

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

**ORDER 2000-161
WASTE DISCHARGE REQUIREMENTS
FOR CLOSURE AND POST-CLOSURE MAINTENANCE
FOR
COUNTY OF SAN DIEGO
OTAY CLASS I LANDFILL
SAN DIEGO COUNTY**

The California Regional Water Quality Control Board, San Diego Region (hereinafter Regional Board), finds that:

BACKGROUND

1. On May 20, 1974, this Regional Board adopted **Order No. 74-44, Waste Discharge Requirements for the County of San Diego Otay Disposal Site**. Order No. 74-44 established requirements for the disposal of wastes into three waste management units at the Otay Landfill. These included: 1) Class I unit for the discharge of hazardous wastes; 2) Class II-2 unit for the disposal of non-hazardous solid wastes; and 3) Class II-1 unit for the disposal of liquid industrial wastes mixed with non-hazardous solid wastes.
2. The Class I Landfill comprises 47.3 acres (Attachment 1 to this Addendum) and is located in the County of San Diego in portions of Section 17, T.18 S, Range 1 W, San Bernadino Base and Meridian (SBB&M) co-ordinate system. The County of San Diego estimates that 17,000,000 gallons of liquid hazardous wastes and 100,000 cubic yards of hazardous solid wastes such as asbestos, oil spill debris, sand and paint were discharged on this property from 1963 through October 1980.
3. Discharges of hazardous and non-hazardous wastes have ceased, and the Class I landfill has been inactive since November 1980.
4. On October 15, 1997 the Regional Board adopted Addendum No. 1 to Order 74-44 to detach the non-hazardous waste (Class II-1 and 2) units from the hazardous waste disposal area (Class I) at the Otay Landfill. The detached portion of the non-hazardous landfill was combined with the Otay Class III Landfill (Order 90-09) and sold to a private entity. The neighboring Class III portion of the Otay Landfill is currently owned and operated by San Diego Landfill systems, a division of Allied Waste.

5. Closure of the Class I Landfill will include the placement of burn ash and soil mixture as a foundation layer, overlain by three feet of additional low permeability soil. The burn ash will be transported to the Class I Landfill from three distinct sources: 1) Otay Class III Landfill (125,000 cubic yards (cy)); 2) San Ysidro Burn Site, County of San Diego (20,000 cy.); and 3) the Shinohara Site, Chula Vista (34,000 cy.).
6. On June 29, 2000 the County submitted a complete Report of Waste Discharge (ROWD) proposing the inclusion of burn ash and soil materials on the northern and southern embankments as foundation layer. Final soil cover will include three feet of low permeability soil compacted to a maximum hydraulic conductivity of 1×10^{-5} . The ROWD indicates a postclosure land use as non-irrigated open space.
7. This Order, supersedes Order 74-44 as amended which established Waste Discharge Requirements for the Otay Class I Landfill.

WATER QUALITY CONTROL PLAN

9. The **Water Quality Control Plan Report, San Diego Basin (9)** (hereinafter Basin Plan), was adopted by this Regional Board on September 8, 1994, and subsequently approved by the State Water Resources Control Board (State Board) on December 13, 1994. Subsequent revisions to the Basin Plan have also been adopted by the Regional Board and approved by the State Board. The Basin Plan designates beneficial uses and narrative and numerical water quality objectives, and prohibitions, which are applicable to the discharges regulated under this Order.
10. The Otay Class I Landfill is located within the Otay Hydrologic Area Boundary (910.20) of the Otay Hydrologic Unit. The landfill is located in the county of San Diego, surrounded by the City of Chula Vista and the Otay Class III Landfill. It is situated on the north side of Otay Valley Road approximately one mile east of Interstate 805.
11. The Basin Plan establishes the following beneficial uses for the waters of the Otay Hydrologic Area (910.20) of the Otay Hydrologic Unit:

a. Inland Surface Waters

1. Municipal **
2. Agricultural Supply
3. Industrial *

b. Groundwater

1. Municipal **
2. Industrial Service Supply
3. Contact water recreation
4. Non-contact water recreation
5. Warm Fresh Water Habitat

