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### **SHERWIN WILLIAMS SITE ACTIVITY MODIFICATION UPDATES**

**On July 15, 2011**, Sherwin-Williams requested a modification to the frequency of the perimeter air sampling and analysis for arsenic, lead, and VOCs. This request does not affect ongoing real-time perimeter PM10 (dust) and total VOC monitoring. Per the DTSC-approved RDIP, it was anticipated that Sherwin-Williams would request to reduce the frequency of the continuous perimeter air sampling and the laboratory analysis.

After four weeks of sampling, the request included two modifications. The first was to suspend continuous perimeter air sampling and analysis for arsenic and lead based on the following:

- Laboratory analysis to date have shown that the dust control measures implemented with the start of excavation have been sufficient to maintain arsenic and lead in the perimeter air at levels below their respective performance standards.
- The soils excavated to date have had the highest concentrations of arsenic and lead detected in the planned excavation areas, as such, and because similar dust control measures will continue to be implemented for the remainder of the excavation, use of the real-time monitoring is anticipated to be sufficient for protecting the surrounding community.
- The use of real-time PM10 monitoring will be confirmed periodically with air sampling for arsenic and lead when excavating in areas with higher arsenic and/or lead concentrations.

The second modification was to temporarily suspend the continuous perimeter air sampling and analysis for VOCs during excavation of the vadose zone soil excavation based on the following:

- Laboratory analysis to date have shown that vapor control measures implemented with the start of excavation have been sufficient to maintain VOCs in the perimeter air at levels below their respective performance standards,

- It is anticipated that up to two weeks may be needed to complete the vadose zone soil excavation. As such, and because similar vapor control measures will continue to be implemented for the remainder of the vadose zone soil excavation, use of the real-time total VOC monitoring is anticipated to be sufficient for protecting the surrounding community.
- The use of real-time total VOC monitoring will be confirmed periodically with perimeter air sampling and analysis for VOCs when excavating vadose zone soils with higher VOCs. It is anticipated that this will involve up to 2 days of sampling.
- Real-time individual VOC analyzer (i.e., PhotoVac Voyager GC) and air sampling equipment will remain present on-site and air samples will be collected if total VOC monitoring indicates a potential risk to the community.
- When the excavation is anticipated to reach the elevation of saturated soils (10 feet elevation), daily perimeter air sampling and analysis for VOCs will resume.

DTSC believes the safety precautions presented are appropriate to protect the surrounding community. Therefore, DTSC has approved these modifications.

**On July 18, 2011**, DTSC learned from Sherwin-Williams that the waste facility that will be receiving hazardous waste by rail has requested that, in order to fulfill their Federal RCRA Permit obligations, two truckloads of waste for each set of rail cars must be sent for treatability testing before sending each type of waste by rail. These two truckloads will allow the waste facility to establish the volume treatment process of each waste that it will be receiving, will prevent loaded rail cars from having to wait while the facility establishes this treatment process, and will allow for the efficient transfer and return of rail cars so they can be reused more quickly.

DTSC anticipates that a maximum of six trucks will be necessary. Two trucks will leave the site at the same time. This may occur up to three times. The waste will be securely covered. The exterior of the trucks will be decontaminated prior to leaving the site, properly placarded, and will follow the transportation plan established for the project.

Though the shipment of this waste via trucks was not planned for, DTSC believes it is necessary to provide efficient shipment of the waste and in turn support the efficient cleanup of the site. DTSC believes the existing safety precautions presented in the RDIP and Community Safety Plan are appropriate to protect the surrounding community. Therefore, DTSC has approved this request.