# California Regional Water Quality Control Board

**Central Coast Region** 

Alan C. Lloyd, PhD.
Secretary for
Environmental
Protection

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November 2, 2005

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; REQUEST FOR AMENDMENT OF THE GENERAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR THE OLIN SITE

The Central Coast Regional Water Quality Control Board (Water Board) has reviewed Olin's request to change treated groundwater discharge locations. Olin's request and justification are contained in a Geosyntec Consultants' September 29, 2005 letter titled, "Request for Amendment of the General Waiver of Waste Discharge Requirements for the Olin/Standard Fusee Site" (Request). Olin is proposing to design and install recharge wells on the northern portion of its property. Additionally, Olin will be collecting hydrogeologic data to support its request. I have no objections to the new discharge location, and hereby amend the General Waiver enrollment letter, issued December 8, 2003, to include discharge to the proposed on-site recharge wells. However, the following conditions shall be satisfied prior to the operation of the new recharge wells:

- 1. The discharge shall comply with the attached revised Monitoring and Reporting Program No. 01-061. Monitoring and Reporting Program (MRP) No. 03-0168 is hereby rescinded. The requirements and effluent limits that were contained in MRP No. 03-0168 are henceforth contained in revised Monitoring and Reporting Program No. 01-0161. We have eliminated MRP 03-0168 in order to simplify monitoring compliance. While the Monitoring and Reporting Programs have been combined, Olin may still submit the monitoring data in separate reports.
- 2. Olin shall submit an evaluation of its current groundwater piezometric monitoring system. The evaluation shall verify that the existing piezometric network is adequately designed and constructed. Olin shall evaluate the need for additional piezometers between monitoring wells: MW-10SA1 and PM-003AR and south of extraction wells EW-002A and EW-001A and between PM-002A and PM-001A. It is important to collect piezometric data from the abovementioned areas to confirm modeling results

California Environmental Protection Agency



shown on Request Figure 3b. If your analysis indicates monitoring wells are not needed, then technical justification shall be provided.

3. Olin shall submit the results of the Phase 1, Pre-Design Data Collection investigation for

Water Board Staff's review and acceptance.

- 4. Olin shall submit the Phase 2, Engineering Design and Permitting package to Water Board staff for review and acceptance. The package shall contain a schedule for system construction and start up. Olin shall not discharge to the onsite recharge wells until the design package is deemed acceptable by the Executive Officer. Olin may perform interim recharge testing prior to Executive Officer acceptance. The Executive Officer will provide written permission to use the recharge wells.
- 5. Olin shall provide a start-up and shakedown report, including the items listed in your Request, 45 days after the startup period is completed. The length of the start up period shall be specified in the Engineering Design and Permitting design package schedule.
- 6. Olin shall continue to comply with the enrollment requirements contained in our December 8, 2003 letter not specifically amended by this action.
- 7. The amended enrollment expires on December 8, 2008.

If you have any questions, please contact David Athey at (805) 542-4644 or Eric Gobler at (805) 549-3467.

Sincerely,

Róger W. Briggs Executive Officer

Attachment: Revised Monitoring and Reporting Program No. 01-0161

cc via E-mail:

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

# Olin Interested Party List

## cc via U.S. Mail:

Mr. Jay Baksa City of Gilroy 7351 Rosanna Street Gilroy, CA 95020-6197

Mr. Eric Lacy CA Dept. of Health Services 2151 Berkeley Way Berkeley, CA 94704-1011

Mr. Richard Peekema 4817 Wellington Park Dr. San Jose, CA 95136

Mr. Keith M. Casto Sedgwick, Detert, Moran & Arnold One Embarcadero, 16th Floor San Francisco, CA 94111-3628

Mr. Jim Ashcraft City of Morgan Hill 17555 Peak Avenue Morgan Hill, CA 95037 Mr. Eugene Leung CA Dept. of Health Services 2151 Berkeley Way Berkeley, CA 94704-1011

Ms. Suzanne Muzzio Santa Clara Co. Env. Health Services 1555 Berger Drive, Suite 300 San Jose, CA 95112-2716

Mr. Rob Stern 7510 Kenbrook Place Suwanee, GA 30024

Mr. Jay McLaughlin President and CEO Standard Fusee Corporation PO Box 1047 Easton, MD 21601

Mr. Joe Root, General Manager Corde Valle One Corde Valle Club Drive San Martin, CA 95046

