

From: [Reisch, Scott H.](#)
To: [Lahontan](#)
Cc: [Grey, Brian@Waterboards](#); [Miller, Matthew](#)
Subject: Lake Tahoe Laundry Works proposed CAO Comments - Fox Capital Management Corporation
Date: Monday, September 19, 2022 4:04:31 PM
Attachments: [Fox's Comments to Regional Board's Proposed Order 9.19.22.pdf](#)
[Exhibit A.pdf](#)
[Exhibit B.pdf](#)
[Exhibit C.pdf](#)
[Exhibit D.pdf](#)

EXTERNAL:

Dear Ms. Fleshman,

Attached please find comments on the proposed Cleanup and Abatement Order for the Lake Tahoe Laundry Works (LTLW) site located at 1024 Lake Tahoe Boulevard in South Lake Tahoe, California (GeoTracker Global Id No. SL0601754315) prepared on behalf of Fox Capital Management Corporation. As discussed with Brian Grey, we will be submitting a duplicate of these comments plus references mentioned in my letter via a collabspace space sharedrive and then we will turn to uploading the entire package using the FTP link that Brian provided on Friday. (Brian, since you already have access to collabspace, I am told that all you will need to do is “refresh” and you will have access to the documents thereafter).

If you have any questions, please contact me via email or at 303-899-7355.

Regards,
Scott

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Hogan Lovells US LLP
1601 Wewatta Street
Suite 900
Denver, CO 80202
T +1 303 899 7355
F +1 303 899 7333
www.hoganlovells.com
scott.reisch@hoganlovells.com

September 19, 2022

By Electronic Mail

Katrina Fleshman, Executive Assistant
Lahontan Regional Water Quality Control Board
2501 Lake Tahoe Boulevard
South Lake Tahoe, California 96150
lahontan@waterboards.ca.gov

Re: Response to Cleanup and Abatement Order R6T – 2022 – (Proposed) for Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California

Dear Ms. Fleshman,

On behalf of Fox Capital Management Corporation (“Fox”), we are pleased to provide these comments to the California Regional Water Quality Control Board, Lahontan Region (“Regional Board”) on the Regional Board’s proposed Cleanup and Abatement Order No. R6T-2022-PROP, dated June 16, 2022 (the “Proposed Order”), for the Former Lake Tahoe Laundry Works located at 1024 Lake Tahoe Boulevard, South Lake Tahoe, California (“LTLW”).

Fox’s comments consist of the legal analysis set forth below and the references cited herein (listed on Exhibit A), the attached technical comments (“Technical Comments”) (Exhibit B) jointly prepared by EKI Environment & Water, Inc. (formerly Erler & Kalinowski, Inc.) (“EKI”) and PES Environmental, Inc., an NV5 company (“PES”), and the enclosed markup of the Proposed Order (Exhibit C).¹ All sources referenced in these comments are enumerated in Exhibit A and are included on a “collabspace” share drive, a link to which has been sent to lahontan@waterboards.ca.gov and to Brian Grey under separate cover. As requested by Mr. Grey on Friday, September 16, for the Regional Board’s convenience, we also plan to upload the references on the FTP link Mr. Grey provided by email on Friday afternoon.

¹ The markup in Exhibit C identifies some (but not all) of the statements in the Proposed Order that warrant correction or clarification. Comments included in Exhibit C are in addition to (and in no way limit) the comments provided in this letter and Exhibit B.

In addition to submitting these written comments, Fox requests the opportunity to meet with the Regional Board in person before the Regional Board issues a final order in this matter. If finalized in its current form, the Proposed Order will inevitably lead to yet another round of costly litigation. Consistent with its long history of collaborating with the Regional Board, Fox respectfully suggests that the parties instead explore alternative approaches to addressing the important issues raised by the Proposed Order.

I. EXECUTIVE SUMMARY

If finalized, the Proposed Order would require Fox and three other parties to investigate, abate, and remediate the effects of a large area of groundwater contamination in South Lake Tahoe. The Regional Board contends that Fox is liable for this work under Sections 13304 and 13267 of the California Water Code (“Water Code”) because it is the former general partner of a defunct partnership, Century Properties Equity Fund 73 (“Century 73”). Between September 1974 and December 1985, Century 73 owned the South Y Shopping Center (“South Y Shopping Center”), within which the LTLW operated a laundromat. Before Century 73’s ownership and continuing until 1979 or 1980, the LTLW owned washing machines, dryers, and a coin-operated dry cleaning unit that used a common solvent known as perchloroethylene (“PCE”). In 2003 and thereafter, PCE was detected in soil, soil vapor, and groundwater beneath the South Y Shopping Center.

The Regional Board does not contend that Fox ever owned the LTLW or the South Y Shopping Center, that it caused any pollution at either property, or that it actually knew in the 1970s of any PCE discharges at the LTLW. Nevertheless, and notwithstanding the fact that Fox has already incurred millions of dollars complying with a prior Regional Board order that a California court ultimately invalidated, the Regional Board proposes to require Fox to undertake an astonishingly broad scope of work costing many millions of dollars to address a large area of PCE contamination occupied by over one hundred businesses that are known or suspected to have discharged PCE.

The Proposed Order is improper in numerous respects. *First*, the Proposed Order essentially ignores the precedent established by the Court of Appeal’s decision in *United Artists Theatre Circuit, Inc. v. Reg’l Water Quality Control Bd.*, 42 Cal. App. 5th 851 (2019). The Court of Appeal held in that case that a prior landlord cannot be liable for “permitting” a discharge under Section 13304 of the Water Code unless it knew or should have known of the reasonable possibility of a discharge that would result in a groundwater contamination nuisance. Disregarding that holding, the Regional Board impermissibly seeks to impose liability on Fox because it allegedly “knew or should have known” of “the general activity” that “created a reasonable possibility of a discharge into waters of the state that could create or threaten to create a condition of pollution or nuisance.”

Second, the Proposed Order attempts to hold Fox liable without proving by a preponderance of the evidence that Century 73 or Fox should have known that the operation of the LTLW

laundromat created a reasonable possibility of a discharge that could create a groundwater contamination nuisance. As it did when it issued a prior order that was invalidated by the courts, the Regional Board eschews reliance on site-specific evidence, contemporaneous documents or the testimony of percipient witnesses that operated the LTLW, and instead bases the Proposed Order on evidence adduced in a different case regarding a different site. The cherry-picked record from that case reflects that in the 1970s, not even industry insiders—let alone the general partner of a landlord of the owner of a coin-operated dry cleaning machine—knew of a reasonable possibility of a groundwater contamination nuisance resulting from discharges from a coin-operated dry cleaning unit. The other evidence relied upon by the Regional Board is to the same effect. Put simply, none of the documents cited by the Regional Board overcome the overwhelming evidence that dry cleaner contamination was not commonly known (if known at all) in the 1970s, even by California’s regional boards.

Third, the Proposed Order fails because the Regional Board has not shown, as Regional Board precedents interpreting Section 13304 require, that Century 73 or Fox could have prevented the discharge at issue. The evidence in this case indicates that a discharge of PCE occurred before Century 73 acquired the property, and case law makes clear that neither Century 73 nor Fox had a duty to take extraordinary measures (such as a subsurface investigation at a time when such investigations were largely unheard of) to inspect a tenants activities.

Fourth, the Proposed Order improperly seeks to impose liability on Fox as the general partner of Century 73, even though any such liability lapsed many years ago pursuant to California law governing the dissolution of partnerships.

Fifth, the Proposed Order improperly holds Fox liable for lawful pre-1981 acts, in direct contravention of Section 13304’s express provisions.

Sixth, the Proposed Order violates Section 13267 in multiple respects, including by requiring cleanup and abatement in addition to technical and monitoring reports, by seeking to impose liability on a party that has not discharged and is not suspecting of discharging waste into waters of the state, and by imposing requirements without properly assessing their costs and burdens.

Seventh, the Proposed Order’s expansive and draconian scope is unlawful. The Regional Board does not have authority to require Fox to investigate, cleanup and abate waste discharged by other parties. It cannot require Fox to access and destroy property Fox does not own. It has no authority to compel Fox’s consultants to adopt a conceptual site model that conflicts with known facts and sound science. It cannot dictate how Fox complies with an order when the statute expressly prohibits it from specifying “the manner in which compliance may be had.” And it cannot discard its prior conclusions without explaining why it changed its mind.

For all these reasons, and those set forth in the attachments hereto, the Proposed Order is unlawful and improper and should be withdrawn.

II. FACTUAL BACKGROUND

A. Site History

Connolly Development, Inc. (“Connolly Development”) developed the South Y Shopping Center property in 1972,² sold it to Century 73 in September 1974, and immediately leased it back for one year, with an option to extend the lease for two additional one-year periods.³ It is not known whether Connolly Development ever exercised that option. In December 1985, Century 73 sold the South Y Shopping Center to Interland Communities, Inc. (“Interland”), which transferred it to D.S. Lyddon (“Lyddon”) several days later.⁴ In October 1995, Lyddon transferred ownership to Seven Springs Limited Partnership (“Seven Springs”), which has owned the South Y Shopping Center ever since.⁵

In May 1972, 28 months before Century 73’s acquisition of the South Y Shopping Center, Connolly Development leased what became the LTLW tenant space to Robert and Bernice Prupas. The lease identified authorized uses of the premises as “[d]ry cleaning and coin-operated laundry, and purposes related thereto.”⁶ Multiple tenants or subtenants subsequently operated a laundromat at the South Y Shopping Center, including Bobby Page’s, Inc. (“Bobby Page’s”) (July 1972-December 1982), Kjell and Kerstin Hakansson (November 1973-July 1976), Leeroy and Mary Lou Baisley (July 1976-1996), Kim and Debra Welch (1996-1998), and David and Louzel Rogers (1998 to apparently 2011).⁷ According to the testimony of Mary Louise Baisley, who operated the LTLW with her husband from 1976-1996, the coin-operated machine was present at the LTLW when Mrs. Bailey and her husband purchased the laundry business in July 1976.⁸ The machine used PCE (sometimes called “perc”), which is a

² Memorandum from A. Bassak, Esq. to H. Singer and L. Dernback (Regional Board), South Y Center Chain of Title and Laundry Lease History (Mar. 11, 2004) (“South Y Center Chain of Title Memo”) at 1.

³ Memorandum of Lease between Century 73 and Connolly Development (Sept. 11, 1974).

⁴ Agreement for Purchase and Sale of South Y Shopping Center between Century 73 and Interland (Dec. 19, 1985); Grant Deed from Connolly Development (Grantor) to Century 73 (Grantee) (Sept. 11, 1974).

⁵ See Seven Springs’ Verified Petition for Writ of Administrative Mandamus (“Seven Springs’ Verified Petition”), *Seven Springs Ltd. Partnership v. Lahontan Reg’l Water Quality Control Bd.*, Case No. SC20180061 (Cal. Super. Ct., El Dorado Cty., Apr. 20, 2018) (“*Seven Springs v. Reg’l Bd.*”) ¶ 39; Seven Springs’ Opposition to Fox’s Motion Dismiss, *Seven Springs Ltd. P’ship v. Fox Cap. Mgmt. Corp.*, Case No. 2:07-CV-0142-LKK-GGH, 2007 WL 5324919, at *21 (E.D. Cal. Apr. 9, 2007) (“*Seven Springs v. Fox*”).

⁶ Lease Between Landlord Connolly Development and Tenants the Prupas (May 24, 1972) (“May 1972 Lease”) at § 7.1.

⁷ See South Y Center Chain of Title Memo at 1; May 1972 Lease; Addendum to Shopping Center Lease between Connolly Development Inc., as Landlord, and Robert, Berniece and Norman Prupas dba Bobby Page Cleaners, as Tenant, dated May 24, 1972 (July 5, 1972) (“July 1972 Lease Addendum”); Sublease of Kyell and Kersten Hakansson (Nov. 20, 1973) (“1973 Hakansson Sublease”); Assignment of Sublease to L.W. and Mary Lou Baisley (July 28, 1976) (“1976 Baisley Sublease”); Notice to Creditors, Escrow No. 203-96154 (Feb. 5, 1998); Proposed Order at 2 ¶ 3 (indicating that the LTLW closed in 2011).

⁸ Transcript of Deposition of Mary Louise Baisley (Apr. 13, 2007), *Seven Springs v. Fox* (“Baisley Dep.”) at 45.

colorless liquid that is difficult to see once it has been released into soil.⁹ Mrs. Baisley testified that she and her husband gave away the coin-operated unit for free in 1979 or 1980 because it was rarely used and unprofitable.¹⁰

Under the terms of the May 1972 lease, the LTLW tenants agreed to comply with the law, not to permit “any nuisance, or anything against public policy,” and not to use or permit use of the premises “for any purpose or use that is in violation of any of the laws, ordinances, regulations or rules of any public authority or organization at any time.”¹¹ The landlord had the right to enter the premises at any reasonable time for the purpose, among others, of inspecting the premises as required for complying with the law or any other lawful purpose.¹² Tenants agreed to obtain and maintain fire insurance, extended coverage insurance, and public liability insurance policies.¹³ Subsequent subtenants, like the Hakanssons and the Baisleys, agreed to be bound by the same terms through their subleases, which incorporated the obligations of the tenant in the lease.¹⁴

At a deposition taken by Seven Springs in 2007, Mrs. Baisley, who ran the business with her husband and was present at the LTLW on a daily basis,¹⁵ provided her detailed recollections of the coin-operated dry cleaning unit. In particular, Mrs. Baisley testified under oath that:

- the coin-operated dry cleaning machine was already present in the laundry when the Baisleys took over as tenants, and they kept that machine until approximately 1979.¹⁶
- the unit was rarely used, and, as a result, “most of the time [the Baisleys] kept the power to shut it [sic] off” and the Baisleys only refilled the machine’s PCE solvent “maybe once a year.”¹⁷
- the machine required virtually no maintenance, other than minor adjustments.¹⁸
- Mr. Baisley oversaw the delivery process, and he never mentioned any spills or other complications.¹⁹

⁹ *City of Modesto v. Dow Chem. Co.*, 19 Cal. App. 5th 130, 137 (2018), as modified on denial of reh’g (Feb. 6, 2018) (“*City of Modesto II*”).

¹⁰ Baisley Dep. at 43-46, 82-83.

¹¹ May 1972 Lease at § 7.5.

¹² *Id.* at § 15.

¹³ *Id.* at § 17.

¹⁴ See 1973 Hakansson Sublease at ¶ 4; 1976 Baisley Sublease at 1. Mr. Hakansson’s first name was spelled “Kyell,” rather than “Kjell,” in the 1973 Hakansson Sublease.

¹⁵ See, e.g., Baisley Dep. at 57-59.

¹⁶ *Id.* at 43-46.

¹⁷ *Id.* at 82-83.

¹⁸ *Id.* at 82-83.

¹⁹ *Id.* at 86-91.

- the parking area and driveway outside the laundry, where a truck would have delivered solvent, contained no “cracks or deficiencies” and was resealed every year or two.²⁰
- Mrs. Baisley observed no spills, leaks, or discharges of PCE solvent during the period in which the coin-operated dry cleaning unit was present, nor did her husband or anyone else ever report any to her.²¹
- The Baisleys gave away the machine in 1979 or 1980 (that is, they received no money for it) because “it was not making any money” and “wasn’t used that often.”²²
- The Baisleys replaced the dry cleaning unit with a vending machine.²³

Kerstin Hakansson, who, along with her husband, is the only other tenant to operate the LTLW while Century 73 owned South Y Shopping Center,²⁴ provided similar information in a handwritten declaration in 2017 and a sworn declaration in 2022. In particular, Mrs. Hakansson stated that she was unaware of “any spill,” whether “in the parking lot or anywhere on the property,” during the period that she and her husband operated the LTLW.²⁵

B. Investigation and Remediation of the LTLW

The Regional Board began investigating properties in the vicinity of the South Y Shopping Center following the discovery of PCE contamination in drinking water wells in South Lake Tahoe in 1989.²⁶ From 2003 to 2009, the Regional Board issued a series of investigative orders under Section 13267 to various alleged dischargers, which resulted in the submittal of certain work plans and technical reporting.²⁷

In 2007, Seven Springs, the current owner of the South Y Shopping Center, sued Fox in federal court under the federal Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 *et seq.* (“CERCLA”), and under an indemnity provision in the purchase

²⁰ *Id.* at 48-49.

²¹ *Id.* at 101, 137.

²² *Id.* at 82 (also describing the dry cleaning unit as “useless”).

²³ *Id.* at 63; *see also id.* at 45.

²⁴ *See* South Y Center Chain of Title Memo; 1973 Hakansson Sublease at 1; *see also* Declaration of Kerstin Hakansson (Aug. 23, 2022) (“2022 Hakansson Declaration”); Declaration of Kerstin Hakansson (June 6, 2017) (“2017 Hakansson Declaration”).

²⁵ 2022 Hakansson Declaration at ¶¶ 3-4; 2017 Hakansson Declaration at ¶¶ 3-4.

²⁶ *See* Proposed Order at 3 ¶ 6; Regional Board, Status Report on the “Y” Investigation in South Lake Tahoe (Sept. 4-5, 1997), at 1.

²⁷ *See* Regional Board, Notice to Submit Workplan for Investigation at LTLW (APN 023-421-011) (June 5, 2003); Regional Board, Request for Workplan for Supplemental Site Investigation at LTLW (Apr. 12, 2004); Regional Board, Revised Request for Workplan for Supplemental Site Investigation at LTLW (May 17, 2004); Order for Corrective Action Workplan, LTLW (Apr. 18, 2006); Regional Board, Investigative Order No. R6T-2009-0013 to Submit Workplan for Remediation at LTLW (Apr. 8, 2009).

agreement between Century 73 and Interland.²⁸ Fox filed a motion to dismiss, which the court granted in part and denied in part.²⁹ In the same action, Fox filed claims against a number of third parties, including Connolly Development, Interland, Leid's Inc., and a number of former LTLW tenants,³⁰ but never pursued these claims, as it eventually reached confidential settlement agreements with its insurance company and Seven Springs.

Subsequent to the settlement of the CERCLA action, Fox and Seven Springs jointly retained a consultant, Environmental Engineering, Consulting and Remediation, Inc. ("E₂C"), to remediate the LTLW as requested by the Regional Board. In June 2009, following discussions with the Regional Board, E₂C submitted to the Regional Board an Interim Remedial Action Workplan ("IRAP") that memorialized the parties' understanding that the contamination likely arose from a PCE spill in the parking lot and was primarily confined to the shallow groundwater at the LTLW.³¹ The IRAP proposed to install a soil vapor extraction/groundwater air sparging system ("SVE/GASS") to address volatile organic compounds ("VOCs") in vadose zone soil and shallow zone groundwater at the South Y Shopping Center.³² E₂C amended the plan in August 2009,³³ and the Regional Board approved it on September 1, 2009.³⁴ Operation of the SVE/GASS began in April 2010. As it operates today, the system consists of:

- Six (6) horizontal SVE wells
- Twenty (20) vertical SVE well pairs
- Twenty-seven (27) groundwater air sparge wells
- Ten (10) vapor probe points
- Eleven (11) on-site monitoring wells
- Seven (7) off-site monitoring wells

The Regional Board approved the SVE/GASS as the "final remedy" for the LTLW in 2013.³⁵ Quarterly sampling events show PCE concentrations in groundwater have reduced by several

²⁸ See Am. Compl., *Seven Springs v. Fox*, 2008 WL 5480179 (May 16, 2007).

²⁹ See Order, *Seven Springs v. Fox*, 2007 WL 1241844, at *2-6 (holding, based on precedents at the time, that Seven Springs could bring a contribution action under Section 107 of CERCLA, but that Seven Springs did not qualify for the innocent landowner defense and was not entitled to the benefits of the indemnity, which had, in any event, expired).

³⁰ See Fox's Third Party Complaint against Real Estate Mgmt. Associates, LLC, et al., *Seven Springs v. Fox*, 2008 WL 5480179 (Dec. 19, 2008).

³¹ E₂C, Interim Remedial Action Workplan for SZA Groundwater Investigation, SZA Groundwater Monitoring, Interim Remedial Action Vadose Zone Soil and Shallow Groundwater Cleanup, LTLW (June 4, 2009) ("IRAP") at 3-4 and Figure 3, 8.

³² See, e.g., *id.* at 3-4, 8.

³³ E₂C, Addendum to Interim Remedial Action Workplan for SZA Groundwater Investigation, SZA Groundwater Monitoring, Interim Remedial Action Vadose Zone Soil and Shallow Groundwater Cleanup, LTLW (Aug. 26, 2009) ("IRAP Addendum").

³⁴ Regional Board, Letter to Fox and Seven Springs re Acceptance of Interim Remedial Action Workplan and Addendum (Sept. 1, 2009).

