

By Alameda County Environmental Health at 4:24 pm, Aug 21, 2013

USL Pleasanton Lakes, L.P.

20 August 2013

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely yours,

USL PLEASANTON LAKES, L.P.

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20 August 2013

Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502

Attention:

Mr. Jerry Wickham, PG

Livermore-Pleasanton Fire Department 3560 Nevada Street Pleasanton, California 94566

Attention:

Mr. John Rigter

Subject:

Work Plan for Excavation and Demolition of the Wash Rack, Clarifier, Fenced

Area/Concrete Slab, Associated Drainage Systems East of the Idle Truck Maintenance Building, and Concrete Piping Trench South of the Idle Truck Maintenance Building -

Former Hanson Aggregates Radum Facility

3000 Busch Road

Pleasanton, California 94566

ACEH SLIC Case Number RO0002952

RWQCB GeoTracker Global ID SL0600101555

Gentlemen:

This work plan has been prepared by Haley & Aldrich, Inc. (Haley & Aldrich) on behalf of USL Pleasanton Lakes, L.P. specifically for excavation and demolition of the wash rack, clarifier, fenced area/concrete slab east of the clarifier, associated drainage systems east of the Idle Truck Maintenance Building, and the concrete piping trench south of the Idle Truck Maintenance Building in Area of Concern (AOC) #2 at the former Hanson Aggregates Radum Facility located at 3000 Busch Road, Pleasanton, California. This work plan specifies the general scope of work to remove the above structures and any associated contaminated liquid, sludge, and soil.

SCOPE OF WORK

Haley & Aldrich's contractor, ETIC Engineering, Inc. (ETIC) will excavate and dispose of concrete, piping, sludge, liquid, and soil at the concrete structures tentatively identified as a wash rack, clarifier, fenced area/concrete slab, drainage systems, and the concrete piping trench as described below:

A pipe from the Idle Truck Maintenance Building (that appears to convey drainage from at least one drop inlet near the building) to the clarifier structure (estimated to be 90 linear ft).

- A pipeline from the wash rack to the clarifier (estimated to be 45 linear ft).
- The clarifier (estimated to be 20 ft by 10 ft by 9 ft deep) consisting of approximately 35 cubic yards of concrete and an undetermined amount of uncharacterized contents (liquid and sludge).
- The concrete slab in the fenced area immediately east of the clarifier (estimated to be approximately 30 ft by 50 ft) consisting of a single concrete slab (up to 8 inches thick) and any associated drop inlets and piping.
- The wash rack (estimated to be approximately 15 ft by 65 ft) and associated drop inlets consisting of a single concrete slab (up to 8 inches thick).
- A concrete piping trench extending from the southeast corner of the Idle Truck Maintenance Building for approximately 560 ft. to the south to an area approximately 160 ft north of the property boundary.

Pipe from the Idle Truck Maintenance Shop to the Clarifier

Any liquid and sludge remaining in this pipe (Figure A-1) will be flushed to the clarifier prior to excavation and removal of the pipe. Soil samples will be collected from the bottom and sidewalls of the excavated trench approximately every 20 ft and analyzed as specified under "Sampling" below. Samples will also be collected from any stained, discolored, and odiferous areas and analyzed. The pipe will be cut up and disposed of or recycled as appropriate.

Pipe from the Wash Rack to the Clarifier

Any liquid and sludge remaining in this pipe (Figure A-1) will be flushed to the clarifier prior to excavation and removal of the pipe. Soil samples will be collected from the bottom and sidewalls of the excavated trench approximately every 20 ft and analyzed as specified under "Sampling" below. Samples will also be collected from any stained, discolored, and odiferous areas and analyzed. The pipe will be cut up and disposed of or recycled as appropriate.

Clarifier

Prior to beginning the excavation and demolition of the clarifier unit (Figure A-1), any liquid and/or sludge currently contained within the clarifier or pipelines will be sampled by Haley & Aldrich and the samples will be submitted to TestAmerica Laboratories for analysis for the same target list of constituents as the confirmation soil samples. ETIC will then remove and dispose of the sludge/liquid. With regard to what was historically contained in the clarifier, Haley & Aldrich is not privy to that information and the former owner has generally not been responsive in providing such information when requested.

Once all sludge and liquid have been removed from the clarifier ETIC will break up and remove the clarifier structure and either dispose of or recycle the concrete as appropriate. After the concrete has been removed from the excavation any stained, discolored, and odiferous soil will be removed from the excavation and confirmation sampling will be performed as described below under "Sampling."



Fenced Area/Concrete Slab

The fence will be removed from around the concrete slab (Figure A-1) and the slab and any drop inlets will be broken up and the concrete will be recycled. Samples of the soil will be collected for analysis from off the edge of the slab at likely locations where surface runoff may exit the slab and from beneath all drop inlets and below any features within the slab that potentially could be points of discharge from the slab.

Wash Rack

The concrete slab constituting the wash rack (Figure A-1) and any drop inlets will be broken up and the concrete will be recycled. Samples of the soil will be collected for analysis from off the edge of the slab at likely locations where surface runoff may exit the slab and from beneath all drop inlets and below any features within the slab that potentially could be points of discharge from the slab.

