

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

ORDER NO. 96-014

WATER RECLAMATION REQUIREMENTS
FOR
THE INDEPENDENT ORDER OF FORESTERS
(Forester Haven Wastewater Treatment Plant)
(File No. 63-158)

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), finds:

1. The Independent Order of Foresters (hereinafter Reclaimer) owns and operates Forester Haven, a retirement home, located at 12249 North Lopez Canyon Road, San Fernando, California (Figure 1). Treated domestic and commercial wastewater is reclaimed for restricted access greenbelt and firebreak irrigation under Waste Discharge Requirements and Water Reclamation Requirements contained in Order No. 88-014, adopted by this Regional Board on January 25, 1988.
2. The California Water Code Section 13263(e) provides that all requirements shall be reviewed periodically and, upon such review, may be revised by the Regional Board. A review of the current requirements, followed by site inspections, were conducted by Regional Board staff, and no violations were observed.

These Water Reclamation Requirements have been revised to reflect current wastewater treatment processes, and include additional findings, effluent limitations, prohibitions, specifications for reclaimed water use, updated standard provisions, and an expanded monitoring and reporting program.

3. The Reclaimer operates a retirement home with medical and kitchen facilities, and a laundry and maintenance yard onsite. An average of 125 residents and staff have occupied Forester Haven during 1994. Medical waste is hauled offsite by a commercial waste hauler for legal disposal.
4. The Reclaimer operates a tertiary wastewater treatment plant (Plant) in order to provide an effluent that complies with all Title 22 Water Reclamation Requirements for landscape irrigation of hillside slopes and greenbelt areas adjacent to the retirement facilities. The Plant has a design capacity of 45,000 gallons per day (gpd). The treatment plant has three separate parallel secondary treatment systems. Two 15,000 gpd parallel systems are operated under normal conditions and the third 15,000 gpd system is maintained for back-up and emergency capacity. The average daily dry weather flow during 1994 was 13,600 gpd.

5. Current wastewater treatment consists of a comminutor/bar screen combination, extended aeration activated-sludge, clarification, rapid sand filtration, chlorination, and storage in a 60,000 gallon concrete-lined pond. Liquid waste sludge is pumped from the plant aeration tanks for storage in an unlined sludge pond. Sludge is removed from the sludge pond by a commercial waste hauler for disposal in a City of Los Angeles manhole. The sludge pond will be lined and an emergency standby power generator will be added as specified in the Order.

There is additional effluent storage in a 130,000 gallon concrete lined pond located down-canyon from the Plant site. Excess effluent is stored there during rainy weather and can be pumped back to the Plant for chlorination, or it can be spray irrigated directly onto 1.5 acres of side slope landscape adjacent to the storage pond.

6. Two small water softeners, located in the cafeterias, produce brine waste that is discharged to the Plant. Up to four pounds per day of brine waste is discharged to the Plant. The discharge of brine waste to the Plant has resulted in periodic chloride exceedances. The water softeners are not required for safe operation of kitchen equipment or for specific medical purposes. The Reclaimer will discontinue the discharge of brine waste to the Plant within three months of adoption of this Order.
7. The Plant, storage ponds, and areas of reclaimed water use are located in and around Section 36, T3N, R15W, San Bernardino Base and Meridian. The facility's latitude is 34° 17' 57" ; its longitude is 118° 23' 53".
8. The Plant and spray irrigation areas are located within the San Fernando Hydrologic Area in the Los Angeles River Basin and overlie the San Fernando Groundwater Basin. Groundwater in this area has existing beneficial uses as municipal supply, agricultural supply, and industrial service and process supply.
9. The Reclaimer will operate and maintain the Plant, storage ponds, and spray irrigation facilities for reclaimed water use.
10. The City of Los Angeles Department of Water and Power provides potable water to the facility which is a blend of local well water and imported surface water.
11. Incidental groundwater recharge associated with landscape irrigation is not expected to have adverse impacts on receiving groundwater quality, even though treated wastewater has periodically exceeded water quality objectives for total dissolved solids and chloride. Concentrations of total dissolved solids and chlorides in the treated wastewater are expected to meet water quality objectives when the water softener brine discharge is discontinued.
12. The Board adopted a revised Water Quality Control Plan for the Los Angeles Region on June 13, 1994. The Water Quality Control Plan contains beneficial uses and water quality

objectives for groundwater within the San Fernando Groundwater Basin. The requirements contained in this Order, as they are met, will be in conformance with the goals and objectives of the Water Quality Control Plan.

