

Treadwell & Rollo

Via Facsimile: (216) 566-2730
22 January 1999
Project No. 2323.01

Mr. Larry Mencin
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

**Subject: Workplan Addendum
Sherwin-Williams Facility
Emeryville, California**

Dear Mr. Mencin:

Treadwell & Rollo, Inc. (T&R) has prepared the following comments on the above-referenced report dated January 1999. The following comments were prepared on behalf of Shell Oil Company:

1. Page 2-14, Section 2.1.2.1, and Appendix A: Shell Development Company occupied the South BGR property from approximately 1928 to 1969.
2. Page 2-15, Paragraph 2: It has not been established that all ground water and soil contamination at the South BGR property has been solely "affected by activities at the BGR property" (emphasis added). We request that Paragraph 2 be modified so that contamination only by activities at the property is not implied in this report. Suggested language for your consideration (changes in italics): "Groundwater and soil quality has been affected by activities at *or nearby* the BGR property . . ."
3. Page 2-15, Paragraph 2: Additional data for arsenic in shallow ground water were collected in July 1998. The subsequent report should be added to the reference at the end of this paragraph: (EKI 1994; T&R 1998). The objective of the focused ground water investigation was to evaluate whether arsenic detected on-site in the past by EKI is contributing to the arsenic plume migrating from the Sherwin-Williams site. The data indicated that:

"... the arsenic contamination detected in ground water at LF-28 is not due to a source on the Former Shell Research Facility [the South BGR property]. The elevated concentration of arsenic at LF-28 is likely due to the known source of arsenic contamination at the adjacent Sherwin-Williams site, due to historical leakage from the adjacent underground sewer line or other routes of preferential migration." (T&R 1998)

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These very relevant, recent data should be included in the data summary tables and shown on Figure 3-9. The report, distributed to the Regional Water Quality Control Board (RWQCB) and the Sherwin-Williams Consultative Work Group (CWG), should also be added to Section 7.0, References. (*Arsenic Investigation Report*, South BGR Property, Emeryville, California; Treadwell & Rollo, Inc.; October 9, 1998)

4. Pages 2-29 through 2-33: In general, we disagree with the limited inclusion of the lateral flow scenarios and premature conclusions presented in Section 2.2.6 and Table 2-3. Pipes and associated backfill should not be automatically eliminated as potential lateral conduits because they are located above the assumed ground water table. The flow scenarios did not address direct chemical inflow into pipes with subsequent leaking into backfill, surrounding soil and ground water, whether the pipes were located above or below the ground water table. The conclusion that only minor historical releases occurred from SS-5 appears not only premature but also based on the admittedly unlikely scenario presented in the Workplan Addendum (Page 2-33, lines 4-7). However, a scenario with direct chemical inflow to the drain system (not limited to ground water seeping into a pipe under high ground water conditions), to SS-5, with leaking during low water table conditions would likely result in more than "minor" contamination.
5. Pages 2-33 through 2-37: The summary of previous field investigations should include the July 1998 ground water sampling for arsenic, since data were collected at locations within Horton Street (T&R 1998). These data are relevant to the interpretation of other ground water data collected on the Sherwin-Williams site, Horton Street, and the South BGR property (see Comment 3 above).
6. Figure 2-6: This figure shows several cross section locations that are not subsequently represented on figures. We understand that draft cross sections are available by request, and we would appreciate a draft copy of Cross Section A-A'.

If you have any question, please call me at (925) 253-4980, Ext. 420.

Sincerely,
TREADWELL & ROLLO, INC.



Margaret K. (Peggy) Peischl, P.E.
Senior Engineer

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