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02636.004

February 8, 2011

VIA FEDERAL EXPRESS and E-MAIL (jbashaw@waterboards.ca.gov)

State Water Resources Control Board Office of Chief Counsel Attn.: Jeannette L. Bashaw, Legal Analyst 1001 "I" Street, 22nd Floor Sacramento, CA 95814

Subject:

Petition for Review, for Substantive Issues to be Held in Abeyance, for Stay, and for Hearing, re: LARWQCB Amended Order to Canary Avenue, LLC re: Former Western Metal Lath, 15220 Canary Avenue, La Mirada, California (Site ID No. 204CE00, SCP No. 0673)

Dear Ms. Bashaw:

This letter brief is submitted on behalf of petitioner Canary Avenue, LLC ("Petitioner") in response to the Los Angeles Regional Water Quality Control Board ("RWQCB") California Water Code Section 13267 <u>Amended Order: Requirements to Submit Technical Reports to Investigate the Extent of Soil Matrix, Soil-Gas, and Groundwater Contamination – Former Western Metal Lath, 15220 Canary Avenue, La Mirada, California (Site ID No. 204CE00, SCP No. 0673) ("Amended Order").</u>

A prior petition was filed on October 20, 2010 with regard to the original Order dated September 21, 2010. All issues raised in that prior petition <u>are reserved</u>. This petition is filed to protect Petitioner, who was not named in the original Order, and to address the issues raised in the Amended Order in light of the fact that, since the issuance of the original Order, Petitioner voluntarily submitted a work plan to investigate the soil and soil gas at the subject site which the RWQCB has now approved.

1. Name, address, telephone number and e-mail address of the Petitioner:

Canary Avenue, LLC c/o John Van Vlear, Esq. Voss, Cook & Thel LLP

¹ Exhibit "A" to the Supplemental Declaration of John E. Van Vlear ("Supp. Van Vlear Decl.").

State Water Resources Control Board February 8, 2011 Page 2

> 895 Dove Street, Suite 450 Newport Beach, CA 92660 (949) 435-0225 vv@vctlaw.com

2. Action being petitioned:

Executive Officer's decision to issue the Amended Order to Petitioner and to require Petitioner to conduct response actions, including submittal of a work plan and technical reports.

3. The date the Regional Water Board acted, refused to act, or was requested to act:

The original Order was issued on September 21, 2010; on October 7, 2010 Petitioner's counsel requested that the original Order be rescinded; on October 20, 2010 a petition was filed to review the original Order. On November 12, 2010 Petitioner voluntarily submitted the Workplan for Additional Soils Investigation – Former Western Metal Lath, 15220 Canary Avenue – La Mirada, California ("Workplan"). The Amended Order was issued on January 19, 2011. The Workplan was approved on January 21, 2011.

4. Statement of the <u>main</u> reasons the action or inaction was inappropriate or improper:

Jurisdictional

Jurisdictional concerns raised in the original Order appear to have been resolved by the omission of Mr. Poliquin from the Amended Order. Petitioner is unsure if amending the original Order was the correct process to bring Petitioner into the matter. Although Petitioner does not appeal the Amended Order based on the process by which Petitioner was brought into the matter, Petitioner reserves the right to challenge that process at a later date, if necessary.

Substantive

- (a) Soil: All requirements regarding a work plan for soil and soil gas, and reporting the results of that testing, should be held in abeyance. On November 12, 2010, Petitioner voluntarily submitted the Workplan. On January 21, 2011 the RWQCB approved the Workplan, two days after the RWQCB issued the Amended Order. Because the RWQCB has already agreed to the soil and soil gas testing proposed in the Workplan, the requirements in the Amended Order related to soil and soil gas should be held in abeyance until that work is completed and it can be determined whether closure is appropriate for the soil at the Site.
- (b) <u>Groundwater</u>: Petitioner requests that all requirements in the Amended Order related to groundwater response actions (the first deadline, for monitoring well testing, is in July

State Water Resources Control Board February 8, 2011 Page 3

2011) also be held in abeyance. Petitioner believes that the results of the soil testing – as proposed three months ago but not approved until recently – will obviate some or all of the tests presently envisioned for Petitioner to perform for groundwater.