13. Section 13523 of the California Water Code provides that a Regional Board, after consulting with and receiving the recommendations from the State Department of Health Services (SDHS), and after any necessary hearing, shall, if it determines such action to be necessary to protect the public health, safety, or welfare, prescribe Water Reclamation Requirements for water which is used, or proposed to be used, as reclaimed water.

Section 13523 further provides that such requirements shall include, or be in conformance with, the statewide reclamation criteria.

14. Regional Board staff have consulted with the SDHS regarding the current reclamation of tertiary-treated wastewater, which is to be used for restricted access irrigation, and has incorporated the SDHS findings and recommendations.
15. The use of reclaimed water for landscape irrigation could affect the public health, safety, or welfare; requirements for such use are therefore necessary in accordance with Section 13523 of the California Water Code.
16. This project involves an existing facility, and, as such, is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 2100 et seq.) in accordance with Title 14, California Code of Regulations, Chapter 3, Section 15301.

The Regional Board has notified the Reclaimer and interested agencies and persons of its intent to revise Water Reclamation Requirements for this discharge and has provided them with an opportunity to submit their written views and recommendations.

The Regional Board, in a public meeting, heard and considered all comments pertaining to the discharge and to the updated requirements.

IT IS HEREBY ORDERED that the Independent Order of Foresters, Forester Haven, shall comply with the following:

A. EFFLUENT LIMITATIONS

1. Reclaimed water shall be limited to treated domestic and commercial wastewater only. No industrial wastes shall be discharged at this location.
2. ~~No water softener regeneration brines shall be discharged at this location after May 26, 1996.~~
3. Reclaimed water shall not contain constituents in excess of the following limits:

Effluent Limitations

<u>Constituent</u>	<u>Units</u>	<u>Maximum Effluent Limitations</u>
Total dissolved solids	mg/L	700
Chloride	mg/L	100
Sulfate	mg/L	300
Boron	mg/L	.15
BOD ₅ 20°C	mg/L	30
Suspended solids	mg/L	30
Total organic carbon	mg/L	20
Oil & grease	mg/L	15
Nitrate-N+nitrite-N+ ammonia-N	mg/L	10

4. Reclaimed water shall be at all times within the range of 6.5 to 8.5 pH units.
5. ~~Reclaimed water shall not contain heavy metals, arsenic, or cyanide in concentrations exceeding the limits contained in the current California Drinking Water Standards.~~
6. Any wastes that do not meet the foregoing limitations shall be held in impervious containers, and discharged at a legal point of disposal.

B. SPECIFICATIONS FOR USE OF RECLAIMED WATER

1. Reclaimed water used for landscape irrigation shall be at all times an adequately oxidized and disinfected wastewater.

An oxidized wastewater means wastewater in which the organic matter has been stabilized, is nonputrescible, and contains dissolved oxygen. For the purpose of these requirements, an oxidized wastewater shall be equivalent to secondary effluent with the following characteristics:

- (a) a biochemical oxygen demand (BOD₅20°C) value of less than 30 mg/L;
- (b) a suspended solids (SS) content of less than 30 mg/L; and
- (c) a total organic carbon (TOC) value of less than 20 mg/L.

The wastewater shall be considered adequately disinfected if the 7-day median number of coliform organisms in the effluent does not exceed 2.2 per 100 milliliters, as determined from the bacteriological results of the last 7-days for

which analyses have been completed, and the number of coliform organisms does not exceed 23 per 100 milliliters in more than one sample in any 30-day period.

