

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

CLEANUP AND ABATEMENT ORDER NO. R5-2006-0717
FOR
LEONARD D. ROBINSON, RIVER CITY PETROLEUM INCORPORATED,
AND DOUGLAS OIL COMPANY,
510 WASHINGTON BLVD, ROSEVILLE, PLACER COUNTY

This Order is issued to Leonard D. Robinson, River City Petroleum Inc, and Douglas Oil Company, a California company, hereafter collectively referred to as Dischargers, based on provisions of California Water Code section 13304, which authorizes the California Regional Water Quality Control Board, Central Valley Region (hereafter Water Board) to issue a Cleanup and Abatement Order (Order), and Water Code section 13267, which authorizes the Water Board to require preparation and submittal of technical and monitoring reports.

The Executive Officer finds, with respect to the Dischargers' acts or failure to act, the following:

1. The Dischargers owned and/or operated a gasoline station at 510 Washington Blvd, Roseville, Placer County, Placer County assessor parcel number 011-103-013-000. Douglas Oil Company, became the sole record owner of fee title for the site on 18 May 1982, and Leonard D. Robinson, the CEO of River City Petroleum Inc, became the sole record owner of fee title for the site on 28 August 1985. Although site operators have changed since Leonard D. Robinson purchased the property in August 1985, Leonard D. Robinson has maintained ownership of the site, and therefore operational control of the site, since 28 August 1985. Leonard D. Robinson and Douglas Oil Company are subject to this Order because they owned this property at a time when the underground storage tank (UST) system caused or permitted waste to be discharged to waters of the state where it has created a condition of pollution or nuisance.
2. The site was operated by River City Petroleum Inc. from the time of Leonard D. Robinson's purchase of the property on 28 August 1985 until 5 April 1995 when, according to City of Roseville Fire Department records, site operations were assumed by Rashpal Hira. Santokh Hira became the operator of the site by 24 January 2002, and by 17 December 2003 the site was jointly operated by Santokh and Karnail Hira. River City Petroleum Inc. and Douglas oil Company are subject to this order because they operated the UST system when it caused or permitted waste to be discharged to water of the State where it has created a condition of pollution or nuisance. As of this order, Santokh Hira and Karnail Hira continue to operate the site, but have not been named as responsible parties because no known discharges of waste have occurred during their operation of the facility.
3. The site's original underground storage tanks (UST's), consisting of a single 7,500-gallon leaded gasoline tank and two 10,000-gallon unleaded gasoline tanks, were installed in approximately 1962.
4. In March 1985 three groundwater monitoring wells were installed at the site. Groundwater was encountered at approximately 24 feet below ground surface and the IT Corporation reported petroleum hydrocarbon impacted soil in MW-1 and MW-3 based on lower explosive limit (LEL) readings between 3 and 15 percent. No standard analytical data was submitted.

