

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

In the Matter of the Petition of )  
 )  
MAIN SAN GABRIEL BASIN )  
WATERMASTER )  
 )  
For the Review of Order No. 88-133, )  
Waste Discharge Requirements of the )  
California Regional Water Quality )  
Control Board, Los Angeles Region. )  
Our File No. A-597. )  
\_\_\_\_\_ )

ORDER NO. WQ 89-17

BY THE BOARD:

On November 28, 1988, the California Regional Water Quality Board, Los Angeles Region (Regional Board) issued waste discharge requirements (requirements) to Azusa Land Reclamation Company, Inc. (ALR) in Order No. 88-133. The Order establishes revised waste discharge requirements for the continued operation and expansion of an existing landfill. On December 28, 1988, the State Water Resources Control Board (State Board) received a timely petition from the Main San Gabriel Basin Watermaster (Watermaster or Petitioner), requesting review of the requirements and a stay of Order No. 88-133.<sup>1</sup> The petition requested that the State Board deny issuance of waste discharge requirements for expansion of the landfill. In the alternative, the Petitioner requests that the State Board vacate the requirements and order the Regional Board to reconsider them in

<sup>1</sup> The stay request will not be considered because this Order resolves the issues raised in the petition on the merits.

light of regulations the State Board may adopt relating to Government Code Section 66758.2

### I. BACKGROUND

The landfill operated by ALR is located in the central part of the San Gabriel Valley. The landfill operation is within an active sand and gravel quarry. Approximately 80 acres of the total site have nonhazardous waste currently in place, and about 13.6 acres contain inert waste. Pursuant to the prior waste discharge requirements, Order No. 86-59, waste disposal in the existing operation is allowed only to 355 feet above sea level. The expansion of the landfill will allow waste disposal in a currently unused area in the northwest portion of the site. Under the new waste discharge requirements adopted by the Regional Board, waste disposal would be allowed from a low elevation of 330 feet above sea level to a high elevation of approximately 580 feet above sea level.

The landfill lies within the Main San Gabriel Hydrologic Subarea, ground waters of which are beneficially used for municipal, industrial, and agricultural water supply. It is located one mile to the east of the San Gabriel River and the Santa Fe Spreading Grounds, which are important recharge areas for the basin. Additionally, the landfill is located on rock debris deposited by the San Gabriel River, and is underlain by Holocene alluvium derived from the San Gabriel mountains to the

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<sup>2</sup> This Government Code Section will be discussed, infra. It is necessary to point out at the outset, however, that there is no legislative directive to this Board to adopt implementing regulations.

north. Very coarse sand, gravel, cobbles and boulders are characteristic of the alluvium. Only minor amounts of silt and clay are present. The material is highly permeable and will transmit water readily. The ground water beneath the site is used as a drinking supply for more than one million people. The San Gabriel Basin is currently polluted by solvents,<sup>3</sup> and is the subject of an Environmental Protection Agency (EPA) Superfund project.

Since the 1960's, the landfill has been operating under waste discharge requirements issued by the Regional Board. (Orders 60-22 and 86-59.) In 1987, ALR submitted to the Regional Board a report of waste discharge, wherein it requested approval for expansion beyond the current areas of waste disposal. On May 23 and June 10, 1988, the Regional Board took actions denying waste discharge requirements for the proposed expansion.<sup>4</sup> ALR then filed a revised report of waste discharge on June 10, 1988, in which ALR proposed a revised liner system for the expansion area.

On November 28, 1988, the Regional Board adopted waste discharge requirements, basing its decision on the addition of a

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<sup>3</sup> There is much discussion in the petition and ALR's response thereto, concerning whether the existing landfill has contributed to contamination of the ground water. Resolution of that issue is not necessary to review of the petition, and will not be decided here.

<sup>4</sup> ALR filed petitions with the State Board asking for review of the Regional Board's failure to adopt waste discharge requirements. Upon the Regional Board's adoption of waste discharge requirements in the Order under review, ALR withdrew its petition.

synthetic liner to the previously-proposed clay liner. In adopting these requirements, which allow the proposed expansion, the Regional Board rescinded Orders Nos. 60-22 and 86-59. On December 28, 1988, this Board received a petition from the Main San Gabriel Basin Watermaster requesting review of the waste discharge requirements issued to ALR.

