



California Regional Water Quality Control Board

San Diego Region

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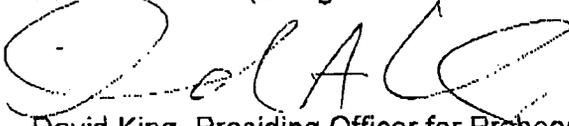


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TO: Distribution List (Designated Parties and Interested Persons)


FROM: David King, Presiding Officer for Prehearing Proceedings
Tentative Cleanup and Abatement Order No. R9-2005-0126
SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD

DATE: April 4, 2008

SUBJECT: NOTICE OF COMMENCEMENT OF PHASE III OF PROCEEDING;
TENTATIVE CLEANUP AND ABATEMENT ORDER NO. R9-2005-0126
(SAN DIEGO BAY SEDIMENT CLEANUP)

NOTE: This notice affects the rights and obligations of any person who has an interest in the San Diego Bay Sediments Cleanup proceeding. Please read it carefully and forward it to any other persons who have an interest in the proceeding. Additional information related to this proceeding is available at the following website:
<http://www.waterboards.ca.gov/sandiego/>.

This memorandum is to provide notice of the commencement of Phase III of the First Amended Order of Proceedings as published on January 30, 2006, pertaining to the pre-hearing conferences and related activities of the California Regional Water Quality Control Board, San Diego Region (Regional Board).¹ The Regional Board Advisory Team has reviewed the supporting documentation from the Regional Board files that constitute the Indexed Electronic Record for this matter for usability and completeness. The Regional Board Cleanup Team notified the Advisory Team that the Indexed Electronic Record, final Tentative Cleanup and Abatement Order No. R9-2005-0126 and the supporting Technical Report were distributed by the Regional Board Cleanup Team on **April 4, 2008**.² I have determined that the Phase II is complete and that all necessary conditions to commence Phase III have been met, and that Phase III is hereby commenced as of the date of this notice.

¹ A copy of the First Amended Order of Proceedings is attached to this notice for convenience. All requirements of the First Amended Order of Proceedings must be complied with.

² A copy of the Regional Board Cleanup Team's April 4, 2008 notification is on the Regional Board Cleanup Team's website.

Phase III Actions

Phase III provides an initial opportunity for Designated Parties and any other person (referred to as Interested Persons) to participate in the proceeding. Designated Parties, excluding the Cleanup Team, shall have until **July 3, 2008**, to conduct any necessary discovery and submit evidence and comments on the final Tentative CAO and draft Technical Report. Interested Persons that desire to comment on these documents must do so by **July 3, 2008**. Any Designated Party that would like to propose additional responsible parties for the cleanup must submit the proposal and a summary of the basis for the proposal, along with a statement that the proposal has been provided to the proposed responsible party no later than **May 5, 2008**.

Phase III also provides that the Designated Parties shall submit to the Advisory Team a joint nonbinding summary of the areas of disagreement regarding the Tentative CAO no later than **May 5, 2008**.

Information about General Requirements for the Submittal of Documents

Attached to this notice is a substitute index for Appendix B contained in the First Amended Order of Proceedings. Consistent with paragraph 2 of section 4 on page 6 of the First Amended Order of Proceedings, written comments submitted by Designated Parties shall be in an electronically digitized, text searchable Adobe PDF file format and shall be accompanied by the electronic index entry that follows the format in this substitute Appendix B. Appendix B will also be made available electronically on the Regional Board Advisory Team's website not later than April 4, 2008. Additional requirements applicable to comment submittal are set forth in the First Amended Order of Proceedings

Also consistent with the First Amended Order of Proceedings (page 6, section 4, paragraph 4), on March 25, 2008, the Cleanup Team provided the Advisory Team with a proposed specific format for written comments to be used by all Designated Parties throughout the proceeding. The Advisory Team has approved the attached specific format for written comments and it is entered as Appendix C to the First Amended Order of Proceedings. The attached specific format shall be used by all Designated Parties throughout the proceeding and will be made available electronically on the Regional Board Advisory Team's website not later than April 4, 2008.

Additional Matters

A Public Notice Mailing List for all Interested Persons has been created and will be maintained and updated as necessary by the Advisory Team. This List consists of all persons known or believed by the Regional Board to be interested in receiving notices

of hearings and meetings regarding this proceeding. Persons who would like to be included on this list should send their name and address to the Regional Board Advisory Team, care of Mike McCann, at 9174 Sky Park Court, Suite 100, San Diego, California, 92123 or to mmccan@waterboards.ca.gov. Those Interested Persons already on the Public Notice Mailing List or those requesting to be added to the List should include their email address and notify the Regional Board Advisory Team if they prefer to receive their notices by first class mail. Otherwise, all future notices will be provided by electronic mail.

