ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Director

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February 26, 2015

Ms. Tina Lau
Lehigh Hanson West Region
12667 Alcosta Blvd.
San Ramon, CA 94583
(*Sent via E-mail to: Tina.Lau@heidelbergcement.com*)

Mr. Steven Dunn (*Sent via E-mail to: dunn@legacypartners.com*)
Legacy Partners
4000 East Third Avenue, Suite 600
Foster City, CA 94404-4805

Ms. Debra Patterson (*Sent via E-mail to: dpatterson@lionstonegroup.com*)
Lionstone Group
100 Waugh, Suite 600
Houston, TX 77007

Subject: Closure Report Review for SLIC Case RO0002952 and GeoTracker Global ID SL0600101555, Hanson Aggregates Radum Plant, 3000 Busch Road, Pleasanton, CA 94566

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the Site Cleanup Program (SCP) case file for the above referenced site including the document entitled, "*Closure Report, Former Hanson Aggregates Radum Facility, 3000 Busch Road, Areas of Concern 2 through 9, Pleasanton, CA 94566*" dated October 24, 2014 (Closure Report). The Closure Report, which was prepared by Haley & Aldrich on behalf of USL Pleasanton Lakes, L.P., presents results from site characterization, demolition, and excavation in AOC 2 through 5. The Closure Report requests closure of AOC 2 through 9 although the report does not include discussion of AOC 6 through 9. Based on the nature and extent of soil contamination encountered in AOC 2 and 3, we request that a groundwater assessment be completed prior to closure. The technical comments below describe the areas that require a groundwater assessment and request submittal of a Groundwater Assessment Work Plan. As discussed in the technical comments below, we also request that you prepare a Response to Comments that addresses those technical comments below where clarifications or further information have been requested.

ACEH also received a report entitled, "*Closure Report, Former Hanson Aggregates Radum Facility, 3000 Busch Road, Areas of Concern 1 through 9, Pleasanton, CA 94566*" dated December 4, 2014. The December 4, 2014 report was prepared for Livermore-Pleasanton Fire Department (LPFD) to present the results from closure activities that included demolition, removal, and disposal of surface and subsurface features. ACEH defers providing comments on the December 4, 2014 report pending LPFD review of the report.

TECHNICAL COMMENTS

1. **Section 3.1 Idle Truck Maintenance Shop.** Based on the results from previous investigations, no further investigation of the idle truck maintenance shop is requested at this time.

2. **Section 3.1 Discussion of Water Supply Well 3E/1S 15F3.** Section 3.1 indicates that an inactive 640-feet deep water supply well owned by Zone 7 (3E/1S 15F3) was sampled by ENV in February 2007 and the results are presented in Table 35. A review of the ENV America report entitled, "*Additional Soil and Groundwater Investigation Report*," dated February 2007 indicates that the groundwater sample from the non-operational water supply well was collected using a disposable bailer. The depth at which the sample was collected is not reported. In conjunction with the updated well survey requested in technical comment 27, please provide further information on the construction and potential future use of this well.

3. **Section 3.3 Former Idle Truck Maintenance Area between AOC 2 and AOC 3.** The Closure Report indicates that no additional information regarding types or source of wastes in this area is available. Based on the results from previous investigations, no further investigation of the former idle truck maintenance area between AOC2 and 3 is requested at this time.

4. **Section 3.5 AOC 2 Oil/Water Separator.** Characterization sampling, excavation, and confirmation sampling was completed in the area of an oil/water separator formerly located in the northeast corner of the idle truck maintenance shop. Based on the results of the characterization sampling, excavation and confirmation sampling, no further investigation of the former AOC 2 oil/water separator is requested at this time.

5. **Section 3.6 AOC 2 Wash Rack.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a wash rack formerly located east of the idle truck maintenance shop. Based on the results of the characterization sampling, excavation and confirmation sampling, no further investigation of the former AOC 2 wash rack is requested at this time.

6. **Section 3.7 AOC 2 Septic Tank.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a septic tank formerly located south of the wash rack. Based on the results of the characterization sampling, excavation and confirmation sampling, no further investigation of the former AOC 2 septic tank is requested at this time.

7. **Section 3.8 AOC 2 Leach Field.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a leach field formerly located east of the septic tank. Based on the results of the characterization sampling, excavation and confirmation sampling, no further investigation of the former AOC 2 leach field is requested at this time.

