

Wickham, Jerry, Env. Health

To: Cover, Lee (Pleasanton) NA
Cc: Drogos, Donna, Env. Health; Howell, Marvin (Miramar) NA
Subject: RE: Hanson Aggregates SLIC Case No. RO0002941 Fund Replenishment

Lee,

I have reviewed the request for a new case and concur with the request. We have started the administrative procedures for creating the case. I expect to complete that process and get out a letter with a request for oversight funds by 7/25.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: Cover, Lee (Pleasanton) NA [mailto:Lee.Cover@hanson.biz]
Sent: Wednesday, July 18, 2007 3:12 PM
To: Wickham, Jerry, Env. Health
Cc: Drogos, Donna, Env. Health; Howell, Marvin (Miramar) NA
Subject: Hanson Aggregates SLIC Case No. RO0002941 Fund Replenishment

Jerry,

Attached please find a copy of Hanson Aggregates cover letter and check to replenish SLIC Case No. RO0002941 oversight fund, for your records. Also can you tell me the status of your review of Hanson's July 9th letter requesting a new SLIC case number for the Hanson property? Please advise. Thanks.

<<SLIC Case No RO0002941 Oversight Fund Letter to ACEH 07-18-07.pdf>>

Lee W. Cover

Environmental Manager

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RO2941 and
RO2952



July 9, 2007

Alameda County Environmental Health Services
1131 Harbor Bay Parkway
Suite 250
Alameda, California 94502-6577

Subject: Hanson Aggregate's Radum Property located at 3000 Busch Road, Pleasanton, Alameda County, California – Request for New Case Number

Dear Mr. Wickham:

Hanson Aggregates, Northern California (Hanson), is submitting this letter and enclosures in response to technical comment No.1 of your June 22, 2007, letter titled "SLIC Case RO0002941 and Geotracker Global ID SLT19719376 , Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566." As discussed with you during the June 20, 2007, meeting held at the Alameda County Environmental Health (ACEH) offices, Hanson is requesting that a new ACEH case number be established for a portion of the Hanson Radum property located at 3000 Busch Road, Pleasanton, California. Currently ACEH case number RO0002941 is established for this property. As discussed during the June 20 meeting, a property transfer transaction is underway for the majority of the property. Hanson will retain the portion of the property delineated by the Lot Line Adjustment (approximately 15 acres; Parcel 1) and the small irregularly shaped area located south of the Kiewit property; these areas are identified on attached Figures 1 and 2 (yellow and green lines, respectively). The rest of the property is planned to be transferred to Legacy Partners.

Hanson is requesting that the ACEH consider the area defined by the orange line on the attached figures that encompasses the Lot Line Adjustment area and the portion of the property located south of the Kiewit Property, under a separate case number. This area encompasses all of Area of Concern (AOC) #1 and part of AOC #2, as defined in the "Work Plan for Additional Site Characterization at the Hanson Aggregates' Radum Facility, 3000 Busch Road, Pleasanton, California", submitted to the ACEH on May 16, 2007. If possible, Hanson would like to retain the existing SLIC case number RO0002941 for this approximately 15-acre area outlined in orange on Figures 1 and 2, and have a new case number assigned to the rest of the property at 3000 Busch Road.

Figure 3 presents detail of the former hot mix asphalt plant area (AOC #1). As shown on Figure 3, the area in question encompasses the entire former hot mix asphalt plant area and associated structures and/or former facilities including the former spray rack area, former 10,000 gallon diesel UST, and remaining concrete structures. The area of the free product material previously identified between approximately 30 and 40 feet below ground surface is located entirely within the area delineated by the orange line, as are all of the additional temporary soil borings and new groundwater monitoring wells proposed for AOC #1, and the new temporary

July 9, 2007

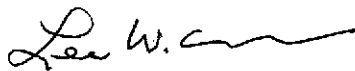
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soil boring requested by the ACEH located immediately south of the Kiewit property. The area also encompasses the following features from AOC #2: seven former USTs located east (3), west (2), and north (2) of the truck maintenance shop, the truck maintenance shop itself currently operated by the Pleasanton Garbage Company, and the approximately 640-foot-deep Zone 7 water supply well. Of the potential environmental conditions (PECs) identified in AOC #2, only former temporary soil boring E-31 required additional subsurface investigations. The former soil boring E-31 area would further be characterized in conjunction with all other investigations currently proposed for AOCs #3 through #9.