As referenced in Paragraph 1 of the First Amended Order of Proceedings, the Regional Board's Executive Officer prepared a memorandum dated June 30, 2005, that describes the separation of Regional Board staff into an Advisory Team and a Cleanup Team for this proceeding. It should be noted that on January 24, 2008, the Executive Officer issued an updated Memorandum describing the separation of functions.

Finally, as indicated in the Regional Board Cleanup Team's April 4, 2008 notification, the portable hard drives containing the Indexed Electronic Record for this proceeding may be modified by the user. The Advisory Team will preserve one hard drive unmodified for reference in resolving any disputes that may arise about record inconsistencies.

Attachments:

1. First Amended Order of Proceedings, January 30, 2006
2. Substitute Appendix B, Electronic Index Entry
3. Appendix C, Comment Format

California Regional Water Quality Control Board
San Diego Region

FIRST AMENDED
ORDER OF PROCEEDINGS
PRE-HEARING CONFERENCE FOR TENTATIVE CLEANUP AND ABATEMENT
ORDER NO. R9-2005-0126.

Date: January 30, 2006

To: Distribution List (designated parties and interested persons)

The 1st Pre-Hearing Conference was held on Monday, September 26, 2005 at the office of the Regional Water Quality Control Board, San Diego Region (Regional Board). The 2nd Pre-Hearing Conference was held on December 6, 2005 at the Regional Board. Regional Board Chairman John Minan, serving as the Presiding Officer, conducted both hearings on behalf of the Regional Board. The Pre-Hearing Conferences were properly noticed and open to and attended by the public. An audio tape recording of both conference proceedings was made.

Additional pre-hearing conferences may be convened.

The primary goal of the Pre-Hearing Conferences is to ensure that the future hearing(s) for the Tentative Cleanup and Abatement Order No. R9-2005-0126 (CAO) proceed in an orderly manner. At the two Pre-Hearing Conferences, there has been no discussion of the merits of any provisions of the Tentative CAO.

This Amended Order of Proceedings reflects the nature of the discussions and agreements that have occurred at the Pre-Hearing Conferences and contains certain procedural decisions by the Presiding Officer. Rulings by the Presiding Officer contained in Paragraphs 1 and 2 and 4 through 14 of this Order are final, subject only to discretionary review by the Regional Board.

Attendees at the 1st Pre-Hearing Conference for the recommended and prospective designated parties included the following representatives:

Jim Dragna – Bingham McCutchen LLP (BP West Coast Products)
David Mulliken – Latham and Watkins LLP (NASSCO)
Kelly Richardson – Latham and Watkins LLP (NASSCO)
Vincent Gonzales – Sempra Energy (SDG&E)
Chris McNevin – Pillsbury, Winthrop, Shaw & Pittman LLP (Chevron USA)
Tim Miller – City of San Diego
Chris Zirkle – City of San Diego
Marco Gonzales – Environmental Health Coalition & San Diego Bay-Keeper

David Merk – Port of San Diego
Jim Mathison – Daley & Heft LLP (San Diego)
Shaun Halvax – BAE Systems
Lloyd Schwartz – BAE Systems
David Silverstein – U.S. Navy
Tom Fetter – San Diego Port Tenants Association
Craig Anderson – Industrial Environmental Association
John Richards – Regional Board Cleanup Team

Attendees at the 2nd Pre-Hearing Conference for the Designated Parties included the following representatives:

David Silverstein – U.S. Navy
Lloyd Schwartz – BAE Systems
Shaun Halvax – BAE Systems
David Mulliken – Latham and Watkins LLP (NASSCO)
Kelly Richardson – Latham and Watkins LLP (NASSCO)
Lance McVey—NASSCO
Mike Chee—NASSCO
Tom Mulder—TN Assoc. (SDG&E)
Barbara Montgomery—SDG&E
Chris Zircle—City of San Diego
Tim Miller—City of San Diego
Mark Elliot-- Pillsbury, Winthrop, Shaw & Pittman LLP (Chevron USA)
Marco Gonzalez—EHC
Laura Hunter—EHC
Paul Brown—Port of San Diego
Jim Mathison—Daley and Heft LLP (Port of San Diego)
John Richards—Regional Board Cleanup Team

The topics addressed in the Pre-Hearing Conferences and the respective discussions, agreements, and decisions are as follows:

1. Executive Officer's Participation on the Advisory Team.

The Presiding Officer considered motions objecting to participation by John Robertus, the Regional Board Executive Officer, as a member of the Advisory Team for the Regional Board. (See memorandum from John Robertus dated June 30, 2005 that describes the separation of staff into an Advisory Team and a Cleanup Team for this proceeding.)

