G. Fred Lee & Associates

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October 12, 2004

For the October 14, 2004 SDWA Board Meeting

San Diego County Water Authority Board

I wish to submit the following statement on the proposed development of the Gregory Canyon Landfill.

I have been involved in evaluating the potential impacts of landfills on groundwater quality and the environment since the mid-1960s. I have evaluated over 80 landfills including the proposed Gregory Canyon Landfill. I have submitted detailed comments on the draft EIRs for this proposed landfill in which I have pointed out that this landfill will eventually pollute groundwaters that are of importance to the San Diego County Water Authority and the North County residents. The original and now revised landfill liner design will not prevent groundwater pollution by landfill leachate for as long as the wastes in this landfill will be a threat, which will be forever. The revised liner design only postpones when groundwater pollution will occur; it will not prevent it. The characteristics of the hydrology of the area are such that it is impossible to reliable monitor the eventual groundwater pollution before widespread pollution has occurred. The statement by the landfill proponent, that the landfill is not situated over an aquifer, is misleading in that the area under the landfill is hydraulically connected to a high value aquifer that will be polluted by landfill leachate when the liner system eventually fails.

Another significant problem with the proposed landfill is that there is only assured postclosure funding for 30 years after landfill closure. Since the wastes in the landfill will be a threat effectively forever, the County could ultimately have to pay for the clean up of the polluted groundwater that will occur at this landfill.

Overall, because of its treat to groundwater resources, this landfill should not be permitted. I recommend that the Board support Staff Recommendation **2.** Adopt a motion indicating the Water Authority's support of Proposition B. This alternative would oppose the construction of a landfill at Gregory Canyon.

For additional information on these issues please review my website, <u>www.gfredlee.com</u>. I have attached a summary of my expertise and experience pertinent to evaluating the potential for the Gregory Canyon Landfill to eventually pollute groundwater. Please contact me if there are questions on these comments.

G. Fred Lee, PhD, DEE

Dr. G. Fred Lee, PE (TX), DEE

Expertise and Experience in Hazardous Chemical Site and Municipal/Industrial Landfill Impact Assessment/Management

Dr. G. Fred Lee's work on hazardous chemical site and municipal/industrial landfill impact assessment began in the mid-1950s while he was an undergraduate student in environmental health sciences at San Jose State College in San Jose, California. His course and field work involved review of municipal and industrial solid waste landfill impacts on public health and the environment.

He obtained a Master of Science in Public Health degree from the University of North Carolina, Chapel Hill, in 1957. The focus of his masters degree work was on water quality evaluation and management with respect to public health and environmental protection from chemical constituents and pathogenic organisms.

Dr. Lee obtained a PhD degree specializing in environmental engineering from Harvard University in 1960. As part of this degree work he obtained further formal education in the fate, effects and significance and the development of control programs for chemical constituents in surface and ground water systems. An area of specialization during his PhD work was aquatic chemistry, which focused on the transport, fate and transformations of chemical constituents in aquatic (surface and ground water) and terrestrial systems as well as in waste management facilities.

For a 30-year period, he held university graduate-level teaching and research positions in departments of civil and environmental engineering at several major United States universities, including the University of Wisconsin-Madison, University of Texas at Dallas, and Colorado State University. During this period he taught graduate-level environmental engineering courses in water and wastewater analysis, water and wastewater treatment plant design, surface and ground water quality evaluation and management, and solid and hazardous waste management. He has published over 850 professional papers and reports on his research results and professional experience. His research included, beginning in the 1970s, the first work done on the impacts of organics on clay liners for landfills and waste piles/lagoons.

His work on the impacts of hazardous chemical site and municipal/industrial solid waste landfills began in the 1960s when, while directing the Water Chemistry Program in the Department of Civil and Environmental Engineering at the University of Wisconsin-Madison, he became involved in the review of the impacts of municipal solid waste landfills on groundwater quality.

In the 1970s, while he was Director of the Center for Environmental Studies at the University of Texas at Dallas, he was involved in the review of a number of municipal solid and industrial (hazardous) waste landfill situations, focusing on the impacts of releases from the landfill on public health and the environment.

