25 AUG '80
San Francisco

Meeting with SWRCB on Class II application
Some problems from Clint Whitney. Ask to hold application.
Meeting next Wednesday with Board

SWRCB
1) How wide is exemption?
2) How much migration occurs?
3) Completeness of data to characterize aquifer?
4) Board concerned about not "degrading" any aquifer

How much of "extra" work proposed by DOG is needed?
beyond what EPA requires - 25% of inspections
How much review has gone into DOG exempted aquifer?
Problem of EPA exempting but State does not want
agricultural or industrial quality waters degraded
and issue waste discharge limit
Can any waste be injected into an exempted aquifer?
Concerned with aquifers over 10000 TDS
Technologically or economically feasible?

Brought in copy of DOG MOA

How about requiring injector to inject into same formation
but in a different area outside "exempted area"? This
would prevent injection into better aquifers

Any suggestion on "migration"? What is to prevent it?