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CHARLESTON, TN 37310-0248

VIA: E-MAIL AND U.S. MAIL

August 8, 2006

Roger W. Briggs
Executive Officer
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

**RE: Response to Split-Sampling and Reinstatement of Bottled Water at Well
10S03E12C006 and August 2, 2006 Letter**

Dear Mr. Briggs:

As indicated in Olin Corporation's August 4, 2006 e-mail response to the Water Board's July 27, 2006 e-mail assessment that bottled water must be reinstated for users of well 10S03E12C006 and to the Water Board's August 2, 2006 letter, Olin Corporation respectfully disagrees. Olin terminated bottled water to this well pursuant to Central Coast, Regional Water Quality Control Board (Water Board) CAO No. R3-2004-0101, as modified by the State Water Resource Control Board Order No. WQ 2005-0007 (State Board Order). The data supporting this decision were provided to the Water Board in Phase 5 of our phased terminations and are included below for your convenience.

well_name	sample_date	sample_type	event	value	units	val_qual
10S03E12C006	8/23/2005	CHEM	PWQ-05Q3	4.5	ug/l	A
10S03E12C006	11/7/2005	CHEM	PWQ-05Q4	4.8	ug/l	A
10S03E12C006	2/9/2006	CHEM	PWQ-06Q1	5.7	ug/l	A
10S03E12C006	2/9/2006	DUP	PWQ-06Q1	5.8	ug/l	A
10S03E12C006	6/21/2006	CHEM	PWQ-06Q2	4.5	ug/l	A
10S03E12C006	6/29/2006	CHEM	PWQ-06Q2	4.3	ug/l	A

These data demonstrate, pursuant the State Board Order, that all prospective analytical results were less than the 6 ppb PHG. Further, QA/QC of the data qualified the analytical results as acceptable, valid, and unbiased. Additionally, as required by the State Board Order for monitoring, a Mann-Kendall non-parametric trend analysis was conducted on the data collected and resulted in a "Potentially Decreasing" trend. The analytical data and trend analysis were provided to the Water Board supporting bottled water termination pursuant to the State Board Order.

Post termination, split-samples were collected by the Water Board, the Water District, and MACTEC from well 10S03E12C006. The analytical data from this split-sampling effort were 4.3 ppb (TestAmerica; MACTEC's sample), 5.6 ppb (TestAmerica; RWQCB's sample), 5.7 ppb (Water District's internal laboratory), and 6.6 ppb (BC Laboratory). When these split-sample results are considered as four samples of a single aliquot, which they were, then a valid approach to determine perchlorate concentration is to average the results, which results in an average perchlorate concentration of 5.6 ppb. Furthermore, because the two samples from TestAmerica were in different sample groups and had different QC recoveries, they are not directly comparable.

DHS monitoring requirement regulations at 22 CCR 64450 require that a confirmation sample be collected and analyzed as soon as possible, with the average value compared to the notification level (<http://www.dhs.ca.gov/ps/ddwem/chemicals/AL/notificationoverview.pdf>). Upon finding that the sample obtained from BC Laboratory resulted in 6.6 ppb perchlorate, Olin immediately collected an additional, confirmation sample in accordance with DHS regulations. The analytical results from Olin's confirmation sample is 5.9 ppb (results attached). When this confirmation sample result is averaged (following DHS guidelines) with Olin's result (4.3 ppb), the resulting perchlorate is 5.1 ppb

Nevertheless, we recognize the position the Water Board is in regarding the split-sample results and acknowledge the Water Board's desire to more fully understand the relevant science. To assist, Olin recommends that the Water Board and MACTEC redo the split-sampling and ensure that the two samples are submitted and analyzed in the same sample group and that the QC is done on the same sample group to be able to more directly compare the analytical results of the splits. This step will help the Water Board and Olin resolve the differences in previous split-sample results.

Finally, despite our stated disagreement with the Water Board's assessment that bottled water must be reinstated, we will temporarily provide bottled water on a voluntary basis to users of well 10S03E12C006. We respectfully request that as soon as the Board is able, that it rescind the request to provide bottled water; unnecessary per the aforementioned order and unnecessary under the application of sound science.

We look forward to working with the Water Board and MACTEC to resolve our difference of opinion on this situation. Question regarding this issue should be directed to Rick McClure at (423) 336-4576.

Sincerely,
OLIN CORPORATION

[Original Signed By]

Curt M. Richards
Vice President
Environment, Health and Safety

/attachment

/ec: Eric Gobler – RWQCB (electronic copy)
Hector Hernandez – RWQCB (electronic copy)
Rick McClure – Olin Corporation (electronic copy)
Dave Share – Olin Corporation (electronic copy)
Don Smallbeck – MACTEC (electronic copy)