In the early 1980s while holding a professorship in Civil and Environmental Engineering at Colorado State University, he served as an advisor to the town of Brush, Colorado, on the potential impacts of a proposed hazardous waste landfill on the groundwater resources of interest to the community. Based on this work, he published a paper in the Journal of the American Water Works Association discussing the ultimate failure of the liner systems proposed for that landfill in preventing groundwater pollution by landfill leachate. In 1984 this paper was judged by the Water Resources Division of the American Water Works Association as the best paper published in the journal for that year.

In the 1980s, he conducted a comprehensive review of the properties of HDPE liners of the type being used today for lining municipal solid waste and hazardous waste landfills with respect to their compatibility with landfill leachate and their expected performance in containing waste-derived constituents for as long as the waste will be a threat.

In the 1980s while he held the positions of Director of the Site Assessment and Remediation Division of a multi-university consortium hazardous waste research center and Distinguished Professor of Civil and Environmental Engineering at the New Jersey Institute of Technology, he was involved in numerous situations concerning the impact of landfilling of municipal solid waste on public health and the environment. He has served as an advisor to the states of California, Michigan, New Jersey and Texas on solid waste regulations and management. He was involved in evaluating the potential threat of uranium waste solids from radium watch dial painting on groundwater quality when disposed of by burial in a gravel pit. The public in the area of this state of New Jersey proposed disposal site objected to the State's proposed approach. Dr. Lee provided testimony in litigation, which caused the judge reviewing this matter to prohibit the State from proceeding with the disposal of uranium/radium waste at the proposed location.

Beginning in the 1960s, while a full-time university professor, Dr. Lee was a parttime private consultant to governmental agencies, industry and environmental groups on water quality and solid and hazardous waste and mining management issues. His work included evaluating the impacts of a number of municipal and industrial solid waste landfills. Much of this work was done on behalf of water utilities, governmental agencies and public interest groups who were concerned about the impacts of a proposed landfill on their groundwater resources, public health and the environment.

In 1989, he retired after 30 years of graduate-level university teaching and research and expanded the part-time consulting that he had been doing with governmental agencies, industry and community and environmental groups into a full-time activity. A principal area of his work since then has been assisting water utilities, municipalities, industry, community and environmental groups, agricultural interests and others in evaluating the potential public health and environmental impacts of proposed or existing hazardous, as well as municipal solid waste landfills. He has been involved in the review of approximately 65 different landfills and waste piles (tailings) in various parts of the United States and in other countries. Dr. Anne Jones-Lee (his wife) and he have published extensively on the issues that should be considered in developing new or expanded municipal solid waste and hazardous waste landfills in order to protect the health, groundwater resources, environment and interests of those within the sphere of influence of the landfill. Their over 50 professional papers and reports on landfilling issues provide guidance not only on the problems of today's minimum US EPA Subtitle D landfills, but also on how landfilling of nonrecyclable wastes can and should take place to protect public health, groundwater resources, the environment, and the interests of those within the sphere of influence of a landfill/waste management unit. They make many of their publications available as downloadable files from their web site, www.gfredlee.com.

Their work on landfill issues has particular relevance to Superfund site remediation, since regulatory agencies often propose to perform site remediation by developing an onsite landfill or capping waste materials that are present at the Superfund site. The proposed approach frequently falls short of providing true long-term health and environmental protection from the landfilled/ capped waste.

In the early 1990s, Dr. Lee was appointed to a California Environmental Protection Agency's Comparative Risk Project Human Health Subcommittee that reviewed the public health hazards of chemicals in California's air and water. In connection with this activity, Dr. Jones-Lee and he developed a report, "Impact of Municipal and Industrial Non-Hazardous Waste Landfills on Public Health and the Environment: An Overview," that served as a basis for the human health advisory committee to assess public health impacts of municipal landfills.

