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CALIFORNIA DEPARTMENT OF HEALTH
SERVICES

ENVIRONMENTAL HEALTH INVESTIGATIONS BRANCH
5900 HOLLIS ST., SUITE E - ANNEX 10
EMERYVILLE, CA 94608



Date:

1/26/98

Number of pages including cover sheet:

4

To:

Mark Johnson
SFBARWQCB

Phone:

Fax phone: 286-1380

CC:

From:

Reber Brown

Phone:

(510) 450-3818

Fax phone:

(510) 450-3773

REMARKS:

Urgent

For your review

Reply ASAP

Please comment

Comments on work plan and Tentative order
for Sherwin Williams. Please call Jane Riggsan or
I if you have questions.

Reber

DEPARTMENT OF HEALTH SERVICES2151 BERKELEY WAY
BERKELEY, CA 94704-1011

(510) 450-3818

January 26, 1998

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

Subject: Comments on Work Plan for Site Investigation - The Sherwin-Williams Facility
(6/2/97) and Notice of Tentative Order (12/22/97)

Dear Mr. Johnson,

At the first meeting of the Consultative Work Group for the Sherwin-Williams Site, it was decided that the tentative Site Cleanup Requirement Order would be held over until the February meeting. This was to allow members of the Consultative Work Group time to review the Tentative Order and the June 2, 1997 Work Plan which several of us had not seen. We agreed to get these comments to you by January 26, 1998. Consequently, below you will find our comments regarding the Tentative Order and the Work Plan.

Comments on Work Plan for Site Investigation - The Sherwin-Williams Facility (6/2/97)

1. Section 1.2 states that arsenic concentrations on the site will be compared to those on adjacent properties to evaluate risk management strategies.

Given that lead arsenate pesticides were produced at the site, why isn't lead being determined as well?

Given the potential for extensive contamination in the area, is it wise to use levels of arsenic adjacent to the site as background?

2. There is no discussion of what chemicals have been used historically at the Sherwin-Williams Facility or at any of the facilities on adjacent properties, nor is there any discussion of what chemicals are being currently used at any of the properties in the Site. There is also no discussion of the production processes used, either currently or historically.

Based on such a review, what other chemicals should be determined on- and off-site, in the soils and in the ground water?

3. There is no discussion of the direction of flow of the ground water in the area, nor is there any discussion of whether there is contamination at any of the properties to the south of the

Sherwin-Williams Facility. What investigations have been carried out in the areas south of the Sherwin-Williams Facility?

4. Has the remediation of the Horton Street soils been completed? Has there been any follow up sampling to determine whether the remediation is complete?
5. The only discussion of chemical analysis to be conducted on soil and water samples is in section 3.6 Site Investigations - Southern Area. This section indicates that standard EPA methods will be used.

If chemicals that were or are being used at the site are not one of the target analytes, then the analysis may very well miss them. A historical review of chemicals previously and currently being used must be carried out to ensure that the analytical methods used will detect all contamination.

Extensive sampling and analysis of both soils and ground water should be carried out across the entire site, at the surface and at various depths below ground surface, to fully characterize the extent of contamination. Barring evidence to the contrary, this sampling should include the area south of the Sherwin-Williams Facility.

6. There is no discussion of the effectiveness of the interim remedial measures, nor any indication of what permanent remedial measures may be implemented.

Comments on Notice of Tentative Order (12/22/97)

1. Page 2 - Remedial Investigation. states that several voluntary soil and ground water remedial investigations have been carried out for the Sherwin-Williams property. What specific chemicals have been discovered, where, and at what concentrations?
2. Page 3 states that amendments and clarifications to the 6/2/97 work plan were submitted to the Executive Officer (9/10/97). What was contained in these amendments? We do not have a copy of this document.

This paragraph also discusses the identification of a task for evaluating current site conditions (Scope of Work -Section 3.1.2 of the Work Plan), including a review of historical reports and data. Such a review should include all areas of the site, should address what chemicals were used, how they were disposed of, etc., and should also include a discussion and summary of the sampling plan, the analytical methods used, and quality assurance/quality control data.

3. Page 4 - Adjacent Sites. This section states that "Industrial companies that historically operated outside of the Sherwin-Williams property may be potential sources of contamination found on portions of the site." It is not clear whether this has been investigated.
4. Page 4 - Public Participation. How will the Public Participation Plan be developed? Who will review and comment on the Plan?

