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REVISED CLOSURE PLAN FORMER HANSON AGGREGATES SITE PLEASANTON, CALIFORNIA

by

Haley & Aldrich, Inc. Walnut Creek, California

for

USL Pleasanton Lakes, L.P. Houston, Texas

File No. 39187-000 23 April 2013



USL Pleasanton Lakes, L.P.

April 23, 2013

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

Attention:

Mr. Jerry Wickham, P.E

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

Attention:

Mr. John Rigter

Subject:

Revised Closure Work Plan Dated 04.23.2013 - Hanson Radum Facility

SLIC Case RO0002941 and Geotracker Global ID SLT19719376

3000 Busch Road

Pleasanton, California 94566

Gentlemen:

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.

Sincerely yours,

USL PLEASANTON LAKES, L.P.

Debra K. Patterson

Enclosures

cc:

Doug McKinnon – w/o enclosures

CERTIFICATION

Haley & Aldrich, Inc. has prepared this revised closure plan for the Hanson 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.

Allan H Atkinson, P.G.

4/23/13

Date

Senior Geologist

California Professional Geologist No. 3515





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1. INTRODUCTION

Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this revised closure plan on behalf of USL Pleasanton Lakes, L.P. (USL) at the request of the Livermore-Pleasanton Fire Department (LPFD) and Alameda County Environmental Health (ACEH) for the former hot mix asphalt plant area (area of concern [AOC] #1) ("the Site") of the former Hanson Aggregates Radum Facility (Hanson) located at 3000 Busch Road, Pleasanton, California ("the Property"; Figures 1 and 2).

This revised AOC #1 closure plan replaces the Revised Closure Plan for the Former Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California ("the 2010 Revised Closure Plan"; LFR 2010a) prepared by LFR, Inc., now an ARCADIS company (ARCADIS). Appendices A and B are directly from LFR's Revised Closure Plan. The 2010 Revised Closure Plan was submitted to ACEH and the LPFD on 29 January 2010. In a letter dated 6 April 2010 ACEH submitted comments and granted conditional approval of the Revised Closure Plan and requested a technical report to document the work performed (ACEH 2010). USL retained Haley & Aldrich in February 2013 based on a request from ACEH to revise and reissue the 2010 Revised Closure Plan incorporating ACEH's comments. The revised 2010 Revised Closure Plan was submitted to ACEH in 26 March 2013. In an email dated 3 April 2013, ACEH requested additional revisions, which are included herein.



2. BACKGROUND

2.1 Property Description and History

The approximately 1,050-acre Property consisting of the former Radum facility is located at 3000 Busch Road, Pleasanton, California, partly within the city limits of Pleasanton and partly within an unincorporated area of Alameda County (Figures 1 and 2). The Property includes three large ponds or lakes (Lake I, Lake H, and Cope Pond), created during historical aggregate mining operations, and approximately 320 acres of developable land (approximately the southern third; Figure 2). During 2007, the majority of the Property was transferred to Legacy Pleasanton Land, LLC (Legacy) as part of a real estate transaction. Legacy obtained ownership of the remainder of the former Radum facility on 30 July 2010 (Haley & Aldrich 2010).

As described in the Phase I Environmental Site Assessment (ESA) report by ENV America Inc. (ENV 2006a), mining of sand and gravel in the Livermore-Amador Valley began prior to 1900. Mining at the Property began in approximately 1938 by Kaiser Sand and Gravel. Reportedly, as sections of the Property were mined out, the former mining pits were used for storage and/or as disposal ponds for water (from dewatering of new pits) and fine-grained sediments (silt and sand) washed out of the aggregate. In addition, some mining pits likely were backfilled with debris and mine waste, as is evident from debris encountered during drilling in various areas of the Property. Hanson purchased the Property in 1991 and continued mining operations until 2001 when mining was discontinued due to lack of available aggregate materials. Based on subsurface investigations conducted throughout the Property, historical mining and aggregate processing operations have resulted in localized petroleum hydrocarbon-affected soil and groundwater in certain areas.

2.2 Regulatory Determinations

ACEH is the lead oversight agency for subsurface environmental conditions. As described in Section 4, numerous environmental investigations have been conducted throughout the Property and in particular at the Site. Previous investigations have included Phase I reviews, Phase II investigations including collecting samples from surface features, drilling temporary soil borings to collect depth-discrete soil and grab groundwater samples, and installing groundwater monitoring wells for groundwater monitoring over time. Subsurface investigations have been conducted under the purview of ACEH.

Based on investigations conducted to date, no further depth-discrete soil or grab groundwater sampling is necessary to further characterize the nature and extent of contamination at the Site. Because of the presence of elevated concentrations of total petroleum hydrocarbon as diesel (TPHd) and as motor oil (TPHmo) in certain areas of the Site, soil remediation consisting of limited soil excavations will be conducted as part of the final closure plan of the Site (described in Section 5.3).

During early 2008, ACEH informed Hanson that the LPFD is the Certified Unified Public Agency for the Site, and as such is responsible for oversight of the closure of surface features at the Site.

2.3 Site Walk

On 18 July 2008, Hanson conducted a Site Walk (the 2008 Site Walk) with the LPFD, ACEH, and ARCADIS, to review conditions at the Site and evaluate the effort necessary to conduct final closure of the Site. The 2008 Site Walk was documented by ARCADIS in the 2010 Revised Closure Plan. Photographs



taken during the Site Walk are provided in Appendix A. During the Site walk, Hanson identified those features planned for demolition and/or removal and those planned to remain on the Site. USL has since indicated that all surface structures and features will be removed from the Site.

According to the 2010 Revised Closure Plan, the LPFD verbally requested that closure plans be submitted for certain individual features planned for closure at the Site. The 2010 Revised Closure Plan described the condition at the time of the Site walk of those surface features identified by Hanson. Descriptions of these features and closure plans for their removal are included in Section 6.



3. PREVIOUS SITE CLOSURE ACTIVITIES

3.1 Temporary Closure of Former Conveyor Culvert

An underground culvert containing a former conveyor system used to deliver aggregate to the hot mix asphalt operation was located approximately on the eastern edge of the Site, immediately southeast of the storage shed. The approximate location of the culvert is shown on Figures 3 and 4. At the request of the LPFD, Hanson conducted an inspection of the culvert and sealed it for safety reasons. The culvert was inspected and sealed on 8 December 2008.