Note * Potential Beneficial Use

** Excepted from Municipal use

12. The Basin Plan established the following water quality objectives for water of the Otay Hydrologic Area (10.20):

Constituent	Surface Water	Ground Water ²
<i>Total Dissolved Solids</i>	1000 mg/l	--
<i>Chloride</i>	400 mg/l	--
<i>Percent Sodium</i>	60%	--
<i>Sulfate</i>	500 mg/l	--
<i>Nitrate (as NO₃)</i>	---	--
<i>Nitrogen & Phosphorus</i>	---	---
<i>Iron</i>	0.3 mg/l	--
<i>Manganese</i>	0.05 mg/l	--
<i>Methylene Blue Active Substances</i>	0.5 mg/l	--
<i>Boron</i>	0.75 mg/l	--
<i>Dissolved Oxygen</i>	---	---
<i>Odor</i>	None	--
<i>Turbidity</i>	20 NTU	--
<i>Color</i>	20 Units	--
<i>Fluoride</i>	1.0 mg/l	--

The above concentrations not to be exceeded more than 10% of the time.

Note: mg/l = milligrams per liter
Nephelometric Turbidity Units

NTU =

- Concentrations of nitrogen and phosphorus, by themselves or in combinations with other nutrients, shall be maintained at levels below those which stimulate algae and emergent plant growth. Threshold total Phosphorus (P) concentrations shall not exceed 0.05 mg/L in any stream at the point where it enters any standing body of water, nor 0.025 mg/L in any standing body of water. A desired goal in order to prevent plant nuisances in streams and other flowing waters appears to be 0.1 mg/L total P. These values are not to be exceeded more than 10 percent of the time unless studies of the specific water body in question clearly show that water quality objective changes are permissible and changes are approved by the Regional Board. Analogous threshold values have not been set for nitrogen compounds; however, natural ratios of nitrogen to phosphorus are to be determined by surveillance and monitoring and upheld. If data are lacking, a ratio of N:P = 10:1 shall be used.
- The water quality objectives apply to the portion of the Otay HA 10.20 limited to lands within and tributary to Salt Creek on the east and Poggi Canyon on the west and including several smaller drainage courses between these tributaries of the Otay River.

CEQA AND OTHER LEGAL REFERENCES

13. This Order implements:
 - a) Water Quality Control Plan, San Diego Basin – Region 9;
 - b) Prescriptive standards and performance goals of Chapter 15, Title 23, California Code of Regulations, effective July 18, 1997, and subsequent revisions;
14. In June 2000 the County of San Diego filed a Notice of Exemption stating that the project is categorically exempt in accordance with Section 15301(b) of the California Environmental Quality Act.
15. The Otay Class I Landfill is an existing facility and as such is exempt from the provisions of the California Environmental Quality Act in accordance with Title 14, California Code of Regulations (CCR), Chapter 3, Article 19, Section 15301.
16. The Regional Board, in establishing the requirements contained herein, considered factors including, but not limited to the following:
 - a. Past, present, and probable future beneficial uses of water.
 - b. Environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto.
 - c. Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area.
 - d. Economic considerations.
 - e. The need for developing housing within the region.
 - f. The need to develop and use recycled water.
 - g. Beneficial uses to be protected and water quality objectives reasonably required for that purpose.
 - h. Other waste discharges.
 - i. The need to prevent nuisance.
17. The Regional Board has considered all water resource related environmental factors associated with the Otay Class I Landfill.
18. The Regional Board has notified interested agencies and all known interested parties of its intent to issue post-closure maintenance requirements for this inactive landfill.
19. The Regional Board in a public meeting heard and considered all comments pertaining to post-closure maintenance of this inactive landfill.