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# CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION

# MONITORING AND REPORTING PROGRAM NO. 2001-161 (Revised November 2, 2005) FOR OLIN CORPORATION 425 TENNANT AVENUE, MORGAN HILL SANTA CLARA COUNTY

### I. GROUNDWATER MONITORING

Prior to sampling, groundwater elevations and depth to groundwater shall be measured. Wells shall then be purged until pH, temperature, dissolved oxygen (DO), oxidation reduction potential, and electrical conductivity reach a steady state and a minimum of three casing volumes have been removed. Alternative well purging techniques, with technical justification demonstrating equivalency, may also be used. Once recovered, wells shall be sampled and analyzed in accordance with Table 1 below.

TABLE 1
SAMPLING REOUIREMENTS

WELL NO.	CONSTITUENT	UNIT	FREQUENCY
	Depth to ground water <sup>3</sup> Ground water elevation <sup>3</sup> Perchlorate (Use EPA Method 314)		Quarterly in Mar., Jun., Sep., & Dec
Onsite monitoring wells MW-1 through MW-3	Depth to ground water <sup>3</sup> Ground water elevation <sup>3</sup>	Feet Feet	Quarterly in Mar., Jun., Sep., & Dec
and MW-SW-004 through MW-SW-011,		μg/l	Quarterly in Mar., Jun., Sep., & Dec
Morgan Hill Tennant Avenue Municipal	,	100	Quarterly in Mar., Jun., Sep., & Dec
Well, newly installed monitoring wells,		4	
offsite wells 1 through 42 <sup>1</sup> (see Table 2), and all offsite domestic or			
agricultural or municipal wells with			
previous detections between 2 µg/l and 4			
$\mu g/l^2$ .			

<sup>&</sup>lt;sup>1</sup> Wells with similar location, screen interval, and flow rate may be substituted for wells that are not available for monitoring with the concurrence of the Executive Officer of the Regional Board.

## TABLE 2

45 Representative MRP Wells	09S03E26L004, 09S03E26R007, 09S03E34B005, 09S03E34C002, 09S03E34E005, 09S03E34P001, 09S03E35E006, 09S03E35G005, 09S03E35N013, 09S03E36E007, 09S03E36P003, 10S03E01A011, 10S03E01E007, 10S03E02C005, 10S03E02G002, 10S03E02K001, 10S03E03C009, 10S03E11E007, 10S03E11G001, 10S03E12C004, 10S03E12G012, 10S03E12M009, 10S03E13D001, 10S03E13K005, 10S03E14B006, 10S03E24H004, 10S04E06L008, 10S04E07E035, 10S04E07N005, 10S04E07R009, 10S04E17F011, 10S04E17N012, 10S04E18J011, 10S04E19D015, 10S04E19F008, 10S04E20L007, 10S04E20M002, 10S04E29C001, 10S04E29P002, 10S04E30G005, 10S04E30R002, 10S04E32E004, 10S04E32E005, 10S04E32E006, 10S04E32E007
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**TABLE 3**8-31-05 AMMENDED SAMPLING REQUIREMENTS

WELL	AQUIFER ZONE	CHANGE	COMMENTS
MW-02	AQUIFER A	NO	GCTS Data is a mixture of surrounding groundwater (including downgradient) and MW-02 is representative of upgradient, onsite A-zone groundwater and has a long historical data set. Groundwater elevations shall be monitored quarterly.
MW-11SA1	AQUIFER A	YES	Groundwater elevations shall be monitored quarterly.
MW-10SA1	AQUIFER A	YES	Sample Annually – Alternate sampling between periods of high and low groundwater. This well has had a recent trace detection of perchlorate, reported near recorded high groundwater elevations. Water Board staff will reconsider reducing the monitoring frequency once additional data is collected. Groundwater elevations shall be monitored quarterly.
MW-11SA2	INTERMEDIATE BI	YES	Sample Annually – Alternate sampling between periods of high and low groundwater. This well has had a recent detection of perchlorate at 4.0 µg/L, reported near recorded high groundwater elevations. Water Board staff will reconsider reducing the monitoring frequency once additional data is collected. Groundwater elevations shall be monitored quarterly.
MW-07SA3	INTERMEDIATE B2	YES	Sample Annually – Alternate sampling between periods of high and low groundwater. This well has had a recent trace detection of perchlorate at 3.1 µg/L, reported near recorded high groundwater elevations. Water Board staff will reconsider reducing the monitoring frequency once additional data is collected. Groundwater elevations shall be monitored quarterly.

