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Alameda County Environmental Health

May 28, 2010

Mr. John Rigter Pleasanton–Livermore Fire Department 3560 Nevada Street Pleasanton, California 94566

Mr. Jerry Wickham Alameda County Health Care Services Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Subject: Closure Plan for Area of Concern #2 and 3, Former Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California (ACEH Case RO0002952 and Geotracker Global ID SL0600101555)

Dear Mr. Rigter and Wickham:

The attached Closure Plan was prepared by ARCADIS-US on behalf of Lehigh Hanson West Region (formerly Hanson Aggregates West Region), and Legacy Partners for Area Of Concern #2 and #3 (AOC#2 and AOC#3) of the former Hanson Aggregates Radum Facility located at 3000 Busch Road, Pleasanton, California. As provided in the attached closure plan, no additional field work or closure activities are required for AOC#2. At AOC#3, the subsurface piping, grease trap, and double weir located near the former Lube Shop will be removed as described in the attached closure plan.

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions or comments concerning this Closure Plan, please call me at (925) 244-6584 or Ron Goloubow of LFR at (510) 652-4500.

Sincerely,

Lee W. c

Lee W. Cover Environmental Manager Lehigh Hanson West Region

Attachment





Mr. John Rigter Pleasanton – Livermore Fire Department 3560 Nevada Street Pleasanton, California 94566

Mr. Jerry Wickham Alameda County Health Care Services Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Subject:

Closure Plan for the Area of Concern #2 and Area of Concern #3 at the Former Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California (ACEH Case #RO0002941 and Geotracker Global ID #SLT19719376)

Dear Mr. Rigter and Wickham:

ARCADIS has prepared this closure plan at the request of the Livermore-Pleasanton Fire Department (LPFD), and Alameda County Health Care Services Environmental Health Services (ACEH) on behalf of Lehigh Hanson West Region ("Hanson") and Legacy Partners ("Legacy"), for Area of Concern #2 (AOC #2) and Area of Concern #3 (AOC #3) at the former Hanson Aggregates Radum Facility located at 3000 Busch Road, Pleasanton, California ("the Site"; Figures 1 and 2).

The LPFD's September 25, 2009 letter, to which the ACEH's April 6, 2010 letter refers, provided the following comments and requirements for AOCs #2 and #3, all of which are addressed in this closure plan in the sections referenced next to the comment.

- 1. Closure of the wash rack sump and related piping has not been adequately addressed. The wash rack system needs to be removed. The closure plan needs to be amended to include the following:
 - Provide wash rack configuration; chamber(s) and location of drainage piping (to outfall) on the site map. [see Section 2.1.2 below and Figures 4A, 4B, and 5]
 - b. Submit a cleaning, removal, waste sampling, and disposal plan. Currently sump contains liquid and sludge. Wash rack sump chamber(s)

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ENVIRONMENT

Date: May 28, 2010

Contact: Ron Goloubow

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Our ref: EM009567.0007

and associated drainage piping need to be clean and empty prior to demolition and removal. [See Section 2.3 below]

- c. Submit a soil sampling and analytical plan for the area adjacent to the sump chamber(s) and associated piping. [See Section 2.4 below]
- Closure of the underground lubricant piping between the shed and warehouse/shop building has not been adequately addressed. The piping needs to be removed. The closure plan needs to be amended to include the following:
 - a. Provide system details; piping material, size and last known contents, and locate on the site map. [See Section 2.3 below and Figure 5]
 - b. Submit a cleaning, removal and disposal plan describing the methods that will be used. [See Section 2.3 below]
 - c. Submit a soil sampling and analytical plan for the area adjacent to the piping. [See Section 2.6 below]
- 3. To date, very little hazardous materials storage and use information has been provided for the area east of AOC #3. This area contained main electrical switching and transformer equipment, part of the overhead conveyer system, and various buildings and structures, including the large electrical transformer units containing regulated levels of PCBs. Reference was made to an inspection report and the comment was that the concerns raised therein needed to be addressed. Specifically the Fire Department requested additional information for this area including building locations, uses, hazardous materials storage and use (including quantities), and closure activities conducted to date and the provision of sampling results (soil, material, waste, etc.) and disposal information. [See Section 2.1.1 below]
- 4. In the final Closure Report, provide disposal documentation for all hazardous materials and wastes handled during this facility closure. Please ensure the documentation copies can be read and the signed TSDF copies of the manifests are included. [This material was provided in the January 2010 revised closure plan presented to the LPFD.]

