

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

1730 So. Amphlett Blvd., Suite 320
San Mateo, California 94402
(415) 578-1172
Fax (415) 578-9131

19 November 1996

Mr. Sumadhu Arigala
California Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

ENVIRONMENTAL
PROTECTION

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Subject: Comments on Work Plan for Sample Collection and Laboratory Analysis of Building Material and Precipitate on a Portion of the Rifkin Property 4525 to 4563 Horton Street, Emeryville, CA (EKI 930028.82)

Dear Mr. Arigala:

On behalf of our client, Chiron Corporation, Erler & Kalinowski, Inc. ("EKI") has prepared these comments on the subject Work Plan prepared by Levine-Fricke-Recon ("LFR") for Sherwin-Williams Company. The LFR Work Plan, dated 7 November 1996, was discussed at our meeting on 13 November 1996 at your offices with representatives of Sherwin-Williams, Chiron, LFR, EKI, the Regional Water Quality Control Board, and the Alameda County Department of Environmental Health. Our comments from that meeting regarding this work plan are summarized briefly below.

Regarding Task 1 on page 1, collection of "background" samples is planned at two other wall locations, away from the south wall sampled previously by EKI, within the former Rifkin building at 4525 Horton Street. As we noted during the meeting, considering the friable nature of the precipitate or residue on the south wall, the length of time the residue may have been present in the building, and the possibility of past dust migration from the Sherwin-Williams property, it is possible that contaminated dust may have deposited on other surfaces within the building. Therefore, following receipt and evaluation of the proposed sampling results, additional sampling of other walls and surfaces, perhaps including wipe samples to distinguish dust from paint, may be appropriate. Such additional sampling may aid identification of arsenic contaminated areas within the former Rifkin building if this "background" sampling finds indications of elevated arsenic concentrations elsewhere in the building.

Regarding proposed sampling of the exterior of the southern Rifkin wall facing Sherwin-Williams, it was recommended at the meeting that interior samples also be collected at the

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corresponding locations. The exterior areas have been exposed to decades of weathering and washing by rains that could have removed precipitate or residue. I believe that Sherwin-Williams agreed to perform the interior sampling at these locations as well. Also, we note on page 2 the Work Plan states that exterior samples will be taken at 18 feet above external grade, but Figure 2 shows the location to be 8 feet above grade. As discussed in the meeting, we understand the proposed locations to be 8 feet above external grade, although information, if any is available, on the height of the former acid plant building and internal structures may be pertinent in determining appropriate sampling heights.

Finally, consideration of performing TCLP analyses on some samples of wall materials may also be appropriate for purposes of classification of the wall debris for off-site disposal.

If you have any questions, please contact us.

Very truly yours,

ERLER & KALINOWSKI, INC.



Thomas W. Kalinowski, Sc.D.
Vice President

cc: Mr. Stephen Morse, California Regional Water Quality
Control Board
Dr. Ravi Arulanantham, California Regional Water Quality
Control Board
Mr. Dennis Mishek, California Regional Water Quality
Control Board
Ms. Susan Hugo, Alameda County Department of
Environmental Health
Mr. Ric Notini, Chiron Corporation
Mr. Dave Gustafson, Sherwin-Williams
Mr. Larry Mencin, Sherwin-Williams
Mr. Mark Knox, Levine-Fricke-Recon
Mr. Edward Sangster, Esq., McKenna & Cuneo