Hanson contracted NRC Environmental Services (NRC) of Alameda, California, to inspect and seal the culvert. NRC's report is provided in Appendix B. NRC personnel entered the culvert using appropriate health and safety equipment and walked its length to inspect its condition and contents. The culvert, constructed out of corrugated metal, was found to be approximately 8 feet in diameter and approximately 130 feet long and stretching approximately to the east from its main entrance. The end of the culvert consisted of a solid wall constructed of concrete and wood. The culvert contained a former conveyor system, a metal support structure, metal pipes, and rubber tubing fastened along the center of the ceiling, and what may have been a motor at the end of the culvert. The culvert was relatively debris-free, although a layer of fine soil lined the floor of the culvert and plastic debris was found at the exit of the culvert. A smaller diameter escape tunnel, also constructed of corrugated metal, was identified near the exit of the main culvert and leading approximately north. The escape culvert was also inspected and found to be approximately 4 feet in diameter and approximately 60 feet long.

No signs of human transient occupancy were identified in either the primary or the escape culverts at the time of closure. The entrances to the main culvert and the escape culverts were subsequently sealed by placing a large amount of soil in front of the entrances.



4. SUBSURFACE INVESTIGATIONS

4.1 Summary of Subsurface Investigations Previously Conducted

To date, several subsurface investigations have been conducted throughout the former Radum Property and at the Site by various consultants, including Baseline, Brown & Caldwell, ENV, and ARCADIS, on behalf of Hanson and Legacy. The results of previous investigations, including various Phase I and Phase II ESAs conducted at the Site, have also been described extensively in reports prepared by ENV and ARCADIS. All investigations, with the possible exception of the Phase I reports and certain initial investigations, were conducted under the purview of ACEH. The primary objectives of previous characterization investigations were to characterize the lateral and/or vertical extent of petroleum hydrocarbons detected in soil and grab groundwater samples.

The most recent subsurface investigation conducted at the Site was completed by ARCADIS in January 2010, with the drilling of six temporary soil borings for depth-discrete soil sampling in the vicinity of certain features planned to remain at the Site, including concrete pads formerly associated with a pug mill mixer and a dust collector, two concrete footings and the former storage shed. USL has since indicated that all structures and surface features in AOC #1 will be removed.

This recent investigation was documented by ARCADIS in the 12 February 2010 report "Area of Concern #1 Additional Soil Investigation Report" (ARCADIS 2010b). This report concluded that no additional subsurface characterization activities are necessary. The proposed subsurface investigation was included in the 2010 Revised Closure Plan. As such, no additional subsurface investigations will be included in this closure plan.

4.2 Groundwater Monitoring

As described in the 28 February 2008 "Work Plan for Additional Well Installations and Quarterly Groundwater Monitoring and Reporting" (LFR 2008a), and approved by ACEH (ACEH 2008a), ARCADIS completed four quarterly groundwater monitoring events during June and September 2008 and January and March 2009. The results of the four quarterly groundwater monitoring events indicated that groundwater has not been significantly affected by petroleum hydrocarbons. Based on the results of the quarterly groundwater monitoring events and the results from previous investigations, and in agreement with a work plan approved by ACEH, ARCADIS recommended that groundwater monitoring cease and that the wells be properly abandoned (LFR 2009). ACEH concurred that routine groundwater monitoring could be discontinued; however, ACEH requested that the groundwater monitoring wells be destroyed only after closure activities have been completed (ACEH 2009). Groundwater monitoring well abandonment is discussed in Section 6.10.

4.3 Conclusions

Conclusions drawn from previous subsurface investigations indicate that:

- The lateral and/or vertical extent of petroleum hydrocarbons in soil has been sufficiently characterized at the Site.
- The area of deep soil contamination (approximately 30 to 40 feet below ground surface [bgs]) identified in the northern half of the Site is relatively old, of limited extent, and immobile; it was



probably buried in place during historical mining operations. It is unlikely to further affect soil or significantly affect groundwater beneath the Site.

- The approximate local groundwater flow direction during 2008 and 2009 was to the northwest.
- Groundwater beneath the Site does not appear to have been significantly affected by TPH detected in soil beneath the Site.

Based on the results of previous subsurface investigations, 11 areas within AOC #1 have been identified for remediation by soil excavation (Figure 3). The 21 March 2008 "Work Plan for the Excavation of Petroleum Hydrocarbon-Affected Soil," submitted to ACEH, presents the rationale, location, and methodology of the proposed soil excavation activities ("the March 2008 Work Plan"; LFR 2008b). This work plan was approved by ACEH on 18 April 2008 (ACEH 2008b). As suggested in the 12 February 2010 report "Area of Concern #1 Additional Soil Investigation Report," three additional excavation areas are proposed. The procedures for planned soil excavations and confirmation sampling activities are described in Section 5.



5. REMEDIATION ACTIVITIES

Soil excavation and confirmation sampling will be conducted in accordance with the procedures presented in the March 2008 Work Plan (LFR 2008b) and the 2010 Revised Closure Plan (ARCADIS 2010a), both conditionally approved by ACEH on 18 April 2008 (ACEH 2008b) and 6 April 2010 (ACEH 2010), respectively. These procedures are described in Sections 5.2 through 5.6, below.

5.1 Proposed Cleanup Goals

The cleanup goals that will be used to evaluate confirmation sampling results are found in "Summary Table A; Environmental Screening Levels (ESL); Shallow Soils (≤ 3 m bgs); Groundwater Is Current or Potential Source of Drinking Water" published by the Regional Water Quality Control Board (RWQCB) for TPHd TPHmo, and naphthalene (RWQCB 2013). Though the Site is intended for future commercial/industrial use, USL will attempt to remediate the property to residential standards. However, the Site owner makes no guarantee regarding compliance with the residential ESLs. As requested by ACEH, a deed restriction will be implemented to limit future land use to commercial and industrial land use for AOC#1 if residential ESLs are not achieved.

The ESLs for the primary contaminants of concern (COCS) encountered at the Site (TPHd and TPHmo) in both residential and commercial/industrial land use areas are presented in the table below. Per the email correspondence dated 3 April 2013 from ACEH, naphthalene ESLs for soil have been included in the table; however, naphthalene is not considered a primary COC at the Site.

	ESL	ESL for groundwater $(\mu g/l)$	
Compound	Residential Land Use	Commercial/Industrial Land Use	All Land Use Areas
TPHd	83	83	100
TPHmo	500	2,500	100
Naphthalene	1.2	1.2	2.6

Proposed Cleanup Goals

Excavations will be advanced until TPHd and TPHmo concentrations in confirmation samples are less than the applicable cleanup goals or to a maximum depth of 8 feet bgs.

5.2 Pre-Field Activities

Haley & Aldrich will prepare a site-specific Health and Safety Plan (HSP) to describe the assessment and procedures to be implemented to minimize field personnel exposure to environmental and physical hazards specific to the Site and activities conducted therein. It will be implemented throughout the field program to ensure a safe work environment. The field personnel will be required to review and sign the HSP prior to commencing work at the Site. Health and safety tailgate meetings will be conducted by the Haley & Aldrich field staff with any subcontractors on-site prior to the start of work each day. Fieldwork will be monitored to ensure appropriate health and safety procedures are followed. If site conditions change, the HSP will be updated as necessary to protect workers and the public.

