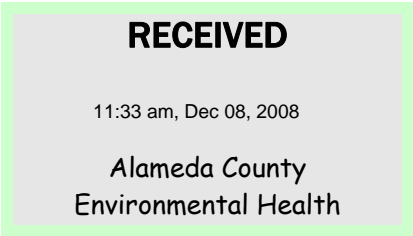




December 5, 2008

001-09567-02

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



**Subject:** Response to Alameda County Environmental Health Request for Additional Information for AOC #1 at the Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California (SLIC Case RO0002952 and Geotracker ID SL0600101555)

Dear Mr. Wickham:

LFR Inc. (LFR) has prepared this letter in response to the Alameda County Environmental Health (ACEH) letter dated October 7, 2008, regarding the “Work Plan for Additional Site Characterization at Selected Areas Within AOC #1” (“the work plan”) at the Hanson Aggregates Northern California (“Hanson”) Radum facility, located at 3000 Busch Road, Pleasanton, California” (“the Site”), dated September 15, 2008.

**ACEH Technical Comments**

The following five technical comments provided by ACEH are directly addressed in this letter (using ACEH’s numbering). ACEH requested a revised work plan (technical comment 3 of the ACEH letter). In lieu of a revised work plan, this letter addresses ACEH’s request by providing the requested revised site plan (attached) and the additional information in the response to technical comment 3.

**1. Facility Closure and Roles of CUPA**

*ACEH Technical Comment.* ACEH has indicated that the Livermore-Pleasanton Fire Department is the Certified Unified Public Agency (CUPA) for this project and the CUPA has requested a closure plan for the facility and separate closure plans for specific areas within the facility.

*Response.* Hanson understands that the Livermore-Pleasanton Fire Department is the CUPA for this project. However, as of December 5, 2008, Hanson has not received a request for closure plans.



## 2. Paving Oil Containment Structure and Truck Scale

*ACEH Technical Comment.* ACEH has indicated that the work plan did not include a proposed sampling plan for the Paving Oil Containment Structure and Truck Scale. The removal of these features will be part of the closure plans requested in technical comment 1.

*Response.* Hanson and LFR concur that soil samples should be collected following the removal of the Paving Oil Containment Structure and Truck Scale. The upcoming closure plan for these facilities will include the collection and analysis of soil samples from the former Paving Oil Containment Structure and Truck Scale. However, as of December 1, 2008, Hanson has not received a request for these plans.

## 3. Proposed Sampling Locations

*ACEH Technical Comment.* ACEH requested a more detailed map or aerial photograph of AOC #1 to illustrate the site features that were formerly at this portion of the property for the purpose of determining the locations for additional soil sampling.

*Response.* The attached revised site plan provides more detailed information regarding the specific uses of the concrete footings and foundations that are currently at the Site. In addition, the revised map indicates which structures are to remain at the Site and which structures will be removed as part of the site closure-demolition plan. As discussed above, additional soil sampling is anticipated as part of the future closure plans for these facilities. The concrete structures that are left in place in this portion of the Site are structural features such as footings and foundations that were formerly associated with pieces of equipment that were part of the asphalt plant.

Proposed soil borings B36 and B37 are located near a concrete pad that is intended to remain in place. The concrete pad was formerly associated with a pug mill mixer that was at the Site. Pug mill mixers are machines used for mixing aggregate and asphalt materials. At this plant, the pug mill was used to mix hot bituminous asphalt cement with the heated aggregate. Therefore, soil samples to be collected from soil borings B36 and B37 are intended to provide data regarding soil quality near the former pug mill.

Proposed soil boring B38 is located near a concrete pad that was formerly associated with the dust collector. Because there are no suspected sources of total petroleum hydrocarbons associated with the operation of the dust collector, soil samples are proposed to be collected from only one soil boring (B38), located near the mid point of that former structure.

Proposed soil borings B39 and B40 will be located near two concrete footings and the former storage shed. Based on information provided by LFR's inspection and Hanson, it is our understanding that the shed was used for the storage of spare parts or "dry goods" such as bag filters, metal fittings, and hand tools. The contents of the shed will be removed during as part of the site closure-demolition plan; however, the metal building is to remain in place.



Based on the previous use of these concrete features as structural features and the previous soil samples collected at AOC #1, LFR and Hanson are not recommending any additional soil sampling locations.

#### 4. Soil Sampling

*ACEH Technical Comment.* ACEH requested that, in the absence of odor, visible staining, or elevated photoionization detector measurements, Hanson collect soil samples from the proposed soil borings at AOC #1 from the depths of 1.5, 3, 5, and 8 feet below ground surface (bgs). The sample collected from approximately 8 feet bgs will be placed on hold at the laboratory pending the analysis of the samples collected from 1.5, 3, and 5 feet bgs.

*Response.* Hanson and LFR concur with this comment, and agree to this protocol for soil borings at AOC #1.

#### 5. Investigation-Derived Waste (IDW)

*ACEH Technical Comment.* ACEH requested that the IDW be placed in 55-gallon drums and requested a description of the management of the drums.

*Response.* Hanson and LFR concur with this comment. The IDW generated during the drilling of the soil borings will be placed in Department of Transportation-approved 55-gallon steel drums and stored at AOC #1. The lid of the drums will be bolted closed and labeled as non-hazardous material and properly characterized in accordance with the requirements of the landfill selected for disposal of the IDW. Based on the analytical results of samples previously collected at the Site, the IDW (soil) will likely be classified as Class II waste and may meet the criteria for alternative daily cover at the landfill. The soil will likely be disposed of when the removal action (excavation work) takes place at the Site.

Following your review of this letter, please do not hesitate to contact Ron Goloubow at (510) 652-4500 or Lee Cover of Hanson at (925) 244-6584, if you have questions or comments regarding our responses to your technical comments or the project in general.

Sincerely,

A handwritten signature in cursive script that reads "J. Scott Seyfried".

J. Scott Seyfried, P.G. #7374, CH.G. #764  
Principal Hydrogeologist

A handwritten signature in cursive script that reads "Ron Goloubow".

Ron Goloubow  
Senior Associate Geologist



Attachment: Revised Site Plan (Figure 2)

cc: Mr. Lee Cover, Hanson Aggregates Northern California

