KCB

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

In the Matter of the Petition of **BONNIE HEIMBECHER, ROBERT B. ISAACSON, VIRGIL J. JOSE, CAROL MAUCERI, JEFFREY K. YANN, & RR&C DEVELOPMENT COMPANY** For Review of Waste Discharge Requirements Order No. 93-070 (Puente Hills Landfill Expansion) Issued by the California Regional Water Quality Control Board, Los Angeles Region. Our File No. A-884.	ORDER NO. WQ 96-10

BY THE BOARD:

On November 1, 1993, the California Regional Water Quality Control Board, Los Angeles Region (LARWQCB), adopted Waste Discharge Requirements Order No. 93-070 (hereinafter "Order No. 93-070") for the expansion of the Puente Hills Landfill (hereinafter "landfill"). Bonnie Heimbecher, Robert B. Isaacson, Virgil J. Jose, Carol Mauceri, Jeffrey K. Yann, and RR&C Development Company (hereinafter "petitioners") filed a timely petition with the State Water Resources Control Board (SWRCB) for review of Order No. 93-070. This petition was held in abeyance during the pendency of a lawsuit filed by petitioners challenging the adequacy of the environmental impact report prepared for the landfill expansion. At the conclusion of that lawsuit, the LARWQCB, on October 3, 1994, amended Order No. 93-070 in Waste Discharge Requirements Order No. 94-103 (hereinafter "Order

No. 94-103"). Subsequently, the petitioners reinstated and supplemented their petition to also seek review of Order No. 94-103. The petition was determined to be complete as of March 7, 1995. The petitioners' primary contentions concern the adequacy of containment and ground water monitoring requirements at the landfill, the LARWQCB's response to releases from the landfill and the potential for migration of wastes into adjacent ground water basins, and compliance with the California Environmental Quality Act (CEQA).

I. BACKGROUND

The Puente Hills Landfill is a Class III landfill located on a 1365-acre unincorporated area of Los Angeles County, east of the San Gabriel River Freeway and south of the Pomona Freeway. It is currently operated by the County Sanitation Districts of Los Angeles County (hereinafter "Sanitation Districts" or "discharger") and has been in operation since 1957. It has received municipal solid waste, household wastes, non-hazardous industrial waste, digested dewatered sludge from a water pollution control plant, limited quantities of liquid waste until July 1, 1988, and treated incinerator ash. Currently, the landfill receives up to 13,200 tons of waste per day and approximately 72,000 tons of waste per week. The landfill consists of an approximately 700-acre area referred to in this Order as the "existing landfill" and a proposed new 100-acre area of the landfill referred to in this Order as the "Eastern Canyons

lateral expansion." The existing landfill includes the unlined "Main Canyon" where waste disposal is planned to continue in a vertical expansion and the lined "Canyon 9" where incinerator ash disposal takes place. The Canyon 9 area also has a leachate collection and removal system (LCRS). The lateral expansion is also designed to have a composite liner and an LCRS.

The landfill is in the Puente Hills area of the Santa Ana Mountains and is bounded to the north by the San Gabriel Ground Water Basin, to the east by the San Jose Creek Ground Water Subbasin, to the west by the Whittier Narrows and the San Gabriel River areas, and to the southwest by the Central Ground Water Basin. The geology and hydrogeology of the landfill site are quite complex and contain varying lithologic units and structural elements.[1] There is a potential for ground water from the landfill site to flow into the adjacent San Gabriel Ground Water Basin and San Jose Creek Subbasin. Ground water at the landfill site flows in three different directions. The discharger has installed four subsurface barriers at several canyons of the existing landfill to block ground water flow from the canyons offsite; three of them are cement-bentonite subsurface barriers and one is a clay barrier. Barriers 1 and 3

---

[1] *The landfill has been the subject of numerous studies and reports which are a part of the administrative record for this petition. The record includes information presented at the February 7, 1996, Workshop "Technical Review of the Puente Hills Landfill Petition" from Harry M. Schueller, Chief, Division of Clean Water Programs, State Water Resources Control Board to Craig M. Wilson, Assistant Chief Counsel, State Water Resources Control Board (September 15, 1995) (hereinafter "SWRCB Technical Report").*

are in the unlined Main Canyon portion of the existing landfill, and the clay barrier is located upgradient of Barrier 3. Barrier 2 is in the lined Canyon 9 area of the existing landfill. The discharger intends to install two cement-bentonite subsurface barriers at the Eastern Canyons lateral expansion.

