

202941



October 26, 2009

Mr. Jerry Wickham  
 Alameda County Health Care Services  
 Environmental Health Services  
 1131 Harbor Bay Parkway, Suite 250  
 Alameda, California 94502-6577

Alameda County

OCT 29 2009

Environmental Health

Mr. John Rigter  
 Livermore-Pleasanton Fire Department  
 3560 Nevada Street  
 Pleasanton, CA 94566

**Subject: Receipt of ACEH's October 14, 2009 Comment Letter on Closure Plan for the Former Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California (ACEH Case #RO0002941 and Geotracker Global ID #SLT19719376)**

Dear Mr. Wickham and Mr. Rigter;

Hanson Aggregates (Hanson) would like to take this opportunity to acknowledge receipt of Alameda County Environmental Health's (ACEH) October 14, 2009 technical comment letter on the Livermore-Pleasanton Fire Dept.'s (LPPD) September 25, 2009 comment letter on the Closure Plan dated June 19, 2009 for the former hot mix asphalt plant area (AOC#1), the idle truck maintenance area (AOC#2), and the heavy equipment maintenance and wash rack area (AOC#3) at the former Hanson Aggregates Radum Facility located at 3000 Busch Road, Pleasanton, California. Both letters are enclosed for your reference.

ACEH's comment letter requires a Revised Closure Plan to be submitted to both the County and the LPPD on or by December 1, 2009. Hanson fully intends to comply with this requirement. Technical Comments No. 3 Closure of Wash Rack, No. 4 Closure of Underground Lubricant Piping, and No. 6 Hazardous Materials Storage for the Area East of AOC#3, require submittal of work plans for soil sampling and analysis. Please be advised that closure requirements for AOC#2 and AOC#3 are the responsibility of Legacy Partners, and Hanson will comment as such to that effect in the Revised Closure Plan.

If you have any questions or comments as it pertains to the above, please contact me at (925) 244-6584.

Sincerely,

Lee W. Cover  
 Environmental Manager  
 Hanson Aggregates Northern California

Receipt of ACEH's October 14, 2009 Comment Letter on Closure Plan for the Former Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California (ACEH Case #RO0002941 and Geotracker Global ID #SLT19719376)

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Attachment: Livermore-Pleasanton Fire Dept. Comment Letter dated Sept. 25, 2009  
Alameda County Environmental Health Comment Letter dated Oct. 14, 2009

cc: Steve Dunn, Legacy Partners  
Bridget Metz, Legacy Partners  
Voytek Bajsarowicz, ENV America  
Terry Marshall, Lehigh Hanson  
Jim Wallmann, Lehigh Hanson  
Bill Butler, Hanson Aggregates  
Katrin Schliewen, LFR

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY  
ALEX BRISCOE, Acting Director



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

October 14, 2009

Mr. Lee Cover  
Lehigh Hanson West Region  
12667 Alcosta Blvd., Suite 400  
San Ramon, CA 94583

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

Subject: SLIC Case RO0002941 and Geotracker Global ID SLT19719376, 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 review comments on the Facility Closure Plan provided by Livermore-Pleasanton Fire Department (LFPD) in correspondence dated September 25, 2009 (attached). For consistency, we have listed each of the comments and required amendments in the LFPD correspondence dated September 25, 2009 in numerical order and provided either concurrence, clarification with regard to ACEH requirements, or additional technical comments. We request that you address the technical comments in the September 25, 2009 in a Revised Closure Plan **no later than December 1, 2009**. The Revised Closure Plan is to be submitted to both the Livermore-Pleasanton Fire Department and ACEH for review.

In previous correspondence dated January 29, 2009, ACEH conditionally approved additional site characterization activities to conduct additional soil characterization in the vicinity of those structures that will remain in place in Area of Concern (AOC) #1. The additional characterization was proposed by Lehigh Hanson in the documents entitled, "Work Plan for Additional Site Characterization at Selected Areas within AOC #1, Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California, SLIC RO0002952, and Geotracker Global ID SL0600101555," dated September 15, 2008 and the "Response to Alameda County Environmental Health Request for Additional information for AOC #1 at the Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California," dated December 5, 2008. Both documents were prepared on behalf of Lehigh Hanson by LFR Environmental Management & Consulting Engineering. Given that it was considered cost effective to conduct the proposed additional characterization with soil sampling and excavation to be conducted as part of facility closure requirements, the schedule for implementation of the proposed additional characterization in AOC#1 was made contingent upon the schedule for implementation of the facility closure requirements as directed by LFPD. Since the facility closure requirements are now defined, we request that you implement the additional site characterization activities in AOC#1 and present the results in a report **no later than February 13, 2010**. The Additional Site Characterization Report for AOC#1 is to be submitted to both the Livermore-Pleasanton Fire Department and ACEH for review.

