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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
Melissa Mednick, Mara Feeney & Associates
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**MONTHLY SUMMARY REPORT
SHERWIN-WILLIAMS, EMERYVILLE, CALIFORNIA
August 2000**

I. ACTIONS TAKEN – JULY 2000**A. IRMS*****Extraction and Treatment System Expansion***

- The RWQCB submitted a letter authorizing Sherwin-Williams to discharge treated effluent from the groundwater extraction and treatment system under the recently adopted General Waste Discharge Requirements Order No. 99-051, NPDES No. CAG912003. The letter authorized Sherwin-Williams to discharge treated effluent with arsenic concentrations of no more than 25 µg/L. The authorization will be in effect until an NPDES individual permit is issued by the RWQCB.

Storm Water Handling and Environmental Cap

- Monitoring of the on-site multi-point storm drain system continued. No rain events occurred during July and water was not discharged to Temescal Creek from the multi-point system.

B. Site Investigation

- Further investigation work by Entrix is on hold pending access for drilling from the UPRR and South BGR (Wareham Property). Entrix will continue to analyze the data received from the investigation work completed to date.
- Due to the uncertainty of obtaining access from the UPRR to collect remedial investigation samples along the UPRR right of way, Sherwin-Williams began initial discussions with the RWQCB regarding alternative acceptable sample locations.
- 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

- Groundwater treatment system operations and monitoring continued in accordance with NPDES requirements.
- LFR submitted the 2nd quarter NPDES monitoring report and the 2nd quarter groundwater monitoring report per the Site Cleanup Requirements (SCR) Order 98-009. The quarterly NPDES and groundwater monitoring reports were submitted in compact disk (CD) format.
- LFR performed the 3rd quarter sampling for the Sherwin-Williams site and the former Rifkin Property. Based on conversations with the RWQCB, LFR

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implemented a reduced sampling plan for monitoring wells located outside of chemically-affected areas.

- Due to equipment failure, groundwater level measurements scheduled for the end of July 2000 in monitoring wells/piezometers were delayed until early August 2000.
- Sampling of the monitoring wells west of the UPRR resumed following resolution of access and health and safety issues along the tracks. The City of Emeryville granted the Sherwin-Williams Company a temporary right of entry permit to gain access through the Shellmound Property in order to sample the three monitoring wells west of the UPRR tracks. Once the City of Emeryville transfers title to the new property owner, a new access agreement will be needed to continue monitoring the wells west of the UPRR tracks.
- Statistical analysis of data reported in the 2nd quarter groundwater monitoring report from wells located outside the slurry wall indicate an increasing arsenic concentration trend in monitoring wells MW-5 on the former Rifkin Property and LF-11 near Building 35.
- LFR completed the treatment of the 10 on-site extraction wells and the three extraction wells on the former Rifkin Property for the presence of iron bacteria. The extraction wells were redeveloped and the associated pumps, discharge hoses, and well totalizers were treated using non-corrosive and non-toxic chemicals. The purge water generated during the treatment activities was transferred to two 5,000-gallon portable polyethylene tanks pending analytical results for onsite treatment or offsite disposal. The groundwater extraction and treatment system was brought back online on July 5, 2000.
- During a routine inspection, LFR identified a significant amount of iron bacteria has accumulated in the groundwater treatment system equalization tank. The buildup of iron bacteria in the equalization tank has resulted in frequent clogging of the main process pump and reduced the effective diameter of the process piping.

D. Community Relations

- Information hotline telephone message updates and coordination with the local residents and businesses were updated monthly to keep the local community informed of current activities.
- A CWG meeting was not scheduled for the month of July 2000.

II. ACTIONS EXPECTED – AUGUST 2000

A. IRMS

Extraction and Treatment System Expansion

- LFR will continue preparing a technical memorandum summarizing the data collected during the various pumping tests and extraction system expansion activities on the former Rifkin Property.

Storm Water Handling

- Monitoring of the on-site multi-point storm drain system will continue.

B. Site Investigation/Risk Assessment

- The RWQCB, Sherwin-Williams, and Entrix will meet on site to determine if the alternate locations to the UPRR right of way sample locations are acceptable.
- Assuming access for drilling from the alternate locations and South BGR (Wareham Property) is granted, Entrix will continue with the investigation work.
- Entrix will analyze the data from the investigation work completed to date and begin applying it to the risk assessment.

C. NPDES and Groundwater Monitoring

- The groundwater treatment system operations and monitoring will continue in accordance with NPDES requirements.
- LFR will measure groundwater levels in accordance with the quarterly monitoring program.
- LFR will continue monitoring the effectiveness of the treatment chemicals by collecting confirmation samples and visually inspecting well pumps and discharge lines for the presence of iron bacteria.
- LFR will treat and remove the iron bacteria present in the groundwater treatment system equalization tank.

D. Community Relations

- A CWG meeting is not scheduled for the month of August 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.

III. PLANNED ACTIVITIES – SEPTEMBER 2000**A. IRMS*****Extraction and Treatment System Expansion***

- LFR will schedule a subcontractor to modify the extraction well vaults and associated piping for the groundwater extraction system on the former Rifkin Property.

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Storm Water Handling

- Monitoring of the on-site multi-point system will continue. LFR will perform the annual cleaning of the multi-point system catch basin liners, pumps, and discharge hoses in anticipation of the 2000/2001 rainy season.

B. Site Investigation/Risk Assessment

- Assuming access for drilling from the UPRR and South BGR (Wareham Property) is granted, Entrix will continue with the investigation work.
- Entrix will analyze the data from the investigation work completed to date and begin applying it to the risk assessment.

C. NPDES and Groundwater Monitoring

- Treatment system operations and monitoring will continue in accordance with NPDES requirements.
- LFR will collect groundwater level measurements from wells/piezometers associated with the former Rifkin Property.
- Based on the effectiveness of the treatment of iron bacteria in the extraction wells, LFR anticipates proceeding with treatment of the monitoring wells and piezometers.

D. Community Relations

- A CWG meeting is scheduled at the Sherwin-Williams' Emeryville plant on September 20, 2000 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.

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 indicated in the June CWG meeting that the RWQCB would issue a letter to UPRR and Sherwin-Williams to complete the access agreement.

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.

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In discussions at the June CWG meeting, Sherwin-Williams, Entrix, and the Agencies concluded that due to the access issues, the draft RI report will be submitted in January 2001 and the draft risk assessment will be submitted in March 2001.

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.

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

*** FINAL REPORT SUBMITTED**

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