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Date	December 15, 1999
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Project No.	6215.99-010

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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
Sandra Maxfield, Entrix

Please address questions or comments to any of the undersigned:

Larry Mencin, The Sherwin-Williams Company
Mike Marsden, LFR Levine-Fricke (LFR)
Mara Feeney, Mara Feeney & Associates

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

ACTIONS TAKEN – NOVEMBER 1999

A. IRMS

Extraction and Treatment System Expansion

- LFR reviewed results of the pumping tests performed on the new extraction
 well and monitoring wells on the former Rifkin Property to evaluate the
 capture zone in the upper sands of the A zone aquifer. LFR began
 preparing a draft work plan for revising groundwater extraction system on
 the former Rifkin Property.
- Groundwater elevations measured in piezometers indicate that there is an inward hydraulic gradient across the slurry wall at all measure locations.
- The groundwater treatment system flow rate has stabilized between 2 and 3 gallons per minute (GPM). The groundwater elevations have remained below the invert depths of the storm water system since July 1999.
- The RWQCB continued to prepare a draft NPDES permit, which is anticipated to be issued for public review in January. The renewal of the NPDES permit is anticipated to be adopted in February 2000.

Storm Water Handling and Environmental Cap

• Monitoring of the on site multi-point storm drain system continued. Numerous rain events occurred during November and water was discharged to Temescal Creek from the multi-point system. Water samples were collected from the first rain event and submitted to a state-certified laboratory for arsenic analysis. Arsenic was detected at a concentration of 31 ppb in the effluent sample collected from the eastern discharge line on November 7, 1999. Arsenic concentrations reported in the November 7, 1999 samples collected from the western discharge line and the truck pallet area discharge line were 13 and 8.1 ppb, respectively. Following receipt of the November 7, 1999 sample results, LFR performed an additional purge of the eastern discharge line and replaced the first 350 feet of the eastern discharge hose.

During the next two subsequent rain events, water samples were collected from the multi-point system discharge. Arsenic concentrations in all samples collected from the eastern, western, and truck pallet area discharge lines were less than 10 ppb.

 LFR's subcontractor began upgrading the electrical wiring and conduit of the multi-point system. Upgrades included replacing the above ground PVC electrical conduit with galvanized steel conduit. LFR's subcontractor continued making repairs to damaged sections of the environmental cap and applying an asphalt sturry seal to maintain the cap integrity. Repairs to the asphalt cap began in late October and included filling surface cracks and indentations, replacing and resurfacing damaged sections of asphalt along the railroad tracks, and resealing with an oil emulsion scaler. A majority of the repair work was scheduled over the weekends to minimize impact on plant operations.

B. Site Investigation

- Further investigation work by Entrix is on hold pending access for drilling from the UPRR and South BGR. Entrix will continue to analyze the data received from the investigation work completed to date.
- QA/QC of the data from the site investigation will be completed in December and the data can be discussed in general terms at this time.

C. NPDES and Groundwater Monitoring

- Treatment system operations and monitoring continued in accordance with NPDES requirements.
- Statistical analysis of data collected from monitoring wells MW-5 and RP-5 on the former Rifkin Property and LF-11 outside of the slurry wall near Building 35 indicate an increasing arsenic concentration trend in these wells.
- Sampling of the monitoring wells west of the UPRR has been suspended pending resolution of health and safety access issues along the tracks.

D. Community Relations

- Information hotline telephone message updates and coordination with the local residents and businesses were updated bi-weekly to keep the local community informed of current activities.
- A CWG meeting was not held during the month of November.

II. ACTIONS EXPECTED – DECEMBER 1999

A. IRMS

Extraction and Treatment System Expansion

- LFR will submit a draft work plan to the Chiron Corporation and the RWQCB for revising groundwater extraction system on the former Rifkin Property.
- Upon approval of the technical approach outlined in the work plan, LFR
 will finalize the work plan and authorize the drilling subcontractor to
 proceed with drilling, well installation, and well development activities of

- the former Rifkin Property. The drilling and well installation activities are tentatively scheduled to begin the week of December 27, 1999.
- Following approval of the work plan, LFR will procure a subcontractor to perform modifications to the existing extraction well vaults, extraction system piping, and air supply lines.
- The RWQCB will continue to prepare a draft NPDES permit, which is anticipated to be issued for public review in January. The renewal of the NPDES permit is anticipated to be adopted in February 2000.

