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November 12, 2014

Charlie Ridenour
Branch Chief
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826
Attention: Martin Herrmann, Project Manager

Re: Imminent and Substantial Endangerment Determination and Remedial
Action Order, Benicia International Associates Site, 711 Jackson Street,
Solano County, Benicia, California 94510, Docket No. I/SE RAO 13/14-007
(As Amended on October 30, 2014)
Request for Extension

Dear Mr. Ridenour and Mr. Herrmann:

This office represents APS West Coast, Inc. dba Amports, Inc. ["Amports"] (formerly known as "Benicia Industries, Inc.") with regards to the Imminent and Substantial Endangerment Determination and Remedial Action Order for the Benicia International Associates Site, 711 Jackson Street, Solano County, Benicia, California 94510, which was originally issued on June 24, 2014 and which has since been amended to name additional respondents, including Benicia Industries, Inc., as set forth in the Amendment to Imminent and Substantial Endangerment Determination and Remedial Action Order that was issued on October 30, 2014 ["Amended BIA Order"].

As follow-up and pursuant to my communications with Department of Toxic Substances Control ["DTSC"] Counsel Vivian Murai, I respectfully request a sixty-day extension for all tasks and submittals required by the Amended BIA Order, including but not limited to the submittal of the notice discussed in Section 7 of the Amended BIA Order.

Considering that Benicia Industries, Inc. has just been named as an additional respondent in this matter, this extension is requested in order to be afforded the

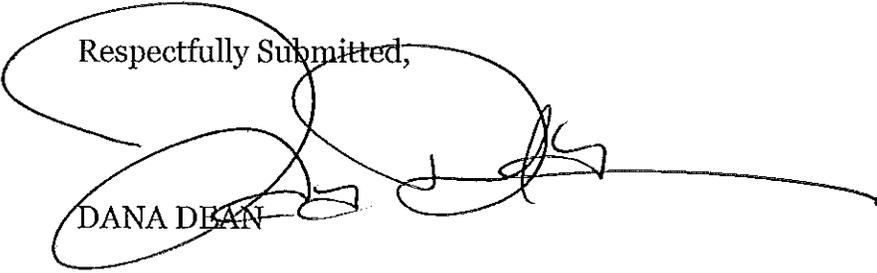
opportunity to properly review the matter as well as to confer with representatives of the other parties and with DTSC itself. Because the original BIA Order was issued more than four months ago, the originally named parties have had more time to review and address the matter (as well as the opportunity themselves to request extensions for the tasks and submittals due pursuant to the BIA Order).

Please note that with this request there is also a reservation of all of the rights pertaining to the Amended BIA Order, including but not limited to the right to present any and all objections, defenses, and challenges to the Amended BIA Order and/or any Remedial Action Plan related to the Amended BIA Order and the right to request an administrative hearing and/or seek judicial review of the Amended BIA Order and/or any Remedial Action Plan related to the Amended BIA Order.

If you have any questions or would like to discuss the matter further, please feel free to contact me at the above-listed number.

Thank you for your courtesy and cooperation with this matter.

Respectfully Submitted,


DANA DEAN

cc: Cecelia C. Fusich, Vernon Law Office (Benicia International Associates)
Rodolfo Jacuzzi (Dynamic Wheels, Inc. FKA International Mfg. Co. Inc.)
Alarice R. Hansberry (U.S. Army Corps of Engineers)
Clients

cc: *(By email only)*
Heather McLaughlin (City of Benicia) (Surplus Property Authority of the City of Benicia)
Vivian S. Murai (Office of Legal Counsel, DTSC)