



May 3, 2007

EPA-HQ-SFUND-2007-0072
Docket Coordinator, Headquarters
U.S. Environmental Protection Agency
CERCLA Docket Office
1301 Constitution Ave.
EPA West, Room 3340
Washington, D.C. 20004

VIA OVERNIGHT DELIVERY

**RE: Halaco Engineering Company Site – Proposed NPL listing –
FDMS Docket ID No. EPA-HQ-SFUND-2007-0072**

To Whom It May Concern:

This letter is submitted on behalf of the Environmental Defense Center (EDC) in support of U.S. EPA's proposal to add the Halaco Engineering Company site – located in Oxnard, California – to the National Priorities List (NPL). Since 2000, EDC and Lawyers for Clean Water have represented EDC and the Santa Barbara Channelkeeper in efforts to ensure full assessment, cleanup and restoration of the Halaco site. As part of our representation, we filed a lawsuit seeking enforcement of the Clean Water Act, Clean Air Act and California's Proposition 65. Due to Halaco's bankruptcy filing in 2003, however, we have been stymied in our efforts at citizen enforcement of environmental protection laws. We believe that adding the site to the NPL will provide the necessary site remediation and protection for the environment and public health.

Site investigation and studies conducted to date demonstrate that the Halaco site poses significant and unacceptable threats to both human health and the environment.

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The addition of this site to the NPL will facilitate further clean up activities that are necessary to fully address these significant threats to human health and the environment. The comment letter submitted by Santa Barbara Channelkeeper includes a detailed analysis of the likelihood of release, waste characteristics, and potential receptors, and it concludes that the site qualifies for NPL listing in accordance with U.S. EPA's own criteria. We incorporate this analysis herein.

For these reasons, EDC joins Santa Barbara Channelkeeper, the Ventura County Board of Supervisors, and the City of Oxnard in support of U.S. EPA's proposal to add the Halaco site to the NPL. We also join these entities in urging U.S. EPA to ensure that all on-site hazardous substances are removed from the site.

Thank you for the opportunity to comment on this proposal.

Sincerely,

/s/

Linda Krop
Chief Counsel