01/26/98 10:00
Mark Johnson
January 26, 1998
Page 3

If the main objective of the Plan is to have tenants and concerned parties genuinely involved in the site investigation and remediation process, then it is imperative that the plan be completed in a timely fashion to ensure community review of investigation and remediation activities outlined in the Tentative Order. However, if a plan is to be submitted 30 days after the order is signed, it is difficult to get input on the plan.

5. Page 5 - Other Board Policies. When did Sherwin-Williams receive its NPDES permit, and who reviewed the application? Is such an application available for public review?
6. Page 8 - B. Tasks 3. Will the remedial investigation contain a baseline risk assessment? Has a baseline risk assessment already been prepared?
7. Page 8 - 9 - B. Tasks 3 - 6. Will these technical reports be reviewed by the Consultative Work Group? Will the Public Participation Plan allow for review of these reports?
8. Page 10 - Document Distribution. Add to the list "g. Others identified in the Public Participation Plan."

In general, we feel that these documents are lacking in details which we feel we need to adequately review the work being planned at the Site. We would like to see these issues adequately addressed before we review them again.

We appreciate the opportunity to review these documents, and look forward to continuing involvement with the Consultative Work Group.

Sincerely,



F. Reber Brown, Ph.D.
Research Scientist
Environmental Health
Investigations Branch



Jane Riggan, MSW
Public Health Social Worker Consultant
Environmental Health
Investigations Branch

Toxics Assessment Group

RESEARCH · AND · CONSULTING · SERVICES

PO BOX 73620
DAVIS CA 95617-3620

tag@dcn.davis.ca.us

TELEPHONE 530/753-0277
FAX 530/753-5318

Mara
Mark Knox
FAX TRANSMITTAL

TO: ~~Mark Johnson~~, RWQCB - 510/286-3981

FROM: Jody Sparks, TAG - 707/785-3192 (ph); 707/785-3024 (fax)

DATE: 1/26/98

PAGES: 13

SUBJECT: Sherwin-Williams Site; Comments on document titled Workplan for the Sherwin-Williams Public Participation Plan received from Mara Feeney and Associates on 1/5/98 and TAG's attachment pages A-1 through A-8

COMMENT: Please call and confirm receipt of this document. Thank you.

98 FEB -3 AM 9:39
ENVIRONMENTAL
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Toxics Assessment Group

RESEARCH · AND · CONSULTING · SERVICES

PO BOX 73620
DAVIS CA 95617-3620

tag@dcn.davis.ca.us

TELEPHONE 530/753-0277
FAX 530/753-5318

January 26, 1998

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

VIA FAX TRANSMITTAL

RE: Sherwin-Williams Site; Comments on *Workplan for the Sherwin-Williams Public Participation Plan* received from Mara Feeney and Associates on 1/5/98

Dear Mr. Johnson,

The Toxics Assessment Group (TAG), on behalf of the 45th Street Artists' Cooperative, offers the following comments regarding the above referenced document. TAG has also attempted to incorporate comments communicated to us formally and informally by individual Coop residents, who may also choose to submit their own comments. We have organized the comments beginning with general observations and questions, followed by specific comments.

GENERAL OBSERVATIONS AND QUESTIONS:

- The Draft Workplan for the Public Participation Plan (Public Participation Workplan) is only an outline of tasks. TAG is not certain if this is the normal and accepted process. Other Public Participation Workplans that TAG has reviewed contain more of a narrative discussion. TAG will limit our comments on the Draft Public Participation Workplan, since there is the assurance based both the Tentative Order and agreement reached in the AB 2061 hearing, stipulating that the Public Participation Plan must meet the Department of Toxic Substances Control (DTSC) Public Participation Guidance document which is based in part on the USEPA guidance document. Hopefully the DTSC's Public Participation staff have had an opportunity to review the document and determine if the document meets the requirements. Rather than reiterate portions of the DTSC's Public Participation Plan in these comments, TAG has selected to provide specific portions of the DTSC Public Participation Guidance document relative to

the outline of the Workplan, including: 1) Public Participation Outline [pp. 700-20-8 through 700-20-11]; Community Interviews Overview and Timing [pp. 700-13-1 through 700-13-6]; and List of Individuals and Organizations to Interview [p. 700-13-7]. TAG incorporates these portions of the Public Participation Plan Guidance document by reference into our comments.

