



2009 SEP 30 PM 4:21

September 25, 2009

Lee W. Cover
Hanson Aggregates Northern California
12667 Alcosta Blvd, Suite 400
San Ramon, CA 94583

RE: Review and Comments of the Facility Closure Plan for Hanson Aggregates Radium Facility, 3000 Busch Road, Pleasanton California

Mr. Cover:

The Livermore-Pleasanton Fire Department has reviewed the Facility Closure Plan prepared by LFR Inc. for the above mentioned facility. The Closure Plan and supporting documentation address Areas of Concern Numbers 1 through 3. Thank you for submitting this hazardous materials closure plan, our comments and required amendments to the plan follow.

1. In Section 4.1, 4.2, and 4.3, you state that containers, containment structures and contents will be field tested (liquid and sludge) for polychlorinated biphenyls (PCBs) and chlorinated volatile organic compounds (VOC's). What specific laboratory analytical methods will be used to confirm the field testing results?
2. What is the current proposed land use for each of the areas of concern? This will determine the required below grade cleanup levels, sample locations, and analytical methods to be used at the site. To a large extent, Livermore-Pleasanton Fire Department (LPFD) will defer to Alameda County Health Care Services for this part of the closure process.
3. Closure of the wash rack sump and related piping has not been adequately addressed. The wash rack system needs to be removed. The closure plan needs to be amended to include the following:
 - Provide wash rack configuration; chamber(s) and location of drainage piping (to outfall) on the site map.
 - Submit a cleaning, removal, waste sampling and disposal plan. Currently sump contains liquid and sludge. Wash rack sump chamber(s) and associated drainage piping need to be clean and empty prior to demolition and removal.
 - Submit a soil sampling and analytical plan for the area adjacent to the sump chamber(s) and associated piping.

3560 Nevada Street, Pleasanton, CA 94566

Administration & Suppression
(925) 454-2361
Fax 249-2397

Fire Prevention Bureau
(925) 454-2361
Fax 454-2367

- Submit a soil sampling and analytical plan for the area adjacent to the sump chamber(s) and associated piping.
4. Closure of the underground lubricant piping between the shed and warehouse/shop building has not been adequately addressed. The piping needs to be removed. The closure plan needs to be amended to include the following:
 - Provide system details; piping material, size and last known contents, and locate on the site map.
 - Submit a cleaning, removal and disposal plan describing the methods that will be used.
 - Submit a soil sampling and analytical plan for the area adjacent to the piping.
 5. Since the underground conveyer culvert discussed in Section 4.8 has not been removed (currently blocked at the entrances); this underground structure needs to be clearly located at the site. Please provide a site map that includes distances from known points of reference to this structure. In addition, ensure hazard signage is in-place. Current and future owners must be notified.
 6. To-date, very little hazardous materials storage and use information has been provided for the area east of AOC 3. This area contained main electrical switching and transformer equipment, part of the overhead conveyer system, and various buildings and structures (see attached aerial photograph). During our inspection of September 16, 2004, this was one of the areas visited by Larry Appleton and myself. Many of the structures were in the process of being torn down, and the area was being graded with heavy equipment. One of my concerns (among others) was the large electrical transformer units containing regulated levels of PCB's. Please see the attached copy of the inspection report and the concerns raised. These need to be addressed.

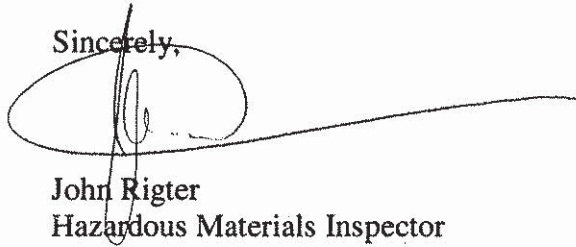
Provide additional information for this area including building locations, uses, hazardous materials storage and use (including quantities), and closure activities conducted to-date. In addition, provide sampling results (soil, material, waste, etc.) and disposal documentation.
 7. In the final Closure report, provide disposal documentation for all hazardous materials and wastes handled during this facility closure. Please ensure the document copies can be read, and the signed TSDF copies of the manifests are included.

Per our previous conversations, and included in the LPFD facility closure information documents provided, our plan review and inspection time for hazardous materials facility closure is billed at \$127.00/hour. You will receive a separate bill for the time incurred to-date.

Please continue to submit the Facility Closure Plan and related comments to both Livermore-Pleasanton Fire Department and Alameda County Health Care Services.