For your information, Table 1 from the Work Plan was amended and updated to reflect technical comments from your June 22, 2007 letter regarding additional sample locations and/or depths. Where appropriate, an approximate schedule of drilling and sampling activities was included in the last column of the table for the areas outside the lot line adjusted Parcel 1 area.

If you have questions or comments regarding this request, the area defined, and/or how the proposed characterization investigations will be conducted under the two separate ACEH case numbers, please do not hesitate to contact me at 950-426-4170 or Katrin Schliewen with LFR at 510-596-9637. Thank you.

Sincerely,



Lee Cover
Environmental Manager
Hanson Aggregates Northern California

Enclosures: Table 1. Environmental Conditions at the Hanson Radum Facility
Figure 1. Site Plan Showing Areas of Concern and Area Proposed for Separate ACEH Case Number
Figure 2. Detail of Area Proposed for Separate ACEH Case Number
Figure 3. Area of Concern #1 Former Hot Mix Asphalt Plant Area with Area Proposed for Separate ACEH Case Number

cc: Marvin Howell, Hanson Aggregates
Katrin Schliewen, LFR

**Table Letter-1
Environmental Conditions at the Hanson Radum Facility
3000 Busch Road, Pleasanton, California**

| Area of Concern ¹ | PEC or REC Identified in Phase I ² | Site Condition(s) ³ | Data Gap | Recommended Action ⁴ | LFR Work Scheduled ⁵ |
|--|---|--|---|--|---------------------------------|
| <p>AOC #1 AOC #2</p> <p><i>Lot Line Adjustment and South of Kiewit Area: Former Hot Mix Asphalt Plant Area and Idle Truck Maintenance Area</i></p> | Former asphalt plant operations area; operations included the use of paving oil, lubricants, and fuels. | Partially demolished concrete structures containing oily water remain at the Site. TPHd and TPHg were detected at concentrations above the ESLs in soil samples collected between approximately 7 and 15 feet bgs from temporary soil borings south of the former asphalt plant. | The lateral extent of TPHd and TPHg in soil at approximately 7 to 15 feet bgs to the south of the former asphalt plant has not been sufficiently characterized. | Advance one three new temporary soil borings, one to approximately 20 feet bgs and two to 60 feet bgs. As part of the final demolition of the remaining structures, affected soil will be removed in specific areas to depths of approximately 8 feet bgs. | TBD |
| | Paving oil containment structure located approximately in the center of the former asphalt plant area. | TPH was detected at concentrations above the ESLs in 2 soil samples collected from approximately 2 and 8 feet bgs. | None | As part of the final demolition of the remaining structures, affected soil will be removed in specific areas to depths of approximately 8 feet bgs. | TBD |
| | Contaminated soil area located in southwest portion of the asphalt plant area, as identified in the Phase II report by ENV. | Based on the ENV Phase I and II reports, LFR believes that the "contaminated soil area" refers to the contaminated soil excavated primarily from the Kiewit property located west of the Site. TPH was detected at concentrations above the ESLs in soil samples collected from depths between approximately 5 and 18 feet bgs in three locations west of the former asphalt plant. | The vertical extent of TPHd and TPHmo in soil deeper than 18 feet bgs has not been sufficiently characterized. | Advance one three new temporary soil borings, to approximately 25 feet bgs. Remove affected soil in specific areas to depths up to 8 feet bgs to be protective of human health, as described in the November 2006 Additional Phase II report by LFR. | TBD |
| | One former 10,000-gallon diesel UST was removed from near the former asphalt plant in 1995. | Reportedly, the former UST was in good condition when it was removed in 1995. Confirmation soil samples collected from the bottom of the former UST excavation resulted in TPHd and TPHmo detected in soil at low concentrations below the ESLs. A "no further action" case closure letter was received from the ACEH on March 9, 1998. | None | None | None |