- The Public Participation Plan is a document for the community. The community must have an opportunity to review, comment, and hopefully reach consensus as to the intent, objectives, and the communication component of the document. This is not reflected in the outline. If the Intent and purpose of a Public Participation Plan were clearly spelled out within the Workplan, perhaps the tone and type of comments received on the Workplan would be different.
- The Public Participation Plan should describe how the public and community will be kept informed of activities conducted at the site and how their concerns will be responded to.
- The Public Participation Plan needs to itemize all the documents that are expected to be submitted on the project, the associated public comment period for each document, and a guarantee that those comments will be considered.
- It might be useful to review other Public Participation Plans that have been prepared by DTSC on projects in the Emeryville area.
- Do the questions in the outline reflect the issues that have been raised by the community in the various meetings and interactions that have occurred? Do the questions conform with the requirements of the DTSC Guidance documents? How will the answers to the questions be evaluated? The questions listed lack site specific inquiries such as health concerns, drinking water concerns, access to by children to the areas being investigated, eating vegetables from vegetable gardens, fugitive dust traffic, and so forth.
- Who will be present during the interviews? Will RWQCB staff be present during the interviews? How will the RWQCB ensure the compilation of the information gathered from the interviews is an accurate representation of the public's concerns and that mechanisms are in place within the Public Participation Plan to address those issues? The Responsible Parties, their attorneys and their technical consultants should not be participants in the interviews.
- Will the interviews be taped? If so, will the tapes be considered public record? Will the Responsible Parties have access to the tapes? If interviews are tapes, the confidentiality, or lack thereof, should be made

clear to the interviewee. The interviewee should be given a copy of the tape if they so request.


- Has the RWQCB considered the possibility of entering into a voluntary agreement with the DTSC Public Participation unit to address the Public Participation Plan?

SPECIFIC COMMENTS:

- I. C.1. Community Profile - This profile should include the proximity of the "Site" to homes, and/or schools, day care facilities, churches, etc.; and the current and proposed use of the properties defined within the "Site".
- I. Appendix E - Public Involvement Activities and Timing: This section discusses the possible creation of a "citizens task force." This needs to be more clearly defined. If a citizen's task force is considered, assurances must be given that those community members that are most impacted by the site are adequately represented on the task force.
- I. Appendix D - Glossary: Is this a general glossary for the project or for other needs? Who is preparing the definitions of terms for the glossary. Assurances must be made that definitions used in the glossary are a component available for public comment and that the definitions are consistent with definitions utilized by DTSC in the Public Participation Plan Guidance document.
- II. Appendix A - Residents Living near the Site: The individuals interviewed and their answers will be the basis for your Public Participation Plan. As you are aware, there are a number of other community members who have had concerns about the activities at the Sherwin Williams site. Does this list include those individuals that have been outspoken regarding their concerns regarding the activities at the site? Does this list adequately represent all the "residents living in the area"? The Workplan should describe how it is that you decided on the individuals listed to be interviewed and what you hope to get out of the interview.
- II. Community/Environmental Groups: TAG should not be included in this section. TAG is a consulting firm and is representing the Artists' Cooperative on a pro bono basis. Outreach efforts should be made to include environmental group representation.
- II. County and State Health Agencies: Barbara Cook, DTSC should be included. In addition, since Jane Riggan is an active participant on the Consultative Workgroup, it would seem appropriate to interview both Jane and Marilyn Underwood of the Department of Health Services.

Thank you for the opportunity to comment on this document. Please contact me if you have any questions or concerns regarding these comments.

Cordially,

A handwritten signature in cursive script that reads "Jody Sparks". The signature is written in black ink and extends across the width of the page.

Jody Sparks
President

Attachments

- cc: 45th Street Artists' Cooperative Members
Consultative Workgroup Members
Bonnie Holmes, Sierra Club
Gary Patton, Planning and Conservation League
Jane Williams, California Communities Against Toxics
Denny Larson, Communities for a Better Environment

PUBLIC PARTICIPATION TASKS & TECHNIQUES
THE PUBLIC PARTICIPATION PLAN - PP Plan Outline

SECTION 700

EXHIBIT 700-B

PUBLIC PARTICIPATION PLAN OUTLINE

A. Introduction:

- o Purpose of the PP Plan;
- o Agencies with oversight responsibilities at the site/facility;
- o Description of how information was obtained -- note that a list of persons interviewed during the Plan preparation is included in Appendix A;
- o Summary descriptions of community concerns and the public participation program; and,
- o How the Plan is organized.