³⁵ Regional Board, Letter to Seven Springs and Fox re Acceptance of Work Plan for Remediation and Order to Submit Technical Reports (Aug. 2, 2013) at 1.

orders of magnitude on-site. The most recent sampling conducted in April 2022 showed that only three of 11 on-site monitoring wells contained PCE above the maximum contaminant level (“MCL”) of 5 micrograms per liter (“µg/L”).³⁶ In April 2022, PCE was measured at 19 µg/L, 250 µg/L, and 18 µg/L in wells LW-MW-1S (in the parking lot, near the presumed location of a PCE spill), LW-MW-2S, and LW-MW-5, respectively. The Regional Board has acknowledged the effectiveness of the SVE/GASS in reducing PCE contamination in groundwater, stating “PCE concentrations in and downgradient of the pre-defined source area of the [LTLW] have significantly declined since operation of the AS/SVE remediation system commenced.”³⁷ For example, PCE in monitoring well LW-MW-1S, located near the release location at the LTLW, has declined from a maximum concentration of 5,380 µg/L in 2011 to 19 µg/L today.³⁸

C. Off-Site Activities

While the on-site remediation continued, in late 2014 and early 2015 the Regional Board detected PCE contamination at two wells “approximately 2,000 feet north” of the LTLW and alleged that the LTLW was the source.³⁹ Pursuant to a stipulated agreement with the Regional Board, without admitting liability, Fox and Seven Springs agreed to provide alternative water supply to the affected landowners.⁴⁰

The Regional Board then commissioned a report evaluating the potential sources of off-site contamination. The report “narrowed the area of likely PCE discharge to a nine-block area.”⁴¹ It concluded, among other things, that there were “separate PCE sources” of contamination at the eastern and western ends of the area.⁴² In light of this conclusion, the Regional Board’s consultant recommended that the Regional Board “[f]urther evaluate potential sources.”⁴³

On multiple occasions, Fox and Seven Springs have provided detailed information to the Regional Board about potential sources of the regional PCE contamination (“Regional PCE

³⁶ PES, First Quarter 2022 Monitoring Report, Former LTLW (June 15, 2022) (“2022 Q1 Monitoring Report”) at Table 3.

³⁷ Proposed Order at 8 ¶ 32.f.

³⁸ 2022 Q1 Monitoring Report at Table 3.

³⁹ Stipulated Agreement for Replacement Water Supply at 883 and 903 Eloise Avenue (May 20, 2015) at 2 ¶ 6.

⁴⁰ *Id.* at 2-3 ¶ 10.

⁴¹ URS, Final PCE Investigation Report, South Lake Tahoe (Jan. 19, 2016) (“URS Report”) at 2.

⁴² *See id.* at 7-8.

⁴³ *Id.* at 8.

Contamination”),⁴⁴ much of it derived from the Regional Board’s own files.⁴⁵ When the Regional Board refused to act on this information, Fox and Seven Springs voluntarily conducted their own sampling, which identified PCE in groundwater near several suspected off-site PCE sources.⁴⁶

In March 2019, the Regional Board obtained a \$4.6 million grant from the State Board that the Regional Board pledged to use to “track down all potential sources of pollution” to the Regional PCE Contamination.⁴⁷ The next month, the Regional Board issued Section 13267 investigative orders to 223 potentially responsible parties for properties identified through records searches for businesses that may have used, stored, handled, or disposed of chlorinated solvents within the off-site plume.⁴⁸ Based on the investigation that Fox and Seven Springs conducted in 2017 and responses to the investigation orders in 2019, three years later the Regional Board developed a source area inventory that identified 125 different sites as potential sources to the Regional PCE Plume, including 38 “high priority” and 66 “medium priority” sources.⁴⁹

The Proposed Order indicates that “these investigations and evaluation of potential additional PCE sources contributing to the regional PCE plume are ongoing and are not the subject of this CAO” and that the Regional Board “will continue to make a reasonable effort to identify additional dischargers contributing to the regional PCE plume.”⁵⁰

⁴⁴ The Regional Board depicts a plume on Figures 8-10 of the Proposed Order and variously refers to the contaminated area on these Figures as the “regional PCE plume,” the “Regional PCE Plume” and the “South ‘Y’ PCE Plume.” See Regional Board, “Staff Report Supporting Cleanup and Abatement Order No. R6T-2022-(Proposed)” (“Staff Report”), at 1, 27, and Figures 8-10. For the reasons set forth in the Technical Comments, Fox disagrees with the Regional Board’s characterization of the regional PCE contamination as a single plume originating from the LTLW, and therefore refers to the contaminated area depicted on Figures 8-10 of the Proposed Order as the “Regional PCE Contamination” throughout these comments.

⁴⁵ See, e.g., Fox Response to 2016 Revised Order at 35-47 (identifying numerous known and suspected PCE sources in the South Y area); EKI, Response to Water Board Notification of Consideration of No Further Action (Dec. 3, 2015) (identifying PCE sources at the downgradient former Big O property).

⁴⁶ See EKI, Off-Site Groundwater Investigation Data Report: South Y Area, South Lake Tahoe, California (EKI A70020.02) (Aug. 30, 2017) (prepared on behalf of Seven Springs and Fox); EKI, Investigation Summary Report: Former LTLW (EKI A70020.11) (Apr. 3, 2020), at 9-13 and Figures 5-1–5-5.

⁴⁷ Regional Board, Lahontan Water Board Receives \$4.6 Million Grant to Investigate Perchloroethylene (PCE) Contamination in South Lake Tahoe’s Groundwater, Media Release (Mar. 13, 2019), available at https://www.waterboards.ca.gov/press_room/press_releases/2019/pr20190313_reg6_grant_invest_pce_in_sl.t.pdf (last visited Sept. 17, 2022).

⁴⁸ Regional Board, Investigative Orders RGT-2019-0013 to 0235 (Apr. 3, 2019); see Regional Board, Memorandum Re Summary of 13267 Site History Questionnaire as of July 26, 2019 (Aug. 22, 2019), at 1; Proposed Order at 9 ¶ 34.

⁴⁹ AECOM Technical Services, Inc. (“AECOM”), Regional Plume Characterization Summary Report: South “Y” PCE Plume, 2019-2020 Field Season (“Regional Plume Characterization Summary Report”), at 8-9, Table B-1, n. 1 -2, and Figure B-1.

⁵⁰ Proposed Order at 9 ¶ 34.

D. Prior Proceedings with Respect to the LTLW

Despite the success of the on-site remediation system installed in 2010, the Regional Board has attempted on multiple occasions to impose additional liability on Fox under the Water Code. Beginning in September 2015, the Regional Board published several proposed orders, and then issued Cleanup and Abatement Order R6T-2017-0022 on May 12, 2017 (“2017 CAO”).⁵¹ In the 2017 CAO, the Regional Board alleged that Century 73 and Fox were liable for discharges of PCE at the LTLW because they knew or should have known that the LTLW tenants were operating a coin-operated dry cleaning unit on-site.⁵²

Significantly, though the proposed orders that preceded the 2017 CAO purported to hold Fox and other parties responsible for investigating and remediating both on-site contamination and a large off-site plume of PCE contamination, the 2017 CAO concluded that investigations performed to date had not generated conclusive data identifying the LTLW as the sole source of the Regional PCE Contamination.⁵³ Having determined that the current evidence was insufficient to require the cleanup and abatement of the Regional PCE Contamination under Water Code section 13304, the Regional Board limited the 2017 Order to the investigation, cleanup and abatement of contamination “originating from” the LTLW pursuant to Section 13267.⁵⁴

Fox and Seven Springs separately petitioned the State Water Resources Control Board (“State Board”) for review of the 2017 CAO,⁵⁵ but the State Board did not act on either petition, and

⁵¹ Regional Board, Proposed Cleanup and Abatement Order No. R6T-2015-PROP, Requiring Seven Springs Limited Partnership and Fox Capital Management Corporation, to Clean Up and Abate the Discharge and Threatened Discharge of Chlorinated Hydrocarbons to the Groundwaters of the Lake Tahoe Hydrologic Unit, at LTLW (Sept. 15, 2015) (“2015 Proposed Order”); S. Reisch, Fox’s Response to Proposed Cleanup and Abatement Order for Former LTLW (Feb. 11, 2016); Regional Board, Revised Cleanup and Abatement Order No. R6T-2016-PROP (July 18, 2016) (“2016 Revised Order”); S. Reisch, Fox’s Response to Revised Cleanup and Abatement Order for Former LTLW (Sept. 8, 2016) (“Fox Response to 2016 Revised Order”); Regional Board, Cleanup and Abatement Order R6T-2017-0022 Requiring Remediation and Additional Investigation of PCE Groundwater Contamination, LTLW, Site Cleanup Program CASE T6S043” (May 12, 2017).

⁵² See 2017 CAO at 9-10 ¶¶ 35-36; Regional Board’s Opposition to Opening Briefs in Support of Verified Petitions for Writ of Administrative Mandamus (“Regional Board’s Opposition Brief”), *Fox Capital Management Corp. v. Lahontan Regional Water Quality Control Bd.*, Case No. SC20170189 (Cal. Super. Ct., El Dorado Cty.) (Sept. 6, 2019) (“*Fox v. Reg’l Bd.*”) at 25 (“Fox knew, or should have known, of the presence and operation of the Dry Cleaning Unit that the Regional Board determined resulted in the PCE contamination.”).

⁵³ Compare 2017 CAO at 2-3 ¶ 7, 12-13 ¶¶ 46-50, with 2015 Proposed Order at 12-13 ¶¶ 43-48; 2016 Revised Order at 11-12 ¶¶ 34-36.

⁵⁴ 2017 CAO at 2-3 ¶ 7; see also *id.* at 13 ¶ 50. The Regional Board has since acknowledged that it does not have authority to require cleanup and abatement under Section 13267. Regional Board’s Opposition Brief, *Fox v. Reg’l Bd.*, at 33.

⁵⁵ Fox’s Petition for Review, Request to Supplement the Record, and Request for Hearing, In re: Order R6T-2017-0022 (State Board, June 12, 2017); Seven Springs’ Petition for Review, In re: Order R6T-2017-0022 (State Board, June 12, 2017).

both Fox and Seven Springs filed writs challenging the 2017 Order in El Dorado Superior Court.⁵⁶

While those challenges were pending, in 2019, the Court of Appeal issued its decision in *United Artists*, clarifying the circumstances under which a former landlord is considered to have “permitted” a discharge under Section 13304 of the Water Code. The Court of Appeal found that liability depended upon the former landlord’s knowledge of the reasonable possibility of a discharge.⁵⁷ In reaching its conclusion, the Court of Appeal explicitly rejected the imposition of liability under Section 13304 based on the prior landlord’s mere knowledge of the general activities of the tenant that resulted in the discharge.⁵⁸

In light of *United Artists*, Fox submitted a supplemental brief to the El Dorado Superior Court in support of its petition for administrative mandamus.⁵⁹ On June 1, 2020, the Superior Court vacated the 2017 Order as to Fox and remanded to the Regional Board to reconsider Fox’s liability in light of the criteria established for former landowner/lessor liability in *United Artists*.⁶⁰ As a result, Fox has not been subject to the 2017 Order since June 1, 2020.

After the case against Fox was dismissed, the El Dorado Superior Court granted in part and denied in part Seven Springs’ petition for a writ of mandate. Among other rulings, the court found that there was “insufficient evidence to link Seven Springs to all the PCE contamination to the regional plume or the extent of migration off-site.”⁶¹ The court also ruled that the 2017 CAO impermissibly “contained no discussion about the burden and costs bearing a reasonable relationship to the need for the report and the benefits to be obtained from the reports.”⁶² Accordingly, the court found that the portion of the 2017 CAO related to monitoring and technical reports under Section 13267 was “defective.”⁶³ The Regional Board chose not to appeal these rulings and together with Seven Springs, jointly filed a proposed judgment invalidating the 2017 CAO to the extent it was issued under Section 13267.⁶⁴

E. The Proposed Order

In June 2022, the Regional Board issued the Proposed Order naming Fox, Seven Springs, Connolly Development, and Bobby Page’s as “Dischargers” under Sections 13267 and 13304 of

⁵⁶ Fox’s Verified Petition for Writ of Administrative Mandamus, *Fox v. Reg’l Bd.*, Case No. SC20170189 (Cal. Super. Ct. El Dorado Cty., Oct. 17, 2017); Seven Springs’ Verified Petition, *Seven Springs v. Reg’l Bd.*

⁵⁷ *United Artists*, 42 Cal. App. 5th at 857, 864-65, 887.

⁵⁸ *Id.* at 864.

⁵⁹ Supplemental Brief in Support of Fox’s Verified Petition for Writ of Administrative Mandamus, *Fox v. Reg’l Bd.*, (Apr. 16, 2020).

⁶⁰ Minute Order, *Fox v. Reg’l Bd.* (June 6, 2020).

⁶¹ Minute Order, *Seven Springs v. Reg’l Bd.*, Case No. SC20180061 (Nov. 5, 2020) at 39.

⁶² *Id.* at 45.

⁶³ *Id.* at 47.

⁶⁴ Proposed Judgment, *Seven Springs v. Reg’l Bd.* (Nov. 18, 2020) at ¶ 2.

the Water Code.⁶⁵ The Proposed Order directs these entities to investigate, clean up, and abate the Regional PCE Contamination that it alleges is a result of PCE spills arising in connection with PCE delivery, handling and disposal practices associated with the LTLW's coin-operated dry cleaning unit.⁶⁶

The Proposed Order's scope is expansive. Among other things, it requires Fox and the other named parties to:

- prepare, submit for approval to the Regional Board, and then implement at least 14 different plans for investigation, remediation, and monitoring;⁶⁷
- investigate, remediate, and monitor a contaminated area that stretches over a mile, which includes properties occupied by over one hundred known or potential PCE dischargers;⁶⁸
- evaluate the need for and, as necessary, provide emergency and long-term replacement water throughout the South Lake Tahoe Basin;⁶⁹ and
- prepare human health and ecological risk assessments with respect to a wide range of exposure pathways—soil, soil vapor, surface water, and groundwater—and all known and potential threats they may pose.⁷⁰

The Proposed Order asserts that the named parties are liable for this sweeping scope of work pursuant to Sections 13304 and 13267 of the Water Code. As to Section 13304, the Proposed Order does not allege that Fox discharged or caused the discharge of any PCE or that it had actual knowledge of any discharge of PCE during the 1970s, but rather that it “permitted” discharges of PCE by the LTLW because it should have known of the *general activity* that created a possibility of discharge.⁷¹ Alternatively, the Proposed Order alleges that Fox is liable as the general partner of Century 73, and that Century 73 should have known of the general activity that created a possibility of a discharge.⁷² The Proposed Order includes no distinct analysis as to why Section 13267 applies to Century 73 or Fox.

⁶⁵ Proposed Order at 1 ¶ 1. Of the listed parties, only Fox and Seven Springs have ever contributed to the investigation or cleanup of the LTLW. As far as Fox knows, the Regional Board has never filed an enforcement action against Bobby Page's or Connolly Development as a result of their lack of compliance with past agency directives.

⁶⁶ See Proposed Order at 2 ¶ 5, 13-14 ¶ 55, 20-32, Required Actions (“RA”) ¶¶ 1-10; Staff Report at 17-18.

⁶⁷ See Proposed Order at 20-32, RA ¶¶ 1-10, and Attachment E.

⁶⁸ See *id.* at 21-24, 29-30, RA ¶¶ 2-4, 7(d)-(e).

⁶⁹ See *id.* at 13-14 ¶¶ 52-53, 26-29 RA ¶¶ 7(b), (c).

⁷⁰ See *id.* at 25-26 RA ¶ 6.

⁷¹ Proposed Order at 18 ¶ 75.

⁷² *Id.* at 18 ¶¶ 73, 75. Because the Regional Board appears to argue both that Fox is derivatively liable as the former general partner of Century 73 and directly liable in its own right, we address the liability of both Century 73 and Fox throughout these comments.

III. STANDARD OF PROOF

The Regional Board's Proposed Order will not be upheld by the courts if the Regional Board did not proceed "in the manner required by law" or the Proposed Order "is not supported by the findings, or the findings are not supported by the evidence."⁷³ A Cleanup and Abatement Order must be supported by the "preponderance of evidence."⁷⁴ The Regional Board itself has previously conceded that "[t]he applicable evidentiary standard, in the first instance, to evaluate whether a discharger caused or permitted the discharge to waters of the state, is the preponderance of the evidence standard."⁷⁵ Under a preponderance of the evidence standard, the Regional Board must show that "the evidence on one side outweighs, preponderates over, is more than, the evidence on the other side."⁷⁶

For the reasons set forth below, the Proposed Order does not comply with the law, is not backed by adequate findings, and is not supported by a preponderance of the evidence.

IV. THE REGIONAL BOARD HAS APPLIED THE WRONG STANDARD FOR IMPOSING LIABILITY UNDER SECTION 13304 OF THE WATER CODE

If finalized, the Proposed Order would be the first order issued by a California regional water quality board applying the landmark *United Artists* decision. As explained below, because the Proposed Order fundamentally misstates the test for liability under *United Artists*, it must be withdrawn.

A. Section 13304 Imposes Liability Only on Parties that Cause or Permit a Discharge into State Waters that Creates or Threatens to Create Pollution or a Nuisance.

In *United Artists*, the California Court of Appeal construed Section 13304(a) of the Water Code, which provides, in relevant part:

A person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall, upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case

⁷³ Cal. Code of Civ. Pro. § 1094.5(b); Minute Order, *Seven Spring v. Reg'l Bd.*, at 6.

⁷⁴ Minute Order, *Seven Spring v. Reg'l Bd.*, at 7-8, 10, 17.

⁷⁵ See Cleanup and Abatement Order (May 12, 2017) App. B. at 8 n.3; see also, e.g., *Barclay Hollander Corp. v. Cal. Reg'l Water Quality Control Bd.*, 38 Cal. App. 5th 479, 497 (2019); Minute Order, *Seven Spring v. Reg'l Bd.*, at 18.

⁷⁶ *Glage v. Hawes Firearms Co.*, 226 Cal. App. 3d 314, 325 (Cal. App. 1990) (citing *People v. Miller*, 171 Cal. 649, 652 (1916)).

of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts.⁷⁷

Unlike many environmental cleanup statutes, Section 13304 is not a strict liability statute.⁷⁸ Section 13304 does not hold a party liable merely because it owned a property while the property became contaminated or after it became contaminated. Instead, the statute imposes liability on a prior owner only where the prior owner “caused or permitted” a discharge into waters of the State that creases or threatens to cause pollution or a nuisance.⁷⁹

In this case, the Regional Board does not contend that Century 73 or Fox “caused” a discharge, and there is no evidence that either entity did. Instead, the Regional Board alleges only that Century 73 and Fox “permitted” a discharge.⁸⁰ The Regional Board acknowledges that the Court of Appeal in *United Artists* has established a new standard for determining when a former landowner can be deemed to have permitted a discharge,⁸¹ but, as explained below, it failed to apply it.

B. *United Artists* Requires Knowledge of a Discharge to Establish Liability under Section 13304

Prior to 2019, the Regional Board and the San Francisco Regional Water Quality Control Board (“San Francisco Regional Board”) contended that, under a “longstanding agency interpretation” of Section 13304, if a landowner knew that its former tenant conducted dry cleaning activities, the landowner had “permitted” a discharge and could be named in a cleanup order.⁸² In the *United Artists* case, the Court of Appeal explicitly rejected this reading of the statute.

The facts of the *United Artists* case are similar to those presented here. The San Francisco Regional Board issued a cleanup and abatement order to United Artists Theatre Circuit, Inc. (“UATC”), a movie theater company that developed the Moonlite Shopping Center in Santa Clara, California, in 1960 and owned or served as the master lessor of the shopping center until November 1978.⁸³ Dry cleaning operations began at the shopping center in mid-1962 and continued until at least October 1996. The San Francisco Regional Board maintained that UATC was liable under Section 13304 for the cleanup of property contaminated by its dry cleaner

⁷⁷ Water Code § 13304(a) (emphasis added).

⁷⁸ See *United Artists*, 42 Cal. App. 5th at 867-68; cf. 42 U.S.C. § 9607(a)(2) (imposing federal cleanup liability under CERCLA on prior owners “at the time of disposal”); Cal Health & Safety Code § 25323.5(a)(1) (state CERCLA analogue); *City of Modesto*, 19 Cal. App. 5th at 158 (recognizing that CERCLA and its state-law analogue in California’s Polanco Act impose strict liability).

⁷⁹ See, e.g., *United Artists*, 42 Cal. App. 5th at 864.