8. **Section 3.9 AOC 2 Clay Pipes.** Characterization sampling, excavation and confirmation sampling was completed along clay pipes that extended east and west from the septic tank located east of the idle truck maintenance shop. Based on the results of the excavation

and confirmation sampling, no further investigation of the AOC 2 clay pipes is requested at this time.

9. **Section 3.10 AOC 2 Fuel Line.** An approximately 560-foot fuel pipeline extending south from the idle truck maintenance shop was discovered during a site inspection by Livermore-Pleasanton Fire Department. During removal of the fuel pipeline and associated structures, soil contamination was discovered beneath the fuel pipeline. Total petroleum hydrocarbons as diesel (TPHd) were detected in soil samples collected along the fuel pipeline at concentrations up to 7,800 milligrams per kilogram. Based on soil screening and confirmation samples results, five overexcavation events were conducted along the pipeline. Based on the results of confirmation soil sampling following overexcavation, no further soil removal is requested. However, potential impacts to groundwater have not been fully assessed along or downgradient from fuel-impacted areas of the pipeline. Existing monitoring well MW-10, which is approximately 80 feet downgradient from the fuel pipeline appears to be a useful monitoring well to help assess potential groundwater contamination. Monitoring well MW-10 is screened approximately 44 to 54 feet bgs and groundwater elevations measured in well MW-10 are generally consistent with groundwater elevations in monitoring wells further to the west. Monitoring well MW-5, which is approximately 30 feet downgradient from the fuel pipeline is screened approximately 69 to 74 feet bgs and groundwater elevations measured in well MW-5 are generally not consistent with groundwater elevations in additional monitoring wells to the west. Well MW-5 appears to monitor a lower water-bearing zone and is not used for contouring groundwater elevations across the site. Therefore, well MW-5 provides some information on vertical extent of contamination but has limited value in defining potential horizontal extent of contamination. Monitoring well MW-4 is upgradient from the fuel pipeline and grab sample locations MW-5A and B22 are adjacent to existing wells MW-5 and MW-10, respectively. No other groundwater samples have been collected within 100 feet downgradient along the 560 foot length of the fuel pipeline. However, TPHd was detected at a concentration of 57 micrograms per liter (µg/L) in grab groundwater sample B27, which is approximately 190 feet downgradient from the fuel pipeline and at a concentration of 350 µg/L in grab groundwater sample EB-29, which is approximately 280 feet downgradient from the fuel pipeline. Based on these conditions, we request that further groundwater sampling be conducted to assess the nature and extent of potential impacts to groundwater. Please present plans for this assessment in the Groundwater Assessment Work Plan requested below.

10. **Sections 4.4 and 4.5 AOC 3 Lube Shed and Area East of the Lube Shed.** Characterization sampling, excavation and confirmation sampling was completed in the area of the lube shed, lube shed piping, and trenches east of the lube shed. Based on the results of the characterization sampling, excavation and confirmation sampling, no further investigation or excavation of soil in the lube shed area is requested at this time. However, groundwater sampling should be conducted to assess potential impacts to groundwater. The groundwater investigation should be conducted in conjunction with the groundwater investigation requested in technical comment 16 for the adjacent underground storage tank area. Please present plans for this assessment in the Groundwater Assessment Work Plan requested below.

11. **Section 4.6 AOC 3 Former Aboveground Waste Oil and Waste Antifreeze Tanks.** Characterization sampling, excavation, and confirmation sampling was completed in the area of former aboveground waste oil and waste antifreeze tanks adjacent to the heavy equipment maintenance shop. Based on the results of the characterization sampling, excavation, and confirmation sampling, no further investigation of the former AOC 3 former aboveground waste oil and waste antifreeze tanks is requested at this time.

12. **Section 4.7 AOC 3 Subset Area 2 Former Plant Lube Shed/Warehouse.** Characterization sampling consisting of eight soil borings was completed in the former plant lube shed/warehouse in June 2013. Based on the results of the soil sampling, no further investigation of the AOC 3 subset area 2 former plant lube shed/warehouse is requested at this time.

13. **Section 4.8 AOC 3 Subset Area 2 Former Power Substations.** Characterization sampling consisting of eight soil borings was completed in the areas of two former power substations located in subset area 2 of AOC 3. Based on the results of the soil sampling, no further investigation of the AOC 3 subset area 2 former power substations is requested at this time.

14. **Section 4.9 AOC 3 Transformers.** Three soil borings were advanced in the former transformer areas of AOC 3 to collect soil samples. Based on the results of the soil sampling, no further investigation of the AOC 3 former transformers is requested at this time.