5. In June 1985 two soil borings were advanced beneath the site and the results of the soil samples collected from the borings indicated that an unauthorized release of petroleum hydrocarbon had occurred and that soil beneath the site had been impacted.
6. In February 1991, groundwater samples were collected from monitoring wells MW-1, MW-2 and MW-3. These were the first documented groundwater samples collected from beneath the site, and the analytical result indicated that concentrations of total petroleum hydrocarbons as gasoline (TPH-G), benzene, toluene, ethylbenzene, total xylenes, as high as 670,000 µg/L, 9,100 µg/L, 18,000 µg/L, 3,600 µg/L, and 61,000 µg/L respectively, were present in groundwater beneath the site.
7. The first unauthorized release form on file for the site was to Regional Water Board Staff on 13 September 1991. The form, filed by River City Petroleum Inc, was not complete and is not dated; however, it states that River City Petroleum Inc. is the responsible party for the identified release.
8. In December 1991 the site's three original USTs were removed from the site and replaced with three 10,000-gallon double-walled fiberglass tanks. Soil samples collect from beneath the tanks, piping runs, and dispenser islands confirmed that an unauthorized release of petroleum hydrocarbons had occurred at the site.
9. In an effort to assess the nature and extent of the documented unauthorized release of petroleum hydrocarbons, as well as facilitate remedial activities, numerous soil borings, monitoring wells, and remedial wells have been installed since 1985. As of March 2006 the site's monitoring/remedial well network consisted of 23-monitoring wells and six extraction wells located both on and off the subject site.
10. In an effort to address the unauthorized release that occurred at the site, multiple remedial efforts, consisting of over-excavation, soil vapor extraction (SVE), and dual phase extraction (DPE), have been performed.
 - In January 1992, shallow impacted soil was over-excavated from beneath the former dispenser islands.
 - From August 1999 to February 2000 a soil vapor extraction system operated, removing approximately 84-pounds of petroleum hydrocarbons.
 - Between 16 January 2003 and 18 March 2003 two separate DPE events were conducted. A 15-day event, during which approximately 578-pounds of hydrocarbons were removed, and a 37-day event, during which approximately 3,431-pounds of hydrocarbons were removed.
 - Between June and August 2004 a 46-day DPE event was conducted removing approximately 11,500-pounds of petroleum hydrocarbons.
 - By 19 July 2006, a remedial system had been installed, but has yet to operate.

11. Although multiple efforts to reduce source area concentrations have been performed, elevated concentrations of petroleum hydrocarbon constituents persist in groundwater beneath the site at levels that exceed the numerical limits selected to implement the Water Quality Objective's listed in the Basin Plan (see Finding 28 in this Order).
12. Due to the total mass removed during the 2004 DPE event, and the influent vapor concentrations detected at the end of the event, the Discharger's consultant, Black Point Environmental, proposed to conduct another 30-Day DPE event. Although Regional Water Board staff (staff) concurred that additional remedial work would be required, staff requested that a more permanent remedial system, capable of operating for a much longer duration, be installed as a more cost effective alternative. Subsequently, staff requested that the Dischargers submit a Final Remediation Plan (FRP).
13. In a 3 August 2005 letter, staff approved the 20 July 2005 *Final Remedial Action Plan (RAP)*, submitted by Black Point Environmental on behalf of the Dischargers. The *RAP* proposed to install and operate a high vacuum DPE (HVDPE) system in an effort to reduce hydrocarbon concentrations beneath the site.
14. Staff has made multiple requests for a technical report documenting the installation, startup, and continued operation of the remedial system proposed in the FRP. These requests were articulated in the 3 August 2005 and 15 December 2005 staff letters, and in telephone conversations with the Discharger's consultant, Black Point Environmental, on 3 March 2006 and 17 May 2006. The remediation system was not installed and the requested technical report was never received.
15. The site is surrounded by occupied residential properties, the closest of which borders the eastern boundary of the site. Elevated influent vapor concentrations, recorded during the last DPE event, indicate that the potential exists for exposure to hydrocarbon fuel vapors, and therefore, they must be investigated, and if present, abated by the Dischargers.
16. Five supply wells are located within 2,000 feet of the site; two irrigation wells associated with the Sierra View County Club and three municipal wells; Roseville Municipal wells No.1, No.2, and No.3. Although, Roseville Well No.2 is no longer operational, it along with wells No.1 and No.3 can and would be used in the event of a water emergency. Additionally, replacement wells are planned for the City of Roseville.
17. River City Petroleum Inc. was issued a Letter of Commitment by the Underground Storage Tank Cleanup Fund in 1995 and as of 28 June 2006, \$724,000 remains to conduct the necessary site work.
18. Free product was present in groundwater as recently as July 2003, and the maximum hydrocarbon concentrations detected in groundwater beneath the site during the most recent sampling event, March 2006, are outlined in Table 1.

