California Regional Water Quality Control Board
Central Coast Region

Alan C. Lloyd, PhD.
Secretary for Environmental Protection

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Arnold Schwarzenegger
Governor

March 21, 2006

Mr. Richard W. McClure
Olin Corporation
Environmental Remediation Group
P.O. Box 248
Charleston, TN 37310-0248

Dear Mr. McClure:

SLIC: 425 TENNANT AVE, MORGAN HILL; LLAGAS SUBBASIN CHARACTERIZATION WORK PLAN AND MONITORING WELL INSTALLATION REPORT

We have reviewed the two technical reports listed below:

- *Llagas Subbasin Monitoring Well Installation Report 425 Tennant Avenue, Morgan Hill, California* (Well Installation Report), prepared for Olin Corporation by MACTEC Engineering and Consulting, Inc. and dated January 16, 2006.

- *Llagas Subbasin Characterization Work Plan – Final, Olin/Standard Fusee Site, Morgan Hill, California* (Final Characterization Work Plan), prepared for Olin Corporation by MACTEC Engineering and Consulting, Inc. and dated February 3, 2006.

The above listed documents were submitted in accordance with Cleanup or Abatement Order R3-2005-0014 (Cleanup Order), issued on March 10, 2005. The Cleanup Order requires submittal of these documents as a joint submittal. However, a June 16, 2005 letter from the Water Board divided the well installation and characterization tasks into two separate submittals.

Therefore, in accordance with the Cleanup Order and Water Board's concurrence, Olin submitted a proposed monitoring well installation work plan on July 5, 2005. Subsequently, Water Board staff issued an August 3, 2005 approval letter, which authorized work plan implementation. The Well Installation Report listed above, documents implementation of the approved well installation work plan. The installation report describes the installation completion of a total of twenty-four single screen (MW) and multi-port (MP) monitoring wells at nine locations southeast of the Olin facility and continuing down the valley to just north of Highway 152, near Gilroy. The installation report specifies that the MP wells will be used to monitor groundwater aquifer zones to 300 feet below ground surface, while the MW wells will be used in borings greater than 300 feet deep. According to the installation report, the purpose of the MP and MW wells is to establish lithologic conditions, and evaluate groundwater

elevations and chemistry to assess the continuity and potential hydraulic communication of water bearing zones, groundwater flow directions, and groundwater geochemistry in the Llagas Subbasin. Additionally, the installation report summarizes the permitting information, field procedures followed, observed lithology, well construction details, and well development and surveying for each monitoring well installed.

Based on our review, we find the installation and development of all of the wells was completed as scheduled and in accordance with the August 3, 2005 approval letter. All Water Board comments and suggestions were considered and appropriately addressed. As such, we hereby accept the Well Installation Report as final.

We understand a first draft of the above listed characterization work plan was submitted on August 12, 2005. Based on Water Board comments dated September 23, 2005, the draft characterization work plan was revised and resubmitted for Executive Officer consideration on October 24, 2005. Subsequently, on December 20, 2005, Water Board staff issued a conditional approval letter concerning Olin's Characterization Work Plan. Appendix B and Appendix C to the listed Final Characterization Work Plan include Olin's complete responses to the Water Board's comments, including the additional detailed information requested pursuant to the Water Board's December 20, 2005 conditional approval letter.

In general, the characterization work plan outlines Olin's proposed Llagas Subbasin characterization process, specifies tasks the will be involved in characterization activities, and provides an implementation schedule. According to the work plan, the primary characterization goals are to (1) outline the processes and methods needed to characterize the extent of perchlorate in groundwater to support future decision-making, (2) provide the information needed to assess perchlorate movement in groundwater, (3) provide the information needed to assess the need for control of perchlorate migration, (4) provide the information to design potential control or migration measures, and (5) provide the information needed to propose a cleanup level for perchlorate in groundwater. We fully agree with the outlined characterization goals.

Based on our review, we find the proposed characterization approach outlined in the Final Characterization Work Plan is consistent with Water Board goals and expectations for site characterization and remediation. We find the Work Plan adequately addresses all comments and concerns, as detailed in our Water Board's December 20, 2005 comment letter. As such, we hereby approve the Final Characterization Work Plan as final and ready for immediate implementation. With this approval, Olin has achieved compliance with Task B and Task C of the Cleanup Order.

We understand that many of the characterization activities and tasks outlined in the subject Work Plan have already been implemented or are near completion. However, it is our position that site characterization activities are an ongoing process and will be continuously evaluated and modified as deemed necessary, based on investigation findings, site-specific conditions, and other pertinent factors.

We appreciate your sustained commitment to achieve compliance with Cleanup Order requirements. We eagerly anticipate completion and submittal of the Llagas Subbasin Characterization Report, due on March 30, 2006. 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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