5. How the Petitioner is aggrieved:

Current and former owners and operators at the Site are being, or may be, asked to conduct environmental response actions for which the upgradient property, U.S. Gypsum, at 14370 Gannet Street, La Mirada, California ("USG Site") is responsible.

To minimize this harm, Petitioner respectfully requests that it be allowed to proceed with the soil and soil vapor testing that were proposed in November 2010 and approved just after the issuance of the Amended Order. Petitioner believes that this testing will show that the Site is not a source of actionable impact to the groundwater, thus mooting the need for Petitioner to conduct groundwater response actions as mandated by the Amended Order.

- 6. The actions the Petitioner requests the State Water Board to take:
 - Hold all issues in abeyance pending Petitioner's completion of the Workplan and coordination with the RWQCB.

If issues remain after coordination with the RWQCB, then:

- Rescind the Amended Order or instruct the RWOCB to rescind the Amended Order.
- If the Amended Order is not rescinded stay the Amended Order pending hearing on the substantive issues.

7. *Points and Authorities*:

Petitioner respectfully asks that the State Board hold in abeyance all substantive issues raised above while Petitioner works to perform the soil and soil gas testing described in the Workplan submitted three months ago. Petitioner met with the RWQCB after the original Order was issued, and thought an agreement had been reached to allow Petitioner to voluntarily proceed with the work described in the Workplan while placing a "hold" on the original Order. However, the RWQCB still issued the Amended Order, necessitating this petition. Petitioner believes that the results of the soil and soil gas testing described in the now-approved Workplan will show that the Site is not a source of actionable impact to groundwater, will resolve the soil and soil gas issues contained in the Amended Order, and will moot the need for the groundwater response actions by Petitioner as required by the Amended Order.

Thus, there is very little downside to placing the issues in abeyance. Petitioner benefits by not having to engage in groundwater response actions that may prove unnecessary. Given the number of years that have lapsed in dealing with the contamination at issue in the Amended

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Order, it would appear that the small incremental delay in groundwater response actions is outweighed by the benefit of potentially shifting the cost burden of such testing away from an innocent party.

8. Petitioner has sent copies of this petition to the Regional Water Board and to Western Metal Lath.

Yes, Petitioner has. Also, even though Petitioner is challenging the Amended Order, it has voluntarily submitted the Chemical Storage and Use Questionnaire to the RWQCB, and is voluntarily uploading documents to GeoTracker, as further evidence of Petitioner's good faith efforts to work with the RWQCB.

9. Petitioner raised the issues in this petition to the RWQCB before the RWQCB acted.

Petitioner has raised the issues in this petition for years with the RWQCB, including before the RWQCB issued the original Order and Amended Order.

Stay Necessity.

If coordination with the RWQCB after the Workplan is complete does not resolve the issues, at least a stay of the Amended Order will be needed to avoid substantial harm to Petitioner since it will otherwise be forced to respond under threat of law to the Amended Order for which there is no supportable substantive basis. Furthermore, issuing a stay will not cause substantial harm to other interested parties, and there are substantial questions of fact or law regarding the Amended Order.²

Thank you for your consideration and action upon these important issues. If there are any questions, please contact John Van Vlear directly at 949/435-4338.

Very truly yours,

John Van Vlear, Esq., R.E.A.

cc: Phil Wyels, Esq. (SWRCB)

Arthur Heath (LARWQCB)

Christopher McNevin, Esq./Andrew W. Homer, Esq. (for Western Metal Lath)

² Supp. Van Vlear Decl., ¶ 2

SUPPLEMENTAL DECLARATION OF JOHN E. VAN VLEAR IN SUPPORT OF PETITION

I, John E. Van Vlear, declare:

I am an attorney at law duly admitted to practice before all the courts of the State of California and the attorney of record herein for Petitioner Canary Avenue, LLC. The following facts are known to me and I could so testify if called upon.