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

### **TECHNICAL COMMENTS**

1. **Analytical Methods to Confirm Field Testing Results.** In the Revised Closure Plan requested below, please address technical comment 1 in the LPFD correspondence dated September 25, 2009. No further clarification is required.
2. **Proposed Land Use.** In the Revised Closure Plan requested below, please address technical comment 2 in the LPFD correspondence dated September 25, 2009. Sampling results are to be initially screened against San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (Revised May 2008), which are specific to the proposed land use. We note that cleanup goals were previously proposed and approved for TPH in AOC#1 based upon commercial land use where groundwater is a current or potential source of drinking water. A deed restriction will be required to limit future land use to commercial and industrial land use for AOC#1.
3. **Closure of Wash Rack.** We concur with the request for amendments to the Closure Plan requested by LPFD. In the Revised Closure Plan requested below, please include plans for soil sampling and analyses for the area adjacent to the sump chamber(s) and associated piping.
4. **Closure of Underground Lubricant Piping.** We concur with the request for amendments to the Closure Plan requested by LPFD. In the Revised Closure Plan requested below, please include plans for soil sampling and analyses for the area adjacent to the underground lubricant piping.
5. **Underground Conveyor Culvert.** In the Revised Closure Plan requested below, please provide the information requested in technical comment 5 in the LPFD correspondence dated September 25, 2009.
6. **Hazardous Materials Storage for the Area East of AOC#3.** In the Revised Closure Plan requested below, please provide the information requested in technical comment 5 in the LPFD correspondence dated September 25, 2009.
7. **Disposal Documentation.** In a Final Closure Report, please address technical comment 7 in the LPFD correspondence dated September 25, 2009. No further clarification is required.

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Mr. Steven Dunn  
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### TECHNICAL REPORT REQUEST

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

- **December 1, 2009** – Revised Closure Plan
- **February 13, 2010** – Additional Site Characterization Results for AOC#1

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 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 case.

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**PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

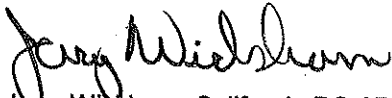
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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 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 send me an electronic mail message 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

Attachment: Livermore-Pleasanton Fire Department Correspondence dated September 25, 2009

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway  
Livermore, CA 94551

Colleen Winey, 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

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John Rigter, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566

Bridget Metz, Legacy Partners, 4000 East Third Avenue, Suite 600  
Foster City, CA 94404-4805

Ron Goloubow, 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

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
Geotracker, File



September 25, 2009

Lee W. Cover  
Hanson Aggregates Northern California  
12667 Alcosta Blvd, Suite 400  
San Ramon, CA 94583

RE: Review and Comments of the Facility Closure Plan for Hanson Aggregates Radium Facility, 3000 Busch Road, Pleasanton California

Mr. Cover:

The Livermore-Pleasanton Fire Department has reviewed the Facility Closure Plan prepared by LFR Inc. for the above mentioned facility. The Closure Plan and supporting documentation address Areas of Concern Numbers 1 through 3. Thank you for submitting this hazardous materials closure plan, our comments and required amendments to the plan follow.

1. In Section 4.1, 4.2, and 4.3, you state that containers, containment structures and contents will be field tested (liquid and sludge) for polychlorinated biphenyls (PCBs) and chlorinated volatile organic compounds (VOC's). What specific laboratory analytical methods will be used to confirm the field testing results?
2. What is the current proposed land use for each of the areas of concern? This will determine the required below grade cleanup levels, sample locations, and analytical methods to be used at the site. To a large extent, Livermore-Pleasanton Fire Department (LPFD) will defer to Alameda County Health Care Services for this part of the closure process.
3. Closure of the wash rack sump and related piping has not been adequately addressed. The wash rack system needs to be removed. The closure plan needs to be amended to include the following:
  - Provide wash rack configuration; chamber(s) and location of drainage piping (to outfall) on the site map.
  - Submit a cleaning, removal, waste sampling and disposal plan. Currently sump contains liquid and sludge. Wash rack sump chamber(s) and associated drainage piping need to be clean and empty prior to demolition and removal.
  - Submit a soil sampling and analytical plan for the area adjacent to the sump chamber(s) and associated piping.