Haley & Aldrich will notify ACEH and the LPFD at least 5 days prior to the start of excavation activities and surface structure removal at AOC #1. Seventy-two hours prior to excavating TPH-affected soil, Haley



& Aldrich will contact Underground Service Alert to notify them of the work, and will subcontract a private underground utility clearance contractor to clear the proposed excavation locations and nearby areas.

5.3 Soil Excavation

Eleven areas will be excavated to remove petroleum hydrocarbon-affected soil (Figure 3). The proposed soil excavation areas will attain a maximum depth of 8 feet bgs and range in size from approximately 20 feet by 20 feet to approximately 20 feet by 50 feet. Additional soil excavation may be conducted pending results from confirmation sampling (discussed in Section 5.4 below), and based on visual inspection and/or field screening of soil indicating contamination remains in place.

Visual inspection of the soil in the excavations will be used to evaluate the need to expand the excavations vertically (if less than approximately 8 feet bgs) or laterally. Excavations may also be expanded as directed by ACEH or LPFD during field inspections. Excavated soil will be stockpiled for disposal or reuse. Stockpile management is discussed in Section 5.7.

Soil removal will be accomplished using earthmoving equipment, such as backhoes and articulated loaders, etc. A California-licensed General Engineering Contractor will be retained to provide equipment and experienced personnel to conduct excavation work. The personnel will have the appropriate Occupational Safety and Health Administration (OSHA) training for sites with affected soil and groundwater (HAZWOPER). Workers will not enter excavations greater than 4 feet deep without protective systems, such as benching or sloping. Access to the excavations will be limited and strictly monitored. Vehicle and equipment entry to the excavation will be by a ramp or ramps advanced as each excavation progresses, as deemed appropriate by the selected excavation contractor.

Excavation activities will be directed and observed by a Haley & Aldrich representative under the direct supervision of a California Professional Geologist or Professional Engineer.

5.4 Confirmation Sampling Procedures

Confirmation soil samples will be collected to document concentrations (if any) that may remain in place and assess whether excavations must be vertically and/or laterally expanded to remove soil affected by primary COCs.

Sidewall confirmation soil samples will be collected every 20 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Bottom confirmation soil samples will be collected every 400 square feet at the base of the excavation, directly below the area where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. The purpose of these samples is to document concentrations (if any) that may remain in place or to assess whether additional soil will require removal.

Confirmation soil samples will be also be collected from beneath the main conveyor culvert during demolition. Soil samples will be collected at a minimum every 40 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Soil samples will also be collected beneath any joints, seams, or other breaks in the conveyor culvert.



Soil samples will be field-screened with a photoionization detector (PID), a flame ionization detector (FID), or a similar instrument, for the presence of petroleum hydrocarbons and/or volatile organic compounds (VOCs). If there is evidence of other potential contaminants (i.e., odor, staining, discoloration), additional samples will be collected and submitted to the lab for analyses. ACEH will be notified about any additional contamination prior to backfill. Soil samples collected for analysis will be placed directly into clean laboratory supplied glass jars using a hand trowel or similar device. Samples will be labeled with a sample identification number, the time and date of collection, the analysis requested, and the initials of the sampler. The samples will be stored in ice-chilled coolers and submitted to the laboratory under strict chain-of-custody protocols.

Based on the historical use of AOC #1 as a hot mix asphalt plant, all confirmation samples will be submitted to a state-certified laboratory for the analysis of TPHd and TPHmo using EPA test Method 8015B, with silica-gel cleanup (using a 10-gram column cleanup based on EPA test Method 3630C). If necessary, soil samples may be analyzed on a rapid turnaround schedule so that analytical results can be reviewed to assess the need for additional soil excavation while the excavation contractor is at the Site. A subset of the confirmation samples, either two side wall samples or 10% of total shallow soil samples per excavation, will also be analyzed for naphthalene by EPA test Method 8270 Selected Ion Monitoring (SIM).

5.5 Asbestos Containing Material and Lead Based Paint Survey

Prior to any closure activities, an asbestos containing material (ACM) and lead-based paint (LBP) survey will be performed by RGA Environmental. Samples of potentially ACM will be collected from the remaining structures and the insulated piping within the paving oil containment structure (Figure 3). Samples of paint from the remaining structures will also be collected and analyzed to characterize waste streams during demolition. Results of the ACM and LBP survey will be presented in the closure report.

5.6 Backfill

After the excavation has been completed to the necessary depth and/or analytical results from the confirmation soil samples indicate that the excavation has been sufficient to remove soil affected by all primary COCs, the excavation will be backfilled with clean fill to match the current grade. Fill originally proposed for this purpose by ARCADIS is from stockpiles located on-Site. Representative samples will be collected from stockpiled material at a sample rate of one four-point composite soil sample per 250 cubic yards (DTSC 2001). Sample analytical results will be submitted to ACEH and the LPFD for review and approval for use as backfill material. If the stockpiled soil is not suitable for fill then stockpiles of soil previously characterized for use for backfill at Busch Pit, and approved for that purpose by ACEH in a letter dated 28 August 2012, will be imported from elsewhere on the Property (ACEH 2012).

5.7 Soil Stockpiling

Excavated soil affected by COCs will be profiled for disposal at an appropriate landfill. Based on the analytical results of the soil samples collected at the Site to date, excavated soil is expected to be disposed of as Class II or III non-hazardous solid waste at an appropriate disposal facility, in accordance with the facility's waste soil disposal criteria. Once the waste is disposed, signed transportation, storage and disposal facility (TSDF) documents will be obtained and provided in the closure report.

Excavated soil will either be temporarily stockpiled on-site for additional handling, including sampling for waste classification, or loaded directly into trucks and hauled off-site for disposal. If the soil can be



profiled for disposal using the existing data from soil samples already collected at AOC #1 or confirmation soil samples, then the soil could be loaded directly into trucks for transportation off-site.

If the soil is stockpiled it will be placed on plastic sheeting for temporary storage in a suitable location at the Site. Soil stockpiles will be spaced to allow continued Site access as needed. Temporary berms will be constructed around the stockpile area to control runoff draining from the wet soil and/or caused by precipitation. The soil stockpiles will be covered with plastic sheeting at the end of each work day and/or during significant precipitation events. The plastic sheeting will be secured with sandbags or another suitable method.

Stockpiled soil that does not contain primary COCs at concentrations above the proposed cleanup goals can be used as fill for the various excavations at AOC #1.