The Presiding Officer placed Mr. Robertus under oath, permitted the parties to examine Mr. Robertus about his involvement in the development of the tentative CAO, his views regarding the need for cleanup of contaminated sediments, and related matters. Mr. Robertus testified that he would be able to provide advice to the Board in an open, unbiased manner based solely on the record and testimony

to be presented. No substantial evidence was presented to warrant disqualifying action.

As a result of Mr. Robertus' testimony and his response to questions, the Presiding Officer has determined that Mr. Robertus has not been personally involved in the investigation, prosecution, or advocacy roles of the staff to any extent that would preclude his involvement as a neutral advisor to the Regional Board. The Presiding Officer has further determined that Mr. Robertus has not developed any biases that would prevent him from providing neutral advice to the Regional Board in this matter.

The Presiding Officer, therefore, has determined that Mr. Robertus may continue to participate on the Advisory Team. The Presiding Officer has determined that Mr. Robertus shall provide all technical, scientific, and policy advice to the Regional Board in public meetings or in correspondence copied to all of the parties.

2. Designation of Parties.

The Pre-Hearing Conference provided an opportunity for persons seeking designated party status to address the Presiding Officer. The Presiding Officer hereby waives the strict applicability of Government Code Section 11440.50. (See Government Code Section 11440.50(a) and Title 23, California Code of Regulations, Section 648(d).) The Presiding Officer is applying Title 23, California Code of Regulations, Section 648.1.

The Presiding Officer determined that the Regional Board Cleanup Team is a Designated Party.

The Presiding Officer also considered requests from five persons requesting Designated Party status. Persons requesting Designated Party status submitted written requests and were provided the opportunity to address the Presiding Officer. All Designated Parties were provided the opportunity to comment on each request by persons seeking Designated Party status.

The Presiding Officer has determined that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the Bay-Keeper, the Environmental Health Coalition, and the San Diego Port Tenants Association to be Designated Parties. These entities are representative advocacy groups with a history of involvement in similar types of issues. The interests of their members that may be affected by this proceeding are, to some extent, different from the interests of the other Designated Parties. Therefore, the benefits to be derived from their participation outweighs the burdens. The San Diego Bay-Keeper, the Environmental Health Coalition, and the San Diego Port Tenants Association are hereby granted Designated Party status.

The Industrial Environmental Association and the Port of San Diego Ship Repair Association are denied Designated Party status. These entities' interests are adequately represented by having some of their members participate as Designated Parties. Moreover, their participation as Designated Parties may impede the orderly and prompt conduct of the hearing. To the extent that the San Diego Port Tenants Association desires to continue to collaborate with these entities, they may, of course, continue to do so. Otherwise, the participation of the Industrial Environmental Association and the Port of San Diego Ship Repair Association is limited to that of interested persons. They may present non-evidentiary policy statements, but may not present evidentiary testimony.

The Advisory Team's proposal to designate the San Diego Bay Council as a Designated Party is hereby rejected. The request for this designation was withdrawn by the Coast Law Group on behalf of the San Diego Bay Council in their correspondence of September 20, 2005.

3. The Proposed Order of Proceeding

The Presiding Officer proposes the following schedule and process. The schedule and process may be revisited by the Presiding Officer in a subsequent Pre-hearing Conference after the Technical Report information in Phase II is distributed by the Cleanup Team or whenever the Presiding Officer deems appropriate. Any Designated Party may request an extension of the schedule or a revision to the process. All such requests shall include specific reasons why the existing schedule and process are insufficient and a specific explanation about how the Designated Party intends to take advantage of the requested additional time or revised process. Any extensions or revisions shall be in the sole discretion of the Presiding Officer.

The following narrative describes the various phases of the schedule and process to be followed. For the convenience of the reader, Appendix A to this Order provides a chronological outline of the phases.

Phase I: The 1st Pre-Hearing Conference was conducted on Sept. 26, 2005. The 2nd Pre-Hearing Conference was conducted on December 6, 2005.

