California Regional Water Quality Control Board
Central Coast Region

Linda S. Adams
Secretary for Environmental Protection

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Arnold Schwarzenegge
Governor

January 5, 2007

Mr. Curt Richards
Olin Corporation
Environmental Remediation Group
P.O. Box 248
Charleston, TN 37310-0248

Dear Mr. Richards:

SLIC: 425 TENNANT AVENUE, MORGAN HILL. PHASE 7: TERMINATION OF REPLACEMENT WATER AND REQUEST FOR REVISED MONITORING FREQUENCIES

This letter responds to Olin's December 18, 2006 request for our concurrence to terminate replacement water (i.e., bottled water) for 23 wells per State Water Resources Control Board (State Water Board) Order WQ 2005-0007. Olin also requested our concurrence to revise monitoring frequencies for these 23 wells in accordance with our letter dated October 6, 2006 *(SLIC: 425 Tennant Ave, Morgan Hill; Termination of Replacement Water and Post Monitoring Requirements)*.

On December 18 and 19, 2006, Olin provided Central Coast Water Board staff with the seventh phase of analytical results (23 wells) that Olin determined to meet the State Water Board criteria for termination of bottled water service. We reviewed the analytical data and laboratory quality assurance/quality control (QA/QC) data associated with the phase seven wells. Based on a thorough evaluation of all the analytical data and QA/QC results, we concur that the State Water Board criteria has been met for all 23 wells in phase seven.

On December 18, 2006, Olin submitted revised monitoring frequencies for all phase seven wells, as required by our October 6, 2006 letter. Based on our review of the proposed monitoring frequencies and the available perchlorate concentration data provided up to and including November 22, 2006, we concur with all the proposed revised monitoring frequencies for all wells with the exception of well 10S04E17M013. During the second and third quarter of 2006, well 10S04E17M013 had perchlorate concentrations of 6.0 µg/L. Historically, this well has had concentrations of perchlorate ranging from 4.2 to 6.9 µg/L. However, during the fourth quarter of 2006, perchlorate was not detected above the method detection limit of 1.4 µg/L for the first time. We are concerned that the non-detect result may be an anomaly. Therefore, Olin is required to

collect two bimonthly samples from this well to confirm that perchlorate concentrations continue to be less than 4.0 µg/L.

For all future requests for changes in post-bottled water monitoring frequencies, please submit your request in writing and provide an electronic version of Olin's Microsoft EXCEL tables with all relevant well information. In addition, please provide the date that bottled water was terminated for each well, the result of the Mann-Kendall trend analysis, and whether the well is within 500 feet of a well that has perchlorate concentrations greater than 6.0 µg/L.

We appreciate your continued cooperation on this matter and if you have any questions, please contact **Thea Tryon at (805) 542-4776**, Hector Hernandez at (805) 542-4641 or Eric Gobler at (805) 549-3467.

Sincerely,

for Roger W. Briggs
Executive Officer

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cc via E-mail:

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

Olin Technical Contacts IPL

cc via mail:

Olin Correspondence IPL