

**California Regional Water Quality Control Board
Los Angeles Region**

**Executive Officer's Report
Dennis A. Dickerson, Executive Officer**

December 9, 1999

INSIDE THIS REPORT :

Groundwater Division
Enforcement
Stormwater
Remediation
Underground Storage Tanks
Surface Water Division
Watershed Regulatory
Regional Programs
Watershed/Coastal Waters
Outreach
Staff Development
Administrative Services

*** The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption

*** For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>

December 15th Litter Conference

The Regional Board, Keep California Beautiful, Chevron Products Company, University of Southern California (USC), and California Coalition for Pollution Prevention are jointly sponsoring a litter conference on December 15, 1999. The conference will focus on the issue related to urban litter and it's impacts to our waterways. The target audience is both municipalities and commercial establishments that produce much of the litter that are found in our rivers and on our beaches. The format of the conference is designed to provide both education and allow attendees to participate in the development of solutions. For more information on the conference please call Rod Collins at (213) 576-6690.

The LARWQCB Celebrates it's 50th Year Anniversary

The Regional Board will be holding a special dinner event immediately following the regular Board Meeting on January 26, 2000 to celebrate 50 years of protecting water quality throughout Los Angeles and Ventura Counties. The location has not been confirmed, but everyone is invited to attend. More details will be available by the end of December. Please contact Robyn Goodman at (213) 576-6613 for more information or if you plan on attending this special event.

Board Member Appointed by Governor

In November, the Governor appointed a new Board Member to serve on the Regional Board. Susan Cloke, of Santa Monica, was appointed to serve the County Government category. She has owned Stonebridge, a land use and design company since 1993.

Cal/EPA Organizational Review

Secretary Hickox is required to complete an analysis of Cal-EPA organizational efficiency and funding adequacy by January 10, 2000. The Secretary has contracted with R & G Consultants to assist in this analysis. R & G Consultants is now in the process of conducting interviews at Cal-EPA Boards and Departments. Some of the primary topics to be addressed are coordination between the Secretary and the Cal-EPA departments, enforcement laxity, departmental coordination problems,

and efficiency of existing funding mechanisms to address the highest priority issues. R & G Consultants have reportedly set December 10, 1999 as the goal for submission of a draft report to the Secretary.

USEPA Review of the NPDES Program

In June 1998, staff of the United States Environmental Protection Agency (USEPA) began a systematic review of the NPDES program in the State and Regional Boards. This was part of a national effort by USEPA to ensure that there is a "level playing field" throughout the country for enforcement issues and concerns about a general trend of backlogged expired NPDES permits. The Los Angeles Regional Board was the first to be reviewed. As of today, reviews have also been conducted at the Central Valley and San Diego Regional Boards. The final report on the review of the Los Angeles Board's NPDES program has just been released (dated October 1999) while the reports on the other Regions are still being prepared. Five elements of the NPDES program were reviewed: Permits, Compliance, Storm Water, Pretreatment, and Enforcement. As USEPA visited the different Region Boards, they discovered that there were a number of issues that existed at the local Region level but there were also a number of issues that required a solution at the State level. The report of the Los Angeles Region is generally very favorable; it identified 24 strengths of the program, 19 deficiencies that need change at the Regional Board level, and 11 suggested changes to better the program.

Separate from the specific issues that deal directly with only the Los Angeles Regional Board, the report pointed out 14 State-wide issues that affect the Regional Board programs but must be settled at the State Board level.

A. ENFORCEMENT & REMEDIATION

Industrial Storm Water Program Compliance Update

Annual Industrial Storm Water Reports for all Industrial Storm Water General facilities were due on July 1, 1999. Approximately 2,395 annual reports for the 2,800 Industrial Storm Water Facilities within the Region have been received and entered into the SWRCB database by staff. A more detailed review of the annual reports to determine adequacy of the information submitted is being initiated. 446 Notices of Non-Compliance for Failure to Submit the Annual Reports were mailed out on October 26, 1999. A 2nd level enforcement letter will be sent to all of the facilities that did not respond to the Level 1 letter around November 29, 1999.

The ACL's prepared for facilities that have failed to submit annual reports for previous years were not heard at the October Board Meeting because of time constraints and have been carried over to the December Board Meeting.