⁸⁰ See Proposed Order at 5 ¶ 21, 18 ¶¶ 73, 75; Staff Report at 2-4.

⁸¹ Proposed Order at 5 ¶ 21; Staff Report at 1-3.

⁸² San Francisco Regional Board, Combined Reply Brief and Cross-Appeal Opposition Brief, *United Artists*, 2018 WL 5314302, at *9, 14 (Oct. 24, 2018) (suggesting this interpretation has been followed by the State Board “for over twenty-five years”); see also *United Artists*, 42 Cal. App. 5th at 884-887; 2017 CAO at 9-10 ¶¶ 32-36.

⁸³ *United Artists*, 42 Cal. App. 5th at 860.

tenant because it knew what type of business the tenant conducted based on an occupancy permit and a fire marshal permit.⁸⁴ The San Francisco Regional Board’s cleanup order asserted that UATC was properly named as a discharger simply because it owned the site when discharges occurred, had the legal ability to prevent them, and “had knowledge of the activities that caused the discharge.”⁸⁵ As the Court of Appeal later described it, the San Francisco Regional Board’s position was that “in order to be responsible for ‘permitting’ a discharge, a prior owner need only have knowledge of *the general activity* of the tenant that resulted in the discharge.”⁸⁶

Applying that broad standard to UATC, the San Francisco Regional Board maintained that UATC had “permitted” PCE discharges because (1) UATC knew that its former tenant conducted dry cleaning activities and used solvents in doing so, (2) the “historical record” showed that UATC knew that PCE was recognized as a hazardous substance; and (3) studies of dry cleaners at other sites showed that some dry cleaners had engaged in sloppy practices or discharges to sanitary sewers that resulted in groundwater contamination.⁸⁷

UATC challenged the San Francisco Regional Board’s Order on the grounds that Section 13304 requires “knowledge of a discharge,” not mere knowledge of dry cleaning activities.⁸⁸ The Alameda Superior Court agreed and invalidated the UATC Cleanup Order.⁸⁹ In particular, the court ruled that San Francisco Regional Board had incorrectly focused on “knowledge of activities” rather than “knowledge of a discharge” and that “general knowledge that dry cleaners can discharge hazardous chemicals is not direct evidence that the activities at this particular dry cleaner posed a reasonable suggestion of a discharge at the site.”⁹⁰

On appeal, in 2019, the California Court of Appeal explicitly “reject[ed]” the Regional Board’s attempt to impose liability based on UATC’s alleged knowledge of the general activities of its tenant, and established a narrower standard for determining whether a prior owner “permitted” a discharge under Section 13304(a):

a prior owner may be named in a cleanup order as someone who has “permitted” a discharge if it knew or should have known that a lessee’s activity presented a

⁸⁴ *Id.* at 868-69.

⁸⁵ San Francisco Regional Board Order No. R2-2013-0032, Adoption of Site Cleanup Requirements for Moonlight Associates, LLC, and United Artists Theatre Circuit, Inc. (Sept. 11, 2013) (“UATC Cleanup Order”), at 2 ¶ 3.

⁸⁶ *United Artists*, 42 Cal. App. 5th at 864 (emphasis added); *see, e.g.*, San Francisco Regional Board’s Opposition on the Merits, *United Artists Theatre Circuit, Inc. v. Cal. State Water Resources Control Bd.*, Case No. RG16811955 (Cal. Super. Ct., Alameda Cty.) (Apr. 19, 2017), at 18 (insisting that Section 13304 requires “that the former landowner need simply to have knowledge of the activity that caused the discharge”); *see also* San Francisco Regional Board’s Combined Reply Brief and Cross-Appeal Opposition Brief, No. A152988 (Cal. App. 1 Dist.), at 23-24 (“The State Board and Regional Board’s interpretation is that the statute requires that a former landowner have knowledge of the activity that led to the discharge (or threatened discharge).”).

⁸⁷ *See* UATC Cleanup Order, Staff Report at 10-11.

⁸⁸ *See, e.g.*, UATC’s Memorandum of Points and Authorities in Support of UATC’s Motion for Administrative Writ of Mandamus, *United Artists*, Case No. RG16811955, at 6 (Jan. 26, 2017).

⁸⁹ *See* Order, *United Artists*, Case No. RG16811955 (Sept. 29, 2017), at 23.

⁹⁰ *Id.* at 23-26.

reasonable possibility of discharge into waters of the state of wastes that could create or threaten to create a condition of pollution or nuisance.⁹¹

Accordingly, the Court of Appeal ruled that a landlord’s “[s]imple awareness that its lessee was a dry cleaner” is insufficient to establish liability under the statute and that more than “mere knowledge of the nature of tenant’s business” is required.⁹² In particular, the Court of Appeal found that “before an owner can be said to have ‘permitted’ harm resulting from a lessee’s conduct, there must be some basis to conclude that the owner was aware or should have been aware of the reasonable possibility that harm would occur—in this case the discharge of wastes that could create or threaten to create a condition of pollution or nuisance.”⁹³

Based on the Court of Appeal’s ruling, the San Francisco Regional Board agreed to remove UATC from the cleanup and abatement order.⁹⁴

Thus, following the *United Artists* decision, to establish liability under Section 13304, the Regional Board must show by a preponderance of the evidence that Fox knew or should have known that the coin-operated dry cleaning unit at the LTLW created a reasonable possibility of discharging wastes, and that those wastes could reach state waters (including groundwater) and result in a condition of pollution or nuisance.

C. The Proposed Order Does Not Follow Legal Standard Adopted by *United Artists*

Despite conceding that the *United Artists* decision governs this case, the Proposed Order fails to apply it. Paragraph 73 of the Proposed Order asserts that Century 73 is liable under Section 13304 because it “had knowledge of . . . the activities . . . that caused the discharge.”⁹⁵ Paragraph 75 of the Proposed Order similarly provides that “[t]he evidence establishes that Fox knew or should have known of the general activity that created a reasonable possibility of discharge into waters of the state that could create or threaten to create a condition of pollution or nuisance.”⁹⁶ In both paragraphs, the quoted language reflects the same legal theory advanced by the San Francisco Regional Board and rejected by the Court of Appeal in *United Artists*.⁹⁷ After

⁹¹ *United Artists*, 42 Cal. App. 5th at 857, 864-65, 887 (emphases added).

⁹² *Id.* at 864, 876.

⁹³ *Id.* at 879.

⁹⁴ See Order Vacating Judgment and Staying Case Pending Resolution Following Stipulation by the Parties, *United Artists*, Case No. RG16811955 (May 29, 2020); see also San Francisco Regional Board, Order No. R-2020-0022, Amendment of Site Cleanup Requirements (June 17, 2020) (removing UATC as a named discharger under Order No. R2-2013-0032).

⁹⁵ Proposed Order at 18 ¶ 73 (emphasis added).

⁹⁶ *Id.* at 18 ¶ 75 (emphasis added).

⁹⁷ See *United Artists*, 42 Cal. App. 5th at 864 (“The [San Francisco Regional Board]’s position is that, in order to be responsible for “permitting” a discharge, a prior owner need only have knowledge of the general activity of the tenant that resulted in the discharge”) (emphasis added); *id.* at 864-65 (explicitly rejecting the San Francisco Regional Board’s legal theory).

United Artists, it is clear that it is knowledge of a discharge (or of the reasonable possibility of a discharge) that matters, not mere knowledge of a tenant’s activities.⁹⁸

The Proposed Order’s misstatement of the legal standard under *United Artists* is fatal to the Regional Board’s claim that Fox is liable under Section 13304. On this basis alone, the Proposed Order must be withdrawn.

V. THE PREPONDERANCE OF THE EVIDENCE DOES NOT SUPPORT THE REGIONAL BOARD’S CLAIMS

Even if the Regional Board were to apply the correct legal standard, the Proposed Order would still be unlawful because the Regional Board has not shown—and cannot show—that Century 73 or Fox knew or should have known that the use of a coin-operated dry cleaning unit at the LTLW presented a reasonable possibility of a groundwater contamination condition or nuisance.

Despite the fact that that the Regional Board has been investigating the Regional PCE Contamination for over thirty years, there is no evidence of any kind—no eyewitness testimony, no contemporaneous documents—that either Century 73 or Fox actually knew of any discharge into waters of the state from the LTLW. In fact, both of the tenants that operated the LTLW during Century 73’s ownership of the South Y Shopping Center have provided sworn statements that they had no knowledge of any PCE spills at the LTLW. Accordingly, the Regional Board’s case rests entirely on the claim that Century 73 and Fox “should have known” of a discharge of PCE that even the operators of the LTLW did not know of or suspect. As explained in detail below, none of the evidence supplied by the Regional Board—and certainly not a preponderance of the evidence in the record—supports the Regional Board’s position.

A. The Regional Board Has Failed to Show that Century 73 or Fox Should Have Known that the LTLW Created a Reasonable Possibility of a Discharge that Could Create a Nuisance

In alleging that Century 73 and Fox “should have known” of the reasonable possibility of a discharge from the LTLW to state waters, the Regional Board cites neither contemporaneous, site-specific documents nor testimony (or any other statements) from percipient witnesses or anyone associated with the LTLW or the South Y Shopping Center.⁹⁹ Instead, much like the San Francisco Regional Board did in the *United Artists* case and the Regional Board did in the now-invalid 2017 CAO, the Regional Board relies upon circumstantial evidence from other sites and academic literature. Below, we discuss the information relied upon by the Regional Board and show that none of it supports the Regional Board’s claim.

⁹⁸ *Id.* at 857, 864-65, 887.

⁹⁹ It appears that the Regional Board demanded investigation workplans from Baisleys and Hakanssons in 2003 and 2004, but there is no indication that the Regional Board ever requested contemporaneous documents from them or attempted to interview the Baisleys, the Hakanssons or any other LTLW tenants about their operations.

1. The *City of Modesto* Documents Cited by the Regional Board Do Not Demonstrate that Century 73 or Fox “Should Have Known” of Discharges at the LTLW

The Regional Board rests its case primarily on the evidentiary record from another dry cleaner contamination case, *City of Modesto v. Dow Chemical Company*.¹⁰⁰ In that case, the City of Modesto and other municipal entities (collectively, the “City”) sued 28 defendants, including PCE manufacturers, equipment manufacturers, distributors of PCE and dry cleaning equipment, and dry cleaning stores at/near the contaminated sites at issue. The City alleged that the defendants had contaminated the city’s groundwater and soils with PCE and sought recovery for the past, present, and future costs of investigating and remediating the contamination at numerous sites under multiple legal theories. The sprawling litigation, active since 1998, has gone through five trial phases and three appeals.

The City’s claims were predicated mostly upon common law theories—including strict liability, negligence, negligence per se, continuing trespass, private and public nuisance, private and public nuisance per se, and ultrahazardous activity—but the City also pursued statutory claims under California’s cleanup statutes.¹⁰¹ Notably, the City did not claim that any defendant was liable under Section 13304 because it knew or should have known that dry cleaners cause discharges resulting in groundwater contamination nuisances.¹⁰² To the contrary, the City alleged that the manufacturers and distributors of PCE solvents and systems failed to warn retail dry cleaners of the risk of PCE spills and associated contamination.¹⁰³

Rather than relying on any court rulings in *City of Modesto*, the Regional Board asserts that the evidence adduced in that case shows that dry cleaner operations posed a risk of groundwater contamination and that during the 1970s a landowner should have known that was the case.¹⁰⁴ But even with the benefit of the *City of Modesto* record, the Regional Board cannot point to a single landlord (or even a retail dry cleaner) who actually knew in the 1970s of a “reasonable possibility” that dry cleaning operations would result in groundwater contamination. Indeed, a review of each of the nine categories of evidence cited by the Regional Board demonstrates a widespread ignorance during the relevant timeframe of any such risk during that timeframe, even among dry cleaning industry insiders.

¹⁰⁰ Staff Report at 5-15 (two-thirds of liability discussion devoted to *City of Modesto* case); see *City of Modesto v. Dow Chemical Co.*, Case Nos. CGC-98-999345 and CGC-98-999643 (consolidated) (Cal. Super. Ct., San Francisco Cty.).

¹⁰¹ *City of Modesto Redevelopment Agency v. Superior Ct.*, 119 Cal. App. 4th 28, 33 (2004), as modified on denial of reh’g (June 28, 2004) (“*City of Modesto I*”).

¹⁰² See, e.g., Final Statement of Decision, *City of Modesto*, Case Nos. CGC-98-999345 & CGC-98-999643 (Cal. Super. Ct., San Francisco Cty., Feb. 14, 2007), 2007 WL 6936528, at III-B, ¶ 14 (reflecting that the City’s claim against a retail dry cleaner was under the Polanco Act’s strict liability, CERCLA-analogue prong, not Section 13304).

¹⁰³ See, e.g., *City of Modesto II*, 19 Cal. App. 5th at 147-59; *City of Modesto I*, 119 Cal. App. 4th at 33.

¹⁰⁴ See Staff Report at 75-79 (listing depositions and exhibits from *City of Modesto* cited as references).

a. “PCE Was Commonly Used in Dry Cleaning.”¹⁰⁵ The Regional Board begins by presenting evidence from the *City of Modesto* record that dry cleaners increasingly used PCE in the 1960s, largely because it was considered less flammable than petroleum-based solvents. The evidence is unremarkable. It is not evidence of the reasonable possibility of a discharge to groundwater that could threaten to cause a nuisance, or of anyone’s knowledge of such a possibility.

b. “PCE is a Hazardous Substance.”¹⁰⁶ The Regional Board cites a number of documents that purport to demonstrate that PCE was known to be hazardous. However, the documents referenced by the Regional Board consist of documents from a different time period (the 1940s or 1950s)¹⁰⁷ or documents that concern hazards other than the hazards at issue in this case (e.g., inhalation and skin hazards from product use), or both. For example, the Regional Board references “Staff Report Ref. #2, “Manufacturing Chemists Ass’n, PCE Chemical Safety Data Sheet SD-24, 1948” (*City of Modesto* Ex. 14), which is a 1948 document that identifies inhalation and skin hazards, but makes no mention of a groundwater contamination risk. The Regional Board also references a “Staff Report Ref. #5, Trade Waste Waters, 1959, Abstract of Karnovsky & Rupprecht, Vapours of [PCE] endanger sewer operation and the sewer workers, *Stüudtehygiene*, 1958” (*City of Modesto* Ex. 189), which summarizes a German article about harm to sewer systems, workers, and microorganisms in sewage treatment process, but again does not discuss groundwater contamination. A third document, “Staff Report Ref. #6, Dow, Pollutional Evaluation of Compounds with Red Flag Designation, 1965” (*City of Modesto* Ex. 22), is an internal Dow Chemical document identifying PCE as hazardous under a test for degradability used by sewage plants. The Regional Board also references “Staff Report Ref. #9, Am. Insur. Asso., Chemical Hazards Bulletin, Chlorinated Hydrocarbons, 1967” (*City of Modesto* Ex. 197), which focuses on the need for ventilation and problems with inhalation and body contact. Importantly, there is no direct or even circumstantial evidence that any of these documents would have been reviewed by the operators of the LTLW, Century 73, or Fox, and it is unreasonable to assume that a general partner of a shopping center landlord should have known of the contents of documents such as abstracts of German studies of microorganisms in sewage systems.

The latter issue also applies to “Staff Report Ref. #26,” a 1978 edition of Dow Chemical’s *Spot News* newsletter, cited in this section and those that follow. There is no reason to believe that a landlord of a dry cleaner would have received *Spot News*; indeed, according to a dry cleaner operator deposed in *City of Modesto*, Dow sent *Spot News* only to its customers, which consisted

¹⁰⁵ Staff Report at 5 § 2.2.1.

¹⁰⁶ *Id.* at 5-6 § 2.2.2.

¹⁰⁷ The Regional Board assumes that something that was “allegedly” known in the 1950s would have been “known” in the 1970s, but of course, that’s not true. Sometimes knowledge is lost over time. In addition, science evolves over time, and one decade’s “fact” can be another decade’s “fallacy.”

of wholesale distributors not retail dry cleaners or laundry operators.¹⁰⁸ In fact, a product steward and industry development manager for Dow had no knowledge of this *Spot News* newsletter or its content,¹⁰⁹ and neither did an employee of a dry cleaning equipment distributor since 1967.¹¹⁰ Further, the testimony of the LTLW tenants contradicts the notion that any of the LTLW operators engaged in any of the practices described in the newsletter.

c. “Dry Cleaning Equipment Was Known to Leak”¹¹¹ & “Insubstantial Leaks Were Known to Cause Significant Discharges.”¹¹² The documents cited by the Regional Board in these categories discuss concerns with evaporated solvent harming workers, and drips of liquid solvent from leaky machines that could then evaporate, not liquid discharges that would contaminate groundwater. For instance:

- “Staff Report Ref. #4, Dow, Spot News, 1958” (*City of Modesto* Ex. 13) states: “It is very possible for a slow leak to develop, and solvent can actually be dripping to the floor...drop by drop, without showing a wet surface, because each drop evaporates before the second reaches the surface.”
- “Staff Report Ref. #12, PPG Solvent News, 1970” (*City of Modesto* Ex. 26) discusses safety issues relating to PCE vapors, not liquid discharges threatening environmental contamination.
- “Staff Report Ref. #17, Dow, Spot News, 1973” (*City of Modesto* Ex. 88) contains an article to dry cleaners about how to get “good mileage” out of their solvent. The article indicates that a leak of one drip per second could result in a loss of half a gallon of solvent over the course of an eight-hour operating day. It does not state that the solvent lost over the course of a day would form a liquid pool, or that any of the lost liquid might result in a discharge into groundwater (or the sewer).
- “Staff Report Ref. #18, PPG Per-Check, Operating tips for better dry cleaning, Solvent Conservation, 1974” (*City of Modesto* Ex. 404) is a checklist concerned with preventing harmful PCE vapors and meeting OSHA standards, not liquid discharges on the ground or even down the drain.

¹⁰⁸ See Transcript of Deposition of M. McLemore (May 28, 1999) (“McLemore Dep.”) at 18, 102; see also Transcript of Deposition of T. Opsahl (Nov. 22, 2002) (“Opsahl Dep.”) at 10, 24 (testimony of distributor who sometimes reviewed *Spot News*, though he was not sure how his office obtained it). There is also nothing in the record to suggest that Dow Chemical supplied PCE to the company that (very infrequently) delivered PCE to the LTLW.

¹⁰⁹ See Transcript of Deposition of J. Hickman (Sept. 18, 2002) (“Hickman Dep.”) at 28-29.

¹¹⁰ See Opsahl Dep. (Nov. 22, 2002) at 23-25.

¹¹¹ Staff Report at 6-7 § 2.2.3.

¹¹² *Id.* at 7-8 § 2.2.4.

- “Staff Report Ref. #25, US EPA, Control of Volatile Organic Emissions from Perchloroethylene Dry Cleaning Systems, 1978” (not a *City of Modesto* exhibit, but cited by in this section) is a report from EPA air emissions divisions about controlling air emissions of volatile organic compounds from dry cleaning machines using PCE. It does not address liquid discharges or related risks. Like the 1973 *Spot News* item discussed above, this report notes that a leak of one drip per second could result in the loss of four liters of solvent in a day, but the report immediately thereafter explains that “[b]ecause of the volatility of the solvents, these liquid leaks are eventually evaporated to atmosphere.”
- Staff Report Ref. #68, PPG, Cleaner Cleaner Bulletin #13, Leak Detection (*City of Modesto* Ex. 93), focuses on evaporation, vapor leaks, effect of vapor on worker health, and methods of detecting vapor leaks; nowhere does it suggest that dripped solvent likely to result in liquid spills or discharges to groundwater.

None of these documents support the Regional Board’s allegations in the Proposed Order that Century 73 or Fox should have known of the reasonable possibility of a discharge to state waters that could cause a nuisance. Indeed, as with documents in the prior grouping, some of the documents in this category actually demonstrate that dry cleaners and their landlords would be unlikely to be aware of PCE contamination. For example, the 1958 edition of *Spot News* notes that solvents could drip on the floor “without showing a wet surface” which suggest that such drips, if any, would be difficult, if not impossible, for an observer to detect. In addition, as late as 1978, EPA was advising that PCE leaks from dry cleaners would evaporate to the atmosphere, which is the opposite of warning that leaks would leach into groundwater.

d. “Dry Cleaners Disposed of Separator Wastewater Down Drains or on the Ground.”¹¹³ “Dry Cleaners Were Instructed to Bury Discharges or Allow Them to Evaporate on the Ground,”¹¹⁴ and “Dry Cleaners Disposed of PCE Waste on the Ground or in the Trash.”¹¹⁵ The Regional Board’s citations in these three categories, which concern the pouring of separator wastewater down drains or disposing of wastes on the on the ground or in the trash, are irrelevant in this case, where the data show (and Regional Board alleges) that groundwater contamination arose from parking lot spills during delivery/transfer of PCE at the LTLW rather than from sloppy operating practices or sewer releases.¹¹⁶ In addition, even if other dry cleaners disposed of PCE on the ground or in the trash, there is no evidence that the tenants of the LTLW did so.¹¹⁷

¹¹³ Staff Report at 8-10 § 2.2.5.