| | Former diesel spray rack where diesel was spayed into truck beds to prevent asphalt from sticking. | TPHd and/or TPHmo was detected at concentrations above the ESLs in soil samples collected from approximately 5 to 7 feet bgs. | The lateral extent of TPHd and TPHmo in soil at approximately 5 feet bgs to the west of the former asphalt plant has not been sufficiently characterized. | Advance two new temporary soil borings to approximately 10 feet bgs. As part of the final demolition of the remaining structures, affected soil will be removed in specific areas to depths of approximately 8 feet bgs. | TBD |
| | Deep soil contamination identified between 30 and 40 feet bgs in the northern portion of this area. | A petroleum hydrocarbon product described as being thick, heavy, black, and/or viscous, was identified (primarily visually) between approximately 30 and 40 feet bgs in the northern portion of the former asphalt plant area. LFR confirmed the presence of a black product material in soil from approximately 30 to 31.5 feet bgs in one soil boring; however, the black product was not present in the soil samples from approximately 25 and 35 feet bgs. Analytical results from one soil sample collected from the black product resulted in TPHd and TPHmo concentrations up to approximately 9,000 mg/kg, exceeding the ESLs. | The lateral extent to the south and the vertical extent of the heavy black petroleum product has not been sufficiently characterized. The nature and potential source of the petroleum product has not been adequately defined. | Investigate the nature and potential source of the petroleum product, including collected samples for fingerprinting analyses. Advance three new temporary soil borings within and to the southeast of the black product to collect soil samples above, within, and below the black product interval, and to collect grab groundwater samples from beneath the black product interval. | TBD |
| | Groundwater contamination. | Groundwater was encountered and sampled between approximately 50 to 60 feet bgs in seven temporary soil borings. TPHd and/or TPHmo were detected at concentrations exceeded the ESLs, in the grab groundwater samples collected from two locations (EB-29 by ENV and B-22 by LFR) approximately east and southeast of the black product. | The lateral and vertical extent of TPH in groundwater has not been sufficiently characterized. The local groundwater flow direction and gradient are unknown. | Collect grab groundwater samples from three temporary soil borings advanced to further characterize the extent of the black product discussed above. Install five six new groundwater monitoring wells to approximately 65 feet bgs and located west, east, and southeast, and beneath of the black product, to monitor groundwater quality, determine the local groundwater flow direction and gradient, and conduct periodic groundwater monitoring and reporting. | TBD |
| | Pleasanton Garbage Company use of the truck maintenance shop. | Surface soil staining was noted outside the truck bays on the south side of the building. | None | May need to assess shallow soil quality after operations have ceased at the maintenance shop. | TBD |
| | Three USTs (two 12,000-gallon diesel and one 10,000-gallon gasoline) removed from the east side of the of the truck maintenance shop in November 1990. | TPHd was detected in confirmation soil samples from the former UST excavation at concentrations up to 1,600 mg/kg; further excavation was deemed impractical due to the presence of the aboveground water tank and building. Analytical results for groundwater samples collected annually from well MW-KP1 installed adjacent to the former UST excavation were below laboratory reporting limits for TPHd during 1994 through 1996. Well MW-KP1 was properly abandoned in 1998. This former UST area received regulatory closure in 1998. ENV subsequently collected six soil samples from between 5.5 and 29 feet bgs and one grab groundwater sample from 29 feet bgs from soil boring EB-2. TPHd, TPHg, TPHmo, BTEX, and PCBs were below analytical reporting limits in the soil samples; the groundwater sample contained TPHd at 79 µg/l, below the ESL for TPHd. | None | None | None |

