

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

June 13, 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 report entitled, "*Groundwater Monitoring Well Installation, Development, Sampling and Soil Excavation Report, Legacy Hanson Radum Site, 3000 Busch Road, Pleasanton, California, SLIC Case RO0002952 and Geotracker Global ID SL0600101555,*" dated April 17, 2008. The report, which was prepared on behalf of Legacy Partners Commercial, LLC by ENV America, presents the results from installation and sampling of one monitoring well adjacent to previous boring B-1A and results from shallow soil excavation in the area of former boring EB-35.

The Hanson Radum facility has been subdivided into Areas of Concern (AOCs) for the purpose of conducting soil and groundwater investigations (Levine Fricke 2007). All activities discussed in the April 17, 2008 report were conducted within AOC #3. Shallow soil excavation and sampling was conducted in the area of former boring EB-35 to evaluate petroleum hydrocarbons detected in soil in the area of soil borings EB-35, EB-35A, EB-35B, EB-35C, and EB-35D.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Shallow Soil Excavation in EB35 Area.** Asphaltic materials were observed in shallow soils during excavation in the area of EB-35 and EB-35B. Soil samples were collected from the asphaltic material and from soil directly below the asphaltic layer. TPH as diesel and TPH as motor oil were detected at significantly higher concentrations in the asphaltic material than in the underlying soil. Based on these sample results, the April 18, 2008 ENV America report concluded that the asphaltic material leaches out during the analytical procedures but does not leach out under ambient field conditions. ENV America

recommends that no additional excavation or soil sampling is necessary in this area of the site. We concur that no additional excavation or investigation is required in the EB-35 area at this time.

2. **Monitoring Well in B-1A Area.** Monitoring well ENV-1 was installed to investigate water quality in the area of former boring B-1A. A grab groundwater sample collected in July 2007 from a depth of approximately 68 feet bgs from boring B-1A contained TPH as diesel at a concentration of 79 micrograms per liter ( $\mu\text{g/L}$ ) and TPH as motor oil at a concentration of 1,100  $\mu\text{g/L}$ . Well ENV-1 was installed with a screened interval from approximately 13 feet bgs to 23 feet bgs with the filter pack extending to a depth of 28.5 feet bgs. The static water level in ENV-1 was 15.7 feet below the top of casing three days after development. The depth to water measured in well ENV-1 was significantly shallower than the expected depth to water based on results from boring B-1A. A groundwater sample collected in March 2008 from well ENV-1 did not contain detectable concentrations of TPH as gasoline, TPH as diesel, TPH as motor oil, or BTEX. ENV America recommended no further action with respect to groundwater in this area and recommended abandoning well ENV-1. We do not concur with abandoning well ENV-1 at this time. We request that well ENV-1 be sampled to confirm the previous results. Please re-sample well ENV-1 and present the results in the Well Sampling Report requested below. The Well Sampling Report must include a field sampling sheet that documents water level measurements prior to, during, and following purging, purging and sampling methods, purge volumes, and parameter stabilization. Analysis of the groundwater sample for TPH as diesel, TPH as motor oil, TPH as gasoline, and BTEX is acceptable.

#### TECHNICAL REPORT REQUEST

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

- **September 13, 2008** – Well Sampling 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require

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electronic submittal of information for all 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is 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](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.

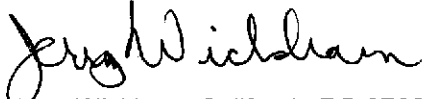
#### AGENCY OVERSIGHT

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.

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If you have any questions, please call me at (510) 567-6791 or contact me my electronic mail at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



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

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, 12<sup>th</sup> Floor, Emeryville, CA 94608-1827

Voytek Bajsarowicz, ENV America, 244 California Street, Suite 500,  
San Francisco, CA 94111

Allan Atkinson, ENV America, 244 California Street, Suite 500,  
San Francisco, CA 94111

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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.

#### REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:  
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

#### Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

#### Submission Instructions

- 1) Obtain User Name and Password:
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
    - or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
  
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape and Firefox browsers will not open the FTP site.
  - b) Click on File, then on Login As.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
  
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto:firstname.lastname@acgov.org))
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)