LFR ENVIRONMENTAL MANAGEMENT & CONSULTING ENGINEERING

September 15, 2008 001-09567-02

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3:01 pm, Sep 19, 2008

Alameda County
Environmental Health

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

Subject: Work Plan for Additional Site Characterization at Selected Areas Within AOC #1, Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California, SLIC Case RO0002952 and Geotracker ID SL0600101555

Dear Mr. Wickham:

LFR Inc. (LFR) is pleased to present this Work Plan to conduct additional soil characterization at the Hanson Aggregates Northern California ("Hanson") Radum Facility located at 3000 Busch Road in Pleasanton, California ("the Site"; Figures 1 and 2). This Work Plan is submitted in response to a request from Alameda County Environmental Health (ACEH) included in its letter to Hanson dated July 29, 2008, regarding the results of the July 18, 2008 site inspection conducted at area of concern #1 (AOC #1) at the Site. The July 29, 2008 ACEH letter included a discussion of a site inspection conducted on July 18, 2008 and requested that Hanson collect additional soil characterization samples at select locations within AOC #1 (Figure 2).

Background

Representatives of ACEH, the Livermore-Pleasanton Fire Department, and Hanson conducted a field inspection of AOC #1 on July 18, 2008. The objective of this inspection was to assess whether additional characterization or remediation may be warranted for areas within AOC #1, based on field observations and known site history.

Based in part on the findings from the July 18, 2008 site inspection, ACEH has requested additional soil characterization in the vicinity of those structures that are planned to remain in place in order to confirm that soils beneath and adjacent to these structures do not contain petroleum hydrocarbons at concentrations exceeding cleanup goals.

ACEH also requested additional soil characterization adjacent to a small building and three smaller structures located in the northeastern portion of AOC #1.

510.652.4500 m
510.652.2246 f

1900 Powell Street, 12th Floor
Emeryville, California 94608-1814
Offices Nationwide

www.lfr.com

Objective

The objective of the scope of work presented in this Work Plan is to assess for the presence of petroleum hydrocarbons in soil in the vicinity of selected structures that will remain in place at AOC #1 after remedial and demolition activities are completed. Chemical analysis data collected from this investigation will be compared with screening-level cleanup goals. Results of this comparison will be used to evaluate whether the existing structures can be left in place, or whether additional remedial measures may be warranted.

Scope of Work

The scope of work for this Work Plan includes the following tasks:

Task 1: Pre-Field Activities

Prior to drilling soil borings or installing wells, LFR will obtain drilling permits and pay permit fees to the Zone 7 Water Agency, Alameda County Flood Control and Water Conservation District.

The existing site-specific Health and Safety Plan previously prepared by LFR for subsurface investigation will be updated if necessary to address health and safety concerns specific to the planned field activities. Daily health and safety tailgate meetings will be conducted prior to beginning fieldwork, and fieldwork will be monitored to ensure that appropriate health and safety procedures are followed during the field investigations.

In accordance with Hanson's standard facility operations, LFR and our subcontractors will attend an on-site health and safety training seminar conducted by a Hanson representative if we have not already received this training.

Approximately two days prior to commencement of field activities, LFR personnel will mark proposed soil boring locations at the Site with white paint and then notify Underground Service Alert (USA), an underground utility notification service. USA will then notify its members to visit the Site and mark the locations of any utilities that they may have in the vicinity of the proposed soil borings. LFR will also retain a private underground utility location company to clear and mark underground utilities that may be in the vicinity of each of the proposed soil borings.

Task 2: Field Investigation

The proposed field investigation for this project will include the drilling of five soil borings for the collection of depth-discrete soil samples. Details regarding the collection and analysis of the proposed soil samples are presented below.

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Lithologic Logging Procedures and Field Documentation

Conventional visual lithologic logging will be conducted of the soil sample cores collected from the soil borings advanced using hollow-stem augur (HSA) drilling techniques. An LFR field geologist will classify the soil samples using American Society for Testing and Materials (ASTM) D 2488-93, which is based on the Unified Soil Classification System. Lithologic descriptions will be recorded on field boring logs that will be reviewed, edited, and signed by a California Professional Geologist.

