California Regional Water Quality Control Board
Santa Ana Region

ORDER NO. R8-2004-0063

Waste Discharge Requirements
For

Lillo Service Station
11095 Magnolia Avenue, Riverside
Riverside County

The California Regional Water Quality Control Board, Santa Ana Region (hereinafter Regional Board), finds that:

1. Mr. Elias Atallah (hereinafter, Discharger) owns and intends to operate a currently inactive, Texaco-branded service station located at the northeastern corner of the intersection of Magnolia Avenue and La Sierra Avenue in the City of Riverside, Riverside County. The site is located at longitude 177°28"38" and latitude 33°54'14". The proposed facility will be an independent gasoline service station designated as Lillo Service Station.

2. In a June 10, 2004 letter, Board staff informed Mr. Atallah that waste discharge requirements (WDRs) would be drafted for his proposed gasoline service station. A report of waste discharge was not submitted for this facility, therefore, this Order is issued pursuant to California Water Code Section 13263(d).

3. The proposed facility is located upgradient of the wells that supply water to the Arlington Desalter Facility operated by the Santa Ana Watershed Project Authority (SAWPA).

4. The Arlington Desalter Facility began operation in 1990 by extracting and treating groundwater to remove salts, including nitrate, from the Arlington Groundwater Subbasin. The treated groundwater was discharged to the Santa Ana River for distribution to the Orange County Water District's (OCWD) groundwater recharge basins.

5. In May 2003, SAWPA began upgrading the Arlington Desalter well system to enable the system to produce and distribute treated groundwater to the City of Norco for domestic use. SAWPA is under contact to deliver 5400 acre-feet of potable drinking water to the City of Norco, as well as water to the OCWD for recharge to their groundwater basins.

6. The Arlington Desalter extracts groundwater from five extraction wells located southwest (hydraulically downgradient) of the proposed facility. Extraction Well #5 is the closest well and is less than 1000 feet from the proposed facility.

7. The Desalter extraction wells extract groundwater from a shallow (approximately 80 to 140 feet below ground surface), highly permeable and transmissive aquifer within mainly interbedded silts, clays, fine to coarse sands, and gravels.

8. Given the highly transmissive nature of the underlying aquifer, the shallow depths to groundwater, and the shallow depths of the groundwater extraction wells, the Arlington Desalter wells are highly vulnerable to nearby releases of pollutants.

9. Regional Board and SAWPA staff have identified four service stations, including the former Texaco-branded station, within 1000 feet of the extraction wells. The Texaco-branded station (the site of the proposed facility) and an adjacent Shell Oil service station were located at opposite corners of the intersection of Magnolia Avenue and La Sierra Avenue. Shell Oil acquired the Texaco-branded station as part of its merger with Texaco Oil Company. The Texaco-branded station and the Shell Oil Station ceased operating in 2003 and 2004, respectively. The two remaining operating stations are Arco and Mobil service stations located at opposite corners of the intersection of Magnolia Avenue and Pierce Street.

10. In recent years, studies conducted by the U. S. EPA, the State Water Resources Control Board, and the Santa Clara Valley Water District have provided strong evidence that hydrocarbon releases have occurred from new and upgraded underground storage tank (UST) systems. In 1999, the California State Water Resource Control Board, in a report titled 'Leak History of New and Upgraded UST Systems', reported that there is evidence of releases from new and upgraded UST systems, apparently resulting from improper installation, operation, or maintenance. Several components, such as underground dispenser piping, pipe fittings and turbine sumps were found to be the source of a disproportionate number of releases. Additionally, there is evidence that leak detection programs may not be performing as intended. The report noted that only 4.5 percent of the releases in the LUSTIS database and only 0.7 percent of those in the inspection database were discovered by the UST system leak detection activities. The U. S. EPA, in reporting the results of the Blue Ribbon Panel on Oxygenates in Gasoline, concluded that releases continued to be reported from 1998-compliant UST systems due to problems associated with improper design, construction, and operation and maintenance. In research performed by Santa Clara Valley Water District, MtBE was detected in the groundwater beneath 67% of the 28 sites examined, which were compliant with the 1998 upgrade requirements. The UST staff at SCVWD concluded that operating gasoline UST facilities posed a threat to water resources and recommended that groundwater monitoring be required at all gasoline UST facilities operating in sensitive groundwater basins. While these systems are constantly being improved, the above-referenced studies demonstrate that there is still a high likelihood of leaks. The operation of gasoline station USTs near public water supply wells in a shallow, highly transmissive and permeable aquifer is a unique situation requiring the exercise of special measures to prevent contamination of already-scarce sources of water supply.