1. Closure Plan for AOC #2

This closure plan addresses the following features of AOC #2:

- The idle truck maintenance shop
- The former underground storage tanks (USTs)
- The former idle truck maintenance area

These site features are illustrated on Figure 3. The ACEH requested a formal closure plan for this area in their letter to Hanson dated, April 6, 2010. Please note that this closure plan documents the closure activities previously conducted at AOC #2 and no additional fieldwork or closure activities are required for AOC #2.

1.1 Background

LFR Inc. (LFR; now ARCADIS) prepared closure plans for the Site dated June 19, 2009 and January 29, 2010. The June 2009 Closure Plan included a summary of cleanup and closure-related activities completed by Hanson during 2008 in the idle truck maintenance shop and former idle truck maintenance area that are part of AOC #2. The closure-related activities completed by Hanson during 2008 were conducted as part of the property transfer from Hanson to Legacy. The information and documentation regarding closure activities conducted in AOC #2 were included in the June 2009 Closure Plan in order to transmit the relevant documentation to the LPFD. The features of AOC #2 listed above were not included in January 2010 revised closure plan and are the subject of this closure plan.

Environmental work previously conducted at the Site under the oversight of ACEH has been described in more details in various work plans and reports, a list of which is provided as Attachment 2 to this closure plan. A selection of these reports has previously been provided to the LPFD for their review and reference.

1.1.1 The Idle Truck Maintenance Shop

The former idle truck maintenance area is located in the west-central portion of the Site (AOC #2; Figure 3). The eastern portion of AOC #2 contains several structures, including the idle truck maintenance shop currently used by the Pleasanton Garbage Service Inc. Seven former USTs have been removed from this AOC; these have been investigated and closed to the satisfaction of regulatory oversight agencies as



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further described below. An inactive 640-foot-deep water supply well owned by Zone 7, well 3E/1S 15F3, also known as well Kaiser #6, is located southwest of the idle truck maintenance shop and was sampled by ENV in February 2007 (sample name W-1; Figure 3).

1.1.2 The Former Underground Storage Tanks

As summarized in the report entitled: "Site Investigation Report for the Eastern Portion of AOC #2 and AOCs #3 through #9 ACEH Case #RO0002952 and Geotracker Global ID #SL0600101555 Hanson Aggregates Radum Facility 3000 Busch Road Pleasanton, Alameda County, California" dated October 26, 2007, a total of seven USTs were removed from AOC #2 between 1990 and 2003.

Three USTs (two 12,000-gallon diesel and one 10,000-gallon gasoline) were removed from the east side of the truck maintenance shop in November 1990. Total petroleum hydrocarbons as diesel (TPHd) was detected in confirmation soil samples from the former UST excavation at concentrations up to 1,600 mg/kg; further excavation was deemed impractical due to the presence of the aboveground water tank and building (Figure 3). Analytical results for groundwater samples collected annually from well MW-KP1 installed adjacent to the former UST excavation were below laboratory reporting limits for TPHd during 1994 through 1996. Well MW-KP1 was properly abandoned in 1998. This former UST area received regulatory closure in 1998. ENV subsequently collected six soil samples from between 5.5 and 29 feet bgs and one grab groundwater sample from 29 feet bgs from soil boring EB-2. TPHd, total petroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as motor oil (TPHmo), benzene, toluene, ethylbenzene, and total xylenes (BTEX), and polychlorinated biphenyls (PCBs) were below analytical reporting limits in the soil samples; the groundwater sample contained TPHd at 79 mg/l, below the Regional Water Quality Control Board (RWQCB) environmenal screening level (ESL) for TPHd.

Two USTs (one 1,000-gallon waste oil and one 1,000-gallon new oil) were removed from the west side of the truck maintenance shop in February 1995 (Figure 3). Two USTs (one 12,000-gallon diesel and one 10,000 gallon gasoline) were removed from an area north of the truck maintenance shop in June or July 2003 (Figure 3). A total of four soil samples (two from beneath each UST) were collected from the base of the excavation for the former USTs, at approximately 11 feet bgs. ENV subsequently collected one soil sample from former soil boring EB-6 (20 feet bgs) and three soil samples from both EB-7 and EB-8 (2, 6, and 15 feet bgs). TPHd, TPHmo, and BTEX

were not detected above analytical reporting limits. This former UST area received regulatory closure in 1998.