Eight-inch-diameter HSAs will be used to drill each boring. A 1.5-foot-long split-spoon sampler lined with brass-tube sample containers will be used to collect soil samples. The augers will be advanced to the specified depth for sample collection. The split-spoon sampler will then be driven into the undisturbed soil through the augers by using a 140-pound slide hammer, or the equivalent. The sampler will be driven in 1.5-foot intervals from 1.5 to 8 feet below ground surface (bgs) so that samples are collected on a continuous basis. Soil samples will be collected for lithologic evaluation, field screening, and laboratory analyses. Soil cuttings and soil samples will be screened in the field using a photoionization detector (PID) to evaluate the presence of hydrocarbons or other volatile organic compounds, and results will be recorded on the soil boring log.

Downhole drilling and sampling equipment will be appropriately cleaned with high-pressure hot water (steam cleaned) before use at each new drilling location. After soil samples are collected, each borehole will be abandoned by sealing it with a mixture of cement and bentonite ("grout") poured directly into the borehole. Waste soil generated during drilling will be placed on plastic tarps on the ground surface near each temporary soil boring and will be disposed of as necessary during future land development activities.

Relevant field activities will be appropriately documented using field forms, including field logs of soil borings, sample labels, chain-of-custody forms, and waste management and hazardous waste labels. Field forms will be kept on file at LFR and will be available upon request. Copies of relevant field forms will be included in the summary report.

Collection of Soil Samples

Depth-discrete soil samples will be selected for laboratory analyses from each soil boring at the predetermined depths of approximately 3 and 5 feet bgs. The soil sample collected from 8 feet bgs will be submitted to the laboratory on hold pending the analytical results of the soil samples collected from depths of approximately 3 and 5 feet bgs. Soil samples selected to be submitted for laboratory analyses will be sealed, properly labeled, and stored in ice-chilled coolers for transport to the analytical laboratory under chain-of-custody protocol.

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Laboratory Analyses

Each of the groundwater samples will be submitted to Curtis & Tompkins, Ltd., a state-certified laboratory located in Berkeley, California, for the following analyses:

- total petroleum hydrocarbons (TPH) as diesel (TPHd) and TPH as motor oil (TPHmo) using Environmental Protection Agency (EPA) Method 8015B
- benzene, toluene, ethylbenzene, and total xylenes using EPA Method 8021B

Task 3: Preparation of Summary Report

LFR will prepare a summary report for submittal to ACEH that presents the results of the investigation described above. The report will include lithologic logs, laboratory analytical data, and an interpretation and discussion of those data. The results of the investigation will be used to provide additional data requested by ACEH for selected areas within AOC #1.

The report will be uploaded to the Geotracker system and ACEH file transfer protocol (FTP) site in accordance with Regional Water Quality Control Board and ACEH requirements.

Following your review of this Work Plan, please do not hesitate to contact either Ron Goloubow at (510) 652-4500 or Lee Cover of Hanson at (925) 426-4170 if you have questions or comments regarding our responses to your technical comments or the proposed scope of work outlined in the Work Plan.

