise noted)	Basic Parameters (required)				Other Parameters (By SIC code as listed in Table D)								
	pH	TSS	SC	O&G	TOC	Al	Cu	Fe	Pb	Zn	BOD	COD	N+N
6-9 s.u.	100	200 μmhos/cm	15	100	0.75	0.064	1.0	0.082	0.117	30	120	0.68	
Location	Date												
Location	Date												
Location	Date												
Location	Date												
Location	Date												
Location	Date												
Location	Date												

pH Hydrogen-Ion Concentration
 TSS Total Suspended Solids
 SC Specific Conductance
 O&G Oil and Grease (can be substituted for TOC)

TOC Total Organic Carbon
 Al Aluminum
 Cu Copper
 Fe Iron
 Pb
 Zn
 BOD
 COD
 N+N Nitrate + Nitrite-Nitrogen

Lead
 Zinc
 Biochemical Oxygen Demand
 Chemical Oxygen Demand

Analytical parameters listed in Table D for commonly inspected SIC code SEE PAGE 41 OF THE GENERAL PERMIT FOR ADDITIONAL SICs
 204X TSS 336X
 207X BOD, COD, TSS, N+N 3441; 3452; 3462, 3471; 3499
 287X Fe, Pb, Zn, N+N, Phosphorous 5015
 331X Al, Zn 5093

Cu, Zn
 Al, Fe, Zn, N+N
 Al, Fe, Pb, TSS (Regions 4 and 9 allow Cu and Zn to be substituted for Al and Fe)
 Al, Cu, Fe, Pb, Zn, COD, TSS

WDID _____ Inspection Date 8/10/10 Inspector Initials SK

(Photo - No #)

(1) - Facility entrance

NOTES

Collect the Following Information

Office Interview:

- Business description, site features and industrial processes that contribute to pollutants to storm water;
- Potential pollutants (i.e. raw materials and final products);

Yard Observations:

- Description of identified SWPPP BMP deficiencies. Reference each deficiency with the applicable SWPPP citation.
- If a SWPPP is not available for review describe yard deficiencies.
- Description of the facility's drainage areas including pollutant sources and discharge locations for those drainage areas.
- Location of storm water sampling locations and note if they are representative of industrial runoff from the facility.

I. Background

- 1999 Cleanup & abatement order for Permanente Cr. Order No. 99-018

• Pond 22 & 13 instream ponds mandate by Water District / source water protection

• Creek Restoration plan

• Retention pond mandate

• 19-22 & 14 → cannot get authorization to clearcut. Submitted in 2007

A. Monitoring

- 22 sites collected by URS.

- How inform? eg Pond #22 not acting as a BMP. Others that can't be cleaned.

- informs about low flows. Not BMP effectiveness studies.

→ can't lose existing ponds & capacity → claim topography mechanism

(AT) markup sampling map.

- hydroseeding, log decks

- roadways

* quarry dewatering covered under IGP?

II. FSR - working up-slope

(2-5) - Pond 22 is turbid → most plan going to 14 rather than ultimate d/c. (10-14)

(6,7) - Pond 14 final BMP d/c & receiving water @ WP #13. Turbidity?

• operators staff & URS doing visual observations. Collecting info given.

(8,9) - Permanente Creek as it flows through Pond 22

(10,16) - Channelized section b/w SL-25 CR & SL-23 CR

(17,18) - Pond 21 completely vegetated & overgrown
note: truck wash, - cement/mud from undercarriage
- cement dust spray.

WDID

Inspection Date 2/10/10

Inspector Initials

SC

(AT) eliminating sample pts due to changing operations/quarry configurations.

II. FSR

- (19-23) - Below wash rack. Goes to receive & thickeners @ WP14
- Scott stated that interior drain inlets plumbed to "pond" for recirculating water system used in process e.g., wash rock, dust suppression
- (24, 25, 33) Pearl Harbor lift station for receive system.
- (1) (F) Truck wash area / sweepers etc. Poor material handling
- (26-31) Open drains & stored in standing water. lime-away decoder.
- (34) - ^{not} thickeners ^{was holding tank} captures commingled. Use for gas condensing towers, etc.
2-5 gal of effluent from drinking WWTP to here? Conflicting info given
- (35) - "The Lake", receive water. Feeds the old thickeners WP#15
- (36) - See six influent lines from "pearl harbor" lift
- ✓ * Operate to use water, drain it & get it ready for winter storage.
- (37, 38) - vintage of rock plant & lab area
- (39) - water trucks
- (40, 43, 44, 45, 46, 47) Heavy equip. pack w/ oil drums stored in standing water. @ WP#16 in quarry area (full) & oil soaked rags in dumpster (41, 42)
- (AI) confirms SW devoting covered under IGP
- (48-52) maintains flow meter record. Int - @.30 NLU. but not continuous turbidity chart. → goes to Pond 4A
- (53-56) - Pond 4A: & outlet. Not discharging. @ WP#17
- (57, 58) Use quarry pit water for dust suppression in quarry. ^{SWPPP Table 6.4 BMPs}
- road: (59-66, 73, 75-81) (69)
- (3) - WP#19. Alley series & road wash. Clean directly to pit. (AI) 308 or drainage standards for road-building
- ✓ (4) - Pond #9. Begin maintaining in 2007 again. Captures flow from muddy roadway above. Outlet situated @ WP#18
- Terminal flow d/c. (82-92)
- ✓ (5) Sed traps @ WP22 (Rock Plant road) in need of maintenance. Flows to Pond #9. (93-96)
- (97-100) - Pond #13. Recently maintained. Intermittent. RB structure pt. that installed in stream
- WDID Inspection Date 2/10/10 Inspector Initials SC
- (67-72) - View of sample pt SH-1 CR. (74)

II. FSR (contd)

(101) - Pond 13B

(104-112) (6) WP# 23 Slope failure. Potential to d/c to upstream pond #13. Gully erosion.

(103) - Pond 13B

(113-114) - mud dewatering

(115-123) (7) Vehicle maintenance area @ WP# 21. Poor material storage in standing water. Pressure wash unit to oil separator.

(124-132) (AI) confirms where water goes & cleanup area maintain skin

(133,134) - up-gradient sediment input to Pond 17

(135,136,138) (8) Pond # 17 @ capacity in need of maint. Mass sediment accumulation.

(137,139-145) - WP# 25 @ pond outlet is sediment-laden d/c. States flows to Dirty Shed basin & pumped to Pearl Harbor.

(146-147) (AI) 308 confirms plumbing on entire plant in terms of water recycling via lift station, the lake & de-comm structures

(148) - Dirty Shed basin or up-gradient of Pond 17 outlet. At Dirty Shed Basin

(149-168) (9) WP# 26. Sediment-laden d/c to Creek from Pond #17. Jett states reluctantly admitted the Pond #17 connects to this outfall. S-21-PD confirmed on map.

(I) - Not a scheduled pond maint or other structural controls. Cannot get clearance for certain ponds. Jett & env ~~has~~ currently have to put in requests to have maint conducted. Need scheduled maint tracking for all structural controls.

note: many ponds appear to be field engineered. No comprehensive plan as to how all retention structures work together.

Photo Log —

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WDID _____ Inspection Date 2/10/10 Inspector Initials SC