**Table Letter-1
Environmental Conditions at the Hanson Radum Facility
3000 Busch Road, Pleasanton, California**

| Area of Concern ¹ | PEC or REC Identified in Phase I ² | Site Condition(s) ³ | Data Gap | Recommended Action ⁴ | LFR Work Scheduled ⁵ | |
|------------------------------|---|--|--|---|--|------------------------------------|
| (con't) AOC #1 AOC #2 | <i>(cont'd)</i> Lot Line Adjustment and South of Kiewit Area: Former Hot Mix Asphalt Plant Area and Idle Truck Maintenance Area | Two USTs (one 1,000-gallon waste oil and one 1,000-gallon new oil) removed from the west side of the of the truck maintenance shop in February 1995. | A total of four soil samples (two from beneath each UST) were collected from the base of the excavation for the former USTs, at approximately 11 feet bgs. ENV subsequently collected one soil sample from former soil boring EB-6 (20 feet bgs) and three soil samples from both EB-7 and EB-8 (2, 6, and 15 feet bgs). TPHd, TPHmo, and BTEX were not detected above analytical reporting limits. This former UST area received regulatory closure in 1998. | None | None | None |
| | | Two USTs (one 12,000-gallon diesel and one 10,000 gallon gasoline) removed from an area north of the truck maintenance shop in June or July 2003. | Confirmation soil samples collected from the base of the former UST excavation contained low concentrations of TPHd (between 10 and 210 mg/kg). Subsequent investigations by ENV and by B&C including collecting soil and grab groundwater from up to five temporary soil borings showed that TPHd, TPHg, TPHmo, BTEX, and PCBs were not detected above analytical reporting limits and/or the ESLs. This former UST area has received verbal regulatory closure and a formal closure letter is pending. | Pending receipt of formal "case closure" letter. | None | None |
| | | Water supply well. | A 640-foot-deep water supply well owned by Zone 7 is located southwest of the idle truck maintenance shop. The well was sampled by ENV in February 2007; analytical results indicated that TPHg, TPHd, TPHmo, BTEX, and metals (other than barium) were not present above analytical reporting limits. | None | None | None |
| AOC #2 | Idle Truck Maintenance Area | Soil boring EB31 area. | ENV advanced soil boring EB31 near the northeast corner of the idle truck maintenance yard because of a suspected former "waste pit" in this area, and collected soil samples from approximately 5, 10, 20, and 55 feet bgs. TPHd and TPHmo were detected at concentrations above the ESLs in the 10-foot sample. | The lateral extent of TPHd and TPHmo in soil at approximately 10 feet bgs in the vicinity of former soil boring EB31 has not been sufficiently characterized. | Advance three new temporary soil borings, two to approximately 20 feet bgs to collect soil samples and one to approximately 60 feet bgs to collect soil and grab gw samples. | 1 day to complete July 16, 2007 |

**Table Letter-1
Environmental Conditions at the Hanson Radum Facility
3000 Busch Road, Pleasanton, California**

| Area of Concern ¹ | PEC or REC Identified in Phase I ² | Site Condition(s) ³ | Data Gap | Recommended Action ⁴ | LFR Work Scheduled ⁵ | |
|------------------------------|---|--|---|--|--|-----------------------------------|
| AOC #3 | Heavy Equipment Maintenance Shop Area | Two existing aboveground storage tanks (ASTs) containing waste oil (200-gallon AST) and antifreeze (150-gallon AST) located near the heavy equipment maintenance shop. | The tanks are situated on a reinforced concrete pad that is part of the wash rack; the concrete is not visibly stained or cracked. A soil sample collected from 2 feet bgs from soil boring EB-5 contained TPHd at 170 mg/kg, slightly above the ESL for TPHd (100 mg/kg). | None | When the ASTs are removed, the concrete will need to be inspected for cracks and/or visible damage and shallow soil samples from beneath the concrete may need to be collected. No investigations are proposed at this time. | None |