Hearing of the Select Committee on the San Gabriel Valley Groundwater Contamination: Assemblyman Thomas M. Calderon (Chair)

On July 28, 1999, the Regional Board and other agencies participated in a hearing before Assemblyman Calderon's Select Committee, presenting information about accomplishments, issues, and future direction in the San Gabriel Basin cleanup effort. At the request of Assemblyman Calderon, Regional Board staff participated in a second hearing on November 30, 1999. Dennis Dickerson, Wendy Phillips, Arthur Health, and Ejigu Solomon participated in the hearing, summarizing recent Regional Board efforts toward soil assessments and cleanups in the Baldwin

Park Operable Unit.

Cleanup and Abatement Order issued to Aerojet and Huff Corporation

On November 24, 1999, the Executive Officer issued Order No. 99-073, directing Aerojet General Corporation to cleanup and abate the effects of contamination discharged to soil at Aerojet's 125-acre site in Azusa. A similar order was issued to Huff Corporation on December 1, 1999. These are the first of several Orders that the Regional Board is in the process of issuing to dischargers in the Baldwin Park Operable Unit of the San Gabriel Basin Superfund site. Under the Orders, dischargers are directed to assess and cleanup soil contamination and to coordinate groundwater monitoring.

Furthermore, the Orders contain a provision for offsetting impairments to drinking water wells; i.e., in the event that water suppliers and their customers end up bearing a significant portion of the cleanup costs, the Regional Board will consider requiring dischargers to prepare and implement a plan to assist purveyors to offset impairments and ensure an adequate, safe, and dependable supply of drinking water to San Gabriel residents.

Water Quality Impairments In Port Hueneme Harbor

In response to complaints from NPDES permittees in the Port Hueneme harbor, Regional Board staff inspected the area on October 10, 1999. Staff determined that the harbor was being impacted by oxygen demanding pollutants and ammonia toxicity. The probable source was determined to be off-loading operations of several squid facilities. Dissolved oxygen near the facilities was <1 mg/L and ammonia nitrogen was in the range of 2-5 mg/L near the squid boats being off-loaded. Two of the NPDES permit holders in the harbor, Channel Islands Marine Research Institute and Channel Islands Ocean Farms, were affected by the low dissolved oxygen and ammonia because their intake pipes are within the harbor. On November 1, 1999, Regional Board staff met with representatives of the squid processing companies in Port Hueneme Harbor. It was decided at this meeting that the facilities would implement five Best Management Practice (BMPs) in order to meet Basin Plan objectives in the harbor. By implementing these actions, stakeholders, including Regional Board and Department of Fish and Game staff, were anticipating a decrease in the ammonia and an increase in the amount of dissolved oxygen in the receiving water. Subsequent discharge monitoring reports and receiving water quality monitoring did not demonstrate an improvement in water quality.

On November 24, 1999, the Executive Officer transmitted a Notice of Violation letter to squid processing facilities at the port. The letter required the facilities to cease all dumping into the harbor, and to come into compliance with the requirements of the Porter-Cologne Water Quality Control Act.

Contaminated Soil Cleaned up from the Chandler's Landfill

Overseen by Regional Board staff, the clean up of approximately 1,200 tons of lead contaminated soil at the Chandler's Inert Landfill in the City of Rolling Hills Estate was completed on October 27, 1999. The contaminated soil was discharged at the landfill as regular inert waste by the City of Rancho Palos Verdes in July from its Point Vicente Interpretive Center (PVIC) construction site. It was later found out that the construction site was used by the Federal government as a shooting range in the 1940's and 50's.

When the incident was reported to the Regional Board early September, staff sent a notice of non-compliance letter to the owner of the landfill, requiring the clean up of the contaminated soil. Board staff communicated with the State DTSC and the LA County DHS, organized coordination meetings at the Regional Board office, participated a hearing at the City of Rolling Hills Estates, reviewed and approved the workplan for the clean up project, and made five field inspections to ensure complete and prompt clean up. Board staff are revising the Waste Discharge Requirements for the inert

landfill, and will propose adoption at the March 2000 Board meeting.

Malibu Septic System Study

Regional Board staff continued participation in a joint sampling effort with the City of Malibu. Joint sampling efforts were conducted when Malibu Lagoon breached its berm on November 11, 1999 and again on November 15, 1999.

Staff continue to issue 13267 letters, to be followed by Waste Discharge Requirements to all businesses and multiple unit dwellings in the study area. Dischargers are being required to file a "Report of Waste Discharge" (ROWD). The owners of approximately 80 systems will be issued letters to report their discharges. Approximately 20 letters are sent every other week. Waste Discharge Requirements will be issued for each of the dischargers after the Regional Board receives the ROWD.

