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CEMEX

5180 Golden Foothill Parkway, Suite 200, El Dorado Hills, CA. 95762-9608

2007 JUL 25 [illegible]

7/24/2007

Alameda County

JUL 25 2007

Environmental Health

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

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

Mr. Wickham:

Please find enclosed the work plan for soil and water sampling at the above-referenced CEMEX aggregate plant. We request that we be allowed to postpone the project until early 2008 due to the expense of the project (anticipated to be ~$50,000 based on previous estimates). The expense was not anticipated or included in this year's budget so additional funds must be requested from our corporate office in Houston for next year.

CEMEX is committed to meet the requirements of the Alameda County Environmental Health Department and therefore we hope that your agency will grant our postponement request.

Certification Statement

I declare under penalty of perjury, that the information and/or recommendations contained in the attached report is true and correct. All data that is contained in the attached report, 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.

Please contact me if you have any questions.

Sincerely

Robert Aldenhuysen
Environmental Manager

SOIL AND GROUNDWATER INVESTIGATION
SAMPLING PLAN
CEMEX CONSTRUCTION MATERIALS, L.P.
ELIOT AGGREGATE PLANT
1544 STANLEY BOULEVARD
PLEASANTON, CALIFORNIA
Alameda County Fuel Leak Case
#RO0002603

Prepared by:

Robert Aldenhuysen
Environmental Manager

Reviewed by:

Louis B. Schipper III
Director Environmental – West Region
Professional Geologist #5936

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SOIL AND GROUNDWATER INVESTIGATION
SAMPLING PLAN
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BACKGROUND

CEMEX Construction Materials, L.P. (CEMEX) currently owns and operates an aggregate mining and processing plant located at 1544 Stanley Boulevard in Pleasanton, California (Figure 1). The site was previously owned and operated by RMC Pacific Materials, Inc. until CEMEX purchased the company in June 2005. On November 20, 2003, during the installation of under-dispenser containment (UDC) at the gasoline dispenser, analysis of soil samples taken three feet below the dispenser disclosed a presence of methyl tert-butyl ether (MTBE) at 71 milligrams per kilogram (EPA method 8260B). On October 7, 2005, and again on February 24, 2006, the Alameda County Environmental Health Department (EHD) requested the submittal of a work plan to "assess the lateral and vertical extent of soil and groundwater contamination beneath the site." CEMEX's response was to submit a request to postpone delineation of the soil and water contamination until the site's two underground fuel storage tanks (USTs) were removed.

On January 11, 2007, at the direction of the Alameda County Environmental Health Department (EHD), a State licensed contractor hired by CEMEX permanently removed the two 10,000-gallon USTs (gasoline and diesel) from the site. On April 18, 2007, CEMEX submitted a report titled "Fuel Tank Removals – Fuel Leak Case #RO0002603, RMC Pacific Materials d.b.a. CEMEX – Eliot Aggregate Plant, 1544 Stanley Blvd., Pleasanton, CA 94566" in which the results of laboratory analyses of the soil samples taken from the two tank and dispenser excavations revealed that all samples were non-detect for BTEX, MtBE, EtBE, TBA, TAME, DIPE, 1,2-DCA, and EDB to a depth of thirteen feet (Severn Trent Laboratories, Inc., a state certified laboratory). CEMEX also requested closure based on the analyses. EHD responded with a letter dated May 8, 2007 stating that additional work would be required before closure would be considered.

INTENT OF PROPOSED PLAN

CEMEX is submitting this work plan to confirm that the extent of soil contamination at the site was localized, is minimal, has not made contact with the local

water table located approximately 100 feet below surface grade (BSG), and has not adversely affected local groundwater.

PROPOSED SCOPE OF WORK

DRILLING PROJECT

CEMEX proposes to hire a State-licensed drilling contractor to drill and sample a minimum of six soil borings at the plant; three borings at the former gasoline and three at the former diesel UST sites to help determine the groundwater flow direction. The contractor will progress these borings by utilizing a reverse-circulation air-percussion drilling rig, equipment that has been found to be best suited for the gravel and cobble-rich soil found in this area of the Alameda County Tri-Valley. The approximate locations for the borings are shown in Figure 2. All borings will be advanced to fifteen feet below the surface of the local groundwater table, anticipated to be somewhere between 65 and 125 feet BSG based on the elevations of nearby Shadow Cliffs Regional Park reservoir and depth-to-water measurements in the plant's supply well. All borings will be converted into groundwater monitoring wells for the site.