In addition to teaching and serving as a consultant in environmental engineering for over 40 years, Dr. Lee is a registered professional engineer in the state of Texas and a Diplomate in the American Academy of Environmental Engineers (AAEE). The latter recognizes his leadership roles in the environmental engineering field. He has served as the chief examiner for the AAEE in north-central California and New Jersey, where he has been responsible for administering examinations for professional engineers with extensive experience and expertise in various aspects of environmental engineering, including solid and hazardous waste management.

His work on landfill impacts has included developing and presenting several twoday short-courses devoted to landfills and groundwater quality protection issues. These courses have been presented through the American Society of Civil Engineers, the American Water Resources Association, and the National Ground Water Association in several United States cities, including New York, Atlanta, Seattle and Chicago, and the University of California Extension Programs at several of the UC campuses, as well as through other groups. He has also participated in a mine waste management short-course organized by the University of Wisconsin-Madison and the University of Nevada. He has been and continues to be an American Chemical Society tour speaker, where he is invited to lecture on landfills and groundwater quality protection issues, as well as domestic water supply water quality issues throughout the United States.

SUMMARY BIOGRAPHICAL INFORMATION

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EDUCATION

Ph.D.	Environmental Engineering & Environmental Science, Harvard University,
	Cambridge, Mass. 1960
M.S.P.H.	Environmental Science-Environmental Chemistry, School of Public Health,
	University of North Carolina, Chapel Hill, NC 1957

B.A. Environmental Health Science, San Jose State College, San Jose, CA 1955

ACADEMIC AND PROFESSIONAL EXPERIENCE

Current Position:

Consultant, President, G. Fred Lee and Associates

Previous Positions:

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Distinguished Professor, Civil and Environmental Engineering, New Jersey Institute of Technology, Newark, NJ, 1984-89

Senior Consulting Engineer, EBASCO-Envirosphere, Lyndhurst, NJ (part-time), 1988-

- Coordinator, Estuarine and Marine Water Quality Management Program, NJ Marine Sciences Consortium Sea Grant Program, 1986
- Director, Site Assessment and Remedial Action Division, Industry, Cooperative Center for Research in Hazardous and Toxic Substances, New Jersey Institute of Technology et al., Newark, NJ, 1984-1987

Professor, Department of Civil and Environmental Engineering, Texas Tech University,

1982-1984

Professor, Environmental Engineering, Colorado State University, 1978-1982

- Professor, Environmental Engineering & Sciences; Director, Center of Environmental Studies, University of Texas at Dallas, 1973-1978
- Professor of Water Chemistry, Department of Civil & Environmental Engineering, University of Wisconsin-Madison, 1961-1973

Registered Professional Engineer, State of Texas, Registration No. 39906

Diplomate, American Academy of Environmental Engineers, Certificate No. 0701

PUBLICATIONS AND AREAS OF ACTIVITY

Published over 950 professional papers, chapters in books, professional reports, and similar materials. The topics covered include:

- Studies on sources, significance, fate and the development of control programs for chemicals in aquatic and terrestrial systems.
- \$ Analytical methods for chemical contaminants in fresh and marine waters.
- \$ Landfills and groundwater quality protection issues.
- \$ Impact of landfills on public health and environment.
- Environmental impact and management of various types of wastewater discharges including municipal, mining, electric generating stations, domestic and industrial wastes, paper and steel mill, refinery wastewaters, etc.
 Stormwater runoff water quality evaluation and BMP development for urban areas and highways.
- Eutrophication causes and control, groundwater quality impact of land disposal of municipal and industrial wastes, environmental impact of dredging and dredged material disposal, water quality modeling, hazard assessment for new and existing chemicals, water quality and sediment criteria and standards, water supply water quality, assessment of actual environmental impact of chemical contaminants on water quality.

LECTURES

Presented over 750 lectures at professional society meetings, universities, and to professional and public groups.

GRANTS AND AWARDS

Principal investigator for over six million dollars of contract and grant research in the water quality and solid and hazardous waste management field.

GRADUATE WORK CONDUCTED UNDER SUPERVISION OF G. FRED LEE

Over 90 M.S. theses and Ph.D. dissertations have been completed under the supervision of Dr. Lee.