B. Community Background:

- o Site/facility description;
- o Area and site maps;
- o History of site/facility (basic historical, geographical, and technical detail necessary to understand the site was listed on the State remediation list), including site location and proximity to community and geographic landmarks (e.g., homes, schools, playgrounds, businesses, lakes, streams);
- o Agency involvement;
- o History of community involvement, how the community has reacted to the site/facility in the past; and,
- o Community concerns and issues.
- o Demographics of community in which the site is located (e.g., socioeconomic level, ethnic composition, specific language considerations, etc.). This information may be found in local libraries.

C. Objectives of the PP Plan:

- o Objectives specific to public participation for this site/facility and any special circumstances the Plan will address;

(continued)

700-20-8

July 1994

A-1

PUBLIC PARTICIPATION TASKS & TECHNIQUES SECTION 700
THE PUBLIC PARTICIPATION PLAN - PP Plan Outline

EXHIBIT 700-8 (con't.)

- D. Public Participation Techniques:**
- o Characterize the strategy for the public participation program at the site. Topics to be covered include:**
 - a. Description of methods of communication or activities to be conducted;**
 - b. Timing of these activities in relation to technical milestones, including a planning matrix at the end of this section;**
 - c. Responsibility for implementation of these activities (DTSC, Contractor, RFP, etc.);**
 - d. Resources to be used in the public participation program (e.g., local organizations, meeting places); and,**
 - e. Areas of special sensitivity that must be considered when conducting public participation and remedial activities.**
- E. Public Participation Activities:** At a minimum, this section will include those required public participation activities stipulated under the Site Mitigation Program (Section 300) and the Hazardous Waste Management Program (Section 400).
- F. Schedule of Public Participation Activities:** This will be a one-page schedule that relates timing of public participation activities to technical milestones for the site/facility. If more than one entity has responsibility for the implementation of the PP Plan, list each public participation activity and who has the responsibility for its implementation (i.e., DTSC, RP, EPA, Regional Water Quality Control Board, county health department).

(continued)

700-20-9

July 1994

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PUBLIC PARTICIPATION TASKS & TECHNIQUES SECTION 700
THE PUBLIC PARTICIPATION PLAN - PP Plan Outline

EXHIBIT 700-8 (con't.)

- G. Appendix A - Key-Contacts Mailing List - This list will include names, titles, addresses and telephone numbers of all officials and group representatives contacted during the community interviews (indicated by asterisks) and others who should receive regular information about site development. Because the public participation plan is a public document, the telephone numbers and addresses of non-officials and non-affiliated individuals contacted for interviews will not be included as part of the Plan that is made available to the public. The list of contacts identified in the appendix should include the following:
- o DTSC's Mandatory Mailing List.
 - o Federal, State and local elected officials (including city, county or township).
 - o Local and regional environmental and citizens' groups.
 - o DTSC officials (include all programs involved in the remedial process, e.g., Technical Services, Public Participation, Site Mitigation Branch).
 - o Local, State and federal health and environmental agencies.
 - o City and county clerks; city, county, and regional fire, health, water, air, environmental health, planning and transportation officials.
 - o Media contacts (newspaper, radio, and television). (See Exhibit 700-16 on page 700-35-4 for complete list).
- H. Appendix B - Meeting Location and Information Repositories. This appendix will identify suitable locations for holding public meetings and making public information easily accessible to community members. Repository hours and contact names for both repositories and meeting places should also be included.

PUBLIC PARTICIPATION TASKS & TECHNIQUES **SECTION 700**
THE PUBLIC PARTICIPATION PLAN - PP Plan Outline

EXHIBIT 700-8 (con't.)

- I. Appendix C - Glossary of Terms. A glossary will be used if the site background is particularly complex or if many technical terms or jargon are used in the PP Plan. Terms defined in the glossary will be indicated in the text of the PP Plan by italics, bold-faced type or underlining.

700-20-11

July 1994

A-4

PUBLIC PARTICIPATION TASKS & TECHNIQUES SECTION 700
COMMUNITY INTERVIEWS - Overview & Timing

COMMUNITY INTERVIEWS

Community interviews are individual, in-person interviews, conducted by the PPS and the Program Manager/Permit Writer with community members, local officials, and other interested parties to:

- o Identify the interested community;
- o Obtain historical information about the site/facility;
- o Assess community issues and concerns;
- o Evaluate level of awareness about a project;
- o Obtain an understanding of past community involvement in this or other similar projects;
- o Receive input on how to best involve the community in the site mitigation or permit process; and,
- o Begin to establish a relationship with local agency and community representatives.