The waste discharge requirements in dispute were adopted pursuant to our "Subchapter 15" regulations. (Title 23, California Code of Regulations, Section 2510 and following.) These regulations were substantially revised in 1984 to establish waste and siting classification systems and minimum waste management standards for waste treatment, storage, and disposal in landfills, surface impoundments, waste piles, and land treatment facilities. The intent of the regulations is to insure that water quality is protected when wastes are discharged to land. The Subchapter 15 regulations establish minimum requirements which Regional Boards must follow in permitting waste discharges to land. Regional Boards can also impose more stringent requirements in specific cases, as can the State Board in reviewing Regional Board actions. Engineered alternatives to Subchapter 15 requirements may be approved. The landfill is classified as a Class III landfill pursuant to the classification criteria of Subchapter 15, and, thus, is authorized by the waste discharge requirements to accept nonhazardous solid waste and inert waste.

## II. CONTENTIONS AND FINDINGS

1. Contention: Petitioner contends that the waste discharge requirements are not based on proper findings regarding future anticipated ground water levels.

Finding: Subchapter 15 requires that all new and existing landfills, "shall be operated to ensure that wastes will be a minimum of 5 feet above the highest anticipated elevation of underlying groundwater". (Title 23, Cal. Code of Regulations, Section 2530(c); emphasis added.)<sup>5</sup> In addition to the specific requirement of a five-foot separation, Section 2533(a) requires:

"Class III landfills shall be located where site characteristics provide adequate separation between nonhazardous solid waste and waters of the state."

The requirements adopted by the Regional Board allow waste disposal to 330 feet above mean sea level (MSL). In finding 10, the requirements state that the historic high water level at the site was 345 feet above MSL, and that this level was reached in 1944. However, the Regional Board found that due to changes in basin development and management practices, the highest level reported at the site since 1944 was 309 feet above MSL. The Regional Board concluded that waste disposal at 330 feet above MSL "...under present conditions, will comply with Subchapter

<sup>5</sup> New landfills must also be sited, designed and constructed to ensure that wastes will be a minimum of 5 feet above ground water. (Section 2530(c).) The expansion of the landfill is subject to the same requirements as for new landfills by virtue of Section 2510(d), which provides:

"...waste management units, including expansions and reconstructions of existing waste management units, shall comply with all applicable provisions of this subchapter...."

15." (Emphasis added.) Watermaster contends that the Regional Board should have considered its right to store and manage ground water in determining the highest anticipated ground water levels.

Upon our review of the evidence contained in the record, and specifically the hydrologic data presented by ALR, we conclude that the Regional Board's finding that the highest ground water elevation, since 1944, has not exceeded 309 feet above MSL may not be accurate. In our view, the evidence in the record indicates that ground water levels, in recent years, may have exceeded the 325-foot level. For example, the record of well water levels measured in the vicinity of the landfill expansion, while conflicting, suggests that unconfined ground water table elevations immediately beneath the landfill may have exceeded 325 feet during 1958, 1969 and 1983.

Water level data also rebut ALR's assertion that changes in basin development and management practices have prevented and will prevent ground water from rising to previous highs of 1944. In fact, because of present recharging and anticipated increases in recharge efforts, future wet periods could occur when water levels are higher than historic levels. Rather than providing support for the finding that basin development and management practices are impeding rising ground water levels, the climatologic factors (duration and intensity of precipitation) and the human factors (nearby ground water recharge "spreading grounds") would lead to the conclusion that ground water levels may in fact rise above historical levels. There are numerous ground water recharge basins and spreading

grounds within 1-2 miles of the site and Los Angeles County Department of Public Works is presently installing an additional basin within one-mile south of the site.<sup>6</sup> Thus, we conclude that the Regional Board's findings regarding anticipated ground water levels are inappropriate.

Available data also calls into question the Regional Board's finding that ground water levels will not reach historical levels because storage at water levels approaching the bottom of the landfill would result in flooding of the San Gabriel Freeway. ALR contended that if water levels below the site reach 325 feet, then water levels near the freeway would cause flooding.<sup>7</sup> However, our review of the record does not support the hypothesis that water levels beneath the site are directly correlated to water levels near the freeways. We cannot concur in the Regional Board's finding that ALR presented "compelling evidence" that if the groundwater level were permitted to rise to the 330 foot level, severe flooding in the area of the Freeway would occur. The "freeway flooding" argument ignores the immediate recharge effects of the San Gabriel River on the two wells completed adjacent to the river channel. It ignores the local recharge influence of nearby gravel mining operations. It ignores the intervening distance between the site

<sup>6</sup> The storage of water underground is a beneficial use of water. Cal. Water Code Section 1242. Public agencies have the right to store imported water. City of Los Angeles v. City of Glendale, 23 Cal.2d 68, 142 P.2d 289 (1943), City of Los Angeles v. City of San Fernando, 14 Cal.3d 199, 537 P.2d 1250, 123 Cal.Rptr. 1, (1975), Niles Sand & Gravel Co. v. Alameda County Water District, 37 Cal.App.3d 974, 112 Cal.Rptr. 846 (1974).