As previously reported, results from investigations conducted by LFR (currently ARCADIS) during July 2007, evaluated in conjunction with results from previous investigations, indicate that AOC #2 has been sufficiently characterized. ARCADIS does not recommend any additional investigations be conducted in this area. Confirmation soil samples collected from the base of the former UST excavation contained low concentrations of TPHd (between 10 and 210 mg/kg). Subsequent investigations by ENV and by Brown and Caldwell Engineers (B&C) included the collection of soil and grab groundwater from up to five temporary soil borings and showed that TPHd, TPHg, TPHmo, BTEX, and PCBs were not detected above analytical reporting limits and/or the ESLs.

1.1.3 The Former Idle Truck Maintenance Area

This area of AOC #2 was primarily used to store "heavy equipment" including loaders and overhead cranes. Details regarding the volume of materials removed from this portion of the Site were not recorded and are not available. As part of the closure activities for this part of the Site, this equipment was either sold or relocated. The area is currently vacant.

Based on previous investigations, a Potential Environmental Condition (PEC) was identified near the northeastern corner of the maintenance yard during the Phase II ESA by ENV, based on the analytical results from soil samples collected from temporary soil boring EB-31. Soil boring EB-31 was advanced by ENV reportedly because a former "waste pit" or disposal pond existed in this portion of the Site (ENV 2006b). Analytical results identified that the soil sample collected from approximately 10 feet bgs slightly exceeded the ESL for TPHd. Other soil samples collected from above and below the 10-foot interval did not exceed the ESLs.

2. Closure Plan for AOC #3

This closure plan addresses the following features of AOC #3:

- The area located east of the office building and parking lot
- The former wash rack system
- The former lube shed

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These site features are illustrated on Figures 4A, 4B, and 5. The LPFD requested a formal closure plan for these areas located in AOC #3 in their letter to Hanson dated September 25, 2009.

2.1 Background

LFR (now ARCADIS) prepared closure plans for the Site dated June 19, 2009 and January 29, 2010. The June 2009 Closure Plan included a summary of cleanup and closure-related activities completed by Hanson during 2008 in the heavy equipment maintenance and wash rack area that are part of AOC #3. These closure-related activities were conducted as part of the property transfer from Hanson to Legacy. The information and documentation regarding closure activities conducted in AOC #3 were included in the June 2009 Closure Plan in order to transmit the relevant documentation to the LPFD. The three features of AOC #3 listed above (the former wash rack system, the former lube shed, and the area located east of the office building and parking lot) were not included in January 2010 closure plan and are the subject of this closure plan.

Environmental work previously conducted at the Site under the oversight of ACEH has been described in more detail in various work plans and reports, a list of which is provided as Attachment 2 of this closure plan. A selection of these reports has previously been provided to the LPFD for their review and reference.

2.1.1 The Area Located East of the Office Building and Parking Lot

One area of interest for the LPFD has been the area located east of the office building and parking lot. This area is illustrated on Figures 4A and 4B. Each figure illustrates the Site as it was configured while the aggregate plant was operating and illustrates the analytical results of the soil samples collected in this portion of the Site. Figure 4B depicts the Site using the aerial photograph from the 2005 Baseline Environmental Consulting ("Baseline") Closure Plan provided to the LPFD. Figure 2 from Baseline's 2005 closure plan identifies the location, uses, materials storage, and closure status of those buildings.

As indicated on Figures 4A and 4B, three soil samples were collected from this area during investigations conducted by ENV in 2006. The sample locations were targeted based on previous site usage. One soil sample identified as DR was collected near a former drum storage area; the soil sample identified as WH was collected near a former warehouse building; and the other sample identified as PL was near the

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former plant lube storage area. As indicated each of these samples did not contain chemicals of concern at concentrations above the laboratory reporting limits (see Figures 4A and 4B).

