



Cal/EPA

Department of  
Toxic Substances  
Control

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ENVIRONMENTAL  
PROTECTION

October 20, 1997 97 OCT 31 AM 8:33



Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

Mark Johnson  
California Regional Water Quality Control Board  
San Francisco Bay Region  
2101 Webster Street, Suite 500  
Oakland, California 94612

Dear Mr. Johnson:

**Work Plan for Site Investigation  
Sherwin-William Facility, Emeryville, California**

The Department of Toxic Substances Control (DTSC) has reviewed the Work Plan for Site Investigation, Sherwin-William Facility, Emeryville, California, dated June 2, 1997 and prepared by Levine-Fricke-Recon.

Based on our review, we have the following comments:

1. Objectives (Section 1.2) on page 2: The data to be obtained from this work plan will define the nature and extent of contamination at the Site. Subsequently, based on these data, a Feasibility Study needs to be performed for various remedial alternatives which will require a risk assessment analysis.
2. Evaluation of human-made conduits (Section 3.2.1) on page 7: The abandoned sewer line on the west side of the Site (across the underneath of the existing railroads and toward Myers and Barbary coast sites ) should also be evaluated.
3. Risk Management Plan (Section 4.2) on page 20: The data collected from this site investigation should be used to perform a Feasibility Study for the final selection of the remedial alternative (see item #1). A risk assessment analysis should be performed before a risk management plan can be developed.

In addition, based on the results of the field data, the effectiveness of the previously implemented Interim Remedial Measures (slurry wall, cap and storm-water collection system, and groundwater extraction and treatment system) need to be evaluated.

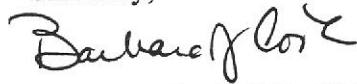


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4. In Figures 3 through 7, identify each different property. Also, identify the BGR property in Figure 3.
5. The railroad ballast sampling locations should be shown in Figure 4.

If you have any questions concerning this letter, please call Ted Park of my staff at (510) 540-3805.

Sincerely,



Barbara J. Cook, P.E., Chief  
Northern California - Coastal  
Cleanup Operations Branch

cc: Mark D. Knox  
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