<sup>7</sup> The water well located near the freeway is LACFCD well 3000B.

and the freeways. Finally, this argument ignores the fact that the freeway's engineering design, construction, and maintenance features all serve to prevent flooding.

Upon review of the entire record before the Regional Board, we conclude that there is a reasonable likelihood that ground water could reach within five feet of waste if the landfill is operated in accordance with the Regional Board's order. However, as discussed below, ALR has now agreed that it will limit waste disposal to the 355 foot level.

2. Contention: Petitioner contends that, by permitting the expansion of the landfill, the waste discharge requirements allow an unacceptable risk to ground water quality of an already-polluted Basin.

Finding: The fact that the San Gabriel Basin is currently polluted is not refuted. The EPA has placed the Basin on its National Priority List for cleanup under the Superfund program. This Board has recognized the magnitude of the pollution problem in adopting Resolution No. 88-114, which states that a coordinated ground water management effort is needed for water quality improvement as well as water supply. The resolution urges the Watermaster to assume a lead role in coordinating the response to the Basin's water quality problems, and in taking all necessary actions to stop further pollution. Given the presence of pollutants in a water body which is currently the sole drinking water supply for a large populace, we must take all reasonable actions to prevent further pollution.



In determining the reliability of the proposed landfill design to prevent further pollution of the ground water, we look to the requirements of Subchapter 15.<sup>8</sup> We also consider recent legislation regulating landfills sited in gravel pits. While this legislation did not go into effect until after the Regional Board had adopted the requirements, we believe that the language set forth therein should be considered.

As was discussed in the preceding section, Subchapter 15 requires that there be adequate separation--at least five feet--between waste disposal and ground waters. Based on our review of the evidence, adequate separation may not have existed if expansion had proceeded as authorized by the Regional Board. However, the level at which waste can be disposed has been raised as will be discussed below.

Section 2533(b)(1) of Subchapter 15 also requires that Class III landfills:

"...be sited where soil characteristics, distance from waste to ground water, and other factors will ensure no impairment of beneficial uses of surface water or of ground water beneath or adjacent to the landfill."

Section 2533(b)(1) lists "other factors" to be considered, including permeability and transmissivity of underlying soils, depth to ground water, background quality of ground water, current and anticipated use of the ground water, and annual precipitation.

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<sup>8</sup> We note that the requirements in Subchapter 15 represent minimum standards for waste management. (Title 23, Calif. Code of Regulations, Section 2510(a).) Regional Boards may impose more stringent requirements (id.), including prohibiting all discharges of waste in certain areas (Water Code Section 13243).

Section 2533(b)(2) states:

"Where consideration of the factors in [Section 2533(b)(1)] indicates that site characteristics alone do not ensure protection of the quality of ground water or surface water, Class III landfills shall be required to have a single clay liner...."

In adopting the requirements, the Regional Board found that the site is underlain by an alluvium which is characterized by very coarse sand, gravel, cobbles and boulders. The Regional Board concluded that the material is highly permeable and will transmit water readily. Further, the Regional Board found that the ground water is used for drinking and that it is polluted. Finally, as we have stated above, we have concluded that there is not adequate separation from the area of waste disposal to ground waters.

Based on the factors listed in Section 2533(b)(2), the Regional Board correctly concluded that the site of the landfill does not ensure that there will be no impairment of beneficial uses of ground water beneath the site. The Regional Board therefore concluded that Section 2533(b)(2) requires that the landfill be underlain by a clay liner. However, even with the addition of a clay liner, and, in this case, a synthetic liner, it is our conclusion that the operation of the landfill in accordance with the waste discharge requirements as issued by the Regional Board may not ensure the protection of beneficial uses of the underlying of the ground water.<sup>9</sup> Our conclusion is based

<sup>9</sup> Section 2533(b) of Subchapter 15 requires that landfills be sited either where the factors listed in subsection (b)(1) ensure no impairment of beneficial uses to state waters, or, where those factors "alone" do not provide assurance, that the landfill include a clay liner (subsection (b)(2)). Whether the landfill design requires a clay liner or not, there must be assurance that there will be no impairment of uses.

on a number of factors, including the highest anticipated future ground water levels (discussed above), the site geology, the presence of existing pollution of a drinking water supply, and the adoption of a new law prohibiting the siting of landfills in gravel pits.