Table 1

TPH-G	Benzene	Toluene	Ethyl- benzene	Total Xylenes	MTBE	TBA	TAME	1,2-DCA
52,000	56	70	910	6,200	430	91	1.6	1.7

Concentrations in µg/L

AUTHORITY – LEGAL REQUIREMENTS

19. Section 13304(a) of the California Water Code provides that:

“Any person who has discharged or discharges waste into waters of the state in violation of any waste discharge requirements or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including but not limited to, overseeing cleanup and abatement efforts. A cleanup and abatement order issued by the state board or a regional board may require the provision of, or payment for, uninterrupted replacement water service, which may include wellhead treatment, to each affected public water supplies or private well owner. Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the regional board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.”

20. Section 13304(f) of the California Water Code provides that:

“Replacement water provided pursuant to subdivision (a) shall meet all applicable federal, state and local drinking water standards and shall have comparable quality to that pumped by the public water system or private well owner prior to the discharge of waste”

21. Section 13267(b)(1) of the California Water Code provides that:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained

from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

22. Section 13304(c)(1) of the California Water Code provides in part that:

" . . . the person or persons who discharged the waste, discharges the waste, or threatened to cause or permit the discharge of the waste within the meaning of subdivision (a), are liable to that government agency to the extent of the reasonable costs actually incurred in cleaning up the waste, abating the effects of the waste, supervising cleanup or abatement activities, or taking other remedial actions. . . "

23. The State Water Resources Control Board (hereafter State Board) has adopted Resolution No. 92-49, the *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304*. This Policy sets forth the policies and procedures to be used during an investigation or cleanup of a polluted site and requires that cleanup levels be consistent with State Board Resolution 68-16, the *Statement of Policy With Respect to Maintaining High Quality of Waters in California*. Resolution 92-49 and the Basin Plan establish the cleanup levels to be achieved. Resolution 92-49 requires the waste to be cleaned up to background, or if that is not reasonable, to an alternative level that is the most stringent level that is economically and technologically feasible in accordance with Title 23, California Code of Regulations (CCR) Section 2550.4. Any alternative cleanup level to background must (1) be consistent with the maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Board.
24. Chapter IV of the Basin Plan contains the *Policy for Investigation and Cleanup of Contaminated Sites*, which describes the Water Board's strategy for managing contaminated sites. This strategy is based on Water Code Sections 13000 and 13304, the Title 27, Division 2, Subdivision 1 regulations, and State Water Board Resolution Nos. 68-16 and 92-49. The strategy includes site investigation, source removal or containment, information required to be submitted for consideration in establishing cleanup levels, and the bases for establishment of soil and groundwater cleanup levels.
25. The State Water Board adopted the *Water Quality Enforcement Policy*, which states in part: "*At a minimum, cleanup levels must be sufficiently stringent to fully support beneficial uses, unless the RWQCB allows a containment zone. In the interim, and if restoration of background water quality cannot be achieved, the CAO should require the discharger(s) to abate the effects of the discharge. Abatement activities may include the provision of alternate water supplies.*" (*Enforcement Policy*, p. 19.)

26. The Regional Water Board's *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, 4th Edition* (hereafter Basin Plan) designates beneficial uses of the waters of the State, establishes water quality objectives (WQOs) to protect these uses, and establishes implementation policies to implement WQOs. The beneficial uses of the groundwater beneath the site are domestic, municipal, industrial, and agricultural supply.
27. WQOs listed in the Basin Plan include numeric WQOs, and narrative WQOs, including the narrative toxicity objective and the narrative tastes and odors objective for surface and groundwater. The narrative chemical constituent objectives incorporate California Code of Regulations, title 22, and drinking water maximum contaminant levels (MCLs) by reference. Chapter IV of the Basin Plan contains the *Policy for Application of Water Quality Objectives*, which provides that "[w]here compliance with narrative objectives is required (i.e., where the objectives are applicable to protect specified beneficial uses), the Water Board will, on a case-by-case basis, adopt numerical limitations in orders which will implement the narrative objectives." The numerical limits, in micrograms per liter ($\mu\text{g/L}$) for the constituents of concern listed in the following table implement the Basin Plan WQOs.

