



California Regional Water Quality Control Board

Central Coast Region



Alan C. Lloyd, PhD.
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

June 16, 2005

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

Dear Mr. McClure:

SLIC: PARTIAL APPROVAL, LLAGAS SUBBASIN MONITORING PLAN, 425 TENNANT AVENUE FACILITY, MORGAN HILL, SANTA CLARA COUNTY

Regional Water Board staff has reviewed the *Llagas Subbasin Monitoring Plan* (Monitoring Plan), received on April 11, 2004. Olin Corporation (Olin) submitted the Monitoring Plan to comply with Cleanup or Abatement Order No. R3-2005-0014 (CAO). The Monitoring Plan details Olin's recommendations for delineation and monitoring of the 10-mile long perchlorate plume emanating from Olin's property. Regional Water Board staff provided questions and comments to Olin to facilitate a Monitoring Plan discussion meeting held on June 8, 2005. In addition, Regional Water Board staff received and reviewed comments from the Santa Clara Valley Water District (Water District) and the City of Gilroy (City).

The June 8th meeting was held to discuss Regional Water Board, Water District and City Monitoring Plan comments. Regional Water Board, Olin, Water District and Komex staff attended this meeting. Based on our review and information gathered at the meeting, we find that the Monitoring Plan is incomplete and additional information is required before Regional Water Board Staff can approve the entire Monitoring Plan. Regional Water Board staff hereby grant partial Monitoring Plan approval based on information exchanged during at the meeting and subsequent follow-up information provided in emails from Olin on June 14, 15 and 16, 2005. The follow-up information consists of the following tasks and dates:

TABLE 1 – ADDITIONAL TASKS			
TASK	BY:	DATE:	COMPLETED ON
Send proposed well location for dedicated monitoring well in the vicinity of Church Ave to the Water Board.	MACTEC	June 13, 2005	June 13, 2005
Develop figure and table of all perchlorate sampling data at leading edge of plume.	MACTEC	June 17, 2005	PENDING
Update Table 2 with screen length data.	MACTEC	June 17, 2005	PENDING

California Environmental Protection Agency



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TASK	BY:	DATE:	COMPLETED ON
Send e-mail with link to web site for Mann-Kendall to the Water Board.	MACTEC	June 10, 2005	June 10, 2005
Develop list of high volume wells in Gilroy area for Water Board staff approval.	MACTEC/Water District	June 17, 2005	PENDING
Provide lithologic data of newly installed wells and water quality data for all shallow wells to MACTEC.	Water District	June 15, 2005	PENDING
Request City of Gilroy cooperation in obtaining well construction and testing information.	Water Board/Komex	June 9, 2005	June 9, 2005
Evaluate the necessity for testing (depth discrete sampling, velocity logging) selected monitoring network production wells concurrent with dedicated monitoring well installation activities.	Olin/MACTEC	After Dedicated Monitoring Well Installation	June 15, 2005

It is not necessary for the above-described tasks to be completed and accepted before Olin starts the monitoring well installation work outlined in the Monitoring Plan. Therefore, Regional Water Board staff is granting partial Monitoring Plan approval, specifically for the installation of the dedicated monitoring wells. Olin has proposed to install nine monitoring wells, mainly down the plume's centerline. According to the CAO, Olin is required to submit a *Monitoring Well Installation and Characterization Work Plan* (Work Plan) on June 3, 2005. Olin has requested a submittal date extension, which is discussed in our June 13, 2005 letter to you. Regional Water Board staff request that the monitoring well installation portion of the Work Plan be submitted forthwith, since it was originally due on June 3, 2005. As we discussed in our June 13, 2005 letter, this portion of the Work Plan should be submitted within 15 days. Since the July 4th holiday weekend starts July 2nd, we expect Olin to submit the Work Plan by **July 5, 2005**.

Regional Water Board staff will issue an acceptance letter for the remaining Monitoring Plan issues, once they are resolved to our satisfaction. Remaining issues include submittal of additional information to resolve Gilroy sentinel monitoring well concerns, monitoring of the southern plume extents, information on high volume water users, submittal of additional well data, and characterization of supply wells. We look forward to a timely response and resolution to these issues.

As you are aware, a meeting is scheduled for June 20, 2005, to discuss the characterization portion of the Work Plan. This will be the second meeting regarding Llagas subbasin characterization. We anticipate that any remaining issues will be resolved in that meeting, or shortly thereafter, so that Olin can also submit the characterization portion of the Work Plan.



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

Sincerely,

Roger W. Briggs
Executive Officer

cc via E-mail:

Olin Interested Party List

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

cc via U.S. Mail:

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