6. CLOSURE PLAN FOR SURFACE FEATURES

This portion of the closure plan addresses aboveground features at the Site that are planned to be closed and/or removed (identified on Figure 3), including:

- Former conveyor culvert
- Two plastic containers and one tote located east of AOC #1 (not shown on figure)
- Former containment structure
- Former truck scale
- Concrete footings
- Soil pile located in the southern portion of the Site
- Storage shed (and contents) located approximately northeast of the former containment structure
- Concrete former dust collector

A licensed General Engineering Contractor ("Contractor") with a Hazardous Waste Endorsement license in the State of California (A-HAZ license) will be retained to remove the surface features and/or contents as described below. The selected Contractor will provide personnel who have the appropriate OSHA training for sites with affected soil and groundwater (HAZWOPER). Demolition and removal activities will be directed by a Haley & Aldrich representative working under the direct supervision of a California Professional Geologist or Professional Engineer.

If necessary and appropriate, soil excavation activities and confirmation soil sample collection may be conducted beneath surface features, as described in Section 6.

6.1 Former Conveyor Culvert

As discussed in Section 3.1, the underground conveyor culvert was temporarily sealed in 2008 by placing a large amount of soil in front of the entrances. The culvert will be opened by removing the soil blocking its entrances and the backfill overlying the culvert. The corrugated metal structure and contents will be removed. Confirmation soil samples will be collected from beneath the main conveyor culvert during removal. Soil samples will be collected at a minimum every 40 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Soil samples will also be collected beneath any joints, seams, or other breaks in the conveyor culvert. The attached escape tunnel will also be removed. It is anticipated that the items removed from the culvert can be recycled for scrap. The culvert will then be backfilled with clean fill stockpiled on-Site. The final disposition of the contents of the culvert will be presented in the report documenting the implementation of this closure plan.

6.2 Two Plastic Containers and One Tote Located East of AOC #1

During the 2008 Site Walk, two plastic containers and one tote were identified east of AOC #1. The plastic containers were broken and contained rainwater. Based on the labeling of the tote and ARCADIS's conversations with representatives of Hanson, these items appear to have been used to store accelerants that allow concrete to cure faster; they are typical of the concrete industry. To properly dispose of the liquid in the containers (if present) the selected Contractor will profile the contents of the containers. If appropriate and necessary, representative samples of the liquid will be collected for laboratory analyses using EPA Method 8082 for polychlorinated biphenyls (PCBs) and EPA Method 8260 for VOCs. Following testing, the liquid will be removed from the containers and disposed of properly. The empty



containers and tote will be rinsed as necessary, and disposed of properly. Depending on the results of the testing, the liquid will be recycled or disposed of as appropriate. The final disposition of the liquid and the containers will be presented in the report documenting the implementation of this closure plan.

6.3 Former Containment Structure

A concrete containment structure was present at AOC #1 (Figure 3). In 2008, the former containment structure contained the following:

- oily water
- eight 55-gallon drums
- several 5-gallon buckets
- metal piping (some of which is insulated), which has been temporarily stored in the containment area

To properly dispose of the containment structure and its contents, the selected Contractor will field test any liquid (and sludge) present at the base of the structure and the contents of the 55-gallon drums and buckets for PCBs and VOCs, using EPA Methods 8082 and 8260, respectively. Based on the results of the field screening, the liquid will be removed and recycled or disposed of properly. It is anticipated that the oil and oily water will be recycled at an appropriate TSDF.

The insulated piping present within the containment structure will be screened for the presence of ACM. A representative sample of the insulation material will be collected and submitted to a laboratory that has an EPA certification through the National Institute for Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) for analysis using polarized light microscopy (PLM). The samples will be analyzed for ACM using PLM with Dispersion Staining (PLM/DS) in accordance with the EPA "Interim Method for the Determination of Asbestos in Bulk Building Materials as found in 40 CFR, Part 763, subpart F, Appendix A" (EPA/600/R-93/116). Based on the results of this testing, the piping will be disposed of or recycled appropriately. If the analytical results of the insulation material indicate that ACM is present, an ACM abatement plan presenting the procedures to contain and dispose of the ACM will be prepared.

After the oily water, drums, buckets, and piping are removed from the containment structure, the concrete walls and floor of the structure will be removed using earth-moving equipment. Based on the presence of the oily water within the containment structure, the concrete will likely require off-site disposal. It is anticipated that the stained concrete will be disposed of off-site as Class II waste.

Once the concrete structure is removed, the soil beneath the concrete containment structure will be visually observed for the presence of staining. Soil visually observed to be stained by petroleum hydrocarbons will be excavated laterally and/or vertically to a maximum depth of 8 feet bgs and stockpiled on-site following procedures in Section 5.7. Sidewall confirmation soil samples will be collected every 20 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Bottom confirmation soil samples will be collected every 400 square feet at the base of the excavation, directly below the area where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD.

The analytical results for the confirmation samples will be compared to cleanup goals established for this Site in Section 5.1. If the concentration is above the cleanup goals, then additional soil will be removed from where the confirmation sample was collected. Following the completion of the expanded excavation,



additional confirmation samples will be collected.

After the excavation has been completed to the necessary depth (maximum of 8 feet bgs) and/or analytical results from the confirmation soil samples indicate that the excavation has been sufficient to remove soil affected by primary COCs, the excavation will be backfilled with clean fill stockpiled on-Site.

6.4 Former Truck Scale

A partially dismantled truck scale is located at AOC #1 and will be removed from the Site (Figure 3). The scale consists of a concrete structure that extends approximately 4 feet below grade. Prior to removal of the former truck scale from AOC #1, debris or freestanding liquid in the confines of the former truck scale will be removed and handled using similar methods as described for the former containment structure (Section 6.3).

Once the liquid (if present) is removed from the former truck scale, the concrete walls and floor of the former truck scale will be removed using earth-moving equipment. The unaffected-unstained concrete will be recycled. Stained concrete will be transported off-site for disposal as Class II waste. A total of five "weight plates," comprised of concrete and metal, were located on the top of the former truck scale. These weight plates are now located on the western side of the former truck scale and are depicted on Figure 3. The metal will be separated from the concrete of the weight plates and all materials will be transported off-site for recycling.

After the concrete structure of the truck scale is removed, the soil beneath the former truck scale will be visually observed for the presence of staining. Soil visually observed to be stained by oil will be excavated laterally and/or vertically to a maximum depth of 8 feet bgs and stockpiled on-site using procedures provided in Section 5.7. Sidewall confirmation soil samples will be collected every 20 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Bottom confirmation soil samples will be collected every 400 square feet at the base of the excavation, directly below the area where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD.