Constituent	Limits	WQO	Reference
Total Petroleum Hydrocarbons as Gasoline (TPH-G)	5 $\mu\text{g/l}$	Tastes and Odors	McKee & Wolf, <i>Water Quality Criteria</i> , SWRCB, p. 230
Benzene	0.15 $\mu\text{g/l}$	Toxicity	California Public Health Goal (OEHHA)
Toluene	42 $\mu\text{g/l}$	Taste and Odor	Federal Register, Vol. 54, No. 97
Ethylbenzene	29 $\mu\text{g/l}$	Taste and Odor	Federal Register, Vol. 54, No. 97
Xylene	17 $\mu\text{g/l}$	Taste and Odor	Federal Register, Vol. 54, No. 97
Methyl t-butyl ether (MTBE)	5 $\mu\text{g/l}$	Taste and Odor	Federal Register, Vol. 54, No. 97
Tert-Butyl alcohol (TBA)	12 $\mu\text{g/l}$	Health-based advisory	California Department of Health Services
1,2-Dichloroethane (1,2-DCA)	0.4 $\mu\text{g/l}$	Toxicity	California Public Health Goal (OEHHA)

$\mu\text{g/L}$ = micrograms per liter

28. The constituents listed in Finding No. 27 are wastes as defined in California Water Code Section 13050(d), and their concentrations in groundwater beneath the site exceeds the WQOs for the constituents listed in Finding No. 27. The exceedance of applicable WQOs in the Basin Plan constitutes pollution as defined in California Water Code Section 13050(l)(1).
29. The wastes detected at the site are not naturally occurring, and benzene is a known human carcinogen. Pollution of groundwater with these wastes impairs or threatens to impair the beneficial uses of the groundwater.

DISCHARGER LIABILITY

30. As described in Findings 1 and 2, the Dischargers are subject to an order pursuant to Water Code section 13304 because the Dischargers have caused or permitted waste to be discharged or deposited where it has discharged to waters of the state and has created, and continues to threaten to create, a condition of pollution or nuisance. The condition of pollution is a priority violation and issuance or adoption of a cleanup or abatement order pursuant to Water Code Section 13304 is appropriate and consistent with policies of the Regional Water Board
31. This Order requires investigation and cleanup of the site in compliance with the California Water Code, the Basin Plan, Resolution 92-49, and other applicable plans, policies, and regulations.
32. As described in Finding 1 and 2, the Dischargers are subject to an order pursuant to Water Code section 13267 to submit technical reports because existing data and information about the site indicate that waste has been discharged, is discharging, or is suspected of discharging, at the property, which is or was owned and/or operated by the Dischargers named in this Order. The technical reports required by this Order are necessary to assure compliance with Section 13304 of the California Water Code, including to adequately investigate and cleanup the site to protect the beneficial uses of waters of the state, to protect against nuisance, and to protect human health and the environment.
33. If the Dischargers fail to comply with this Order, the Executive Officer may request the Attorney General to petition the superior court for the issuance of an injunction.
34. If the Dischargers violate this Order, the Dischargers may be liable civilly in a monetary amount provided by the Water Code.
35. The issuance of this Order is an enforcement action taken by a regulatory agency and is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et seq.), pursuant to Title 14 CCR Section 15321(a)(2). The implementation of this Order is also an action to assure the restoration of the environment and is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et seq.), in accordance with Title 14 CCR, Sections 15308 and 15330.
36. Any person affected by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with Title 23 CCR Sections 2050-2068. The regulations may be provided upon request and are available at www.swrcb.ca.gov. The State Board must receive the petition within 30 days of the date of this Order.