| | | The lube shed containing 55-gallon drums of lubricants piped to the heavy equipment maintenance shop. | The ground surface outside the east side of the lube shed is bare soil; the darker color of the soil suggests that spillage has occurred over time. A soil sample collected from 2 to 2.5 feet bgs from soil boring B-1 contained TPHd, TPHmo, and TRPH at concentrations that exceeded ESLs. However, soil samples from test pit LS collected from 1, 8, and 15 feet bgs did not contain any significant TPH concentrations. | The lateral extent of the TPH contamination in shallow soil in front of the lube shed. | Advance one new temporary soil boring to approximately 40-60 feet bgs to the north of former soil boring B-1 for soil and grab groundwater sample collection. | 1/2 day to complete July 17, 2007 |
| | | The wash rack area and sump located next to the heavy equipment maintenance shop and the lube shed, and the associated oil-water separator and water recycling system. | The concrete ground surface of the wash rack is heavily stained with oil and grease and the sump appears encrusted with oil and grease; a drum next to the oil-water separator appears to be full of heavy black oil, and the overflow discharge hose was on the ground and oil stains were visible on the concrete. None of the seven soil samples collected from three soil borings (EB-3, EB-4, and B-2) resulted in any significant concentrations of TPH or TRPH. | None | The oil-stained concrete wash rack, ground surface, and oil-containing sump and associated piping will need to be properly decommissioned. | None |
| | | The storm-water drain inlet located adjacent to the wash rack sump may receive untreated water from the wash rack area and may drain to either the storm-water retention pond or to Cope Pond. | The storm drain appeared filled with sediment and grass and likely does not drain a significant volume of water from the wash rack area. The elevation of the sump appears to be lower than the storm-water drain; wash water likely will preferentially drain toward the sump. | None | Prevent wash water from entering the storm-water drain using sand bags or similar surface-water runoff controls. | None |
| | | Transformer E | Transformer E, located at the northeast corner of the heavy equipment maintenance shop, appears to be in good conditions with no obvious leaks or cracks. A soil sample collected from near transformer E (TRANS-E), from approximately 0.5 foot bgs, did not contain any reportable PCB concentrations, and no or insignificant TPH concentrations. | None | None | None |
| | | Soil boring EB-35 | As part of an investigation where sample locations were selected randomly, ENV advanced temporary soil boring EB-35 approximately 400 feet northeast of the Hanson offices. Soil samples were collected from 2, 10, 20, 30, and 40 feet bgs, and a grab groundwater sample was collected from 68 feet bgs. Only the 2-foot soil sample contained TPHd and TPHmo at concentrations that exceeded commercial ESLs, at concentrations of approximately 400 and 3,400 mg/kg, respectively. The potential source(s) of TPHd and TPHmo is unknown; the contamination likely is local and appears limited to shallow soil. | The lateral extent of the TPHd and TPHmo in shallow soil in the vicinity of EB-35. | Advance four new temporary soil borings to the north, east, south, and west, and in the vicinity of, former boring EB35 to approximately 10 feet bgs. | 1/2 day to complete July 17, 2007 |

