

LAW OFFICES OF DONALD B. MOONEY

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

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

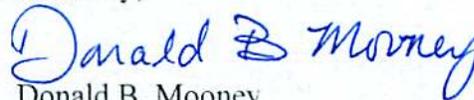
**Re: Rebuttal Comments on the Cease and Desist Order R5-2012-XXX for
Clark Structural, LLC and Clark Pacific Corporation former
Spreckels Sugar Company Facility, Yolo County**

Dear Ms. Creedon:

In response to the photographs submitted on August 28, 2012 by Clark Pacific, Ms. Brenda Cedarblade submits the attached photographs taken on September 2, 2012. In addition to the photographs, Ms. Cedarblade provides the attached statement regarding the photographs.

Based upon the comments and previous documentation submitted to the Regional Board, my clients again request that the lime be tarped; not re-stockpiled; and that water used for sprinklers be tested to ensure that Clark Pacific is not creating a bigger problem from the lime dust drifting into their home and barns.

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
Greg Forest