Waste Discharge Requirements Order No. 90-046, amended by Order No. 91-035 and Order No. 93-062, governs the existing landfill.[2] Order Nos. 93-070 and 94-103 govern the proposed vertical expansions of the existing landfill and the proposed Eastern Canyons lateral expansion. Order Nos. 93-070 and 94-103 and the associated monitoring and reporting program are the subject of the petition. The proposed vertical expansion, however, is located in the area of the existing landfill, governed by Order Nos. 90-046, 91-035, and 93-062 and the associated Monitoring and Reporting Program. This Order will address those waste discharge requirements where necessary.

The government approvals of the vertical and lateral expansions are subject to California Environmental Quality Act

---

[2] *The LARWQCB has been regulating the Puente Hills Landfill since 1959 through resolutions, waste discharge requirements, and monitoring and reporting orders. In 1959, the LARWQCB adopted Resolution No. 59-034, which was amended in 1972 to incorporate the new regulations (Title 23, California Code of Regulations (CCR), Subchapter 15), as appropriate. In 1989, the LARWQCB adopted Waste Discharge Requirements Order No. 89-032 for the existing landfill to incorporate revisions to the regulations (recodified as Chapter 15) which was revised in Waste Discharge Requirements Order No. 90-046. Waste Discharge Requirements Order Nos. 91-035 and 92-020 amended Order No. 90-046 to address incinerator ash disposal. Waste Discharge Requirements Order No. 93-062 incorporated federal Subtitle D requirements. Associated monitoring and reporting programs were revised to implement amended waste discharge requirements. The LARWQCB adopted Waste Discharge Requirements Order No. 93-070 for the proposed vertical and lateral expansion, which were amended by Waste Discharge Requirements Order No. 94-103 regarding CEQA compliance.*

(CEQA). On November 25, 1992, the Sanitation Districts, which are the lead agency for purposes of CEQA, certified the Final Environmental Impact Report (EIR) for the lateral and vertical expansions of the landfill and approved the projects. On July 20, 1993, the Los Angeles County Board of Supervisors issued a conditional use permit for the lateral and vertical expansions. The EIR was challenged in court by the petitioners and others.[3] On September 14 and 28, 1993, the court found that the Sanitation Districts had violated CEQA and ordered them to supplement a portion of the EIR addressing water quality issues. On November 1, 1993, the LARWQCB, which is a responsible agency for purposes of CEQA, adopted Order No. 93-070, relying on the Final EIR. Subsequently, the Sanitation Districts prepared a supplemental EIR. In a final judgement and order, the court determined that the Supplemental EIR was adequate and that the Sanitation Districts had complied with CEQA by addressing water quality issues and providing appropriate mitigation.[4] Following the court's order, the LARWQCB amended Order No. 93-070 by adopting Order No. 94-103 containing additional CEQA findings.

---

[3] *Two lawsuits were filed challenging the conditional use permits and the EIR and were consolidated as Hacienda La Puente Unified School District, et al. v. County Sanitation District No. 2, et al., Los Angeles Superior Court, BS022186 c/w BC071648. The lawsuit also addressed a materials recovery and rail loading facility that are not at issue in the petition before the SWRCB.*

[4] *Hacienda La Puente Unified School District, et al. v. County Sanitation District No. 2 of Los Angeles County, et al., Los Angeles County Superior Court, BS022186 c/w BC071648 (June 20, 1994).*

The landfill is subject to the Porter-Cologne Water Quality Control Act, SWRCB policies and regulations (including Title 23, California Code of Regulations, Division 3, Chapter 15 [the waste disposal to land regulations] [hereinafter "Chapter 15"]), and the federal Resource Conservation and Recovery Act Subtitle D regulations found in 40 Code of Federal Regulations (CFR), Part 258 (hereinafter "Subtitle D regulations"), which govern municipal solid waste landfills, as well as other state requirements not relevant to this petition. In 1993 the SWRCB adopted Resolution No. 93-62 (Policy for Regulation of Discharge of Municipal Solid Waste), which requires RWQCBs to update waste discharge requirements for landfills to incorporate the Subtitle D requirements. Waste discharge requirements for landfills are required to include standards specified in Resolution No. 93-62 and may include region-specific standards to comply with Water Quality Control Plans and to address site-specific water quality issues. During the life of this landfill, significant changes have occurred in the regulatory system that applies to the landfill. Waste discharge requirements adopted by the LARWQCB have changed over time to incorporate changes in the regulations. Under the current regulatory system, the entire landfill is subject to Subtitle D monitoring, closure, and siting requirements, but composite liner design requirements of Subtitle D apply only to the lateral expansion.