Project Management

Mr. Louis Schipper, CEMEX Director Environmental - West Region, a California Professional Geologist, will be responsible for technical and administrative evaluation and peer review of the project. Mr. Robert Aldenhuysen, CEMEX Environmental Manager, will be the primary contact responsible for the supervision of the field activities in coordination with the drilling contractor.

Soil Sampling

Cutting returns will be collected and sampled with an organic vapor analyzer (OVA) [Foxboro Model 88] on a regular basis. The OVA probe will be pushed into the cuttings and left for approximately thirty seconds to determine if discernable hydrocarbon vapors can be detected in the pore space of the soil material. Cutting returns will be collected directly from the sample cyclone on the drill rig into a large rubber tub. The contents of the tub will be changed out every five feet and checked for soil type, odor and OVA response. Soil samples for chemical analysis will be taken directly from the soil cuttings in the rubber tub. If a petroleum vapor is encountered a soil sample will be taken every five feet until either the vapor is no longer detected or first water is reached in the three proposed monitoring wells. If no odors are encountered in the cuttings a sample will be taken every twenty feet. All soil samples will be collected into a laboratory-cleaned glass-sampling jar, labeled, and placed into a chilled ice chest for analysis at a State-

certified laboratory. Strict chain-of-custody protocol will be followed during all phases of sample handling.

Upon reaching the water table drilling will be temporarily halted for at least thirty minutes to recover pressure equilibrium. After that recovery period measurements will be taken with an electronic water tape to determine the depth to the water level. A clean bailer will then be lowered down through the center drill tubing, to observe and measure any presence of floating petroleum product thickness. A sample of the groundwater will also be taken at that time for chemical analysis.

Well Construction

The three new monitoring wells will be constructed of four-inch interior diameter, schedule 40, PVC blank casing with twenty feet of 0.02 slotted screen at its bottom (Figure 4). Typically, fifteen feet of perforated casing will extend below the water table surface and the remaining five feet will extend above it. The annular space between the perforated casing and the excavation wall will be sand-packed with Lapis Luster #1c sand to a level two feet above the screened interval. A one-foot spacer of bentonite pellets or crushed natural bentonite granules will be placed directly above the sand pack. All depths of sand pack and bentonite seal will be verified by sounding with a weighted tape. The remaining annular space will be filled up to the surface with a neat cement/bentonite grout.

Surface completions of the wells will depend on the protective needs for each well. In areas of low probability of damage the top of each well will be just below grade and the casing will be capped with a flush mounted "Christy™ type" box. In areas of higher damage probability, the well will be completed above grade with a three-foot steel standpipe and a locked cap. Upon completion and development of the new groundwater monitoring well installations a dedicated bladder pump (QED Model P1101M) will be installed into each well. Construction details of each well will be recorded and presented in a final report.

Well Development

All wells will be fully developed to the extent practical in order to improve hydraulic continuity with the native matrix. Development will be performed using pumping, bailing or surging of the well to a sediment-free state. All water volumes will be recorded along with periodic pH and conductivity measurements. Development will cease when the well produces little or no fine sediment and the water parameters have stabilized.

Surveying of Wells

Within one month of completing the well installations a State-licensed surveyor will survey the new wells relative to Table 1 (vertical datum) and NAD83 per Table III (horizontal datum).

Groundwater Sample Collection

One full set of groundwater samples will be collected at the conclusion of all drilling and well-development work.

Each well will be purged of no less than three casing volumes of water in order to ensure sampling the formation groundwater. Purging will be carried out using the dedicated bladder pump. All purged water volumes will be recorded on the sample collection log sheet along with periodic pH, temperature and conductivity measurements. Groundwater samples will be collected directly into laboratory-supplied containers directly from the pump discharge tube. Sample volumes will consist of two one-liter amber glass containers and a pair of 40-ml VOA vials. Each sample container will be filled completely, capped and then checked for trapped air by inversion and tapping. If an air bubble is observed in a vial, that vial will be reopened and topped off with additional well water until no bubbles exist when the container is inverted. All samples will be properly labeled and then placed into a chilled cooler for transportation to a State-certified laboratory for analysis. Strict chain-of-custody protocol will be followed during all phases of sample handling.