IT IS HEREBY ORDERED, that the County of San Diego, (hereinafter discharger) shall comply with the following:

A. CLOSURE SPECIFICATIONS

1. Closure and Post-Closure Maintenance of the Otay Class I Landfill shall be conducted in accordance with the revised Report of Waste Discharge dated June 28, 2000.
2. Construction for the final cover shall be carried out in accordance with a construction quality assurance (CQA) plan certified by an appropriately registered professional to satisfy the requirements of 27 CCR Section 20324.
3. Burn ash and soil materials shall be placed on the northern and southern embankments as a foundation layer and these materials shall be covered with an additional three feet of low permeability soil compacted with a maximum hydraulic conductivity of 1×10^{-5} in accordance with the Report of Waste Discharge.
4. The low permeability soil shall be compacted to a minimum of 90 percent of the maximum dry density as determined by ASTM D 1557.

B. POST-CLOSURE MAINTENANCE SPECIFICATIONS

GENERAL MAINTENANCE REQUIREMENTS

1. The discharger shall prepare a maintenance plan by January 1, 2001, which contains, but is not limited to, the following:
 - a. The persons, companies, or agencies responsible for each aspect of landfill maintenance, along with their addresses and phone numbers.
 - b. Location maps indicating property boundaries and the existing limits of waste, internal roads, and structures inside the property boundary.
 - c. A location map of the current monitoring and control systems including drainage and erosion control systems and landfill gas monitoring and control systems.
 - d. A description of the methods, procedures, schedules and processes that will be used to maintain, monitor and inspect the landfill.
2. The landfill maintenance period shall continue until the Regional Board determines that remaining wastes in all waste management units (WMUs) will not threaten water quality.
3. The discharger shall comply with all applicable requirements of Title 27, CCR, Subchapter 5, Article 2.
4. The landfilled areas shall be adequately protected from any washout, erosion of wastes or cover material. The surface drainage system shall be designed to adequately handle the rainfall from a 100-year 24 hour storm event.

5. The structural integrity and effectiveness of all containment structures and the existing cover shall be maintained as necessary to correct the effects of settlement or other adverse factors. Vegetation used at the site shall be selected to require minimum irrigation and maintenance, and shall not impair the integrity of containment structures including the existing cover.
6. The migration of landfill gas from the site shall be controlled as necessary, to ensure that landfill gases and gas condensate is not discharged to surface waters or ground waters. Condensate shall be collected and removed from the site except as defined in Title 27 CCR Section 20090(e).

EROSION CONTROL

7. Annually, prior to the anticipated rainy season but not later than October 31, any necessary erosion control measures shall be implemented, and any necessary construction, maintenance, or repairs of precipitation and drainage control facilities shall be completed to prevent erosion, ponding, flooding, or to prevent surface drainage from contacting or percolating through wastes at the facility. In addition, maintenance and repairs necessitated by changing site conditions can be made at any time.
8. Silt fences, hay bales, and other measures shall be used to control surface water runoff from landfill areas where the landfill cover has been placed, and from areas where the landfill containment system construction is occurring.
9. All areas, including surface drainage courses, shall be maintained to minimize erosion. The landfill cover shall be maintained to minimize percolation of liquids through wastes.

SURFACE DRAINAGE

10. Surface water runoff within the boundary of the landfill (i.e., precipitation that falls on the landfill cover) shall be collected by a system of berms, ditches, downchutes, swales and drainage channels, and shall be diverted off the landfill to either the detention basins or to the natural watercourses offsite.
11. Surface drainage from tributary areas and internal site drainage from surface and subsurface sources shall not contact or percolate through waste and shall either be contained onsite or be discharged in accordance with applicable storm water regulations.
12. Surface drainage from the landfill is subject to State Board Order No. 97-03-DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000001, "Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities".
13. Where flow concentrations result in erosive flow velocities, surface protection such as asphalt, concrete, riprap, silt fences or other erosion control material shall be used for

protection of drainage conveyance features. Interim bench ditches shall be provided with erosion control material and riprap to control erosion where necessary.

