California Regional Water Quality Control Board

Central Coast Region

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Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

May 8, 2007

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

Dear Mr. Richards:

SITE CLEANUP PROGRAM: 425 TENNANT AVENUE, MORGAN HILL; RESPONSE TO OLIN'S REQUEST FOR EXTENSION OF DUE DATE FOR LLAGAS SUBBASIN CLEANUP WORKPLAN

This letter is in response to Olin's request to extend the due date for the submittal of *Llagas Subbasin Cleanup Work Plan* (Cleanup Work Plan). The Cleanup Work Plan is required in accordance with Directive K. of Cleanup or Abatement Order No. R3-2005-0014. As directed by our Central Coast Water Board's (Water Board) letter dated March 29, 2007, concerning Olin's *Revised Cleanup Feasibility Study Report*, Olin must prepare and provide a Cleanup Work Plan acceptable to the Executive Officer that details implementation plans for the selected and approved remedial alternative(s).

Our March 29, 2007, letter requires Olin to submit a Cleanup Work Plan by May 15, 2007. The Cleanup Work Plan must include a detailed description of the proposed phased remediation strategy, an updated schedule, and a *Performance Monitoring Program*, and *Remediation Contingency Plan* for both hydraulic containment in Zone A and monitored attenuation in Zones B and C.

Olin is requesting a 30-day extension to the Cleanup Work Plan's due date because it contends the Water Board's requirements for the monitoring program and contingency plan are substantial and require significant consideration by its consultants MACTEC and Geosyntec, as well as by Olin. Olin indicates that approving the extension request will allow Olin and its consultants an opportunity to:

- Evaluate additional monitoring data and confirm the need for hydraulic containment within the shallow aquifer,
- Develop an accurate intermediate zone extraction-well location, and
- Address the Water Board's pending comments on the 2006 Characterization report regarding deep aquifer characterization.

Based on the justifications provided, we believe your request for a 30-day extension for the submittal of a *Llagas Subbasin Cleanup Work Plan* is reasonable and appropriate. Therefore, by **June 15, 2007**, Olin is required to submit a *Llagas Subbasin Cleanup Work Plan*. The Cleanup Work Plan must detail implementation plans for the selected and approved remedial alternative(s), as outlined in our letter dated March 29, 2007, concerning Olin's *Revised Cleanup Feasibility Study Report*.

We also concur with Olin's recommendation to address all issues related to the Llagas Subbasin characterization activities (particularly the deep aquifer zone's data gaps) separately from the Cleanup Work Plan. By **June 15, 2007**, Olin is hereby required to provide a *Deep Aquifer Characterization Work Plan* separate from the Cleanup Work Plan. Water Board staff will clarify our requirements for a *Deep Aquifer Characterization Work Plan* in our response to Olin's 2006 Llagas Subbasin Characterization Report.

This letter does not change nor amend the requirements of Cleanup Order No. R3-2005-0014. The requirement to prepare and submit a *Llagas Subbasin Cleanup Work Plan* is pursuant to Cleanup Order No. R3-2005-0014. Pursuant to Section 13350 of the Water Code, a violation of a cleanup order made pursuant to Water Code Section 13304 may subject you to civil liability of up to $5,000 per day for each day in which the violation occurs.

We appreciate Olin's cooperation to implement an all-encompassing cleanup strategy (groundwater remediation concurrent with remaining characterization activities). We look forward to successful completion of all remaining characterization tasks and expeditious implementation of all necessary cleanup activities. If you have any questions, please contact **Hector Hernandez at (805) 542-4641** or via e-mail at Hhernandez@waterboards.ca.gov, or Harvey Packard at (805) 542-4639.

Sincerely,

Harvey Packard

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 U.S. Mail:
Olin Correspondence IPL