Laboratory Analyses & Reporting

All soil and water samples taken from the project site will be submitted to a state certified laboratory for analyses for total petroleum hydrocarbons as gasoline (TPH-gasoline; EPA method 8015M) and benzene, toluene, ethyl benzene and xylenes (BTEX; EPA method 8021B). Upon receiving the analytical results from the soil samples and the first set of groundwater samples a comprehensive report (electronic format) about the project will be generated and submitted to EHD. This report will present a narrative summary of all well construction details, boring logs, development records, analytical results and chain-of-custody sheets and copies of all field sheets. The report will be submitted to EHD within 30-days of project completion and all laboratory analytical data and results will also be submitted electronically to the GeoTracker database.

Waste Management

All purged groundwater will be temporarily stored on-site in properly labeled, 55-gallon drums pending the outcome of the laboratory analyses. If the laboratory results indicate that contamination exists, then the materials will be picked up and manifested

with the plant's routine hazardous waste collection. If contamination is not found then the purged water will be disposed of to ground surface at the end of each sampling event.

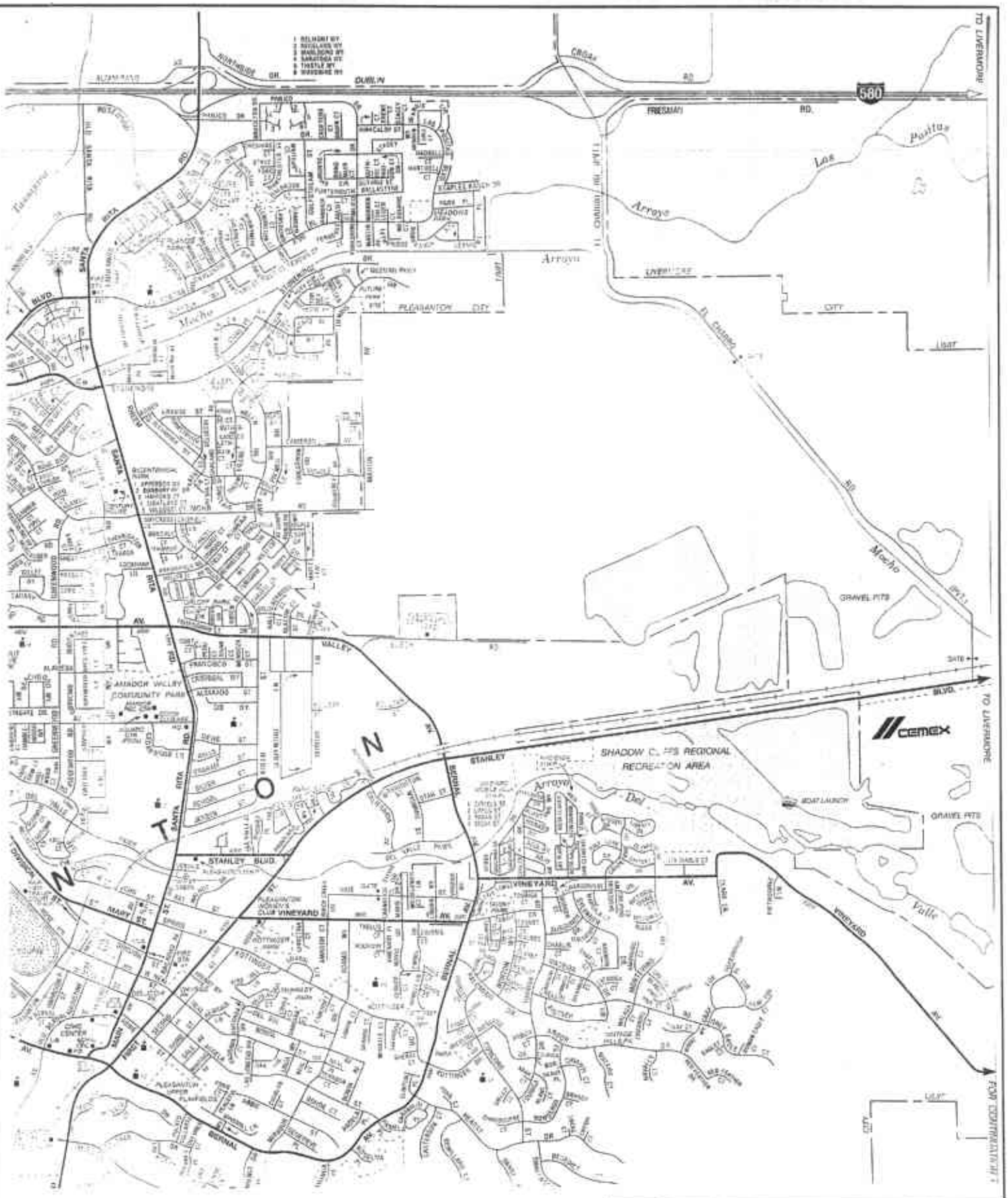

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FIGURE 1 - Plant Vicinity Map			
7/16/2007	Eliot Drill Project 1	R.A.	Rev.1