2. Reclaimed water shall not be directly used for purposes other than those defined above until requirements for these uses have been established by this Regional Board, in accordance with Section 13523 of the California Water Code, unless the Regional Board finds that the above cited standards are applicable to these uses.
3. Reclaimed water uses shall meet the requirements in "Guidelines for Distribution of Nonpotable Water" specified in the State Department of Health Services guidelines for the preparation of an engineering report on production, and use of reclaimed water (Appendix B).
4. Reclaimed water used for irrigation shall be retained on the areas of use and shall not be allowed to escape as surface flow, except as provided for in a National Pollutant Discharge Elimination System (NPDES) Permit.

For the purpose of this requirement, however, minor amounts of irrigation return water from peripheral areas shall not be considered a violation of this Order.

5. Reclaimed water shall be applied at such a rate and volume as not to exceed vegetative demand and soil moisture conditions. Special precautions must be taken to prevent clogging of spray nozzles, to prevent over-watering, and to exclude the production of runoff. Pipelines shall be maintained so as to prevent leakage.
6. All areas where reclaimed water is used, and that are accessible to the public, shall be posted with conspicuous signs that include the following wording in a size no less than 4 inches high by 8 inches wide: "ATTENTION: NON-POTABLE RECLAIMED WATER - DO NOT DRINK" or "RECYCLED WATER - DO NOT DRINK." Each sign shall display the international symbol shown in Figure 2.

C. GENERAL REQUIREMENTS

1. Standby or emergency power facilities and/or sufficient capacity shall be provided for reclaimed water storage during rainfall or in the event of plant upsets or outages, and at times when irrigation cannot be practiced. Standby or emergency power facilities shall be installed and made operational by August 26, 1996.
2. Adequate facilities shall be provided to protect the sewage treatment and reclamation facilities from damage by storm flows and runoff.
3. Adequate freeboard shall be maintained in all storage ponds to ensure that direct rainfall will not cause overtopping.

4. Supervisors and operators of this Plant shall possess a certificate of appropriate grade as specified in Title 23, California Code of Regulations, Section 3680 or subsequent revisions.

D. PROHIBITIONS

1. The discharge of raw or inadequately treated sewage at any time is prohibited.
2. Reclaimed water shall not be used for irrigation during periods of extreme rainfall and/or runoff.
3. Reclaimed water use shall not result in earth movement in geologically unstable areas.
4. Reclaimed water shall not be used for irrigation or stored in any impoundment within 100 feet of any water well or mineral spring.
5. Neither treatment of waste, nor any reclaimed water use shall cause pollution or nuisance.
6. Water reclamation and reuse or disposal shall not result in problems due to breeding of mosquitoes, gnats, midges, or other pests.
7. Reclaimed water use or disposal shall not impart tastes, odors, color, foaming, or other objectionable characteristics to receiving groundwater.
8. Reclaimed water use or disposal, which could affect receiving groundwater, shall not contain any substance in concentrations toxic to human, animal, or plant life.
9. Odors of sewage origin shall not be perceivable beyond the limits of the property owned or controlled by the Reclaimer.
10. Raw sewage or partially dried waste sludge shall not be sprayed on the ground surface.
11. The discharge of reclaimed water at any point(s) other than specifically described in this Order is prohibited, and constitutes a violation of the Order.
12. The storage ponds shall not contain floating materials, including solids, liquids, foams, or scum, in concentrations that cause nuisance, adversely affect beneficial uses, or serve as a substrate for undesirable bacterial and algal growth and insect vectors.

