



California Regional Water Quality Control Board

Central Coast Region



Terry Tamminen
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

May 19, 2004

Mr. Curt M. Richards
Olin Corporation
Vice President
Environment, Health & Safety
PO Box 248
Charleston, TN 37310-0248

Dear Mr. Richards:

SLIC: 425 TENNANT AVENUE, MORGAN HILL; APRIL 30TH TENNANT WELL RESPONSE LETTER FROM CURT RICHARDS

Regional Board staff has reviewed your response to our Tennant well letter, dated April 30, 2004. Your response outlines Olin's technical and non-technical position regarding The City of Morgan Hill (City) Tennant well operation. The letter's technical assertions lacked data or information that would substantiate your claims. During a May 18, 2004 meeting, with you and Rick McClure, Mr. McClure indicated that a technical justification was provided previously. If so, we ask that you clarify what and when such information was provided. At this point, we consider your April 30, 2004, response inadequate for reasons indicated below. We ask that you review our letter and submit your response forthwith.

Several technical assertions were included in your April 30, 2004 letter; however, technical data supporting your position was not. Your letter states that in early 2002, Olin asked the City to consider using wellhead treatment on the Tennant well. Yet, Olin now objects to Tennant well operation because of concerns with pulling perchlorate deeper into the Aquifer and interference with the onsite containment and treatment system. Olin's groundwater monitoring reports document downward vertical gradients in all aquifer zones. Since last year, the Tennant well has been shut down and the potential exists for deeper zone contamination regardless of the Tennant well's operational status. It appears that operating the Tennant well may actually provide containment of these deeper zones since perchlorate impacted water is currently migrating downward, especially if well pumping continues.

You also assert that the onsite groundwater containment and treatment system could not be reasonably designed to counteract the impact of the large volume of groundwater extracted by the Tennant well. However, your response did not include an estimate of how much groundwater the Tennant well operation would extract from the B1 intermediate zone or which specific zone the Tennant well gravel pack extends into. For instance, Plate 11,

California Environmental Protection Agency



Item No. 12 Attachment No. 2
July 9, 2004 Meeting
Perchlorate Sites

North-Southwest Onsite Fence Diagram, included in your Fourth Quarter 2003 Groundwater Monitoring Report, shows that the gravel pack's upper 10 feet is located in silts and clays that lie between the B2 and B3 aquifer zones. Based on your fence diagram, it appears unlikely that a significant amount of groundwater would be extracted from that specific gravel pack location. The lack of upper B1 zone extraction appears to be confirmed by Komex's *Test Pumping, Downhole Testing, And Discrete-Depth Sampling of Tennant Well, Morgan Hill, California* report, which shows that only 95 gpm of the wells total flow rate (470 gpm) originates from the 190 – 212 feet below ground surface elevation. This flow rate equates to approximately 24% of the wells capacity and according to information you have submitted, this depth interval corresponds to the deeper B3 aquifer zone, not the B1 zone where extraction is taking place. Therefore, an adequate technical justification shall be submitted forthwith for our review justifying your technical assertions that the onsite groundwater treatment and containment system could not be reasonably designed to counteract Tennant well pumping. Your response shall include any technical data supporting your position, including groundwater modeling results and other pertinent information. If you believe such information was submitted previously, please indicate specifically which information you reference.

You are required to provide the above-requested information forthwith. Failure to submit adequate or complete information may subject you to a Regional Board enforcement action back to the Original due date of April 30, 2004. The original request was made in accordance with Water Code Section 13267 and additional information is needed to address that request. Should 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:

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

Mr. Jim Ashcraft
City of Morgan Hill

Mr. Rich Chandler
Komex

Mr. Peter Forest
San Martin County Water

Mr. Steven L. Hoch
Hatch & Parent

Mr. Bill O'Braitis
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