

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

February 26, 2008

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

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

Subject: SLIC Case RO0002952 and Geotracker Global ID SL0600101555, Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566

Dear Mr. Cover and Mr. Dunn:

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 work plan entitled, "Work Plan for Additional Site Characterization at AOC #8, Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California, SLIC Case RO0002952 and Geotracker Global ID SL0600101555," dated February 6, 2008 and prepared on your behalf by LFR Environmental Management and Consulting Engineering. We have also received a second work plan for the above referenced case entitled, "Work Plan for Soil and Groundwater Sampling and Remediation, Hanson Radum Plant, Pleasanton, California," dated February 6, 2008 and prepared by ENV America. Both work plans were submitted in response to technical comments in ACEH correspondence dated November 28, 2007. The LFR work plan responds to ACEH technical comment #4 on our November 28, 2007 correspondence regarding AOC #8. The ENV America work plan responds to ACEH technical comments #2, 3, and 5 in our November 28, 2007 correspondence.

The proposed scope of work in both work plans may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. 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 technical reports requested below.

TECHNICAL COMMENTS ON LFR WORK PLAN

1. **Proposed Monitoring Wells.** The Work Plan currently proposes installation of two monitoring wells south of the existing soil borings for horizontal delineation. The groundwater flow direction in AOC #8 is unknown. However, the regional hydraulic gradient in the Upper Aquifer as shown on Livermore-Amador Basin Groundwater Contour Maps prepared by the Zone 7 Water Agency is generally to the north or northwest. The hydraulic gradient in AOC #1 is to the northwest based upon water levels measured in recently installed monitoring wells in AOC #1. Cope Pond and Lake I are north and northwest, respectively, of AOC #8. Based upon this regional information, it appears that the groundwater flow direction in AOC #8 is more likely to be toward the north or northwest rather than south. Therefore, we request that the proposed locations of soil borings and monitoring wells be adjusted as shown on Attachment A – Revised Monitoring Well Locations to install monitoring wells north and northwest of the areas where shallow groundwater contamination has been detected. In order to determine the groundwater flow direction, we request that you install a total of three monitoring wells within the regional aquifer, also shown on Attachment A – Revised Monitoring Well Locations. Please present the results in the AOC#8 Site Investigation Report requested below.
2. **Well Development and Sampling.** We request that the well be developed a minimum of 24 hours after installation in order for the grout to set. We also request that the well be sampled a minimum of 48 hours after development in order for groundwater conditions in the area of the well to recover from disturbances caused by drilling and development. The proposed groundwater analyses are acceptable. Please present the results in the AOC#8 Site Investigation Report requested below.

TECHNICAL COMMENTS ON ENV AMERICA WORK PLAN

3. **Monitoring Well in B-1A Area.** The proposed installation of a monitoring well in the B-1A boring area is generally acceptable. We request that the well be sampled a minimum of 48 hours after development in order for groundwater conditions in the area of the well to recover from disturbances caused by drilling and development. The proposed groundwater analyses are acceptable. Groundwater samples are to be analyzed for BTEX using EPA Method 8021B in addition to the proposed analyses for TPH as diesel and TPH as motor oil using EPA Method 8015M. Please present the results in the AOC #3 Site Investigation and Excavation Report requested below.
4. **Proposed Excavation in EB35 Area.** The proposed excavation and confirmation soil sampling in the EB35 Area 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 visually 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

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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 #3 Site Investigation and Excavation Report requested below.

5. **Re-Sampling of Existing Monitoring Well 3S/1E 10D8.** The results presented from re-sampling of monitoring well 3/S1E 10D8 indicate that semivolatile organic compounds and mercury were not present at concentrations above the reporting limits. No further sampling of well 3/S1E 10D8 is requested at this time.

TECHNICAL REPORT REQUEST

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

- **June 20, 2008** – AOC #8 Site Investigation Report
- **July 11, 2008** – AOC #3 Site Investigation and Excavation 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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was

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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).

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 fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

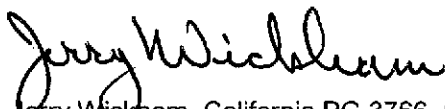
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to 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 fuel leak 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 contact me my electronic mail at jerry.wickham@acgov.org.