Phase II: The Cleanup Team shall distribute to all Designated Parties a Technical Report that supports the proposed issuance of the Tentative CAO. In addition, the Cleanup Team shall identify, index, and make available to all Designated Parties all directly relevant technical information related to the Tentative CAO and Technical Report. The Cleanup Team is directed to investigate the feasibility of converting the technical information into a digitized, electronic format to facilitate the Designated Parties' review, and report back to the Advisory Team on its proposed course of action.

Phase III: The Designated Parties, excluding the Cleanup Team, shall have 90 days after the release and distribution of the Technical Report to conduct any necessary discovery and submit evidence and comments on the Technical Report. All such evidence and comments shall be appropriately distributed to all Designated Parties. Interested Persons are required to submit comments within 90 days. Also upon the start of the same 90 days of Phase III, the Designated Parties shall have 30 days to submit to the Advisory Team a nonbinding summary of the areas of disagreement regarding the Tentative CAO.

Phase IV: The Designated Parties shall then have 30 days following the close of the initial 90-day comment period to conduct any discovery, including cross-examination of witnesses, and submission of evidence and comments for the purposes of rebutting evidence and comments submitted under Phase III above. Only rebuttal evidence and related comments will be accepted.

Phase V: The Cleanup Team shall have 60 days to consider all of the evidence and comments submitted under Phases III and IV above, and submit a Response to Comments and any proposed revisions to the Technical Report and/or Tentative CAO. The Cleanup Team should not submit any new evidence in Phase V. In addition, the Cleanup Team shall also provide a summary of all continuing areas of disagreement.

Phase VI: There will be a minimum 45-day public notice and comment period prior to the hearing before the Regional Board. The Designated Parties may submit hearing briefs and Interested Persons may submit written non-evidentiary comments at the conclusion of this period. No further written materials will be accepted from Designated Parties, excluding the Cleanup Team, or from Interested Persons, except as described in Phases VII and VIII, below. The Cleanup Team may submit a response, which may not contain any new evidence, to these hearing briefs and comments.

Phase VII: The Regional Board will then conduct a hearing with the primary purpose to receive comments from the public and summaries of the previously-submitted evidence and comments by the Designated Parties. Cross-examination may be available to the Designated Parties at the discretion of the Presiding Officer. No new evidence will be admitted at the hearing, subject to the Presiding Officer's discretion. Also, the Presiding Officer will not allow the introduction of new or additional evidence following the close of the hearing.

Phase VIII: The Regional Board will subsequently conduct a non-evidentiary meeting to consider whether to adopt, modify, or reject the Cleanup Team's final Tentative CAO. Brief public comments will be allowed on the proposed changes, if any, to the revised Tentative CAO. No new or additional evidence will be

admitted at this meeting. However, the Regional Board may direct questions to any of the Designated Parties.

4. General Requirements for the Submittal of Documents

The Advisory Team shall be responsible for receiving and maintaining all documents and electronic submissions submitted by Designated Parties and Interested Persons that comprise the administrative record for this proceeding, and shall, to the extent feasible, post them on the San Diego Regional Board website (<http://www.waterboards.ca.gov/sandiego/>).

In order to facilitate the development of the administrative record, all documents submitted by the Designated Parties shall be provided to the Advisory Team in an electronically digitized, text searchable Adobe PDF file format and shall be accompanied by an electronic index entry that follows the format established in Appendix B to this Order. In addition, an authorized representative for the Designated Parties shall submit a signed paper copy certification that the electronic submittal is a true and accurate copy of the submitted signed original.

The Designated Parties shall also provide 12 hard copies of all submissions to the Advisory Team and shall simultaneously distribute electronic versions of all submissions to the complete list of Designated Parties.

The Cleanup Team shall, within two weeks after release of the Technical Report, provide a specific format for written comments to be used by all Designated Parties throughout the proceeding. The format shall consist of a sequential structure that is organized by subject matter to facilitate the review of submitted comments and the development of responses to comments. The Advisory Team shall approve the comments format to be used by all Designated Parties and will enter the format as Appendix C to this Order.

5. Identity of Additional Responsible Parties

The deadline for the Designated Parties to identify any additional potential responsible parties will be **30** days from the distribution of the Cleanup Team's Technical Report, in order to provide an adequate opportunity for any additional potential responsible parties to participate in this proceeding.