Storm Water Handling and Environmental Cap

- LFR's subcontractor has completed the majority of repairs to damaged portions of the environmental cap. Due to scheduling conflicts and recent cooler temperatures, the asphalt slurry seal has not been applied to several small sections of the environmental cap. The slurry seal is most effective when it is applied to a dry asphalt surface and when air temperatures are above 60° F. LFR will schedule the subcontractor to slurry seal the remaining portions of the environmental cap when the weather forecast predicts dry and warmer weather.
- LFR's subcontractor will complete upgrades to the electrical conduit for the multi-point system.
- Monitoring of the onsite multi-point storm drain system will continue. It is likely that surface storm water will be discharged to Temescal Creek from the multi-point system. If sufficient storm events occur, sampling of the storm water discharge from the multi-point system will be performed twice per the month of December. Three storm water samples (one from each discharge line) will be collected per sampling event and submitted to an analytical laboratory for analysis of arsenic.

B. Site Investigation

- Further investigation work by Entrix is on hold pending access for drilling from the UPRR and South BGR. Entrix will continue to analyze the data received from the investigation work completed to date.
- QA/QC of the data from the site investigation has been completed. The data is being tabulated, posted, and evaluated.

C. NPDES and Groundwater Monitoring

- LFR will continue reviewing preliminary data from the sampling of wells and measurement of water levels in October and will begin preparing the draft 1999 annual groundwater monitoring report.
- Treatment system operations and monitoring will continue in accordance with NPDES requirements. LFR will begin preparing the draft 1999 annual NPDES monitoring report.

D. Community Relations

- A CWG meeting is scheduled at the Sherwin-Williams Emeryville plant for December 16, 1999 at 9:30 A.M.
- Information hotline 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 - JANUARY 2000

A. IRMS

Extraction and Treatment System Expansion

- The RWQCB will continue to prepare a draft NPDES permit, which is anticipated to be issued for public review in January. The renewal of the NPDES permit is anticipated to be adopted in February 2000.
- Following drilling, installation, and development of the extraction and monitoring wells on the former Rifkin Property, LFR's subcontractor will begin modifications to the extraction well vaults, and the water and air conveyance lines for the groundwater extraction system. Following completion of modifications to the groundwater extraction system, LFR will perform an hydraulic test over a two-week period to evaluate the capture zone and any response in the upper and deeper sand units.

Storm Water Handling

 Monitoring of the on site multi-point system will continue. If sufficient storm events occur and the arsenic concentrations reported from the December sampling are less than the NPDES limit of 25 ppb, sampling of the storm water discharge from the multi-point system will be reduced to once in the month of January. Three storm water samples (one from each discharge line) will be collected and submitted to an analytical laboratory for analysis of arsenic.

B. Site Investigation

Assuming access for drilling from the UPRR and South BGR is granted,
 Entrix will continue with the investigation work. It is anticipated Entrix will continue analyzing the data from the investigation work completed to date.

C. NPDES and Groundwater Monitoring

 LFR will sample wells (including the new wells installed on the former Rifkin Property) and measure water levels in accordance with the quarterly

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monitoring program. LFR will complete and submit the 1999 annual groundwater monitoring report to the RWQCB.

 Treatment system operations and monitoring will continue in accordance with NPDES requirements. LFR will complete and submit the 1999 annual NPDES monitoring report to the RWQCB.

D. Community Relations

- A CWG meeting is anticipated to be scheduled at the Sherwin-Williams Emeryville plant in January 2000.
- Information hotline 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.

VI. 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 from the RWQCB in December 1999 in order to allow adoption of the permit by January 2000.
- The RWQCB may need to prompt the UPRR and South BGR concerning access issues for further offsite investigation to be completed.
- MSE is working with the DTSC Office of Pollution Prevention and Technology Development to evaluate and approve their reductive precipitation process as a State-certified arsenic treatment technology for groundwater.

V. COMPLIANCE WITH ORDER

Due to access issues on neighboring properties, several milestones in the current schedule will likely not be met. A revised schedule will be determined once the access issues have been resolved.

The following deliverables for tasks were submitted by the dates noted. The tasks and schedule are in accordance with the SCR Order, and revised dates agreed by the RWQCB. As noted above, the SCR schedule needs to be revised by the RWQCB for future tasks.

Task

Anticipated Delivery Date

LFR Levine-Fricke

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 (including Entrix response to comments)	January 8, 1999*

* FINAL REPORT SUBMITTED

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