

THE PRATT COMPANY

May 18, 2006

Mr. Roger W, Briggs
Executive Officer
CRWQCB
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

RE: Scotts Valley Dry Cleaners

Dear Mr. Briggs:

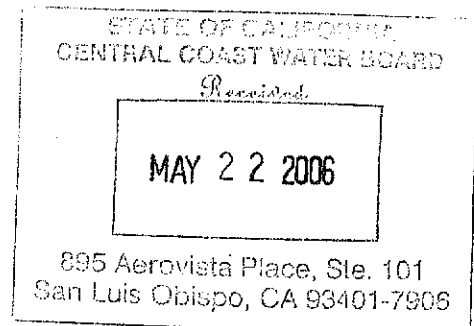
I believe that you are in receipt of SECOR's April 2006 Groundwater Sampling Results for the above referenced site, as well as the Work Plan for Continued Off-site Assessment and Conceptual Work Plan for On-site Remediation Pilot Study, both dated May 8, 2006.

We 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 the cost of \$130,000. The cost-to-date for the remediation effort of the Dry Cleaners site 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 modest financial settlement with the Dry Cleaner operators for fear of forcing them into bankruptcy by proceeding with our lawsuit, and ultimately collecting nothing.

We are aware that the SVWD and Water Board would like to see additional deep zone wells installed on-site 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, 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. 2
Sept. 7-8, 2006 Meeting
Scotts Valley Dry Cleaners

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 non-detect well #10 sampling, and the existence of the SVWD's standby GAC system appear to tell us that there is no imminent threat to the SVWD's supply at well #10.

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 with the goal of rapidly cleaning up the site and gaining closure from your agency.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Russell R. Pratt', written over a horizontal line.

for Russell R. Pratt

**THE
PRATT
COMPANY**