

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
DAVID J. KEARS, Agency Director



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

January 29, 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 recently submitted document entitled, "*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 and prepared by LFR Environmental Management & Consulting Engineering. LFR previously submitted a Work Plan dated September 15, 2008 to conduct additional soil characterization in the vicinity of those structures in AOC#1 that will remain in place. ACEH provided technical comments on the Work Plan in correspondence dated October 7, 2008 and requested preparation of a Revised Work Plan for Sampling In AOC#1. The December 5, 2008 document by LFR presents responses to technical comments in the October 5, 2008 ACEH correspondence in lieu of preparation of a Revised Work Plan.

The responses in the December 5, 2008 correspondence are generally acceptable. The proposed soil sampling and excavation may be implemented in accordance with the Work Plan dated September 15, 2008 and December 5, 2008 correspondence provided that technical comment 1 below is addressed during implementation of the proposed sampling. Preparation of a Revised Work Plan for the proposed soil sampling is not required. However, additional sampling is expected to be required as part of facility closure requirements. 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.

The proposed soil sampling may be implemented at this time as discussed in the previous paragraph. However, we understand that it may be cost effective to conduct the soil sampling and excavation proposed in response to site investigation and cleanup under ACEH oversight with soil sampling and excavation conducted as part of facility closure requirements. Therefore, the schedule requested by ACEH at this time for implementation of the proposed sampling activities is contingent upon the schedule for implementation of the facility closure requirements for the Livermore-Pleasanton Fire Department (see Technical Report Request below). The schedule requested by ACEH may be modified in the future depending upon facility closure requirements or other factors.

### **TECHNICAL COMMENTS**

- 1. 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. These five proposed soil boring locations are acceptable; however, we request that one additional soil boring be advanced immediately north of a concrete basin or containment feature shown on the attached figure labeled, "Additional Soil Sampling Location." Please present the results of the sampling in the Soil Sampling Report requested below.
- 2. Case Designation.** 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 discussed in the proposed in the Work Plan will be conducted as part of ACEH case RO0002941. Please submit future correspondence and reports regarding AOC#1 under ACEH case RO0002941.

### **TECHNICAL REPORT REQUEST**

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

- **90 days following approval of a Facility Closure Plan by Livermore-Pleasanton Fire Department** – Soil Sampling Report
- **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.

Mr. Lee Cover  
Mr. Steven Dunn  
RO0002941  
January 29, 2009  
Page 3

#### 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.

#### 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.

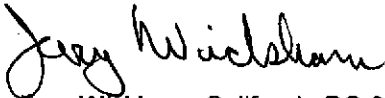
#### AGENCY OVERSIGHT

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.

Mr. Lee Cover  
Mr. Steven Dunn  
RO0002941  
January 29, 2009  
Page 4

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: Additional Soil Sampling Location figure

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

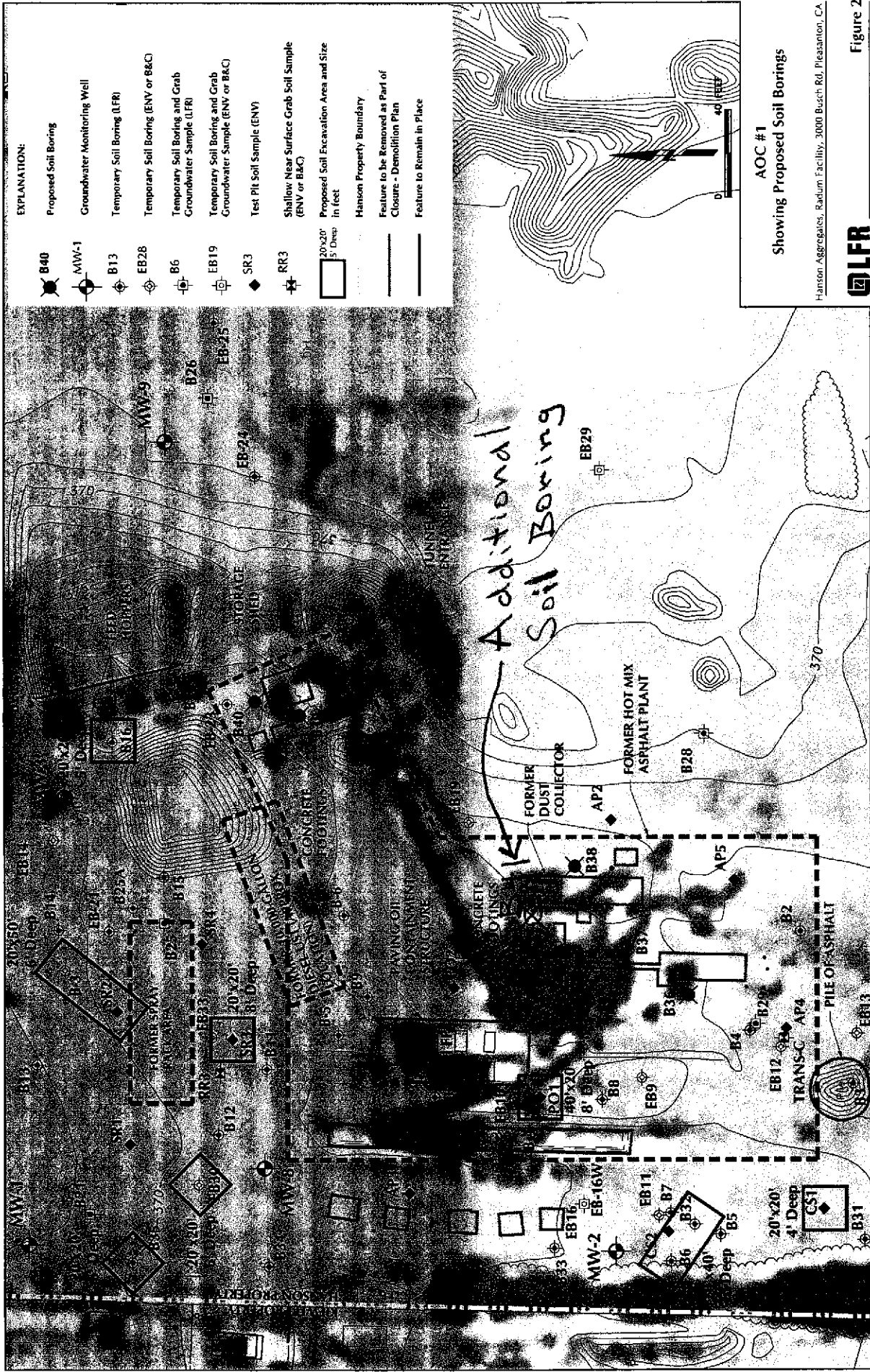
John Rigter, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566

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  
File



Additional Soil Sampling Location

<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)