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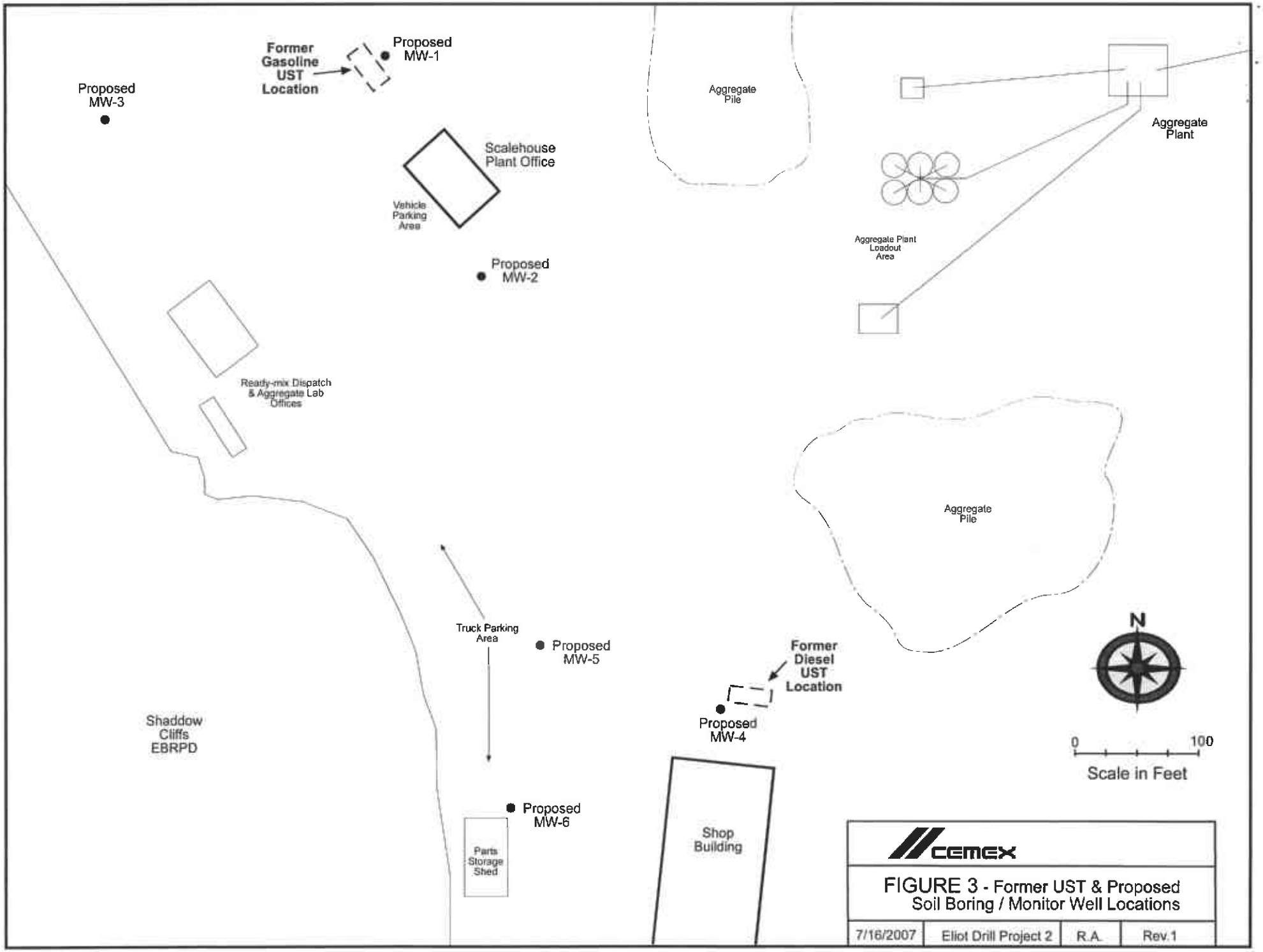
FIGURE 2 - Facility Diagram

