control landfill gas.

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1. We note with approval that the District checks randomly selected loads for hazardous liquid wastes. Those samples indicate that only one-half of 1 percent by weight of such wastes now enter the site.

c. A site drainage plan for diversion and control of rainfall runoff.

d. A comprehensive groundwater monitoring program with an implementation time schedule. The program shall include specific locations, depths, details, drawings and design specifications for needed monitoring and/or observation wells to be utilized in the groundwater sampling and testing program.

5. The site shall be protected from any washout that could occur as a result of a 100-year storm.

6. Gases and leachate shall be prevented from unreasonably affecting groundwater.

7. The discharger shall ensure that wastes will be placed above the highest anticipated elevation of the capillary fringe of underlying groundwater.[2/]

8. The discharger shall comply with all monitoring and testing requirements established by this Board's Executive Officer.

At the conclusion of the six-month period accorded to the District to submit technical reports and protective plans, the Regional Board will review the technical reports and make appropriate revisions to the waste discharge requirements. This revised permit will include a time schedule for implementation of the plans. Thus, Order No. 81-12 is, in effect, an interim

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2. The thickness of the capillary fringe is dependent on the grain size of the soil and commonly ranges from up to 10 feet thick in clays to negligible in gravels. At the Calabasas site, groundwater levels have been determined to be over 200 feet deep. Thus, even with a maximum capillary fringe, waste deposition will still be far above the top of the capillary fringe.

order, designed to allow the District and the Regional Board staff time to further evaluate geologic conditions and to determine whether state of the art techniques can be utilized to protect against substandard permeability conditions.

I. DISCUSSION

The State Board may refuse to review a Regional Board order if the petition fails to raise substantial issues that are appropriate for review. While the homeowner petitioners have raised substantial issues concerning their safety as it may be affected by the groundwater and methane gas build-up, we believe the Regional Board order has taken appropriate interim remedial action in view of the evidence available at this time. Though both short-term and long-term bedrock permeability do not meet current standards, there is no evidence that liquid wastes have migrated through alluvium to existing shallow groundwater monitoring wells. In addition, the challenged order provides for complete updating of the site drainage plan. Implementation of that plan will divert all surface water from surrounding areas. Construction of the proposed clay barriers at drainage points will provide added protection. These barriers will be installed to cut off possible migration of leachate through alluvial materials that are in the canyon bottoms leading away from the site. Approximately 20 shallow wells will be constructed in conjunction with these barriers. This system of barriers and shallow wells is designed to prevent the lateral movement of leachate from the site.

Finally, a comprehensive groundwater monitoring program is required by the order. In this regard, the District is requesting proposals from hydrogeology consultants concerning the locations and specifications of wells which will be installed into bedrock at the site. These proposed wells will monitor for groundwater quality variation caused by deep percolation of waste-affected fluids.

Excessive permeabilities in soils overlying groundwater cause us concern. We are particulary concerned with the lack of data regarding vertical permeability. However, given the limited evidence now available, we think the Regional Board order is reasonable. It allows time to further assess the geologic characteristics of the site and to evaluate state of the art methods of leachate containment, while at the same time implementing measures to contain leachate migration which might be occurring. However, because of our concern, we will require the Regional Board Executive Officer to furnish us monthly reports on the status of on-going studies and containment plans.

The Regional Board order contains no findings of fact concerning methane gas build-up. Though petitioners ask for closure of the landfill because of methane gas build-up, they admit in their petition that the extent of the problem is not known, referring to a "substantial methane gas problem". The State Solid Waste Management Board evaluated the site on June 2, 1981, and found it in compliance with the Federal Resource Conservation and Recovery Act standards for explosive gases and

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fires. No gas was detected at probes in the border of the landfill that is adjacent to homes. In view of this and the fact that Order No. 81-12 provides for a plan of collection and control of gas, intervention by the State Board is not appropriate at this time.

II. CONCLUSION

We have decided to dismiss the petition without prejudice to the cause of the petitioners. As stated above, the Regional Board is scheduled to issue additional revised waste discharge requirements after October 30, 1981, when the technical reports required by the Order must be submitted. We expect the revised waste discharge requirements to be adopted at or before the February 1982 Regional Board meeting. If this permit is not noticed in the agenda for the February Regional Board meeting, the Regional Board should contact the State Board with good cause for delay. Following the adoption of these revised waste discharge requirements, petitioners may either file another petition or they may renew the present petition with amendments and augmentation needed to update it and bring it into compliance with Title 23, California Administrative Code, Section 2050. On the other hand, further action by the Regional Board may satisfy petitioners' concerns and render unnecessary further review by us. If new requirements are not adopted by February 1982, the petitioners may renew the present petition subject to compliance with Section 2050.

III. ORDER

IT IS, THEREFORE, ORDERED that this matter be dismissed without prejudice.

IT IS FURTHER ORDERED that:

1. The Regional Board's Executive Officer furnish the State Board monthly status reports on the progress of the studies and containment plans.

2. The Regional Board revise the waste discharge requirements by February 1982 unless good cause exists for delay.

DATED: August 20, 1981

/s/ Carla M. Bard
Carla M. Bard, Chairwoman

/s/ L. L. Mitchell
L. L. Mitchell, Vice-Chairman

/s/ Jill B. Dunlap
Jill B. Dunlap, Member

/s/ F. K. Aljibury
F. K. Aljibury, Member