15. **Section 4.10 AOC 3 Storm Drain near Wash Rack.** Section 4.10 discusses a former storm drain inlet that was located near the wash rack in AOC 3. A transite pipe between the wash rack and storm drain inlet was excavated on October 25, 2013. The transite pipe is shown on Figures 9 and 13 of the Closure Report. An outlet pipe from the storm drain apparently leads to an eastern terminus in a drainage area approximately 350 feet east of the storm drain. We request that you include a map showing the eastern terminus of the storm drain in the Response to Comments requested below. During an on-site site visit on October 16, 2013, results from previous sampling at the eastern terminus of the storm drain line were discussed. During our case file review, we were not able to locate results from sampling at the eastern terminus of the storm drain. In the Response to Comments requested below, please include the sampling results for the eastern terminus of the storm drain.

16. **Section 4.12 AOC 3 Underground Storage Tank.** A 1,000-gallon UST was discovered south of the former heavy equipment maintenance building in October 9, 2013 and was removed in December 2013. Excavation activities between January 2, 2014 and April 14, 2014 removed petroleum-impacted soils surrounding the tank. Soil samples collected during the excavation contained up to 17,000 mg/kg TPHd and 37,000 mg/kg TPHmo. No groundwater samples have been collected in the area of or downgradient from the former UST. Therefore, we request that a groundwater investigation be conducted to assess whether releases from the UST have impacted groundwater. Please present plans for this assessment in the Groundwater Assessment Work Plan requested below

17. **Section 4.12.4 AOC 3 Subset Area 2 Abandoned Drums.** Characterization sampling consisting of eight soil borings was completed in the areas where two abandoned drums were formerly located in subset area 2 of AOC3. Based on the results of the soil sampling,

no further investigation of the AOC 3 subset area 2 abandoned drums is requested at this time.

18. **Section 5.1 AOC 4 Former Concrete Batch Plan Area.** Five surface soil samples were collected within the vicinity of the former concrete batch plant. Based on the results of the soil sampling, no further investigation of the AOC 4 former concrete batch plant area is requested at this time.

19. **Section 5.2 AOC 4 Transformer.** One soil boring was completed in the area of a former transformer east of the former concrete batch plant. Based on the results of the soil sampling, no further investigation of the AOC 4 transformer is requested at this time.

20. **Section 6.1 AOC 5 Former Rock Crusher.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a former rock crusher in AOC5. Based on the results of the characterization sampling, excavation, and confirmation sampling, no further investigation of the AOC 5 former rock crusher is requested at this time.

21. **Section 6.2 AOC 5 Former Aboveground Waste Oil Tank.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a former aboveground water oil tank in AOC5. Based on the results of the characterization sampling, excavation, and confirmation sampling, no further investigation of the AOC 5 aboveground waste oil tank is requested at this time.

22. **Section 6.3 AOC 5 Former Rod Mill.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a former rock crusher in AOC5. Based on the results of the characterization sampling, excavation, and confirmation sampling, no further investigation of the former AOC 5 former rod mill is requested at this time.

23. **Section 6.4 AOC 5 Former Plant Lube Shed.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a former plant lube shed in AOC 5. A soil sample collected at a depth of 2 feet bgs from boring FHARF-8-4 contained 4,200 mg/kg TPHd and 12,000 mg/kg TPHmo. The location of boring FHARF-8-4 is listed as not available and is not shown on Figure 8B. In the Response to Comments requested below, please clarify whether the contaminated soils encountered in boring FHARF-8-4 are within the excavation area and were removed or whether they potentially remain on site.

24. **Section 6.5 AOC 5 Former Transformer.** Characterization sampling, excavation, and confirmation sampling was completed in the area of a former transformer in AOC 5. Based on the results of the characterization sampling, excavation, and confirmation sampling, no further investigation of the AOC 5 former transformer is requested at this time

25. **AOC 6 Busch Pit.** AOC 6, the Busch Pit, was not discussed in the Closure Report; however, the Closure Report requests closure of AOC 6. In correspondence dated April 30, 2012, ACEH requested a Work Plan to install three groundwater monitoring wells around the periphery of the Busch Pit to confirm that discharges to and infilling of the Busch Pit have not impacted groundwater. In correspondence dated June 22, 2012, Haley & Aldrich on behalf of USL Pleasanton Lakes, L.P., requested a delay in the decision to install three monitoring well until after completion of backfilling of the Busch Pit. ACEH agreed to

hold the decision in abeyance until completion of filling of the Busch Pit. We received notification of the completion of backfilling and hydroseeding of the exposed surface in correspondence from Haley & Aldrich dated October 18, 2013. In the Response to Comments below, please provide further information on the final grade of the Busch Pit with respect to the surrounding area, the type of surface cover, and discussion of the degree of compaction and whether subsidence of the surface is expected over time.