The analytical results for the confirmation samples will be compared to cleanup goals established for this Site in Section 5.1. If the concentration is above the cleanup goals, then additional soil will be removed from where the confirmation sample was collected. Following the completion of the expanded excavation, additional confirmation samples will be collected.

After the excavation has been completed to the necessary depth (maximum of 8 feet bgs) and/or analytical results from the confirmation soil samples indicate that the excavation has been sufficient to remove soil affected by primary COCs, the excavation will be backfilled with clean fill to match the current grade.

If stained soil is not observed after the structure is removed, confirmation soil samples will be collected and submitted for laboratory analysis. Samples will be collected every 400 square feet within the footprint of the former structure.

6.5 Concrete Footings

A total of nine concrete footings will be removed from AOC #1 (Figure 3). Observations made by ARCADIS during the 2008 Site Walk indicated that these footings were not stained and did not appear affected by previous site activities (ARCADIS 2010a). Therefore, these concrete footings will be broken



up on-site and stockpiled for recycling.

Once each concrete footing is removed, the soil beneath the former footing will be visually observed for the presence of staining. Soil visually observed to be stained by oil will be excavated laterally and/or vertically to a maximum of 8 feet bgs and stockpiled on-site using procedures provided in Section 5.7. Sidewall confirmation soil samples will be collected every 20 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Bottom confirmation soil samples will be collected every 400 square feet at the base of the excavation, directly below the area where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD.

The analytical results for the confirmation samples will be compared to cleanup goals established for this Site in Section 5.1. If the concentration is above the cleanup goals, then additional soil will be removed from where the confirmation sample was collected. Following the completion of the expanded excavation, additional confirmation samples will be collected.

After the excavation has been completed to the necessary depth (maximum of 8 feet bgs) and analytical results from the confirmation soil samples indicate that the excavation has been sufficient to remove soil affected by primary COCs, the excavation will be backfilled with clean fill to match the current grade.

If stained soil is not observed, then confirmation soil samples will be collected and submitted for laboratory analysis. Samples will be collected at the ground surface every 400 square feet within the footprint of the former structure.

6.6 Soil Piles

A soil pile from previous site operations is present at AOC #1 (Figure 3). To assess the quality of the soil in this pile, a four-point composite soil sample will be collected from the pile and analyzed using sample collection procedures and analytical methods provided in Section 5.6.

The analytical results for the composite soil sample will be compared to cleanup goals established for this Site in Section 5.1. If the concentration is above the cleanup goals, then the soil will be transported for off-site disposal as Class II waste. If the analytical results for the composite soil sample are less than the cleanup goals, then the soil will remain on-site and can be used as fill.

6.7 Storage Shed

A storage shed comprised of corrugated metal is present at AOC #1 (Figure 3). The structure and its contents are to be removed. Observations made by ARCADIS during the 2008 Site Walk indicated that the contents of the shed consisted of spare parts for the equipment formerly operated at AOC #1. Based on observations made during the 2008 Site Walk, the majority of the contents of the shed are metal fittings and tools that can be recycled as scrap metal.

6.8 Concrete Former Dust Collector

The concrete walls and floor of the former dust collector (Figure 3) will be removed using earth-moving equipment. It is anticipated that the stained concrete will be disposed of off-site as Class II waste. Clean concrete will be broken up on-site and stockpiled on-Site for future recycling.



The soil beneath the dust collector will be visually observed for the presence of staining. Soil visually observed to be stained by oil will be excavated laterally and/or vertically to a maximum of 8 feet bgs and stockpiled on-site using procedures provided in Section 5.7. Sidewall confirmation soil samples will be collected every 20 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Bottom confirmation soil samples will be collected every 400 square feet at the base of the excavation, directly below the area where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD.

The analytical results for the confirmation samples will be compared to cleanup goals established for this Site in Section 5.1. If the concentration is above the cleanup goals, then additional soil will be removed from where the confirmation sample was collected. Following the completion of the expanded excavation, additional confirmation samples will be collected.

After the excavation has been completed to the necessary depth (maximum 8 feet bgs) and analytical results from the confirmation soil samples indicate that the excavation has been sufficient to remove soil affected by primary COCs, the excavation will be backfilled with clean fill to match the current grade.

If stained soil is not observed, then confirmation soil samples will be collected and submitted for laboratory analysis. Samples will be collected at the ground surface every 400 square feet within the footprint of the former structure.

6.9 Miscellaneous Debris

Observations made during the 2008 Site Walk indicated that miscellaneous debris is located throughout AOC #1. This debris consists of broken pieces of concrete, metal pipes, tools, and mechanical equipment that were previously used as part of the hot mix asphalt plant. These items are to be removed from AOC #1 as part of this closure plan. It is anticipated that these items can be recycled for scrap and that the concrete can be recycled.

Soil visually stained by oil will be excavated laterally and/or vertically to a maximum of 8 feet bgs and stockpiled on-site using procedures provided in Section 5.7. Sidewall confirmation soil samples will be collected every 20 linear feet from the depth where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD. Bottom confirmation soil samples will be collected every 400 square feet at the base of the excavation, directly below the area where the highest degree of staining or odor was observed during excavation, or as directed during field inspection by ACEH or LPFD.

The analytical results for the confirmation samples will be compared to cleanup goals established for this Site in Section 5.1. If the concentration is above the cleanup goals, then additional soil will be removed from where the confirmation sample was collected. Following the completion of the expanded excavation, additional confirmation samples will be collected.

After the excavation has been completed to the necessary depth (maximum of 8 feet bgs) and analytical results from the confirmation soil samples indicate that the excavation has been sufficient to remove soil affected by primary COCs, the excavation will be backfilled with clean fill to match the current grade.

If stained soil is not observed following the removal of the debris, then confirmation soil samples will not be collected and submitted for laboratory analysis.



6.10 Monitoring Well Abandonment

Groundwater monitoring wells, MW-1 through MW-10, located within AOC #1 (Figure 3) will be abandoned once case closure has been received, as requested by ACEH (ACEH 2009). Well destruction activities will not proceed without ACEH's approval of abandonment. The appropriate permit will be submitted to the Zone 7 Water Agency (Zone 7) 5 business days prior to the start of work.

Groundwater monitoring well abandonment will be conducted in accordance with the California Department of Water Resources Bulletin 74-90 California Well Standards (Cal DWR 1991).



7. SITE CLOSURE SCHEDULE

We estimate that the scope of work of this revised closure plan will be completed within approximately 5 months following the approval of the plan by LPFD and ACEH. The report documenting the closure activities will be submitted to the LPFD and ACEH approximately 1 month after the closure activities are completed.