- 1. Attached hereto as Exhibit A is a true and correct copy of California Water Code Section 13267 Amended Order: Requirements to Submit Technical Reports to Investigate the Extent of Soil Matrix, Soil-Gas, and Groundwater Contamination Former Western Metal Lath, 15220 Canary Avenue, La Mirada, California (Site ID No. 204CE00, SCP No. 0673), issued by the RWQCB on January 19, 2011.
- 2. If coordination with the RWQCB after the Workplan is complete and does not resolve the issues, at least a stay of the Amended Order will be needed to avoid substantial harm to Petitioner since it will otherwise be forced to respond under threat of law to the Amended Order for which there is no supportable substantive basis. Furthermore, issuing a stay will not cause substantial harm to other interested parties, and there are substantial questions of fact or law regarding the Amended Order.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: February 8, 2011

John E. Van Vlear



California Regional Water Quality Control Board



Linda S. Adams Acting Secretary for Environmental Protection

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 Edmund G. Brown Jr. Governor

January 19, 2011

Mr. Raymond E. Poliquin Canary Avenue, LLC 263 North Covina Lane City of Industry, CA 91746 Certified Mail Return Receipt Requested Claim No. 7009 0820 0001 6811 9756

AMENDED CALIFORNIA WATER CODE SECTION 13267 ORDER: REQUIREMENTS TO SUBMIT TECHNICAL REPORTS TO INVESTIGATE THE EXTENT OF SOIL MATRIX, SOIL-GAS, AND GROUNDWATER CONTAMINATION -FORMER WESTERN METAL LATH, 15220 CANARY AVENUE, LA MIRADA, CA (SITE ID NO. 204CE00, SCP NO. 0673)

Dear Mr. Poliquin:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting groundwater and surface water quality in Los Angeles and Ventura Counties. To accomplish this, the Regional Board issues investigative orders authorized by the Porter Cologne Water Quality Control Act (California Water Code [CWC], Division 7). On September 21, 2010, the Regional Board issued you a CWC section 13267 Order requiring the submittal of technical reports to investigate subsurface soil matrix, soil-gas, and groundwater.

In a meeting attended by you, Mr. John Van Vlear of Voss, Cook, & Thel, LLP, Mr. Andrew Homer of Pillsbury, Winthrop, Shaw, Pittman, LLP, Mr. Kevin Green of SCS Engineers, and Regional Board staff on October 7, 2010, Mr. Van Vlear indicated that you are not the individual owner of the subject property. Canary Avenue, LLC is the record owner of the referenced property. Regional Board staff has consulted with the State Water Resources Control Board Office of Chief Counsel regarding this matter and determined that the Order should be amended. Therefore, I have enclosed the amended Regional Board investigative Order (Amended Order) requiring submittal of technical reports pursuant to CWC section 13267. The Amended Order requires submittal of technical reports for the lateral and vertical delineation of impacted soil, soil-gas, and groundwater on and offsite (if necessary) from releases at the former Western Metal Lath facility. The due dates and requirements in the Amended Order supersede those specified in the Order issued to you on September 21, 2010.

If you have any questions regarding the Amended Order, please feel free to contact the project manager, Mr. David Young at (213) 576-6733 or via email at dyoung@waterboards.ca.gov.

Sincerely,

Executive Officer

Enclosures:

1. Amended Regional Board 13267 Order dated January 19, 2011

2. Chemical Storage and Use Questionnaire



California Regional Water Quality Control Board



Los Angeles Region

Linda S. Adams
Acting Secretary for
Environmental Protection

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

Edmund G. Brown Jr.

REQUIREMENTS TO SUBMIT TECHNICAL REPORTS (CALIFORNIA WATER CODE SECTION 13267)

DIRECTED TO CANARY AVENUE, LLC

FORMER WESTERN METAL LATH FACILITY 15220 CANARY AVENUE, LA MIRADA, CALIFORNIA (SITE ID NO. 204CE00, SCP NO. 0673)

You are legally obligated to respond to this Order. Please read this carefully.