The site is located in a geologic setting that is ideally suited to receive, store, and transmit large volumes of potable water. Logically, an environment suited for rapid ground water recharge is the least suited for waste disposal. The alluvial fan underlying the site has an infiltration rate that would allow material leaking from a landfill to reach ground water five feet below in less than 2.5 days. While the liner system approved by the Regional Board is extensive, we cannot conclude, in this specific case, that the liner will ensure protection of water quality. Should a leak occur, infiltration to ground water will be rapid, and the record demonstrates the vulnerability of the ground water basin to pollution.

In addition to our own concerns regarding the risk of ground water pollution if the landfill expansion were permitted, we find it appropriate to consider recent legislation prohibiting the issuance of waste discharge requirements to landfills sited in areas used for mining or excavation of gravel or sand.<sup>10</sup> At

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<sup>10</sup> Government Code Section 66758(a) states:

"Notwithstanding any other provision of law, a regional board shall not issue a waste discharge permit for a new landfill, or a lateral expansion of an existing landfill, which is used for the disposal of nonhazardous solid waste if the land has been primarily used at any time for the mining or excavation of gravel or sand."

the time of the Regional Board's issuance of the requirements, Government Code Section 66758 had been adopted, but had not gone into effect.<sup>11</sup> The legislation, as AB 3804 (Mountjoy), had been signed by the Governor prior to adoption of requirements. Thus, while not legally binding on the Regional Board at the time it acted, we believe that the Board should have looked to the legislation. We will do so at this time.

While the Regional Board did not include a finding regarding Government Code Section 66758, the staff report did include a statement that the site would qualify for a variance under subsection (b). Subsection (b) provides:

"A regional board, in a public meeting, may grant a variance from subdivision (a) if the applicant demonstrates and the regional board determines that the discharges to a new facility or expansion of an existing facility during its operation and postclosure period will not pollute or threaten to pollute the waters of the state. In deciding whether to grant a variance, the regional board shall consider, among other factors, site characteristics, including permeability and transmissivity of the underlying soils and depth to groundwater. For the purpose of the section, "groundwater" means the uppermost aquifer useable for beneficial purposes."

The express wording of the subsection provides for the Regional Board to consider various factors to determine if a site should be granted a variance. While the Regional Board's staff report states that the proposal by ALR and approved by the Regional Board would appear to meet the requirements for a variance, we cannot agree with that conclusion. The factors which must be considered in granting a variance include

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<sup>11</sup> The Regional Board issued the requirements on November 28, 1988 and Section 66758 went into effect on January 1, 1989.

permeability, transmissivity, and depth to ground water. In the case of the ALR landfill, all of these factors point to denial of a variance. While the extensive liner system approved by the Regional Board might provide some justification for a variance, it is not sufficient to overcome all of the factors listed in the legislation. Therefore, a variance from the prohibition is not appropriate for the landfill expansion as approved by the Regional Board.<sup>12</sup>

3. Contention: We will review on our own motion the issue of whether additional engineered and/or mitigation features could address the water quality concerns outlined above.

Finding: In reviewing an action of a Regional Board, we are authorized to consider, in addition to the record before the Regional Board, any other relevant evidence. Water Code Section 13320; Title 23, Calif. Code of Regulations, Sections 2064 and 2066.

After our July 3, 1989 workshop discussion of this item, we requested ALR to provide information regarding possible additional measures that could be taken to ensure adequate separation between the expanded landfill and underlying ground water. In response, ALR has proposed a dedicated ground water barrier system. This ground water barrier would be installed beneath the liner system approved by the Regional Board. Whereas

<sup>12</sup> It should be noted that legislation going into effect on 1/1/90 would make variances unavailable to expansions in sand and gravel areas in the Basin (Calif. Stats 89, Chapter 736). This legislation does not effect our review of the Regional Board's action of last year.

the purpose of the latter system is to prevent waste from escaping the landfill, the ground water barrier system's purpose is to prevent ground water from entering the landfill expansion area. The system would consist of four layers: A layer of 60 mil HDPE on top of a six-inch prepared subgrade layer. On top of the 60 mil HDPE would be a "geonet" drainage layer and a geotextile layer. The ground water barrier would follow the slope of the liner up to an elevation of 345 feet and would include a separate drainage system.

