

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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Alameda, CA 94502-6577  
(510) 567-6700  
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July 29, 2008

Mr. Lee Cover  
Hanson Aggregates  
3000 Busch Road  
Pleasanton, CA 94566-8403

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

Subject: SLIC Cases RO0002941 (Geotracker Global ID SLT19719376) and RO0002952 (Geotracker Global ID SL0600101555), Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566

Dear Mr. Cover and Mr. Dunn:

The purpose of this correspondence is to document agreements reached during a meeting on July 2, 2008 regarding a deed restriction and cleanup goals for AOC #1. This correspondence also discusses results from site inspections of AOC #1 and AOC #3 conducted on July 18, 2008. The July 2 meeting discussions and July 18 site inspection are summarized separately in the itemized technical comments below. Since these items are relevant to both ACEH cases RO2941 and RO2952, the correspondence is addressed to responsible parties for both cases and will be included in both case files,

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

**SUMMARY OF JULY 2, 2008 MEETING**

- 1. Meeting Purpose and Attendees.** On July 2, 2008, Jerry Wickham of ACEH met with Lee Cover, Terry Marshall, and Marvin Howell of Hanson Aggregates, Brian Myers of Nuquest Ventures, and Ron Goloubow of Levine Fricke to discuss the cleanup goal for TPH as motor oil in soil for AOC #1.
- 2. Deed Restriction.** During the July 2, 2008 meeting, the development of a deed restriction to limit future land use for Area of Concern 1 (AOC #1) was discussed. The use of a deed restriction to limit potential future land use for AOC #1 to commercial and industrial land use is acceptable to ACEH. ACEH agreed to provide a copy of a model deed restriction following the meeting. A copy of a model deed restriction was subsequently provided to Lee Cover and Marvin Howell of Hanson Aggregates and Brian Myers of Nuquest Ventures in a July 3, 2008 electronic mail message.

3. **Proposed Cleanup Level for TPH as Motor Oil in Soil.** Provided that a deed restriction that is acceptable to ACEH is implemented to limit potential future land use, the cleanup level of 2,500 milligrams per kilogram (mg/kg) for TPH as motor oil in shallow soil that was proposed in the "*Work Plan for the Excavation of Petroleum-Affected Soil at the Former Hot Mix Asphalt Plant Area (AOC #1) of the Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California,*" dated March 21, 2008, will be acceptable. However, shallow soil with visible staining, odor, or other characteristics that potentially represents a nuisance for future site use, is to be removed and properly disposed even if the concentration of TPH as motor oil is less than the proposed cleanup level of 2,500 mg/kg.
4. **Inspection and Screening of Soils.** Based upon soil sampling results, approximate areas of excavation were proposed in the "*Work Plan for the Excavation of Petroleum-Affected Soil at the Former Hot Mix Asphalt Plant Area (AOC #1) of the Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California,*" dated March 21, 2008. In addition to excavation based upon the soil sampling results, visibly stained and odorous soil is to be excavated prior to collection of confirmation soil samples if staining, odor, or elevated PID readings are observed in soil beneath the former structures. Inspection and screening of soils below surface structures is required following removal of surface structures to identify areas for excavation. Mr. Lee Cover of Hanson Aggregates indicated that several surface structures will remain in place. Mr. Cover also indicated that Hanson Aggregates is in the process of finalizing a scope of work for the AOC #1 excavation. Prior to finalizing the scope of the proposed excavation, Jerry Wickham agreed to inspect AOC #1 in order to identify any additional areas that may require sampling or excavation. Mr. Wickham requested that the site inspection be coordinated with an inspection by Livermore-Pleasanton Fire Department related to facility closure. The site visit was tentatively planned for July 9, 2008 but was later postponed to July 18, 2008.
5. **Schedule Extension.** A schedule extension for submittal of the Former Hot Mix Asphalt Plant (AOC #1) Excavation Report from August 29, 2008 to October 23, 2008 was discussed. However, based upon the results of the site inspection for AOC1 discussed below, preparation of a Work Plan for Soil Sampling is requested prior to implementation of soil excavation in AOC #1.

#### JULY 18, 2008 SITE INSPECTIONS

6. **Site Inspections.** On July 18, 2008, the Heavy Maintenance Shop area adjacent to the Hanson office in AOC #3 was inspected by Mr. John Rigter of the Livermore-Pleasanton Fire Department. Lee Cover of Hanson Aggregates, Ron Goloubow of LFR, and Jerry Wickham of ACEH accompanied Mr. Rigter during the site inspection. AOC #1 was inspected on July 18, 2008 by Jerry Wickham of ACEH to identify additional areas of AOC #1 that may require additional sampling or excavation. Mr. John Rigter of the Livermore-Pleasanton Fire Department, Lee Cover of Hanson Aggregates, and Ron Goloubow of LFR also participated in the site inspection of AOC #1.
7. **Facility Closure and Roles of CUPA and ACEH.** The Livermore-Pleasanton Fire Department is the Certified Unified Public Agency (CUPA) for AOC #1 and AOC #3 at the Hanson Radum facility. The Livermore-Pleasanton Fire Department has requested a

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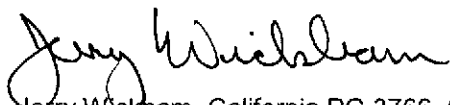
present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this 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

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

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

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  
File

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

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

#### REQUIREMENTS

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

#### Additional Recommendations

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

#### Submission Instructions

##### 1) Obtain User Name and Password:

- a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
  - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
  - or
  - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker)** you will be posting for.

##### 2) Upload Files to the ftp Site

- a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
  - (i) Note: Netscape and Firefox browsers will not open the FTP site.
- b) Click on File, then on Login As.
- c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
- d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
- e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

##### 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs

- a) Send email to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site.
- b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto:firstname.lastname@acgov.org))
- c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)