California Regional Water Quality Control Board
Central Coast Region

Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

August 3, 2006

Mr. Curt Richards
Vice President, Environmental, Health & Safety
Olin Corporation
P.O. Box 248
Charleston, TN 37310-0248

Dear Mr. Richards:

SLIC: 425 TENNANT AVE, MORGAN HILL; STATE WATER BOARD MONITORING REQUIREMENTS

This letter is in response to your July 18, 2006 "State Board Required Monitoring Program Revisions" letter. Your letter requests Executive Officer concurrence with the revised monitoring frequency of certain wells as directed by the State Water Resources Control Board (State Water Board) in its Order No. WQ-2005-0007 (State Water Board Order), adopted on May 19, 2005.

The State Water Board Order provides specific monitoring requirements for wells subject to replacement water. Specifically, the State Water Board Order states, *"...Olin shall implement monitoring requirements for wells subject to replacement water. These requirements address conditions under which monitoring may be discontinued. The requirements are incorporated and included as Attachment A".*

If Olin has stopped supplying replacement water to users of a given well, Olin must now implement specific monitoring requirements for this well, as outlined in "Attachment A" of the State Water Board Order.

You have misinterpreted the monitoring requirements specified in "Attachment A" of the State Water Board Order. The monitoring requirements specified in "Attachment A" of the State Water Board Order <u>begin after replacement water service has been terminated</u>. The following outline provides our understanding of the groundwater-monitoring requirements upon termination of replacement water. Please review "Attachment A" of the State Water Board Order and review the Central Coast Water Board staff's paraphrased summary of the monitoring requirements below:

1. **Wells with a perchlorate concentration between 5.0 to 6.0 µg/L:** Olin will sample the well every other month (bimonthly) for eight months (four sampling events) after bottled water has been terminated. If, after eight months, there is no trend or an increasing or probably increasing trend in perchlorate concentrations, Olin will continue to sample the well every other month until there is a stable, decreasing, or

probably decreasing trend in perchlorate concentrations. If the trend is stable, decreasing, or probably decreasing, then Olin will sample at least twice per year for one year (summer and winter). If the trend is still stable, decreasing, or probably decreasing after sampling twice per year for one year, Olin will sample once in the next year, and if it is still stable, decreasing, or probably decreasing, then Olin may stop sampling the well with concurrence from the Water Board's Executive Officer.

2. **Wells with a perchlorate concentration between 4.0 and 5.0 µg/L:** Olin will continue to sample the well at least twice per year (summer and winter). If, after two years or four sampling events, there is no trend or an increasing or probably increasing trend in the perchlorate concentrations, Olin will continue to sample twice per year until the perchlorate concentrations are either stable, decreasing, or probably decreasing; Olin will then sample once in the next year. If that concentration is less than 5.0 µg/L and the trend is still stable, decreasing, or probably decreasing, Olin may stop sampling the well with concurrence from the Water Board's Executive Officer.

3. **Wells with perchlorate concentrations below 4.0 µg/L (and within 500 feet of wells that have had a detection of perchlorate greater than 6.0 µg/L):** Olin will continue to sample twice per year for one year (summer and winter). If the perchlorate concentrations continue to be below 4 µg/L, then Olin must sample once in the next year. If that concentration is also less than 4 µg/L, Olin may stop sampling the well with concurrence from the Water Board's Executive Officer.

4. **Wells with a perchlorate concentration below 4 µg/L (and <u>not</u> within 500 feet of wells that have had a detection of perchlorate greater than 6.0 µg/L):** Olin may stop monitoring. However, we request that Olin continue monitoring and continue supplying bottled water if this well is in close proximity to the Olin Site (Area I).

5. **Wells with a perchlorate concentration greater than 6.0 µg/L in any future sampling events:** Olin is required to commence replacement water service for a minimum of one year until well testing results show perchlorate concentrations equal to or less than 6.0 µg/L for four consecutive quarters. Olin may then terminate bottled water with Executive Officer concurrence and begin specific well monitoring requirements as outlined in "Attachment A" of the State Water Board Order.

You did not interpret Attachment A's schedule to begin prior to bottled water termination. If you had interpreted it that way, you would have sampled the "5 to 6 ppb" wells bimonthly last year, according to schedule, part No. 1, above. However, you did not follow that protocol.

Effective immediately upon termination of bottled water service for those wells subject to replacement water, Olin is required to implement the specific monitoring requirements, as outlined in "Attachment A" of the State Water Board Order and as clarified above. Please resubmit Tables 1 through 4 of the July 18, 2006 letter **<u>no later than August 18, 2006</u>**.

If you have any questions, please contact **Hector Hernandez at: (805) 542-4641** or via e-mail at: Hhernandez@waterboards.ca.gov, or Eric Gobler at (805) 549-3467.

Sincerely,

Roger W. Briggs
Executive Officer

cc via e-mail:

Ms. Lori Okun
Office of the Chief Counsel
State Water Resources Control Board

Olin Interested Parties IPL

cc via U.S. Mail:

Olin Correspondence IPL

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