Based on our review of the system, we find that the ground water barrier system, along with the previously approved liner system, would ensure adequate separation between the waste and waters of the state. We additionally find that the system, when added to the extensive containment system, will adequately protect water quality. Accordingly, we will approve the waste discharge requirements with the addition of provisions which require the design, construction, and operation of the ground water barrier system.<sup>13</sup>

In addition to the ground water barrier system, ALR is prepared to build several ground water treatment plants -- tentatively one on ALR's property and two offsite. ALR would then make these plants available for immediate operation by Watermaster, the State or EPA to begin cleaning up the plume of volatile organic chemicals (VOC) contamination in the Azusa/Baldwin Park area. The onsite treatment plant would also

<sup>13</sup> This system is approved as a specific engineered alternative to the five-foot separation requirement. See Title 23, Calif. Code of Regulations, Section 2510. However, as indicated below, ALR has agreed to limit its disposal to 355 foot level, thereby satisfying the 5-foot separation requirement.

allow a response if VOCs ever leaked from the new lined areas of the ALR landfill.

Specifically, ALR proposes to pay the capital costs of building the air stripping treatment plants, with vapor-phase carbon off-gas treatment equipment, if necessary. One of these plants would be on the ALR site. Under ALR's proposal, the other plants would be built offsite at locations and acquired by the Superfund agencies. ALR indicates that its proposal is flexible and could be modified as deemed appropriate in the implementation phase. ALR states that they will place \$20 million in escrow by November 2, 1989 to fund the construction of the treatment plants. ALR is also prepared to similarly contribute an aggregate of \$500,000 toward the cost of technical work in order to review and implement the plan.

We find that this proposal would serve as an additional mitigation measure to offset whatever risks to water quality remain.

Finally, ALR has proposed to limit the expansion such that waste disposal would occur only to a level of 355 feet above sea level. This proposal provides additional assurances regarding adequate separation between the waste and waters of the state.<sup>14</sup>

### III. CONCLUSIONS

1. The Regional Board's issuance of waste discharge requirements for the landfill expansion could have resulted in a

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<sup>14</sup> Raising the elevation at which waste is disposed will necessitate changes in the elevations of the various containment features.

situation where ground water will come within five feet of the level of waste disposal. Although the Regional Board approved an extensive liner system, we conclude that this system may not have ensured protection of the beneficial uses of the underlying ground water.

2. The addition of a ground water barrier system to the already approved liner system will ensure adequate separation between the waste and underlying ground water.

3. The proposal to limit waste disposal to the 355-foot elevation provides additional assurances regarding adequate separation.

4. The proposal to pay the capital costs of building several ground water treatment plants serves as an additional mitigation measure.

5. The requirements adopted in Order No. 88-133 should be revised as follows to ensure adequate water quality protection and thereafter be remanded to the Regional Board for implementation:

a. Waste disposal at the landfill will be limited to the 355-foot elevation.

b. ALR will be required to design, construct, and install its ground water barrier system proposal.

c. ALR will be required to place \$20 million in escrow by November 2, 1989 to fund its ground water treatment plant proposal.



d. ALR will be required to place \$500,000 in escrow by November 2, 1989 to fund technical work in order to review and implement the ground water treatment plant proposal.

#### IV. ORDER

IT IS HEREBY ORDERED that the petition is denied.

IT IS FURTHER ORDERED that Waste Discharge Requirements Order No. 88-133 of the Los Angeles Regional Water Quality Control Board is amended as follows (changes shown in underline format where appropriate):

1. The caption of the waste discharge requirements is amended to read in relevant part: Order No. 88-133 as amended by State Board Order No. WQ 89-17.

2. Finding No. 3 of Order No. 88-133 is revised to add the following statement: After adoption of Order No. 88-133, the Main San Gabriel Basin Watermaster filed a petition for review with the State Water Resources Control Board (State Board). During its consideration of this petition, the State Board requested ALR to provide additional information regarding a ground water barrier system. ALR provided such information and also proposed to limit waste disposal to the 355-foot elevation and to fund remedial cleanup efforts in the San Gabriel Basin.

