

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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November 28, 2007

Mr. Lee Cover  
Hanson Aggregates West Region  
Hanson Permanente Cement, Inc.  
3000 Busch Road  
Pleasanton, CA 94566-8403

Subject: SLIC Case RO0002952 and Geotracker Global ID SL0600101555, 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 report entitled, "Site Investigation Report for the Eastern Portion of AOC#2 and AOCs #3 through #9, Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, Alameda County, California," dated October 26, 2007 and prepared by LFR Inc. The Site Investigation Report presents the results of soil and groundwater sampling conducted at the site in July 2007. The July 2007 site investigation consisted of 16 soil borings advanced to depths of 10 to 70 feet bgs in various areas of concern.

We request that you prepare a **Work Plan by February 6, 2008** to address the following technical comments.

**TECHNICAL COMMENTS**

1. **AOC #2 Idle Truck Maintenance Area.** TPH as diesel and TPH as motor oil were detected in soil samples from each of the three borings advanced in the area of EB31 at concentrations up to 14 and 170 milligrams per kilogram (mg/kg), respectively. Groundwater does not appear to have been affected by petroleum hydrocarbons detected in soil in this area. Based on the results of the additional investigation, we concur that AOC #2 has been sufficiently characterized and no further investigation is requested in AOC #2.
2. **Petroleum Hydrocarbons in Shallow Soil in Vicinity of Boring EB35 in AOC #3.** Petroleum hydrocarbons described as, "dry, similar to asphalt concrete, with trace of oil," were observed in three of the four soil borings advanced around previous boring EB35. In general, a layer of petroleum-impacted soil was observed in the borings at depths of approximately 2 to 4 feet bgs. No soil samples were collected at depths less than 4 feet bgs. TPH as diesel and TPH as motor oil were detected at concentrations of 160 and 3,600 mg/kg, respectively in the shallowest soil sample (5 feet bgs) collected from boring EB-35b, which is the boring furthest to the south. The Site Investigation Report does not recommend additional subsurface investigations in this area but recommends that affected

material should be removed as necessary during redevelopment. We request that removal of petroleum-impacted shallow soils and confirmation soil sampling be conducted in this area prior to development. Soil removal should not be deferred until potential redevelopment. With regard to further investigation of the EB35 area, we do not object to defining the extent of soil removal by visual observation, screening, and confirmation soil sampling during soil removal. However, further definition of the extent of excavation may be advantageous for estimating the volume of soil for removal. In the Work Plan requested below, please present either: 1) plans for additional investigation of the extent of petroleum hydrocarbons in shallow soils, particularly soils less than 5 feet bgs, or 2) describe general plans for future soil removal and confirmation sampling.

3. **Petroleum Hydrocarbons in Groundwater near Heavy Maintenance Shop in AOC #3.** TPH as diesel and TPH as motor oil were detected at concentrations of 79 and 1,100 micrograms per liter ( $\mu\text{g/L}$ ), respectively, in the grab groundwater sample collected from boring B-1A. Groundwater was encountered in boring B-1A at a depth of approximately 65 feet bgs. Laboratory analytical reports describe TPH as diesel and motor oil in the groundwater sample that is heavier than the standards. These detections of TPH in groundwater from boring B-1A do not appear to be consistent with the conceptual model of limited spillage of heavier petroleum hydrocarbons to surface soil in the area of the lube shed and wash rack. We request that you conduct additional investigation in this area to evaluate whether the results from boring B-1A are representative of groundwater quality in this area and whether a significant subsurface source of petroleum hydrocarbons exists. Please propose additional investigation in the Work Plan requested below. As previously discussed in our June 22, 2007 correspondence, additional shallow soil sampling will be required in this area when the ASTs, wash rack, sump, and piping are decommissioned.
4. **AOC #8.** We concur that additional investigation is needed to characterize the source of petroleum hydrocarbons in groundwater in the area of boring SS123. We also request that you advance a minimum of two deeper soil borings to confirm that groundwater is perched in the area of boring SS123 and to assess whether the regional aquifer has been affected or potentially will be affected in the future. Please present your plans to further characterize the extent of petroleum hydrocarbons in soil and groundwater in the area of boring SS123 in the Work Plan requested below.
5. **Re-Sampling of Existing Monitoring Well 3S/1E 10D8.** We concur with the recommendation to re-sample well 3S/1E 10D8 due to the detection of dissolved mercury. Please include plans for re-sampling the well in the Work Plan requested below.

#### **TECHNICAL REPORT REQUEST**

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

- **February 6, 2008 – Work Plan**

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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 fuel leak 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 fuel leak case meet this requirement.

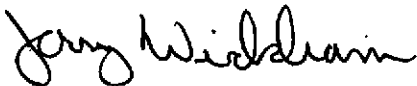
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**AGENCY OVERSIGHT**

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.

Sincerely,



Jerry Wickham, P.G.  
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

Danielle Stefani, 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

Katrin Schliewen, 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