**Table Letter-1
Environmental Conditions at the Hanson Radum Facility
3000 Busch Road, Pleasanton, California**

| Area of Concern ¹ | PEC or REC Identified in Phase ² | Site Condition(s) ³ | Data Gap | Recommended Action ⁴ | LFR Work Scheduled ⁵ | |
|------------------------------|---|--|---|--|--|-------------------------------------|
| AOC #4 | Former Concrete Batch Plant Area | Concrete batch plant operations may be associated with elevated pH in surface-water runoff. | The presence of this material on the ground surface can potentially lead to runoff of water with elevated pH. ENV collected a soil sample at approximately 0.5 foot bgs from test pit CB in the vicinity of the former concrete batch plant in September 2006. This soil sample was analyzed for pH and exhibited a pH of 8.11. There have been no known storm-water runoff violations for this site associated with pH. | None | None | None |
| | | One former 3,000-gallon diesel UST previously located adjacent to the aggregate conveyor. | This former UST was removed from the Site on February 6, 1995. Two soil samples collected from the base of the excavation for the former UST did not contain TPHd, TPHmo, or BTEX at concentrations greater than the ESLs. The ACEH provided a "case closure letter" for this UST in 1998. | None | None | None |
| | | Lubricants associated with the former concrete batch plant could have affected the shallow subsurface. | Soil boring SS128 that was drilled as part of a random sampling project conducted by ENV was located within the former concrete batch plan area. Soil samples collected from approximately 10, 20, 30, and 40 feet bgs from former boring SS128 did not contain TPHg, TPHmo, or BTEX above analytical reporting limits. | None | None | None |
| | | Four derelict plastic tanks suspected to have contained plasticizers. | Three soil samples were collected from a test pits excavated adjacent to the four poly tanks during September and October 2006. These samples did not contained PAHs or PCBs above analytical reporting limits. | None | Remove and properly dispose of the four poly ASTs and their contents. | None |
| | | Transformer B | Soil sample Trans B (collected from 0.5 foot bgs) was analyzed for PCBs, TPHd, and TPHmo; analytical results showed that this sample did not PCBs or TPHmo above analytical reporting limits. TPHd was detected a low concentration of 1.8 mg/kg, significantly below the ESL. | None | None | None |
| AOC #5 | Former Mining Operations Area | Transformer A | Soil sample Trans A (collected at 0.5 foot bgs) was submitted for analysis PCBs, TPHd, and TPHmo; PCBs and TPHmo were not detected above analytical reporting limits. TPHd was detected at a low concentration of 2.6 mg/kg, significantly less than the ESL. | None | None | None |
| | | Former rock crusher | One soil sample was collected from approximately 8 feet bgs from test pit CR; TPHd, TPHmo, and BTEX were not detected above laboratory reporting limits. | None | None | None |
| | | Former aboveground waste oil tank | One soil sample was collected from approximately 8 feet bgs from test pit WO; TPHd, TPHmo, and BTEX were not detected above analytical reporting limits. | None | None | None |
| | | Former rod mill | Three soil samples were collected from approximately 2, 8, and 14 feet bgs from soil boring RM. TPHmo and PNAs were not detected above analytical reporting limits; TPHd was detected in each sample at concentrations less than 20 mg/kg, significantly below the ESLs. | None | None | None |
| | | Abandoned drums | One soil sample was collected from approximately 0.5 foot bgs, labeled DR. TPHg, TPHd, TPHmo, and BTEX were not detected above analytical reporting limits. | None | Remove and properly dispose of the drums and their contents. | None |
| | | Former soil boring SS105 | Soil samples collected from approximately 2, 10, 20, 30, and 40 feet bgs and a grab groundwater sample did not contain TPHg, TPHd, TPHmo, or BTEX above analytical reporting limits. | None | None | None |
| AOC #6 | Sedimentation Pond | Storm-Water Retention Pond | ENV collected 8 soil samples (RP-A through RP-H) from approximately 0.5 foot bgs, and one sample from approximately 3.5 feet bgs (RP-C). Except for one sample result in which TPHd was detected at a low concentration of 8.8 mg/kg. TPHd, TPHmo, and TPHg were not present above analytical reporting limits in any of the soil samples. Nickel was detected in the 0.5-foot soil sample from RP-C above the ESL; however, the 3.5-foot sample result was below the ESL. B&C collected one sediment sample from near the storm drain that discharges storm water to the retention pond; this sample contained TPHd and TPHmo at 530 and 1,500 mg/kg, respectively, above the ESLs. B&C also collected a surface-water sample that contained TPHd at 170 mg/l, exceeding the ESL for Fresh Water Habitats (100 mg/l); TPHmo, TPHg, and VOCs were not detected above laboratory reporting limits. | Confirmation of TPH detections in the sediment and surface-water samples collected by B&C. | Collect two a minimum of four new shallow sediment samples along a transect extending from the B&C sediment sample location toward the center of the pond, and one new composite surface-water sample to confirm the TPH results by B&C. | 1 day to complete July 13, 2007 |
| AOC #7 | Soil Boring SS-31 Area | No PECs or RECs were identified; the area was investigated as a randomly chosen location by ENV in January 2007. | As part of an investigation where sample locations were selected randomly, ENV advanced soil boring SS-31 near the southeast corner of Lake 1. Soil samples were collected from 2, 10, 20, 30, and 40 feet bgs. The 2- and the 40-foot soil samples contained TPHd and TPHmo at concentrations that exceeded commercial ESLs, at concentrations of approximately 200 and 1,500 mg/kg, respectively. Analytical results for the 10-, 20-, and 30-foot samples were below reporting limits. The potential source(s) of TPHd and TPHmo is unknown. | The lateral and vertical extent of TPHd and TPHmo contamination in the soil. Because of the TPH detected in the deepest soil sample from 40 feet bgs, groundwater may be affected. | Advance four new temporary soil borings to approximately 60 feet bgs to collect soil and grab groundwater samples from locations north, east, south, and west of former boring SS-31 for laboratory analyses. | 2 days to complete July 18-19, 2007 |

