R02811

Linda S. Adams
Secretary for
Environmental Protection

Department of Toxic Substances Control

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Berkeley, California 94710-2721

Arnold Schwarzenegger
Governor

December 13, 2006

Larry Mencin
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115

Dear Mr. Mencin:

DTSC has completed its review of the revised Treatability Study Work Plan for Laboratory Screening Studies, Sherwin-Williams Site, 1450 Sherwin Avenue, Emeryville, California prepared by Camp Dresser & McKee Inc. (CDM) and dated November 22, 2006. Additional information was provided in the Addendum to Treatability Study Work Plan for Laboratory Screening Studies, Sherwin-Williams Site, 1450 Sherwin Avenue, Emeryville, California prepared by CDM and dated December 8, 2006. The Work Plan is approved, as clarified by the Addendum, with the following clarifications and modifications:

GENERAL COMMENTS:

1. All cuttings and decontamination water containerized in 55-gallon drums must be characterized upon completion of this sampling event for proper disposal.
2. All borings should be logged in accordance with DTSC's Drilling, Coring, Sampling and Logging at Hazardous Substance Release Sites guidance. This guidance is located on DTSC's website at: http://www.dtsc.ca.gov/SiteCleanup/upload/SMP_Drilling_Coring_Sampling_Logging.pdf

SPECIFIC COMMENTS

1. Page 2-5, Decision Rule 3. If the test results are not representative, then additional steps must be taken to determine the cause. If necessary, additional groundwater samples may be collected to run the test successfully. The subsequent report shall specify what additional steps, if any, were taken.
2. Pages 2-5 and 2-6, Section 2.2.1. As a clarification, samples of each lithologic unit will be collected for analysis. The subsequent report shall specify how soil samples were selected for arsenic speciation analysis.

3. Page 2-8, Section 2.2.2, Process Option Testing. The treatability study proposes laboratory tests to evaluate the ability of specific materials to treat arsenic in the groundwater underlying the Site. If a specific material is shown to be applicable to the site conditions, the Feasibility Study Report shall contain the supporting rationale and documentation to support its implementation in a specific location.
4. Page 2-9 and 3-3, Field Sampling Plan.
   a. As clarified by Sherwin-Williams' consultant during the December 6, 2006 meeting, groundwater wells will be purged until water quality parameters (pH, temperature, and conductivity) stabilize prior to initiation of sample collection for treatability testing.
   b. Groundwater samples collected will be collected, preserved and transported in accordance with the procedures discussed in this Work Plan, as well as those discussed in the Quality Assurance Project Plan for this Site.
5. Page 2-9, Test Set-Up. Sources of backfill material vary widely. As clarified by Sherwin-Williams' consultant during the December 6, 2006 meeting, backfill material used in these tests is expected to be available in the future in quantities that may be required as part of a cleanup action.
6. Section 2.3. If a specific technology is able to address arsenic in the groundwater, the recommendations for Phase II testing should also consider the potential of materials to interact with organic and inorganic constituents in soil within the saturated zone.
7. Page 3-1, Paragraph 1. DTSC understands that some assumptions have to be made to evaluate this technology and its applicability at this Site. The Work Plan assumes a 10,000 square foot treatment area for evaluating this technology. If this technology is suitable as part of a remedial action alternative, the Feasibility Study Report must provide the criteria and sampling data used to define the treatment area.
8. Page 3-2, Decision Rule 3. DTSC recognizes that criteria are necessary for evaluating whether it may be appropriate to consider a technology further. However, DTSC would like to clarify that its approval of this Work Plan does not mean that it concurs that mobilizing contaminants 20% above their baseline concentrations would be acceptable as part of a final remedy. This would need to be considered and compared to the effects of other options as part of the feasibility study process.
9. Page 3-3, Section 3.2.1. If the permeability of the lithologic units between the sand and gravel units discussed is not equivalent to 1.0E-08 cm/sec, the ability of the grout material to penetrate these units may also need to be assessed as this may affect the ability of the grout injection to achieve the desired permeability rating for the saturated zone soils.

10. Page 3-5, Section 3.3.4. As discussed during the December 6, 2006 meeting, Sherwin-Williams will install the three wells within the raised cap area to obtain the soil samples required for the Phase II testing.
11. Section 3.3, Phase III Testing. DTSC will need to review the results of the Phase II testing prior to approving implementation of the Phase III testing (pilot testing). Since ground surface upheaval is a criterion for discontinuing grout injection, plans must be submitted along with the Phase II results to address this potential occurrence as it would impact the integrity of the raised cap.

If you have any questions, please contact Janet Naito of my staff at (510) 540-3833 or jnaito@dtsc.ca.gov.

Sincerely,

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