8. REPORTING

Haley & Aldrich will prepare a report under the direct supervision of a California Professional Geologist or Professional Engineer, summarizing the closure activities conducted at the Site for submittal to ACEH and LPFD, which will include the following:

- field observations made at the time of all field activities;
- the volume and disposition of soil removed from the Site;
- the volume and disposition of material that was recycled and disposed of;
- **a** summary of the analytical results of the confirmation soil samples;
- field forms;
- chain-of-custody forms and certified laboratory analytical reports;
- copies of all manifests generated as a result of this work.



REFERENCES

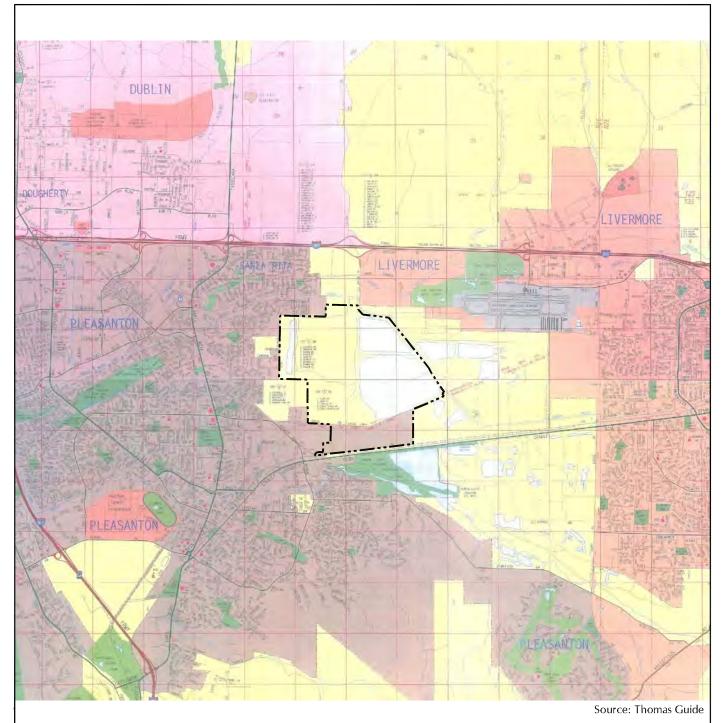
- Alameda County Environmental Health (ACEH). 2008a. Letter from Jerry Wickham to Lee Cover of Hanson Aggregates West Region, re: SLIC Case RO0002941 and Geotracker Global ID STL19719376, Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566. 31 March.
- 2. ACEH. 2008b. Letter from Jerry Wickham to Lee Cover of Hanson Aggregates West Region, re: SLIC Case RO0002941 and Geotracker Global ID STL19719376, Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566. 18 April.
- 3. ACEH. 2009. Letter from Jerry Wickham to Lee Cover of Lehigh Hanson West Region and Steve Dunn of Legacy Partners, re: SLIC Case RO0002941 and Geotracker Global ID STL19719376, Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566. 16 July.
- ACEH. 2010. Letter from Jerry Wickham to Lee Cover of Lehigh Hanson West Region and Steve Dunn of Legacy Partners, re: SLIC Case RO0002941 and Geotracker Global ID STL19719376, Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566 – Conditional Work Plan Approval for AOC #1. 6 April.
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- 8. Baseline Environmental Consulting (Baseline). 2005. Closure Plan/Report, Radum Plant, Hanson Aggregates Mid-Pacific, Inc., 3000 Busch Road, Pleasanton. 28 January.
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- 11. Haley & Aldrich, Inc (Haley & Aldrich). 2010. Notice of Change of Ownership and Request for Time Extension to Execute Closure Plan for Hanson Aggregates Radum Facility, 3000 Busch Road, Pleaanton, California. August 6.
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- 15. LFR. 2008b. Work Plan for the Excavation of Petroleum Hydrocarbon-Affected Soil at the Former Hot Mix Asphalt Plant Area (AOC #1) of the Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California, SLIC Case #RO0002941 and GeoTracker ID SLT19719376. 21 March.
- 16. LFR. 2009c. Closure Plan for the Former Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California (ACEH Case #RO0002941 and Geotracker Global ID # SLT19719376). 19 June.
- 17. Regional Water Quality Control Board, San Francisco Bay Region (RWQCB). 2008. Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater (Interim Final November 2007; Revised May 2008); Environmental Screening Levels ("ESLs"). Technical Document. May.
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- 19. Zone 7 Water Agency, Alameda County Flood Control and Water Conservation District (Zone 7). 1998. Groundwater Protection Ordinance Permit Application; Permit No. 98024 for location number 3A/1E 15F4. 24 February.

