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Project No. 326903

July 16, 1998

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

Re: Response to comments on ENTRIX's Draft QAPP for Sherwin-Williams Emeryville Facility and Addendum

Dear Mr. Johnson:

As set out in the Regional Water Quality Control Board (RWQCB) Order 98-009, ENTRIX, on behalf of Sherwin-Williams, is providing the attached set of comments as an Addendum to the ENTRIX Draft Quality Assurance Project Plan for the Site Investigation of the Sherwin-Williams Facility, Emeryville, California, April 30, 1998 (Draft QAPP). The attached Addendum contains ENTRIX's response to the review comments provided by the Department of Toxic Substances Control (DTSC). The comments provided by Chiron pertaining to sampling frequency and detection levels for chlorinated compounds appear to be more relevant for the Work Plan.

Due to the proposed changes in the relationship between the Consultative Work Group (CWG) and Sherwin-Williams, the CWG will be a participant in the review of the Current Conditions Report, the analysis of data gaps, and the general development of the Site Investigation Work Plan Addendum. As we discussed in our July 9, 1998 CWG meeting, this process will help expedite the remedial efforts. ENTRIX and Sherwin-Williams anticipates that this process will lead to the need to revise the QAPP. The revisions will account for different personnel conducting the investigation or inclusion of additional analytes that may be identified during the data gaps analysis.

In order to move the process forward, Sherwin-Williams has proposed to initiate the site investigation work on the Rifkin Property, as scheduled (August, 1998). It is proposed that this phase of the investigation be conducted under the current Work Plan and the April 30, 1998 QAPP as amended by the attached response to comments. It is anticipated that the initiation of the amended Work Plan, produced in consultation with the CWG,

will occur sometime in October 1998. Depending on the degree of changes developed through the CWG process, the April 30, 1998 QAPP may have to be revised.

If you have any questions, please contact me directly.

Sincerely,

ENTRIX, Inc.

Bob Haddad cjm

Robert I. Haddad, Ph.D.
Senior Consultant

RIH/cjm

DRAFT

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MEMO

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To: Bart Simmons, Ph.D., Chief
Hazardous Materials Laboratory
Department of Toxic Substances Control
2151 Berkeley Way, Room 515
Berkeley, CA 94704

From: Linda DeMartino
Robert I. Haddad, Ph.D.

Date: July 14, 1998

Re: Response to May 21, 1998 DTSC Review Comments QAPP for Sherwin-Williams Facility, 1450 Sherwin Way, Emeryville, California

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Thank you for your May 21, 1998 Memorandum providing a review of the April 30, 1998 Draft Quality Assurance Project Plan (QAPP) for the Site Investigation of the Sherwin-Williams Facility, Emeryville, CA. The comments below are offered in response to your review, and were developed from our phone conversations with you and your staff, as well as our feeling for the data needs of this project.

Based on recent developments within the project and on a change in approach within the Consultative Work Group (CWG), it is almost certain that Sherwin-Williams will substantially revise and amend the Draft QAPP. During the next 4 to 6 weeks, the CWG will jointly review the Current Conditions Report (CCR) and identify potential data gaps. This information will be used to develop amendments to the current Work Plan for this site. Sherwin-Williams hopes that this more cooperative process will enhance the overall process and move us all more quickly through the RI/FS process.

It is ENTRIX's belief that this process may result in the need for a revision of the QAPP. The reasons for this revision fall into two categories: (1) anticipated changes in the project team and (2) data type differences identified during the data gaps analysis. We understand that the revised QAPP will need to be reviewed by DTSC and hope that the responses provided below will serve to minimize the comments DTSC will have in their review of the revised QAPP. If no significant changes come out of the data gaps analysis process, we anticipate using the existing QAPP as amended by the comments presented below.

