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Comments: ATTACHED IS THE MONTHLY STATUS REPORT FOR THE SHERWIN-WILLIAMS SITE IN EMERYVILLE, CALIFORNIA.

The following have received this report via email:

Mark Johnson, Regional Water Quality Control Board (RWQCB)
Larry Mencin, The Sherwin-Williams Company
Vera Nelson, EKI
Mara Feeney, Mara Feeney & Associates
Jody Sparks, TAG
Peggy Peischl, Treadwell and Rollo

Please address questions or comments to any of the undersigned:

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MONTHLY SUMMARY REPORT
SHERWIN-WILLIAMS, EMERYVILLE, CALIFORNIA
April 1999

I. ACTIONS TAKEN MARCH 1999

A. IRMS

Extraction and Treatment System Expansion

- MSE continued with start-up and troubleshooting of the new system. The existing treatment system (Andco) continued to be operated to post-treat effluent from the MSE system until around mid-March at which point 10 days of continuous operation with discharge below the NPDES limit was achieved. The Andco system was then taken off-line and was periodically used to post-treat water during the continuing MSE system start-up phase of operation. The new carbon system was brought on-line in conjunction with the MSE system (to treat organics) with final discharge being sent directly to Temescal Creek.
- The RWQCB continued with review of the NPDES permit renewal application for the treatment system submitted in December 1998. The renewal of the NPDES permit will be effective in July 1999.
- LFR continued setting up the groundwater model for evaluating expansion of the extraction system on the Rifkin property. The model parameters were discussed with EKI and draft model boundary conditions were submitted to EKI and Chiron for review and approval. After agreeing on the model parameters with EKI and Chiron, LFR proceeded with running the model and evaluating several groundwater pumping scenarios on Rifkin. The model output will provide information for selecting a preferred pumping alternative. LFR also began preparation of plans and specifications for the Rifkin extraction system.

Stormwater Handling

- Continued monitoring of the storm-drain system on-site. The surface stormwater was discharged to Temescal Creek from the multi-point system during rain events. Monthly sampling of the multi-point system discharge was conducted during a rain event.
- Around mid-March a very small volume of groundwater was observed to be leaking into the storm drain vault adjacent to Temescal Creek. As requested by the RWQCB, a sample was collected and the arsenic concentration was 25 ppb, similar to concentrations in groundwater in this area. An inflatable plug was installed in the storm drain line outfall adjacent to Temescal Creek, which was successful in eliminating further leakage to the creek. A

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letter was submitted to the RWQCB on March 29 documenting these activities.

Completion Reports

- LFR completed reproduction of the Horton Street completion report and distributed the report on March 5, 1999 to the RWQCB, other agencies and the CWG. This report includes a discussion of the air monitoring results from the activities performed during the removal activities.

B. Site Investigation

- Entrix continued to address additional comments on the remedial investigation Workplan Addendum based on feedback from the CWG. The RWQCB submitted comments on the Workplan Addendum in a March 22 letter that was presented at the CWG meeting held on March 24. This meeting was held to review project status and discuss final input on the Workplan Addendum.
- LFR continued with abandonment of the former deep well on-site in accordance with the March 8, 1998 letter submitted by LFR to the RWQCB. A well driller was able to remove the former water supply pump and piping from the well. The condition of the well was assessed by a camera survey. Recommendations for closure of the deep well were discussed with the RWQCB based on the results of these activities. It was agreed that water samples should be collected at multiple depths if feasible and that the well should then be abandoned. A letter was submitted to the RWQCB on March 30 outlining the procedures for sampling and abandoning the well.

C. NPDES and Groundwater Monitoring

- LFR evaluated the data from the first quarter groundwater sampling and water level measurements collected in January and began preparation of the quarterly groundwater monitoring report.
- Continued operation of the Andco treatment system and monitoring NPDES parameters with discharge to Temescal Creek until the system was taken off-line during the second half of March. The MSE and carbon system was then operated with direct discharge to Temescal Creek with continued NPDES monitoring in accordance with RWQCB requirements.

D. Community Relations

- Telephone message updates and coordination with the local residents and businesses were conducted as needed to keep the local community informed of current activities.

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II. ACTIONS EXPECTED APRIL 1999

A. IRMS

Extraction and Treatment System Expansion

- MSE will continue with start-up and troubleshooting of the new system. The new carbon system will also be on-line to remove organics from the MSE system effluent. Training of the system operators was also initiated. The Andco system will continue to be on standby and will be used periodically if necessary to post-treat water from the MSE system during start-up.
- The RWQCB continued with review of the NPDES permit renewal application for the treatment system submitted in December 1998. The renewal of the NPDES permit will be effective in July 1999.
- LFR finalized the groundwater model (with input from Chiron and EKI) for evaluation of the expansion of the extraction system on the Rifkin property. The model output has provided information for selecting a preferred pumping alternative. Design of the extraction system continued and a draft set of plans and specifications were submitted to the RWQCB, Chiron and EKI for review and comment. Sherwin-Williams, the RWQCB, LFR, EKI and Chiron met on April 14 to finalize discussion of the model and agree on extraction well locations. Based on these discussions, LFR will prepare a draft workplan for RWQCB review (with prior input from Chiron and EKI) presenting the proposed installation of the Rifkin extraction system. In addition, the plans and specifications will be finalized

Stormwater Handling

- Continued monitoring of the storm-drain system on-site. The surface stormwater was discharged to Temescal Creek from the multi-point system during rain events. Monthly sampling of the multi-point system discharge was conducted during a rain event.