E. PROVISIONS

1. A copy of this Order shall be maintained at the treatment and discharge facilities so as to be available at all times to operating personnel.
2. In accordance with Section 13522.5 of the California Water Code, and Section 60323 of the Wastewater Reclamation Criteria, the Reclaimer shall file an engineering report, prepared by a properly qualified engineer registered in California, of any material change or proposed change in character, location, or volume of the reclaimed water or its uses to the Regional Board and to the State Department of Health Services. State Department of Health Services guidelines (Appendix A) for the preparation of an engineering report on production, distribution, and use of reclaimed water should be followed.
3. The Reclaimer shall file with the Regional Board and the State Department of Health Services a report that specifies Cross Connection Control Protection as specified in section 3 of Appendix A.
4. In order to ensure that there is no potential cross connection hazard in the current distribution of the reclaimed water, a report shall be prepared, unless such a report is available, to address the Cross Connection Control Protection issues, and shall be submitted within 90 days of the adoption of this Order.
5. The Reclaimer shall file with the Regional Board technical reports on self-monitoring work performed according to the detailed specifications contained in the Monitoring and Reporting Program, as directed by the Executive Officer. The results of any monitoring done more frequently than required at the locations and/or times specified in the Monitoring and Reporting Program shall be reported to the Regional Board.
6. The Reclaimer shall notify this Regional Board, by telephone within 24 hours, of any violations of discharged or reclaimed water use conditions or any adverse conditions as a result of the use of reclaimed water from this facility; written confirmation shall follow within one week.
7. The Reclaimer shall notify the Regional Board staff, by telephone, immediately, of any confirmed coliform counts that could cause a violation of the Water Reclamation Requirements, including the date(s) thereof. This information shall be confirmed in the next monitoring report; in addition, for any actual coliform limit violations that occurred, the report shall also include the reasons for the high coliform results, the steps being taken to correct the problem (including dates thereof), and steps that have been taken to prevent a recurrence.

8. This Order does not alleviate the responsibility of the Reclaimer to obtain other necessary local, state, and federal permits to construct facilities necessary for compliance with this Order; nor does this Order prevent imposition of additional standards, requirements, or conditions by any other regulatory agency. Expansion of the facility from its current capacity shall be contingent upon issuance of all necessary permits, including a Conditional Use Permit.
9. For any extension or expansion of the reclaimed water distribution system, the Reclaimer shall submit a report detailing the extension or expansion for the approval of the Executive Officer and State Department of Health Services-Office of Drinking Water. Following construction, as-built drawings shall be submitted to the Executive Officer and State Department of Health Services-Office of Drinking Water for approval prior to use of reclaimed water.
10. The Reclaimer shall submit to the Regional Board, within 60 days of the adoption of this Order, procedures that will be, or have been, taken to ensure that no discharge or reclamation of any untreated sewage or partially treated sewage from the treatment facility, in the event of equipment failure, will result.
11. Any offsite disposal of sewage sludge shall be made only to a legal point of disposal, and in accordance with provisions of Division 7.5 of the California Water Code. For the purpose of these requirements, a legal point of disposal is defined as one for which Waste Discharge Requirements have been established by a California Regional Water Quality Control Board, and is in full compliance therewith. Any sewage or sludge handling shall be in a manner as to prevent its reaching surface waters or water courses.
12. After notice and opportunity for a hearing, this Order may be terminated or modified for cause, including, but not limited to:
 - (a) Violation of any term or condition contained in this Order;
 - (b) Obtaining this Order by misrepresentation, or failure to disclose all relevant facts;
 - (c) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.
13. The Reclaimer shall furnish, within a reasonable time, any information the Regional Board or the SDHS may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Reclaimer shall also furnish to the Regional Board, upon request, copies of any records required to be kept by this Order.

14. The Reclaimer shall take all reasonable steps to minimize or prevent any discharge that has a reasonable likelihood of adversely affecting human health or the environment.
15. Bypass (the intentional diversion of waste streams from any portion of a treatment facility) is prohibited. The Regional Board may take enforcement action against the Reclaimer for bypass unless:
 - (a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage. (Severe property damage means substantial physical damage to property, damage to the treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.);
 - (b) There were no feasible alternatives to bypass, such as the use of auxiliary treatment facilities, retention of untreated waste, or maintenance during normal periods of equipment down time. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that could occur during normal periods of equipment downtime or preventive maintenance; and
 - (c) The Reclaimer submitted a notice at least ten days in advance of the need for a bypass to the Regional Board.

