



California Regional Water Quality Control Board Central Coast Region



Alan C. Lloyd, PhD.
Secretary for
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Protection

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Arnold Schwarzenegger
Governor

May 16, 2005

Via Facsimile and Mail
State Water Resources Control Board
Attn: Ms. Debbie Irvin
Clerk to the Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Chairman Baggett and Board Members:

SLIC: 425 TENNANT AVENUE, MORGAN HILL; CENTRAL COAST WATER BOARD RESPONSE TO MAY 6, 2005 DRAFT STATE WATER BOARD ORDER, CONCERNING CLEANUP AND ABATEMENT ORDER NO. R3-2004-0101, SWRCB/OCC FILES A-1654 AND A-1654(a)

Central Coast Water Board staff appreciate the opportunity to comment on the State Water Resources Control Board's (State Water Board) May 6, 2005 Draft Order (Draft Order) concerning the Central Coast Regional Water Quality Control Board's (Central Coast Water Board) Cleanup and Abatement Order No. R3-2004-0101¹ (CAO R3-2004-0101). We appreciate your consideration of and responsiveness given to comments we, other Regional Water Boards and the public made on the previous Draft State Water Board Order.

Our goal remains that people with water supply wells affected by the Olin Corporation and Standard Fusee Corporation (Dischargers) perchlorate discharge will continue to receive safe replacement water until proper aquifer restoration is completed. In this regard, we believe the May 6, 2005 Draft Order is a significant improvement to the previous Draft Order. Although we still believe the replacement water "trigger" level should be below any public health level, we believe the Draft Order, coupled with appropriate monitoring (attached to the Draft Order) provides reasonable health protection.

One correction that must be made to the Draft Order is as follows:

Page 9, Directive 3 - We believe there is a typographic error in this paragraph, since the current language allows the Dischargers to stop replacement water if wells test *above* the PHG. We recommend that "less" be substituted for "greater" in the first sentence at the top of page 9, as follows:

¹ Incorrectly numbered R4-2004-0101 when originally issued.

California Environmental Protection Agency



Item No. 4 Attachment No. 2
July 7-8, 2005 Meeting
Perchlorate Cleanup Sites

“Dischargers may stop supplying interim uninterrupted water service upon the Regional Board Executive Officer’s concurrence that long term uninterrupted water service has been provided to individual well owners or there have been four consecutive quarters of ~~greater~~ less than 6 ppb results.”

Again, we appreciate the opportunity to comment on the Draft Order. We remain committed to groundwater users in the Llagas Sub-basin to ensure that conditions of the final State Water Board Order be implemented fully and that public health be protected. We are also committed to working with the Dischargers to resolve any related issues that may arise.

If you have any questions, please call David Athey or Eric Gobler of my staff at (805) 542-4644 or (805) 549-3467, respectively.

Sincerely,



Roger W. Briggs
Executive Officer

cc via E-mail:

Olin Interested Party List

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cc via U.S. Mail:

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