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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



- Submit a soil sampling and analytical plan for the area adjacent to the sump chamber(s) and associated piping.
4. Closure of the underground lubricant piping between the shed and warehouse/shop building has not been adequately addressed. The piping needs to be removed. The closure plan needs to be amended to include the following:
    - Provide system details; piping material, size and last known contents, and locate on the site map.
    - Submit a cleaning, removal and disposal plan describing the methods that will be used.
    - Submit a soil sampling and analytical plan for the area adjacent to the piping.
  5. Since the underground conveyer culvert discussed in Section 4.8 has not been removed (currently blocked at the entrances); this underground structure needs to be clearly located at the site. Please provide a site map that includes distances from known points of reference to this structure. In addition, ensure hazard signage is in-place. Current and future owners must be notified.
  6. To-date, very little hazardous materials storage and use information has been provided for the area east of AOC 3. This area contained main electrical switching and transformer equipment, part of the overhead conveyer system, and various buildings and structures (see attached aerial photograph). During our inspection of September 16, 2004, this was one of the areas visited by Larry Appleton and myself. Many of the structures were in the process of being torn down, and the area was being graded with heavy equipment. One of my concerns (among others) was the large electrical transformer units containing regulated levels of PCB's. Please see the attached copy of the inspection report and the concerns raised. These need to be addressed.

Provide additional information for this area including building locations, uses, hazardous materials storage and use (including quantities), and closure activities conducted to-date. In addition, provide sampling results (soil, material, waste, etc.) and disposal documentation.


7. In the final Closure report, provide disposal documentation for all hazardous materials and wastes handled during this facility closure. Please ensure the document copies can be read, and the signed TSDf copies of the manifests are included.

Per our previous conversations, and included in the LPPD facility closure information documents provided, our plan review and inspection time for hazardous materials facility closure is billed at \$127.00/hour. You will receive a separate bill for the time incurred to-date.

Please continue to submit the Facility Closure Plan and related comments to both Livermore-Pleasanton Fire Department and Alameda County Health Care Services.

If you have any questions, I can be reached directly at (925) 454-2337. We appreciate your commitment to this closure process, and thank you for your patience and cooperation in this matter.

Sincerely,



John Rigter  
Hazardous Materials Inspector

Cc: Jerry Wickham, Alameda County Health Care Services  
Bridget Metz, Legacy Partners

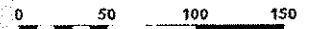
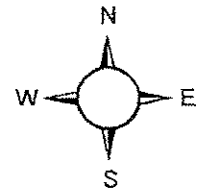


Notification Plot

City of Pleasanton

GIS

Department



Scale 1 in = 100 ft



LIVERMORE-PLEASANTON FIRE DEPARTMENT

INSPECTION REPORT  
NARRATIVE

Name of Facility: <u>HANSON AGGREGATES</u>	Address: <u>3000 BUSCH ROAD, PL</u>
Inspector: <u>JOHN RISTER</u>	

INSPECTION/VISIT INCLUDED BRIEF WALKTHROUGH OF VARIOUS AREAS OF THE FACILITY INCLUDING:

- EQUIPMENT MAINTENANCE SHOP, RUBBISH STORAGE, AND OIL STORAGE AREA.
- DEMOLITION AREAS IN THE MAIN PLANT, AND ELECTRICAL SUBSTATION AREA.

REQUIREMENTS GOING FORWARD:

- ① SUBMIT CURRENT HAZARDOUS MATERIALS BUSINESS PLAN (HMBP) FOR THE FACILITY
- ② SUBMIT FACILITY CLOSURE PLAN FOR ALL PLANT AREAS WHERE HAZARDOUS MATERIALS AND WASTE WERE STORED/DISPOSED/USED.

NOTE: CLOSURE ACTIVITIES CONDUCTED TO-DATE (HAVE ACCORDING TO LARRY APPLETON) INCLUDED OIL AND GRAZE STORAGE AND USE AREAS, ~~AND~~ ELECTRICAL TRANSFORMER AREAS (SOME WITH PCB'S ABOVE SIXTY REGULATED UNITS), AND LEAD/ASBESTOS PAINT AND MASTIC REMOVAL IN THE MAIN PLANT AREA.

- BUNKER HMBP DOCUMENT PROVIDED (BY MAIL)
- FIRE CODE CLOSURE DOCUMENT TO BE PROVIDED BY EMAIL (LARRY.APPLETON@HANSONAMERICA.COM)

<u>Lawrence W Appleton</u>	LAWRENCE W APPLETON	9/16/04
Received by: Signature of Facility Representative	Printed Name	Date of Inspection