///

II. CONTENTIONS AND FINDINGS

The petitioners contend that the LARWQCB's actions violated CEQA, the Porter-Cologne Water Quality Control Act, and Chapter 15.[5] Petitioners' major contentions can be summarized as follows:

1. That the monitoring requirements are inadequate.

2. That the liner requirements for Eastern Canyons lateral expansion are inadequate.

3. That the effectiveness of the subsurface barriers as containment features was not adequately addressed.

4. That characterization of background water quality was inadequate.

5. That the LARWQCB has not adequately responded to evidence of releases from the landfill.

6. That the LARWQCB did not comply with CEQA.

Each of the contentions will be addressed below.[6]

1. Contention: The petitioners contend that the waste discharge requirements are inadequate with respect to water quality monitoring for both the lateral expansion and the existing landfill. Specifically, the petitioners contend that the detection monitoring requirements are not adequate to detect

---

[5] *The petitioners rely on reports prepared by Stetson Engineers, Inc., engineers for the Main San Gabriel Basin Watermaster, which addressed water quality issues related to the landfill. The "Stetson Report" was evaluated as part of the administrative record for this petition.*

[6] *Other contentions raised by petitioners are denied for failure to raise substantial issues. 23 CCR Section 2052(a)(i); People v. Barry, 194 Cal.App.3d 158, 239 Cal.Rptr. 349 (1987).*

potential releases from the landfill, including migration offsite through bedrock pathways. They also contend that the discharger's compliance with and the LARWQCB's enforcement of requirements is inadequate.

Findings: The SWRCB agrees, in part, with this contention. Water quality monitoring requirements for both the existing landfill and the lateral expansion are required to comply with both Chapter 15 and Subtitle D detection monitoring requirements. Chapter 15, Article 5 requires a detection monitoring program to ensure the earliest possible detection of a release from a waste management unit into surface water, the vadoze zone, or the saturated zone of the uppermost aquifer.

The detection monitoring requirements specified in the waste discharge requirements and associated monitoring programs for both the existing landfill and the lateral expansion include the minimum requirements contained in the applicable state and federal regulations. Attached to Order Nos. 90-046, 93-062, and 93-070 are "Standard Provisions" that contain the SWRCB-specified requirements in accordance with SWRCB Resolution No. 93-62. In addition to the more general requirements from Resolution No. 93-62, individual waste discharge requirements should include site-specific requirements where necessary. For this landfill, the detection monitoring requirements may not be specific enough to address fully the complex geologic and hydrogeologic features of the landfill site. As described above, the landfill has three

main portions. Any liquids escaping these portions could flow in three different directions. Monitoring requirements in Order No. 90-046 for the existing landfill and Order No. 93-070 for the vertical and lateral expansions do not adequately distinguish between the three portions of the landfill and should be revised to specifically address appropriate detection monitoring requirements for each portion.

In addition, several provisions of Order Nos. 90-046 and 93-070 directly conflict with the Standard Provisions. Those Standard Provisions state that comparisons of samples from background and downgradient wells with respect to monitoring parameters must involve a statistical method selected in accordance with an analysis of concurrent background concentrations. However, Section C of Order No. 90-046 sets forth a different method of analysis. It sets forth concentration values based on prediction intervals using one-time background concentration values. Further, in Section C.4. of Order No. 90-046, the discharger is given the discretion to select a statistical method for comparison of monitoring parameter and constituent of concern concentrations based on an earlier version of Chapter 15 that has been revised. Section C.4. is in conflict with Subtitle D requirements as specified in the Standard Provisions. Order No. 93-070 and Monitoring and Reporting Program C.I. 7336 also contain provisions that are inconsistent with the Standard Provisions. Those orders should be revised to eliminate the inconsistencies.

