



R02603

3/24/2006

Jerry Wickham  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway, Suite 250  
Alameda, Ca. 94502-6577

Alameda County  
MAR 28 2006  
Environmental Health

**Re: Work Plan – Fuel Leak Case # RO0002603  
RMC Pacific Materials d.b.a. CEMEX - Eliot Aggregate Plant  
1544 Stanley Blvd., Pleasanton, CA. 94566**

Mr. Wickham:

In response to your most recent letter dated February 24, 2006, CEMEX requests a delay for the requirement to submit a work plan to delineate the vertical and horizontal extent of petroleum product contamination beneath the gasoline dispenser at the above-referenced CEMEX facility. Our request for a delay centers on following reasons:

1. We are currently working with Mr. Robert Weston (also with Alameda County Environmental Health) to remove the gasoline and diesel UST fuel systems at the site. The removals are expected to take place near the end of April 2006.
  - o Removal of the USTs and the dispensers may eliminate the contaminated soil issues that were encountered during the December 2003 upgrades. On the other hand, the removals could introduce new factors that were not apparent when the dispensers were upgraded. Clearly, more data will aid in ACEH's and CEMEX's decisions.
2. The requirement to obtain a groundwater sample from beneath the gasoline dispenser prior to our proposed tank removals may not be cost-effective for CEMEX. This opinion is based on experience we have had at other CEMEX sites with analogous geologic conditions.
  - o The aggregate plant is located on top of a nearly 400-foot thick Holocene-age valley-fill materials composed of unconsolidated gravels, cobble, sand, silt and clays.
  - o The local groundwater table is somewhere between sixty-five and one hundred feet below surface grade at the site (This information is based on the levels of the EBRPD Shadow Cliffs reservoir bordering the west side of the property and depth-to water readings in the plant's production well).
  - o Drilling to collect groundwater samples from the above-described type of geologic unit is best done through the use of percussion (Becker Hammer) drilling equipment. CEMEX has contacted and obtained an estimate from a drilling contractor with this type of equipment. The cost (including the installation of a monitor well) is nearly equal to that of a tank removal.

- o CEMEX is not opposed to installation of groundwater monitoring wells at the site. We only request that the requirement be based on the results of the tank removals.

CEMEX, therefore, requests to postpone proceeding with the work plan until the tank removal project has been completed.

Please do not hesitate to contact me at (925) 426-2261 or by fax at (925) 426-2231 if you have any questions or concerns.

**Certification Statement**

*I declare under penalty of perjury, that the information and/or recommendations contained in the attached work plan proposal is true and correct. All data that is contained in the attached proposal, was obtained in compliance with the California Health and Safety Code, California Code of Regulations, Business and Professions Code, California Water Code, and the Alameda County Code.*



Robert Aldenhuysen  
Environmental Manager  
Enc.

cc: J. Blanton  
R. Green  
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