ADVISORY ACTIVITIES

Consultant to numerous international, national and regional governmental agencies, community and environmental groups and industries.

Municipal Solid Waste Landfills and Groundwater Quality Protection Issues Publications

Drs. G. Fred Lee and Anne Jones-Lee have prepared several papers and reports on various aspects of municipal solid waste (MSW) management and hazardous waste management by landfilling, groundwater quality protection issues, as well as other issues of concern to those within a sphere of influence of a landfill. These materials provide an overview of the key problems associated with landfilling of MSW and hazardous waste utilizing lined "dry tomb" landfills and suggest alternative approaches for MSW management that will not lead to groundwater pollution by landfill leachate and protect the health and interests of those within the sphere of influence of a landfill. Copies of many of these papers and reports are available as downloadable files from Drs. G. Fred Lee's and Anne Jones-Lee's web page (http://www.gfredlee.com). Recent papers and reports on landfilling issues are listed below. Copies of the papers and reports listed below as well as a complete list of publications on this and related topics are available upon request.

Overall Problems with "Dry Tomb" Landfills

Lee, G. F. and Jones-Lee, A., "Overview of Subtitle D Landfill Design, Operation, Closure and Postclosure Care Relative to Providing Public Health and Environmental Protection for as Long as the Wastes in the Landfill will be a Threat," Report of G. Fred Lee & Associates, El Macero, CA (2004). http://www.gfredlee.com/LFoverviewMSW.pdf

Lee, G. F., "Comments on GeoSyntec Consultants' Draft Report 'Landfill Facility Compliance Study Task 8 Report-Summary of Findings and Comprehensive Recommendations,' Dated May 2004," Comments Submitted to CIWMB by G. Fred Lee & Associates, El Macero, CA, June (2004). http://www.members.aol.com/duklee2307/GeoSyntecTask8-Comments.pdf

Lee, G. F., "Comments on GeoSyntec Consultants' Draft Report 'Landfill Facility Compliance Study Task 8 Report-Summary of Findings and Comprehensive Recommendations,' Dated May 2004," Comments Submitted to CIWMB by G. Fred Lee & Associates, El Macero, CA, June (2004). http://www.members.aol.com/duklee2307/GeoSyntecTask8-Comments.pdf

Lee, G. F., "Comments on the California Integrated Waste Management Board Landfill Facility Compliance Study," Comments Submitted to CIWMB by G. Fred Lee & Associates, El Macero, CA, November 2003. http://www.gfredlee.com/CIWMBcomments11-20-03.pdf

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Lee, G. F., "Deficiencies in the US EPA's Characterization of the Protection Provided by Subtitle D Landfilling of MSW," Report of G. Fred Lee & Associates, El Macero, CA, March (2003). http://www.gfredlee.com/USEPApropaganda.pdf

Lee, G. F. and Jones-Lee, A., "Deficiencies in Subtitle D Landfill Liner Failure and Groundwater Pollution Monitoring," Presented at the NWQMC National Conference "Monitoring: Critical Foundations to Protect Our Waters," US Environmental Protection Agency, Washington, D.C., July (1998). http://www.gfredlee.com/nwqmcl.html

Lee, G. F. and Jones-Lee, A., "Deficiencies in US EPA Subtitle D Landfills in Protecting Groundwater Quality for as Long as MSW is a Threat: Recommended Alternative Approaches," Report of G. Fred Lee & Associates, El Macero, CA (1997).

Lee, G. F., "Comments on 'The Effectiveness of Municipal Solid Waste Landfills in Controlling Releases of Heavy Metals to the Environment," Report of G. Fred Lee & Associates, El Macero, CA, July (2004). http://www.members.aol.com/duklee2307/SWANA-heavymetals-comments.pdf

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Lee, G. F. and Jones-Lee, A., "Deficiencies in US EPA Subtitle D Landfills in Protecting Groundwater Quality for as Long as MSW is a Threat: Recommended Alternative Approaches," Report of G. Fred Lee & Associates, El Macero, CA (1997).