Pursuant to section 13267 of the California Water Code (CWC), you are hereby directed to define the extent of soil, soil gas, and groundwater contamination encountered at the subject site (Site) and submit the following:

- 1. By April 22, 2011, a work plan for additional soil, soil gas, and groundwater investigation in the vicinity of the former underground storage tanks (USTs) shall be submitted to the Los Angeles Regional Water Quality Control Board (Regional Board) to determine the lateral and vertical extent of the subsurface contamination originating from releases at the Site. A report or reports documenting the results of, or additional work plans to complete the required soil, soil gas, and groundwater investigations shall be submitted by the due date(s) specified in future amendments to this Order and in the work plan approval or report review comment letter(s) from the Regional Board.
- 2. By July 31, 2011, you are required to submit the first semi-annual groundwater monitoring report for the first half of 2011 (January through June) to the Regional Board. Groundwater monitoring of existing and potential new groundwater wells at the Site must resume and be conducted according to the following schedule:

Monitoring Period
January – June
July – December

Report Due Date
July 31st
January 31st

In addition to the information provided in the previous monitoring reports, all future groundwater monitoring reports shall include the following:

- Plan-view and cross-section maps/figures showing the extent of dissolved-phase contamination in the saturated zone, including isoconcentration maps for all primary contaminants detected at the Site.
- 3. By February 18, 2011, you are required to complete and return the attached chemical use questionnaire to provide information on past and/or present chemical storage and usage at the Site. The return of this questionnaire, properly signed, is required for all chemicals that are/were stored or used at the Site.

Canary Avenue, LLC Former Western Metal Lath Facility SCP No. 0673

4. Effective immediately, in addition to hard copies, all future reports and data must be uploaded via e-submittal to GeoTracker by the report due date specified by the Regional Board. Due to technical constraints, you are also required to submit hard copies of all Site documents, data, and correspondence to the Regional Board by the specified due date(s). Currently, all of the information on electronic submittal regulations and GeoTracker contacts can be found at:

http://www.waterboards.ca.gov/water issues/programs/ust/electronic submittal/.

For your convenience, the Geotracker global ID for this Site is SL204CE2369.

Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical reports/documents described above, or failure to comply with regulations requiring the electronic submittal of information, which went into effect on January 1, 2005, may result in the imposition of civil liability penalties by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day each report is not received or compliance with the required electronic submittal of information is not met, after the *above* specified due dates.

The Regional Board needs the required information in order to determine the lateral and vertical impact to soil, soil gas, and groundwater from releases of chlorinated volatile organic compounds (VOCs) at the Site. You are being required to submit the required documents based on the following justifications:

- A. The Regional Board issued a California Water Code (CWC) section 13304 Order to you dated September 26, 2005, requiring the submittal of a remedial action plan to addressed soil and groundwater impacted from releases of VOCs at the Site. This order was subsequently rescinded based on the following criteria:
 - a. To allow Regional Board staff additional time to accurately identify the appropriate responsible parties for the subject site;
 - b. To reconsider your consultant's request to re-evaluate and possibly take action on the "missing link" investigation data results; and,
 - c. To allow the Regional Board and other parties to work out any differences that may be prohibiting the responsible parties from moving forward towards remediating the subject site.

In response to item A.a. above, Regional Board staff requested completion of a certification declaration for compliance with fee holder notification requirements in a letter dated August 4, 2009. The completed form, which we received back to our office on September 10, 2009, indicates that Canary Avenue, LLC holds the title to the Site. Therefore, you have been identified as a responsible party for the investigation and cleanup of VOCs in soil, soil gas, and groundwater caused by releases at the Site.

Canary Avenue, LLC Former Western Metal Lath Facility SCP No. 0673

In response to item A.b. above, Regional Board staff received and reviewed the document Further Site Investigation Report Former Western Metal Lath Facility, dated November 30, 2005, prepared by SCS Engineers. This document details the results of the "missing link" investigation mentioned above. The information provided in this report was used to supplement previous investigation findings. After reviewing the data included in the referenced report and other file documents, Regional Board staff have concluded that releases at the Site in the area of the former USTs have impacted subsurface soil and groundwater.

In response to item Ac above, Regional Board staff have been working with the adjacent property owner to continue investigation and cleanup of contamination caused by releases at their property. This contamination appears to be comingling with releases that occurred at the [Western Metal Lath] Site.

