

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 18, 2008

Mr. Lee Cover
Hanson Aggregates West Region
Hanson Permanente Cement, Inc.
3000 Busch Road
Pleasanton, CA 94566-8403

Subject: SLIC Case RO0002941 and Geotracker Global ID SLT19719376, Hanson Aggregates Radium Plant, 3000 Busch Road, Pleasanton, CA 94566

Dear Mr. Cover:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "Work Plan for the Excavation of Petroleum-Affected Soil at the Former Hot Mix Asphalt Plant Area (AOC #1) of the Hanson Aggregates Radium Facility, 300 Busch Road, Pleasanton, California," dated March 21, 2008 and prepared by LFR Environmental Management & Consulting Engineering. The Work Plan proposes excavation and confirmation soil sampling to remove TPH contaminated soil from the Former Hot Mix Asphalt Plant Area (AOC #1).

The proposed scope of work is acceptable and may be implemented provided that the technical comments below are addressed and incorporated during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- Proposed Cleanup Levels.** The proposed cleanup level of 83 milligrams per kilogram (mg/kg) for TPH as diesel is acceptable and would allow unrestricted future land use. The Work Plan proposes a cleanup level of 2,500 mg/kg for TPH as motor oil based on an Environmental Screening Level (San Francisco Bay Regional Water Quality Control Board, November 2007) for commercial land use. Based on our review of the existing shallow soil data, excavation and removal of shallow soil to achieve the proposed cleanup level for TPH as diesel is likely to also remove shallow soil with TPH as motor oil that exceeds the ESL for residential land use in the proposed excavations. Given the limited additional excavation, if any, required to meet a cleanup level for unrestricted future land use, we request that you use a cleanup level of 410 mg/kg for TPH as motor oil.
- Inspection and Screening of Soils beneath Remaining Surface Structures.** Following removal of the remaining surface structures, we concur with the proposal to inspect and

screen soil beneath the structures for indications of petroleum contamination. If staining, odor, or elevated PID readings are observed in soil beneath the former structures, visibly stained and odorous soil should be excavated prior to collection of confirmation soil samples. Please provide a minimum of 48 hours advance notification of confirmation soil sampling (e-mail preferred to jerry.wickham@acgov.org) in order for ACEH to observe conditions beneath the surface structures and direct any additional confirmation soil sampling required. Please present the results in the AOC #1 Excavation Report requested below.

3. **Confirmation Soil Sampling.** The proposed confirmation soil sampling is generally acceptable. Sidewall confirmation samples are to be collected from the depth interval where the highest PID readings, odor, or visual contamination was observed during excavation. ACEH may direct additional confirmation soil sampling based upon observations in the field during or following excavation. The excavation is to be extended to remove visibly stained and odorous soil prior to confirmation soil sampling. The excavation is to be extended in areas where confirmation soil samples exceed the Environmental Screening Levels (San Francisco Bay Regional Water Quality Control Board, November 2007) for TPH as diesel of 83 milligrams per kilogram (mg/kg) and TPH as motor oil of 410 mg/kg. For any excavation sidewalls where these parameters cannot be achieved due to the presence of surface structures or utilities, ACEH is to be notified and additional confirmation sampling will be required to document the extent of contamination left in place beneath the utility or structure. Please provide a minimum of 48 hours advance notification of confirmation soil sampling (e-mail preferred to jerry.wickham@acgov.org) in order for ACEH to observe conditions in the sidewall and direct any additional confirmation soil sampling required. Please present the results in the AOC #1 Excavation Report requested below.
4. **Boring AP4 and B4 Area.** Elevated concentrations of TPH as diesel were detected in soil samples collected from depths of 9-10 and 10.5 feet bgs in borings AP4 and B4, respectively. However, no soil samples were collected at shallower depths in these borings to assess whether the shallower soil is contaminated. Therefore, we request that you inspect and screen soil to a depth of approximately 8 feet bgs at these locations to collect confirmation soil samples. Please present the results of the screening and confirmation sampling in the AOC #1 Excavation Report requested below. If visibly stained and odorous is observed or the concentrations of TPH as diesel or motor oil exceed the proposed clean-up level, excavation and removal is to be conducted in this area.
5. **Soil Pile and Boring B-3.** As shown on site figures, boring B-3 appears to have been advanced through a soil pile immediately south of the former hot mix asphalt plant. A soil sample collected at a depth of 10 feet in boring B-3 contained 7,300 mg/kg of TPH as diesel. If the soil pile contains contaminated soil, the soil is to be excavated and removed. The proposed depth limit for excavation should be applied from ground surface and not from the surface of soil piles or mounds.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **August 29, 2008** – Former Hot Mix Asphalt Plant (AOC #1) Excavation Report
- **40 days after end of each quarter** – Groundwater Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to

Mr. Lee Cover
RO0002941
April 18, 2008
Page 4

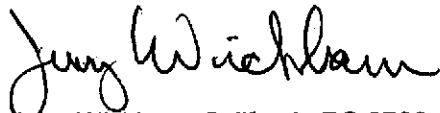
present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street
Pleasanton, CA 94566

Steven Dunn, Legacy Partners, 4000 East Third Avenue, Suite 600
Foster City, CA 94404-4805

Katrin Schliewen, LFR, 1900 Powell Street, 12th Floor
Emeryville, CA 94608-1827

Voytek Bajsarowicz, ENV America, 244 California Street, Suite 500
San Francisco, CA 94111

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)