¹¹⁴ *Id.* at 10-11 § 2.2.6.

¹¹⁵ *Id.* at 11-12 § 2.2.7.

¹¹⁶ Technical Comments § 1.1 (describing data that show the release at the LTLW occurred in the parking lot); *id.* at §§ 1.1, 2.6 (discussing the absence of sewer releases); Staff Report at 18 n. 6 (release occurred in the parking lot area).

¹¹⁷ Baisley Dep. at 86-91, 101, 137; 2022 Hakansson Declaration at ¶¶ 3-4. The Regional Board’s assertion that “it is likely spent PCE was buried at the [LTLW] or allowed to evaporate on the ground” (Staff Report at

Moreover, there is no evidence that the operators of the LTLW, let alone Century 73 or Fox, actually received and reviewed or even could reasonably be expected to have received and reviewed the manufacturer publications cited by the Regional Board. Indeed, there is no evidence that either PPG or Dow, authors of most of the publications, supplied PCE to the LTLW, and no evidence that the equipment referenced in other publications, such as the “1965 Class 2143 Martin Perchlor-Saver Tumbler” and R.R. Street’s “Puritan 4000-SRS Solvent Recovery System” operated at the LTLW.¹¹⁸ The Regional Board also inexplicably relies upon a 1982 publication (issued several years after the Baisleys gave away the coin-operated dry cleaning unit) that was geared to “plant[s] doing about 1,500 pounds of cleaning per week.”¹¹⁹ None of these documents is relevant to determining what a landowner should have known about the possibility of groundwater impacts from a small mom-and-pop laundromat with a single, rarely used coin-operated dry cleaning unit.

The Staff Report relies on the deposition testimony of Thomas Opsahl, an employee of a dry cleaning equipment distributor, for the proposition that it was “[c]ommon sense, logic” that PCE found in a well must have been connected to PCE that was discharged “down the sewer lines.”¹²⁰ But, as the Regional Board acknowledges, it is clear from Opsahl’s deposition that he did not learn of the PCE detections until October 1983.¹²¹ Opsahl’s “20-20 hindsight” is not compelling evidence. The fact that, after groundwater was sampled in the early 1980s,¹²² Opsahl connected PCE detections to disposal of PCE by nearby dry cleaners tells us little about whether in the 1970s anyone “should have known” about the risk of groundwater contamination from dry cleaners before it was discovered. His testimony tells us even less about whether a landlord or its general partner should have known that an infrequently used coin-operated dry cleaning unit posed a risk of groundwater contamination.

e. “Ordinary Dry Cleaning Practices Led to Discharges.”¹²³ The Staff Report cites individual depositions from *City of Modesto* for essentially the same propositions already addressed in the preceding headings. Thus, for the same reasons, these references fail to establish that Century 73 or Fox should have known of a reasonable possibility of a discharge from the LTLW as alleged by the Regional Board, and much of their testimony establishes the exact opposite. In particular:

11) is unsupported by anything in the decades-long investigation of the LTLW. See Regional Board, GeoTracker, LTLW Site (Site No. SL0601754315), available at https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL0601754315. The index of the documents listed on the LTLW GeoTracker Site is included in Exhibit D. See also Staff Report at Figure 6 (showing a maximum PCE concentration of 12 mg/kg in soil, a mere 7% of the 170 mg/kg concentration one would expect from PCE burial). Fox suggests that the statement be stricken.

¹¹⁸ Staff Report at 9-10.

¹¹⁹ *Id.*

¹²⁰ See Opsahl Dep. (Nov. 22, 2002) at 117-18.

¹²¹ Staff Report at 12; see Opsahl Dep. at 35, 37, 47, 114.

¹²² See Opsahl Dep. at 35, 115-116.

¹²³ Staff Report at 12-15 § 2.2.8.

- Nance testimony. The Regional Board cites this testimony from the operator of long-time dry cleaning business owner in an attempt to establish that it was common for dry cleaners to dispose of separator wastewater in the sewer,¹²⁴ but that has nothing to do with the spill and contamination alleged in this case—i.e., a spill in the parking lot. It also appears that Nance did not have any experience with coin-operated dry cleaning units.¹²⁵ Moreover, Nance testified that despite nearly 40 years in the dry cleaning business, he did not believe PCE was present in wastewater discharged to sewers, he was never told by local authorities that sewers leaked, his operations were inspected regularly by the state without any concerns being expressed, and he never observed any PCE being spilled during delivery.¹²⁶
- Caulk testimony. The Regional Board cites this testimony for the proposition that PCE spills, leaks, and drips occurred from dry cleaning machine gaskets and seals,¹²⁷ but it appears that Caulk believed that these leaks resulted in air emissions as opposed to discharges of PCE liquids.¹²⁸ Likewise, there is no evidence that Caulk was familiar with coin-operated dry cleaning units.¹²⁹ Despite his long history as a dry cleaning business owner and operator and as an employee distributing dry cleaning equipment, Caulk was not aware of groundwater contamination resulting from dry cleaning operations until the early 2000s.¹³⁰
- Ramirez testimony. The Regional Board cites this testimony to establish that PCE “muck,” or diatomaceous earth, was commonly disposed of in the trash, and that once a hose on the filter of some dry cleaning equipment ruptured, resulting in a spill.¹³¹ However, neither Hakansson nor Baisley indicated that they disposed of PCE muck in the trash, and such a disposal would have nothing to do with the type of discharge alleged here. In any event, the fact that Ramirez observed a single (indoor) hose rupture in his 21-year career in the dry cleaning business suggests that such occurrences were, at most, exceedingly rare, and it would be unreasonable to assume that a landowner should have known about them.¹³²

¹²⁴ *Id.* at 12 § 2.2.8.1.

¹²⁵ Transcript of Deposition of J. Nance (Aug. 23, 2001) (“Nance Dep.”) at 24-25, 35, 37-41, 122.

¹²⁶ *Id.* at 64, 73-74, 88, 186-187, 216.

¹²⁷ Staff Report at 12-13 § 2.2.8.2.

¹²⁸ Transcript of Deposition of L. Caulk (Jan. 23, 2002) (“Caulk Dep.”) at 94.

¹²⁹ *Id.* at 86-87.

¹³⁰ *Id.* at 18-26 (discussing long history in business), 95 (lack of knowledge of soil or groundwater contamination).

¹³¹ Staff Report at 13 § 2.2.8.4

¹³² Transcript of Deposition of G. Ramirez (Dec. 3, 2002) (“Ramirez Dep.”) at 191.

- Bakker testimony. The Regional Board cites this testimony to establish that dry cleaners disposed of PCE wastewater down the drain,¹³³ which is distinct from the type of discharge at issue at the LTLW. In any event, Bakker later testified he was not aware of dry cleaners disposing of PCE waste “down the drain.”¹³⁴
- Wooten testimony. The Regional Board cites this testimony to further establish that dry cleaners disposed of PCE wastewater down the drain, and to show that a spill once occurred during PCE delivery.¹³⁵ However, it appears that Wooten was only aware of potential air emissions associated with PCE during the 1970s and 1980s (and wore a mask to protect against them) but was not aware that PCE posed any other environmental hazard until the 1990s.¹³⁶
- Suggett testimony. The Regional Board cites this testimony in support of its claim that dry cleaners disposed of dry cleaner PCE waste in the dumpster,¹³⁷ but again, that allegation is unsupported by the record and irrelevant to the alleged discharge. Suggett’s testimony instead indicates that he believed that historical dry cleaner disposal practices were legal and “only recently” did he become aware of a dry cleaner’s potential to contaminate soil or groundwater.¹³⁸
- Landon testimony. The Regional Board cites this testimony in an attempt to show that dry cleaners disposed of separator wastewater into a drain.¹³⁹ Landon’s testimony was based on what could be observed “at a dry cleaning plant,” not from observing a coin-operated dry cleaning unit at a laundromat, and concerns sewer releases not at issue in this case. Moreover, Landon testified that the industry did not become aware of potential soil or groundwater contamination until the early 1980s¹⁴⁰ (after the relevant timeframe at issue in the case).
- McLemore testimony. The Regional Board cites this testimony to establish that dry cleaners disposed of PCE down the drain.¹⁴¹ His testimony was based on dry cleaner industry publications distributed by Dow to its customers, which largely discusses machine maintenance and potential sources of machine leaks.¹⁴² Not only is there no indication that a shopping center landlord and its general partner would have received

¹³³ Staff Report at 13 § 2.2.8.4.

¹³⁴ Transcript of Deposition of P. Bakker (Sept. 18, 2002) (“Bakker Dep.”) at 23-24.

¹³⁵ Staff Report at 14 § 2.2.8.5.

¹³⁶ Transcript of Deposition of B. Wooten (Sept. 12, 2001) (“Wooten Dep.”) at 176.

¹³⁷ Staff Report at 14 § 2.2.8.6.

¹³⁸ Transcript of Deposition of W. Suggett (Sept. 27, 2002) (“Suggett Dep.”) at 38-39.

¹³⁹ Staff Report at 14-15 § 2.2.8.7.

¹⁴⁰ Transcript of Deposition of S. Landon (Oct. 4, 2002) (“Landon Dep.”) at 110.

¹⁴¹ Staff Report at 15 § 2.2.9.

¹⁴² McLemore Dep. at 18-27.

such publications, but the publications themselves indicate that leaks are not readily discovered because PCE evaporates.¹⁴³

- **Beard testimony.** The Regional Board cites this testimony to establish that it was common knowledge that dry cleaners disposed of separator wastewater down the drains or on the ground.¹⁴⁴ Beard's testimony is irrelevant to the release alleged in this case. Moreover, Beard testified that regulatory agencies were approving sewer disposal until 1986 and that soil and groundwater contamination associated with dry cleaners did not become known until the 1990s.¹⁴⁵

f. **"PCE Manufacturer Evidence of Routine Operations Causing Contamination."**¹⁴⁶ The two citations in this section reiterate previously addressed points and are subject to the same distinctions described above. Further, the fact that some PCE manufacturers may have known of a particular "fact" does not establish what "common knowledge" a shopping center owner and its general partner would be expected to possess.

In short, the *City of Modesto* testimony and documents cited in the Staff Report are inapposite because they concern (1) unknown types of dry cleaning units or dry cleaning units other than coin-operated dry cleaning units; (2) dry cleaning practices as to which there is no evidence in this case and unrelated to the parking lot spill that caused the contamination at the LTLW; (3) potential hazardous (e.g., from inhalation) other than groundwater contamination nuisances; and (4) information from time periods other than 1974-1979/1980. In addition, and most importantly, there is not an iota of evidence to indicate that any of the information and documents cited by the Staff Report were known to, or should have been known to, Century 73 or Fox.

2. Other Evidence from the *City of Modesto* Record Undermines the Regional Board's Allegations that Century 73 and Fox "Should Have Known" of Discharges at the LTLW

The record from *City of Modesto* not only fails to support the Regional Board's liability theory, it actually demonstrates that even dry cleaning industry insiders did not know that dry cleaning practices would result in PCE discharges that could contaminate groundwater. In particular:

- An expert consultant on dry cleaning matters, and president of a dry cleaning equipment manufacturer from the 1960s to 1982, testified that his understanding was that neither EPA nor California regulated disposal separator water before 1980, that it was his

¹⁴³ *Id.* at 46-47, 108-09.

¹⁴⁴ Staff Report at 8 § 2.2.5.

¹⁴⁵ Transcript of Deposition of R. Beard (June 13, 2002) ("Beard Dep.") at 86-87, 95.

¹⁴⁶ Staff Report at 15 § 2.2.2.9.

understanding that “during the early 1980s the industry became aware of possible soil in [sic] groundwater contamination from spilled [PCE].”¹⁴⁷

- A former dry cleaner operator testified that it was not until the early 1990s that he remembers learning that PCE posed an environmental hazard, though earlier he had begun wearing a gas mask because he understood the health hazard of inhalation.¹⁴⁸
- An employee of a dry cleaning equipment distributor indicated he first learned of PCE groundwater contamination issues in the early 1980s, and did not recall any discussion in the late 1970s about activities his employer was undertaking concerning potential federal regulation of discharges by dry cleaners that may contain PCE.¹⁴⁹
- An employee of a dry cleaner manufacturer recalled that “even at that time [1986], EPA was still saying to the dry cleaning industry and dry cleaners separator waste water is not a problem, the amount is de minimis” and that “it would be quite unreasonable” to apply later-promulgated standards to earlier generations of operators.¹⁵⁰
- A Dow product steward and industry development manager, who worked for the company since the early 1980s, was unaware when the manufacturer first learned that PCE from dry cleaner operations could contaminate groundwater.¹⁵¹

In sum, there is no basis in the *City of Modesto* record to conclude that the general partner of a landlord of a laundromat or the landlord itself—much less the landlord of the LTLW tenants specifically—should have known that there was “a reasonable possibility of discharge” of PCE from the LTLW, that the discharge would go “into waters of the state,” and that such discharge into waters “could create or threaten to create a condition of nuisance,” as *United Artists* requires.¹⁵² To the contrary, the Staff Report’s references on the whole demonstrate that even industry insiders had no such understanding during the relevant time period.

¹⁴⁷ Landon Dep. at 102, 110.

¹⁴⁸ Wooten Dep. (Sept. 12, 2001) at 175-76.

¹⁴⁹ Opsahl Dep. at 35, 37, 47, 114.

¹⁵⁰ See Beard Dep. (Jan. 23, 2002) at 47-48.

¹⁵¹ See Hickman Dep. at 29.

¹⁵² *United Artists*, 42 Cal. App. 5th at 857, 864-65, 887 (“permitted” means an owner “knew or should have known that a lessee’s activity created a reasonable possibility of a discharge into waters of the state of wastes that could create or threaten to create a condition of pollution or nuisance”).

3. The *United Artists* Record, Local Ordinances, and Academic Literature Do Not Show that Century 73 and Fox Should Have Known of the Reasonable Possibility of a Discharge from the LTLW

While the Proposed Order relies chiefly on the *City of Modesto* record, it also invokes the *United Artists* record, various historical ordinances from around Lake Tahoe, and academic publications from the 1990s and 1940s, to try to support its claims.

The Regional Board's reliance on these materials is misplaced. First, the Staff Report cites the *United Artists* decision for the proposition that "it was well known that PCE was a hazardous substance" from 1972-1980.¹⁵³ It then quotes *United Artists*' reflection that "[t]he record [in that case] indicate[d] that the dangers of dry cleaning solvents in general, and PCE in particular, became gradually known during and after" that timeframe, and includes a block quote from the decision that lists regulatory actions from 1953 to 1980 that pertain in some way to PCE or dry cleaning solvents generally.¹⁵⁴

Even assuming that the *United Artists* court's descriptions are accurate, they do not establish that a 1970s landlord or its general partner had reason to know of discharges of PCE to groundwater associated with a coin-operated dry cleaning unit. Most of the court's citations merely reflect a government agency's understanding that PCE solvent vapors posed an inhalation hazard, not a risk of groundwater contamination.¹⁵⁵ The same is true of a 1969 report about the use of pesticides containing chlorinated hydrocarbons resulting in concerning bioaccumulation in birds and fish.¹⁵⁶ Likewise, neither a 1975 Santa Clara ordinance prohibiting discharges of pollutants directly into the sewer system, nor EPA action in 1978 and 1980 to recognize PCE generally as toxic and potentially carcinogenic,¹⁵⁷ evince a prevailing knowledge that dry cleaning activity inherently posed a reasonable possibility of a discharge to state waters resulting in groundwater contamination.

Second, the Staff Report cites several local ordinances as "evidence [of] the common knowledge that industrial wastes, such as separator wastewater or cooling water from dry cleaning stills, could contain dangerous substances, requiring restrictions."¹⁵⁸ That artful phrasing misleadingly suggests that dry cleaner wastes were known to be hazardous when the ordinances were adopted. The cited ordinances simply do not reflect that. In fact, the ordinances do not mention dry cleaning at all. Instead, they merely prohibit the discharge of industrial waste into sewers or the pollution of water supplies, without identifying what wastes were prohibited waste and what causes water pollution.

¹⁵³ Staff Report at 3.

¹⁵⁴ *Id.* (quoting *United Artists*, 42 Cal. App. 5th at 861-62).

¹⁵⁵ See *United Artists*, 42 Cal. App. 5th at 861.

¹⁵⁶ See *id.* at 862.

¹⁵⁷ See *id.*

¹⁵⁸ Staff Report at 19-20.

In fact, none of the ordinances cited by the Regional Board indicate that it was common knowledge that there was a reasonable possibility that a rarely used coin-operated dry cleaning unit would discharge waste into waters of the state resulting in a groundwater contamination nuisance. A 1956 South Tahoe Public Utility District (“STPUD”) ordinance prohibited anyone from “permitting” any “unpolluted industrial process waters” to enter “any sanitary sewer.”¹⁵⁹ As an initial matter, there is no indication that LTLW discharges to a sewer caused contamination,¹⁶⁰ and so a sewer ordinance could not have put anyone on notice of a reasonable possibility of groundwater contamination at the site. In addition, it is far from certain that this particular sewer ordinance even applied to the LTLW as it is unclear that discharges from a single coin-operated dry cleaning machine in a retail laundry constituted “unpolluted industrial process waters.” Further, a prohibition against permitting the discharge of unpolluted industrial process waters into a sanitary sewer (where it would presumably be conveyed to a treatment plant) does not constitute notice that PCE used by a dry cleaner would enter groundwater, let alone cause a groundwater contamination nuisance.

Similarly, STPUD ordinance’s separate prohibitions against sewer discharges that “constitute a hazard to human [sic] or animals, or create any hazard in the receiving waters of the sewage treatment plant,” or any “substance capable of creating a public nuisance,” are immaterial.¹⁶¹ The fact that it was unlawful to cause a nuisance does not establish “common knowledge” that infrequent filling or use of a coin-operated dry cleaning unit at the LTLW caused a nuisance or posed a reasonable possibility of causing a nuisance.

In citing the STPUD ordinance, as well as similar South Lake Tahoe ordinances, the Regional Board’s approach is akin to arguing that a landlord should know its tenant was violating a noise ordinance merely because a noise ordinance exists. An ordinance restricting noise provides notice that causing noise may be unlawful; it does not provide notice that particular activities cause noise or that noise is occurring at any particular location.

The two South Lake Tahoe ordinances cited by the Regional Board feature comparable general prohibitions¹⁶² and thus similarly fail to establish that it was common knowledge that dry cleaning activity posed a reasonable possibility of discharges to state waters that would cause a groundwater nuisance or groundwater pollution.

Lastly, the Proposed Order cites academic articles published in 1991 and 1998, as well as a 1942 article in a trade journal, for the proposition that “[k]nowledge of the risks of contamination from chemicals disposed of on the ground or into sewers predated operations at the [LTLW] by decades or even centuries.”¹⁶³ These articles say nothing about PCE and do not even mention

¹⁵⁹ *Id.* at 19 (quoting District Ordinance No. 24, § 7.1). The Proposed Order erroneously quotes Section 7.1 of the ordinance as referring to “unpolluted industrial process wastes” (emphasis added). *See id.*

¹⁶⁰ Technical Comments §§ 1.1, 2.6.

¹⁶¹ *Id.* (quoting STPUD Ordinance No. 24, § 7.2).

¹⁶² *Id.* at 20 (citing City of South Lake Tahoe Ordinances 1966-050 and 1970-249).

¹⁶³ *Id.* at 15-17.

dry cleaning activities. Rather, they simply state that over time, scientists began to understand that certain conduct could cause groundwater contamination; they do not establish that such conduct occurred at the LTLW, or that Century 73 or Fox knew or should have known about such conduct even if it occurred. They absolutely do not establish that Century 73 or Fox should have known of the reasonable possibility of a discharge to state waters resulting in groundwater contamination at the LTLW.