The petitioners are also concerned that the monitoring program is not adequate to detect migration through bedrock pathways at the landfill to adjacent ground water basins and that the LARWQCB has failed to recognize the potential for such migration. Hydrogeologic studies for the landfill indicate that a potential for ground water to migrate from the landfill site through bedrock into adjacent basins exists but is limited[7] and the LARWQCB has indicated such potential in the waste discharge requirements. The detection monitoring program in place is capable of detecting landfill releases because monitoring data have indicated a release of certain constituents at Barrier 1. Detection monitoring, however, is not intended to determine offsite migration. Detection monitoring is intended to provide early detection of releases from a waste management unit. Once a release from a waste management unit is detected, migration of releases offsite must be addressed through an evaluation monitoring program and corrective action where appropriate. At this landfill, a release has been detected; therefore, an evaluation monitoring program must be implemented as required by Chapter 15 (23 CCR Section 2550.9).

2. Contention: The petitioners contend that the waste discharge requirements for the landfill liner containment system

---

[7] *For the lateral expansion, see the discharger's report of waste discharge (May 1993) at Section 3.8.3.2 on pages 4-45; for subsurface Barrier 2, see report entitled "Hydrogeologic Study for the Subsurface Barrier No. 2 at the Puente Hills Landfill, Whittier, California" (May 1983) at Sections 4.2 and 4.3; and for the Main Canyon and Canyon 9, see report entitled "Technical Report and Workplan for Background Ground Water Monitoring System for Main Canyon and Canyon 9" at pages 3-5.*

for the lateral expansion fail to comply with Chapter 15 and applicable portions of Subtitle D as implemented in SWRCB Resolution No. 93-62.

Finding: The SWRCB agrees, in part, with this contention. Chapter 15 and SWRCB Resolution No. 93-62 specify liner requirements for Class III landfills. Since the lateral expansion will have steep side slopes, it is required to have an alternative liner with a synthetic liner component that meets federal performance standards contained in 40 CFR Section 258.40(a)(1) and (c).[8] Although the proposed liner design exceeds the minimum standards in Resolution No. 93-62, Order No. 93-070 does not adequately specify the requirements that apply to the liner design. However, the discharger has implemented a design that exceeds the minimum standards, and Order No. 93-070 should be revised to include the specifications of this liner and alternative containment systems for the lateral expansion.

3. Contention: The petitioners contend that the LARWQCB has failed to adequately address the effectiveness of the cement-bentonite barriers to contain leachate from migrating offsite.

---

[8] *See SWRCB Technical Report at pages 13-14, which discusses the liner design and requirements in greater detail. An alternative liner design system for steep side-slopes must either be a composite system which consists of a synthetic liner at last 40 mils thick (or 60 mils thick HDPE) or a system that includes a synthetic liner at least 60 mils thick (or 80 mils thick HDPE). The discharger proposes an alternative design that includes a 60 mils thick HDPE and a geocomposite liner consisting of bentonite and a 30 mils thick HDPE liner, which exceeds the minimum standards.*

Finding: The SWRCB disagrees with this contention. The LARWQCB adequately addressed the effectiveness of the subsurface barriers. According to applicable regulations,[9] subsurface barriers must be installed for Class III waste management units only if specifically required by a Regional Board to ensure that lateral permeability standards specified in Chapter 15, Article 3 are satisfied. The LARWQCB did not specifically require the installation of subsurface barriers at the landfill as containment features; they were voluntarily installed by the discharger as protective measures for potential releases and as part of a monitoring network. The LARWQCB did not intend to rely on the subsurface barriers for containment; rather, it required detection monitoring locations to be placed both upgradient and downgradient of the barriers to address the potential for landfill releases. Comparison of upgradient and downgradient water quality data does provide a means for assessing the containment capabilities of the subsurface barriers on an ongoing basis.

4. Contention: The petitioners contend that the site characterization is inadequate with respect to background water quality. Specifically, the petitioners contend that there has been a failure to obtain adequate and reliable background water quality data; that designated background wells do not adequately

---

[9] *Chapter 15, Sections 2540(c), 2545, and 2550.7(b)(1)(B) contain subsurface barrier requirements.*

reflect background water quality conditions; and that background wells are not located appropriately with respect to downgradient monitoring wells.

Findings: The SWRCB agrees, in part, with this contention. The SWRCB believes that better methods are available for site characterization with respect to background water quality and that the data collected may not be representative of all portions of the landfill site. Furthermore, the method used for determining background and the evaluation of monitoring data may not adequately reflect the relationship between background water quality and water quality at all compliance monitoring points.