Santa Anita Race Track

On October 26, 1999, the Executive Officer issued an administrative civil liability, in the amount of \$150,000, to the Los Angeles Turf Club for a discharge from the Santa Anita Racetrack, in violation of Waste Discharge Requirements (WDRs) specified in Board Order 97-03. The discharge was to the Santa Anita Wash, which is tributary to Rio Hondo. This facility is also subject to a Cleanup and Abatement Order and, as of the Board meeting on October 28, 1999, this facility also is subject to revised WDRs and a Cease and Desist Order mandating upgrades for wastewater management.

B. SURFACE WATER UPDATES

Investigation of a Suspected Sewer Line Break in Calabasas the Weekend on November 13, 1999

Over the weekend of November 13, 1999, staff received a complaint from Mr. Mark Abramson, of Heal the Bay who reported he had found a possible sewer line break in upper Las Virgenes Canyon. He described the discharge as a seep from the ground, and described the smell as rotten eggs. This is indicative of a sulphur spring. However, previous sampling by Heal the Bay showed the ammonia concentration was 30 mg/L, a concentration commonly found in sewage and in anoxic conditions caused by decaying organic material.

Heal the Bay had coordinated with the Hyperion Treatment Plant for the use of their laboratories to sample for Total and Fecal Coliform, and Enterococcus analyses. Early Sunday morning Carlos Urrunaga of the Regional Board visited an area where there was a very clear and strong sulphur odor. After walking the area, he discovered that in a dense stand of stinging nettles was a seep. The water was clear and came up from the ground and flowed above ground in a small stream. The stream had a black bottom and whitish gray areas within it. There was some foaming as the stream dropped in elevation in a riffle but the foaming was negligible.

Samples were collected and delivered to Hyperion for analysis. Early Monday morning November 15, 1999, Mr. Randal Orton of Las Virgenes Municipal Water District was contacted about the discharge and related odor problems. Mr. Orton quickly returned the call and described a sulphur spring in the area. Mr. Ron Kressie

at the Hyperion Treatment Plant also phoned on Monday November 15, 1999 to say that preliminary results do not indicate the presence of raw sewage. The source of the discharge and related odor is from a naturally-occurring sulphur spring in Las Virgenes Canyon which flows to Malibu Creek.

Contaminated Sediments Task Force

The Los Angeles Basin Contaminated Sediments Task Force was established in 1998 by the California Coastal Commission and the Los Angeles Regional Water Quality Control Board, pursuant to Senate Bill 673 (Karnette), to develop a long-term management plan for dredging and disposal of contaminated sediments from coastal waters adjacent to Los Angeles County. On November 2, 1999, the Task Force held its second annual Public Workshop in Santa Monica as part of the Coastal Commission's monthly meeting. The purpose of the workshop was to report on the Task Force's progress towards development of the management plan, which must be completed by January 1, 2003, and solicit public input and comments.

Michael Lyons, Regional Board staff, presented a summary of the Task Force's accomplishments over the past year. One of the biggest successes was coordination of a multi-user disposal site, involving dredging and disposal of contaminated sediments from the Port of Long Beach's West Basin Dredging Project, the U.S. Army Corps of Engineer's Los Angeles River Estuary Dredging Project and the Corps' Marina Del Rey Dredging Project. The Task Force also completed reports dealing with methods for streamlining the existing dredging permit application and review process, identifying studies (data gaps) required to complete the long-term management strategy, and outlining the process for adoption and implementation of the strategy by state and federal regulatory agencies.

Despite these successes, several issues will need to be addressed during the upcoming years. Although the Karnette bill provided funding for staff resources at the Coastal Commission and the Regional Board, no funds were provided for special projects. A major focus of the Task Force over the next year will be to obtain funding to conduct the studies required to fill data gaps and allow completion of the long-term management strategy. The Task Force also plans to continue to evaluate treatment and beneficial re-reuse of contaminated dredged material. Although these alternatives are technically feasible, costs remain higher than other traditional disposal methods. However, additional research or pilot projects may allow us to reduce these costs to manageable levels. Finally, the Task Force will continue to work on ways to improve the permitting process for dredging projects.