11. Beginning in 2002, Board staff met with SAWPA staff and representatives from Shell Oil Products US, ExxonMobil, and Arco to require that additional groundwater monitoring and investigation be conducted at their operating gasoline service stations near the Arlington Desalter Facility well sites. In addition, these parties were required to develop

site contingency plans (spill response plans) to respond to any releases from the gasoline service stations from impacting the Arlington Desalter wells. These requirements are more stringent than those normally required for typical gasoline service stations and are intended to protect the highly vulnerable Arlington Desalter wells in the event of releases from these nearby gasoline service stations. Due to the reported high groundwater velocity, it is critical that accelerated groundwater sampling and site contingency plans be implemented to detect releases to the groundwater rapidly and to mitigate those releases promptly, in order to prevent adverse impact on the Desalter wells. If impacted by hydrocarbon releases, the municipal use of the public supply water from the Desalter wells would have to be reduced or completely stopped. Moreover, complex and expensive cleanup would have to be initiated and funded.

12. Shell Oil Products, ExxonMobil and ARCO are currently conducting the requested monitoring and have submitted a contingency plan without the need to issue individual WDRs to them.

13. Beginning in June 2004, Board and SAWPA staff met twice with Mr. Atallah regarding his intended operation of the former Texaco service station. Mr. Atallah was informed that he would be required to develop a site contingency plan and to conduct groundwater monitoring comparable to that currently being conducted by the owners/operators of existing gasoline service stations operating near the Desalter well sites. Since there is the high likelihood for hydrocarbon releases from Mr. Atallah's proposed UST system, it is appropriate to require that the quality of the groundwater beneath this system be monitored, in addition to the required tank monitoring. The purpose of the monitoring is to detect and respond to releases rapidly, and assess the magnitude of releases. Initially, Mr. Atallah did not agree to participate voluntarily in the required monitoring or to prepare a contingency plan, making the issuance of these requirements necessary. On July 22, 2004, Mr. Atallah's consultant delivered to the Regional Board office a Contingency Plan which includes a Monitoring Program along with a cover letter stating his intent to comply with the provisions of waste discharge requirements.

14. Currently, there are five existing groundwater monitoring wells (MW-1 – MW-5) located at the proposed facility that have been sampled quarterly since March 2003. Wells MW-2 and MW-3 have been sampled monthly since September 2003. MTBE was initially detected in MW-3 at a maximum concentration of 340 ug/l and has since decreased in concentration. MTBE has not been detected in any existing on-site monitoring wells since December 2003. The concentrations of TPH, BTEX compounds and all fuel oxygenates have been either non-detect or below their respective maximum contaminant levels (MCLs) since September 2003.

15. The underground storage tank (UST) regulations only require gasoline service station operators to conduct tank integrity monitoring and do not require groundwater monitoring and site contingency plans for dealing with potential releases of petroleum hydrocarbon compounds. However, the proposed operation of the facility poses a threat to the nearby Arlington Desalter wells. To assure that operation of the proposed Lillo facility is effectively controlled and monitored so as to prevent adverse impacts on

groundwater quality and public water supplies, issuance of waste discharge requirements for the proposed facility is necessary.

16. The Regional Board does not intend to issue waste discharge requirements to all gasoline service station owners/operators within the Region. The issuance of waste discharge requirements for the Lillo service station is necessary and appropriate in light of the unusually high vulnerability of the Arlington Desalter wells to releases of pollutants, such as are highly likely to occur with the operation of the Lillo gasoline service station.

17. This Order prohibits the discharge of petroleum hydrocarbon compounds into the ground from the proposed facility. This Order requires soil vapor and groundwater monitoring to determine whether discharges from the UST and dispenser system to the underlying groundwater have occurred, and the implementation of a site contingency plan approved by the Executive Officer to insure that any such discharges are mitigated to prevent impacts to the Desalter well system. The contingency plan defines the magnitude and conditions when a response to mitigate groundwater quality impacts is warranted. The site contingency plan is to be approved prior to receipt of fuel product in the onsite USTs.

