



California Regional Water Quality Control Board

San Francisco Bay Region

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 • FAX (510) 622-2460

Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

March 22, 1999
File No. 01S0204 (MEJ)

Larry Mencin, Env. Specialist
Corporate Env. Health and Regulatory Services
The Sherwin-Williams Company
101 Prospect Ave., N.W.
Cleveland, OH 44115

Subject: January 8, 1999, Workplan Addendum, Sherwin-Williams Site, 1450 Sherwin Avenue, Emeryville, Alameda County

Dear Mr. Menein:

Regional Board staff (staff) have reviewed the subject Workplan Addendum (Addendum). The Addendum has been prepared pursuant to Site Cleanup Requirements (SCR) Order 98-009 and is an addendum to the Workplan for Site Investigation dated June 2, 1997 with amendments dated September 10, 1997, which were required pursuant to a previous Cleanup and Abatement Order. In addition, the subject Addendum supplements the June 19, 1998 Current Conditions Report which was also required by SCR Order 98-009.

Staff, upon completing our review of the Addendum have prepared comments contained herein. Staff have two primary concerns with the report: 1) investigation of arsenic impacted groundwater along Horton Street; and 2) lack of groundwater data in the northern area outside Building 35. In addition, comments have also been submitted to the Board by Shell and Chiron. These comments are attached. We have also received and reviewed your letter dated February 19, 1999, which responds to Chiron's comments.

Our comments are as follows:

- 1) In regard to the arsenic which has been detected in groundwater along Horton Street, we recognize that the source and mechanism of discharge has not been determined. We also recognize that the Sherwin-Williams site would be a likely source, but possibly not the only source. What ever the case may be, we will require, at a minimum, that this arsenic impacted groundwater be considered as part of the site for purposes of investigation.
- 2) Staff find that there is a lack of groundwater data in the area along the northern end of Building 35. Significantly high levels of arsenic have been detected in monitoring well LF-3 (up to 25 mg/l) located on the northeast corner of the building, just outside of the slurry wall. Additionally, just inside the slurry-wall in this area, monitoring

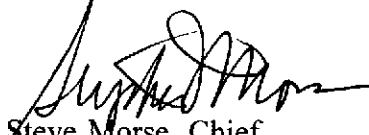
California Environmental Protection Agency

wells LF-17 and LF-2 have detected arsenic at concentrations up to 80 and 110 mg/l, respectively. Based on the groundwater concentrations in this area, staff find that additional investigation are needed to insure that the plume is defined and not continuing to migrate.

Please address our comments above as well as those submitted by Shell. It is our understanding that your letter of February 19, 1999 is Sherwin-Williams response to Chiron's comments. If this is not the case, please let us know.

Should you have any comments or questions, please contact Mark Johnson of my staff at (510) 622-2493.

Sincerely,



Steve Morse, Chief
Toxics Cleanup Division

encl.: January 22, 1999, Chiron letter
January 22, 1999, Shell letter

cc: attached list w/o enclosures

Jane Riggan/Marilyn Underwood
California DHS
Env. Investigations Branch
1515 Clay St.
Oakland, CA 94612

Paul Caleo, Esq.
Lawson and Burnham
P.O. Box 119
Oakland, CA 94604-0119

Vera Nelson
Erler and Kalinowski
1730 S. Amphlett Blvd., Suite 320
San Mateo, CA 94402

Peggy Peischl
Treadwell and Rollo
2 Theatre Square, Suite 216
Orinda, CA 94563

Mark Knox
Levine-Fricke-Recon
1900 Powell Street, 12th Floor
Emeryville, CA 94608-1827

**CONSULTATIVE WORKGROUP
MAILING LIST
SHERWIN-WILLAMS SITE
EMERYVILLE**

ENVIRONMENTAL
PROTECTION
25 MAR 26 AM 9:20

Barbara Cook/Alan Lui, Chief
Site Mitigation Unit
DTSC
700 Heinz Ave., Suite 200
Berkeley, CA 94707

Susan Hugo
Alameda County Health Agency
Div. of Env. Protection
Dept. of Env. Health
1131 Harbor Bay Parkway
Alameda, CA 94502

Randi Parker-Germaine/Paul Germaine
45th St. Artists' Cooperative
1420 45th St.
Emeryville, CA 94608

Jay Grover
Env. Health and Safety
Chiron Corporation
4560 Horton St.
Emeryville, CA 94608

Jody Sparks
California Environmental Research Group
P.O. Box 74980
Davis, CA 95617-4980

Ignacio Dayrit
Redevelopment Agency
City of Emeryville
2200 Powell Street
Emeryville, CA 94608-1806

Mara Feeney, Principal
Mara Feeney & Assoc.
19 Beaver Street
San Francisco, CA 94114