REQUIRED ACTIONS

IT IS HEREBY ORDERED that, pursuant to California Water Code Section 13000, Section 13304 and Section 13267, Leonard D. Robinson, River City Petroleum Inc, and Douglas Oil Company shall:

1. Investigate the discharges of waste, clean up the waste, and abate the effects of the waste, forthwith, resulting from activities at 510 Washington Blvd, Roseville, Placer County, in conformance with State Board Resolution No. 92-49 *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304* and with the Water Board's *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* (in particular the Policies and Plans listed within the Control Action Considerations portion of Chapter IV). "Forthwith" means as soon as is reasonably possible. Compliance with this requirement shall include, but not be limited to, completing the tasks listed below.
2. All work and reports shall be completed in accordance with Appendix A - Reports, of the Tri-Regional Recommendations for Preliminary Investigation and Evaluation of Underground Storage Tank Sites (Appendix A - Reports) which is attached and made a part of this Order, and under permits required by State, County, and/or Local agencies.

SITE HISTORY

3. By **31 August 2006**, submit a report documenting the site's history since its development as a fuel station, to include a chronology of the site's ownership and operator history, as well as all investigative and remedial activity to have occurred at the site.

REMEDIATION

4. By **31 August 2006**, submit a report documenting the installation, startup, and continued operation of the remedial system as proposed in the 20 July 2005 *Final Remedial Action Plan (RAP)*, and as approved by Regional Board staff in their 3 August 2005 letter.
5. Submit **monthly** status reports for the first three months of system operation for the proposed remedial system, and any subsequent systems that may be installed. At a minimum, the monthly status reports shall include:
 - site maps indicating the capture zone and waste plumes,
 - average extraction rates of all treatment systems,
 - influent and effluent concentrations of TPH-G, benzene, toluene, ethylbenzene, xylene, MTBE TBA, TAME, and 1,2 DCA.
 - mass of hydrocarbons treated during the reporting period and cumulative to date,
 - estimated mass of wastes remaining and predicted time frame for meeting cleanup objectives,
 - running and down time for the remediation system(s),
 - summary of consultant visits to the site, and
 - evaluation of the overall remediation program and recommendations to correct deficiencies or increase efficiency.

MONITORING

6. Conduct monitoring of existing wells, any additional wells, and any operating remedial system or remedial efforts in accordance with MRP No. R5-2006-0805 or any revised MRP issued by the Executive Officer or the Regional Board.

RISK ASSESSMENT

7. By **15 September 2006**, submit a work plan to conduct a soil gas survey. Soil gas samples shall be collected in a grid pattern encompassing the site, the entire plume area, and to optimize detecting and delineating the extent of hydrocarbon vapors in soil, the grid spacing should include biased sampling locations. (e.g. additional sampling locations near the former tanks, piping, and all nearby structures.) The requested soil gas work plan shall be prepared in accordance with the *Guidance For The Evaluation And Mitigation Of Subsurface Vapor Intrusion To Indoor Air*. A copy of this document can be obtained from the following website: <http://www.dtsc.ca.gov/AssessingRisk/>. The work plan must also contain data tables and site map documenting the analytical results and depth collected for all soil samples ever obtained from the site.
8. The results of the required soil gas survey are to be submitted by **15 December 2006**, and **shall include** a work plan to conduct a Tier 2 human health risk assessment. The assessment shall evaluate for both Baseline Carcinogenic Risk and Baseline Toxic Effects for both residential and commercial receptors. All potential pathways including dermal absorption, ingestion, inhalation of dust in outdoor air, and volatilization to indoor air exposure scenarios are to be evaluated. All constituent concentrations detected in soil within the top 10 feet of soil are to be considered when evaluating for dermal absorption, ingestion, and inhalation of dust, and a one-in-a-million target risk level and a target hazard quotient of one are to be used. The site-specific risk assessment must use the Office of Environmental Health Hazard Assessment (OEHHA) toxicity data (California cancer slopes).
9. By **2 February 2007**, submit the results of the required risk assessment. If the risk assessment suggests that the contamination poses a threat to human health, the report **shall** include a workplan to abate the risk or exposure, and the proposed abatement work shall begin within 60 days of approval by staff.