Lee, G. F. and Jones-Lee, A., "Developing Landfills that Protect People: The True Costs," *MSW Management* <u>7</u>(6):18-23, Nov/Dec (1997).

Liner Failure Issues

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Lee, G. F. and Jones, R. A., "Municipal Solid Waste Management in Lined, 'Dry Tomb' Landfills: A Technologically Flawed Approach for Protection of Groundwater Quality," Report of G. Fred Lee & Associates, El Macero, CA, 68pp (1992).

Lee, G. F. and Jones, R. A., "Geosynthetic Liner Systems for Municipal Solid Waste Landfills: An Inadequate Technology for Protection of Groundwater Quality?" *Waste Management & Research* <u>11</u>:354-360 (1993).

Lee, G. F., "Comments on Tisinger and Giroud 'The Durability of HDPE Geomembranes," Letter to the Editor, Geotechnical Fabrics Report, Minneapolis, MN Submitted by G. Fred Lee & Associates, El Macero, CA, 4pp (1994).

Groundwater Pollution by Leachate

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Lee, G. F. and Jones-Lee, A., "Landfill Leachate Management: Overview of Issues," *MSW Management* <u>6</u>:18-23 (1996).

Groundwater Monitoring

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Permitting of Landfills

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Landfill Mining

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NIMBY Issues

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Arizona	G. Fred Lee and Anne Jones-Lee Verde Valley - Copper Tailings Pile Closure
(State Landfilling Regulations)	Southpoint Landfill, Mobile, AZ
	Colusa County - CERRS Landfill
	San Gabriel Valley - Azusa Landfill
	City of Industry - Puente Hills Landfill
	North San Diego County, 3 landfills
	San Diego County - Gregory Canyon Landfill
	El Dorado County Landfill
	Yolo County Landfill
	Half Moon Bay - Apanolio Landfill
	Pittsburg - Keller Canyon Landfill
	Chuckwalla Valley - Eagle Mountain Landfill
California	Barstow - Hidden Valley
(State Landfilling Regulations)	Broadwell Hazardous Waste Landfills
	Cadiz - Bolo Station-Rail Cycle Landfill
	University of California-Davis Landfills (4)
	San Marcos - San Marcos Landfill
	Placer County - Western Regional Sanitary Landfill
	Placer County – Turkey Carcass Disposal Pits
	Imperial County - Mesquite Landfill
	Los Angeles County - Calabasas Landfill
	Los Angeles County – Palos Verdes Landfill
	Contra Costa County – Concord Naval Weapons Station Tidal Area Landfill
l	Last Chance/Brush - Hazardous Waste Landfill
Colorado	Denver - Lowry Hazardous Waste Landfill
(State Landfilling Regulations)	Telluride/Idarado Mine Tailings
Florida	
(State Landfilling Regulations)	Alachua County Landfill
Illinois	Crystal Lake - McHenry County Landfill
(State Landfilling Regulations)	Wayne County Landfill
Indiana	Posey County Landfill
(State Landfilling Regulations)	New Haven-Adams Center Landfill (Hazardous Waste)
Michigan	Menominee Township - Landfill
(State Landfilling Regulations)	Ypsilanti- Waste Disposal Inc. (Hazardous Waste - PCB's)
	Reserve Mining Co., Silver Bay - taconite tailings
Minnesota	Wright County - Superior FCR Landfill
Missouri	Jefferson County - Bob's Home Service Hazardous Waste Landfill
New Jersey	Meadowlands – Landfill
(State Landfilling Regulations)	Fort Dix Landfill
	Scotch Plains Leaf Dump
	Staten Island - Fresh Kills Landfill,
New York	Niagara Falls - Hazardous Waste Landfill,
	New York City – Ferry Point Landfill
	Clermont County - BFI/CECOS Hazardous Waste Landfill,
Ohio	Huber Heights - Taylorville Road Hardfill Landfill