Sincerely,

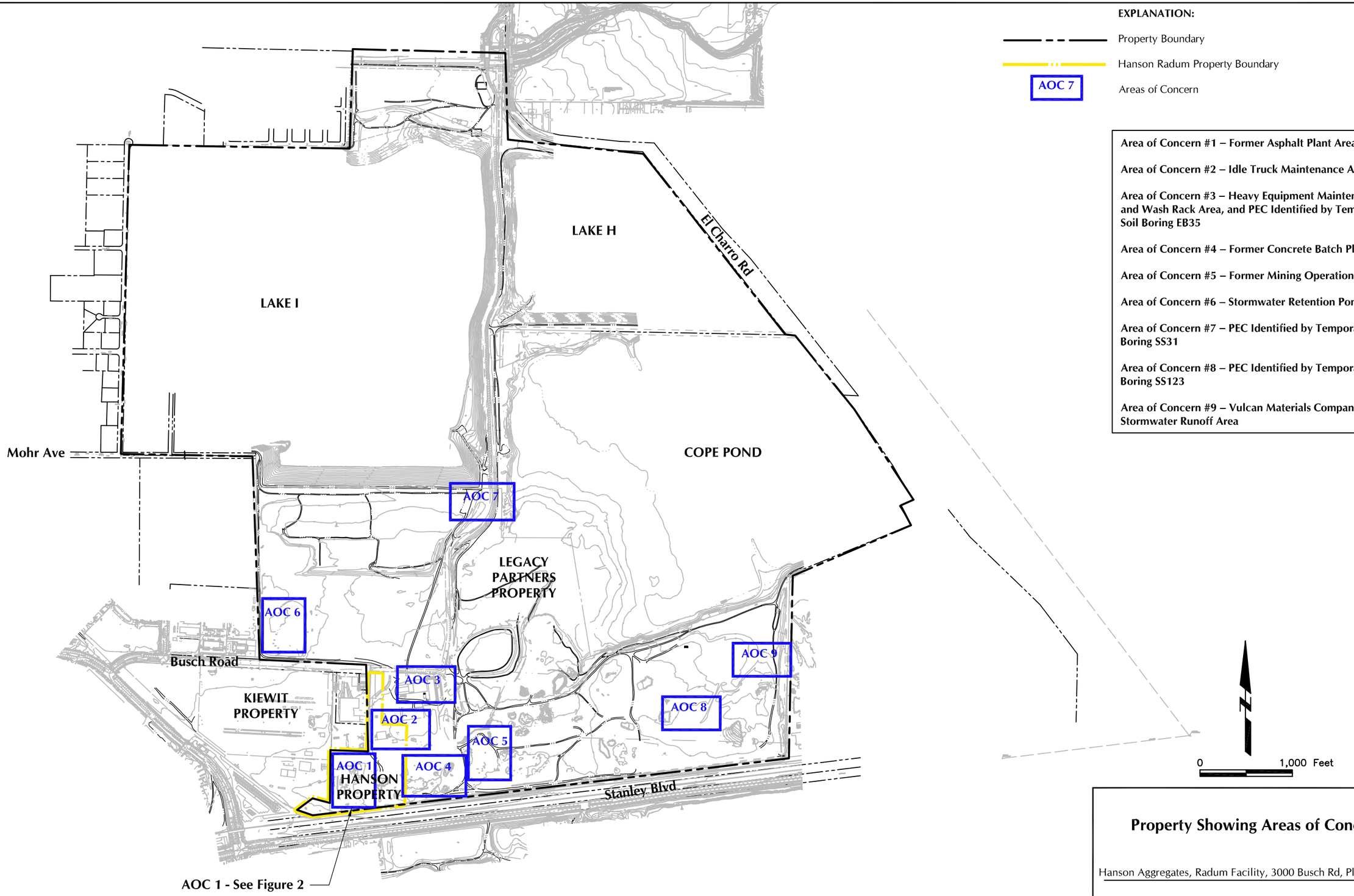
J. Scott Seyfried, P.G. #7374, CH.G
Principal Hydrogeologist

Ron Goloubow
Senior Associate Geologist

cc: Lee Cover, Hanson Aggregates Northern California

Attachments:

Figure 1 - Property Showing Areas of Concern
Figure 2 - AOC #1 Showing Proposed Soil Borings