PUBLIC PARTICIPATION TASK RESPONSIBILITIES

ACTIVITY	PPS	***	PROJECT MANAGER/PERMIT WRITER
COMMUNITY INTERVIEWS	-Identify need for interviews. -Identify interview scope. -Identify language spoken in comm. -Prepare/approve questions. -Conducts interviews. -Review assessment summary/ (write for state-lead sites or permit.)	-Schedule interviews.	-Suggest interview participants. -Review and make recommendations on questions. -Participate in interviews. -Comment on summary.

***Activities which are not assigned to specific staff, but which must be accomplished by the PPS, Project Manager/Permit Writer, and/or clerical support.

Timing

Site Mitigation - Community interviews are the first step in the development of a PP Plan. An approved PP Plan must be in place before RI field work can begin at a site. (Refer to Exhibit 300-1, "Site Mitigation Technical Milestones and Public Participation Activities", page 300-10-2.) Interviews can also be done at any time during the site mitigation process, as needed, in order to

PUBLIC PARTICIPATION TASKS & TECHNIQUES**SECTION 700****COMMUNITY INTERVIEWS - Timing / Preparing for Interviews**

evaluate changing community make-up, interests, needs or concerns.

EWM Permitting - Community interviews should be done for any "high" community interest facilities, when review of the Part B permit application begins or when corrective action is initiated. Refer to Exhibit 700-1, "High Community Interest Criteria", page 700-10-3, for guidance on determining whether a facility is considered "high" interest. This determination may change for a facility at any time. The PPS is responsible for determining whether community interviews are necessary for a facility.

Preparing for Interviews

Community interviews are a time-intensive activity because of the large amount of organization required and time needed for interviews. While the level of effort will vary, schedule approximately four hours per interview for research and preparation, the interview itself, and follow-up activities.

Collect Background Information

Collect background information about the project and community. This information can be collected from other DTSC staff, newspaper reports, DTSC files, a drive-by site/facility inspection, other agencies, and the permit application/closure plan.

Organizations and Local Agencies

Identify contact persons at interested organizations and local agencies. In addition to establishing the community's level of interest, project staff must identify the organizations, agencies and individuals who have been interested or involved in the site- or facility-related activities to date. This information can be obtained by reviewing the following materials:

- o Newspaper clippings;
- o DTSC's public participation file for the site/facility; and,

PUBLIC PARTICIPATION TASKS & TECHNIQUES SECTION 700
COMMUNITY INTERVIEWS - Preparing for Interviews

- o DTSC telephone logs that record site- or facility-related public inquiries.

Establish an Interview Team

The PPS conducts the interviews with participation from the Project Manager/Permit Writer and responsible party or site mitigation project proponent, if applicable or deemed appropriate by the PPS.

Identify Persons to Interview

Develop a list of interested parties to interview. The project team must develop a list of community members to be interviewed, including representatives of those persons and organizations identified in the two steps above. Additional efforts should be made to identify those community members who are less vocal or visible, as they will provide additional perspectives and concerns about the site/facility that may not surface during interviews with more actively involved community members. DTSC policy requires the PPS to conduct and/or participate in the interviews. Project staff should accompany the PPS.

Refer to Exhibit 700-5 "List of Individuals and Organizations to Interview", on page 700-13-7.

Prepare List of Interview Questions

Develop a list of interview questions. The interview is an opportunity for community members to express their concerns about the site/facility directly to DTSC, and to have input to the public participation planning process. The questions posed during the interview should, therefore, be open-ended in order to elicit the widest range of community members' concerns and experiences regarding the site/facility. Questions should be phrased so as not to be leading or biased.

Exhibit 700-6, on page 700-13-8, contains a list of standard interview questions that may be used to guide the interview. This list is not inclusive

PUBLIC PARTICIPATION TASKS & TECHNIQUES
COMMUNITY INTERVIEWS - Preparing for Interviews

SECTION 700

and project staff should develop additional questions that will elicit site/facility-specific or community-specific concerns. For example, if the community has been suspicious or distrustful of local or state government actions or decisions in the past, questions should be asked that will supply DTSC with information on those events and the community's current attitudes toward local authorities. Site/facility files will provide information with which additional interview questions can be developed.