Total Maximum Daily Loads (TMDLs)

Los Angeles River Watershed

A draft Trash TMDL was completed for the Los Angeles River Watershed. It was sent to EPA on October 22, 1999, and is currently undergoing internal review.

Trash TMDL-East Fork San Gabriel River

On October 28, 1999, the Regional Board approved the East Fork TMDL and passed a resolution amending the Los Angeles Water Quality Control Plan to include the regulatory aspects of the TMDL. The East Fork of the San Gabriel River, located about three miles north of Azusa in the Angeles National Forest, is a popular area for families to picnic on the weekends. On a typical summer weekend, about 7,500 people recreate in the area. The enormous number of day users generate a huge amount of trash. Due to the large amount of trash in and around the river, the East Fork was listed as impaired on the 303d list. According to the U.S. Forest Service about 222 bags of trash are removed each weekend day from the area. Every type of litter is found, from broken glass to diapers. This TMDL will focus reduction efforts on public education and increasing the use of litter control measures. TMDL implementation will begin in Spring 2000.

Calleguas Creek - Chloride TMDL Activities

In October and November, 1999, a draft of the Basin Plan amendment for a chloride TMDL was reviewed internally and by State Board representatives. Revisions are underway. A public workshop

on the proposed amendment is planned for February 2000 with the presentation to the Board in early March 2000. Please call Jon Bishop at (213) 576-6681 or Elizabeth Erickson at (213) 576-6683 should you have any questions.

Santa Clara River - Chloride Policy Public Meeting

Regional Board staff had the proposed Basin Plan amendment to raise the chloride objective near Santa Clarita and Santa Paula reviewed by State Board representatives. Revisions are underway. The next meeting on the Santa Clara River chloride policy will be the final Board presentation now scheduled for January 20, 2000. A Memorandum of Agreement to cooperate on monitoring the quality of surface water and groundwater has been circulated to stakeholders and signed by representatives of all publicly owned treatment works that discharge to surface water discharges. Please call Jon Bishop at (213) 576-6681 or Elizabeth Erickson at (213) 576-6683 should you have any questions.

Trash TMDL-Los Angeles River

A draft TMDL was completed for the Los Angeles River watershed which is on the 303(d) for trash. It was sent to EPA on October 22, 1999, and is currently undergoing internal review.

TMDL Unit- New staff

Rod Collins joined the TMDL section as an Environmental Specialist III on November 1, 1999. Rod earned a B.A. in Environmental Biology from California State University, Northridge. He has spent the last 9 years working in the Solid Waste industry with Waste Management, Inc. and BFI/Allied Waste in the Los Angeles area.

Melinda Merryfield-Becker joined the TMDL section as unit chief on November 29, 1999. Melinda earned a B.A. with a double major in chemistry and political science, from Duke University. From 1981-1983 she was the group leader of the Ohio EPA Northeast District Office Resource Conservation Recovery Act Unit for which she won a service award from the governor. For the past 15 year she has worked as a consultant to private industry, most recently as the Director of Waste Management Programs at Meredith/Boli and Associates.

C. GROUNDWATER UPDATES

Charnock Sub-basin MTBE Investigation Area

At present there are 26 active sites in the Charnock Sub-Basin. One previously unknown site has been identified as a former underground storage tank site at a delivery service company. An initial information package will be sent soon. Of the 25 active sites, site assessment has been completed at 16 sites, whereas there are 9 sites where additional site assessment is either underway or planned to be performed in the near future. Groundwater monitoring is being performed at all the sites.

Quarterly groundwater monitoring reports are received, reviewed, and commented upon on within a short time. A total of five sites have approved remediation workplans for the cleanup of the soil and groundwater. Two of the sites needed to pump-and-treat the groundwater and discharge it to the storm drain under an NPDES permit. The NPDES permits were approved by the Regional Board during the July 8, 1999 Board meeting. Soil and groundwater remediation has begun at two of the sites, on-site soil remediation is underway at two additional sites and limited offsite remediation has been initiated at an additional site.

Staff performs a project status update telephone conference with the interested parties and USEPA. Staff also attends meetings and participates in telephone conferences to discuss the pilot project cleanup alternatives for the remediation of the groundwater.

