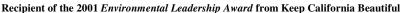


California Regional Water Quality Control Board

Los Angeles Region



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Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.waterboards.ca.gov/losangeles

Arnold Schwarzenegger

Governor

May 18, 2007

Mr. Sidhartha Paul AMCAL Multi-Housing, Inc. 30141 Agoura Road, Suite 100 Agoura Hills, C 91301

RESCISSION OF COVERAGE UNDER GENERAL WASTE DISCHARGE REQUIREMENTS – 424-446 WEST COMMERCIAL STREET, POMONA, CALIFORNIA (FILE NO. 05-172; CI-8988) (R4-2005-0030; SERIES NO. 031)

Dear Mr. Paul:

On November 18, 2005, the Executive Officer of the California Regional Water Quality Control Board, Los Angeles Region (Regional Board), issued General Waste Discharge Requirements (General WDRs) for Groundwater Remediation at Petroleum Hydrocarbon Fuel and/or Volatile Organic Compound Impacted Sites (Order No. R4-2005-0030, Series No. 031) and Monitoring and Reporting Program No. CI-8988 to you for the remediation of petroleum hydrocarbon contamination at the subject site. On April 25, 2007, you submitted a letter to the Regional Board requesting rescission of the General WDRs coverage for the site.

AMCAL Multi-Housing, Inc. (AMCAL) owns a vacant property at 424-446 West Commercial Street, Pomona, California. The property is approximately 50,357 square feet and AMCAL plans to redevelop it with a residential complex and a subterranean parking structure. Historically, the site was used for gasoline, diesel, and oil storage in underground storage tanks that were removed from the site in 1988. Environmental assessments conducted in 2003 and 2005 indicate that an area of approximately 748 square feet at the site is contaminated by petroleum hydrocarbons. Cleanup of the site has been overseen by the County of Los Angeles Fire Department Site Mitigation Unit (SMU). In 2005, AMCAL proposed to remediate the contamination at the site with an In-situ Chemical Oxidation (ISCO) method. Because the proposed remediation involves injecting liquids (hydrogen peroxide and citric acid) to subsurface and may cause contamination to groundwater, the SMU directed AMCAL to obtain approval from the Regional Board. By issuing the General WDRs, the Regional Board approved the proposed ISCO remediation at the site.

ISCO remediation was conducted at the site in December 2005 and March and April 2006. However, subsequent confirmation sampling results indicate that the remediation failed to reduce contaminates to target levels. In a Remedial Action Plan (RAP) dated January 22, 2007 submitted to the SMU, AMCAL proposed to complete remediation at the site by excavation and removal of contaminated soils from the site to a treatment facility. The proposed remediation by excavation will take place when the site is excavated for the planned redevelopment. In a letter dated February 22, 2007, the SMU approved the RAP.

California Environmental Protection Agency

In as much as no further ISCO remediation will be conducted, the site is no longer required to be regulated under the General WDRs. Coverage of the General WDRs for the site, as well as the associated Monitoring and Reporting Program (CI 8988), are hereby rescinded.

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If you have any additional questions, please contact Dr. Wen Yang at (213) 620-2253.

Sincerely,

Deborah J. Smith Interim Executive Officer

cc: Richard Clark, County of Los Angeles Fire Department Ami Adini, Ami Adini & Associates, Inc.