



**Environmental Remediation Group  
3855 North Ocoee Street, Suite 200  
Cleveland, TN 37312**

**VIA: E-MAIL and U.S. MAIL**

June 10, 2008

Mr. Hector Hernandez  
California Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, California 93401

**Subject: Progress Report #70  
May 1 through 31, 2008  
425 Tennant Ave  
Morgan Hill, California**

Dear Mr. Hernandez:

Pursuant to the November 18, 2002, California Regional Water Quality Control Board, Central Coast Region (Water Board) letter, this report summarizes Olin's progress related to the Cleanup and Abatement Order (CAO) and the Monitoring and Reporting Program (MPR) associated with the Olin/Standard Fusee site located at 425 Tennant Avenue, Morgan Hill, California.

### **Replacement Water and Domestic Ion Exchange**

#### Replacement Water:

Olin continues to provide replacement water in accordance with the Water Board CAO, as revised by the State Board in its Order No. WQO 2005-0007 (State Board Order). When the State Board Order was issued (May 2005), Olin provided replacement water to over 900 households; currently, we provide replacement water to 131. We also continue monitoring these domestic wells pursuant to the State Board Order.

Perchlorate concentrations continue to decline throughout southern Santa Clara County, resulting in fewer wells requiring replacement water and reduced sampling frequencies. In accordance with the State Board Order, and with Water Board approval, replacement water has been discontinued at 605 wells. On May 22, Olin requested revised monitoring frequencies for 10 domestic wells.

#### Domestic Ion Exchange (IX):

Through May 2008, all domestic supply wells above 7.9 ppb perchlorate have IX systems installed; with the exception of two wells where we are evaluating IX treatment options (e.g. domestic IX system or municipal connection). Olin continues to operate and maintain IX systems on 12 domestic wells; the systems continue to remove perchlorate as designed. Bottled water is also provided pending California Department of Public Health (CDPH) response to the Demonstration Protocol results for the demonstration IX systems. Two domestic IX systems have been removed from service as replacement water is no longer necessary pursuant to the State Board Order; one system is off-line because the property is vacant.

#### CDPH Demonstration Project Status

**Item No. 8 Attachment No. 2  
Cleanup Cases - Olin  
July 11, 2008 Meeting**

CDPH conducted an internal review of the demonstration project on April 24 and on April 25 met with other stakeholders, including the Santa Clara County Health Department and Santa Clara Valley Water District. Following this meeting, on May 8 CDPH provided a list of questions regarding the demonstration project. Siemens' response to their questions was provided May 30; CDPH response is pending.

### **Llagas Subbasin Characterization and Remediation**

#### Llagas Subbasin Characterization

Deep aquifer characterization efforts are ongoing. A deep aquifer characterization update and recommendation was submitted in the *Area 1 Plume Migration Control FS Addendum and Intermediate Aquifer Cleanup Work Plan* (FSA). On May 13, the Water Board concurred with Olin that the upper and middle deep aquifer characterization is complete. The Water Board also agreed with Olin's recommendations to install monitoring wells at three locations in the lower deep aquifer. On May 29, Olin presented a summary of deep aquifer characterization efforts to PCAG.

#### Llagas Subbasin Remediation:

On January 29, 2008, Olin submitted the *2007 Annual Cleanup Status Report* to the Water Board. The Annual Status Report is under Water Board review.

Pursuant to CAO Paragraphs E.3 and E.4, on April 15 Olin submitted the FSA with final conceptual design for the Intermediate Aquifer Containment System (IACS). On May 13, the Water Board concurred with: i) bifurcation of the intermediate aquifer remediation design from the deep aquifer, ii) the preliminary design for the IACS, iii) installation of an upper/middle deep aquifer extraction well, and iv) the implementation schedule. Olin's response to the Water Board's comments is pending.

#### Llagas Subbasin Attenuation:

On April 15th Olin submitted an updated performance monitoring plan to the Water Board. Review is pending.

### **MRP 2001-161 –Well Sampling Activities**

Olin continues onsite and offsite monitoring pursuant to our understanding that the Water Board's intent was consolidation of MRP 2003-0168 and MRP 2001-161 (August 31, 2005 revision).

#### Well Sampling Activities:

On April 30 Olin submitted the *First Quarter 2008 Groundwater Monitoring Report* to the Water Board; review is pending. On May 29, Olin presented a summary of the quarterly report to PCAG.

During May 2008, water-level measurements were collected from onsite and offsite monitoring wells. Offsite groundwater samples were also obtained in preparation for the Second Quarter 2008 Groundwater Monitoring Report.

### **Groundwater Treatment System Operations**

Groundwater treatment system (GWTS) operations during May extracted and removed perchlorate from approximately 4.2 million gallons of groundwater. To date, over 237 million gallons of water have been treated. On May 29, the resin was replaced in the lead ion exchange vessel. Normal

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operations were resumed following the change out. GWTS operations data will be presented in the *Second Quarter 2008 Groundwater Monitoring Report*.

During May all injection wells were active, recharging 4.2 million gallons of water back into the Llagas Subbasin. Monitoring data collected for the recharge system will also be presented in the *Second Quarter 2008 Groundwater Monitoring Report*.

### Soil In Situ Bioremediation (ISB) System Operations

In October 2006, the Water Board concurred that the remedial objectives for the ISB had been achieved; however, soil remediation monitoring requirements remains part of the MRP.

### Upcoming Reports

### Due Date

- |  |                                |
|--|--------------------------------|
| • <u>Monthly Progress Reports</u>                                  | 10 <sup>th</sup> of each month |
| • <u>Groundwater Monitoring Reports:</u>                           |                                |
| Second Quarter 2008 Groundwater Monitoring Report                  | 7/30/08                        |
| Third Quarter 2008 Groundwater Monitoring Report                   | 10/30/08                       |
| • <u>Llagas Subbasin Characterization and Remediation Reports:</u> |                                |
| Area 1 45% Engineering Design Package                              | 8/8/08                         |
| Area 1 90% Engineering Design Package                              | 11/28/08                       |

Olin will continue providing monthly progress reports of our activities related to the CAO and MRP. If you have any questions, please call me.

Sincerely,  
OLIN CORPORATION



Richard W. McClure, P.G.  
Environmental Remediation Group

cc (via e-mail):

Jim Ashcraft, City of Morgan Hill  
James Cashwell, Olin  
Jim Deitsch, Geosyntec  
Sylvia Hamilton, PCAG Chair  
Diane Kukol, Water Board  
Betsy Lichti, CDPH  
Tom Mohr, Water District  
Dave Share, Olin  
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Thea Tyron, Water Board  
Gary Yamamoto, CDPH