18. A Water Quality Control Plan (Basin Plan) became effective on January 24, 1995. The Basin Plan contains beneficial uses and water quality objectives for waters in the Santa Ana Region.

19. The beneficial uses of the Arlington Groundwater Subbasin include:
    a. Municipal and Domestic Supply,
    b. Agricultural Supply,
    c. Industrial Process Supply, and
    d. Industrial Service Supply.

20. The requirements contained in this Order are necessary to implement the Basin Plan.

21. The quality and characteristics of the potential discharges and the impacts of the potential discharges on the affected receiving waters have been carefully considered. If conducted in accordance with the terms and conditions of this Order, the site operations should not result in adverse impacts to the beneficial uses of the affected receiving waters.

22. In compliance with the California Environmental Quality Act (CEQA, Public Resources Code Section 21000 et seq.), the City of Riverside Planning Commission adopted a Mitigated Negative Declaration for the facility on June 3, 2004. An updated CEQA document is expected to be certified by the City of Riverside in the near future.

23. The Regional Board has notified interested agencies and persons of its intent to issue waste discharge requirements for this facility and has provided them with an opportunity to submit their written views and recommendations.

24. The Regional Board, in a public meeting, heard and considered all comments pertaining to this Order.

**IT IS HEREBY ORDERED** that the discharger, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, shall comply with the following:

## A. PROHIBITIONS

1. The discharge of petroleum hydrocarbon compounds from the facility to the ground is prohibited.

2. The discharge of petroleum hydrocarbon compounds that may affect the beneficial uses of the groundwater is prohibited.

3. The discharge of petroleum hydrocarbon compounds to property not owned or controlled by the discharger is prohibited.

4. The discharge of any substances in concentrations toxic to human, animal, plant or aquatic life is prohibited.

## B. PROVISIONS

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

2. This Order becomes effective upon certification by the City of Riverside of the California Environmental Quality Act documentation for the proposed Lillo Service Station.

3. The discharger shall comply with Monitoring and Reporting Program No. R8-2004-0063 issued by the Executive Officer. The MRP shall be in effect starting with the first month after receipt of fuel product in the onsite USTs. This monitoring and reporting program may be modified by the Executive Officer at any time during the term of this Order, and may include a reduction or an increase in the number of parameters to be monitored, the frequency of the monitoring or the number and size of samples to be collected. Any such modifications may be returned back to the levels specified in the original monitoring and reporting program at the discretion of the Executive Officer.

4. The discharger shall establish a groundwater monitoring well network to adequately monitor any potential impact to the underlying groundwater from releases of petroleum fuel hydrocarbons from the underground storage tank and dispenser system. The groundwater monitoring wells shall be located and constructed so that representative

samples of the discharge to groundwater can be obtained. The groundwater monitoring well network shall be in place prior to the initial receipt of fuel at the station.

5. The discharger shall establish a soil vapor monitoring and extraction (M & E) system to monitor and extract any vapor from releases of petroleum hydrocarbons from the underground storage tank and dispenser system. The soil vapor M & E network shall be located and constructed so that the soils along the entire length of the fuel distribution system can be monitored for vapor releases. The soil vapor M & E system is to be installed and maintained in good working order to remain in compliance with the waste discharge requirements and the Monitoring and Reporting Program deadlines. Failure to install and monitor the soil vapor M & E system and provide appropriate reports is a violation of the Monitoring and Reporting Program.

6. The discharger shall implement the site contingency plan approved by the Executive Officer (see Provisions B.15., below).

7. Determination of the groundwater concentrations shall be based on the minimum levels/reporting level specified in Attachment "A" of M&RP No. R8-2004-0063 or on the lower detection limits achieved by the discharger.

8. When determining the average monthly concentration of the constituents of concern and more than one sample result is available in a month, the discharger shall compute the arithmetic mean unless the data set contains one or more reported determinations of DNQ or ND. In those cases, the discharger shall compute the median in place of the arithmetic mean in accordance with the following procedure:

    a. The data set shall be ranked from low to high, reported ND determinations lowest, DNQ determinations next, followed by quantified values (if any). The order of the individual ND or DNQ determinations is unimportant.

    b. The median value of the data set shall be determined. If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, then the median is the average of the two values around the middle unless one or both of the points are ND or DNQ, in which case the median value shall be the lower of the two data points where DNQ is lower than a value and ND is lower than DNQ.