3. Finding No. 10 of Order No. 88-133 is revised to read:

The historic high ground water elevation at the site was about elevation 345-feet above Mean Sea Level (MSL), occurring in 1944. The discharger had proposed in its ROWD

that disposal be permitted to an elevation of 330 feet MSL. During the State Board's review of this matter, the discharger modified this proposal to 355 feet MSL. Subchapter 15, Section 2530(c), requires that landfills be operated to ensure that wastes will be a minimum of five feet above the highest anticipated elevation of underlying ground water. Even though there have been changes in basin development and management practices since 1944, there is a reasonable likelihood that ground water elevations could reach or exceed 325 feet. Given this likelihood, the landfill expansion must be designed, constructed, and operation to ensure adequate separation between the wastes and ground water.

4. Finding No. 11 is revised to add the following:

The State Board, during its consideration of the petition from Watermaster received further conceptual plans and information from the discharger which describe additional measures to satisfy the requirements in Subchapter 15. These plans satisfy the requirements of Subchapter 15, Section 2510, regarding engineered alternatives to Subchapter 15. ALR also submitted proposals to the State Board agreeing to fund \$20 million in cleanup projects in the Basin and to limit waste disposal to the 355-foot elevation.

5. Finding No. 12 is revised to read:

The proposed future Class III disposal area consists of three areas for proposed future disposal: the transition

area, the first fully lined area, and the balance of the undeveloped area of the site. These areas will encompass approximately 220 acres and extend from a low elevation of 355 feet MSL to a proposed high elevation of about 580 feet MSL. The final elevation will permit the development of a 3 percent slope to native elevations to assure adequate runoff of precipitation on the site.

6. Finding No. 14 is revised to add the following:

Conceptual plans for additional liner systems were submitted by the discharger in connection with the State Board's review of Watermaster's petition. A ground water barrier system was submitted. The ground water barrier would be installed outside the liner system approved by the Regional Board and would consist of four layers: A layer of 60 mil HDPE on top of a six-inch prepared subgrade layer. On top of the 60 mil HDPE would be a "geonet" drainage layer and a geotextile layer. The ground water barrier would follow the slope of the liner up to an elevation of 370 feet and would include a separate drainage system. During the State Board's consideration of Watermaster's petition, ALR also agreed to two additional measures: limiting waste disposal to the 355-foot level and funding \$20 million in cleanup projects in the San Gabriel Basin.

7. Provision C.4 is revised to read:

No wastes other than inert wastes shall be placed below elevation 355 feet MSL, USGS datum.

8. The general requirements for disposal of wastes are amended to add provision 18:

The landfill expansion shall be designed, constructed, and operated to provide adequate separation between waste and waters of the state.

9. Provision F.7.h. is revised to read:

h. The liner, leachate collection, ground water barrier system and side slope protection systems shall be constructed according to the design specifications furnished to this Board by the discharger. Any deviation from these design specifications is subject to the Executive Officer's review and approval prior to any construction.

10. Provision F.9 is revised to add the following requirement:

The discharger shall submit detailed preliminary and as-built plans, specifications, and descriptions for the ground water barrier system required by State Board Order No. WQ 89-17. These materials shall be submitted in accordance with a schedule established by the Executive Officer.

11. Provision F.30 is added to read:

Approval of this Order is contingent on ALR complying with State Board Order No. WQ 89-17 requirements regarding (a) the ground water barrier system, (b) limiting waste disposal to 355 feet MSL, and (c) funding \$20 million in cleanup projects in the Basin.

IT IS FURTHER ORDERED that ALR place \$20.5 million in escrow by November 2, 1989 to fund the ground water treatment plant proposal, including review and implementation thereof.

IT IS FURTHER ORDERED that the matter is remanded to the Regional Board for implementation and action consistent with this order.

CERTIFICATION


The undersigned, Administrative Assistant to the Board, does hereby certify that the foregoing is a full, true, and correct copy of an order duly and regularly adopted at a meeting of the State Water Resources Control Board held on October 3, 1989.

AYE: Darlene E. Ruiz  
Eliseo M. Samaniego  
Danny Walsh

NO: W. Don Maughan  
Edwin H. Finster

ABSENT: None

ABSTAIN: None

  
Maureen Marche  
Administrative Assistant to the Board

