July 21, 2016

Marnie Ajello
Office of the Chief Counsel
CalEPA Headquarters
1001 I Street, 22nd Floor
Sacramento, CA 95814

SUBJECT: REBUTTAL MATERIALS IN THE MATTER OF PT. BUCKLER ISLAND CAO

Dear Ms. Ajello,

The rebuttal package submitted by the Prosecution Team contains:

1)A brief addressing legal arguments presented in the Dischargers' Opposition to Issuance of Cleanup and Abatement Order Brief (Opposition);

2) A Factual Rebuttal to address the large number of factually incomplete, incorrect, or misleading statements in the Opposition Brief;

3)The Prosecution Team's evidentiary objections; and

4)Rebuttal Exhibits.

Thank you in advance for your consideration of our submission.

Respectfully submitted,

Dyan C. Whyte

Dyan Whyte
Assistant Executive Officer
Prosecution Team Lead