 $<sup>^2</sup>$  Monitoring is required as additional wells with perchlorate detections between 2  $\mu$ g/l and 4  $\mu$ g/l are identified. The Executive Officer may require sampling of additional wells to assess the variability of perchlorate over time, concentration trends, and lateral and vertical plume migration. If the vertical distribution of perchlorate cannot be determined with the existing network of monitoring wells, multiple screened monitoring wells may be needed.

<sup>&</sup>lt;sup>3</sup> Required for all monitoring wells and for those domestic and agricultural wells with wellhead access for measuring water levels.

WELL	AQUIFER ZONE	CHANGE	COMMENTS
MW-07SA4	INTERMEDIATE B3	YES	Sample Annually – Alternate sampling between periods of high and low groundwater. This well has had a recent trace detection of perchlorate at 3.8 µg/L, reported near recorded high groundwater elevations. Water Board staff will reconsider reducing the monitoring frequency once additional data is collected. Groundwater elevations shall be monitored quarterly.
OW-01C	DEEP AQUIFER C	YES	Sample Annually – Alternate sampling between periods of high and low groundwater. This well had a 4.2 μg/L detection of perchlorate in October 2004, reported near low groundwater elevations. Water Board staff will reconsider reducing the monitoring frequency once additional data is collected. Groundwater elevations shall be monitored quarterly.

- A. SAMPLE PROCUREMENT LIMITATIONS: For any given monitored medium, the samples taken from all Monitoring Points satisfying the data analysis requirements for a given Monitoring Period shall be taken within a span not exceeding 30-days, in a manner that ensures sample independence to the greatest extent feasible. A minimum of one sample shall be obtained from each Monitoring Point during each corresponding Monitoring Period.
- B. GROUNDWATER FLOW RATE AND DIRECTION: For each monitored groundwater body, the water level in each well shall be measured, at least quarterly, including the times of expected highest and lowest elevations of the water level. Horizontal and vertical gradients, groundwater flow rate and direction for the respective groundwater body shall also be determined. Groundwater elevations for all wells in a given groundwater body shall be measured within a period of time short enough to avoid temporal variations in groundwater flow which could preclude accurate determination of groundwater flow rate and direction. The observed groundwater characteristics shall be compared with those of previous determinations, noting the appearance of any trends, and of any indications that a change in the hydrogeologic conditions beneath the site has occurred. This information shall be reported in the Semi-annual Monitoring Reports.
- C. RECORDS TO BE MAINTAINED: Written records shall be maintained by Olin's laboratory(s), and shall be retained for the duration of the cleanup activities. This period of retention shall be extended during the course of any unresolved litigation regarding this cleanup or when requested by the Executive Officer. Such records shall show the following for each sample:
  - 1. Identity of sample and of the monitoring point from which it was taken, along with the identity of the individual who obtained the sample.
  - 2. Date and time of sampling.
  - 3. Date and time that analyses were started and completed, and the name of the personnel performing each analysis.
  - 4. Complete procedure used, including method of preserving the sample, and the identity and volumes of reagents used.
  - 5. Chromatographs and calculation of results.
  - 6. A complete chain of custody logs.
  - 7. Results of analyses, and the Method Detection Limit and Practical Quantitation Limit for each analysis.