26. AOC 7 Boring SS-31 Area. AOC 7 was not discussed in the Closure Report; however, the Closure Report requests closure of AOC 7. Based on review of previous investigation results, no further investigation of AOC 7 is requested at this time. However, ACEH would like to conduct a site inspection of the SS-31 area prior to concurrence with the no further action request.

27. AOC 8 Boring SS-123 Area. AOC 8 was not discussed in the Closure Report; however, the Closure Report requests closure of AOC 8. Based on results of groundwater monitoring conducted at the site in 2008 and 2009, ACEH concurred that groundwater monitoring could be discontinued. However, a review of previous investigation results indicates that TPHd and TPHmo were detected at concentrations up to 1,500 and 5,000 mg/kg in soil samples collected at a depth of 2 feet bgs. Shallow soil in the AOC 8 area does not appear to meet the cleanup criteria for the site. Please review AOC 8 and present a summary of the site along with recommendations for future actions in the Response to Comments requested below.

28. AOC 9. No further investigation of AOC 9 is requested at this time. However, ACEH would like to conduct a site inspection of the AOC 9 area prior to concurrence with the no further action request.

29. Updated Well Survey. We request that you complete a well survey that includes review of all water supply wells within 2,000 feet of the site. We recommend that you obtain well information from both the Zone 7 Water Agency and the State of California Department of Water Resources. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please provide a table that includes the well designation, location, total depth, diameter, screen interval, date of well installation, current status, historic use, and owner of the wells. In addition, please provide well logs and completion records for wells downgradient from the site that are potential receptors. Please present the updated well survey in the Groundwater Investigation Work Plan requested below.

30. Omissions or Editorial Comments. The Confirmation Sample Locations with results that are above action level criteria are not labeled on Figure 12. Please include a copy of Figure 12 that identifies those locations exceeding criteria in the Response to Comments requested below. The legend for Figure 13 indicates that the red triangle depicts locations with results that are below action level criteria. We were not able to find results for sample location 3-EX2-B8 in Table 24.

TECHNICAL REPORT REQUEST

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

- **April 30, 2015** – Response to Comments
  File to be named: CORRES_yyyy-mm-dd RO2952

- **April 30, 2013** – Groundwater Assessment Work Plan
  File to be named: WP_R_yyyy-mm-dd RO2952

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

Sincerely,

Jerry Wickham

Digitally signed by Jerry Wickham
DN: cn=Jerry Wickham, o=Alameda County Environmental Health, ou, email=jerry.wickham@acgov.org, c=US
Date: 2015.02.26 18:24:26 -08'00'

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

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Danielle Stefani, Livermore Pleasanton Fire Department, 3560 Nevada St, Pleasanton, CA 94566 (*Sent via E-mail to: dstefani@lpfire.org*)

Colleen Winey (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (*Sent via E-mail to: cwiney@zone7water.com*

John Rigter, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566 (*Sent via E-mail to: jrigter@lpfire.org*)

Jim Green, Haley & Aldrich, 2033 North Main Street, Suite 309, Walnut Creek, CA 94596 (*Sent via E-mail to: JGreen@haleyaldrich.com*)

Voytek Bajsarowicz, Haley & Aldrich, 2033 North Main Street, Suite 309, Walnut Creek, CA 94596 (*Sent via E-mail to: VBajsarowicz@haleyaldrich.com*)

Jonathan P. Lowell, City Attorney, City of Pleasanton, P.O. Box 520, Pleasanton, CA 94566 (*Sent via E-mail to: jlowell@ci.pleasanton.ca.us*)

Jerry Wickham, ACEH *(Sent via E-mail to: jerry.wickham@acgov.org)*

GeoTracker, e-File

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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 GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	**REVISION DATE:** May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection**.
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted**.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

  RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

1) Obtain User Name and Password
   a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
      i) Send an e-mail to deh.loptoxic@acgov.org
   b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for**.

2) Upload Files to the ftp Site
   a) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
      (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
   b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
   c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
   d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
   e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
   a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
   b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
   c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
   d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.