Arrange the Interviews

- o Telephone the people you have selected to interview, explain the purpose of the interview, and arrange a convenient time and place to meet. Ideally, the meeting place should promote candid discussions. While government and business representatives are likely to prefer meeting in their offices during business hours, local residents and community groups may be available only during non-business hours. Meetings at their homes may be most convenient.
- o The interviews may take place within a single community or over a large geographical area. It is important to plan ahead when scheduling the interviews and group them by geographic location to prevent back-tracking throughout the day. Depending on the number of interviewees and their geographic locations, one or more days may be required to complete the interviews.
- o Staff should allow for up to one hour per interview, plus time to travel to the next appointment. Appointments should be scheduled two to three weeks prior to the interview to allow time to send a letter confirming the date and time, reason for the interview, and topics to be discussed.
- o Interpreter should be used when interviewing community members who speak a language other than English.

700-13-4

July 1994

A-B

PUBLIC PARTICIPATION TASKS & TECHNIQUES SECTION 700
COMMUNITY INTERVIEWS - Conducting the Interviews

Conducting the Interviews

In conducting interviews, consider the following:

Explain Purpose

The PPS will begin the interview with a brief overview of the project, and explain that the primary goal of the interview is to obtain rather than disseminate information. The information gathered during the interview is used to assess community concerns, and to develop an appropriate public participation strategy. While DTSC staff may answer questions or provide a brief summary about DTSC activities and findings, the interview is not intended to serve as a formal briefing.

Assure Confidentiality

Explain that while the public involvement plan will be part of the project file, the plan will not attribute specific statements or information to any individual. Ask interviewees if they would like their names, addresses, and telephone numbers on the mailing list.

Identify Other Interested Parties

Ask the interviewees for names and telephone numbers of other persons who are interested in activities at the site/facility.

Determine Previous Outreach

Determine the interviewee's perception of past DTSC or site or facility public participation activities.

Identify Concerns About Site/Facility

When identifying citizens' concerns about the site or facility concerns, consider the following factors:

- o Threat to health or the environment
- o Economic concerns
- o Agency credibility

PUBLIC PARTICIPATION TASKS & TECHNIQUES SECTION 700
COMMUNITY INTERVIEWS - Community Interviews Summary

- o Community involvement
- o Media coverage (local, state, national)
- o Number of households/business affected

Future Public Involvement in Project

Explain the public involvement process, and ask the interviewees:

- o How they would like to be involved and informed of the project progress (keep a list of individuals who wish to be kept informed);
- o What is the best way to stay in contact;
- o To recommend convenient locations for holding public meetings and setting up information repositories.

Community Interviews Summary

Summary of community concerns should be written up at the completion of community interviews. The summary should not merely list the questions and answers, but should highlight the key issues and concerns. This can be incorporated into the PP Plan or, when no PP Plan is required, can become the basis for a memo to file, outlining a public participation strategy for the project. (Refer to the "tone and voice" to use, page 700-20-4.)

PUBLIC PARTICIPATION TASKS & TECHNIQUES SECTION 700
COMMUNITY INTERVIEWS - Individuals & Organizations to Interview

EXHIBIT 700-5

LIST OF INDIVIDUALS & ORGANIZATIONS TO INTERVIEW
(MUST CONTACT FOR INTERVIEW)**

- ** Residents located close to the site/facility
- ** Businesses located close to the site/facility
- Local chapter of the League of Women Voters
- Parent-Teachers Associations and school officials
- Chamber of Commerce
- Civic groups such as the Lions, Kiwanis and Rotary Clubs
- ** Appropriate City Council Member(s)
- ** City Planning Department
- ** County Supervisor(s)
- Environmental groups such as Sierra Club, Greenpeace and Citizens for a Better Environment
- University or community college leaders
- ** Representatives of State and local agencies such as the Regional Water Quality Control Board (RWQCB) and the Air District
- ** Representatives of the local Public or Environmental Health Department
- ** State legislators
- ** Federal legislators (federal legislators are only required at federal sites or RCRA facilities or NPL sites and should be considered at "high" profile state sites/facilities)
- ** Local/Regional community or environmental groups
- Sensitive receptors (e.g., Hospitals, Schools, Parks, Day Care Centers)