Based on discussion with Hanson this area was decommissioned in accordance with standard industry practices. Waste oil was handled using the facilities standard operating procedures. No waste oil was stored in this area. All waste oil was handled at the former maintenance shop and was manifested and disposed of properly. Unused oil was distributed to other operating Hanson facilities, and demolition debris was recycled where appropriate. Details regarding the volume of materials removed from this portion of the Site are not available.

Based on the analytical results of the soil samples collected at this portion of the Site, no additional soil samples are proposed to be collected at this portion of AOC #3.

2.1.2 Former Wash Rack System and Lube Shed

The configuration of the former wash rack and lube shed are illustrated on Figure 5. Photographs of these features are included as Attachment 1 to this closure plan. As part of the closure-related activities that were conducted as part of the property transfer from Hanson to Legacy, the steam cleaner, water storage tank, oil-water separator, recycle trap, filters, and pump were all removed. The double containment aboveground waste oil and waste antifreeze tanks were also removed. Each of these features was aboveground and did not include any subsurface features. The subsurface grease trap and double weir are still in place. These are the only subsurface features to remove these features are provided below.

As indicated in Figures 4A and 4B soil samples were collected in 2006 and 2007 from the area around the former wash rack. As indicated soil samples collected in this portion of the Site contained low concentrations of TPH that did not warrant further investigation of remediation.

As requested by the LPFD, the grease trap and double weir and the subsurface piping formally associated with the lube shed will be removed as described below.

2.2 Pre-Field Activities

Prior to removal of the grease trap, double weir, and subsurface piping formally associated with the lube shed the selected contractor will contact Underground Service Alert (USA) to notify them of the work, and will subcontract a private underground utility clearance contractor to clear the proposed excavation locations and nearby areas. As requested, the selected contractor will contact representatives of the LPFD and ACEH at least 72 hours prior to commencing the fieldwork. Representatives of the LPFD and ACEH will be provided updates as project milestones are achieved.

A site-specific Health and Safety Plan (HSP) will be prepared by the selected contractor to address health and safety concerns specific to the planned field activities. Daily health and safety tailgate meetings will be conducted by the selected contractor field personnel prior to beginning any fieldwork and fieldwork will be monitored to ensure that appropriate health and safety procedures are followed during the fieldwork.

The selected contractor will retain a California-licensed General Engineering Contractor ("the Contractor") to provide equipment and experienced personnel to conduct the excavation work. The personnel will have the appropriate Occupational Safety and Health Administration (OSHA) training for sites with affected soil and groundwater (HAZWOPER). Excavation activities will be directed by the selected contractor representative working under the direct supervision of a California Professional Geologist or Professional Engineer.

2.3 Grease Trap and Double Weir Removal

Removal and disposal of oils water and sediment from the grease trap and double weir was discussed in the January 2010 Closure Plan. Prior to removal of the subsurface feature, any remaining liquid will be removed from the grease trap and double weir for off-site disposal or removal. It is anticipated that a service such as Evergreen Oil will be retained to profile, remove, and recycle the material to their treatment, storage, and disposal facility (TSDF) located in Newark, California. Following the removal of the liquid, the Contractor will remove the concrete walled grease trap and double weir using appropriate earthmoving equipment. It is anticipated that the concrete will be stained with oil. As such, the concrete will be segregated and disposal facility, in accordance with the facility's waste soil disposal criteria. If necessary samples of the concrete will be collected and submitted to a



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California-state-certified laboratory for the analysis of TPHd and TPHmo using U.S. Environmental Protection Agency (EPA) test Method 8015, modified, after silica-gel cleanup. Other laboratory analyses may be requested by the disposal facility in order to profile the concrete for disposal.

2.4 Former Lube Shed

Currently, 10 one-inch diameter pipes are present in the area between the former lube shed and the maintenance shop (see Figure 5). It is anticipated that each pipe has been purged of liquid. In order to verify this, compressed air at 10 to 20 pounds per square inch will be injected into each pipe. A container consisting of a 5-gallon bucket or the like will be set on the opposite end of each pipe to contain any liquid that is in the subsurface pipe. The pipes will be monitored for flammable vapors prior to removal.

Once each pipe is purged with compressed air, the concrete overlaying the pipes will be saw cut, removed, and segregated for recycling or disposal. The soil overlying the pipes and the pipes will be removed and recycled or disposed of as a Class II or III nonhazardous solid waste at an appropriate disposal facility, in accordance with the facility's waste soil disposal criteria.