7/16/2007	Eliot Drill Project 1	R.A.	Rev.1


Former Gasoline UST Location
Proposed MW-1
Proposed MW-3
Scalehouse Plant Office
Vehicle Parking Area
Aggregate Pile
Aggregate Plant
Aggregate Plant Loadout Area
Proposed MW-2
Ready-mix Dispatch & Aggregate Lab Offices
Aggregate Pile
Truck Parking Area
Proposed MW-5
Former Diesel UST Location
Proposed MW-4
Shaddow Cliffs EBRPD
Proposed MW-6
Parts Storage Shed
Shop Building
N
0
100
Scale in Feet
CEMEX
FIGURE 3 - Former UST & Proposed Soil Boring / Monitor Well Locations
7/16/2007
Eliot Drill Project 2
R.A.
Rev.1

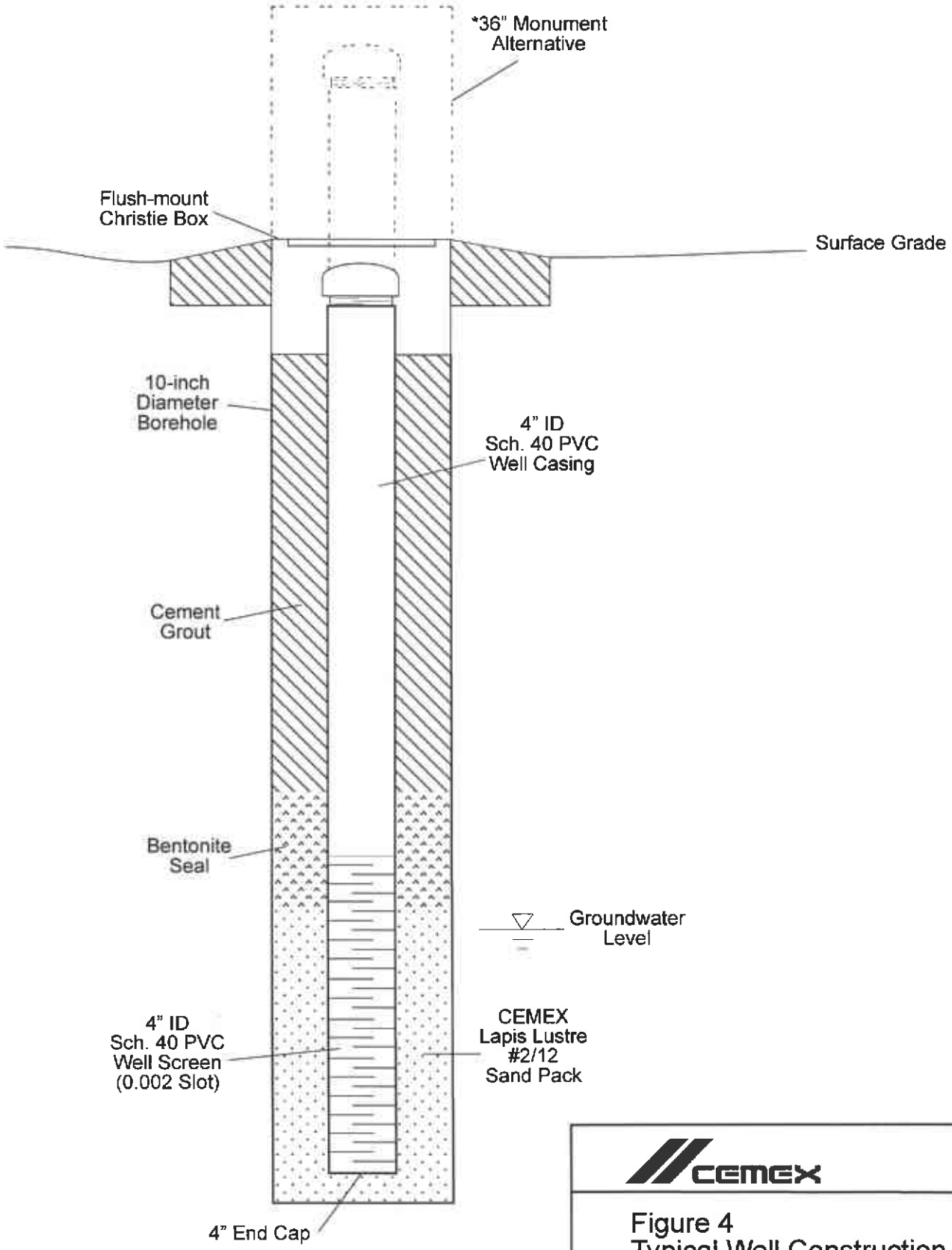


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Figure 4
Typical Well Construction