

Detterman, Mark, Env. Health

From: Larry R. Mencin [lrmencin@sherwin.com]
Sent: Monday, January 16, 2012 1:02 PM
To: Detterman, Mark, Env. Health
Cc: Sharma, Pawan; Jeff Rankin; David Cline; Smith, Randall T.
Subject: Former UST, Sherwin Williams, 1450 Sherwin Ave Emeryville CA

Mark - I am the Environmental PM for Sherwin-Williams Site at 1450 Sherwin Ave in Emeryville CA. I had requested that the removal of the former UST be conducted in order to avoid any issues for a potential site purchaser. We believed the tank was closed historically and does not need a permit to remove it. The tank is inert and breached. Please come out to our site and see the former UST area and massive remedial action being implemented.

TANK HISTORY

The former Underground Storage tank in question existed since the initial construction of our plant site in 1919. The former tank encroaches under an existing transformer slab that brings down a 65KVA electrical source from an underground line. The earliest site drawing reference that I recall calls out a 'benzen' tank and later reference calls out 'Napha' Tank. The Site in the 1990's referenced the tank as a former fuel tank. (Unknown as to Boiler fuel or other.) We have had no other anecdotal knowledge of the use of the UST. The tank ceased operation as far as we could tell ~1950. Shallow soils have been removed from around the tank area during several construction projects including the slurry wall installation that partially excavated the tank - ripping it open and placing a slurry composed of cement, bentonite and soil into the tank cavity. The slurry wall is one of the Interim Remedial Measures (IRMs) installed at the site.

AGENCY INTERACTION

Since the October 1995 meeting and submittal of the IRM Completion Report, we have understood the former tank to be closed. Its removal is presented as a non-remedial activity in the current DTSC-approved remedial action. The County has been a member of development of the remedial action, through the project's Consultative Working Group (CWG). The issue of needing a permit for removing this former tank only came up recently after discussion with DTSC. We then found through communication with the County that closure documentation for the former UST does not exist with the County. We continue to consider this former UST to be a closed case and its planned removal does not require a permit.

I was at the October 1995 meeting at the site with the CaRWQCB and County referenced in the County files. At the time of this meeting with CaRWQCB- Sum Arigala and Alameda County - Susan Hugo, it was determined that the site would be cleaned up under the pending CaRWQCB order under the full site remediation.

Sherwin-Williams has been working this site in cooperation with the CaRWQCB and now the CaDTSC under AB2061 - a "Lead Agency Agreement" (pronounced I-EE-d) Where historically CaRWQCB and now CaDTSC are the lead Agencies. It is our understanding that under this state statute the CaRWQCB or CaDTSC as Lead Agency can take the role of any other applicable state or local agency within the state. The County was copied on reports since July 1997 when this agreement was first put into place. The County did not comment on the IRM report nor the remedial design and implementation plan that included removal of this former UST.

The CaRWQCB Order was rescinded and replaced with an Order from CaDTSC in 2006. The full remediation conducted this summer has removed the existing IRMs; breaching the existing slurry wall and restoring groundwater flow through the site. The remedy has removed over 140,000 tons of soil and treated over 5 million gallons of water north of the area of the UST. We excavated to a depth of approximately 20 feet beneath the ground water table. Wells down gradient from the UST had been monitored since 1994. The IRM treated water within the slurry wall from 1995- through this year. Those wells have been removed with the remediation soils. The remedy accepted by DTSC for site chemicals, including metals, petroleum, SVOC, and VOCs, in ground water is Monitored Natural Attenuation (MNA) after the removal of the mass from the site.

Please take the time to come by our site in Emeryville while we have CDM as oversight of ENVIROCON as General Contractor. We will gladly tour you through this area to explain constraints on removing the former UST and additional soils around the tank area. If we can provide any additional information please let us know.

Sincerely,

The Sherwin-Williams Co

Larry Mencin
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Corp Remediation Services
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