B. Site Investigation

- A response to the RWQCB and CWG comments to the Workplan Addendum will be submitted to the RWQCB and CWG by the last week of April or beginning of May.
- A detailed Remedial Investigation schedule will be developed and submitted to the RWQCB in May. The schedule will address the timeframe for off-site access and implementing the RI Investigation fieldwork during the summer of 1999.

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- LFR will continue with abandonment of the former deep well on-site in accordance with the March 8 and March 30 letters previously submitted to the RWQCB. Based on the assessment of the condition of the well, the well will be sampled at multiple depths and abandonment of the deep well will be implemented.

C. NPDES and Groundwater Monitoring

- LFR will continue with preparation of the quarterly groundwater monitoring report and the first quarter 1999 report will be submitted to the RWQCB. The quarterly sampling of the monitoring wells and measurement of water levels in the wells will be conducted.
- Start-up activities for the MSE system will continue with direct discharge of treated groundwater to Temescal Creek. The Andco system will continue to remain on standby to be utilized if necessary. NPDES monitoring will continue in accordance with RWQCB requirements and the first quarter 1999 NPDES monitoring report will be submitted to the RWQCB.

D. Community Relations

- Telephone message updates and coordination with the local residents and businesses will be conducted as needed to keep the local community informed of current activities.

III. PLANNED ACTIVITIES MAY 1999**A. IRMS*****Extraction and Treatment System Expansion***

- It is anticipated that MSE will complete start-up and troubleshooting of the new system. Training of the system operators will also be completed. The new carbon system will continue operating on-line to remove organics from the MSE system effluent. The Andco system equipment will remain at the site but it is anticipated that the system will not be utilized after May. The Andco system would only be brought back on-line if it was necessary to take the MSE system off-line for an extended period of time.
- It is anticipated that the RWQCB will submit a draft of the NPDES permit for public review. The renewal of the NPDES permit is scheduled to be effective in July 1999.
- LFR will finalize the workplan with submittal to the RWQCB and CWG for the Rifkin extraction system based on comments from the RWQCB, Chiron and EKI. Procurement of the well driller and construction contractor will

be implemented. The extraction wells will be drilled and the construction of the extraction system will begin by the end of the month.

Stormwater Handling

- Monitoring of the storm-drain system on-site will continue. The surface stormwater (if any) will be discharged to Temescal Creek from the multi-point system during rain events. Monthly sampling of the multi-point system discharge will be conducted if any rain occurs.

B. Site Investigation

- A detailed Remedial Investigation schedule will be developed and submitted to the RWQCB. The schedule will address the timeframe for off-site access and implementing the RI Investigation fieldwork during the summer of 1999. Access negotiations and procurement of the drillers and other subcontractors will be initiated in May.
- LFR will prepare a letter to be submitted to the RWQCB documenting the procedures and results of the closure of the deep well.

C. NPDES and Groundwater Monitoring

- The data from the quarterly sampling of the monitoring wells and measurement of water levels in April will be evaluated.
- Start-up activities for the MSE system will be completed. The MSE and carbon system effluent will discharge treated groundwater to Temescal Creek. Treatment system monitoring will continue in accordance with NPDES requirements.

D. Community Relations

- Telephone message updates and coordination with the local residents and businesses will be conducted as needed to keep the local community informed of current

IV. ACTION ITEMS BY OTHERS

- A revised schedule for the RI/RA/FS was presented in the January 8, 1999 Workplan Addendum. The RWQCB has accepted this schedule and the RWQCB should formally revise SCR Order 98-009 to reflect the modified schedule.
- The RWQCB will continue to review the NPDES permit renewal application. It is anticipated that a draft of the NPDES permit will be issued

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from the RWQCB by May 1999 in order to allow adoption of the permit by July 1999.

- EKI, Chiron and the RWQCB will provide comments on the proposed Rifkin extraction system workplan and design to allow Sherwin-Williams to proceed with drilling and construction in May.

V. COMPLIANCE WITH ORDER

The following deliverables for tasks, currently ongoing, are anticipated to be submitted by the dates noted. The tasks and schedule are in accordance with the SCR Order, and revised dates agreed by the RWQCB.

<u>Task</u>	<u>Anticipated Delivery Date</u>
Public Participation Plan (Final)	April 17, 1998*
Current Site Conditions, Site Use History, and Human-Made Conduits (Final)	June 19, 1998*
Health and Safety Plan (Final)	July 8, 1998*
QAPP (Final)	July 16, 1998*
Evaluation of Existing IRMs (Final)	August 10, 1998*
Workplan Addendum for Site Investigations (Draft)	January 8, 1999
RI Investigation Schedule	To be Determined

FINAL REPORT SUBMITTED

- No obstacles have been identified which threaten compliance with the Order.