

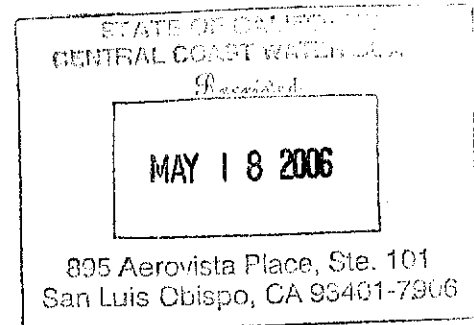
THE PRATT COMPANY

May 10, 2006

Mr. Roger Briggs
Executive Officer
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

RE: Scotts Valley Dry Cleaners

Dear Mr. Briggs:



I trust that you are in receipt of the April 2006 Groundwater Sampling Results for the above referenced site and the Work Plan, both prepared by SECOR on our behalf.

Both we and SECOR were very encouraged to see a second consecutive non-detect monthly result for PCE in MW-13B, the deep zone well closest to the Scotts Valley Water District's (SVWD) municipal well #10. Additionally, we are told that well #10 continues to obtain non-detect readings on its weekly well-head sampling for PCE.

Mr. Briggs, as we have stated in previous letters, The Pratt Company is a small family-run business. We have limited resources and, as such, the financial burden of having to fund the remediation efforts in Scotts Valley for the past 10+ years has been significant. In addition to complying with each of the Water Board's directives over this time, last year we installed the pump-and-treat system at the Dry Cleaners site at a cost of \$130,000. The cost-to-date for the remediation is approaching \$1,000,000 with significant remediation costs to come.

As you know, we are not directly responsible for the groundwater contamination in any way. We made an unfortunate business decision 10 years ago to enter into a moderate financial settlement with the Dry Cleaner operators for fear of pushing them into bankruptcy and collecting nothing.

We are aware that the SVWD and Water Board would like to see additional deep zone wells installed on and off-site in Scotts Valley. SECOR has priced the job and the estimated cost is \$60,000 per well. Given the fact that MW-13B has shown non-detect for PCE for the past two months, preceded by several months of declining PCE readings, and because of the advice of our engineers, SECOR, we strongly feel that this money is better spent elsewhere, namely, towards pilot studies and direct remediation on-site.

RRP Development Co. Inc.
Real Estate Development, Management, Leasing

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Item No. 15 Attachment No. 1
Sept. 7-8, 2006 Meeting
Scotts Valley Dry Cleaners

Monterey Office:
305 Bonifacio Place
Monterey, CA 93940
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We understand the SVWD's concern for their well #10, and we do not take their concerns lightly. However, the recent MW-13B readings and previous downward trends, the weekly well #10 sampling, and the existence of the SVWD's standby GAC system suggest that there is no imminent threat to the SVWD's supply at well #10. Again, we base our decision upon the professional advice of SECOR.

Directing us to install costly deep zone monitoring wells in the area will only serve to limit our ability to fund other, more effective remediation activities. We urge you to consider withdrawing your requirement that we install deep zone wells at this time. If SECOR continues to receive non-detect readings for PCE from samples from MW-13B, it would further demonstrate that the pump-and-treat system is effectively doing its intended job of establishing hydraulic containment of the plume on site. We can then introduce other, aggressive remediation measures in the hopes of cleaning up the site and (finally) gaining closure from your agency.

Thank you for your consideration.

Regards,



Russell Pratt

**THE
PRATT
COMPANY**