The Reclaimer may allow a bypass to occur that does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to ensure efficient operation. In such a case, the above bypass conditions are not applicable.

16. The Reclaimer shall identify a responsible party to comply with this Order and the Monitoring and Reporting Program. This information shall be provided to the Regional Board within 30 days of receiving this Order.

Thereafter, the responsible party must notify the Regional Board, in writing, at least 30 days in advance of any proposed transfer of this Order's responsibility and coverage to a new Reclaimer. The notice must include a written agreement between the existing and new Reclaimer containing a specific date for the transfer of responsibility under this Order and compliance between the current and new Reclaimer.

The Independent Order of Foresters
(Forester Haven Wastewater Treatment Plant)
Order No. 96-014

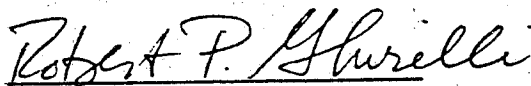
File No. 63-158

17. This Order includes "Standard Provisions Applicable to Waste Discharge Requirements." If there is any conflict between provisions stated herein and the "Standard Provisions Applicable to Waste Discharge Requirements," these provisions stated herein will prevail.

F. RESCISSION

Order No. 88-014, adopted by this Board on January 25, 1988, is hereby rescinded.

I, Robert P. Ghirelli, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on February 26, 1996.



ROBERT P. GHIRELLI, D.Env.
Executive Officer

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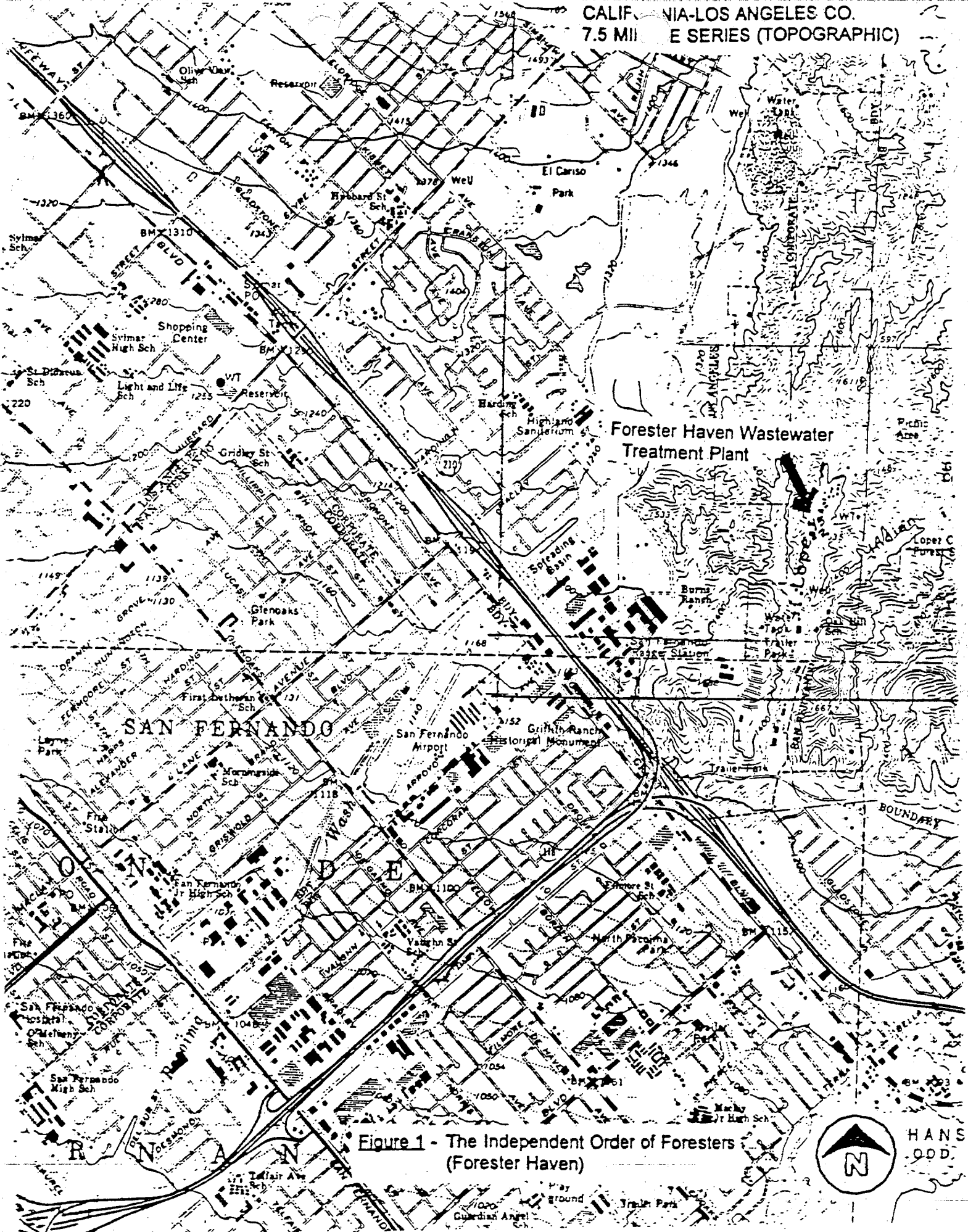


