



California Regional Water Quality Control Board

Central Coast Region



Terry Tamminen
Secretary for
Environmental
Protection

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Phone (805) 549-3147 • FAX (805) 543-0397

Arnold Schwarzenegger
Governor

October 8, 2004

Mr. Rick McClure
Environment, Health and Safety
Olin Corporation
PO Box 248
Charleston, TN 37310-0248

Dear Mr. McClure:

SLIC: 425 TENNANT AVENUE, MORGAN HILL; GROUNDWATER FLOW ASSESSMENT REPORT, OLIN/STANDARD FUSEE SITE, MORGAN HILL, SANTA CLARA COUNTY

Regional Board staff is reviewing Olin Corporation's Groundwater Flow Assessment Report (Report), submitted September 10, 2004. In addition we have reviewed comments from Komex Inc., [submitted on behalf of the City of Morgan Hill (City)] and the Santa Clara Valley Water District (SCVWD). We have also considered comments and information discussed during our September 22, 2004, meeting in Morgan Hill. On this note, we appreciate your willingness to include the City and the SCVWD in technical meetings and discussions. As you are aware, the City and SCVWD are very concerned about perchlorate detections in supply wells northeast of Olin's property. We believe these joint meetings provide an excellent opportunity to discuss these important issues and work toward solutions.

In order to complete our Report review, please submit the following information:

1. A map clearly showing and identifying all the wells listed in the table on page 14. These wells could be placed on Figure 1, or a new figure or map can be submitted.
2. The upper, middle and lower aquifer zones are referenced but not well defined. Please provide a clear explanation of these zones and their locations relative to the study area.
3. Significant off-line projections of well data on Plate 3 "Fence Diagram" are apparent. If relevant data exist in the off-line wells, we request that fence diagrams be submitted for wells on those lines. Additionally, indicate the upper, middle and deeper groundwater zones on your fence diagrams.
4. The Report relies on groundwater modeling to demonstrate groundwater has not had any northeast flow component. To fully evaluate the modeling results, submit the groundwater modeling input parameters and

California Environmental Protection Agency



Item No. 12 Attachment No. 1
December 3, 2004 Meeting
Perchlorate Sites

documentation including but not limited to: model assumptions, initial and boundary conditions with defined input parameters, documentation of model calibration and an explanation of model relevance and limitations.

5. Submit well construction details that were used to generate fence diagrams or for wells the report references. According to Report page 6, 20 well logs were utilized. Since some well logs may be confidential and not subject to public disclosure, we will keep them out of the public file. Please alert us to which logs are confidential.


Lastly, we want to clarify our position regarding the Northeast Flow Assessment Report, specifically in regard to a statement made by you at our September 22 meeting. You mentioned several times that the purpose of the Report's Phase I investigation has always been to determine if additional work is needed beyond the Phase I results. It is our understanding from the September 22nd meeting that Olin believes it has satisfied all of its requirements and does not plan to conduct further work. It is not our position nor our understanding that Phase II work would only be started based on the Phase I investigation results. Our position is reflected in our February 19, 2004, *Ground Water Flow Assessment Workplan* Approval letter, which states "As we understand, once Olin's data acquisition and analysis is complete, Mr. McClure will arrange a meeting with us to present initial results and present final well locations and details." At this point we still expect Phase II to be initiated. Once we receive your response we will consider your request to be relieved from further responsibilities. Please be aware that should Regional Board staff find your Phase I Report findings inconclusive you will need to move forward with Phase II work plan implementation. Since the Phase I results have been delayed, we will likely require an expedited schedule for Phase II implementation.

Pursuant to Section 13267 of the California Water Code, Olin is required to provide the above-requested information by **October 18, 2004**. Failure to submit adequate or complete information may subject you to a Regional Board enforcement action based on the original due date of the Groundwater Flow Assessment Report, October 10, 2003. The Regional Board requires Olin Corporation to submit the additional information cited above 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 information 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.

Any person affected by this action of the Regional Board may petition the State Water Resources Control Board (State Board) to review the action in accordance with section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The State Board must receive the petition within 30 days of the date of this order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

Should you wish to discuss this letter or other related matters, 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:

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

Jim Ashcraft
City of Morgan Hill

Rich Chandler
Komex

Peter Forest
San Martin County Water

Steven L. Hoch
Hatch & Parent

Bill O'Braitis
MACTEC

Sylvia Hamilton
PCAG

Mr. Tom Mohr
Santa Clara Valley Water District

PCAG Members

Elected Officials

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cc via U.S. Mail:

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2003 Comment Letter.doc

California Environmental Protection Agency





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Central Coast Region



Terry Tamminen
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Arnold Schwarzenegger
Governor

October 15, 2004

Mr. Rick McClure
Environment, Health and Safety
Olin Corporation
PO Box 248
Charleston, TN 37310-0248

Dear Mr. McClure:

SLIC: 425 TENNANT AVENUE, MORGAN HILL; GROUNDWATER FLOW ASSESSMENT REPORT, OLIN/STANDARD FUSEE SITE, MORGAN HILL, SANTA CLARA COUNTY

Regional Board staff have considered your request to change the information submittal due date contained in our October 8, 2004, *Groundwater Flow Assessment Report* comment letter. The current due date is October 18, 2004. You have requested a new due date because of the absence of several key Olin and MACTEC personnel and the time required for Olin to conduct it's internal review process. As we understand, you have proposed a new due date of October 29, 2004. After careful consideration, we have decided to accept this date for information submittal. Please be aware that further date changes will not be granted.

We are looking forward to receiving and reviewing the information we have requested. Should you wish to discuss this letter or other related matters, please contact David Athey at (805) 542-4644 or Eric Gobler at (805) 549-3467.

Sincerely,

For.

Roger W. Briggs
Executive Officer

cc via E-mail:

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

Jim Ashcraft
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7351 Rosanna Street
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