Landfills Evaluated by G. Fred Lee and Anne Jones-Lee

Pennsylvania	Pottstown Landfill Closure Committee – Pottstown, PA			
Rhode Island	Richmond – Landfill			
South Carolina	Spartanburg - Palmetto Landfill			
Texas (State Landfilling Regulations)	Dallas/Sachse – Landfill Fort Worth - Acme Brick Hazardous Waste Landfill City of Dallas - Jim Miller Road Landfill			
Vermont	Coventry, Vermont – Coventry Landfill			
Washington (State Landfilling Regulations)	Tacoma - 304th and Meridian Landfill			
Wisconsin	Madison and Wausau Landfills			
INTERNATIONAL LANDFILLS				
Belize	Mile 27 Landfill			
Ontario, Canada (Prov. Landfilling Regulations)	Greater Toronto Area - Landfill Siting Issues Kirkland Lake - Adams Mine Site Landfill Pembroke - Cott Solid Waste Disposal Areas			
Manitoba, Canada (Prov. Landfilling Regulations)	Winnipeg Area - Rosser Landfill			
New Brunswick, Canada (Prov. Landfilling Regulations)	St. John's - Crane Mountain Landfill			
England	Mercyside Waste Disposal Bootle Landfill			
Hong Kong	Three New MSW Landfills			
Ireland	Bottlehill Landfill, County Cork Central Waste Management Facility, Ballyduff, County Clare			
Korea	Yukong Gas Co Hazardous Waste Landfill			
Mexico (Haz. Waste Landfilling Regulations	San Luis Pontosi - Hazardous Waste Landfill			
New Zealand	North Waikato Regional Landfill			
Puerto Rico	Salinas - Campo Sur Landfill			

Surface and Groundwater Quality Evaluation and Management and Municipal Solid & Industrial Hazardous Waste Landfills

http://www.gfredlee.com

Dr. G. Fred Lee and Dr. Anne Jones-Lee have prepared professional papers and reports on the various areas in which they are active in research and consulting including domestic water supply water quality, water and wastewater treatment, water pollution control, and the evaluation and management of the impacts of solid and hazardous wastes. Publications are available in the following areas:

Landfills and Groundwater Quality Protection Water Quality Evaluation and Management for Wastewater Discharges Stormwater Runoff, Ambient Waters and Pesticide Water Quality Management Issues, TMDL Development, Water Quality Criteria/Standards Development and Implementation Impact of Hazardous Chemicals -- Superfund LEHR Superfund Site Reports to DSCSOC Lava Cap Mine Superfund Site reports to SYRCL Smith Canal Contaminated Sediment -- Aquafund, BPTCP, Sediment Quality Criteria Domestic Water Supply Water Quality Excessive Fertilization/Eutrophication, Nutrient Criteria Reuse of Reclaimed Wastewaters Watershed Based Water Quality Management Programs: Sacramento River Watershed Program Delta -- CALFED Program Upper Newport Bay Watershed Program San Joaquin River Watershed DO and OP Pesticide TMDL Programs

Stormwater Runoff Water Quality Science/Engineering Newsletter

G. Fred Lee & Associates was organized in the late 1960s to cover the part-time consulting activities that Dr. Lee undertook while a full-time university professor. In 1989, when Dr. Lee retired from 30 years of graduate-level teaching and research, he and Dr. Anne Jones-Lee, who was also a university professor, expanded G. Fred Lee & Associates into a full-time business activity. Examples of governmental agencies, consulting firms, citizens groups, industries and others for whom G. Fred Lee has served as an advisor include the following:

U.S. Environmental Protection Agency - Various Locations Vison, Elkins, Searls, Connally & Smith, Attorneys - Houston, TX International Joint Commission for the Great Lakes U.S. Public Health Service - Washington, DC Attorney General, State of Texas - Austin, TX Madison Metropolitan Sewerage District - Madison, WI Great Lakes Basin Commission - Windsor, Ontario U.S. Army Environmental Hygiene Agency - Edgewood Arsenal, MD City of Madison - Madison, WI Council on Environmental Quality - Washington, DC National Academies of Sciences and Engineering - Washington, DC Water Quality Board State of Texas - Austin, TX U.S. General Accounting Office - Washington, DC U.S. Army Corps of Engineers - Vicksburg, MS Tennessee Valley Authority - Various locations in Tennessee Valley National Oceanic & Atmospheric Administration - Various locations Organization for Economic Cooperation & Development - Paris Attorney General, State of Illinois - Chicago, IL State of Texas Hazardous Waste Legislative Committee - Austin State of New Mexico Environmental Improvement Agency - Santa Fe New York District Corps of Engineers - New York, NY San Francisco District Corps of Engineers - San Francisco, CA Wisconsin Electric Power Company - Milwaukee, WI WAPORA - Washington, DC Reserve Mining Company - Silver Bay, MN United Engineers - Philadelphia, PA Automated Environmental Systems - Long Island, NY Procter & Gamble Company - Cincinnati, OH Inland Steel Development Company - Chicago, IL Kennecott Copper Corporation - Salt Lake City, UT U.S. Steel Corporation - Pittsburgh, PA Nekoosa Edwards, Inc. - WI Zimpro, Inc. - Rothschild, WI FMC Corporation - Philadelphia, PA Acme Brick Company - Forth Worth, TX Monsanto Chemical Company - St. Louis, MO Gould, Inc. - Cleveland, OH Illinois Petroleum Council - Chicago, IL Inland Steel Corporation - Chicago, IL Industrial Biotest Laboratories - Northbrook, IL Wisconsin Pulp & Paper Industries - Upper Fox Valley, WI

Thilmany Pulp & Paper Company - Green Bay, WI Chicago Park District - Chicago, IL Nalco Chemical Company - Chicago, IL Boise Cascade Development Company - Chicago, IL Foley & Lardner, Attorneys - Milwaukee, WI Timken & Lonsdorf, Attorneys - Wausau, WI Strasburger, Price, Kelton, Martin & Unis, Attorneys - Dallas, TX Rooks, Pitts, Fullagar & Poust, Attorneys - Chicago, IL Jones, Day, Cockley & Reaves, Attorneys - Cleveland, OH Sullivan, Hanft, Hastings, Fride & O'Brien, Attorneys - Duluth, MN Hinshaw, Culbertson, Molemann, Hoban & Fuller, Attnys - Chicago, IL Colorado Springs - Colorado Springs, CO Mayer, Brown & Platt, Attorneys - Chicago, IL Pueblo Area Council of Governments - Pueblo, CO Platte River Power Authority - Fort Collins, CO Linguist & Vennum, Attorneys - Minneapolis, MN Norfolk District Corps of Engineers - Norfolk, VA Spanish Ministry of Public Works - Madrid, Spain The Netherlands - Rijkswaterstaat - Amsterdam, The Netherlands U.S. Department of Energy - Various locations in US King Industries - Norwalk, CT Attorney General, State of Florida - Tallahassee, FL State of Colorado Governor's Office - Denver, CO Cities of Fort Collins, Longmont, and Loveland - CO E.I. DuPont - Wilmington, DE Allied Chemical Company - Morristown, NJ Outboard Marine - Waukegan, IL Amoco Oil Company - Denver, CO Appalachian Timber Services - Charleston, WV Mission Viejo Development - Denver, CO Fisher, Brown, Huddleston & Gun, Attorneys - Fort Collins, CO Tom Florczak, Attorney - Colorado Springs, CO Wastewater Authority - Burlington, VT Tad Foster, Attorney - Pueblo, CO Holmes, Roberts & Owen, Attorneys - Denver, CO Center for Energy and Environment Research - Puerto Rico City of Brush - Brush, CO Rock Island District Corps of Engineers - Rock Island, IL Santo Domingo Water Authority - Dominican Republic Ministry of Public Works and Environment - Buenos Aires, Argentina Neville Chemical - Pittsburgh, PA Fike Chemical Company - Huntington, WV Stauffer Chemical Company - Richmond, CA Adolph Coors Company - Golden, CO Water Research Commission - South Africa Grinnell Fire Protection Systems - Lubbock, TX