PUBLIC PARTICIPATION

10. By **15 September 2006**, submit a *Public Participation Plan*. The *Public Participation Plan* shall disseminate information to the public regarding the investigation and proposed cleanup activities at the site and solicit the public's concerns/comments. The *Public Participation Plan* shall be updated as necessary to reflect any significant changes in the degree of public interest as the site investigation and cleanup process moves toward completion.

GENERAL REQUIREMENTS

11. As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, have appropriate reports prepared by, or under the supervision of, a registered professional engineer or geologist and signed by the registered professional. All technical reports submitted by the Dischargers shall include a cover letter signed by the Dischargers, or an authorized representative, certifying under penalty of law that the signer has examined and is familiar with the report and that to their knowledge, the report is true, complete, and accurate. The Dischargers shall also state if they agree with any recommendations/proposals and whether they approved implementation of said proposals.
12. Upon startup of any remediation system(s), operate the remediation system(s) continuously, except for periodic and required maintenance or unpreventable equipment failure. The Dischargers shall notify the Water Board within 24 hours of any unscheduled shutdown of the remediation system(s) that lasts longer than 48 hours. This notification shall include the cause of the shutdown and the corrective action taken (or proposed to be taken) to restart the system. Any interruptions in the operation of the remediation system(s), other than for maintenance, emergencies, or equipment failure, without prior approval from Water Board staff or without notifying the Water Board within the specified time is a violation of this Order. Within 7 working days of a shutdown, the Dischargers shall submit a Technical Report containing at a minimum, but not limited to the following information:
 - times and dates equipment were not working,
 - cause of shutdown,
 - if not already restarted, a time schedule for restarting the equipment, and, a Cleanup Assurance Plan to ensure that similar shutdowns do not reoccur. Proposed Cleanup Assurance Plans are to be completed within 30 days of the system shutdown.
13. Notify Water Board staff at least three working days prior to any onsite work, testing, or sampling that pertains to environmental remediation and investigation and is not routine monitoring, maintenance, or inspection.
14. Obtain all local and state permits and access agreements necessary to fulfill the requirements of this Order prior to beginning work.
15. Continue any remediation or monitoring activities until such time as the Executive Officer determines that sufficient cleanup has been accomplished to fully comply with this Order and this Order has been either amended or rescinded in writing.
16. Optimize remedial systems as needed to improve system efficiency, operating time, and/or waste removal rates, and report on the effectiveness of the optimization in quarterly reports.
17. Maintain a sufficient number of monitoring wells to completely define and encompass the waste plume(s). If groundwater monitoring indicates the waste in groundwater has

migrated beyond laterally or vertically defined limits during the quarter, then the quarterly monitoring reports must include a work plan and schedule, with work to begin within thirty days of Water Board staff approval, to define the new plume limits.

18. Electronic copies of all reports and analytical results are to be submitted over the Internet to the State Water Board Geographic Environmental Information Management System database (GeoTracker) at <http://geotracker.swrcb.ca.gov> as required by Title 23, Division 3, Chapter 30 of the California Code of Regulations. This electronic data is to be submitted in addition to the customary hard copy reports and shall be successfully uploaded to Geotracker before the hard copy report is submitted.
19. If, for any reason, the Dischargers are unable to perform any activity or submit any document in compliance with the schedule set forth herein, or in compliance with any work schedule submitted pursuant to this Order and approved by the Executive Officer, the Dischargers may request, in writing, an extension of the time specified. The extension request shall include justification for the delay. An extension may be granted by revision of this Order or by a letter from the Executive Officer.
20. All work and directives referenced in this Order are required regardless of whether or not the UST Cleanup Fund approves the work for reimbursement.
21. If, in the opinion of the Executive Officer, the Dischargers fail to comply with the provisions of this Order, the Executive Officer may refer this matter to the Attorney General for judicial enforcement or may issue a complaint for administrative civil liability.

This Order is effective upon the date of signature.

PAMELA CREEDON, Executive Officer

24 July 2006
(Date)