9. The discharger must comply with all of the requirements of this Order. Any violation of this Order constitutes a violation of the California Water Code and may constitute a violation of the CWA and its regulations, and is grounds for enforcement action, termination of this Order, revocation and reissuance of this Order, denial of an application for reissuance of this Order; or a combination thereof.

10. The discharger shall take all reasonable steps to minimize or prevent any discharge that has a reasonable likelihood of adversely affecting human health or the environment.

11. The discharger shall take all reasonable steps to minimize any adverse impact to receiving waters resulting from noncompliance with any requirements specified in this Order, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncom plying discharge.

12. The discharger shall maintain a copy of this Order at the site so that it is available to site operating personnel at all times. Key operating personnel shall be familiar with its content.

13. The discharger shall notify the Regional Board in advance of any planned physical alterations or additions to the permitted facility or changes in operation including any material change or proposed change in the character, location or volume of the discharge or activity that may result in noncompliance with these waste discharge requirements.

14. The discharger shall, at all times, properly operate and maintain all facilities and systems, and related appurtenances that are installed or used by the discharger to achieve compliance with this Order. Proper operation and maintenance includes adequate laboratory controls, appropriate quality assurance procedures, effective performance, adequate funding, adequate staffing and training, and adequate process controls. This provision requires the operation of back up or auxiliary facilities or similar systems that are installed by a discharger only when the operation is necessary to achieve compliance with the requirements of this Order.

15. Prior to receipt of fuel product in the onsite USTs, the discharger shall submit a proposed contingency (spill response and cleanup) plan to be approved by the Executive Officer. Prior to approval of such plan, the Executive Officer shall consultant with SAWPA and Western Municipal Water District concerning the content of the contingency plan. The plan shall specify additional site assessment, soil vapor and groundwater monitoring, and remedial actions to mitigate the discharges dependent upon the nature and magnitude of the discharge.

16. The discharger shall allow the Regional Board and other authorized representatives:

    a. Entry upon premises where a regulated facility or activity is located or conducted, or where records are kept under the requirements of this Order;

    b. Access to copy any records that are kept under the requirements of this Order;

    c. To inspect the facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and

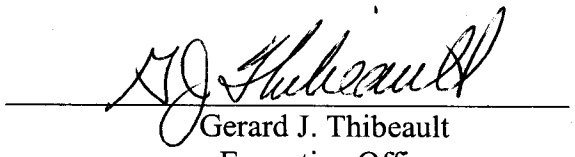
    d. To photograph, sample and monitor for the purpose of assuring compliance with this Order.

17. The discharger shall report any discharge of waste that may endanger health or the environment. Any information shall be provided to the Executive Officer (951-782-4130) and the Office of Emergency Services (800-852-7550), if appropriate, as soon as the

discharger becomes aware of the circumstances. A written report shall be submitted within five (5) days and shall contain a description of the discharge and its cause, the period of discharge, including exact dates and times and, if the discharge has not been corrected, the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the discharge.

18. The California Water Code provides that any person who violates a waste discharge requirement or a provision of the California Water Code is subject to civil penalties of up to $5,000 per day, $10,000 per day, or $25,000 per day of violation, or when the violation involves the discharge of pollutants, is subject to civil penalties of up to $10 per gallon per day, or $20 per gallon per day of violation; or some combination thereof, depending on the violation, or upon the combination of violations.

I, Gerard J. Thibeault, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Santa Ana Region, on August 13, 2004.



Gerard J. Thibeault
Executive Officer

California Regional Water Quality Control Board
Santa Ana Region

Monitoring and Reporting Program No. R8-2004-0063

Monitoring Requirements for Potential Releases of Petroleum Fuel Products from Operating Underground Storage Tanks near SAWPA Arlington Desalter Extraction Well Field
Lillo Service Station
Riverside, Riverside County
Santa Ana Region

## A. MONITORING REQUIREMENTS

1. All analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services or at laboratories approved by the Executive Officer of the Regional Board.

