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895 AEROVISTA PLACE, STE. 101
SAN LUIS OBISPO, CA 93401

May 23, 2005

State Water Resources Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California



Dear Matt:

We submit the following comments regarding proposed waste discharge requirements for Graniterock's Southside Sand and Gravel facility. In the main, Graniterock finds this proposed Order to be workable. The few comments we have are addressed below, in the order in which they appear in the draft documents:

Item 3:

"The Facility is located in Section 18 of Township 13S, Range 6E of the Mount Diablo Base & Meridian and consists of assessor's parcel numbers 025200-031, 025410-001, 025410-002 and 025200-009. The latitude and longitude coordinates of the Facility are 36°47' 21.5" and 121°20' 32.1", respectively."

Upon review, we find that APN 025200-009 is nonexistent. We did not submit this parcel number in our original application packet and, as it is not a valid parcel number, request that it be removed from the facility description.

Item 23:

"...Groundwater flow beneath the Facility is generally in a north to northwesterly direction ..."

The November 9, 1996 Weber, Hayes Report shows groundwater to be flowing to the West, in the downstream flow direction of Tres Pinos Creek. We are not in possession of any data to the contrary; if the Board has information stating groundwater flow to be in a North to Northwesterly direction, Graniterock requests to be allowed to review this data.

- Monterey County
- San Benito County
- San Mateo County
- Santa Clara County
- Santa Cruz County
- Alameda County
- City and County of San Francisco

Material Supplier/ Engineering Contractor
License #22

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www.graniterock.com

Item No. 30 Attachment 3
July 7-8, 2005 Meeting
Granite Rock Company, Inc.
San Benito County



Item 28:

"Based on available construction details and a well location map, the well designated as MW-3 in this report is believed to be the water supply well currently identified as Br 154 by the Discharger."

The well designated "Br 154" or "154 production well" is the water supply well located downstream of the existing ponds. MW-3 is located as in Figure 2 of the November 9, 1996 Weber Hayes report, up gradient of the settling ponds. The designation for the production well will be "Br 154 Production Well", to maintain consistent notation and avoid confusion in the future.

Item 38:

"The 1,300 mg/L of aluminum detected in the wastewater is likely due the presence of both colloidal and dissolved aluminum as a result of clay minerals being washed from the processed aggregates. Clay minerals (hydrrous aluminosilicates) contain high concentrations of aluminum and soils typically contain 10,000 to 300,000 mg/kg (Dragun, 1998) ..."

Graniterock requests that limits for metals in this WDO be given in dissolved form, and that subsequent sampling be conducted for dissolved metals per current State and Federal water quality regulations. This will more accurately assess the amount of metals of concern to our water quality objectives.

Discharge Prohibitions, Item 11:

"The use of heavy equipment within the Tres Pinos Creek channel is prohibited except as allowable by the Executive Officer and other applicable agencies for emergency purposes."

Graniterock would like to clarify that construction and maintenance of levees is not considered to be within the Tres Pinos Creek channel under this WDO. Equipment will not enter the creek but will be present at the level of the levee bottoms as presented in our original application, in order to construct new levees and to perform necessary maintenance on existing levees.

Graniterock finds the conditions of the draft Monitoring and Reporting Requirements to be feasible, and has no comments regarding this document.

We thank the board for their assistance in preparation of this order and look forward to working with board in these matters. If you have any questions or require additional



information, please do not hesitate to contact me at (831) 768-2094 or by e-mail at ajohnstonkaras@graniterock.com.

Sincerely,

Aaron Johnston-Karas

A handwritten signature in black ink that reads "Aaron Johnston-Karas".

Environmental Manager
GRANITE ROCK COMPANY