



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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FAX (510) 337-9335

October 7, 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 Radum 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 document 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 prepared by LFR Environmental Management & Consulting Engineering. The Work Plan proposes additional soil characterization in the vicinity of those structures in AOC#1 that will remain in place in order to confirm that soils beneath and adjacent to those structures do not contain petroleum hydrocarbons at concentrations exceeding cleanup goals. The Work Plan proposes five soil borings in AOC#1.

We request that the Work Plan be revised to include a more detailed map of AOC#1 as discussed in technical comment 1 below. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

Please note that ACEH case RO0002941 applies to a 15-acre parcel that includes ACO#1 and part of AOC#2. ACEH case RO0002952 applies to the remainder of the Hanson Radum facility including AOC#3 through 9 and part of AOC#2. Therefore, the activities proposed in the Work Plan will be conducted as part of ACEH case RO0002941.

TECHNICAL COMMENTS

- 1. Facility Closure and Roles of CUPA and ACEH.** The Livermore-Pleasanton Fire Department is the Certified Unified Public Agency (CUPA) for AOC #1 at the Hanson Radum facility. The Livermore-Pleasanton Fire Department has requested a closure plan for the facility and separate detailed closure plans for specific areas of the facility. Facility closure is to be conducted in accordance with the requirements of the CUPA. These requirements may include sampling or other activities that may detect subsurface contamination. Subsurface contamination that is detected as part of the facility closure activities or investigations will be evaluated by ACEH and may require further investigation and/or cleanup under the existing SLIC cases for the facility.

- 2. Paving Oil Containment Structure and Truck Scale.** The Work Plan does not include proposed soil sampling in the area of the Paved Oil Containment Structure and Truck Scale. Based on discussions during a July 18, 2008 site inspection, we understand that the Paving Oil Containment Structure and Truck Scale are planned for removal. Removal of the structures and confirmation sampling is to be conducted in accordance with requirements of the Livermore-Pleasanton Fire Department for facility closure as discussed in technical comment 1. Subsurface contamination that is detected during the removal of these features will be evaluated by ACEH and may require further investigation and/or cleanup under the existing SLIC cases for the facility.
- 3. Proposed Sampling Locations.** The Work Plan proposes three soil borings in the eastern portion of the former hot mix asphalt plant and two soil borings in the area of a small building east of the former hot mix asphalt plant. The purpose of the soil borings is to evaluate where subsurface contamination is present in the area of and below the structures. Therefore, soil sampling should be conducted within those areas where a release to the subsurface was most likely. Although the types of activities conducted in the areas of these structures are not well known, specific features such as sumps, basins, and piping should be targeted for sampling. The scale of the map in the Work Plan does not allow details of the area to be shown. We request that you submit a Revised Work Plan with a more detailed map or aerial photograph of the structures that will remain in place showing site features such as piping or any potential containment structures along with the proposed sampling locations. Please revise or add sampling locations as appropriate based on the additional information shown on the more detailed site map.
- 4. Soil Sampling.** We concur with the proposal to continuously log and screen soil samples in the proposed borings. We request soil samples be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed in the borings, the collection of soil samples for laboratory analysis at fixed intervals is acceptable. However, we request that soil samples be collected for laboratory analysis from the fixed depths of 1.5, 3, 5, and 8 feet bgs if no visible staining, odor, or elevated PID readings are observed. The proposal to hold analysis of the sample collected from a depth of 8 feet bgs from each boring pending the analytical results of shallower soil samples is acceptable. Please present these plans in the Revised Work Plan requested below.
- 5. Investigation-Derived Waste.** In the Revised Work Plan requested below, please revise the procedures for investigation-derived waste to include containment of soil cuttings in Department of Transportation approved 55-gallon drums pending receipt of characterization data and proper disposal. Please describe the management, labeling, handling, and disposal methods for investigation derived waste that are protective of site workers and occupants.

TECHNICAL REPORT REQUEST

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

- **December 5, 2008** – Revised Work Plan for AOC #1 Sampling
- **40 days after end of each quarter** – Groundwater Monitoring Report

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).

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.

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

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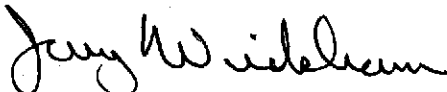
present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this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

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

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

Ron Goloubow, LFR, 1900 Powell Street, 12th 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

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
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 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)
 - c) The subject line of the e-mail must start with the RO# followed by Report Upload. (e.g., Subject: RO1234 Report Upload)