



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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August 25, 2015

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Mr. Steven Dunn (Sent via E-mail to: [dunn@legacypartners.com](mailto:dunn@legacypartners.com))  
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Ms. Debra Patterson (Sent via E-mail to: [dpatterson@lionstonegroup.com](mailto:dpatterson@lionstonegroup.com))  
Lionstone Group  
100 Waugh, Suite 600  
Houston, TX 77007

Subject: Work Plan 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 recently submitted document entitled, "Response to ACEH Comments on Closure Report and Groundwater Assessment Work Plan, Former Hanson Aggregates Radum Facility, 3000 Busch Road," dated July 14, 2015 (Work Plan). The Work Plan, which was prepared by Haley & Aldrich on behalf of USL Pleasanton Lakes, L.P., presents responses to technical comments in ACEH correspondence dated February 26, 2015 and includes plans for a groundwater assessment.

Based on our review of the Work Plan, we request that you submit a Revised Work Plan no later than October 14, 2015 that addresses the technical comments below.

### **TECHNICAL COMMENTS**

- 1. Technical Comment No. 2. Discussion of Water Supply Well 3E/1S 15F3.** The response in the Work Plan to our previous comment regarding water supply well 3E/1S 15F3 indicates that the well is owned by USL Pleasanton Lakes, L.P. but does not provide additional information regarding construction or use of the well. Therefore, please assume for assessment of human health risks that the water supply well will be used in the future and may be a receptor for any groundwater contamination at the site.
- 2. Technical Comment No. 15. 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. 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. ACEH requested that you include a map

showing the eastern terminus of the storm drain and sampling results for the eastern terminus of the storm drain. The response in the Work Plan indicates that sampling results from the eastern terminus of the storm drain could not be located but that field staff inspected the area and did not note evidence of potential impacts. In the Revised Work Plan requested below, please include sampling at the eastern terminus of the storm drain to confirm that the drainage area is not impacted.

- 3. Technical Comment No. 278. AOC 8 Boring SS-123 Area.** ACEH requested a review of AOC 8 with presentation of a summary of the site along with recommendations for future actions. The Work Plan includes one table with shallow soil results and the attachment of previous reports in the attachments. The Work Plan indicates that the detections of elevated concentrations of petroleum hydrocarbons as diesel (TPHd) and TPH as motor oil (TPHm) in shallow soil are related to the presence of asphaltic material in the soil samples. The intended purpose of the requested review was to review all data for the site in order to evaluate whether the site presents any risks to human health or the environment.

ACEH has reviewed available documents in the case file and it appears that asphaltic materials were placed at the site with other fill material following mining of the site. It is not clear whether the detections of petroleum hydrocarbons at AOC 8 are due only to asphaltic materials in the samples or whether other wastes containing petroleum hydrocarbons were also added to the fill. A review of results from boring SS(123), which was the first boring advanced in AOC 8 (ENV America February, 2007), indicates that TPHd and TPHm extend to the bottom of the boring at 40 feet bgs. No mention of asphaltic material is included on the SS(123) boring log. TPHd and TPHm were detected in all soil samples collected from four soil borings advanced in AOC 8 on March 8, 2007 at concentrations ranging from 14 to 4,200 milligrams per kilogram (mg/kg) and 68 to 14,000 mg/kg, respectively (ENV America April 2007). TPHd was detected in grab groundwater samples at concentrations ranging from 200 to 380 micrograms per liter ( $\mu\text{g/L}$ ). Asphaltic materials were noted at varying depths in the boring logs. Four additional step-out soil borings were advanced at the site in July 2007. TPHd and TPHm were detected in soil at concentrations up to 170 and 1,500 mg/kg, respectively. TPHd was detected in two of the four grab groundwater samples collected at concentrations of 340 and 990  $\mu\text{g/L}$ . Asphalt was described at several depths in the soil borings (LFR October 26, 2007). Six additional step-out soil borings were advanced in AOC 8 in May 2008 with two of the soil borings converted into monitoring wells (LFR June 20, 2008). TPHd and TPHmo were detected in soil at concentrations up to 220 and 2,300 mg/kg, respectively. Groundwater samples were collected from the two monitoring wells during four quarterly sampling events from June 2008 to March 2009. TPHd was detected at concentrations above the reporting limits in only one groundwater sample from the deeper well, MW-3. Based on quality control concerns, the validity of the detection on TPHd in groundwater from well MW-3 was questioned.

Some confirmation that the detections of petroleum hydrocarbons in AOC 8 are related to asphaltic material is needed and some characterization of the types of mining wastes that were placed at the site are needed. Trenching to expose the mining waste at AOC 8 and focused sampling within and outside observed asphaltic materials is needed. We request that you include these plans in the Revised Work Plan requested below.

4. **Revised Figure 12 in Attachment 5.** Figure 12 in the Closure Plan did not include sample designations for those samples that were above action level criteria. Therefore, the concentrations at those locations were unknown. In our February 26, 2015 correspondence, ACEH requested that the Work Plan include a copy of Figure 12 that identifies those sample locations that are above screening criteria so that the locations of the most significant releases would be apparent based on a comparison to data in the tables. This information was to be used in selecting groundwater sampling locations. Figure 12 in Attachment 5 of the Work Plan deleted all locations that were above action level criteria. In the Revised Work Plan requested below, please include a Revised Figure 12 that includes sample designations for all sample locations.
5. **Revised Figure 13 in Attachment 5.** The legend for Figure 13 continues to indicate that both the green and red symbols represent sample locations that are below action level criteria. The red symbols actually represent sample locations that are above action level criteria.
6. **Proposed Sampling Locations in Former UST Area.** Please include one additional boring location northwest of the former UST and one additional boring northwest of the lube shed in AOC3.
7. **Proposed Sampling Locations in Former Fuel Line Area.** We reserve comments on proposed sampling locations in the Former Fuel Line Area until all sampling locations can be confirmed on a Revised Figure 12.
8. **Proposed Groundwater Sample Analysis.** Please include analysis for volatile organic compounds using EPA Method 8260.

#### **TECHNICAL REPORT REQUEST**

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

- **October 14, 2015** – Revised 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](mailto: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, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Responsible Parties  
RO0002952  
August 25, 2015  
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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](mailto: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](mailto:cwiney@zone7water.com))

John Rigter, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566 (Sent via E-mail to: [jrigter@lpfire.org](mailto: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](mailto: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](mailto: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](mailto:jlowell@ci.pleasanton.ca.us))

Jerry Wickham, ACEH (Sent via E-mail to: [jerry.wickham@acgov.org](mailto: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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.