#### D. REPORTING

- 1. FREQUENCY: Monitoring reports shall be submitted quarterly to the Regional Board by the 30<sup>th</sup> day of January, April, July, and October and shall contain information collected during the previous quarter (October-December, January-March, April-June, July-September). The reports shall include the following:
- 2. GROUNDWATER MONITORING REPORTING LETTER OF TRANSMITTAL: A letter summarizing the groundwater monitoring results shall accompany each report. Such letter shall include a discussion of any violations found since the last report was submitted, and shall describe actions taken or planned for correcting those violations. If detailed time schedule has been previously submitted for correcting violations, a reference to the schedule will be satisfactory. If no violations have occurred since the last submittal, this shall be stated in the letter of transmittal. Monitoring reports and the letter transmitting the monitoring reports shall be signed by a principal executive officer at the level of vice president or above, or by his/her duly authorized representative, if such a representative is responsible for the overall operation of the facility. The letter shall contain a statement by the official, under penalty of perjury, that to the best of the signers' knowledge the report is true, complete, and correct. In addition, the report shall be signed and stamped by a State of California licensed Civil Engineer, Geologist, or Engineering Geologist attesting, under penalty of perjury, that the report is true and accurate.
- 3. COMPLIANCE EVALUATION SUMMARY: The compliance evaluation summary shall contain the following information:
  - a. Determination of the velocity and direction of groundwater flow: For each monitored groundwater body, a description and graphical presentation of the velocity and direction of groundwater flow under/around the facility, based upon water level elevations taken during the collection of the water quality data submitted in the Monitoring Report (i.e., groundwater elevation contour map for each water-bearing zone, beneath and adjacent to the facility). The analysis shall include a discussion of how observed groundwater rate, flow, and direction compare with those from previous determinations, the appearance of any trends, and any other items which may indicate a potential change in the hydro-geological conditions beneath and adjacent to the facility.
  - b. Pre-Sampling Purge: For each monitoring point addressed by the report, a description of the method and time of water level measurement, the type of pump used for purging and the placement of the pump in the well, and the method of purging (the pumping rate, the equipment and methods used to monitor field pH, temperature, and conductivity during purging, the calibration of the field equipment, results of the pH, temperature, conductivity, dissolved oxygen, and turbidity testing, the well recovery time, and the method of disposing of the purge water).
  - c. Sampling: For each Monitoring Point addressed by the report, a description of the type of pump, or other device used, its placement for sampling, and a description of the sampling procedure (number of samples, field blanks, travel blanks, and duplicate samples taken; the type of containers and preservatives used; the date and time of sampling; the name and qualifications of the person actually taking the samples; and a description of any anomalies).

- 4. DISCUSSION: A comprehensive discussion of compliance with the Cleanup or Abatement Order No. R3-2005-0014, and on and offsite cleanup operations progress. Include a summary of the groundwater analyses indicating any changes made since the previous report. Include a summary of corrective action results and milestones, and a review of construction projects with water quality significance completed or commenced in the past year or planned for the upcoming year.
- 5. AFFECTED PERSONS: An updated listing of all persons who either own or reside upon the land that directly overlies any part of the plume (affected persons). The listing must include contact information for all affected persons including but not limited to address, phone number, and other pertinent information. The listing must also include the date on which the affected persons were last updated regarding the existing groundwater plume(s). Note: Annual updates of plume information are required to be sent to affected persons each January 30<sup>th</sup>.
- 6. CORRECTIVE ACTION SUMMARY: Discuss significant aspects of any corrective action measures performed during the monitoring period. Calculate load removed from the sites' impacted media (groundwater) by mass removal system(s). Mass removal calculations shall be based on actual analytical data. Present discussion and indications, relating mass removal data to the violation the corrective action is addressing.
- 7. GRAPHICAL PRESENTATION OF DATA: All analytical data must be presented in graphical format for each Monitoring Point. Each such graph shall plot the concentration of one or more constituents over time, at a scale appropriate to show trends or variations in water quality. Graphs shall plot each datum, rather than plotting mean values. For any given constituent or parameter, the scale for background plots shall be the same as that used to plot down-gradient data. For each groundwater body monitored, graphical presentation shall also include iso-concentration contours and computer modeling of all significant plumes detected, as outlined in 8, below.
- 8. MAP: All monitoring reports shall include the following maps:
  - a. A map or aerial photograph clearly showing the locations of all Monitoring Points. Monitoring points shall be labeled.
  - b. For each groundwater body monitored, a map depicting groundwater contours and flow directions to the greatest degree of accuracy possible.
  - c. A separate plume map shall be provided for each formation (groundwater bearing zone) showing the extent of known contamination, defining monitoring points, and groundwater flow direction.
- 9. FIELD DATA: Tabular field sampling data for each well sampled, such as volume of purge water, time, pH, temperature, DO, oxidation reduction potential, and electrical conductivity;
- 10. LABORATORY RESULTS: Laboratory statements, concerning the results of all analyses, demonstrating compliance with the most recently approved Sampling & Analyses Plan. Additionally, the results of all sampling and analyses performed outside

the requirements of this Monitoring and Reporting Program, shall be summarized and reported. The following information shall also be presented:

- a. All laboratory analytical data (a complete data history of all groundwater laboratory analytical data from each Monitoring Point) and appendices shall be presented in electronic format (compact disk in PDF format or another file format acceptable to the Executive Officer). A paper copy of the previous two years of groundwater monitoring data shall be provided in tabular form. Original laboratory analytical reports shall be maintained and made available upon request.
- b. The evaluation and interpretation of all available data.
- c. Tabular historic and current groundwater elevation and depth to groundwater data in monitoring wells, and groundwater flow direction in each identified groundwater zone. Numeric data shall be submitted in spreadsheet format using Excel or equivalent program (electronic data using floppy disk or other acceptable medium) to facilitate data analysis.
- d. Groundwater elevation contour map for each water-bearing zone.
- e. Copy of sampling log (record) for each well.
- 11. Construction data for each well sampled such as well ID, casing diameter, casing material, boring diameter, total depth, top of casing elevation, screen interval location, and sand pack interval location in tabular form

# E. RELEASE BEYOND FACILITY BOUNDARY

Any time a release from the facility has proceeded beyond the facility boundary, all persons who either own or reside upon the land that directly overlies any part of the plume (affected persons) shall be notified.

- 1. Initial notification to affected persons shall be accomplished within 14 days of making this conclusion and shall include a description of the current knowledge of the nature and extent of the release.
- 2. Subsequent to initial notification, all affected persons including any persons newly affected by a change in the boundary of the release, shall be provided updates within 14 days of concluding there has been any material change in the nature or extent of the release.
- 3. All affected persons shall be provided an update within 30-days of receipt of this monitoring and reporting program. Annual updates shall be provided by January 30<sup>th</sup> of each year.
- 4. All notifications to all affected persons shall include (at a minimum) the following information:
  - a. A summary of the release and corrective action information.
  - b. Contact information (i.e., Olin Corporation, Water Board, Santa Clara Public Health Department, Santa Clara Valley Water District).
  - c. The results of most recent monitoring data and its availability.
- 5. Within seven days of sending each notification to affected persons, the Regional Board shall be provided with both a copy of the notification and a current mailing list of all affected persons.

# F. NOTIFICATION REQUIREMENTS

- 1. Olin shall notify the Executive Officer within 24 hours by telephone and within 14 days in writing, of:
  - b. Any noncompliance potentially or actually endangering health or the environment.
  - c. Any flooding, equipment failure, or other change in site conditions which could impair the integrity of the site or any portion thereof, or of precipitation and drainage control structures.
- 2. The Discharger or persons employed by the Discharger shall comply with all notice and reporting requirements of the State Department of Water Resources and with concurrence of the Executive Officer regarding the construction, alteration, destruction, or abandonment of all monitoring wells used for compliance with this monitoring program, as required by §13750.5 through §13755 and §13267 of the California Water Code.

# II. SOIL REMEDIATION MONITORING

Groundwater, vadose zone and soil monitoring locations shall be monitored as outlined in Table 4. Reporting shall be in accordance with Section I.D, as applicable.

**TABLE 4** 

MONITORING TYPE	LOCATION	CONSTITUENT	FREQUENCY
Soil Moisture Probes/ Lysimeters	LM-001 LM-002 LM-003 LM-004 LM-005 LM-006 LM-007 LM-008 LM-010 LM-011 LM-011 LM-012 LM-013 LM-014 LM-015	Electron Donor, Perchlorate, Bromide	Lysimeters: Monthly during startup/Quarterly thereafter Moisture Probes: Daily, Downloaded Monthly
Groundwater Wells	MW-015	Electron Donor, Perchlorate,	Quarterly (When groundwater is present) Mar., Jun., Sep., & Dec
	MW-016	Bromide, Anions, Dissolved Iron, Manganese, Field Measurements <sup>1</sup> ,	Monthly: Groundwater Elevations

MONITORING TYPE	LOCATION	CONSTITUENT	FREQUENCY
	MW-018	Groundwater Elevations	

<sup>&</sup>lt;sup>1</sup>Field measurements shall include pH, temperature, conductivity, dissolved oxygen and oxidation-reduction potential.