6. Removal of Additional Responsible Parties

In order to conserve the resources of the Regional Board and the remaining Designated Parties, there will not be a separate summary process for Designated Parties to request to be removed from further consideration as a potential responsible party under the Tentative CAO proposed by the Cleanup Team.

7. Consideration of creating a comprehensive list of contested issues of fact and law.

The Presiding Officer directed the Designated Parties to establish a list of contested material issues of fact and law. This shall occur in accordance with the provisions of Paragraph 3, Phase III above. If the parties are unable to reach agreement, no party will be precluded from raising additional issues.

8. The length and date of the hearing(s).

The Presiding Officer determined that the Designated Parties, the Regional Board, and the public will have a reasonable amount of time to review and comment on the Tentative CAO, the Technical Report and the comments submitted by all parties. Because of the limited time to speak and present information at the hearing and the above limitation on the submission of new evidence at the hearing, the parties should be prepared to focus primarily on advanced written submissions of testimony and evidence. The parties should similarly expect that the opportunity for live cross-examination during the hearing will be limited, and should therefore take advantage of the discovery process to conduct reasonable cross-examination of witnesses.

9. Location of the hearing.

The hearing may be conducted at the Regional Board, or at a facility in the vicinity of the cleanup site if reasonable arrangements can be made for a suitable site.

10. Participation by non-English speaking persons.

All parties should be aware that non-English speaking persons may be in attendance at the hearing and allowance for translation should be considered.

11. Logistics for the workshops, tours, and other methods for providing background information to the Board Members and the public.

The Presiding Officer does not anticipate any Board Member tours of the proposed cleanup site because of the difficulties inherent in creating a clear record, preventing ex parte communications, and providing for complete public access.

12. Designated Parties Contacts, Organizations, E-mail Address, and Regular Mail Address.

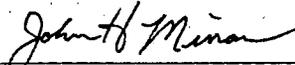
All designated parties shall submit in writing to the Advisory Team any revision to the contact information consisting of the organization representative, email address, and regular mail address.

13. Service to Regional Board Advisory Team:

Michael P. McCann, Supervising Engineer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, California 93123
Mmccann@waterboards.ca.gov

14. Pre-Hearing Conferences.

The Presiding Officer may schedule additional pre-hearing conferences as needed.



JOHN H. MINAN

Presiding Officer of the Pre-Hearing Conference and
Chairman, SDRWQCB

Attachments:

- Appendix A
- Appendix B
- Appendix C

Phase I Pre-Hearing Conference	Phase II Release of Tentative CAO & Technical Report	Phase III 90-Day Public Comment (formatted sequential structure based upon the tentative CAO & Technical Report) Discovery Submission of Evidence List of Unresolved Issues	Phase IV 30-Day Public Comment on the 90-Day Public Comments Additional Discovery Submission of Rebuttal Evidence	Phase V 60-Day Cleanup Team Response to "All Public Comments" No new evidence submitted. Revisions to CAO and/or Technical Report Final List of Unresolved Issues	Phase VI 45-Day Preparation & Noticing of CAO Hearing	Phase VII Hearing on CAO & Proposed Responsible Parties (Record closed at conclusion of hearing.)	Phase VIII Regional Board Meeting Deliberate & Vote on CAO
26 Sep 2005							
Cumulative Days	0	90	120	180	225	227	257

Appendix A
Outline of Schedule and Process
Jan. 30, 2006

APPENDIX B
January 30, 2006

Date of Document	Type of Document	Title/Description of Document	Submitted By	Submitted To	Total Number of Pages	Titles of Attachments

APPENDIX C

COMMENTS FORMAT

January 30, 2006

(To be provided by the Advisory Team following the release of the Technical Report)

Appendix B

First Amended Order of Proceedings

Index Values for Comments on Tent. CAO No. R9-2005-0126

Index Category	Entry
Assign To	FMELBOURN
Program	Site Cleanup Program (SCP)
Program Activity	Enforcement
Program Action	Cleanup and Abatement Order
Program Subaction	Public Comments and Responses
Document Date	MM/DD/YY
Date Received	Regional Board Staff will fill in
Subject	Comments on Tentative Cleanup and Abatement Order No. R9-2008-0126
Regulatory Measure	340860
From (Name Person)	Commenter to fill in
From Organization Type	Regional Board Staff will fill in
From - Organization Name	Commenter to fill in
To - Name (Person)	John Robertus, Executive Officer
To - Party Type	Regional Water Quality Control Board
To - Organization Name	RWQCB 9 - San Diego Region
File Code	N/A
File Volume	N/A
Related Document Handle	N/A
Place Number	712610
Place Name	Auto fill
Place Address	Auto fill
Place Number 2	Regional Board Staff will fill in
Confidential	No
Doc File Type	Regional Board Staff will fill in
Admin. Record Desc.	Shipyard Sediment Site CAO Proceedings

April 4, 2008

This version supercedes the original Appendix B attached to the First Amended Order of Proceedings dated January 30, 2006.