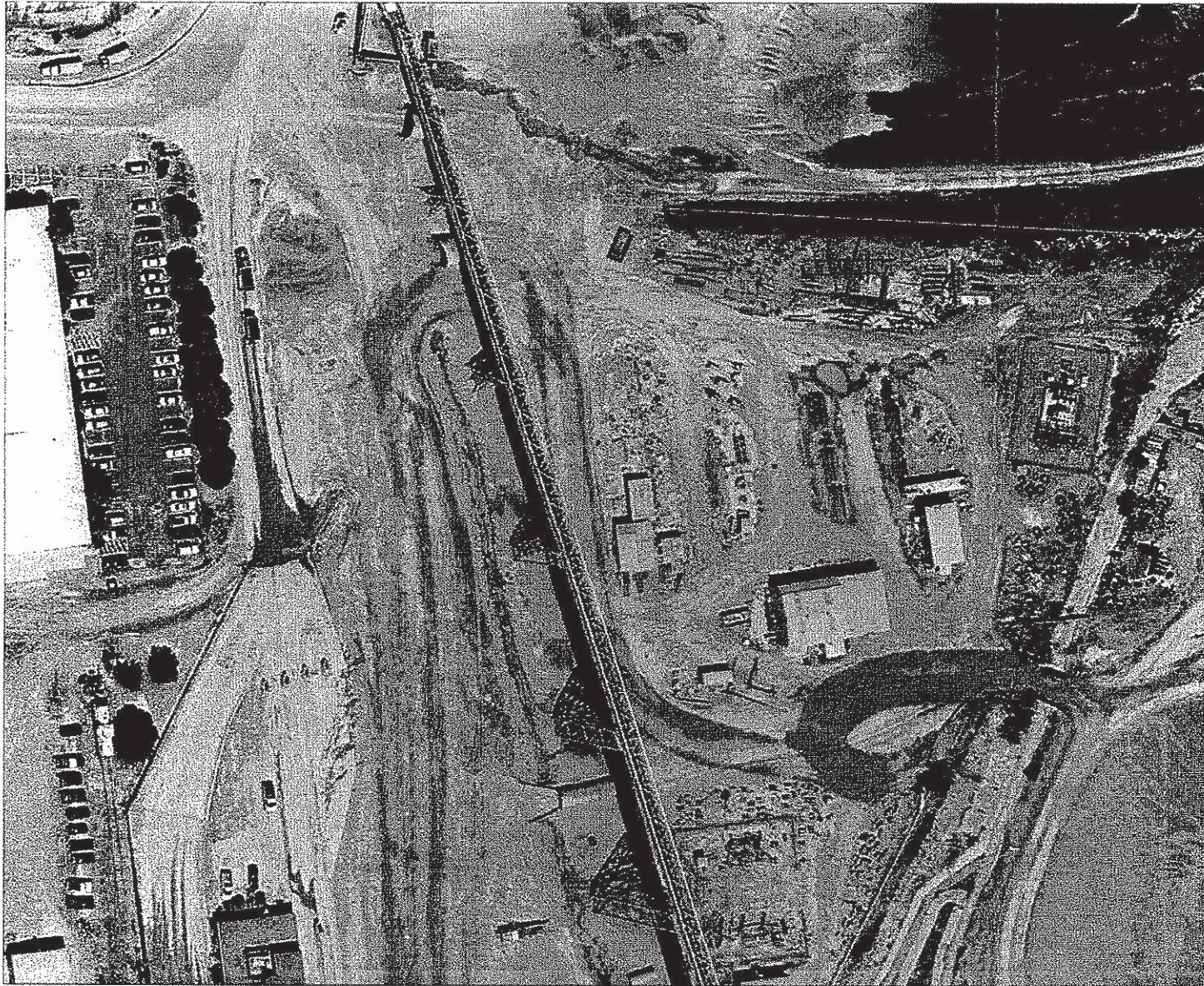
If you have any questions, I can be reached directly at (925) 454-2337. We appreciate your commitment to this closure process, and thank you for your patience and cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John Rigter", is written over the word "Sincerely,". The signature is stylized and extends horizontally to the right.

John Rigter
Hazardous Materials Inspector

Cc: Jerry Wickham, Alameda County Health Care Services
Bridget Metz, Legacy Partners

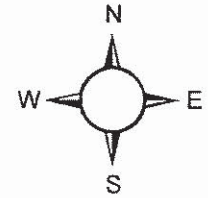


Notification Plot

City of Pleasanton

GIS

Department



Scale 1 in = 100 ft



LIVERMORE-PLEASANTON FIRE DEPARTMENT

INSPECTION REPORT
NARRATIVE

Name of Facility: <u>HANSON AGGREGATES</u>	Address: <u>3000 BUSCH ROAD, PL</u>
Inspector: <u>John Rister</u>	

INSPECTION/VISIT INCLUDED BRIEF WALKTHROUGH OF VARIOUS AREAS OF THE FACILITY INCLUDING:

- EQUIPMENT MAINTENANCE SHOP, RAILS STORAGE, AND OIL STORAGE AREA.

- DEMOLITION AREAS IN THE MAIN PLANT, AND ELECTRICAL SUBSTATION AREA.

REQUIREMENTS GOING FORWARD:

① SUBMIT CURRENT HAZARDOUS MATERIALS BUSINESS PLAN (HMBP) FOR THE FACILITY.

② SUBMIT FACILITY CLOSURE PLAN FOR ALL PLANT AREAS WHERE HAZARDOUS MATERIALS AND WASTE WERE STORED/DISPOSED/USED.

NOTE: CLOSURE ACTIVITIES CONDUCTED TO-DATE HAVE INCLUDED OIL AND GREASE STORAGE AND USE AREAS, ~~AND~~ ELECTRICAL TRANSFORMER AREAS (SOME WITH PCB'S ABOVE STATE REGULATED LIMITS), AND LEAD/ASBESTOS DUST AND MASTIC REMOVAL IN THE MAIN PLANT AREA.

- BUNTS HAZOP DOCUMENT PROVIDED (BY MAIL)

- FIRE CODE CLOSURE DOCUMENT TO BE PROVIDED BY EMAIL (LARRY.APPLETON@HANSONAMERICA.COM)

<u>Lawrence W Appleton</u>	LAWRENCE W APPLETON	9/16/04
Received by: Signature of Facility Representative	Printed Name	Date of Inspection