City of Lubbock Parks Department - Lubbock, TX National Planning Council - Amman, Jordan City of Olathe - Olathe, KS City of Lubbock - Lubbock, TX US AID - Amman, Jordan Buffalo Springs Lake Improvement Association - Buffalo Springs, TX Union Carbide Company - Charleston, WV Canadian River Municipal Water Authority - Lake Meredith, TX Mobil Chemical Company - Pasadena, TX Unilever Ltd. - Rotterdam, The Netherlands Brazos River Authority - Waco, TX U.S. Army Construction Engineering Research Laboratory - Champaign, IL James Yoho, Attorney - Danville, IL Zukowsky, Rogers & Flood, Attorneys - Crystal Lake, IL State of California Water Resources Control Board - Sacramento Public Service Electric & Gas - Newark, NJ Health Officer - Boonton Township, NJ Scotland & Robeson Counties - Lumberton, NC International Business Machines Corporation - White Plains, NY Newark Watershed Conservation & Development Authority - NJ State of Vermont Planning Agency - Montpelier, VT CDM, Inc. - Edison, NJ Attorney General, State of North Carolina - Raleigh, NC City of Vernon - Vernon, NJ Ebasco Services - Lyndhurst, NJ Kraft, Inc. - Northbrook IL, with work in Canada, FL and MN USSR Academy of Sciences - Moscow, USSR Tillinghast, Collins & Graham, Attorneys - Providence, RI City of Richmond, RI Idarado Mining Company - Telluride, CO Levy, Angstreich, Attorneys - Cherry Hill, NJ Newport City Development - Jersey City, NJ Orbe, Nugent & Collins, Attorneys - Ridgewood, NJ Schmeltzer, Aptaker & Shepard, Attorneys - Washington, DC CP Chemical - Sewaren, NJ Dan Walsh, Attorney - Carson City, NJ William Cody Kelly - Lake Tahoe, NV NJ Department of Environmental Protection - Trenton, NJ Hufstedler, Miller, Kaus & Beardsley, Attorneys - Los Angeles, CA Main San Gabriel Basin Watermaster - CA Metropolitan Water District of Southern California - Los Angeles, CA San Diego Unified Port District - San Diego, CA Delta Wetlands - CA Simpson Paper Company - Humboldt County, CA City of Sacramento - CA Northern California Legal Services - Sacramento, CA

Rocketdyne - Canoga Park, CA RR&C Development Co. - City of Industry, CA American Dental Association - Chicago, IL Emerald Environmental - Phoenix, AZ Clayton Chemical Company - Sauget, IL Stanford Ranch - Rocklin, CA Public Liaison Committee - Kirkland Lake, Ontario Miller Brewing Company, Los Angeles, CA ASARCO Inc., Tacoma, WA CALAMCO, Stockton, CA Yunkong Gas Company, South Korea Sutherlands, Pembroke, Ontario Silverado Constructors, Irvine, CA Agricultural Interests in Puerto Rico City of Winnipeg, Manitoba Strain Orchards, Colusa, CA Davis South Campus Superfund Oversight Committee, Davis, CA Monterrey County, California Housing Authority, Salinas, CA CROWD, Tacoma, WA Newport Beach, CA SOLVE, Phoenix, AZ Sports Fishing Alliance, San Francisco, CA Caltrans (California Department of Transportation) Citizens Group near St. John's, New Brunswick Colonna Shipyards, Norfolk, VA Clermont County, OH Wright County, MN Waikato River Protection Society, New Zealand Drobac & Drobac, Attorneys, Santa Cruz, CA Phelps Dunbar, L.L.P., Houston, TX Walters Williams & Co, New Zealand Environmental Protection Department, Hong Kong NYPRIG New York City, NY DeltaKeeper, Stockton City of Stockton, CA Central Valley Regional Water Quality Board, Sacramento, CA Carson Harbor Village, Carson, CA Sanitary District of Hammond, IN South Bay CARES, Los Angeles, CA Memphremagog Regional Council, Quebec, CANADA Mobile, AZ