Chapter 15, Sections 2550.4(a) and (b), 2550.7(b) to (e), 2550.8(c), 2595(g)(7), and 2601, and 40 CFR Section 258.51(a)(1) contain background monitoring requirements. The intent of those requirements is to direct the discharger to obtain water samples that have not been affected by the waste discharge. The concentration values of monitoring parameters and constituents of concern analyzed in background samples form the basis for comparison with concentration values at compliance monitoring wells. Typically, background samples are collected from locations hydraulically upgradient of the waste management unit and compliance monitoring wells are located downgradient from the waste management unit at the designated points of compliance. The applicable regulations allow the use of an alternative method if the hydrogeologic features of a site do not

allow the direction of ground water flow to be determined or if sampling at other locations is more representative of background water quality. To be considered representative, the alternative method must reflect site conditions unaffected by the waste discharge and must yield samples comparable with all compliance monitoring points.

The discharger used an alternative method to determine background through several studies involving samples from wells not located upgradient from the existing landfill. This alternative method does not comply with Chapter 15, Section 2595(g)(7) because although the discharger used samples unaffected by the waste discharge, it used samples that remain to be demonstrated as being representative of the site.

Ground waters at the landfill contain high concentrations of naturally-occurring chemicals, including the specified monitoring parameters (total dissolved solids (TDS), sulfate, chloride, and boron), but there is a significant geographic variation from one portion of the landfill to another. The discharger did not fully take this geographic variation into account in analyzing data. For example, monitoring parameter concentrations differ significantly between three different background wells (M17A, M18A, and M19B). The background well data have been pooled for comparison to monitoring points. Pooling of these data result in background concentration values of monitoring parameters that have large ranges. As a result, the pooled data indicate that background concentrations are

higher than certain compliance monitoring point concentrations. Another consideration is that background concentrations from the three background wells show significant variations or trends through time.

SWRCB analysis of the available monitoring data indicate significant geographic variations within the site which appear to reflect release potentials of the different portions of the landfill.

To more accurately reflect site conditions, each portion of the site should be considered separately for the establishment of background concentration values. If background concentration values cannot be established that are hydraulically upgradient from each portion, alternative methods should be considered.

5. Contention: The petitioners contend that the LARWQCB has failed to adequately address evidence of releases and migration from the landfill, including the detection of VOCs in the area of Barrier 1 in the Main Canyon.

Findings: The SWRCB agrees, in part, with this contention. In accordance with applicable regulations, the LARWQCB established water quality protection standards for specified monitoring parameters based on the background concentration values for the landfill and required statistical analysis of monitoring data to determine if there has been a release. The dischargers are required to submit an annual report evaluating detection monitoring data for the existing landfill to

determine whether there is an indication of a release. If there is a statistically significant increase in the concentration of any waste constituent above applicable threshold limits, the site will be considered to be leaking wastes. The discharger's 1992 report concluded that the landfill did not produce and release any leachate that may adversely affect the water quality in the vicinity of the landfill and that water quality was the same as background water quality.

The discharger used a qualitative approach to evaluate the monitoring data rather than a statistical approach as required by the regulations and the waste discharge requirements. However, using a qualitative approach still indicates tentative evidence of a release. SWRCB analyses indicate the water quality at some of the compliance monitoring wells is not the same as that in the background wells. At some of the Barrier 1 monitoring wells, concentrations of certain constituents exceed the background concentrations and water quality protection standards. These facts should be interpreted as a tentative indication of a release.

Monitoring data indicate that VOCs are present in ground water at several locations at the landfill and in some areas at levels above state drinking water standards, i.e., maximum contaminant levels. The discharger's 1992 report concludes that the presence of VOCs is due to contact of ground water with landfill-derived gas or from offsite sources, not from leachate.

The SWRCB disagrees with this analysis and believes that a resolution of this issue, as well as others related to potential releases at the site, can only be resolved through a complete and thorough evaluation monitoring program.

After the filing of this petition, the discharger submitted an evaluation monitoring program that was approved by the LARWQCB on August 24, 1995.[10] SWRCB's preliminary review of this program indicates that the discharger's proposed evaluation monitoring program does not provide for a complete delineation of the release, including its magnitude and extent. The LARWQCB should require the discharger to submit a revised evaluation monitoring program that delineates any releases of constituents of concern using appropriate historical monitoring data or other alternative methods. Upon approval, the LARWQCB should revise the monitoring and reporting requirements to incorporate the evaluation monitoring program. The LARWQCB should also revise the detection monitoring program for the portions of the landfill not covered by evaluation monitoring after evaluating the effectiveness of the existing detection monitoring program and monitoring well system, and after determining background water quality levels which are representative of the site.

