

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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January 11, 2008

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

Subject: SLIC Case RO0002941 and Geotracker Global ID SLT19719376, Hanson Aggregates Radium Plant, 3000 Busch Road, Pleasanton, CA 94566

Dear Mr. Cover:

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, "Additional Site Investigation Report for the Former Hot Mix Asphalt Plant Area (AOC #1) ACEH Case #RO0002941 and Geotracker Global ID SLT19719376, Hanson Aggregates Radium Facility, 3000 Busch Road, Pleasanton, Alameda County, California," dated December 21, 2007 and prepared by LFR Inc. The Site Investigation Report presents results from 12 soil borings and 7 monitoring wells advanced in the former hot mix asphalt plant area in October 2007.

The Site Investigation report concludes that the primary chemicals of concern detected in soil and groundwater at the site are TPH as diesel and to a lesser extent, TPH as motor oil. The Site Investigation Report also concludes that the Former Hot Mix Asphalt Plant Area (AOC #1) has been sufficiently characterized. Additional subsurface investigations at the site are not recommended but the report does recommend initiation of a groundwater monitoring program.

We generally concur with the conclusions in the Site Investigation Report and are not requesting further soil sampling or grab groundwater sampling to further define the extent of contamination at this time. However, as discussed in technical comment 3, we are requesting that the groundwater monitoring network be expanded to address contamination detected in grab groundwater samples and to evaluate groundwater quality in the more immediate area of petroleum-impacted soils. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Southern Portion of the Former Asphalt Plant and Area West of the Former Spray Rack Area.** Based on the data and evaluation presented in the Site Investigation Report, no further investigation of the southern portion of the former asphalt plant or area west of the former spray rack area is requested at this time.

2. **Deep Soil Contamination.** We concur with the conclusion that the viscous free-phase petroleum product described in the subsurface between depths of approximately 32 and 40 feet bgs is not likely associated with discharges from the former pavement containment structure. The source of this free-phase product is unknown but the product may have been emplaced during former mining operations. Based on the results presented in the Site Investigation Report, no additional soil borings or grab groundwater sampling are requested to further characterize the deep soil contamination at this time. However, as discussed in technical comment 3, we request that an additional monitoring well be installed in the area of boring B-26 to confirm that impacts to groundwater are minimal in this area of the site.

3. **Monitoring Well Installation and Monitoring.** We concur with the recommendation to conduct groundwater monitoring on a quarterly basis for approximately one year. As previously discussed in our June 22, 2007 correspondence, the existing monitoring wells are generally located upgradient or outside the areas of suspected or known soil contamination (with the exceptions of monitoring wells MW-2 and MW-3). We request that you supplement the existing groundwater monitoring well network with three additional groundwater monitoring wells to evaluate groundwater quality in areas where groundwater contamination has been detected in grab groundwater samples or areas where extensive soil contamination exists. We request that one groundwater monitoring well be installed downgradient (northwest) of boring B-22 to evaluate the detection of 1,700 micrograms per liter ($\mu\text{g/L}$) of TPH as diesel in a grab groundwater sample collected from boring B-22. We request that one monitoring well be installed downgradient of boring B-26 to confirm that petroleum hydrocarbons and 2-methylnaphtalenee detected in soil between 30 and 40 feet bgs are not migrating to groundwater and to confirm that elevated concentrations of metals are not present in groundwater in the area of boring B-26. We request that a monitoring well be installed near the north end of the truck scale to evaluate groundwater quality immediately downgradient from the hot mix asphalt plant. Please present plans for monitoring well installation and identify the wells and analyses for quarterly groundwater monitoring in the Well Installation and Groundwater Monitoring Work Plan requested below.

4. **Soil Cleanup in Former Hot Mix Asphalt Plant Area.** Removal of TPH-impacted soil and replacement with clean fill will be required in several areas of the former asphalt plant and spray rack area. Further definition of the extent of shallow TPH-impacted soils and confirmation soil sampling is to be conducted during soil removal in the areas requiring cleanup. Please submit a Work Plan for soil excavation and removal **by March 21, 2008.**

5. **Deviation from Technical Comments.** The technical comments in our June 22, 2007 correspondence requested that the soil boring for well MW-7 be visually logged continuously in the field for soil type, color, moisture content, odor, and other observed features and screened with a photoionization detector. The technical comments also requested that soil samples be collected for laboratory analysis at any interval where visible staining, odor, or elevated PID readings was observed or if no visible soil staining, odor, or elevated PID readings was observed, that soil samples be collected at a minimum of five foot intervals to a depth of 30 feet bgs and at 10-foot intervals from 30 to 60 feet bgs. The soil samples were to be analyzed for TPH as diesel and TPH as motor oil using EPA Method 8015M. Soils in the MW-4 boring were apparently logged at 5-foot intervals and no soil samples were collected for laboratory analyses. Screening results did not detect

significant contamination in the soil boring. Based on the soil screening results and groundwater sampling results for well MW-7, we are not requiring that you advance an additional boring to obtain soil samples for laboratory analyses at this time.

TECHNICAL REPORT REQUEST

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

- **February 28, 2008** – Well Installation and Groundwater Monitoring Work Plan
- **March 21, 2008** – Work Plan for Soil Removal and Excavation

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this case.

Mr. Lee Cover
RO0002941
January 11, 2008
Page 4

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

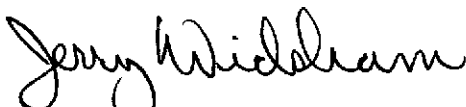
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For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

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
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

Colleen Winey, QIC 80201
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Danielle Stefani
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Mr. Lee Cover
RO0002941
January 11, 2008
Page 5

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