2. All sampling and sample preservation shall be in accordance with the current edition of "*Standard Methods for the Examination of Water and Wastewater*" (American Public Health Association).

3. All laboratory analyses shall be performed in accordance with test procedures under 40 CFR 136 (revised as of May 14, 1999) "Guidelines Establishing Test Procedures for the Analysis of Pollutants," promulgated by the United States Environmental Protection Agency (EPA), unless otherwise specified in this monitoring and reporting program (M&RP). In addition, the Executive Officer may specify test methods that are more sensitive than those specified in 40 CFR 136. Unless otherwise specified herein, organic pollutants shall be analyzed using EPA method 8260, as appropriate.

4. All analytical data shall be reported with method detection limits (MDLs)[1], and with identification of either minimum level (ML)[2] practical quantitation levels (PQLs)[3] or limits of quantitation (LOQs).

5. Laboratory data must quantify each constituent down to the Practical Quantitation Levels specified in Attachment "A." Any internal quality control data associated with the sample must be reported when requested by the Executive Officer. The Regional Board will reject the quantified laboratory data if quality control data is unavailable or unacceptable.

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1 *MDL is the minimum concentration of a substance that can be measured and reported with 99 percent confidence that the analyte concentration is greater than zero, as defined in 40 CFR 136, Appendix B, revised as of May 14, 1999.*

2 *Minimum level is the concentration at which the entire analytical system must give a recognizable signal and acceptable point. The ML is the concentration in a sample that is equivalent to the concentration of the lowest calibration standard analyzed by a specific analytical procedure, assuming that all the method specified sample weights, volumes, and processing steps have been followed.*

3 *PQL is the lowest concentration of a substance which can be determined within ± 20 percent of the true concentration by 75 percent of the analytical laboratories tested in a performance evaluation study. Alternatively, if performance data are not available, the PQL is the method detection limit (MDL) x 5 for carcinogens and MDL x 10 for noncarcinogens.*

6. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Groundwater samples shall be collected from each monitoring well using standard groundwater sampling methodologies and protocols. Soil vapor samples shall be collected from the soil vapor monitoring and extraction (M & E) system using standard soil vapor sampling methodologies and protocols.

7. Whenever the discharger monitors any pollutant more frequently than is required by this Order, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the discharge monitoring report specified by the Executive Officer.

8. The discharger may request a reduction in the constituents to be monitored and/or a reduction in monitoring frequency for a specific constituent(s) subject to the approval of the Executive Officer.

9. The discharger shall monitor those constituents that are detected at levels of concern[4] in the required volatile organic pollutant scan using EPA Method 8260.

10. The discharger shall assure that records of all monitoring information are maintained and accessible for a period of at least five years from the date of the sample, report, or application. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge or by the request of the Board at any time. Records of monitoring information shall include:

    a. The date, exact place, and time of sampling or measurements;
    b. The individual(s) who performed the sampling, and/or measurements;
    c. The date(s) analyses were performed;
    d. The individual(s) who performed the analyses;
    e. The analytical techniques or methods used;
    f. All sampling and analytical results;
    g. All monitoring equipment calibration and maintenance records;
    h. All data used to complete the application for this Order; and,
    i. Copies of all reports required by this Order.

11. Discharge monitoring data shall be submitted in a format acceptable to the Regional Board. Specific reporting format may include preprinted forms and/or electronic media. The results of all monitoring required by this Order shall be reported to the Board, and shall be submitted in such a format as to allow direct comparison with the limitations and requirements of this Order.

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4 *Levels of concern are detected values at/or greater than the California Department of Health Services MCL and action level values.*