B. The Proposed Order Is Inconsistent with Prior Orders Imposing Liability Based on Constructive Knowledge

The Proposed Order departs from prior State Board precedents by seeking to impose liability based on mere speculation of a former landowner's knowledge. In *In re Logsdon*, the State Board found a former landowner liable under Section 13304 because it "had or should have had knowledge of the discharges of waste at the site" based on his extensive knowledge of the potential for discharges from the particular industry.¹⁶⁴ Similarly, in *In re Stuart*, the State Board found a former landowner liable because the threat of petroleum contamination from underground storage tanks was common knowledge in the industry in which both the landowner and tenant operated.¹⁶⁵ While these cases pre-date the *United Artists* decision, they show that even prior to that decision, the State Board predicated liability under Section 13304 on compelling evidence that the former landowner knew of the possibility of a discharge drawing upon its own industry-specific experience. Here, Century 73 and Fox were real estate companies, there is no evidence that they were in any way involved in the dry cleaner industry, and any assertion that they should have known of a possibility of a discharge from their laundromat tenant is based entirely on conjecture.

C. Century 73 and Fox Could Not Have Known of a Discharge at the LTLW Because It Pre-Dated Century 73's Ownership

The Proposed Order fails to explain how Century 73 or Fox "should have known" of discharges of PCE at the LTLW when compelling evidence indicates that no PCE discharges occurred during Century 73's ownership. Mrs. Hakansson has sworn, under penalty of perjury, that she is unaware of any PCE spills occurred during her tenancy the LTLW, which lasted from November 1973 to July 1976.¹⁶⁶ Mrs. Baisley testified that no spill of PCE occurred during her tenancy at the site from July 1976 through the date she and her husband gave the coin-operated dry cleaning unit away in 1979 or 1980.¹⁶⁷

¹⁶⁴ *In re Logsdon*, Cal. State Water Res. Control Bd., WQ No. 84-6, 1984 WL 19063, at *6 (July 19, 1984).

¹⁶⁵ *In re Stuart*, Cal. State Water Res. Control Bd., WQ No. 86-15, 1986 WL 25522, at *3, n. 2-3 (Sept. 18, 1986).

¹⁶⁶ 2022 Hakansson Declaration at ¶¶ 3-4; see 2017 Hakansson Declaration at ¶¶ 3-4; see also 1973 Hakansson Sublease (showing lease start date); 1976 Baisley Sublease (showing Baisley lease start date).

¹⁶⁷ Baisley Dep. at 56-62, 101, 136-37.

As a result, it is more likely than not that a discharge of PCE occurred prior to the Hakansson or Baisley tenancies, during the period between May 1972 (when the Prupas lease first authorized dry cleaning at the LTLW) and November 1973 (when the Hakansson sublease began), and prior to Century 73's ownership, which commenced in September 1974. That time frame would match the conclusions of Desert Research Institute, whose model (though flawed in other respects) indicates that spills at the LTLW commenced before 1973.¹⁶⁸ It also would be consistent with unrefuted evidence that (a) PCE was spilled in the parking lot at the South Y Shopping Center, and (b) asphalt was not installed in the parking lot until 1974.¹⁶⁹ Accordingly, a surficial spill between May 1972 and November 1973, when the ground was not paved, was more likely to reach the subsurface than one during Century 73's ownership of the South Y Shopping Center after September 1974.

In light of the compelling evidence that any PCE spill at the LTLW predated Century 73's ownership, Century 73 or Fox could not reasonably be expected to have known of the spill. A pre-November 1973 spill would not have been visible when Century 73 acquired the South Y Shopping Center in September 1974. As noted by the *City of Modesto* court, PCE is a colorless liquid and difficult to see once it has been released into soil.¹⁷⁰ Moreover, in the early 1970s, subsurface environmental investigations were unheard of, so Century 73 and Fox could not be expected to have learned of the spill through such efforts.¹⁷¹

Even if, contrary to the weight of the evidence, the Regional Board concludes that the PCE spill at the South Y Shopping Center occurred during Century 73's ownership, it is unlikely that Century 73 or Fox could have observed it. Mrs. Baisley testified that the coin-operated machine was used infrequently during her tenure, and thus the solvent used in the machine was rarely replaced. Specifically, Mrs. Baisley testified that delivery trucks delivered solvent to the facility only three or four times during the entire period of the Baisleys' ownership of the laundromat business.¹⁷² Accordingly, unless Century 73 or Fox happened to be on-site on the *one day* of the year that the PCE delivery truck delivered solvent, they would have missed seeing any spill.

Nothing in the Proposed Order explains the Regional Board's decision to completely ignore Mrs. Baisley's testimony on this critical point. In fact, the Regional Board repeatedly cites other aspects of Mrs. Baisley's testimony,¹⁷³ so it is clear that the Regional Board believes her to be a credible, reliable witness.

¹⁶⁸ DRI, *Fate and Transport Modeling of the South Y PCE Groundwater Contamination Plume* (June 28, 2019), at 5-6, Figure 18.

¹⁶⁹ See Baisley Dep. at Ex. 11 (AMB Investments, Inc., South Tahoe "Y" Shopping Center Post Closing Memorandum (Apr. 22, 1986)) at 17.

¹⁷⁰ *City of Modesto II*, 19 Cal. App. 5th at 137.

¹⁷¹ See, e.g., *In re Hemingway Transp., Inc.*, 174 B.R. 148, 169 (Bankr. D. Mass. 1994) (noting that even in 1983, "professional environmental site assessments were not yet common or customary").

¹⁷² See Baisley Dep. at 135.

¹⁷³ See Proposed Order at 2 ¶ 4 n.2; Staff Report at 2, 3, 17, 18.

D. The Regional Board Fails to Acknowledge that Impacts on Groundwater from Dry Cleaners Were Not Commonly Known in the 1970s

The Regional Board's assertion that Century 73 and Fox "should have known" of dry cleaner releases to groundwater is undermined by overwhelming evidence that in the 1970s, discharges to groundwater from dry cleaners were not commonly known. Indeed, one study indicates that PCE contamination from dry cleaners was first detected in the Central Valley in California in approximately 1984 as a result of state-mandated groundwater testing.¹⁷⁴ A 1992 publication by the Central Valley Regional Water Quality Control Board indicates that groundwater contamination from dry cleaning operations in California was first discovered in the late 1980s.¹⁷⁵ A publication of the State Coalition for Remediation of Drycleaners suggests the same.¹⁷⁶ Moreover, the first cleanup and abatement order published by the State Board that addresses groundwater contamination caused by a dry cleaner was issued in 1989, upholding a 1988 regional board order.¹⁷⁷

It is not credible to suggest, as the Regional Board does, that in the 1970s, a shopping center owner and its general partner would have or should have known of the reasonable possibility of discharges from a small, rarely used coin-operated dry cleaning unit present at a laundromat tenant space even though the state agency charged in 1970 with protecting the beneficial use of groundwater and preventing nuisances¹⁷⁸ was unaware of the potential for dry cleaning contamination at the hundreds of dry cleaners across the state.

E. Under Regional Board Precedents, Century 73 and Fox Cannot Be Liable for Permitting Discharges They Could Not Have Prevented

As the Regional Board recognizes, to establish liability under Section 13304, the Regional Board must establish "control" in addition to meeting *United Artist's* knowledge requirement.¹⁷⁹ The State Board has long held that a landlord may be named as a discharger under Section 13304 only "[i]f he knows of a discharge on his property and has sufficient control of the property to correct it."¹⁸⁰

¹⁷⁴ See Thomas K.G. Mohr, Santa Clara Valley Water District, Study of Potential for Groundwater Contamination from Past Dry Cleaner Operations in Santa Clara County (Sept. 20, 2007), at 142.

¹⁷⁵ See California Regional Water Quality Control Board, Dry Cleaners—A Major Source of PCE in Ground Water (Mar. 27, 1992), at 10, available at https://ustlowriskpolicy.org/wp-content/uploads/2012/04/1992_RWQCB-Rpt_Dry-Cleaners-A-Major-Source-of-PCE-in-GW.pdf (last visited Sept. 1, 2022).

¹⁷⁶ See State Coalition for Remediation of Drycleaners, A Chronology of Historical Developments in Drycleaning (Nov. 2007), at 4, available at <https://www.erisinfo.com/assets/Dry-Cleaning-Historical-Developments.pdf> (last visited Sept. 1, 2022).

¹⁷⁷ See *In re Spitzer*, Cal. State Water Res. Control Bd., Order No. WQ 89-8, 1989 WL 97148, at *9-10 (May 16, 1989).

¹⁷⁸ Cal. Water Code § 13241, added by Stats.1969, ch.482, p. 1061, § 18 (eff. Jan. 1, 1970).

¹⁷⁹ See Proposed Order at 17 ¶¶ 70, 72; *id.* at 18 ¶¶ 73, 75.

¹⁸⁰ *In re Spitzer*, State Board Order No. 89-88, at *3 (emphasis added).

The Proposed Order states that Century 73 “had knowledge of and control over the activities occurring at the [LTLW] that caused the discharge and had the legal ability to prevent the discharge.”¹⁸¹ As to Fox, the Proposed Order asserts only that Fox had “control over the activities occurring at the [LTLW]”¹⁸² and cites Fox’s supposed “ability to inspect the dry cleaning operation.”¹⁸³

The Regional Board has not demonstrated by a preponderance of the evidence that Century 73 or Fox had control over the activities at the LTLW or the ability to prevent any discharge that may have occurred at the LTLW. The lease provisions cited by the Regional Board do not establish control over LTLW operations,¹⁸⁴ and neither Century 73 nor Fox had any control over the delivery company that spilled PCE in the South Y Shopping Center parking lot. Moreover, regardless of any lease rights, Century 73 and Fox could at most only be expected to prevent contamination they knew or should have known about. As explained above, Century 73 and Fox did not know or have reason to know of any PCE being discharged into the environment from the LTLW’s operations. Indeed, Century 73 did not acquire the South Y Shopping Center until after the spill in the parking lot occurred, and, unlike the landlord in the State Board’s decision in *In re Spitzer*, Century 73 did not own the South Y Shopping Center at the time contamination was discovered many decades later.¹⁸⁵

The Regional Board’s reliance on the inspection provisions of the LTLW lease is also misplaced. In *Resolution Tr. Corp. v. Rossmoor Corp.*, a landowner leased its property (through a subtenant) to a gas station.¹⁸⁶ During the time that the gas station operator rented the property, substantial gasoline and diesel fuel leaks occurred, potentially violating the Water Code and the lease and contaminating the plaintiff’s neighboring property.¹⁸⁷ The plaintiff brought a nuisance claim against the landowner who had leased the property to the gas-station operator.¹⁸⁸ In finding that the landowner was not liable for creating a nuisance, the court specifically evaluated the circumstances under which a landlord has a duty to inspect for nuisances created by its tenant or subtenant.¹⁸⁹ The court stressed that “[t]he landlord need not take extraordinary measures or make unreasonable expenditures of time and money in trying to discover hazards unless the circumstances so warrant.”¹⁹⁰ On this basis, the court went on to conclude that there was no

¹⁸¹ Proposed Order at 18 ¶ 73.

¹⁸² *Id.*; *cf. id.* at 18 ¶ 72.

¹⁸³ See Staff Report at 3.

¹⁸⁴ Compare Staff Report at 18 (citing “Use of Premises,” “Compliance with Laws,” and “Right of Entry” provisions of lease) with *Resolution Tr. Corp. v. Rossmoor Corp.*, 34 Cal. App. 4th 93, 101-102 (1995) (finding defendant landlord “generally had no control over the occupation or operation of the premises, despite lease language authorizing use of the property as a gas station, requiring compliance with laws, and providing a right to entry).

¹⁸⁵ *In re Spitzer*, 1989 WL 97148, at *7-9.

¹⁸⁶ *Resolution Tr. Corp.*, 34 Cal. App. 4th at 98.

¹⁸⁷ *Id.* at 98–99.

¹⁸⁸ *Id.* at 98.

¹⁸⁹ *Id.* at 102–104.

¹⁹⁰ *Id.* at 103.

reason to find that the landlord should have known that its tenant's gas station operations had caused subsurface contamination of adjoining property.¹⁹¹

Here, spills of colorless PCE into an unpaved parking lot likely migrated to the subsurface before Century 73 purchased the South Y Shopping Center and would not have been detected by a reasonable inspection. As *Resolution Trust* demonstrates, Century 73 and Fox had no duty to undertake extraordinary measures, such as extensive and expensive soil and groundwater sampling, to discover any such latent, subsurface contamination at the property. That is especially true given that the risk of PCE contamination by dry cleaners was not generally known and subsurface environmental investigations were exceptionally uncommon in the 1970s.¹⁹² Indeed, nothing in the Regional Board's own investigation of the Regional PCE Contamination suggests that any of the 125 priority sources of PCE identified within the area impacted by the Regional PCE Contamination conducted subsurface investigations during the 1970s.¹⁹³

As a result, neither Century 73 nor Fox could have prevented a discharge from the LTLW and thus they cannot be liable for cleanup under Section 13304.

F. Fox Is Not Liable as the Former General Partner of Century 73

The Regional Board contends that Fox is liable as the former general partner of Century 73.¹⁹⁴ The Regional Board is mistaken. Under California law governing partnership dissolutions, Fox's liability as a general partner of Century 73 lapsed long ago.

Century 73 filed a certificate of dissolution with the California Secretary of State in April 1990 and filed a certificate of cancellation in June of the same year.¹⁹⁵ Under California law, when a

¹⁹¹ *Id.* at 103–04; see *Redevelopment Agency of the City of Stockton v. BNSF Railway Co.*, 643 F.3d 668, 675 (9th Cir. 2011) (whether landowners or landlords should have known about contamination depends on whether they reasonably should have inspected their property for contamination, and if so, whether the contamination was discoverable by a reasonable inspection); see also *id.* at 677 (Section 13304(a) is to be “construed harmoniously with the law of nuisance”).

¹⁹² See Section V-A, D, *supra*.

¹⁹³ AECOM, Regional Plume Characterization Summary Report at Appendix B (listing priority sites and associated rationales); Memorandum Re Summary of 13267 Site History Questionnaire as of July 26, 2019; see Regional Board, GeoTracker, Former Big O Tires Site (Site No. SL0601729739), available at https://geotracker.waterboards.ca.gov/profile_report?global_id=SL0601729739; Former Norma's Cleaners Site (formerly Hurzel Properties LLC) (Site No. SL0601790916), available at https://geotracker.waterboards.ca.gov/profile_report?global_id=SL0601790916; the South Y PCE Site (Site No. SL0601794942), available at https://geotracker.waterboards.ca.gov/profile_report?global_id=SL0601794942; and the South Y Regional Contamination Site (Formerly Lukin Wells 2 & 5) (Site No. T10000007984), available at https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000007984. The indices of the documents listed on these sites is attached as Exhibit D.

¹⁹⁴ See Proposed Order at 18 ¶¶ 73, 75.

¹⁹⁵ See Certificate of Dissolution – Limited Partnership, Century Properties Equity Fund 73 (filed Apr. 18, 1990); Certificate of Cancellation – Limited Partnership, Century Properties Equity Fund 73 (June 29, 1990).

partnership dissolves and publishes notice of the dissolution in the newspaper of the county where its principal office is located, potential claimants are barred from bringing claims after four years from the date of the notice.¹⁹⁶ Given the passage of time, Fox has been unable to determine whether notice of dissolution was published in 1990, but in the Regional Board's case, it does not matter because the Regional Board received actual notice of Century 73's dissolution no later than October 5, 2005.¹⁹⁷ Under longstanding precedent (and logic), there is no need for a partnership to prove it provided constructive notice of dissolution through a newspaper when the claimant received actual notice of dissolution.¹⁹⁸ Moreover, since at least 2008, California law has presumed that a person has notice of a limited partnership's dissolution 90 days after filing the certificate of dissolution or termination.¹⁹⁹ Accordingly, Fox's liability as a general partner of Century 73 was discharged no later than October 5, 2005, and perhaps well before that.

VI. THE PROPOSED ORDER WOULD IMPERMISSIBLY IMPOSE LIABILITY FOR LAWFUL PRE-1981 ACTS

The Proposed Order is improper because it seeks to impose liability on Fox in violation of the provisions of Section 13304(j) of the Water Code. That section provides that Section 13304 "does not impose any new liability for acts occurring before January 1, 1981, if the acts were not in violation of existing laws or regulations at the time they occurred." As the State Board has explained, "[I]liability for past discharges has been limited by Amendment 6 which provides that Section 13304 does not impose any new liability for acts occurring before the effective date of the Porter-Cologne Water Quality Control Act."²⁰⁰

The Regional Board concedes that the coin-operated dry cleaning unit was removed from the LTLW in 1979 or 1980.²⁰¹ Accordingly, any "acts" relating to the use of that unit occurred prior to January 11, 1981, and thus Century 73 and Fox cannot be liable under Section 13304 unless they would have been liable under the version of the Section 13304 in existence prior to January 11, 1981. At that time, and dating back to a 1971 amendment, Section 13304(a) provided:

Any person who discharges waste into the waters of this state in violation of any waste discharge requirement or other order issued by a regional board or the state board, or who intentionally or negligently causes or permits any waste to be discharged or deposited where it is, or probably will be, discharged into the waters

¹⁹⁶ See Cal. Corp. Code § 15908.07.

¹⁹⁷ See B. Beard, Letter to H. Singer (Regional Board), L. Dernbach (Regional Board) and S. Blum (State Board), Re: LTLW (Oct. 5, 2005) (attaching Century 73's dissolution documents as Exhibits 3 and 4).

¹⁹⁸ *Carvalho v. McCoy*, 128 Cal. App. 2d 702, 705 (1954) (upholding dismissal of claim against former partner where plaintiff had actual knowledge of dissolution of partnership); *Lovejoy v. Spafford*, 93 U.S. 430, 440-42 (1876) ("actual notice" to claimant of dissolution bars recovery against former partner).

¹⁹⁹ Cal. Corp. Code § 15901.03(d)(2)-(3).

²⁰⁰ W. Atwater (State Board, Chief Counsel), Letter to R. Monogan, California Manufacturer's Association) (June 11, 1980) at 2.

²⁰¹ See, e.g., Proposed Order at 2 ¶ 5, 17 ¶ 71.

of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up such waste or abate the effects thereof or, in the case of threatened pollution or nuisance, take other necessary remedial action.²⁰²

The Regional Board has not alleged, let alone established by a preponderance of the evidence, that Century 73 or Fox are liable under this prior standard of liability, and thus the Proposed Order is unlawful on that basis.

VII. THE PROPOSED ORDER IMPROPERLY IMPOSES LIABILITY ON FOX UNDER SECTION 13267

A. Section 13267 Does Not Authorize the Regional Board to Require Cleanup

Water Code Section 13267 provides:

(a) A regional board, in establishing or reviewing any water quality control plan or waste discharge requirements, or in connection with any action relating to any plan or requirement authorized by this division, may investigate the quality of any waters of the state within its region.

(b) (1) In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires.²⁰³

By its plain language, Section 13267 authorizes the Regional Board to require investigation in the form of technical and monitoring reports, but it does not authorize cleanup and abatement orders.²⁰⁴

Notwithstanding the clear statutory language, the Proposed Order references both Section 13304 and Section 13267 when requiring Fox to “investigate, cleanup the waste and abate the effects of

²⁰² See Assembly Bill 2700 (Mar. 3, 1980) at 5 (reflecting pre-1980 version of Section 13304, along with amendment’s proposed changes); see also *United Artists*, 42 Cal. App. 5th at 869–70.

²⁰³ Cal. Water Code § 13267(a)-(b)(1) (emphasis added).

²⁰⁴ Regional Board’s Opposition Brief, *Fox v. Reg’l Bd.*, at 33 (agreeing that “section 13267 only authorizes the Regional Board to require an investigation of contamination, while Section 13304 authorizes the Regional Board to require cleanup and abatement”); see *Schellinger Bros. v. Cotter*, 2 Cal. App. 5th 984, 1003-04 & n.16 (2016) (noting that a regional board may require reports under Section 13267(b)(1) and order cleanup under Section 13304(a)).

waste.’²⁰⁵ To the extent the Proposed Order relies on Section 13267 to impose cleanup obligations on Fox, it exceeds the Regional Board’s authority and must be withdrawn.²⁰⁶

B. Neither Fox Nor Century 73 Is Liable as a Discharger Under Section 13267

Without analysis, the Proposed Order assumes that Fox is liable under Section 13267 if it is liable under Section 13304.²⁰⁷ For the reasons set forth above, neither Fox nor Century 73 is liable under Section 13304, and so, under the Regional Board’s approach, neither is liable under Section 13267.