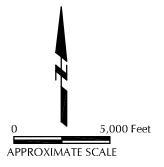






EXPLANATION

--- Approximate Property Boundary



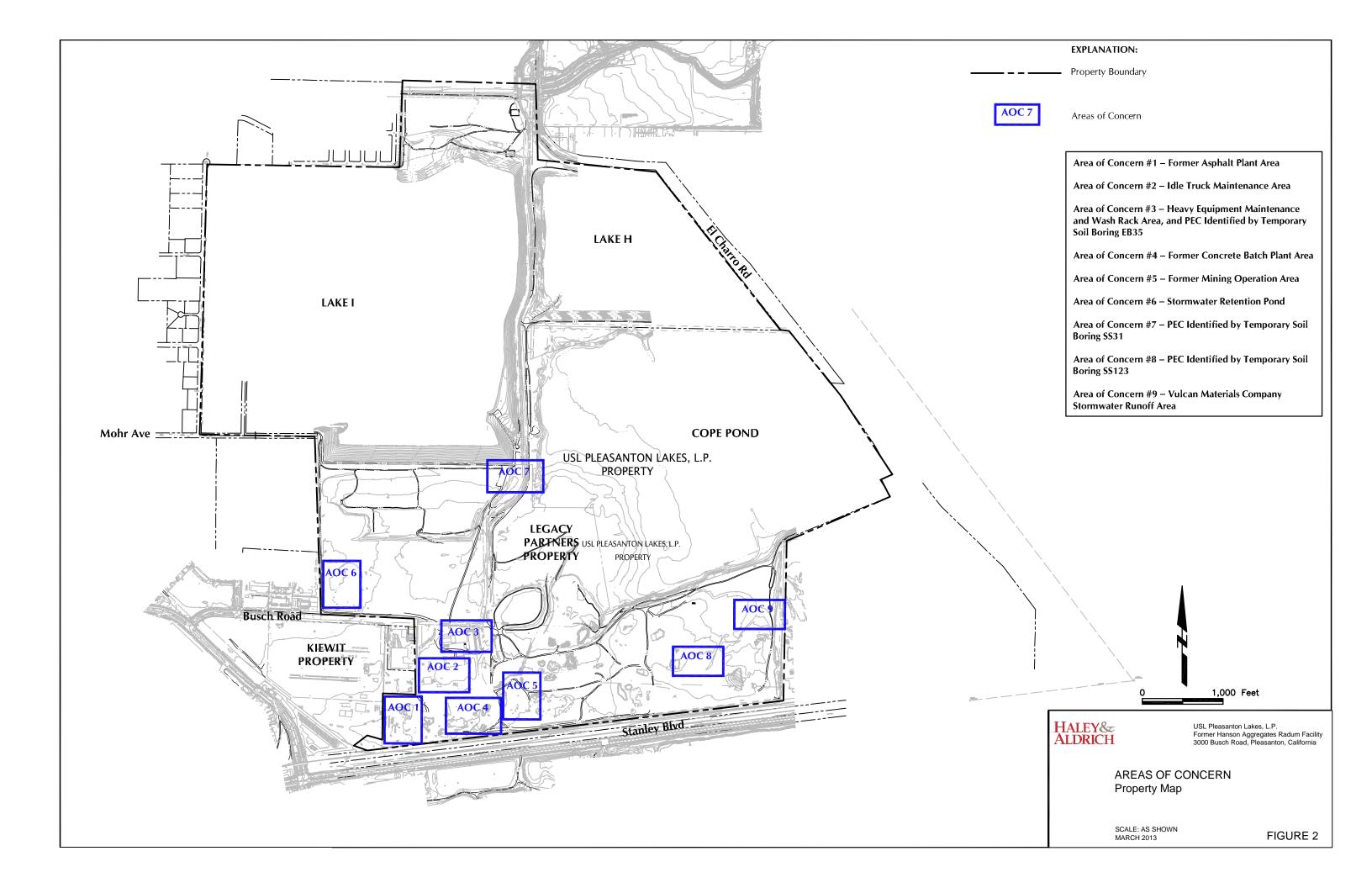


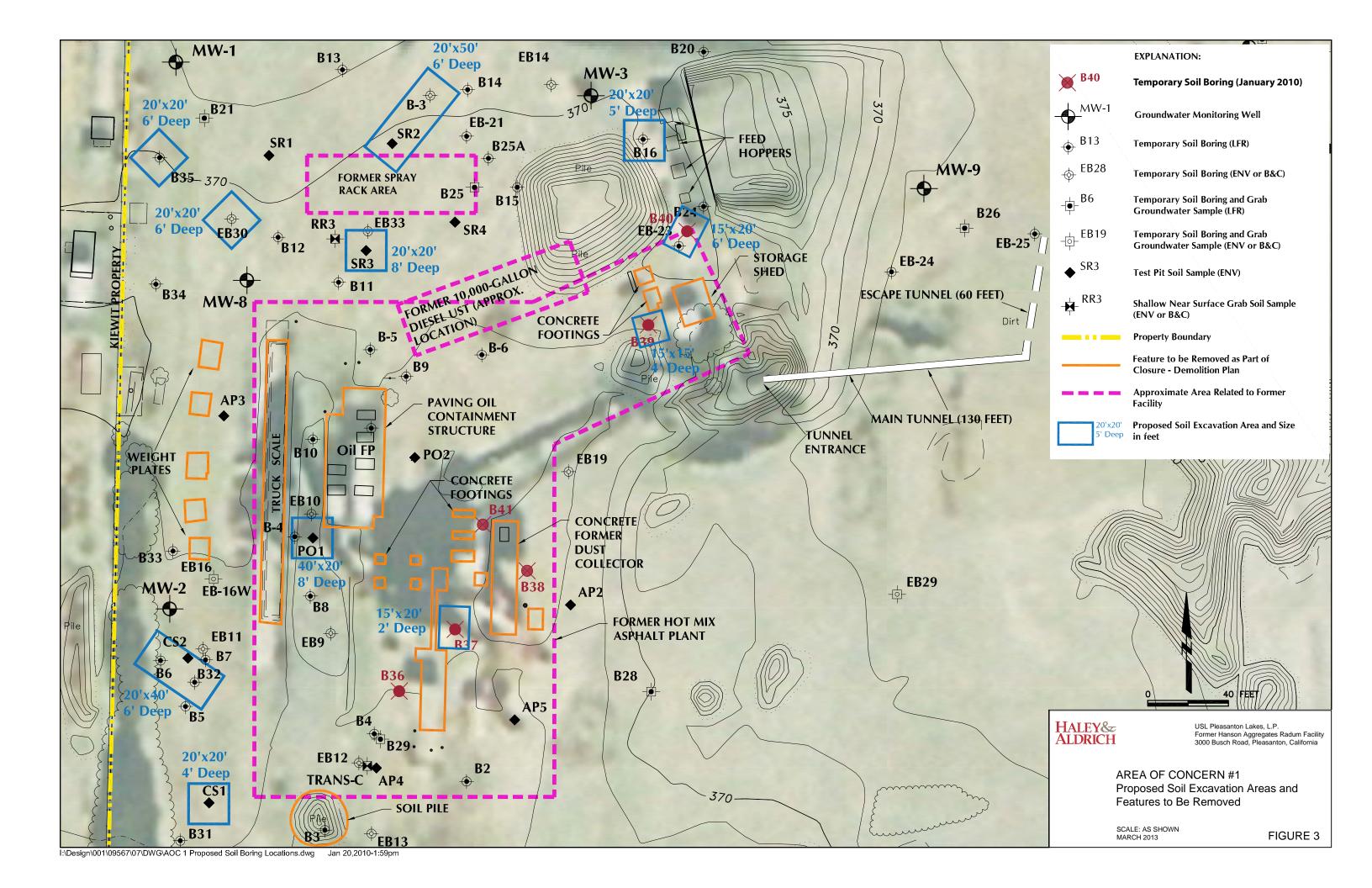
USL Pleasanton Lakes, L.P. Former Hanson Aggregates Radum Facility 3000 Busch Road, Pleasanton, California