On September 22, 1999, the Executive Officer and EPA issued separate enforcement orders to Shell Oil Company/Shell Oil Products Company/Equilon Enterprises LLC (collectively called Shell) for water replacement costs. The Orders were issued to ensure the residence of the City of Santa Monica and Culver City continue to receive historic water supplies in the wake of MTBE groundwater pollution at the Charnock Wellfields. The enforcement Orders require Shell to either provide replacement water of a suitable quality or to pay the City of Santa Monica and Southern California Water Company to purchase replacement water. The cost to purchase replacement water is estimated at \$3.5 million per year. Shell must commence payment or provide replacement water starting on January 7, 1999.

A CAO was also issued to CONOCO in April 1999. The CAO required CONOCO to perform site investigation in a tiered approach with on-site soil and groundwater investigation to be followed by off-site assessment and data interpretation of the subsurface lithology. Following the issuance of CAO, staff had a meeting with representatives of CONOCO on May 11, 1999. Tier One work has been initiated at the site under direction from the Regional Board and USEPA.

Arcadia Wellfield MTBE Investigation

The shallow aquifer in the vicinity of the former Mobil Station 18-LDM has been treated with a pump and treat system since October 1997. The treatment system is capable of pumping 35 gallon per minutes (GPM) of extracted groundwater water. Currently, approximately 5 to 6 GPM of groundwater are being pumped from 12 groundwater extraction wells. To date (10/27/99), the treatment system has pumped 6.31 million gallons of groundwater and removed an estimated amount of 51.8 pounds of TPH and 169.8 pounds of MTBE.

The impacted soil in the vadose zone is being treated with a vapor extraction system (VES) starting May 1999.

A Production Aquifer Remediation System (PARS) using activated carbon filtering to clean up the production aquifer has been designed and approved by this Regional Board. In a public hearing by City of Los Angeles Planning Department on August 12, 1999, the variance application for the installation of PARS has been approved. Mobil has selected a subcontractor to construct the PARS beginning January of 2000.

A Remedial Action Plan to clean up the MTBE contamination in the lower aquifer has been approved on May 21, 1999. Mobil has selected a subcontractor to build the lower aquifer remediation system (LARS).

Appointment of Regional Board Staff Member as the Editorial Board Member for the International Journal of Environmental Forensics

Regional Board staff, Yue Rong, Ph.D. was invited to serve on the editorial board for the International Journal of Environmental Forensics. The journal is a peer-reviewed professional publication, primarily dealing with environmental data analysis and interpretation. Dr. Yue Rong has also been an Associate Editor for Journal of Soil Contamination since 1998. Dr. Rong's appointment enhances the professional image of the Board and increases the exposure of the Board to the scientific community.

Completion of Corrective Action at Leaking Underground Fuel Storage Tank Sites

Board staff have reviewed corrective actions taken for soil and groundwater contamination problems

from leaking UST's for the time of October 12, 1999, through November 15, 1999, and determined that no further corrective actions are required:

Wesley Tailor Company, Whittier (I-15109)
Shell Oil Company Service Station No.204-4539-4107, Los Angeles (900470089)
Grace Property Management Incorporated, Pico Rivera (I-04662)
Triangle Shopping Center, Redondo Beach (902780043)
Former API Alarm Systems, Long Beach (908050016)
ARCO Service Station No. 1104, Lakewood (I-03309)
Former Chevron Service Station No.9-0775, West Hollywood (96-132)
Lake Lindero Country Club, Agoura Hills (R-25747)

D. PUBLIC OUTREACH

Presentation on Standard Urban Storm Water Mitigation Plan (SUSMP)

The Executive Officer was a guest speaker for the Central Basin Water Association's quarterly meeting on November 4th. He provided information on the status of regulations regarding the NPDES permit and the SUSMP matter. In attendance was Regional Board Member Jack Coe. The Executive Officer is continuing to meet with interested parties to address the SUSMP issue. The SUSMP matter will be considered by the Board on January 6, 2000.

Issues Forum on "The Future of Groundwater Cleanup in the San Gabriel Valley"

At the request of the League of Women Voters, Wendy Phillips and Ejigu Solomon will represent the Regional Board in an Issues Forum on Monday, December 13th, at 6:30 p.m. in Baldwin Park. US EPA, State Department of Health Services, and local agencies also will be represented. The public will have a chance to ask these representatives about the San Gabriel Basin cleanup strategy, the role of various regulators, cleanup costs and funding, and other issues of concern to the public. The Issues Forum will be held at the Julia McNeil Senior Center, 14305 Morgan Street, which is behind the community center at the southeast corner of Morgan Park (access from Caesar Chavez Drive-parking off Ramona Blvd). Please call Mary Johnson, League of Woman Voters, Steering Committee Coordinator for the Southern California Environmental Action Committee, at (626) 332-6124 should you need more information about the Issues Forum.

