



April 7, 2011

Mr. Lee W. Cover
Hanson Aggregates Northern California
12667 Alcosta Blvd, Suite 400
San Ramon, CA 94583

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

Subject: Review and Comments for Revised Closure Plan, Area of Concern 2 and 3, Hanson Aggregates Radium Facility, 3000 Busch Road, Pleasanton California 94566

Dear Mr. Cover and Mr. Dunn:

The Livermore-Pleasanton Fire Department (LPFD) has reviewed the Revised Facility Closure Plan (Closure Plan), dated May 28, 2010, prepared by ARCADIS U.S., Inc. Thank you for submitting this closure plan document.

In November 2009, Lee Cover of Hanson, provided a document entitled Closure Plan Report, Radum Plant, dated January 2005, prepared by Baseline Environmental (Baseline Report). Prior to November 2009, LPFD had not received the Baseline Report. The Baseline Report has been reviewed, and along with the Closure Plan, is referenced in this letter.

LPFD's comments for each Area of Concern (AOC) follow:

Comments for AOC 2

Based on your representation that the information you have provided is accurate, and the current use of the Idle Truck Maintenance Shop by Pleasanton Garbage Service continues, the LPFD does not have any comments at this time. LPFD will defer to Alameda County Environmental Health (ACEH) for this part of the site closure.

Comments for AOC 3

Wash Rack System (grease trap, weir and wash area):

1. Will the structures be cleaned prior to demolition and removal? (This might help with the stained concrete and related disposal concerns discussed in the Plan). If so, please update the Plan accordingly.

3560 Nevada Street, Pleasanton, CA 94566

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2. Provide a list of the materials and wastes conveyed and/or contained in this wash rack system.
3. Based upon the #2 above, please provide the specific laboratory analysis that will be used to determine the proper disposal path(s) for the materials to be removed from this system.
4. Please review the historical configuration(s) of this wash rack system. Confirm that the system was always a closed system, and did not discharge to any other surface or subsurface location (Cope Pond, etc.).
5. LPFD will defer to ACEH for any required soil and/or ground water sample locations, frequencies and analysis.

Lube Shed and Related Piping:

1. Provide a list of the specific materials and wastes, if any, conveyed in these piping systems.
2. The Plan states that compressed air will be used to purge the piping of any remaining materials. Since some of the materials included combustible liquids and lubricants, the piping must be purged with an inert compressed gas (i.e., nitrogen, helium, etc.). Compressed air may not be used. Please update the Plan accordingly.
3. LPFD will defer to ACEH for any required soil and/or ground water sample locations, frequencies and analysis.

Comments for Area East of AOC 3 (east of office building and parking lot):

The Plan submitted, along with the Baseline Report, provides more site details including locations of previous hazardous materials and waste activity at the site. Based upon the documents submitted, LPFD has the following concerns:

1. The electrical transformer locations and disposal information in the Baseline Report (section 2.1.5) was helpful, but there are two (2) additional substations not addressed. These additional substations were located east of the large conveyer system, one to the north and one to the south. For locations, please see the site map in the Baseline Report (Appendix B, page 4 of 13).

Please provide additional information on these substations and the related transformer units. Include transformer and oil disposal documentation, related PCB concentrations, and soil sampling of the areas adjacent to these substations.

2. The hazardous materials inventory from the Mach 1998 Hazardous Materials Business Plan (Baseline Report, Appendix B) indicates lubricants and cleaning solvent were stored in Plant Lube Storage Area (C/C1). Please provide additional information on

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the type of solvent that was stored in this area and any soil sample results obtained adjacent to this structure.

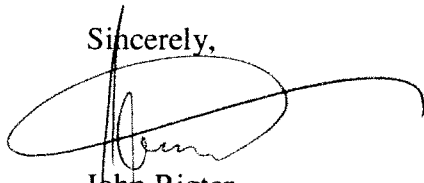
3. Currently LPFD will defer to ACEH for any required soil and/or ground water sample locations, frequencies and analysis.

Additional Comments:

1. Many of the Hazardous Waste Manifests included with the Baseline Report do not have signed Treatment, Storage and Disposal Facility (TSDF) copies. These need to be provided to confirm the waste reached the facility. (The TSDF's indicated on the documents should be able to provide these.)
2. Please clarify who will directly supervise this facility closure including, but not limited to, excavation activities, field sampling and analysis, material disposal, documentation, and the related closure report. LPFD concurs with ACEH that this individual should be a California Professional Geologist or Professional Engineer.
3. LPFD concurs with the May 28, 2010 date (stated in ACEH's comments letter) for submitting the Revised Closure Plan.

If you have any questions, I can be reached directly at (925) 454-2333.

Sincerely,



John Rigter
Fire Inspector
Livermore Pleasanton Fire Department

Cc: Jonathan P. Lowell, City Attorney, City of Pleasanton, P.O. Box 520, Pleasanton CA 94566 (Sent via E-mail to: jlowell@ci.pleasanton.ca.us)

Jerry Wickham, Alameda County Health Care Services 1131 Harbor Bay Pkwy., Suite 250, Alameda CA 94502 (Sent via E-mail to: jerry.wickham@acgov.org)

Cheryl Dizon, Zone 7 Water Agency, 100 North Canyons Pkwy., Livermore CA 94551 (Sent via E-mail to: cdizon@zone7water.com)

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