**Table Letter-1
Environmental Conditions at the Hanson Radum Facility
3000 Busch Road, Pleasanton, California**

| Area of Concern ¹ | PEC or REC Identified in Phase I ² | Site Condition(s) ³ | Data Gap | Recommended Action ⁴ | LFR Work Scheduled ⁵ |
|------------------------------|---|---|--|---|--|
| AOC #8 | Soil Boring SS-123 Area No PECs or RECs were identified; the area was investigated as a randomly chosen location by ENV in January 2007. | As part of an investigation where sample locations were selected randomly, ENV advanced soil boring SS-123 in January 2007 in the middle of the open area south of Cope Pond. Soil samples were collected from 2, 10, 20, 30, and 40 feet bgs. The soil samples collected from 20, 30, and 40 feet bgs contained TPHd and TPHmo at concentrations that exceeded commercial ESLs, with the highest concentrations detected in the 40-foot sample (TPHd at 450 and TPHmo at 2,300 mg/kg). The potential source(s) of TPHd and TPHmo is unknown. In March 2007, ENV advanced four additional soil borings to the north, east, south, and west of SS-123 (SS-123(A) through SS-123(D)) and collected soil and grab groundwater samples. TPHd and/or TPHmo were detected at concentrations exceeding the ESLs in soil samples down to 40 feet bgs (the highest concentrations were detected in two of the samples from 20 feet bgs), and in the grab groundwater samples. According to Hanson, ENV has proposed to advance four new temporary soil borings stepping out from the previous step out locations to collect soil and grab groundwater samples for laboratory analyses. | The lateral and vertical extent of TPHd and TPHmo affected soil and groundwater. According to ENV, the grab groundwater samples may be representative of perched groundwater; therefore, the quality of the deeper groundwater (e.g., deeper than 40 feet bgs) has not been characterized. | No additional investigation is proposed in the vicinity of the former soil boring SS-123 pending results from the additional investigation proposed by ENV, which includes advancing four new temporary soil borings located approximately 100 feet from the previous step-out locations. Based on the recent ENV investigation (four step-out soil borings from SS-123(A) through SS-123(D)), advance three new temporary step-out soil borings to a depth of approximately 60 feet in the vicinity of the ENV boring that indicated elevated concentrations of TPH. Advance one new temporary soil boring in the vicinity of former boring SS-123 to a depth of 60 feet to investigate the vertical extent of TPH. | 2 days to complete July 20 and 23, 2007 |
| AOC #9 | Vulcan Mining Company Runoff Storm-water runoff from the Vulcan Materials Company (VMC) property onto the Hanson Radum property. | A berm was installed to prevent runoff from the VMC property to the Site. According to ENV, a Phase I ESA conducted previously on the VMC property indicated several PECs (e.g., staining, a faulty oil-water separator, and use of acidic chemicals for washing down trucks). Storm-water runoff from the VMC property onto the Site has occurred in the past and could contain contaminants found on the VMC property that would affect the Hanson property. ENV collected three shallow soil samples (0.5 foot bgs) from a drainage ditch where storm-water runoff has been known to occur; one of the soil samples (RO-B) contained TPHd at 130 mg/kg, slightly above the ESL. The shallow soil samples collected from either side of RO-B, namely RO-A and RO-C, did not contain TPH above the ESLs. | None | Verify that the berm installed to prevent storm-water runoff from the VMC property is functioning; repair the berm as necessary. | None |

**Table Letter-1
Environmental Conditions at the Hanson Radum Facility
3000 Busch Road, Pleasanton, California**

| Area of Concern ¹ | PEC or REC Identified in Phase I ² | Site Condition(s) ³ | Data Gap | Recommended Action ⁴ | LFR Work Scheduled ⁵ |
|------------------------------|---|--------------------------------|----------|---------------------------------|---------------------------------|
|------------------------------|---|--------------------------------|----------|---------------------------------|---------------------------------|

Notes:

¹ Area defined by LFR that encompasses one or more PECs or RECs.

² PEC or REC identified in the October 2006 Phase I Environmental Site Assessment report by ENV.

³ Condition of the site based on observations made by ENV during its Phase I investigation and/or by LFR during the April 2, 2007 site visit, and based on results from subsurface investigations conducted by ENV, LFR, and B&C.

⁴ LFR recommended action presented in May 16, 2007 Work Plan, updated based on technical comments from ACEBH in June 22, 2007, letter.

⁵ LFR scheduled field investigation activities to take place on dates noted, subject to field conditions; TDB = to be determined (schedule for the former asphalt plant area investigations and for miscellaneous site clean up activities has not yet been established).

µg/l = micrograms per liter

B&C = Brown and Caldwell Engineers

BTEX = benzene, toluene, ethylbenzene, and total xylenes

ESL = Environmental Screening Level Established by the RWQCB

feet bgs = feet below ground surface

mg/kg = milligrams per kilogram

PEC = potential environmental condition

REC = recognized environmental condition

TPHd = Total Petroleum Hydrocarbons as diesel

TPHg = Total Petroleum Hydrocarbons as gasoline

TPHmo = Total Petroleum Hydrocarbons as motor oil

UST = underground storage tank

VOCs = volatile organic compounds

