



October 4, 2012

Mr. Lee W. Cover (*Sent via E-mail to: Lee.Cover@hanson.biz*)  
Hanson Aggregates Northern California  
12667 Alcosta Blvd, Suite 400  
San Ramon, CA 94583

Mr. Steven Dunn (*Sent via E-mail to: dunn@legacypartners.com*)  
Legacy Partners  
4000 East Third Ave, Suite 600  
Foster City, CA 94404-4805

Ms. Debra Patterson (*Sent via E-mail to: dpatterson@lionstonegroup.com*)  
Lionstone Group  
100 Waugh, Suite 600  
Houston TX 77007

Subject: Review and Comments for Revised Closure Plan, Area of Concern 2 through 5, Hanson Aggregates Radium Facility, 3000 Busch Road, Pleasanton California 94566

Dear Responsible Parties:

The Livermore-Pleasanton Fire Department (LPFD) has reviewed the Revised Facility Closure Plan (Plan), dated December 12, 2011 prepared by ARCADIS U.S., Inc. Thank you for submitting this closure plan document.

LPFD's comments for each of the Areas of Concern (AOC) follows:

#### AOC #2

Based on the information you have provided for this area to date, the LPFD does not have any comments at this time. When Pleasanton Garbage ceases to use this area, LPFD will need to conduct an initial closure inspection of the shop and outdoor areas. This is needed to proceed with the closure process on this part of the site. In the interim, LPFD will defer to Alameda County Environmental Health (ACEH).

#### AOC #3

1. **Section 3.1 through 3.3.** The scope of work provided generally addresses our comments from April 7, 2011. If additional piping or structures are encountered; removal and additional investigation may be required. Please include language in the revised Plan acknowledging this.
2. **Section 3.2.3.** The Plan states that "inert compressed air" and "inert compressed air (helium)" will be used to pressure test, and purge the piping of any remaining materials. Since these 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.

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3560 Nevada Street, Pleasanton, CA 94566

Administration & Suppression  
(925) 454-2361  
Fax 249-2397

Fire Prevention Bureau  
(925) 454-2361  
Fax 454-2367

3. **Section 3.5 through 3.7.** The locations of the Former Power Stations, Former Plant Lube Storage Shed/Warehouse, and Transformers are not well defined in the Plan. The location methods, and related changes to the Closure Plan proposed by ACEH in their comments letter of October 2, 2012, are acceptable to LPFD.
4. **Section 3.1 through 3.9.** LPFD will defer to ACEH for the required soil and ground water investigation methods, including (but not limited to) location of excavations, borings, samples, frequencies and analysis.

#### **AOC #4**

Based on your representation that the information you have provided for this area is accurate and correct, LPFD does not have any comments at this time. LPFD will defer to ACEH for this part of the site closure.

#### **AOC #5**

Based on your representation that the information you have provided for this area is accurate and correct, LPFD does not have any comments at this time. LPFD will defer to ACEH for this part of the site closure.

#### **Comments for Disposal (6)**

The Closure Report shall include all disposal documentation related to the site closure (hazardous and non-hazardous), with signed TSDF copies. Please include language in the revised Plan acknowledging this.

#### **Comments for Backfill (7)**

LPFD will defer to ACEH for these requirements.

#### **Comments for Site Closure Schedule (8)**

LPFD has no comments at this time.

#### **Comments for Reporting (9)**

Many of the previously submitted Manifests are not signed by the Treatment, Storage and Disposal Facility (TSDF). These shall be submitted to confirm the waste reached the facility. Please include language in the revised Plan acknowledging this.

The Closure Report shall include all disposal documentation related to this site closure (hazardous and non-hazardous), with signed TSDF copies. Please include language in the revised Plan acknowledging this.

#### **Additional Comments**

1. Please provide a current site map indicating current ownership of each parcel at the site.
2. Date for submitting the Revised Closure Plan: December 3, 2012.

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](mailto:jlowell@ci.pleasanton.ca.us)*)

Danielle Stefani, Livermore –Pleasanton Fire Department, 3560 Nevada Street, Pleasanton CA 94566  
(*Sent via E-mail to: [dstefani@lpfire.org](mailto:dstefani@lpfire.org)*)

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](mailto:jerry.wickham@acgov.org)*)

Colleen Winey, Zone 7 Water Agency, 100 North Canyons Pkwy., Livermore CA 94551 (*Sent via E-mail to: [cwiney@zone7water.com](mailto:cwiney@zone7water.com)*)

Ron Goloubow, LFR, 1900 Powell Street, 12<sup>th</sup> Floor  
Emeryville, CA 94608-1827 (*Sent via E-mail to: [Ron.Goloubow@lfr.com](mailto:Ron.Goloubow@lfr.com)*)

Voytek Bajsarowicz, Haley & Aldrich, 2033 North Main Street, Suite 309, Walnut Creek, CA 94596  
(*Sent E-mail to: [VBajsarowicz@haileyaldrich.com](mailto:VBajsarowicz@haileyaldrich.com)*)