14. Where high velocities occur at terminal ends of downchutes or where downchutes cross the landfill cover access roads, erosion control material shall be applied to exposed soil surfaces.
15. Energy dissipators shall be installed to control erosion at locations where relatively high erosive flow velocities are anticipated.

IRRIGATION SYSTEMS CONTROL

16. For inactive landfills with water lines overlying waste, the design shall consider, but not be limited to, the following:
 - a. Flexible connectors;
 - b. Secondary containment;
 - c. Moisture sensors within secondary containment;
 - d. Rain sensors;
 - e. Annual leak testing;
 - f. Automatic shutoff valves; and
 - g. Maintenance plan describing the inspection and maintenance schedule for all mitigation devices.

FINANCIAL ASSURANCE

17. The discharger shall maintain assurances of financial responsibility for initiating and completing corrective action for all known and reasonably foreseeable releases from the landfill pursuant to CCR Title 27, Chapter 6, Article 4, Section 22222.
18. The discharger shall maintain an irrevocable closure fund to ensure adequate post-closure maintenance of the landfill, with the Regional Board named as the beneficiary, pursuant to CCR Title 23, Chapter 15, Section 2580 (f).
19. The discharger shall submit a status report regarding the financial assurances for corrective action and closure every five years after the date of adoption of these requirements that either validates the ongoing viability of the financial instruments or proposes and substantiates any needed changes.

C. PROHIBITIONS

1. Discharges of wastes to lands which have not been specifically described to the Regional Board and for which valid Waste Discharge Requirements are not in force are prohibited.
2. The discharge of waste shall not:
 - a. Cause the occurrence of coliform or pathogenic organisms in waters pumped from the basin;
 - b. Cause the occurrence of objectionable tastes and odors in waters pumped from the basin;
 - c. Cause waters pumped from the basin to foam;
 - d. Cause the presence of toxic materials in waters pumped from the basin;
 - e. Cause the pH of waters pumped from the basin to fall below 6.0 or rise above 9.0;
 - f. Cause this Regional Board's objectives for the ground or surface waters as established in the Basin Plan, to be exceeded; and
 - g. Cause pollution, contamination or nuisance or adversely affect beneficial uses of the ground or surface waters as established in the Basin Plan.
3. Odors, vectors, and other nuisances of waste origin beyond the limits of the landfill site are prohibited.
4. The discharge of waste to surface drainage courses or to usable ground water is prohibited.
5. Basin Plan prohibitions shall not be violated.
6. The use of pressurized water lines overlying waste is prohibited unless the water lines are designed in accordance with Maintenance Specification B. 16.

D. PROVISIONS**1. GENERAL PROVISION**

Neither the treatment nor the discharge of waste shall create a pollution, contamination, or nuisance, as defined by Section 13050 of the California Water Code.

2. DUTY TO COMPLY

The discharger shall comply with all conditions of this Order and any additional conditions prescribed by the Regional Board in addenda thereto. Any noncompliance with this Order constitutes a violation of the California Water Code and is grounds for: (a) enforcement action; (b) termination, revocation and reissuance, or modification of this Order; or (c) denial of a Report of Waste Discharge in application for new or revised Waste Discharge Requirements.

3. COMPLIANCE

In an enforcement action, it shall not be a defense for the discharger to say, it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this Order.

4. CORRECTIVE ACTION

The discharger shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this Order, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the noncompliance.

5. PROPER OPERATION AND MAINTENANCE

The discharger shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the discharger to achieve compliance with conditions of this Order. Proper operation and maintenance includes effective performance, adequate laboratory and process controls including appropriate quality assurance procedures.

6. PERMIT REVISION

This Order may be modified, revoked and reissued, or terminated for cause including, but not limited to, the following:

- a. Violation of any terms or conditions of this Order;
- b. Obtaining this Order by misrepresentation or failure to disclose fully all relevant facts; or
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

The filing of a request by the discharger for the modification, revocation and reissuance, or termination of this Order, or notification of planned changes or anticipated noncompliance does not stay any condition of this Order.