Figure 1 - The Independent Order of Foresters
(Forester Haven)

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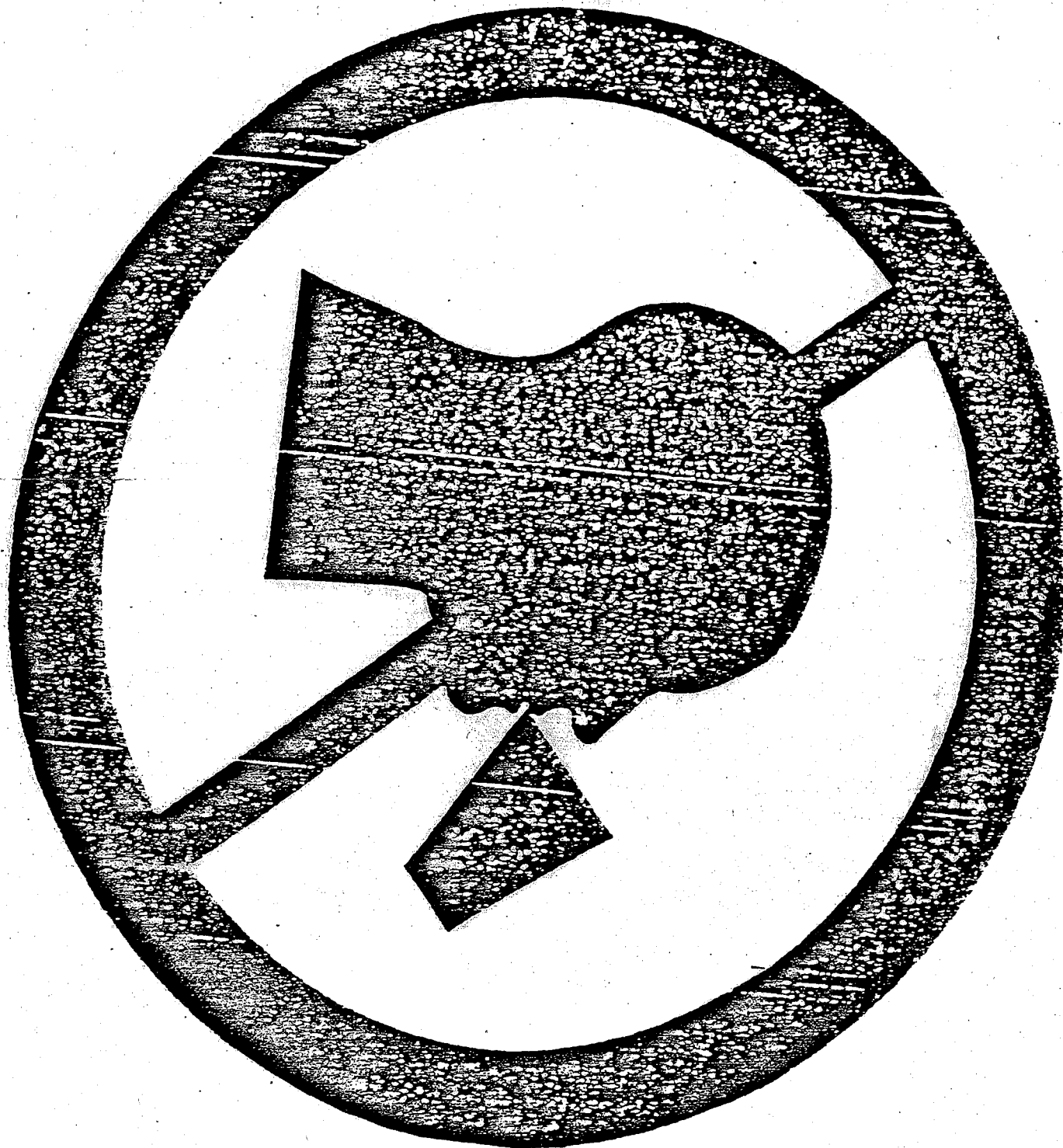