Conference: Kick-off of USEPA EMAP project

On November 22, 1999, representatives from the USEPA presented an overview of the Environmental Monitoring and Assessment Program (EMAP) to staff and the public. EMAP is used to develop the tools necessary to monitor and assess the status and trends of national ecological resources, and specifically to identify stressors associated with the degradation of these resources. EMAP will be a five year effort with random sampling beginning in the summer of 2000 in Region 4's coastal waters, surface waters and landscape for conventional water quality, fish assemblage, macroinvertebrate assemblage, periphyton assemblage, physical habitat structure and riparian vegetation. Further information is available at <http://www.epa.gov/emap>.

UCLA Graduate Student Seminar

On November 2, 1999, Regional Board staff, Yue Rong (Underground Storage Tank Section), was invited to speak at the graduate student seminar for UCLA's Department of Civil and Environmental Engineering. The topic of the speech was "MTBE groundwater pollution at Santa Monica Charnock and Arcadia water supply well fields." Dr. Yue Rong presented the history and investigation on MTBE pollution problems occurred in Santa Monica since 1996. In attendance were about 25

graduate students and professors from the Department.

E. ADMINISTRATIVE UPDATE

Freedom of Information Act and Public Records Act Requests for the Month of October 1999.

Freedom of Information Act (FOIA) requests and Public Record Act (PRA) requests to review or copy public documents are a very important part of the work at the Regional Board. The FOIA and PRA cover most of the documents at the Regional Board. The State legislature adopted statutory language requiring that these requests be tracked by the Regional Boards. The FOIA and PRA require agencies to provide a response on the availability of the requested document within 10 working days (FOIA) or 10 calendar days (PRA) of receiving the request. The Regional Board has a procedure to respond to, and a database to track, these requests.

During the month of October 1999, 23 FOIA / PRA requests were received and processed. A response was provided within the mandated time frame for all requests except three, which were due to the complexity of the request.

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During the month of September 1999, 22 FOIA / PRA requests were received and processed. A response was provided within the mandated time frame for all requests.

Personnel Report

As of the month of October our staff was 112: 92 technical staff (including 2 part-time technical staff), 5 permanent administrative support staff, and 14 permanent clerical staff.

Staff is currently taking steps to fill 1 Unit Chief position, 15 technical positions, 1 Associate Governmental Program Analyst, 1 Associate Information Systems Analyst and 1 Principal Engineer.

Since September the following appointments have been made:

Tom Shih, Environmental Specialist II in the UST Coastal Unit
Samuel Unger, Associate Water Resource Control Engineer in the Enforcement and Special Projects Unit
Sonja Gettel, Associate Governmental Program Analyst in the Executive Office
Dipak Bishnu, Associate Water Resource Control Engineer in the L.A. Coastal Unit

The following separated from the Board:

James Kuykendall, Assistant Executive Officer, transferred to State Board effective 11/01/99.

F. ENFORCEMENT

SUMMARY OF ENFORCEMENT ACTIONS - OCTOBER 1 TO 31, 1999

Formal Enforcement Actions

Cease and Desist Order	4
Cleanup and Abatement Order	4
Administrative Civil Liability	3

Administrative Enforcement Actions

Permit violations	6
Direction to submit a technical report under Section 13267	6

Administrative Enforcement Actions for Overdue / Incomplete Reports

Discharge Monitoring Reports	3
Groundwater monitoring reports	9
Other technical reports	10
Site assessment plans	2
Site assessment reports	4

Administrative Enforcement Actions for Stormwater Permits

Failed to comply with permit requirements	7
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Total Enforcement Actions for October	53
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SPILLS REPORTED DURING OCTOBER 1999

ALL REPORTED SPILLS

Chemical	18
Crude oil	8
Diesel	17
Gasoline	3
Miscellaneous petroleum products	23
Oil	12
Other	4
Sewage	6
Waste water	3
Vapors	10
Drill Spills (Table Top Exercises)	0

Total	104
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SPILLS WHICH ENTERED WATERWAYS OR WATERS

Chemical	6
Crude oil	4
Diesel	9
Gasoline	0

Miscellaneous petroleum products	6
Oil	6
Other	1
Sewage	4
Waste water	2
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Total	38