In addition, neither Fox nor Century 73 is liable under Section 13267 for the independent reason that Section 13267 imposes liability on a different class of parties than Section 13304. Whereas Section 13304 holds liable a party that “caused or permitted” a discharge, Section 13267 imposes liability on a “person *who has discharged, discharges, or is suspected of having discharged or discharging*” waste.²⁰⁸ Under *United Artists*, Section 13304’s use of the word “permitted” shows the Legislature was focused on a party’s knowledge of a discharge, while Section 13267’s use of active verbs (“discharged,” “discharging”) shows that liability under Section 13267 depends upon a party’s affirmative conduct. Agencies are required to construe statutes in accordance with their plain meaning.²⁰⁹ If the Legislature had wanted Sections 13267 and 13304 to have an identical scope, it would have used the same words in both statutes.²¹⁰ Conversely, when the Legislature uses different terms in provisions of the same statute, it is presumed that it intends that the different terms have different meanings.²¹¹

There is nothing in Section 13267’s legislative history that suggests that the statutory language should be construed contrary to ordinary canons of statutory construction. Instead, the legislative history confirms that the Legislature was focused on ensuring, in both Section 13267 and its pre-1969 predecessor-statute, former Section 13055, that dischargers, past dischargers, and suspected dischargers were covered by the statute; there is no indication that the Legislature ever intended to require technical and monitoring reports from persons that that “permitted” discharges by others.²¹²

²⁰⁵ See Proposed Order at 13-14 , 20.

²⁰⁶ See Minute Order, *Seven Springs v. Reg’l Bd*, Case No. SC20180061, at 10-11 (recognizing that Sections 13267 and 13304 have different standards and confer different powers on the Regional Board, and that liability under each must be proven and reviewed independently).

²⁰⁷ See Proposed Order at 1.

²⁰⁸ Compare Cal. Water Code § 13304(a) with *id.* § 13267(b)(1) (emphasis added).

²⁰⁹ See, e.g., *People v. Tindall*, 24 Cal. 4th 767, 772 (2000) (quoting *Lennane v. Franchise Tax Bd.*, 9 Cal. 4th 263, 268 (1994)) (further internal quotation marks omitted); *Solberg v. Superior Ct.*, 19 Cal. 3d 182, 198 (1977).

²¹⁰ See *Brown v. Kelly Broad. Co.*, 48 Cal. 3d 711, 725 (1989).

²¹¹ See, e.g., *Kleffman v. Vonage Holdings Corp.*, 49 Cal. 4th 334, 342 (2010).

²¹² See 1992 Cal. Legis. Serv. Ch. 729 (S.B. 1277) (West); Assembly Bill 1517, Ch. 1149, Stat. 1951, Inter-Departmental Communication from the Office of the Attorney General to Governor Warren (June 12, 1951), at 2 (explaining that the addition of the technical reports requirement was intended to empower regional boards to

Construing Section 13267 in accordance with its plain meaning results in a sensible legislative scheme. Under Section 13267, the Regional Board may require actual dischargers—the most culpable and directly knowledgeable parties—to shoulder the initial responsibility and incur the up-front costs of investigating the extent of the pollution. Once those steps are completed, responsibility is spread under Section 13304 among both the dischargers and additional persons who permitted the discharge.

By contrast, construing Section 13267 as imposing liability on a property owner for discharges caused by others would greatly expand the Water Code’s reach. Under the Regional Board’s approach, if landlords are covered by Section 13267 because they are deemed to be “dischargers” based on the activities of their tenants, then landlords also would presumably be required to file waste discharge reports under Section 13260 of the Water Code and to comply with any discharge and permitting requirements issued under Section 13263.²¹³

The Regional Board’s interpretation is especially concerning when it is read in conjunction with the Regional Board’s apparent view that Century 73 and Fox are liable under Section 13267 because preexisting contamination migrated under the South Y Shopping Center during Century 73’s ownership.²¹⁴ Under that reading, a homeowner could similarly be held liable under Section 13267 as a “person who has discharged” contamination that passively migrates beneath her home from a neighboring factory. Had the Legislature intended to impose liability on a “person who owns property to which a discharge has migrated,” it is hard to believe it would have chosen the words “person who has discharged” to achieve that result.

Properly construed, Section 13267 imposes liability only on parties that are discharging, have discharged, or are suspected of having discharged wastes into waters of the state. As the Proposed Order does not even allege, let alone establish, that Fox or Century 73 engaged in any of those activities, they cannot be liable for preparing the investigative or technical reports required by the Proposed Order.

C. The Regional Board Has Not Complied with Section 13267’s Requirements

Section 13267 mandates that “[t]he burden, including costs” of an order issued under its authority “shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports.”²¹⁵ It further requires the Regional Board to issue “a written explanation with regard to the need for the reports.”²¹⁶ The El Dorado Superior Court invalidated portions of the 2017 CAO precisely because the Regional Board failed to comply

determine whether those subject to discharge requirements were complying with in compliance with those requirements).

²¹³ See Cal. Water Code §§ 13260(a)(1), 13263(a).

²¹⁴ See, e.g., Proposed Order at 3 ¶ 7, 17 ¶ 69; Staff Report at 27, 55.

²¹⁵ Cal. Water Code § 13267(b)(1).

²¹⁶ *Id.*

with these requirements.²¹⁷ In particular, the court held that under Section 13267, the Regional Board “must disclose in the order the Board’s mode of analysis and the basis for its conclusion that the statutory requirement that the burden, including costs, of these reports bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports is satisfied.”²¹⁸ It found the 2017 CAO “defective” because “[w]hile the subject order stated why the technical and monitoring reports are necessary, the order contained no discussion about the burden and costs bearing a reasonable relationship to the need for the report and the benefits to be obtained from the reports.”²¹⁹ The court therefore instructed the Regional Board to “set forth findings to bridge the analytic gap between the raw evidence and ultimate decision that the burden, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.”²²⁰

Despite the fact that the Regional Board previously accepted the Superior Court’s ruling and chose not to appeal it, the Regional Board now suggests that the subsequent decision of the Court of Appeal in *Sweeney v. Cal. Reg’l Water Quality Control Bd.*, 61 Cal. App. 5th 1093 (2021), somehow narrowed Section 13267’s requirements. To the contrary, the court reaffirmed that Section 13267’s “plain language makes clear that in order to require a discharger to provide the Board with any technical report, the Board must (1) provide ‘a written explanation with regard to the need for the reports;’ and (2) ‘identify the evidence that supports requiring that person to provide the reports.’”²²¹ The court also reaffirmed “the requirement that the burden of reports be proportional to their anticipated benefit” and found that the Regional Board had “included dozens of findings to explain the need for the technical reports.”²²²

The Proposed Order fails to comply with Section 13267’s requirements. As explained in the Technical Comments, the Regional Board has not adequately assessed the costs associated with complying with the Proposed Order’s investigation requirements, and there is insufficient evidence that the Proposed Order’s costs “bear a reasonable relationship” to the need for the reports and the supposed benefits to be obtained from the reports.²²³

Moreover, even if there were adequate justification for requiring the investigative reports sought by the Regional Board, the Regional Board has failed to “identify the evidence that supports requiring” Fox to be “th[e] person to provide the reports,” as required by *Sweeney*. In *Sweeney*, the court identified compelling reasons why the respondent should conduct the investigation mandated by the Regional Board:

The Board concluded Sweeney had engaged in numerous unauthorized activities at the Site related to his unauthorized levee construction. The Board found these

²¹⁷ Minute Order, *Seven Springs v. Reg’l Bd.*, Case No. SC20180061 (Nov. 5, 2020) at 42–47.

²¹⁸ *Id.* at 42–43.

²¹⁹ *Id.* at 45, 47.

²²⁰ *Id.* at 47.

²²¹ *Sweeney*, 61 Cal. App. 5th at 1114 (emphasis added).

²²² *Id.* at 1114–1115.

²²³ Technical Comments § 7.

unauthorized construction activities removed crucial tidal flow to the Site's interior, and caused its tidal marsh areas to dry out and vegetation to die off. The Board found Sweeney, without authorization, discharged fill material into tidal waters at the Site. It further found Sweeney's unauthorized activities "adversely impacted beneficial uses at the Site including estuarine habitat, fish migration, preservation of rare and endangered species, fish spawning, wildlife habitat, and commercial and sport fishing."²²⁴

The Regional Board has made no similar findings regarding Fox in the Proposed Order. The Proposed Order does not even allege that Century 73 or Fox engaged in "unauthorized activities" that resulted in discharges at the LTLW, and Fox has even less connection to the Regional PCE Contamination, which derives from multiple off-site sources and not to any appreciable measure from PCE discharged at the LTLW.²²⁵

Not only did Fox not cause the Regional PCE Contamination, it is a poor choice to be "that person" that investigates it. Fox does not know the history of PCE use at the properties to be investigated, and certainly is not as familiar with those properties as each of the current property owners. In addition, Fox does not own or have access to any of the properties within the area impacted by the Regional PCE Contamination that the Regional Board wants to investigate, which means that, at best, any investigations conducted by Fox would be confined to public rights of way at a distance from actual on-site sources of PCE discharges. Finally, unlike the owners of the properties that contributed to the Regional PCE Contamination, Fox has already incurred millions of dollars cleaning up a property it did not pollute under an order that a California court has invalidated.

Because the Proposed Order fails to properly assess investigation costs, imposes burdens that do not bear a reasonable relationship to any benefit, and unfairly assigns those burdens to Fox, the Proposed Order does not comply with Section 13267 and must be withdrawn.

VIII. THE PROPOSED ORDER'S EXPANSIVE SCOPE IS IMPROPER

A. The Proposed Order Unlawfully Requires Fox to Address Discharges from Other Sources

Even if Fox were liable under either Section 13304, the Proposed Order would still be improper insofar as it purports to impose liability for the cleanup of contamination that did not originate from the LTLW.

Again, the language of the statute is instructive. Section 13304 provides that any person "who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state

²²⁴ *Sweeney*, 61 Cal. App. 5th at 1113.

²²⁵ Technical Comments §§ 2, 3.

and creates, or threatens to create, a condition of pollution or nuisance, shall, upon order of the regional board, clean up the waste or abate the effects of the waste”²²⁶ As the Court of Appeal recognized in *United Artists*, this provision establishes that “a prior owner of property may be required to participate in the cleanup of wastes discharged from its property that resulted in ground water contamination.”²²⁷

The court’s description of the statute reflects the only natural reading of Section 13304, which is that a person who causes or permits a discharge of waste is responsible for cleaning up only “the waste” that they caused or permitted to be discharged. In Section 13304, the word “the” is used as “determiner,” a “definite article . . . (*the* in English) that introduces a noun phrase and implies that the thing mentioned has already been mentioned, or is common knowledge, or is about to be defined’.”²²⁸ Here, the repeated use of the phrase “the waste” near the end of the passage refers back to the previously referenced “any waste” that the person caused or permitted to be discharged. Thus, while Section 13304 expressly authorizes the Regional Board to require a person to clean up a waste discharge that it caused or permitted, it just as clearly does not provide authority for ordering a person to clean up waste discharges caused or permitted by others. When, as here, the plain language of the statutory text is unambiguous, then the text is dispositive and there is no need for further construction.²²⁹

Construing Section 13304 otherwise would mean that parties who permitted a discharge into waters of the state would effectively be jointly and severally liable for addressing both commingled and even un-commingled contamination from other sources. Had the Legislature intended to render parties found liable under Section 13304 jointly and severally liable for the full cost of remediating groundwater plumes originating from multiple sources, it surely would have used different language. Section 13304 makes no mention of joint and several liability, and there is no reference in the statute to cleaning up contaminated properties without regard to source. Instead, Section 13304 merely requires cleanup of “the waste” and abatement of the effects of “the waste” that the liable party caused or permitted to be discharged.

When the Legislature wanted to impose expansive joint and several liability, it made that intent clear. As the *City of Modesto* court recognized, the Legislature incorporated CERCLA’s “joint and several” liability scheme into the Hazardous Substances Account Act (“HSSA”), but imposed a different liability standard under Section 13304 of the Water Code.²³⁰

²²⁶ Cal. Water Code § 13304(a) (emphases added).

²²⁷ *United Artists*, 42 Cal. App. 5th at 857 (emphasis added).

²²⁸ *Guidance Endodontics, LLC v. Dentsply Int’l, Inc.*, 749 F. Supp. 2d 1235, 1267–68 (D.N.M. 2010) (quoting the New Oxford American Dictionary).

²²⁹ See, e.g., *Tindall*, 24 Cal. 4th at 772; *Solberg*, 19 Cal. 3d at 198.

²³⁰ *City of Modesto*, 19 Cal. App. 5th at 143–144, 158. The fact that the Legislature intended different liability standards to apply is evident from the fact that HSAA and Section 13304 were amended on the same day as part of the same legislation but yet employed different language. See Senate Committee on Health and Welfare, Staff Analysis of Assembly Bill 2700 (McCarthy), As Amended May 19, 1980, at 2.

Imposing liability on Fox for the cleanup of contamination originating from the numerous properties that caused the PCE Regional Contamination is inconsistent with the purposes of Section 13304. As the Court of Appeal in *United Artists* recognized, one of the purposes of Section 13304 is to ensure that “persons who profit from discharges (directly or indirectly) will bear the cleanup costs.”²³¹ Requiring Fox to clean up contamination that was caused or permitted by other parties means that numerous parties that profited from discharges—including parties that actually caused contamination through their own actions—will avoid liability for their activities. Far from encouraging “greater vigilance on the part of property owners” and deterring pollution, the Regional Board’s approach would have the opposite effect, contrary to the statute’s purpose.²³²

Even if the Regional Board were to somehow conclude that the remedial purpose of Section 13304 supported imposing draconian liability on Fox for contamination caused by others, the language of the statute still controls. As the Supreme Court has recognized, even a cleanup statute’s broad remedial purpose cannot override the statute’s text.²³³ Here, the statutory text clearly limits liability to cleanup of “the waste” the party caused or permitted to be discharged, and the Regional Board has no authority to impose liability beyond the statute’s terms, even if it thinks doing so serves the statute’s broader purpose.

As explained in the attached Technical Comments, there is compelling evidence in the record that there has been no appreciable migration of PCE from the LTLW, and incontrovertible evidence that the Regional PCE Contamination is derived from multiple sources.²³⁴ Any order that seeks to impose liability on Fox under Section 13304 for that contamination would be unlawful.²³⁵

B. The Proposed Order Improperly Requires Duplicative Work

On the same date that it published the Proposed Order, the Regional Board published proposed orders for the Former Big O Tires and Former Norma’s Cleaners Sites.²³⁶ In those proposed

²³¹ *United Artists*, 42 Cal. App. 5th at 888.

²³² *Id.* at 880.

²³³ See *CTS Corp. v. Waldburger*, 573 U.S. 1, 12 (2014).

²³⁴ Technical Comments § 2.4. Our analysis of Section 13267 is similar. There is nothing in that statute that suggests that the Regional Board may require a party to investigate another party’s discharges.

²³⁵ Notably, the Regional Board seems to have previously recognized that responsible parties are not liable for “orphan shares.” See P. Kouyoumdjian (Regional Board Executive Officer), Cover Letter to 2017 CAO (May 17, 2017) at 2 (“It is also possible that there are portions of the PCE plume that we are unable to tie back to a responsible party, and I want to better understand the orphan share of the regional plume if we determine, from the required investigation results, that other sources have contributed to the PCE contamination.”)

²³⁶ Regional Board, Cleanup and Abatement Order No. R6T-2022-(PROPOSED) Former Big O Tires, APN 023-523-008-000, 1961 Lake Tahoe Boulevard, South Lake Tahoe, CA, Site Cleanup Program No. T6S034, Geotracker Global Id No. SI0601729739 (June 16, 2022) (“Big O Proposed Order”); Cleanup and Abatement Order No. R6T-2022-(PROPOSED, Former Norma’s Cleaners, APN 023-191-21, 961 Emerald Bay Road (Formerly 949 Emerald Bay Road) South Lake Tahoe, CA, Site Cleanup Program No. T6S044, Geotracker Global No. SL0601790916 (June 16, 2022) (“Norma’s Cleaners Proposed Order”).

orders, as well as in prior orders issued with respect to those sites, the Regional Board required responsible parties for the Former Big O Tires and Former Norma's Cleaners Sites to investigate and/or remediate PCE releases that resulted in groundwater contamination emanating from those sites.²³⁷ Even putting to one side the fact that the Regional Board does not have authority to require Fox to investigate and remediate contamination from other sites, it is unreasonable for the Regional Board to require multiple parties to complete overlapping work under separate orders following separate time schedules. If the Regional Board does not revise the Proposed Order to eliminate requirements for work relating to the Regional PCE Contamination, it should, at a minimum, make clear that the Proposed Order does not apply to contamination at or migrating from the Former Big O Tires and Former Norma's Cleaners Sites.²³⁸

C. The Proposed Order Unlawfully Requires Fox to Perform Work in Places Where Fox Lacks Access and to Destroy Property it Does Not Own

The Proposed Order is unreasonable to the extent it requires Fox to perform work on properties to which Fox has no access. The "Required Actions" section of the Proposed Order requires installation of wells and remediation equipment throughout an area that is a 1 mile long and 1.5 miles wide.²³⁹ Moreover, the Proposed Order requires Fox to develop a "plan to evaluate and destroy any vertical conduits (e.g., water supply and/or monitoring wells) within the regional PCE plume that allow the downward migration of COCs" and a "plan to mitigate any threats to human health at the [LTLW] or off-Site via the vapor intrusion to indoor air pathway."²⁴⁰ Under those mandates, Fox would not only need to access property that it does not own, but it would then need to undertake intrusive work on those properties, including actually "destroy[ing]" property owned by others. The Proposed Order unreasonably fails to condition any of these requirements on Fox's ability to secure permission to gain access to, and destroy, property owned by others. The Proposed Order also fails to explain where or how the Water Code authorizes the Regional Board to require that Fox destroy the property of others under the guise of "abatement."

D. The Regional Board Exceeded Its Authority in Dictating the Content of the Conceptual Site Model

The Regional Board asserts that the current LTLW conceptual site model ("CSM") adopted by Seven Springs and Fox "is both incomplete and inaccurate, and must be updated."²⁴¹ The Regional Board then requires Seven Springs and Fox to develop and submit a new CSM that, among other things:

²³⁷ Big O Proposed Order at 12 ¶ 27.h-k; Norma's Cleaners Proposed Order at 6 ¶ 16.

²³⁸ In a similar vein, Fox should not be required to perform work that is being undertaken by the Regional Board's consultant. AECOM reports that it has been authorized to undertake a review of vertical conduits within the area impacted by the Regional PCE Contamination. Regional Plume Characterization Summary Report at 12. The Proposed Order is improper to the extent it requires Fox to repeat this work.

²³⁹ Proposed Order at 3 ¶ 6 & Figure 8.

²⁴⁰ *Id.* at 20.

²⁴¹ *Id.* at ¶ 35.

Acknowledge[s] 1) off-Site migration of PCE contamination has occurred in the past, and is still occurring, 2) the regional PCE plume originates at the [LTLW] and continues without interruption to the Tahoe Keys (and potentially beyond), 3) the regional PCE plume has impaired the MUN beneficial use of groundwater, 4) PCE containment transport from the Site has occurred since the initial release that occurred over 40 years ago and is still occurring despite the operation of the AS/SVE system since 2010, 5) the AS/SVE system does not remediate the full extent of soil, soil vapor and groundwater contamination currently identified on-Site which has resulted in the discharge of PCE off-Site, 6) an effective lithologic barrier to inhibit downward migration of PCE contamination in groundwater does not exist at the [LTLW] and there is a hydraulic connection between shallow and middle water bearing zones, and 7) the [LTLW] meets all of the Dischargers' PCE source criteria defined and is a PCE source contributing to the regional PCE plume.²⁴²

It is improper and inappropriate for the Regional Board to dictate the contents or bounds of a CSM. Subject only to two limited exceptions not relevant here, the Water Code constrains the Regional Board's (and State Board's) involvement in such matters:

No waste discharge requirement or other order of a regional board or the state board or decree of a court issued under this division shall specify the design, location, type of construction, or particular manner in which compliance may be had with that requirement, order, or decree, and the person so ordered shall be permitted to comply with the order in any lawful manner.²⁴³

The State Board has previously explained that:

Section 13360 of the Water Code expressly prohibits Boards from telling a discharger the manner in which he must comply with any order issued. The Boards can only identify the problem and direct the person to take steps to abate or avoid it altogether. The ultimate measures taken are left to the discharger.²⁴⁴

By the plain language of Section 13360 and in accordance with the State Board's own interpretation, Fox can comply with the Proposed Order's requirement that Fox prepare a CSM *in any lawful manner*, but the Regional Board cannot dictate the "particular manner" by which Fox complies with that portion of the Proposed Order. By dictating specific assumptions that it requires to be in Fox's CSM, the Regional Board has exceeded its authority under the Water Code.

²⁴² *Id.* at 5 ¶ 20.

²⁴³ Cal. Water Code § 13360.

²⁴⁴ W. Atwater (State Board Chief Counsel), Letter to R. Monogan (Calif. Manufacturers Association) (June 11, 1980) at 2.