# III. GROUNDWATER TREATMENT SYSTEM MONITORING

Containment and treatment of the onsite perchlorate-contaminated groundwater will be achieved through the operation of a groundwater extraction and an ion-exchange treatment system. Onsite perchlorate-contaminated groundwater will be extracted by extraction wells and pumped to a 10,000-gallon equalization tank. The water from the tank will be pumped through a bag filter and then through two ion exchange vessels in series. The effluent will be discharged into a 10,000-gallon storage tank and then by gravity to a storm drain inlet adjacent to the site on Tennant Avenue. A drawing showing the groundwater treatment system is located in Olin's 90% Design Report for On-Site Containment and Treatment of Perchlorate in Groundwater, dated October 24, 2003, is hereby incorporated by reference. The pond serves as an infiltration/evaporation basin for storm water generated by this part of the City of Morgan Hill.

The volume and flow rate of water extracted from the extraction wells and the treatment system effluent discharge shall be measured continuously. A treatment system operational log shall be maintained documenting periods of system operation, shutdown and maintenance.

A. DATA COLLECTION: Representative samples shall be collected and analyzed from the following points:

Discharge from the equalization tank for the combined influent shall be analyzed for perchlorate, pH, temperature, conductivity, total dissolved solids (TDS) dissolved oxygen (DO), oxidation-reduction potential (ORP), chlorate, chloride, nitrate, nitrite, phosphate, and sulfate weekly for the first month after startup or until parameters stabilize and monthly thereafter.

- 1. Discharge from the lead ion-exchange vessel shall be analyzed for perchlorate, pH, temperature, conductivity, TDS, DO, ORP, chlorate, chloride, nitrate, nitrite, phosphate, and sulfate weekly for the first month after startup or until parameters stabilize and monthly thereafter.
- 2. Discharge from the effluent storage tank discharge to the storm drain shall be analyzed for perchlorate, pH, temperature, conductivity, TDS, DO, ORP, chlorate, chloride, nitrate, nitrite, phosphate, and sulfate weekly for the first month after startup or until parameters stabilize and monthly thereafter.
- 3. In addition, lead, total chromium, manganese, organochlorine pesticides and halogenated volatile organic compounds shall be analyzed every six months during the first year of operation and annually thereafter.

# B. GROUNDWATER TREATMENT SYSTEM REPORTING

Monitoring reports shall be submitted quarterly on the 30<sup>th</sup> day of January, April, July, and October and shall contain information collected during the previous quarter (October-December, January-March, April-June, July-September). The reports shall include the following:

- 1. Analytical results arranged in a tabular format showing current and historical data. The table at a minimum shall include: sampling date, sample location, analytical results with appropriate units, reporting limits, analytical method used, and current state and/or federal drinking water action levels and regulatory standards.
- 2. Copy of the treatment system operational log.
- 3. Daily and monthly volume and flow rate data for the extraction and recharge wells. Storm drain effluent discharge is also included if the flow is diverted to the Butterfield retention basin.
- 4. Two-dimensional groundwater flow maps showing groundwater surface iso-contours.
- 5. Copies of certified analytical reports and chain of custody forms for all analyses.
- 6. An evaluation and interpretation of all available data.

The monitoring reports shall be signed by a principal executive officer of the company of at least the level of a vice president or their "duly authorized representative." In addition, the report shall be signed and stamped by a State of California licensed Civil Engineer, Geologist, or Engineering Geologist attesting, under penalty of perjury, that the report is true and accurate.

# IV. LEGAL FINDINGS

The Regional Board requires Olin Corporation to submit the monitoring reports in accordance with Section 13267 of the Water Code to determine if the discharge complies with the General Waiver conditions for Treated Groundwater contained in the Regional Board Resolution R3-2002-0115. More detailed information is available in the Regional Board's public file on this matter.

The Regional Board requires Olin Corporation to submit the groundwater and soil treatment monitoring reports in accordance with Section 13267 of the Water Code to determine the concentrations and movement of the perchlorate plume in the vicinity of the Olin site. We require Olin Corporation to submit the monitoring reports as the owner of the property and one of the previous operators of a flare manufacturing facility that caused soil and groundwater perchlorate contamination at and in the vicinity of the Olin site at 425 Tennant Avenue, Morgan Hill. More detailed information is available in the Regional Board's public file on this matter.

Copies of all correspondence, technical reports, and other documents pertaining to compliance with this order shall be provided in electronic (i.e. Adobe PDF, Excel) and hardcopy format at time they are submitted to the Regional Board. This includes data submission to Geotracker and direct electronic data submission from Olin's laboratory.

ORDERED BY:

Roger W. Briggs

Executive Officer

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Date