

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

August 6, 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 RO0002952 and Geotracker Global ID SL0600101555, 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 report entitled, "*Groundwater Monitoring Well Sampling Report, Legacy Hanson Site, 3000 Busch Road, Pleasanton, California, SLIC Case RO0002952 and Geotracker Global ID #SL0600101555,*" dated April 29, 2009 and prepared on behalf of Legacy Partners Commercial, LLC (Legacy) by ENV America. The Sampling Report presents results from sampling of well ENV-1, which is located adjacent to the Heavy Maintenance Shop and Lube Shed in Area of Concern (AOC) #3. Well ENV-1 was installed to help evaluate whether a significant source of petroleum hydrocarbons that may affect water quality exists in the area of boring B-1A. Well ENV-1 was sampled in March 2008, March 2009, and April 2009. Total petroleum hydrocarbons as diesel were detected in groundwater from ENV-1 at concentrations up to 81 micrograms per liter during the three sampling events. Based on these findings, ENV America recommended that the monitoring well be abandoned and recommended no further action with respect to groundwater.

ACEH concurs that no additional sampling of ENV-1 is required at this time based on the results obtained from the three sampling events. However, facility closure activities to be performed under regulatory oversight of the Livermore-Pleasanton Fire Department have not been completed. Additional soil sampling in AOC #3 is expected to be required as part of facility closure requirements. Well ENV-1 should not be decommissioned until sampling for facility closure is completed. If subsurface contamination is detected as part of the facility closure activities or investigations, further investigation and/or cleanup may be required under the existing SLIC case for AOC #3. Therefore, well ENV-1 is to be maintained until issues related to the facility closure are complete.

ACEH staff has also reviewed the reports entitled, "*Groundwater Monitoring Report, January 1 through March 31, 2009, SS-123 Area (AOC #8), Radum Facility, 3000 Busch Road, Pleasanton, California (ACEH Case #RO0002952 and Geotracker Global #SL0600101555),*" dated May 11, 2009 and "*Closure Plan for Area of Concern #8, Former Hanson Aggregates Radum Facility, 3000 Busch Road, Pleasanton, California (ACEH Case #RO0002952 and Geotracker Global #SL0600101555),*" dated July 10, 2009. Both reports were prepared on behalf of Hanson

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Aggregates West Region by LFR Inc., The May 11, 2009 Groundwater Monitoring Report presents the results from sampling of wells MW-3 and MW-4, which are located in the area of boring SS123 within Area of Concern (AOC) #8. Four quarters of groundwater sampling have been completed for the two wells. Based on results from the four quarterly groundwater sampling events, the May 11, 2009 groundwater monitoring report recommends that quarterly groundwater sampling be discontinued and that the wells be decommissioned. We concur that groundwater monitoring is to be discontinued for monitoring wells MW-3 and MW-4 in the SS-123 area. However, we request that the two monitoring wells not be decommissioned until agency review and approval of no further action status for AOC #8 is completed.

ACEH case RO0002941 applies to a 15-acre parcel that includes AOC#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. Case closure will not be conducted until facility closure, investigation, and cleanup activities are completed for all areas of concern for each case. However, due to the fact that no further investigation or cleanup is currently proposed for AOCs 4, 5, 6, 7, 8, and 9, ACEH will conduct an agency review to evaluate whether no further action status is appropriate for AOCs 4, 5, 6, 7, 8, and 9.

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**

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

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

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Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (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.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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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, 12th Floor
Emeryville, CA 94608-1827

Voytek Bajsarowicz, ENV America, 244 California Street, Suite 500
San Francisco, CA 94111

Donna Drogos, ACEH
Jerry Wickham, ACEH
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