The Proposed Order’s requirements also improperly encroach on the role of Fox’s environmental consultant. The Proposed Order requires Fox to hire “an appropriately experienced California registered professional civil engineer or geologist” to prepare—and sign—“all reports” required under the Proposed Order, in accordance with California Business and Professions Code §§ 6735, 7835, and 7835.1.²⁴⁵ Under the same paragraph, “the authorized representative” must certify under penalty of law that he or she “has examined and is familiar with the report and that to his knowledge, the report is true, complete, and accurate.”²⁴⁶ Similarly, the Proposed Order requires Fox to affix the following statement to all reports it submits:

I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.²⁴⁷

Accordingly, the Proposed Order requires Fox to certify under penalty of perjury, and Fox’s consultant to certify under penalty of law, that the Regional Board’s CSM inputs are “true, accurate, and complete.” It would be impossible for Fox and its consultants to make such a certification where, as here, the Regional Board’s CSM does not comport with known facts, sound science and, in some cases, the Regional Board’s prior pronouncements.²⁴⁸

E. The “Threat” of Vapor Intrusion Is Not a “Public Nuisance Per Se” and Cannot Justify the Proposed Order

The first paragraph of the Proposed Order includes the following sentence: “The presence of elevated levels of COCs in soil, soil vapor, and groundwater and the threat of vapor intrusion caused by these contaminants constitutes a public nuisance per se because the pollution occurred as a result of discharges of wastes in violation of the WC.”²⁴⁹ The Regional Board’s argument that the threat of vapor intrusion constitutes a public nuisance is not supported by law.

²⁴⁵ Proposed Order at 32, RA ¶ 12.

²⁴⁶ *Id.*

²⁴⁷ *Id.* at 34 ¶ 20 (emphasis added).

²⁴⁸ *See, e.g.*, Technical Comments § 2.4 (regarding off-site migration); *id.* § 2.3 (regarding evidence that the regional plume is not a single, contiguous, uninterrupted plume).

²⁴⁹ Proposed Order at 2 ¶ 1 (emphasis added); *see also id.* at 16 ¶ 65.

Under applicable cases, “to be considered a nuisance per se[,] the object, substance, activity or circumstance at issue must be *expressly declared* to be a nuisance by its very existence by some applicable law.”²⁵⁰

Water Code Section 13050(m) defines nuisance as follows:

(m) “Nuisance” means anything which meets all of the following requirements:

- (1) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
- (2) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
- (3) Occurs during, or as a result of, the treatment or disposal of wastes.

Subsections (1) and (2) of this definition mirror the California Civil Code definitions of nuisance and public nuisance.²⁵¹ Subsection (3) is unique to the Water Code. Subsection (3) merely clarifies that the standard Civil Code definitions of nuisance apply to circumstances involving treatment or disposal of wastes; it does nothing to expand the requirements laid out in subsections (1) and (2).

The Water Code’s definition of nuisance does not “expressly declare” threatened vapor intrusion impacts (or any threatened impacts, for that matter) to be a nuisance. Rather, to be considered a nuisance under the Water Code, the circumstance at issue must be injurious to health, indecent or offensive to the senses, or an obstruction to the free use of property. None of the cases cited in the Staff Report say otherwise.²⁵² Accordingly, the language in the Proposed Order asserting that “threat of vapor intrusion” constitutes a public nuisance per se should be stricken, as should any requirements imposed under the Proposed Order on that basis of that erroneous legal conclusion.

F. The Proposed Order Improperly Restricts the Use of Bottled Water

The Proposed Order “acknowledges that providing bottled water to residences or businesses currently served by affected wells would, on its face, satisfy the requirement for uninterrupted replacement water service, specifically since the beneficial use affected is water for consumptive purpose and bottled water could meet this need.”²⁵³ The Proposed Order then goes on to add that

²⁵⁰ *Beck Dev. Co. v. S. Pac. Transp. Co.*, 44 Cal. App. 4th 1160, 1206–1207 (1996) (emphasis added); *see also People v. ConAgra Grocery Prod. Co.*, 17 Cal. App. 5th 51, 114 (2017).

²⁵¹ *See* Cal. Civil Code §§ 3479 and 3480.

²⁵² *See* Staff Report at 19 (citing *Newhall Land & Farming Co. v. Superior Court*, 19 Cal. App. 4th 334, 341 (1993), and *San Diego Unified Port District v. Monsanto Company*, Case No.: 15-cv-578-WQH-AGS, 2020 WL 1479071 (S.D. Cal., Mar. 26, 2020) (unpublished), at 8.

²⁵³ Proposed Order at 13 ¶ 53.

“environmental justice requires that bottled water not be the permanent solution” and that “[l]ong-term replacement water likely consists of replacing the source water, thereby allowing community members total and unrestricted use of all household taps for consumptive use.”²⁵⁴

There is no legal or factual basis for the Regional Board’s apparent prohibition against the use of bottled water as replacement water. The Regional Board mentions “environmental justice” requirements but cites no legal authority for its position. Nor does the Regional Board explain why any environmental justice requirements override the Water Code’s provisions, which the Regional Board admits are satisfied by the provision of bottled water. More fundamentally, the Regional Board has not explained what environmental justice considerations are implicated by choice of water supply solutions in South Lake Tahoe.

Finally, Section 13360, discussed above, precludes the Regional Board from dictating the means by which any requirement for uninterrupted replacement water service must be met.²⁵⁵ By barring the use of bottled water as replacement water, the Regional Board is “specify[ing] . . . the particular manner in which compliance may be had” and preventing parties from “comply[ing] with the order in any lawful manner.” This is exactly what Section 13360 does not allow the Regional Board to do, and the Proposed Order must be revised accordingly.

G. The Regional Board Cannot Discard Its Prior Conclusions Without Showing It Has Developed Significant New Information

The California Supreme Court requires that the Regional Board “render findings sufficient both to enable the parties to determine whether and on what basis they should seek review and, in the event of review, to apprise a reviewing court of the basis for the board’s action.”²⁵⁶ The “agency [that] renders the challenged decision must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order.”²⁵⁷ Of particular importance here, an agency is required to provide a reasoned explanation for its change in position.²⁵⁸

The Regional Board has not met these requirements here. The technical conclusions set forth in the Proposed Order and the accompanying Staff Report do not align with the Regional Board’s prior determinations on a number of important issues. As detailed in the Technical Comments, the

²⁵⁴ *Id.*

²⁵⁵ Cal. Water Code § 13360; see Section VIII-D, *supra*.

²⁵⁶ *Topanga Ass’n for a Scenic Community v. Cty. of Los Angeles*, 11 Cal. 3d 506, 514 (Cal. 1974).

²⁵⁷ *Id.* at 515.

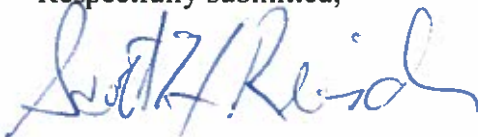
²⁵⁸ See *Encino Motorcars, LLC v. Navarro*, 136 S. Ct. 2117, 2125-26 (2016); *Protect the Historic Amador Waterways v. Amador Water Agency*, 116 Cal. App. 4th 1099, 1111, as modified (Apr. 9, 2004) (agencies must explain reasoning in order to permit judicial review); see generally *Olive Proration Program Comm. for Olive Proration Zone No. v. Agric. Prorate Comm’n*, 17 Cal. 2d 204, 209 (1941) (“[C]ourts have held that the determination of an administrative agency as to the existence of a fact or status which is based upon a present or past group of facts, may not thereafter be altered or modified.”); *Spanish Speaking Citizens’ Found., Inc. v. Low*, 85 Cal. App. 4th 1179, 1215 (2000) (agency may adopt a new position “provided that the agency explains and rationally justifies the change” (internal quotation marks omitted)).

Proposed Order deviates from prior Regional Board pronouncements as to the cause of the contamination at the LTLW, whether the LTLW contamination has been delineated, whether appreciable LTLW contamination migrated off-site, whether leaking sanitary sewers served as a preferred pathway for contamination to migrate from the LTLW, and whether sources of PCE other than the LTLW contributed to the Regional PCE Contamination.²⁵⁹ Instead of simply ignoring its prior pronouncements, the Regional Board should align its conclusions with its prior findings. If it chooses not to do so, it must specify what compelling new data and information justify its change of heart.

IX. CONCLUSION

For the reasons set forth above, Fox requests that the Regional Board withdraw the Proposed Order, or, at a minimum, remove Fox from its purview. If the Regional Board chooses not to do either, it should substantially revise the Proposed Order as outlined in these comments and the attached exhibits.

Respectfully submitted,



Scott H. Reisch

²⁵⁹ See Technical Comments §§ 1.1 (source of LTLW contamination), 1.2 (delineation), 2.4 (migration), 2.6 (sanitary sewer pathways), 3 (off-site sources of Regional PCE Contamination).

EXHIBIT A

REFERENCES

1. 1992 Cal. Legis. Serv. Ch. 729 (S.B. 1277) (West)
2. Addendum to Shopping Center Lease between Connolly Development Inc., as Landlord, and Robert, Berniece and Norman Prupas dba Bobby Page Cleaners, as Tenant, dated May 24, 1972 (July 5, 1972)
3. AECOM, Regional Plume Characterization Summary Report: South “Y” PCE Plume, 2019 2020 Field Season
4. Agreement for Purchase and Sale of South Y Shopping Center between Century 73 and Interland (Dec. 19, 1985)
5. Am. Compl., *Seven Springs v. Fox* (May 16, 2007)
6. Assembly Bill 1517, Ch. 1149, Stat. 1951, Inter-Departmental Communication from the Office of the Attorney General to Governor Warren (June 12, 1951)
7. Assembly Bill 2700 (Mar. 3, 1980)
8. Assignment of Sublease to L.W. and Mary Lou Baisley (July 28, 1976)
9. B. Beard, Letter to H. Singer (Regional Board), L. Dernbach (Regional Board) and S. Blum (State Board), Re: LTLW (Oct. 5, 2005)
10. Baisley Dep. (Apr. 13, 2007)
11. Bakker Dep. (Sept. 18, 2002)
12. Beard Dep. (June 13, 2002)
13. California Regional Water Quality Control Board, Dry Cleaners—A Major Source of PCE in Ground Water (Mar. 27, 1992)
14. Caulk Dep. (Jan. 23, 2002)
15. Certificate of Cancellation – Limited Partnership, Century Properties Equity Fund 73 (June 29, 1990)
16. Certificate of Dissolution – Limited Partnership, Century Properties Equity Fund 73 (filed Apr. 18, 1990)
17. Declaration of Kerstin Hakansson (Aug. 23, 2022)
18. Declaration of Kerstin Hakansson (June 6, 2017)
19. DRI, *Fate and Transport Modeling of the South Y PCE Groundwater Contamination Plume* (June 28, 2019)
20. E2C, Addendum to Interim Remedial Action Workplan for SZA Groundwater Investigation, SZA Groundwater Monitoring, Interim Remedial Action Vadose Zone Soil and Shallow Groundwater Cleanup, LTLW (Aug. 26, 2009)
21. E2C, Interim Remedial Action Workplan for SZA Groundwater Investigation, SZA Groundwater Monitoring, Interim Remedial Action Vadose Zone Soil and Shallow Groundwater Cleanup, LTLW (June 4, 2009)
22. EKI, Investigation Summary Report: Former LTLW (EKI A70020.11) (Apr. 3, 2020)
23. EKI, Off-Site Groundwater Investigation Data Report: South Y Area, South Lake Tahoe, California (EKI A70020.02) (Aug. 30, 2017)
24. EKI, Response to Water Board Notification of Consideration of No Further Action (Dec. 3, 2015)
25. Fox’s Petition for Review, Request to Supplement the Record, and Request for Hearing, In re: Order R6T-2017-0022 (State Board, June 12, 2017)
26. Fox’s Third Party Complaint against Real Estate Mgmt. Associates, LLC, et al., *Seven Springs v. Fox* (Dec. 19, 2008)

27. Fox's Verified Petition for Writ of Administrative Mandamus, *Fox v. Reg'l Bd.* (Oct. 17, 2017)
28. Grant Deed from Connolly Development (Grantor) to Century 73 (Grantee) (Sept. 11, 1974)
29. Green Dep. (Apr. 10, 2002)
30. Hickman Dep. (Sept. 18, 2002)
31. *In re Logsdon*, Cal. State Water Res. Control Bd. Order No. WQ 84-6 (July 19, 1984)
32. *In re Spitzer*, Cal. State Water Res. Control Bd., Order No. WQ 89-8 (May 16, 1989)
33. *In re Stuart*, Cal. State Water Res. Control Bd., Order No. WQ 86-15 (Sept. 18, 1986)
34. Landon Dep. (Oct. 4, 2002)
35. Lease Between Landlord Connolly Development and Tenants the Prupases (May 24, 1972)
36. McLemore Dep. (May 28, 1999)
37. Memorandum from A. Bassak, Esq. to H. Singer and L. Dernback (Regional Board), South Y Center Chain of Title and Laundry Lease History (Mar. 11, 2004)
38. Memorandum of Lease between Century 73 and Connolly Development (Sept. 11, 1974)
39. Minute Order, *Fox v. Reg'l Bd.* (June 6, 2020)
40. Minute Order, *Seven Springs v. Reg'l Bd.* (Nov. 5, 2020)
41. Nance Dep. (Aug. 23, 2001)
42. Notice to Creditors, Escrow No. 203-96154 (Feb. 5, 1998)
43. Opsahl Dep. (Nov. 22, 2002)
44. Order for Corrective Action Workplan, LTLW (Apr. 18, 2006)
45. Order Vacating Judgment and Staying Case Pending Resolution Following Stipulation by the Parties, *United Artists* (May 29, 2020)
46. Order, *Seven Springs v. Fox* (Apr. 26, 2007)
47. Order, *United Artists* (Sept. 29, 2017)
48. P. Kouyoumdjian (Regional Board Executive Officer), Cover Letter to 2017 CAO (May 17, 2017)
49. PES, First Quarter 2022 Monitoring Report, Former LTLW (June 15, 2022)
50. PES, Letter to Regional Board re: Groundwater Investigation Results, LTLW (Nov. 17, 2003)
51. Proposed Judgment, *Seven Springs v. Reg'l Bd.* (Nov. 18, 2020)
52. Proposed Order
53. Ramirez Dep. (Dec. 3, 2002)
54. Regional Board, CAO No. R6T-2022-(PROPOSED) Former Big O Tires, APN 023-523-008-000
55. Regional Board, CAO No. R6T-2022-(PROPOSED) Former Norma's Cleaners, APN 023-191-961
56. Regional Board, CAO No. R6T-2017-0022 Requiring Remediation and Additional Investigation of PCE Groundwater Contamination, LTLW, Site Cleanup Program CASE T6S043 (May 12, 2017)
57. Regional Board, Investigative Orders RGT-2019-0013 to 0235 (Apr. 3, 2019)
58. Regional Board, Investigative Order No. R6T-2009-0013 to Submit Workplan for Remediation at LTLW (Apr. 8, 2009)
59. Regional Board, Lahontan Water Board Receives \$4.6 Million Grant to Investigate Perchloroethylene (PCE) Contamination in South Lake Tahoe's Groundwater, Media Release (Mar. 13, 2019)

60. Regional Board, Letter to Fox and Seven Springs re Acceptance of Interim Remedial Action Workplan and Addendum (Sept. 1, 2009)
61. Regional Board, Letter to Seven Springs and Fox re Acceptance of Work Plan for Remediation and Order to Submit Technical Reports (Aug. 2, 2013)
62. Regional Board, Memorandum Re Summary of 13267 Site History Questionnaire as of July 26, 2019 (Aug. 22, 2019)
63. Regional Board, Notice to Submit Workplan for Investigation at LTLW (APN 023-421-011) (June 5, 2003)
64. Regional Board, Proposed CAO No. R6T-2015-PROP Requiring Seven Springs and Fox, to Clean Up and Abate the Discharge and Threatened Discharge of Chlorinated Hydrocarbons to the Groundwaters of the Lake Tahoe Hydrologic Unit, at LTLW (Sept. 15, 2015)
65. Regional Board, Request for Workplan for Supplemental Site Investigation at LTLW (Apr. 12, 2004)
66. Regional Board, Revised CAO No. R6T-2016-PROP (July 18, 2016)
67. Regional Board, Revised Request for Workplan for Supplemental Site Investigation at LTLW (May 17, 2004)
68. Regional Board, Status Report on the “Y” Investigation in South Lake Tahoe (Sept. 4-5, 1997)
69. Regional Board’s Opposition to Opening Briefs in Support of Verified Petitions for Writ of Administrative Mandamus, *Fox v. Reg’l Bd.* (Sept. 6, 2019)
70. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016)
71. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016) – Exhibits Part 1 (A-P)
72. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016) – Exhibits Part 2 (Q-GG)
73. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016) – Exhibits Part 3 (HH-JJ)
74. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016) – Exhibits Part 4 (KK-NN)
75. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016) – Exhibits Part 5 (OO-XX)
76. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016) – Exhibits Part 6 (YY-BBB)
77. S. Reisch, Fox’s Response to Proposed CAO for Former LTLW (Feb. 11, 2016) – Exhibits Part 7 (CCC-JJJ)
78. S. Reisch, Fox’s Response to Revised CAO for Former LTLW (Sept. 8, 2016)
79. S. Reisch, Fox’s Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 1 (A-R)
80. S. Reisch, Fox’s Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 2 (S-V)
81. S. Reisch, Fox’s Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 3 (W-Z)
82. S. Reisch, Fox’s Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 4 (AA-VV)
83. S. Reisch, Fox’s Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 5 (WW-ZZ)

84. S. Reisch, Fox's Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 6 (AAA-MMM)
85. S. Reisch, Fox's Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 7 (NNN-OOO)
86. S. Reisch, Fox's Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 8 (PPP-ZZZ)
87. S. Reisch, Fox's Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 9 (AAAA-HHHH)
88. S. Reisch, Fox's Response to Revised CAO for Former LTLW (Sept. 8, 2016) – Exhibits Part 10 (IIII-YYYY)
89. San Francisco Regional Board Order No. R2-2013-0032, Adoption of Site Cleanup Requirements for Moonlight Associates, LLC, and United Artists Theatre Circuit, Inc. (Sept. 11, 2013)
90. San Francisco Regional Board, Combined Reply Brief and Cross-Appeal Opposition Brief, *United Artists* (Oct. 24, 2018)
91. San Francisco Regional Board, Order No. R-2020-0022, Amendment of Site Cleanup Requirements (June 17, 2020)
92. San Francisco Regional Board's Opposition on the Merits, *United Artists* (Apr. 19, 2017)
93. Senate Committee on Health and Welfare, Staff Analysis of Assembly Bill 2700 (McCarthy), As Amended May 19, 1980
94. Seven Springs' Petition for Review and Request for Abeyance, In re: Order R6T-2017-0022 (State Board, June 12, 2017)
95. Seven Springs' Opposition to Fox's Motion Dismiss, *Seven Springs v. Fox* (Apr. 9, 2007)
96. Seven Springs' Verified Petition for Writ of Administrative Mandamus, *Seven Springs v. Reg'l Bd.* (Apr. 20, 2018)
97. State Coalition for Remediation of Drycleaners, A Chronology of Historical Developments in Drycleaning (Nov. 2007)
98. Stipulated Agreement for Replacement Water Supply at 883 and 903 Eloise Avenue (May 20, 2015)
99. Sublease of Kyell and Kersten Hakansson (Nov. 20, 1973)
100. Suggett Dep. (Sept. 27, 2002)
101. Supplemental Brief in Support of Fox's Verified Petition for Writ of Administrative Mandamus, *Fox v. Reg'l Bd.* (Apr. 16, 2020)
102. Thomas K.G. Mohr, Santa Clara Valley Water District, Study of Potential for Groundwater Contamination from Past Dry Cleaner Operations in Santa Clara County (Sept. 20, 2007)
103. UATC's Memorandum of Points and Authorities in Support of UATC's Motion for Administrative Writ of Mandamus, *United Artists* (Jan. 26, 2017)
104. URS, Final PCE Investigation Report, South Lake Tahoe (Jan. 19, 2016)
105. W. Atwater (State Board Chief Counsel), Letter to R. Monogan (Calif. Manufacturers Association) (June 11, 1980)
106. Wooten Dep. (Sept. 12, 2001)

EXHIBIT B

19 September 2022

Katrina Fleshman
Executive Assistant
Lahontan Regional Water Quality Control Board
2501 Lake Tahoe Boulevard
South Lake Tahoe, California 96150

**Subject: Comments on Proposed Lake Tahoe Laundry Works Cleanup and Abatement Order
1024 Lake Tahoe Boulevard, South Lake Tahoe, California**

Dear Ms. Fleshman:

On behalf of Seven Springs Limited Partnership (Seven Springs) and Fox Capital Management Corporation (Fox), PES Environmental, Inc., an NV5 Company, (PES) and EKI Environment & Water, Inc. (EKI) submit these technical comments on the proposed Cleanup and Abatement Order (Proposed Order) prepared by the Lahontan Regional Water Quality Control Board (Regional Board) for the former Lake Tahoe Laundry Works (LTLW) tenant space at 1024 Lake Tahoe Boulevard in South Lake Tahoe, California (Site). Our comments are based in part on the information set forth on the GeoTracker pages for the Lake Tahoe Laundry Works site (Global ID No. [SL0601754315](#)), the Former Big O Tires site (Global ID No. [SL0601729739](#)), the Former Norma's Cleaners site (Global ID No. [SL0601790916](#)), the South Y Regional Contamination (Global ID No. [T10000007984](#)), and the historical South Y PCE contamination (Global ID No. [SL0601794942](#)). An index of the documents listed for these sites is included in Exhibit 163 (see attached List of Exhibits). Additionally, documents referenced in this letter are available for download at <https://pesenvironmental.filegenius.com/downloadPublic/v1a2q4t7lahznfc/qbgymc76s72jxno>.