7. CHANGE IN OWNERSHIP

This Order is not transferable to any person except after notice to the Executive Officer. The Regional Board may require modification or revocation and reissuance of this Order to, change the name of the discharger and incorporate such other requirements as may be necessary under the California Water Code. The discharger shall submit notice of any proposed transfer of this Order's responsibility and coverage as described under Reporting Requirement E.3.

8. PROPERTY RIGHTS

This Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, nor protect the discharger from liability under federal, state, or local laws, nor create a vested right for the owner and operator to continue the regulated activity.

9. ENTRY AND INSPECTION

The discharger shall allow the Regional Board, or an authorized representative upon the presentation of credentials and other documents as may be required by law to:

- a. Enter upon the discharger premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
- d. Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order or as otherwise authorized by the California Water Code, any substances or parameters at any location.

10. PERMIT REPOSITORY

A copy of this Order shall be maintained at the local offices of the discharger and shall be available to operating personnel at all times.

11. SEVERABILITY

The provisions of this Order are severable, and if any provision of this Order, or the application of any provision of this Order to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Order, shall not be affected thereby.

12. EFFECTIVE DATE

This Order becomes effective on the date of adoption by the Regional Board. This Order supersedes Order Nos. 74-44 and subsequent addenda.

E. REPORTING REQUIREMENTS**1. CHANGE IN DISCHARGE**

The discharger shall file the following reports in accordance with the following schedule:

a. Report of Waste Discharge

The discharger shall file a new Report of Waste Discharge at least 120 days prior to the following:

- 1) Significant change in post-closure maintenance activities which would significantly alter existing drainage patterns and slope configurations, or pose a potential threat to the integrity of the site;
- 2) Change in land use other than as described in the findings of this Order;
- 3) Significant change in disposal area, e.g. excavation and relocation of waste on site; or
- 4) Any planned change in the regulated facility or activity which may result in noncompliance with this Order.

b. Workplan

The discharger shall submit a workplan at least 30 days prior to any maintenance activities that could alter existing surface drainage patterns or change existing slope configurations. These activities may include, but not be limited to, significant grading activities, the importation of fill material, the design and installation of soil borings, ground water monitoring wells and other devices for site investigation purposes.

c. Written Notification

The discharger shall provide written notification at least 2 working days prior to any maintenance activities that are minor and/or routine in nature, do not add a significant amount of water, do not inhibit drainage, have limited potential for impacts to beneficial use of water, and will not interfere with future routine maintenance. These activities may include, but not be limited to:

- 1) Routine maintenance grading and dust control;
- 2) Landscaping with minimal/no water application;
- 3) Gas surveys with temporary probes; or
- 4) Replacement/removal of gas collection wells.

2. GENERAL REPORTING REQUIREMENT

The discharger shall furnish to the Regional Board, within a reasonable time, any information which the Regional Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The discharger shall also furnish to the Regional Board upon request, copies of records required to be kept by this Order.

3. CHANGE IN OWNERSHIP

The discharger shall notify the Regional Board, in writing, at least 120 days in advance of any proposed transfer of this Order's responsibility and coverage between the current owner and new owner for construction, operation, closure, or post-closure maintenance of a landfill. This agreement shall include an acknowledgement that the existing owner is liable for violations up to the transfer date and that the new owner is liable from the transfer date on. The agreement shall include an acknowledgement that the new owners shall accept responsibility for compliance with this Order which includes the post-closure maintenance of the landfill.

4. INCOMPLETE REPORTS

Where the discharger becomes aware that it failed to submit any relevant facts in a Report of Waste Discharge or submitted incorrect information in a Report of Waste Discharge or in any report to the Regional Board, it shall promptly submit such facts or information.