FIGURE 2

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. 4582
FOR
THE INDEPENDENT ORDER OF FORESTERS
(Forester Haven Wastewater Treatment Plant)
(Order No. 96-014)
(File No. 63-158)

The Independent Order of Foresters, Forester Haven (hereinafter Reclaimer), shall implement this monitoring program on the effective date of this Order.

Monitoring reports shall be submitted by the dates in the following schedule:

Reporting

<u>Reporting Period</u>	<u>Report Due</u>
January-March	April 30
April-June	July 30
July-September	October 30
October-December	January 30

The first monitoring report under this program shall be submitted by April 30, 1996.

By January 30th of each year, beginning in 1997, the Reclaimer shall submit an annual report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous year. In addition, the Reclaimer shall discuss the compliance record and the corrective actions taken, or planned, which may be needed to bring the discharge into full compliance with the Requirements.

Effluent Monitoring

A sampling station shall be established where representative samples of treated wastewater prior to reclamation can be obtained. Reclaimed water samples may be obtained at a single station provided that station is representative of the quality at all discharge points. Each sampling station shall be identified and approved by the Executive Officer prior to its use. The following shall constitute the reclaimed water Monitoring Program:

EFFLUENT MONITORING

<u>Constituents</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Minimum Frequency of Analysis</u>
Total waste flow ¹	gal/day	—	continuous
Coliform ²	MPN/100mL	grab	daily
pH	pH units	grab	weekly
BOD ₅ 20°C	mg/L	grab	monthly
Suspended solids	mg/L	grab	monthly
Total organic carbon	mg/L	grab	monthly
Settleable solids	mL/L	grab	monthly
Oil & grease	mg/L	grab	quarterly
Total dissolved solids	mg/L	grab	quarterly
Chloride	mg/L	grab	quarterly
Boron	mg/L	grab	quarterly
Sulfate	mg/L	grab	quarterly
Fluoride	mg/L	grab	quarterly
Nitrate-N	mg/L	grab	quarterly
Nitrite-N	mg/L	grab	quarterly
Ammonia nitrogen-N	mg/L	grab	quarterly
Water quality parameters and constituents scan ³	µg/L	grab	one-time analysis

¹ For those constituents that are continuously monitored, the Reclaimer shall report the minimum, maximum, and daily average values.
² Coliform samples shall be obtained at some point in the treatment process at a time when wastewater flow and characteristics are most demanding on the treatment facilities and disinfection processes. The location(s) of the sampling point(s) and any proposed changes thereto must be approved by the Executive Officer, and the proposed changes shall not be made until such approval has been granted. If the chosen sampling point(s) is/are not immediately located prior to discharge, subsequent to all treatment processes, an additional control sample of the final reclaimed water must be obtained and analyzed for coliform.
³ The second sample(s), if required, shall be obtained at the same time and frequency as the other required samples.
 Water quality parameters and constituents are listed in Appendix A. Results are to be submitted with the first annual report.