Concrete Piping Trench

A concrete piping trench exists extending from the vicinity of the southeast corner of the Idle Truck Maintenance Building, south for approximately 560 ft. The piping in the trench was found to contain clear diesel fuel. Five days before ETIC is ready to evacuate this fuel from the pipe, Haley & Aldrich will notify the Livermore-Pleasanton Fire Department (John Rigter). The procedure used to evacuate the fuel from the line will consist of using a vacuum truck to suck out the fuel, then flushing the line with two pipe volumes of water. The lines will then be purged with nitrogen. The contents of the vacuum truck will be drained into drums and the truck will be rinsed with water. The drums will be labeled and placed with other waste from the lube shed in our containment area for transportation and disposal. The volume of fuel left in the lines is calculated to be less than 20 gallons.

Once the fuel is removed from the lines the concrete and pipelines will be broken up and removed from the trench and recycled/disposed as appropriate. Soil samples will be collected from beneath each joint and any holes in the pipeline and analyzed for total petroleum hydrocarbons as gasoline, diesel, and motor oil (TPHg, d, and mo) by EPA Method 8015. Any samples found to exceed the stated criteria for the site shall be overexcavated to the extent required by Alameda County Health Care Services Agency (ACEH).

Sampling

If visually stained, discolored, or odiferous soil is present in the bottom or sidewalls of an excavation it will be removed by overexcavation. The final dimensions of excavations shall be at the direction of ACEH in the field. ACEH (Jerry Wickham) and Livermore-Pleasanton Fire Department (John Rigter) will be notified at least 5 days prior to performing excavations associated with this addendum. Staining, discoloration, or odor notwithstanding, confirmation samples, with the exception of the concrete piping trench, which will be sampled beneath every pipe joint, will be collected at a rate of one sample per every 20 linear ft in the excavation sidewalls and one sample per every 400 square ft in the bottom of the excavation regardless of visual observations. Confirmation samples will be analyzed by



TestAmerica Laboratories, Inc. for the specified constituents by the following analytical methods, with the exception of the concrete piping trench soil samples, which will only be analyzed for TPHg, TPHd, and TPHmo using EPA Method 8015:

- TPHg, TPHd, and TPHmo using EPA Method 8015;
- cadmium (Cd), chromium (Cr), lead (Pb), nickel (Ni), and zinc (Zn) using EPA Method 6010B;
- full scan target list for VOCs, BTEX, MTBE, and lead scavengers (ethylene dibromide [EDB];
- 1,2-dichloroethane [1,2-DCA]) using EPA Method 8260B;
- polychlorinated biphenyls (PCBs) using EPA Method 8082; and
- polycyclic aromatic hydrocarbons (PAHs) using EPA Method 8270C SIM.

If a confirmation sample's analytical results do not meet the specified clean up criteria, the area represented by that sample will be overexcavated and resampled. In general, and with the approval of ACEH, sidewall samples will be overexcavated into the excavation face by 1 ft and laterally along the length of the excavation sidewall one-half way to the nearest compliant sample or to the end of the excavation sidewall, whichever is less. Bottom samples with analytical results that don't meet the specified cleanup criteria will be overexcavated by 1 ft in depth and laterally one-half the distance to the nearest compliant sample and a new bottom confirmation sample will be collected until the bottom of the excavation meets site cleanup criteria.

Utilities and Health and Safety

Underground Service Alert (USA) will be contacted a minimum of 48 hours prior to any excavation to provide utility clearances. A private utility locator will also be employed to map subsurface utilities in the areas to be excavated. The health and safety plan being used to perform the work under the master closure plan for the site will be modified to include this new work.

Backfill and Compaction

All excavations will be backfilled in 8- to 12-inch moisture compacted lifts of on-site material approved by ACEH. Haley & Aldrich will perform compaction testing to document that adequate compaction has been achieved.



CERTIFICATION

Haley & Aldrich, Inc. has prepared this work plan for the Former Hanson Aggregates Radum Facility, located at 3000 Busch Road, Pleasanton, California, on behalf of USL Pleasanton Lakes, L.P. in a manner consistent with the level of care and skill ordinarily exercised by professional geologists and environmental scientists. This report was prepared under the technical direction of the undersigned California Professional Geologist.

Kristin Guthrie, P.G.

8/20/13

Date

Geologist

California Professional Geologist No. 9090







LEGEND

FEATURE OF INTEREST

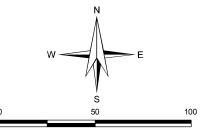
 UNDERGROUND PIPING **- - -** APPROXIMATE PIPING ALIGNMENT



CONCRETE PIPING TRENCH

ONE FOOT ELEVATION CONTOUR

NOTE:
FEATURE LOCATIONS ARE BASED ON INTERPRETATION FROM HISTORICAL AERIAL IMAGES.



SCALE IN FEET

HALEY& FORMER HANSON AGGREGATES RADUM FACILITY 3000 BUSCH ROAD PLEASANTON, CALIFORNIA

CLOSURE PLAN ADDENDUM FACILITY LOCATION MAP.

SCALE: AS SHOWN AUGUST 2013

FIGURE A-1