Sincerely,



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

Attachment A: Revised Monitoring Well Locations

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, 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

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

Attachment A - Revised Monitoring Well Locations

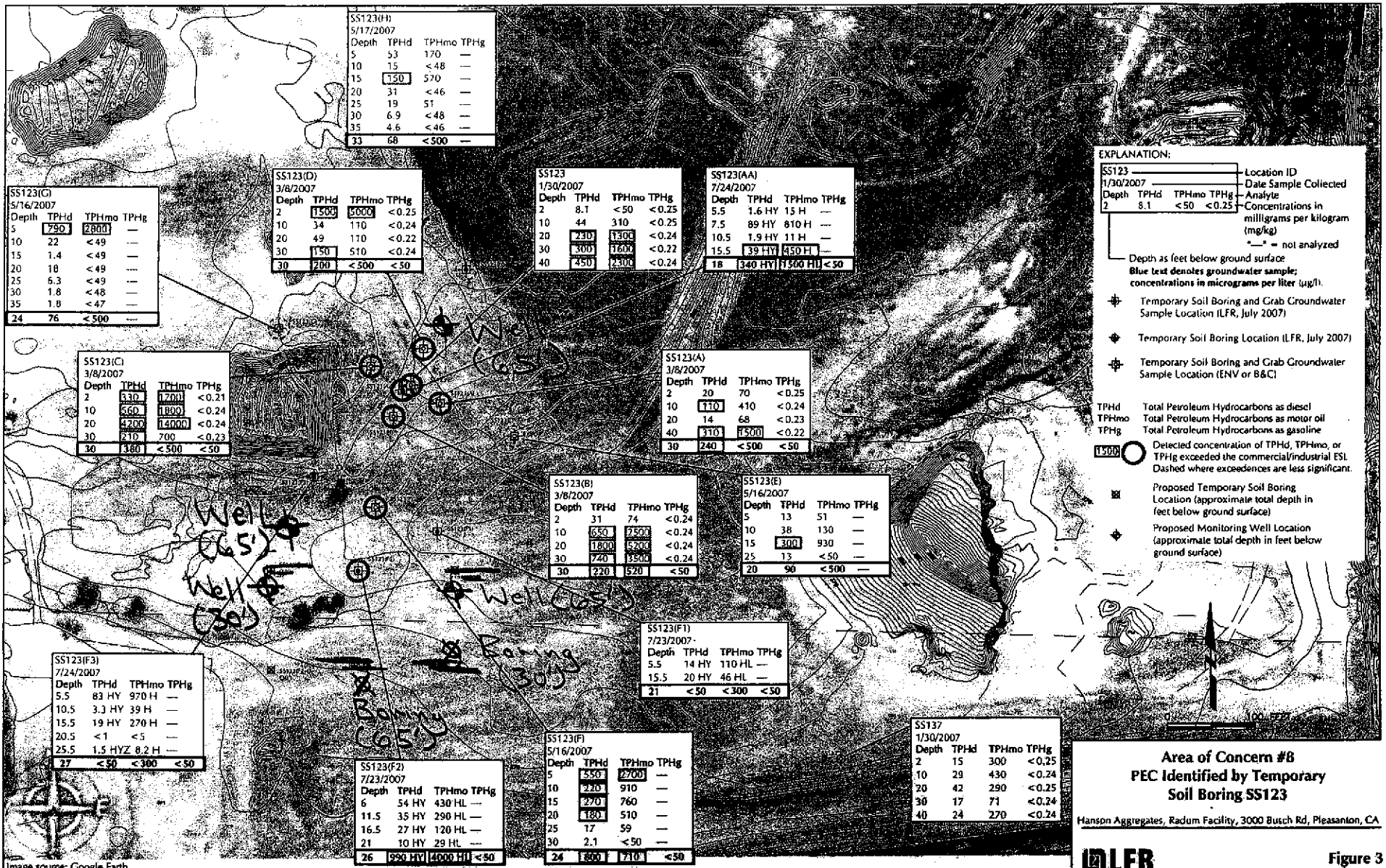


Image source: Google Earth
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