Property Showing Areas of Concern

Hanson Aggregates, Radum Facility, 3000 Busch Rd, Pleasanton, CA

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Figure 1

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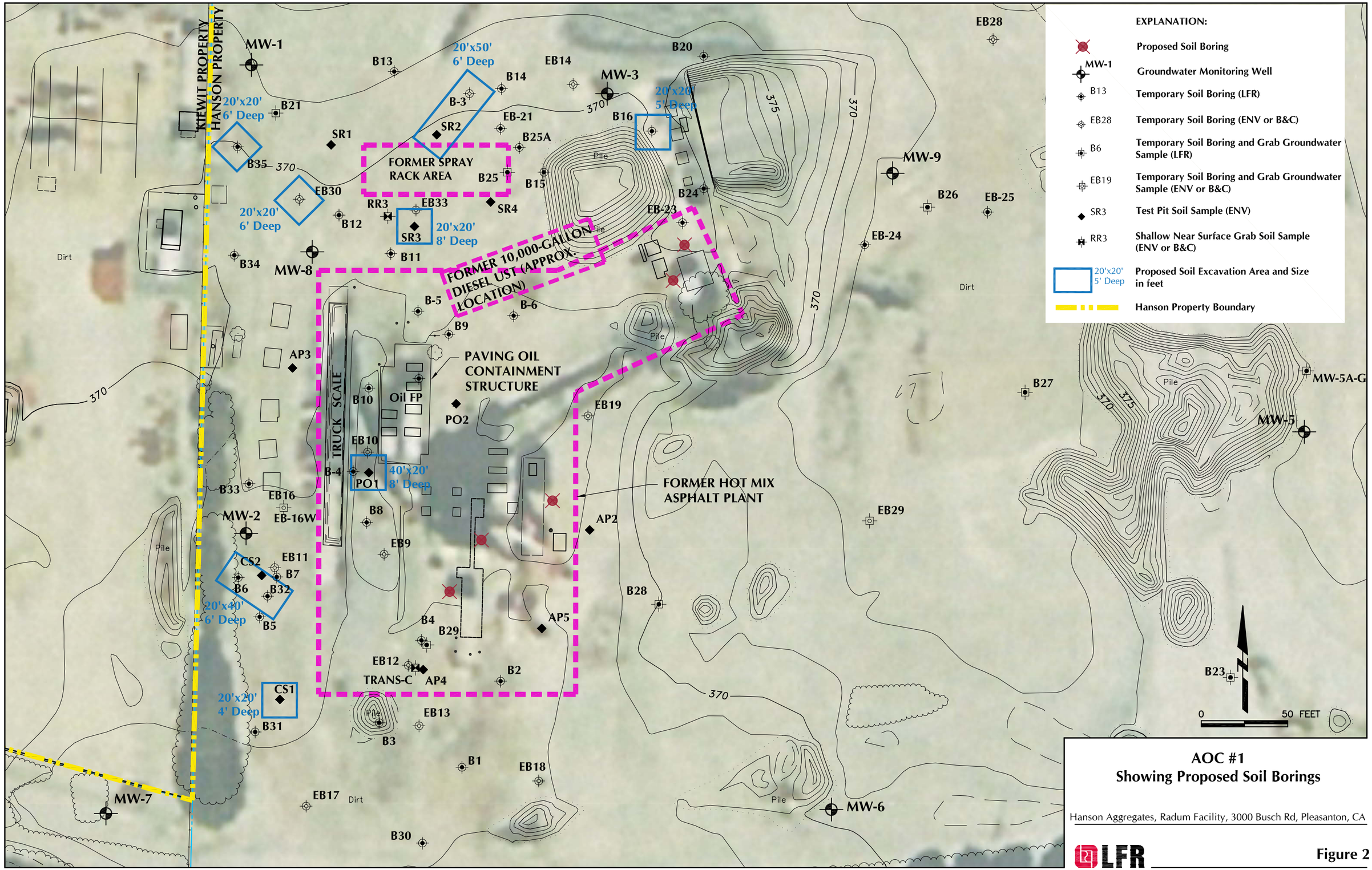

AOC #1
Showing Proposed Soil Borings

Hanson Aggregates, Radum Facility, 3000 Busch Rd, Pleasanton, CA

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Figure 2

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