5. ENDANGERMENT OF HEALTH AND ENVIRONMENT

The discharger shall report any noncompliance which may endanger health or the environment. Any such information shall be provided verbally to the Regional Board within 24 hours from the time the owner becomes aware of the circumstances. A written submission shall also be provided within five days of the time the owner becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected; the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate, or prevent recurrence of the noncompliance. The Regional Board, or an authorized representative, may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

6. SLOPE FAILURE

The discharger shall notify the Regional Board immediately of any slope failure occurring in a waste management unit. Any failure which threatens the integrity of the containment features or the waste management unit shall be promptly corrected after approval of the method and schedule by the Regional Board.

7. LANDFILL GAS

The discharger shall operate and maintain a landfill gas migration control and detection system as required by the Air Pollution Control District (APCD) and the Local Enforcement Agency (LEA).

8. MONITORING AND REPORTING PROGRAM

The discharger shall comply with the attached Monitoring and Reporting Program No. 2000-161. Monitoring results shall be reported at the intervals specified in Monitoring and Reporting Program No. 2000-161.

9. REPORT DECLARATION

All applications, reports, or information submitted to the Regional Board shall be signed and certified as follows:

a. The Report of Waste Discharge shall be signed as follows:

1. For a corporation - by a principal executive officer of at least the level of vice-president.
2. For a partnership or sole proprietorship - by a general partner or the proprietor, respectively.
3. For a municipality, state, federal or other public agency - by either a principal executive officer or ranking elected official.
4. For a military installation - by the base commander or the person with overall responsibility for environmental matters in that branch of the military.

b. All other reports required by this Order and other information required by the Regional Board shall be signed by a person designated in paragraph (a) of this provision, or by a duly authorized representative of that person. An individual is a duly authorized representative only if:

1. The authorization is made in writing by a person described in paragraph (a) of this provision;

2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity; and
 3. The written authorization is submitted to the Regional Board.
- c. Any person signing a document under this Section shall make the following certification:

" 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."

10. REGIONAL BOARD ADDRESS

The discharger shall submit reports required under this Order and other information requested by the Regional Board, to:

Land Discharge Unit
California Regional Water Quality Control Board
San Diego Region
9771 Clairemont Mesa Blvd., Suite A
San Diego, California 92124-1331

F. NOTIFICATIONS

1. U.S. EPA REVIEW

These requirements have not been officially reviewed by the United States Environmental Protection Agency and are not issued pursuant to Section 402 of the Clean Water Act.

2. CIVIL MONETARY REMEDIES

The California Water Code provides that any person who intentionally or negligently violates any Waste Discharge Requirements issued, reissued, or amended by this Regional Board is subject to administrative civil liability of up to 10 dollars per gallon of waste discharged, or if no discharge occurs, up to 1000 dollars per day of violation. The Superior Court may impose civil liability of up to 10,000 dollars per day of violation or, if a cleanup and abatement order has been issued, up to 15,000 dollars per day of violation.

3. PENALTIES FOR INVESTIGATION, MONITORING OR INSPECTION VIOLATIONS

3. PENALTIES FOR INVESTIGATION, MONITORING OR INSPECTION VIOLATIONS

The California Water Code provides that any person failing or refusing to furnish technical or monitoring program reports, as required under this Order, or falsifying any information provided in the monitoring reports is guilty of a misdemeanor and may be subject to administrative civil liability of up to 1000 dollars per day of violation.

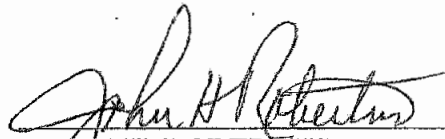
4. OTHER CLOSURE REGULATIONS

Closure of this waste management unit may be subject to regulations of the California Integrated Management Board and the San Diego County Air Pollution Control District.

5. CHAPTER 15 DEFINITIONS

Definitions of terms used in this Order shall be as set forth in California Code of Regulations Chapter 15.

I, John H. Robertus, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Diego Region, on August 30, 2000.



JOHN H. ROBERTUS
California Regional Water Quality Control Board
Executive Officer
August 30, 2000