---

[10] *At the time this petition was filed, the discharger had not submitted an evaluation monitoring program. The discharger subsequently submitted an evaluation monitoring program report, which was later approved by the LARWQCB. The SWRCB staff was not aware of this report or the LARWQCB's approval of it until February 1996.*

6. Contention: The petitioners contend that the LARWQCB failed to comply with CEQA, specifically Public Resources Code Sections 21002.1(b) and (d) and 21104 and with the CEQA guidelines, specifically Title 14, California Code of Regulations, Sections 15096(d), (f), (g), (h), and (i).

Finding: The SWRCB disagrees with this contention. Public Resources Code Section 21002.1(b) requires a responsible agency to "mitigate or avoid the significant effects on the environment of projects it approves or carries out whenever it is feasible to do so." Public Resources Code Section 21002.1(d) requires a responsible agency to consider "only the effects of those activities involved in a project, which it is required by law to . . . approve." Public Resources Code Section 21104 requires the lead agency to consult with and obtain comments from each responsible agency. Title 14, CCR, Section 15096 specifies how a responsible agency is to comply with CEQA with respect to, among other provisions, comments to the lead agency (§ 15096(d)), adoption of mitigation measures (§ 15096(g)), and findings (§ 15096(h)).

In this case, the LARWQCB consulted with and provided comments to the Sanitation Districts on the EIR and incorporated mitigation measures into the waste discharge requirements as identified in the EIR and Supplemental EIR as required by CEQA and the guidelines.

Pursuant to Public Resources Code Section 21167.3(b), if a lawsuit is filed challenging the adequacy of an EIR, a

responsible agency is required to assume that an EIR complies with CEQA pending a final court order and must approve or disapprove the project. The applicant proceeds at its own risk pending the final determination of the lawsuit. In this case, the LARWQCB, as the responsible agency, complied with Section 21167.3(b). At the time it adopted Order No. 93-070, there was no final court determination in the lawsuit. The LARWQCB, therefore, was obligated to approve or disapprove the project. As discussed above in Contention and Finding No. 6, however, there is evidence of a release and to comply with applicable regulations, the LARWQCB must require the discharger to revise its evaluation monitoring program and take corrective action, if necessary.

III. SUMMARY AND CONCLUSIONS

1. The detection monitoring requirements in Waste Discharge Requirements Order Nos. 90-046 and 93-070 are not adequate because they fail to incorporate site-specific requirements that reflect the complex geology and hydrogeology of the site and are inconsistent with SWRCB Resolution No. 93-62 as specified in the Standard Provisions attached to those orders. The detection monitoring requirements are not intended to determine offsite migration.

2. Order No. 93-070 should be amended to specify applicable requirements with respect to the landfill liner containment requirements.

3. The LARWQCB did not fail to adequately address the effectiveness of subsurface barriers at the landfill.

4. The site characterization of the landfill must be amended with respect to background water quality monitoring and adequately reflect the relationship between background water quality and water quality at compliance monitoring points.

5. The LARWQCB has failed to adequately address evidence of releases from the landfill. The LARWQCB should require the discharger to submit a revised evaluation monitoring program. Upon approval, the LARWQCB should revise the monitoring and reporting requirements to incorporate the evaluation monitoring program. The LARWQCB should revise the detection monitoring program for the portions of the landfill not covered by evaluation monitoring based on background water quality levels which are representative of the site.

6. The LARWQCB complied with CEQA.

IV. ORDER

IT IS HEREBY ORDERED that:

1. Waste Discharge Requirements Order Nos. 90-046 and 93-070 and the associated monitoring and reporting programs be revised consistent with this Order; and

2. The LARWQCB shall require the discharger to revise the evaluation monitoring program consistent with this Order, revise the monitoring and reporting requirements to incorporate the revised evaluation monitoring program, revise its detection

monitoring program for the portions of the landfill not covered by evaluation monitoring to incorporate more appropriate background water quality levels, and implement an adequate corrective action program where appropriate.

IT IS FURTHER ORDERED that in all other respects, the petition is denied.

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 May 29, 1996.

AYE: John P. Caffrey, Chairman
John W. Brown, Vice Chairman
Marc Del Piero, Member
James M. Stubchaer, Member
Mary Jane Forster, Member

NO: None.

ABSENT: None.

ABSTAIN: None.

Maureen Marché
Administrative Assistant to the Board