2.5 Excavation Activities

Following the removal of the concrete overlying the concrete walls of the grease trap and weir and the pipes associated with the former Lube Shed, the exposed soil will be visually inspected and screened in the field using a photoionization detector (PID), a flame ionization detector (FID), or a similar instrument, to evaluate the presence of hydrocarbons. Given the close proximity of the grease trap and the double weir, it is anticipated that the features will be combined into one area of excavation.

Field observations, including approximate excavation dimensions, locations and depths of confirmation soil samples, and field screening results, will be recorded on field reports.

If warranted by field observations, the walls of the open excavation for the grease trap and weir and lube pipes will be over-excavated using appropriate earthmoving equipment. The excavation will continue until field observations indicate that no further excavation is warranted. To document that the TPH-affected soil has been removed, confirmation soil sample will be collected as described below.

2.6 Confirmation Soil Samples

One soil sample will be collected for laboratory analyses from the midpoint of the sidewall approximately every 20 linear feet along each sidewall. One soil sample will also be collected from the base of the excavated area, approximately one soil sample for every 400 square feet (20 feet by 20 feet).

It is anticipated that the excavation for the grease trap and weir will result in one area of excavation that will require the collection and analysis of four sidewall confirmation soil samples and one bottom sample. It is anticipated that the excavation for the 10 1-inch diameter pipes will require the collection and analysis of eight sidewall confirmation soil samples and two bottom samples.

The soil samples will be collected in clean, laboratory-supplied containers from soil collected from the backhoe bucket or directly from the sidewall or base of excavation. The sample containers will be labeled with the sample identification, the time and date of collection, the analysis requested, and the initials of the sampler. The samples will be stored in ice-chilled coolers and submitted to the laboratory under strict chain-of-custody protocols.

The selected contractor will submit the confirmation soil samples to a state-certified laboratory when the limits of the excavation are achieved. Each soil sample will be submitted for the analysis of TPHd and TPHmo using EPA test Method 8015, modified, after silica-gel cleanup. If appropriate, soil samples will be analyzed on a rapid turnaround schedule so that analytical results can be reviewed and the need for additional soil excavation can be evaluated and conducted while the excavation contractor is at the Site.

2.7 Soil Disposal

Excavated TPH-affected soil will be profiled for disposal at an appropriate landfill. Based on the analytical results of the soil samples collected at the Site to date, excavated soils are expected to be disposed of as a Class II or III nonhazardous solid waste at an appropriate disposal facility, in accordance with the facility's waste soil disposal criteria.

2.8 Backfill

After the excavation has been advanced at least to the depth necessary and analytical results from the confirmation soil samples indicate that the excavation has

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been advanced sufficiently to remove TPH-affected soil, the excavation will be backfilled with clean fill material. Fill material proposed to be used for this project will be imported from stockpiles of gravel located near AOC #1 at the Site.

2.9 Reporting

The selected contractor will prepare and submit to ACEH and the LPFD a report summarizing the activities described above. The report will include a summary of the following:

- field observations made at the time of excavation and/or structure removal
- the volume and disposition of soil removed from the Site
- the volume and disposition of material that was recycled and disposed
- a summary of the analytical results of the confirmation soil samples
- field forms
- chain-of-custody forms and certified laboratory analytical reports

If you have questions regarding this closure plan, please call Lee Cover of Hanson or me at (510) 652-4500.

Sincerely, ARCADIS U.S., Inc.

Ron Goloubow, P.G. Senior Associate Geologist



Attachments: Figures (1 through 5), Photo Log, Reference List



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FORMER LUBE SHED LOOKING EAST



GREASE TRAP

PHOTOLOG





DOUBLE WEIR



SOIL BORING EB-4 NEAR GREASE TRAP

PHOTOLOG





10 - 1-INCH DIAMETER PIPES AT THE FORMER HEAVY MAINTENANCE SHOP



10 - 1-INCH DIAMETER PIPES AT THE LUBE SHOP

PHOTOLOG





GROUNDWATER MONITORING WELL MW-1



INSIDE THE FORMER LUBE SHED

PHOTOLOG



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