In keeping with time schedules outlined in the Regional Water Quality Control Board Order 98-009 and with the new approach being considered by the CWG, Sherwin-Williams and Levine Fricke Recon (LFR) will be initiating field work on the Rifkin

Comment 2: Section 2.6.3, Laboratory Records

Response: The QAPP will be revised to reflect that all raw data associated with analysis is maintained by the laboratory for seven years (Tape data for one year). Raw data is available upon request within those seven years.

Comment 3: Section 3.4.1, Analytical Methods

Response: Quanterra is currently preparing to convert to the method described in SW-846, Update III by the end of June 1998. This updated method will be incorporated into the revised QAPP.

Comment 4: Section 3.4.2, Reporting Limits

a) MDLs and RLs

Response: The following comment will be incorporated into the revised QAPP - *"results will be qualified as below the quantitation limits whenever MDLs are used."*

b) Page 3-23

Response: ENTRIX understands that the reporting limits (RLs) and method detection limits (MDL) for individual polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270 are above the groundwater benchmark criteria. However, ENTRIX believes that the RLs and MDLs for individual PAHs in soil are adequate compared to soil benchmark criteria. Further, based on existing data, PAHs do not appear to be substantial contaminants at this site. Thus, considering the nature of the primary contaminants (metals) and the fact that the larger, carcinogenic PAHs are fairly insoluble in water, ENTRIX feels that it would be unreasonable to add the expense of Single Ion Mass Monitoring/GC/MS (SIMM/GC/MS) for every water sample analyzed for PAHs. Rather, ENTRIX proposes that we use the soil data to determine if individual PAHs are a concern at a particular sampling location. If these individual PAHs are found in the soil samples and not in the groundwater at the routine RL and MDL, then the use of SIMM/GC/MS will be re-evaluated based on those results.

Comment 5: Section 3.10.3, Data Validation

Response: The standard data deliverable (Level I) from the laboratory and data validation currently proposed is designed to catch the common error that may occur during sample analysis and reporting. These errors would include missed holding times, incorrect analysis performed, deficiencies in quality control parameter, and blank contamination. A more extensive data review is proposed for 5% of all samples. The data deliverables for this review would be a Level III which would provide further confirmation of the quality of the sample analysis.

The validation of the quantitative determination of individual analytes as requested in the DTSC comments would require the reconstruction each analytic

result. Reconstruction of an analytic result would require a Level IV deliverable package from the laboratory which includes the calibration curve, retention time or instrument tuning, raw data for each associated method blank, spike, and sample for each method, all preparation logs, and instrument run logs. A Level IV data package costs an additional 5% more than a Level III, and requires approximately two to three times the hours required to validate a Level III.

We agree that a Level IV validation could reveal additional error that may occur during the sample analysis and reporting that would not be identified during a Level III review. However, given the nature of the Sherwin-Williams Emeryville Facility Project, it is ENTRIX's opinion that a Level III validation will be stringent enough for this project.

Comment 6: Data Storage and Retrieval.

Response: The following information will be included in the revised QAPP. Quanterra stores the current (approximately the last three months) record on-site in a lock storage room. Records older that three months are store at an off-site storage management facility. This facility is secured with access limited to key personnel within the laboratory.

Comment 7: Assessment of Laboratory Operations

Response: LFR is currently auditing Quanterra for other projects unrelated to Sherwin Williams. These audit data are available. LFR would be willing to include a double blind performance evaluation samples with the existing audit program.

The following provides a response to comments received from Drs. Brown and Underwood as presented by DTSC in Letter dated May 20, 1998.

Comment 1: Storage of consumables, and QA/QC procedures for storage

Response: The following will be noted in the amended work plan. Sample bottles and coolers will be shipped to the site from the laboratory daily. A separate storage facility at the office for bailers, gloves, etc., is in a locked area and separate from vehicular traffic.

Comment 2: GIS Package

Response: The GIS package that will be used for this project will be ArcView.

Comment 3: Independent Validator

Response: The independent validator will be a sub-contractor to LFR. The validator has been selected based on expertise and experience.