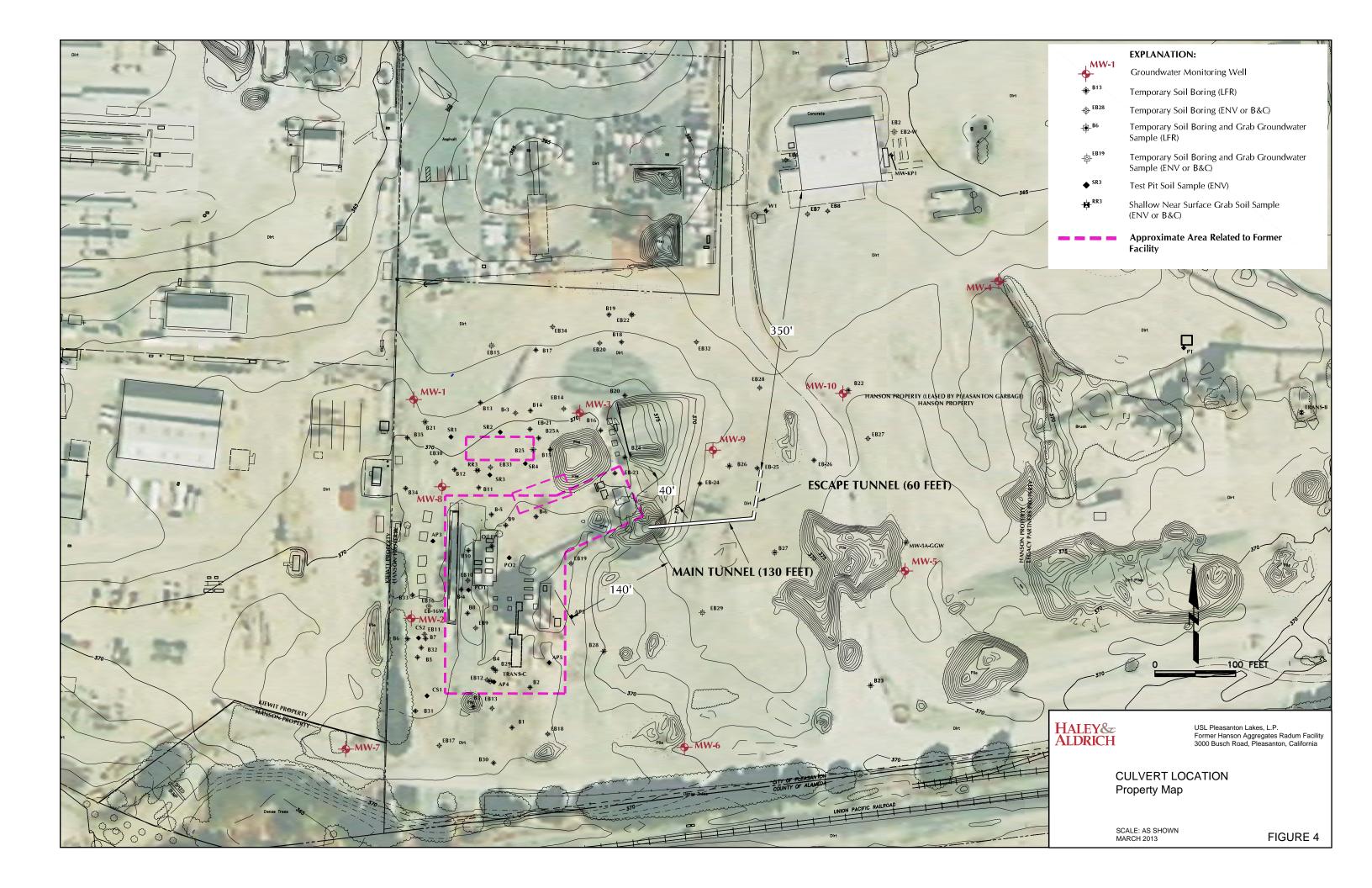
PROPERTY LOCATION

SCALE: AS SHOWN MARCH 2013

FIGURE 1







APPENDIX A

Photo Log

(LFR Appendix A)



Eastern Entrance to Conveyor Tunnel



Eastern Conveyor Entrance Post Abandonment





Eastern Conveyor Entrance Post Abandonment



Western Conveyor Entrance Pre-Abandonment





Inside Conveyor Tunnel



Inside Conveyor Tunnel





Inside Conveyor Tunnel



Western Conveyor Entrance During Abandonment





Western Conveyor Entrance Post Abandonment 1



Containment Structure





Piping in Containment Structure



Drums in Containment Structure 1





Former Truck Scale



Contents of Storage Shed

Client Name/Site Location

Figure Number





Plastic Containers



Plastic Tote



APPENDIX B

NRC Report: Inspection and Sealing of the Underground Conveyor Culvert

(LFR Appendix B)



1605 Ferry Point Alameda, CA 94501 Phone: (510) 749-1390 Fax: (510) 749-4150 www.nrces.com

Emergency Response I-800-33-SPILL (77455)

12/08/08

Hanson Aggregates West Region 3000 Busch Road Pleasanton, Ca 94566-8403

Attention: Lee W. Cover / Environmental Manager

Re: Conveyer Tunnel Structure(s) NRCES Inspection Summary 12/08/08 – Radum Facility Pleasanton, Ca USA

Mr. Cover,

On the above date and location NRC Environmental Services Inc. (NRCES) was contracted to perform inspection services for possible human transient occupation of your out of service conveyer structure tunnel and escape tunnel(s). NRCES mobilized a confined space crew of (3) with the necessary and required personal protective equipment required to perform permit-required confined space entry operations. NRCES personnel inspected the main tunnel which had a distance length of 130'linear feet before encountering a solid wall structure inside tunnel constructed of concrete material and wood. In addition to this inspection, an escape corrugated tunnel measuring 60' linear feet was inspected with a similar wall structure composition. During the inspection NRCES personnel encountered no signs of human transient occupancy inside tunnel structures.

Respectfully Submitted,

Carlos Sanchez

Emergency Response Manager-NORCAL Region

NRCES Alameda Ca USA



PLEASE REMIT CHECK PAYMENT TO: NRC Environmental Services Inc. Box#2886 P.O. Box 8500 Philadelphia, PA 19178-2886

1605 Ferry Point Alameda, CA 94501 Phone: (510) 749-1390 Fax: (510) 749-4150 www.nrces.com

PLEASE REMIT ACH PAYMENT TO: NRC Environmental Services Inc.

Bank of New York ABA# 021-000-018 A/C# 56100110015632001 A/C Name: N.R.C.E.S Emergency Response I-800-33-SPILL (77455)

T			Invoice #	533686
Invoice Date:	December 12, 2008		NRCES Job #	39202
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Customer:	Hanson Aggregates		Comton	
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	Pleasanton, CA 94566-8403		Phone:	
	1 reason to 1, 071 94300-0403	·····	Fax:	
			Terms:	Net 30 Days
Job Description:	Provide service to inspect conveyer tunnel for inhabitants			
Job Location:	Pleasanton, CA		Job Date (s):	12/8/2008
			Progress Billing:	No
			Final Billing:	Yes
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			Direct Phone	(510) 749-4138

FED ID #: 91-1572532

A 1.5% per month finance charge will be assessed for all past due invoices to include the flat late fee amount. CC: ACCOUNTING

Fax

(510) 749-4150

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Project Manager's Approval

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700	2	EA	2 WAY RADIOS
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NRC REPRESENTATIVE SIGNATURE	

PRINTED NAME/TITLE

2

COSTOMER REPRESENTATIVE SIGNATURE