COMMENT FORMAT SHIPYARD SEDIMENT SITE

INSTRUCTIONS: Persons representing Designated Parties to the Cleanup and Abatement Order (CAO) Proceeding, excluding the San Diego Water Board Cleanup Team, shall submit all written testimony, argument, and exhibits¹ to the San Diego Water Board in the formats presented below.

The following list identifies participants, excluding the San Diego Water Board Cleanup Team, who have been identified by the San Diego Water Board as Designated Parties to the Cleanup and Abatement Order Proceeding²:

- BAE Systems San Diego Ship Repair, Inc. (formerly Southwest Marine Inc.)
- National Steel and Shipbuilding Company (NASSCO)
- San Diego Gas & Electric Company, a subsidiary of Sempra Energy Co.
- Chevron USA, a subsidiary of ChevronTexaco
- BP, the parent company and successor to Atlantic Richfield Co, (ARCO)
- U.S. Navy
- City of San Diego
- Marine Construction and Design Company / Campbell Industries, Inc.
- San Diego Coastkeeper (formerly known as San Diego Baykeeper)
- Environmental Health Coalition
- San Diego Port Tenants Association
- Port of San Diego

¹ Exhibits may include written testimony, technical documentation, factual information, expert opinions, statements of qualifications of expert witnesses, and other documents to be used as evidence.

² This current list of Designated Parties may be expanded during the course of the proceedings to include any other person whom the San Diego Water Board determines should be designated as a Party to the proceedings. Any person designated as a Party by the San Diego Water Board during the course of the proceedings is subject to the comment form guidelines described in this document.

Each submittal by persons representing Designated Parties to the proceeding shall provide the following information on the cover page of their submittal:

Name: _____

Title: _____

Company/Agency: _____

Street Address: _____

City, State, Zip Code: _____

Phone Number: _____

Email Address: _____

Party Representing: _____

Each comment³ shall be categorized by the type of document that is the subject of the comment (i.e., Tentative Cleanup and Abatement Order, Draft Technical Report for Tentative Cleanup and Abatement Order, Shipyard Administrative Record, or Written Testimony, Argument, and Exhibits Submitted by Other Participants). **Each comment shall be preceded by one of the information tables described below. A different information table shall be used for each individual comment. Consolidating comments that refer to the same document type is not acceptable. While one page can contain multiple comments, each comment must be preceded by its own separate information table. Comments which do not conform to this format may be stricken by the presiding Hearing Officer and excluded from the administrative record.**

Tentative Cleanup & Abatement Order Comment Information

Document Name	Tentative CAO No. R9-2005-0126
Document Date	
Finding or Directive Number	
Page, Paragraph, and Sentence Number	
Concise Summary of Issue	

Draft Technical Report for Tentative Cleanup & Abatement Order Comment Information

Document Name	Draft Technical Report for Tentative CAO No. R9-2005-0126
Document Date	
Section Number	
Page, Paragraph, and Sentence Number	
Concise Summary of Issue	

³ A "comment" is defined as any reasonably segregable issue, concern, or argument.

Shipyards Administrative Record⁴

Document Name	
Document Date	
Document Type	Shipyards Administrative Record
SAR Number ⁵	
Page, Paragraph, and Sentence Number	
Concise Summary of Issue	

Written Testimony, Argument, and Exhibits Submitted by other Participants⁶

Document Name	
Name of "Person" and Organization Document is From	
Document Date	
Document Type	Public Comment
Page, Paragraph, and Sentence Number	
Concise Summary of Issue	

⁴ The term "Shipyards Administrative Record" refers to the indexed administrative record in electronic format provided by the San Diego Water Board to the Parties to the Cleanup and Abatement Order Proceeding.

⁵ An individual Shipyards Administrative Record (SAR) Number is assigned to every page of every document in the electronic Shipyards Administrative Record.

⁶ Participants in the San Diego Water proceedings are either "designated parties" or "interested persons."