

Napier, Michele

From: Rush, Marina
Sent: Wednesday, April 22, 2015 10:56 AM
To: Napier, Michele
Cc: Pianca, Elizabeth; Eastwood, Rob
Subject: FW: Lehigh Permanente Quarry Annual Report 2 cont. EMSA Treatment Facility

Michele – Lehigh correspondence.

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4/23/15
Supplemental Packet
Item # 5

From: JLucas1099@aol.com [mailto:JLucas1099@aol.com]
Sent: Wednesday, April 22, 2015 10:44 AM
To: Eastwood, Rob; Rush, Marina
Subject: Lehigh Permanente Quarry Annual Report 2 cont. EMSA Treatment Facility

Rob Eastwood, Planning Division, County of Santa Clara
County Government Center, 70 West Hedding, San Jose, CA 95110

April 22, 2015

County of Santa Clara Planning Commission - April 23, 2015 - Agenda Item 5 - Lehigh Southwest Cement
- Lehigh Permanente Quarry East Materials Storage Area Runoff and Sediment Treatment

Dear Santa Clara County Planning Commissioners,

In continuance of your November Planning Commission review of Permanente Quarry Annual Report No. 2 at which Commission agreed that Lehigh did exceed water quality standards relative to storm water discharge from EMSA, and that installation of a treatment facility for WMSA/ Quarry pit is feasible as of September 30, 2017, do establish criteria that assures Lehigh's EMSA selenium treatment is in full regulatory compliance.

Certain contaminant management issues that did not find sufficiently evaluated in EMSA documentation are: testing of underlying soils of present and expanded Pond 30 into building pads of former buildings associated with WW II processing of Permanente 'Goop', and in drainage trench dug into same soil to and from Pond 30 as well as soils under present and expanded Pond 30.

A condition for an impervious lining installed in bottom of present and expanded Pond 30 is needed with the appropriate criteria for material that would withstand heavy sediment removal management equipment.

Golder Associates report needed to include tonnage of sediment loads intrinsic to EMSA storm water runoff. Most reliable reference to sediment yields of Permanente Creek watershed is USGS Report 89-4130 Water Resources Investigation, "Effects of Limestone Quarrying and Cement-Plant Operations on Runoff and Sediment Yields in the Upper Permanente Creek Basin, Santa Clara County, California".

If one references this USGS data for 1985-86 it suggests EMSA 102 acre watershed would generate 32 tons of sediment in 1985, 2130 tons in 1986 and 5.6 tons in 1987. As Golder Associates report evaluates monthly average precipitation, with associated incremental and cumulative runoff volumes, the flashy, unpredictable nature of Permanente Creek and high sediment load yield of watershed is not evident or accurately analyzed. This is deficiency that believe directly affects your review of runoff conditions implicit to EMSA management.

As sediments may have to be frequently removed to retain viable integrity in catchment capacity of Pond 30, and as such sediments likely will contain sufficient selenium levels to require regulatory approved disposal, think Planning Commissioners need to know what conditions dictate as to advisability of use of truck or rail, and ultimate disposal site.

Similar uncertainty exists in regards volume of runoff that can be generated in Monte Bello Ridge watershed. One historic high for Permanente Creek was in 1957's annual runoff of 12,899 acre feet which translates into 261 acre feet for this site, four times greater than cumulative runoff anticipated in Golder Associates study. (In comparison it might be noted that Permanente had only three days of flow over 1 cfs in 1984 and 1985.)

Unsure as to viability of pumping storm water runoff from Pond 30, uphill, directly to Pond 4 treatment facility but think this should be evaluated in this report. Unpredictable levels of storm water runoff reaching Pond 30, added to which are feasible flows from emergency spillway pipe in high storm events, makes overflow from Pond 30 likely to generate pulse flows that result in serious erosion or flooding conditions downstream. Can buffer vegetated terraces or step pools be incorporated between Pond 30 and Permanente Creek outfall?

Believe have mentioned in past comments and submitted documentation, the degree to which find extensive miles of downstream Permanente Creek's unconfined zone susceptible to percolating contaminants from present and former quarry operations directly into our drinking water aquifers. Also underflow from EMSA site flows downhill to deep aquifers, even accelerated by earthquake faulting and geologic groundwater cascade.

Continue to advise monitoring wells be installed at downhill perimeter of EMSA portion of quarry operations to evaluate levels of chemical constituents of contaminants migrating from this site in watershed groundwater not just to Permanente Creek but to identify what continues to Heney Creek and Cal Water wells beyond.

Water treatment alternatives for EMSA are not only feasible but they are imperative. Thank you for your kind consideration of these concerns.

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