- B. 1,1,1-trichloroethane (1,1,1-TCA) was used and stored at the Site. Soil data in the area of the Site's former 1,1,1-TCA/solvent UST confirms that 1,1,1-TCA, has impacted soil beneath this tank at concentrations up to 2.2 milligrams per kilogram (mg/kg). The required additional soil sampling will be used to confirm previous soil investigation results and delineate the lateral and vertical extent of contamination in soil.
- C. Soil gas sampling has been conducted at two locations at the Site. These locations were along the northern and western property boundaries, more than 250 feet from the identified source area(s). Due to the nature of the VOCs detected in soil matrix and groundwater samples at the Site, soil gas data collected in the vicinity of the identified source area(s) will allow Regional Board staff to evaluate if VOCs in the vapor phase will act as a secondary source for groundwater contamination.
- D. Based on sampling data from groundwater monitoring wells GMW-1, GMW-2, and GMW-3, groundwater has been impacted with elevated concentrations of VOCs in the area of the Site's former 1,1,1-TCA/solvent UST. Specifically, concentrations of 1,1-dichloroethene (1,1-DCE) up to 6,710 micrograms per liter (μg/L) have been detected in on-Site groundwater monitoring well GMW-3, which falls directly downgradient of the former 1,1,1-TCA/solvent UST located at the Site. Considering that 1,1,1-TCA can readily degrade to 1,1-DCE, the high levels of this contaminant detected in the referenced groundwater monitoring wells likely resulted from leakage of the former 1,1,1-TCA/solvent UST.
- E. Groundwater analytical data over a period of approximately 16 years from upgradient monitoring wells GTI-3 and GTI-4 do not show high levels of contamination migrating onto the Site that would be consistent with the high concentrations of 1,1-DCE observed in the on-Site groundwater monitoring well GMW-3.
- F. Your consultant has indicated in previous correspondence that soil contamination detected in the area of the former on-Site 1,1,1-TCA/solvent UST at depths greater than 40 feet below ground surface (bgs), resulted from the lateral migration of VOCs through several hundred feet of clays and silts from the US Gypsum facility (upgradient site). However, there is no data to support this

Canary Avenue, LLC Former Western Metal Lath Facility SCP No. 0673

hypothesis, including the results of the "missing link" investigation (referenced above). As indicated by Regional Board staff during previous correspondence with the Site, a more likely scenario to explain the concentrations of VOCs in soil directly beneath the Site's former 1,1,1-TCA/solvent UST, is that this UST is the source of the contamination.

We believe that the burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. If you disagree and have information about the burdens, including costs, of complying with these requirements, provide such information to Mr. David Young within ten days of the date of this letter so that we may reconsider the requirements.

All future technical reports required pursuant to the CWC section 13267 Orders shall contain the following completed perjury statement (below). The perjury statement shall be signed by you or someone acting on your behalf as a senior authorized representative (and not by a consultant). It shall be in the following format:

"I [Name], do hereby declare, under penalty of perjury under the laws of the State of California, that I am [Job Title] for [Name of Responsible Party/Discharger], that I am authorized to attest to the veracity of the information contained in the reports described herein, and that the information contained in [Name and Date of Report] is true and correct, and that this declaration was executed at [Place], [State], on [Date]."

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

SO ORDERED.

Samuel Unger, PE

Executive Officer

January 19, 2011



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013
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Edmund G. Brown Jr.

Governor

CHEMICAL STORAGE AND USE QUESTIONNAIRE VOLATILE ORGANIC COMPOUNDS (VOC) INVESTIGATION

ſ.	Facility information	
1.	Company name:	
2.	Company address:	Unit No
3.	City:Zip code:	Phone: ()
4.	Standard Industrial Classification (SIC):	
5.	Brief description of business:	
б.	EPA Generator Number:	Years in business at this location:
7.	Answer the following questions relative to P	RESENT operations:
	A. Do you use any of the following: solvent	s, coatings, liquid polymers, extractive agents,
٠.	paint and/or varnish removers, cleaning a	nd degreasing agents, or agricultural soil
	fumigant compounds?	Yes No
	If yes, please explain:	
	Please submit any MSDS or product rela	ted information regarding the above referenced
	compounds.	
	B. Do you have storage tanks?	YesNo
	C. Do you have degreasers?	YesNo
	D. Do you perform metal work?	YesNo
	E. Do you have a clarifier, sump, tank or other	ner holding
	tanks for waste water/waste chemicals/w	aste oil? Yes No
	F. Do you have an industrial waste permit f	or sewer discharge? Yes No
	G. Do you store chemicals at this location?	YesNo
	California Environme	ntal Protection Agency

