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July 27, 2012

Via Electronic Mail
(pcreedon@waterboards.ca.gov)
and Facsimile

Pamela C. Creedon
Executive Director
California Regional Water Quality Control Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

**Re: Clark Structural, LLC and Clark Pacific Corporation former
Spreckels Sugar Company Facility, Yolo County**

Dear Ms. Creedon:

On behalf of Brenda Cedarblade and Ted Wilson I respectfully that the Regional Water Quality Control Board continue this matter until the Board's next meeting. This request is based upon several considerations. First, as counsel for designated parties Ms. Cedarblade and Mr. Wilson, I am unavailable as I have to be in New York on another mater: In Re: Methyl Tertiary Butyl Ether ("MTBE) Products Liability Litigation; *New Jersey Department of Environmental Protection, et al. v. Atlantic Richfield Co., et al.*, Southern District of New York, Case No. 08-CIV-00312 (SAS). While I have attempted to make other arrangements for my participation, to date those efforts have been unsuccessful. Additionally, Ms. Cedarblade and Mr. Wilson would like to accept the Regional Board's staff request to test the water wells on the Historic Nelson Ranch. The request was made directly to Ms. Cedarblade who has been out of town and not to her counsel in this matter. We believe the additional well data and groundwater sampling would be beneficial to the Regional Board in its consideration of this matter. This request does not prejudice Clark Pacific.

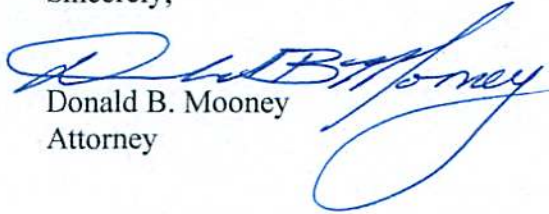
In the event the Regional Board does not grant the continuance, I provide the following comments regarding the Draft Cease and Desist Order. Ms. Cedarblade and Mr. Wilson are in general agreement with the proposed Cease and Desist Order and appreciate the Regional Board's efforts to address Clark Pacific's continuing non-compliance with Waste Discharge Order R5-2003-0047. As stated in the letters submitted to the Regional Board, Ms. Cedarblade and Mr. Wilson would like the schedule for removal of the PCC to be accelerated so as to remedy the situation and the impact to their property in a more timely manner. To the extent, that the PCC cannot be removed from the property in an expedited manner, then it should be relocated to another area of the property so as to minimize impacts to adjacent neighbors.

Ms. Pamela C. Creedon
July 27, 2012
Page 2

Finally, with respect to the submission of the *Revised Best Management Practices for the Removal of PCC*, Ms. Cedarblade and Mr. Wilson request that the submission of the report be subject to review by interested parties and subject to approval by Regional Board staff. Such best management practices should include sprinkling, creation of a crust, use of tarps, restrictions on removal of PCC on windy days, as well as air quality monitoring.

Thank you for your consideration of this request for a continuance.

Sincerely,



Donald B. Mooney
Attorney

cc: Brenda Cedarblade
Ted Wilson
Frederick Moss, Assistant Executive Officer
Wendy Wyels, Supervisor, Compliance and Enforcement Section
Todd Del Frate, Regional Board (tdelfrate@waterboards.ca.gov)
Greg Forest
Pam Neiberg
Alan Pryor