12. The discharger shall deliver a copy of each monitoring report in the appropriate format to:

California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348

13. A "grab" sample is defined as any individual sample collected in less than 15 minutes.

14. Daily samples shall be collected on each day of the week.

15. Weekly samples shall be collected on a representative day of each week.

16. Monthly samples shall be collected on a representative day of the month.

## B. GROUNDWATER MONITORING

1. The discharger shall establish a groundwater monitoring well network to adequately monitor any potential impact to the underlying groundwater from releases of petroleum fuel hydrocarbons from the underground storage tank and dispenser system. The groundwater monitoring wells shall be located and constructed so that representative samples of the discharge to groundwater can be obtained. The following shall constitute the groundwater monitoring program:

| Constituent | Type of Sample | Units | Minimum Frequency of Sampling |
|---|---|---|---|
| Total Petroleum Hydrocarbons | Grab | µg/l | Monthly |
| Benzene | Grab | µg/l | Monthly |
| Toluene | Grab | µg/l | Monthly |
| Ethylbenzene | Grab | µg/l | Monthly |
| Xylene | Grab | µg/l | Monthly |
| Methyl tertiary butyl ether (MTBE) | Grab | µg/l | Monthly |
| Tert butyl alcohol (TBA) | Grab | µg/l | Monthly |
| Other fuel oxygenates | Grab | ug/l | Monthly |
| Ethanol | Grab | µg/l | Monthly |

2. The discharger shall implement a more frequent groundwater sampling schedule, as specified in the site contingency plan, upon the finding of any discharge that is violation of the discharge specifications.

3. If the existing groundwater monitoring wells become abandoned, then the discharger shall install new groundwater monitoring wells to reestablish an adequate groundwater monitoring network. The replacement wells shall be installed as soon as possible in order to remain in compliance with the waste discharge requirements and the Monitoring and Reporting Program deadlines.

## C. SOIL VAPOR MONITORING

1. The discharger shall establish a soil vapor M & E to adequately monitor the soils beneath the fuel distribution network for vapor releases. The soil vapor M & E system shall be located and constructed to monitor the soil under the entire length of the fuel distribution network. The following table shall constitute the soil vapor monitoring program:

| Constituent | Type of Sample | Minimum Frequency of Sampling |
|---|---|---|
| Total Petroleum Hydrocarbons | Grab or instrument reading | Weekly |

2. The discharger shall implement a more frequent soil vapor sampling schedule, as specified in the site contingency plan.

## D. REPORTING:

1. The discharger shall report the results of the above analyses to the Regional Board within 24 hours of finding any discharge that is in violation of the discharge specifications.

2. The discharger shall submit the monitoring reports by the 30th day of each month and shall include:

   a. The results of all chemical analyses for the previous month, and annual samples whenever applicable,

   b. A summary of the month's activities.

3. All analytical data shall be arranged in a tabular format to clearly show compliance or noncompliance with each discharge specification.

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

5. Upon completion of the project, the discharger shall notify the Executive Officer of the Regional Board in writing about cessation of the discharge and request for a rescission of this Order.

All reports shall be signed by a responsible officer or duly authorized representative of the discharger and shall be submitted under penalty of perjury.

Ordered by _____
Gerard J. Thibeault
Executive Officer

August 13, 2004

# California Regional Water Quality Control Board
## Santa Ana Region

**Terry Tamminen**
*Secretary for Environmental Protection*

3737 Main Street, Suite 500, Riverside, California 92501-3348
(909) 782-4130 • Fax (909) 781-6288
http://www.swrcb.ca.gov/rwqcb8

**Arnold Schwarzenegger**
*Governor*


August 19, 2004

Mr. Elias Atallah
1180 Tulip Street
Corona, CA 92882

TRANSMITTAL OF ADOPTED ORDER NO. R8-2004-0063

At the regular Board Meeting held on August 13, 2004, the Regional Board adopted Order No. R8-2004-0063. A certified copy is enclosed for your records.

Sincerely,

CATHERINE EHRENFELD
Staff Services Analyst

Enclosure: Adopted Order No. R8-2004-0063

c. State Water Resources Control Board, Division of Water Quality, James Maughan
United States Environmental Protection Agency, WTR 5, Permits Section, Doug Eberhardt
Mr. Eldon Horst, Santa Ana Watershed Project Authority
Mr. Roger Niemeyer, Hargis and Associates
Mr. Ken Gutierrez, City of Riverside Planning Department
Ms. Brenda Meyer, Western Municipal Water District
Mr. Kevin Graves, SWRCB, DFA
Mr. Cor Shaffer, Department of Health Services
Mr. David Wysocki, Aklufi & Wysocki, Attorneys at Law
Mr. Evan Privett, Frey Environmental
Mr. Doug Shackelton, Canty Engineering Group

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