General Provisions for Sampling and Analysis

All chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services Environmental Laboratory Accreditation Program, or approved by the Executive Officer. Laboratory analyses must follow methods approved by the United States Environmental Protection Agency (EPA), and the laboratory must meet EPA Quality Assurance/Quality Control criteria. All analytical data must be presented on the enclosed Laboratory Report Forms. Analytical data reported as "less than" or below the detection limit for the purpose of reporting compliance with limitations, shall be reported

as "less than" a numerical value or "below the detection limit" for that particular analytical method (also giving the numerical detection limit).

Wastes Hauling Report

In the event that wastes are hauled to a disposal site, the name and address of the hauler of the waste shall be reported in each quarterly monitoring report, along with quantities hauled during the quarter, and the location of the final point of disposal. If no wastes are hauled during the reporting period, a statement to that effect shall be submitted in the quarterly monitoring report.

General Provisions for Reporting

For every item where the requirements are not met, the Reclaimer shall submit a statement of the actions undertaken, or proposed, which will bring the discharge into full compliance with requirements at the earliest time, and submit a timetable for correction.

In reporting the monitoring data, the Reclaimer shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with water reclamation requirements and, where applicable, shall include results of receiving water observations.

Please submit all analytical data in hardcopy and on 3 1/2" computer diskette. Submitted data must be IBM compatible, preferably using Lotus123 or dBase software, or in ASCII format.

The Reclaimer shall file a written report with this Regional Board describing the purposes for which reclaimed water from this facility is used, estimating quantities used for each type of use, depicting on a map or drawing the area(s) of use, and stating the name and address of each user of reclaimed water if other than the Reclaimer. This report shall be updated at least annually, and shall be included with the annual report due January 30th each year.

Each quarterly report shall include a statement that all reclaimed water was used only as specified in the requirements during the quarter.

If no water was delivered for reuse during the quarter, the report shall so state.

Each quarterly monitoring report shall include the method(s) of irrigation, application rates, crops irrigated during the quarter and the approximate acreage receiving reclaimed water.

Monitoring reports shall be signed and certified as follows:

- a. In the a case of corporation, by a principal Executive Officer of at least the level of vice-president;
- b. In the case of a partnership, by a general partner;
- c. In the case of a sole proprietorship, by the proprietor;

- d. In the case of municipal, state, federal, or other public agency, by either a principal Executive Officer or ranking elected official.

A duly authorized representative of a person designated above may sign documents if:

- a. The authorization is made in writing by a person described above;
- b. The authorization specifies either an individual or position having responsibility for the overall operation of the regulated facility or activity; and
- c. The written authorization is submitted to the Executive Officer of this Regional Board.

Each report shall contain the following completed declaration:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. [California Water Code Sections 13263, 13267, and 13268]

Executed on the ___ day of _____ at _____.

_____ Signature

_____ Title"

Operation and Maintenance Report

The Reclaimer shall file a technical report with this Regional Board, not later than 30 days after receipt of these Water Reclamation Requirements, relative to the operation and maintenance program for these discharge and reclamation facilities. The information to be contained in that report shall include, as a minimum, the following:

- a. The name and address of the person or company responsible for operation and maintenance of the facility.
- b. Type of maintenance (preventive or corrective).
- c. Frequency of maintenance, if preventive.

The Independent Order of Foresters
(Forester Haven Wastewater Treatment Plant)
Monitoring and Reporting Program No. 4582

Order No. 96-014

These records and reports are public documents and shall be made available for inspection during business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.



ROBERT P. GHIRELLI, D.Env.
Executive Officer

Date: February 26, 1996

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