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Η	I. Have any soil, waste wa				_				
	investigations been conc			Yes	No				
	If so, under what state or	local							
	agency?		··						
Α	nswer the following questi	ons relative to PAST	perations:	•					
A	. Have you used any of th	e following: solvents,	coatings, liquid po	lymers,	extractive				
	agents, paint and/or varr	ish removers, cleaning	and degreasing ag	ents, or	agricultural s				
	fumigant compounds?			Yes	No				
	If yes, please explain:			٠	•				
									
	Please submit any MSD	S or product related inf	ormation regarding	g the abo	ove reference				
	compounds.								
В	3. Did you once have stora	ge tanks?	•	Yes	No				
C	C. Did you once have degre	easers?	· · · · · <u> </u>	Yes	No				
D). Did you perform metal v	work?		Yes	No .				
Ε	2. Did you have a clarifier,	sump, tank or other	•						
	holding tanks for waste	water/waste_chemicals/	waste oil?	Yes	No				
F	. Did you have an industr	ial waste permit for sev	ver discharge?	_ Yes	No				
C	3. Did you have a drum sto	orage area?		Yes	No				
H	H. Have any soil, waste wa	ter and/or groundwater							
	investigations been con-	ducted on the property?	·	Yes	No				
N	Name(s) of former tenants(s	s), dates of operation ar	nd type(s) of busine	ess(es) (1	use the back				
t]	this page for additional tenants or provide a separate sheet if necessary).								
	Company Name	Type of Business	Dates of Op						

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	Property owner information		•	
Nan	ne of current property owner:			
	ling address of property owner:			
City	z:Zip code	:Phon	e: ()	
Pric	or property owner(s) and the dates of	f their ownership		
•	Property Owner	Dates of O	wnership	
		From	То	
				
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I.	Waste Management			
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V. Chemical Storage and Use

Complete the following sections for all chemicals in current use or that have been used in the past. Add additional sheets if needed to complete your listing.

1.	Chemical name:	
2.	Common/Trade name:	Quantity stored:
3.	Storage method: Underground tank	Drums
	Above ground tank	Other (specify)
4.	Waste disposal: Sewered	Onsite recycling
	Hauled	Offsite recycling
5.	Is the waste treated prior to disposal?	YesNo
	If yes, specify treatment method:	
6.	Is the waste stored prior to disposal?	YesNo
7.	Is manifest documentation for designated waste	
	streams available?	Yes No
1.	Chemical name:	
2.	Common/Trade name:	Quantity stored:
3.	Storage method: Underground tank	Drums
	Above ground tank	Other (specify)
4.	Waste disposal: Sewered	Onsite recycling
	Hauled	Offsite recycling
5.	Is the waste treated prior to disposal?	Yes No
	If yes, specify treatment method:	
6.	Is the waste stored prior to disposal?	Yes No
7.	Is manifest documentation for designated waste	
	streams available?	YesNo

SCP No. 0673 Page 5

Chemical Storage and Use Questionnaire Volatile Organic Compound (VOC) Investigation

This questionnaire shall be signed below by a principal executive officer at the level of vice-president or his duly authorized representative if such representative is responsible for the overall operation of the facility in the case of corporations; by a general partner in the case of a partnership; by the proprietor in the case of a sole proprietorship; or by either a principal executive officer, ranking elected official, or other duly authorized employee in the case of a municipal, State, or other public facility.

This questionnaire has been completed under penalty of perjury and, to the best of my knowledge, is true and correct.

Signature:		·				Date:				•	
Printed name:	•		•	•			Title:	· · ·		···	
Phone number: ()_		:						·. ·.	. `	
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Contact name:	٠,	•			'			Title:		••	
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