Our comments address inaccurate and misleading statements in the Proposed Order and refute the Regional Board's scientifically flawed effort to ascribe groundwater contaminated by perchloroethylene (PCE) throughout the Tahoe Valley South Subbasin to the LTLW. This contamination is due to PCE releases at numerous sites and does not derive to any appreciable measure from PCE discharged at the LTLW. The Proposed Order is not needed to complete cleanup of the LTLW and should not be adopted because the LTLW has been fully characterized, effective remedial actions are in place, and the scope of work in the Proposed Order pertains to investigation and remediation of regional PCE contamination for which LTLW is not the cause.

1 THE PROPOSED ORDER "OVERVIEW" AND "REGULATORY AND LITIGATION HISTORY" SECTIONS ARE INACCURATE

The Regional Board incorrectly describes the PCE discharge at the LTLW and inexplicably disparages the work Seven Springs and Fox have accomplished, under the Regional Board's supervision, to investigate and remediate the effects of that discharge.

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1.1 The Proposed Order Incorrectly Describes the PCE Discharge at the LTLW

The Regional Board states that “[s]pills/discharges associated with PCE delivery, handling, and disposal practices are the likely sources of waste discharge at the Site.”¹ Seven Springs and Fox disagree with the Regional Board’s characterization of the likely sources of PCE at the Site. The results of environmental investigations at the Site indicate that PCE released during delivery is the only source of contamination at the LTLW. Four investigative events were conducted between 2003 and 2006, which involved completing 35 boreholes and collecting 77 soil and 22 groundwater samples from them to assess conditions beneath the LTLW tenant space, parking lot in front of the building, and along the sanitary sewer and storm drain pipelines.² Investigative findings suggest the only significant source of discharge at the Site was associated with a release during PCE delivery that appears to have occurred in the parking lot in front of the building.³ In the nearly twenty years of investigations of the LTLW, all of which were conducted under the direction of the Regional Board, no evidence of spills or discharges, other than in the parking lot, have been identified.⁴

1.2 The Proposed Order Misrepresents Seven Springs and Fox’s Diligence in Remediating the LTLW

The Proposed Order presents an inaccurate and incomplete depiction of the regulatory history of the Site that somehow omits the fact that Seven Springs and Fox have undertaken a lengthy, thorough, and objectively successful effort to remediate the Site. In Paragraphs 10 through 18, the Proposed Order summarizes the basic history of the Site without mentioning the considerable work by Seven Springs to address the presence of chlorinated volatile organic compounds (VOCs) and respond to the Regional Board’s concerns since 2003, when the Regional Board initially contacted Seven Springs, or the actions that Seven Springs and Fox jointly took after 2008.

¹ Proposed Order, at 2 ¶ 5.

² PES. 17 November 2003. Groundwater Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; PES. 13 October 2004. Supplemental Site Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; PES 27 May 2005. Additional Site Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; PES. 31 January 2006. Additional Soil Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, RWQCB SLIC CASE No. T6S043.

³ Regional Board. 12 May 2017. Cleanup and Abatement Order (CAO) R6T 2017 0022 Requiring Remediation and Additional Investigation of PCE Groundwater Contamination, Lake Tahoe Laundry Works, South Lake Tahoe, California, Site Cleanup Program Case T6S043. (“2017 CAO”), at 3 (attributing contamination at the LTLW to spills during solvent delivery).

⁴ These findings were confirmed by investigations completed under the 2017 CAO.

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Seven Springs and Fox have cooperated fully and have been engaged in a Site Cleanup Program with the Regional Board for more than a decade. As a result, the Regional Board should amend the Proposed Order to present a more complete discussion of the “Regulatory and Litigation History” portion of the Proposed Order.

Delineation. The Regional Board cites the issuance of Water Code § 13267 investigative directives in 2003, 2004, and 2005 and indicates that four investigations were performed at the Site between 2003 and 2006.⁵ The Proposed Order goes on to state that “[a]lthough required in these WC section 13267 investigative orders, the lateral and vertical extent of PCE and other wastes was never determined.”⁶ This statement does not align with findings made by the Regional Board in earlier correspondence to Seven Springs and Fox. In an 18 April 2006 directive, provided in response to the results of an additional soil investigation, the Regional Board stated “[s]ampling was essentially successful in defining the vertical and lateral extent of solvent contamination in soil.”⁷ Additionally, on 8 April 2009, the Regional Board issued Investigative Order No. R6T-2009-0013 requiring submittal of a remediation workplan. The order specifically stated “[t]he lateral and vertical extent of tetrachloroethene (PCE) is defined in the vadose zone based on soil sample results and geologic cross sections.”⁸ On 1 September 2009, the Regional Board accepted an Interim Remedial Action Workplan that concluded on-Site contamination had been delineated and was not migrating off the LTLW.⁹

Scope of Cleanup. The Proposed Order¹⁰ mentions the 8 April 2009 directive, Remedial Action Workplan, and the Draft Remedial Action Plan,¹¹ dated 12 August 2010, that Seven Springs and Fox submitted to the Regional Board, but the Proposed Order fails to acknowledge the Regional Board’s role in determining the

⁵ Proposed Order, at 3-4 ¶ 10.

⁶ *Id.*

⁷ Regional Board. 18 April 2006. Order for Corrective Action Workplan, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, at 1.

⁸ Regional Board. 8 April 2009. *Investigative Order No. RGT-2009-0013 to Submit Workplan for Remediation at the Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County*, at 1.

⁹ See letter from Regional Board to S. Reisch (counsel for Fox) and B. Beard (counsel for Seven Springs) 1 September 2009. *Acceptance of Interim Remedial Action Workplan and Addendum, Lake Tahoe Laundry Works*, at 1; Environmental Engineering, Consulting and Remediation, Inc. (E₂C). 4 June 2009. *Interim Remedial Action Workplan for SZA Groundwater Investigation, SZA Groundwater Monitoring, Interim Remedial Action Vadose Zone Soil and Shallow Groundwater Cleanup, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe*, at 1-4.

¹⁰ Proposed Order, at 4 ¶¶ 12-13.

¹¹ E₂C. 12 August 2010. *Interim Remedial System Installation/Pilot Testing Report of Findings and Draft Remedial Action Plan for Vadose Zone Soil and Shallow Groundwater Cleanup, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California*.

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scope of those documents. In particular, the Regional Board in its Staff Report¹² supporting the Proposed Order describes the area that it agreed should be remediated in 2008 as a “source area zone” that Seven Springs/Fox “predefined.”¹³

Cleanup was not limited to the source area on the LTLW. During a meeting on 24 September 2008, Seven Springs/Fox and the Regional Board reached consensus that remediation should address all soil and shallow groundwater impacted by the discharge at the Site. The soil vapor extraction and groundwater air sparge system (SVE/GASS) implemented by Seven Springs/Fox addressed (1) vadose zone soil in the vicinity of the former laundromat tenant space and adjacent parking lot, and (2) shallow zone groundwater to 25 below ground surface (bgs) encompassing an area approximately 375 feet long by 145 feet wide.¹⁴ In 2013, the Regional Board issued an order approving use of the SVE/GASS to “remediate contaminants in soil, soil gas, and groundwater.”¹⁵ The order stated that the case for the LTLW could be closed after verification monitoring for one year demonstrated chlorinated VOCs in groundwater remain at concentrations less than their respective maximum contaminant levels (MCLs) to “ensure restoration of beneficial uses to the drinking water aquifer” had been achieved.¹⁶

Replacement Water. Seven Springs and Fox entered into a Stipulated Agreement for Replacement Water Supply¹⁷ with the owners of properties at 883 and 903 Eloise Avenue at the request of the Regional Board. The Proposed Order cites the date of the agreement as 5 June 2015;¹⁸ the actual date of the agreement is 15 June 2015. Water samples collected from noncommunity water system wells at these properties in 2014 and 2015 contained PCE.¹⁹ Seven Springs and Fox disagreed with the Regional Board about the source of PCE detected in samples from the wells, but nevertheless agreed to provide a replacement water supply (i.e., reimbursement for bottled water and for alternate permanent water supply). The Proposed Order does not mention that the agreement contains the following language: “[b]y agreeing to provide a

¹² Regional Board. 16 June 2022. *Staff Report Supporting Cleanup and Abatement Order No. R6T-2022-(Proposed)*. (“Regional Board Staff Report” or “Staff Report”).

¹³ *Id.*, at 59.

¹⁴ E₂C (2010). *supra* n. 11, at 21.

¹⁵ Proposed Order, at 4 ¶¶ 14; Regional Board. 2 August 2013. Acceptance of Workplan for Remediation and Order to Submit Technical Reports, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Investigative Order R6T-2013-0064, at 2.

¹⁶ Regional Board (2013). *supra* n. 15, at 2; *see also* 2017 CAO, at 1 ¶ 2. (“Investigation and corrective actions prior of the date of this Order have been implemented by Seven Springs Limited Partnership (Seven Springs) and Fox Capital Management Corporation (Fox) in compliance previous Water Board Directives.”).

¹⁷ Regional Board. 15 June 2015. *Notification of Stipulated Agreement for Replacement Water Supply at 883 and 903 Eloise Avenue, South Lake Tahoe*.

¹⁸ Proposed Order, at 4 ¶ 15.

¹⁹ Regional Board (2015). *supra* n. 17, at 1.

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replacement water supply, all Parties agree that neither Fox Capital nor Seven Springs admit to any liability under or any violation of the California Water Code or any other federal, state, or local law or ordinance.”²⁰

The Proposed Order at Paragraph 17 states that a Satisfaction of Stipulated Agreement for Replacement Drinking Water²¹ was provided to Seven Springs and Fox on 17 February 2016. Left unsaid is that Seven Springs and Fox reimbursed the property owners at 883 and 903 Eloise Avenue a sum of \$45,800 for expenses of obtaining bottled water as an interim water supply and connecting the two properties to a Lukins Brothers Water Company (LBWC) potable water line on Eloise Avenue that serves as an alternate permanent water supply.

Compliance with 2017 CAO. Paragraphs 24 through 28 of the Proposed Order present an inaccurate and misleading depiction of Seven Springs/Fox’s work in complying with the 2017 CAO. Extensive on-Site and off-Site sampling was conducted as part of the Preferential Pathway Evaluation, Off-Site Groundwater Investigation, and Data Gap Investigation implemented pursuant to the 2017 CAO and work plans approved by the Regional Board.

With respect to the Preferential Pathway Evaluation, Seven Springs and Fox submitted the work plan for the evaluation²² to the Regional Board on 28 September 2018, which the Regional Board approved²³ on 5 October 2018. The Preferential Pathway Evaluation was to be accomplished in two stages. Between October and December 2018, Seven Springs and Fox conducted Stage 1 of the Preferential Pathway Evaluation, which entailed (1) reviewing public records and interviewing staff at the City of South Lake Tahoe Building Division and South Tahoe Public Utility District (STPUD) regarding storm drain and sanitary sewer systems in the vicinity of the Site, (2) performing a closed-circuit television (CCTV) inspection of the storm drain and sanitary sewer pipelines to establish their conditions and identify any defects (e.g., displaced joints, separated joints, breaks and cracks) where chlorinated VOCs may have entered or exited the pipes, (3) analyzing passive soil gas samples from thirteen locations along the alignments of the storm drain and sanitary sewer systems and inside four manholes of these systems on the LTLW, and (4) testing samples of fill surrounding the storm drain and sanitary sewer pipelines at locations where higher PCE masses were measured in passive soil gas samples. As discussed in Section 2.6, the results of the Stage 1 Preferential Pathway Evaluation do not indicate PCE migrated off-Site along utility lines or other subsurface features that could act as preferential pathways for PCE transport.

²⁰ *Id.* 17, at 1.

²¹ Regional Board. 17 February 2016. *Satisfaction of Stipulated Agreement for Replacement Drinking Water — Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County.*

²² PES. 28 September 2018. Preferential Pathway Evaluation Work Plan, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California.

²³ B. Grey (Regional Board). 16 October 2018. Email to Working Parties and Regional Board staff. *Re Comments on Weekly Progress Reports, Preferential Pathway Evaluation Work Plan and Revised Preliminary Planning Report.*

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Seven Springs and Fox began work on the Stage 2 Preferential Pathway Evaluation after completing Stage 1 of the evaluation. On 18 April 2019, pursuant to a reimbursement agreement with Seven Springs/Fox, STPUD performed a CCTV inspection of the sanitary sewer pipeline on Lake Tahoe Boulevard, Glorene Avenue, and Tucker Avenue (i.e., manholes TK-578, TK-577, TK-576, TK-575, and TK-536). Seven Springs and Fox attempted a Stage 2 CCTV inspection of the storm drain pipeline that traverses the former Big O Tires facility, but the property owners did not provide access.

In parallel, Seven Springs and Fox initiated the Off-Site Groundwater Investigation in accordance with the Amended Groundwater Investigation Work Plan,²⁴ dated 18 March 2018. Seven Springs/Fox implemented three phases of the Off-Site Groundwater Investigation, which included the performance of cone penetrometer tests, membrane interface probe assessments, construction of three shallow zone/middle zone groundwater monitoring well pairs, and collection and analysis of 110 multi-depth grab groundwater samples from one on-Site and 20 off-Site borehole locations.

The need to evaluate off-Site sources of PCE to groundwater between Lake Tahoe Boulevard and Tucker Avenue became evident when multi-depth grab groundwater samples obtained during the Off-Site Groundwater Investigation showed PCE concentrations in groundwater within the shallow zone, defined to be from ground surface to approximately 30 feet bgs, and middle zone, defined to be approximately 30 feet bgs to 60 feet bgs, along Tucker Avenue to be up to 100 times greater than PCE concentrations in samples collected along Lake Tahoe Boulevard.²⁵ Accordingly, the Data Gap Investigation resulted in collection and analysis of 45 passive soil gas samples at the Napa Auto Parts/Former Lakeside Automotive site, along Glorene Avenue, and within the Tucker Avenue stormwater detention basin (Tucker Basin).²⁶ Seven Springs/Fox proposed passive soil gas sampling at the former Big O Tires facility but were not granted permission to access the property.²⁷

Communication with Regional Board. The Proposed Order does not reflect the degree to which Seven Springs and Fox communicated with Regional Board staff on a regular basis. At the Regional Board's request, Seven Springs and Fox prepared and submitted Planning and Progress Reports (PPRs) and participated in meetings with Regional Board staff to discuss work by Seven Springs and Fox, and actions conducted by others regarding the regional groundwater PCE contamination. Seven Springs and Fox submitted 13 weekly PPRs from 9 October 2018 through 29 January 2019 (PPR Nos. 2 through 14), bi-weekly PPRs from 12 February 2019 through 19 November 2020 (PPR Nos. 15 through 31), and monthly

²⁴ EKI. 19 March 2018. Amended Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California.

²⁵ EKI. 4 October 2019. Investigation Summary Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at 4.

²⁶ EKI. 1 April 2019. Investigation Summary Report, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at 17.

²⁷ EKI (2019). *supra* n. 25, at 16-17.

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PPRs from 17 December 2020 through 3 May 2022 (PPR Nos. 32 through 63). Generally, one telephonic meeting between consultants for Seven Springs/Fox and Regional Board staff was conducted during the period covered by each PPR.

During these meetings and as reflected in the associated PPRs, Seven Springs and Fox presented investigative results and explained difficulties with executing planned work at the former Big O Tires facility. Seven Springs and Fox made the need for access to the Big O Tires site clear during regular telephonic meetings with the Regional Board and in PPRs submitted prior to the meetings. In November 2018, Seven Springs and Fox submitted a letter to owners of the former Big O Tires facility requesting access to perform the work.²⁸ Property representatives did not respond to this request or to a follow-up request made by Seven Springs/Fox²⁹ in December 2018. In January 2019, Seven Springs and Fox sought Regional Board assistance in gaining access to the former Big O Tires facility.³⁰ In spite of these requests, no assistance from the Regional Board was forthcoming. As a result, Seven Springs and Fox were prevented from conducting work essential to understanding if investigation of Tucker Basin by Seven Springs/Fox was appropriate based on a determination that the discharge at LTLW had impacted the basin. The Regional Board indicated it would assist with access to the Big O Tires site; Seven Springs and Fox are not aware of any assistance that might have been provided.³¹

Off-Site Source Investigations. Actions by Seven Springs and Fox that established the lateral and vertical extents of chlorinated VOCs associated with the LTLW are not accurately described in the Proposed Order. The Proposed Order incorrectly states that “[d]espite these regular communications, the Dischargers elected to focus on finding additional potential dischargers.”³² This inaccurate statement should be removed as it ignores Seven Springs/Fox (1) undertook extensive on-Site and off-Site work at the Regional Board’s request, and (2) attempted to conduct additional off-Site work, but were precluded from doing so because they were denied access and the Regional Board did not respond to requests from Seven Springs/Fox to obtain access.

²⁸ PES. 15 November 2018. *Request for Site Access, 1961 Lake Tahoe Boulevard APN 023-523-08-100, South Lake Tahoe, California.*

²⁹ PES. 13 December 2018. *Follow-Up on Request for Site Access, 1961 Lake Tahoe Boulevard APN 023-523-08-100, South Lake Tahoe, California.*

³⁰ PES. 14 January 2019. *Request for Assistance with Access, Former Big O Tires Store, 1961 Lake Tahoe Boulevard APN 023-523-08-100, South Lake Tahoe, California, at 1.*

³¹ PES and EKI. 15 January 2019. *Groundwater Investigation Planning and Progress Report No. 13, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California.*

³² Proposed Order, at 6 ¶ 26.

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The Proposed Order erroneously states that the Regional Board pursued a grant from the State Water Resources Control Board's (State Water Board's) Site Cleanup Subaccount Program (SCAP) due in part to delay by Seven Springs/Fox.³³ Under the 2017 CAO, Seven Springs and Fox conducted the Preferential Pathway Evaluation and Data Gap Investigation to the extent possible and implemented three phases of the Off-Site Groundwater Investigation. Prior to issuance of the 2017 CAO, Seven Springs and Fox conducted a voluntary off-Site investigation. Rather than pursue the SCAP grant because of any failure by Seven Springs/Fox, the Regional Board's own press release states that it sought the grant because "[s]everal businesses in the South Y area are known or suspected to have used, stored, or disposed of PCE or PCE-containing products" and the Regional Board pledged to use a \$4.6 million SCAP grant to "track down all potential sources of pollution" to regional groundwater PCE contamination.³⁴ As discussed in Section 2.1, the Regional Board has endeavored to identify PCE sources since the Tahoe South Y PCE Investigation commenced after discovering contamination in public water system wells in 1989.

Verification Monitoring. The Proposed Order observes verification monitoring has not been conducted at the LTLW.³⁵ Under the 2017 CAO, the SVE/GASS is to be operated "in accordance with previously accepted work plans and proposals."³⁶ Investigative Order R6T-2013-0064 requires verification monitoring after remediation of the LTLW is completed.³⁷ As remediation is ongoing, verification monitoring would be premature "to ensure restoration of beneficial uses,"³⁸ which is the intent of such monitoring.

2 THE REGIONAL PCE CONTAMINATION IS NOT ATTRIBUTABLE TO A PCE DISCHARGE AT THE LTLW

The Regional Board contends that a discharge at the LTLW is responsible for the so-called "South Y PCE Plume," an area of groundwater containing PCE within the Tahoe Valley South Subbasin that the Regional Board asserts is approximately 1.5 miles long and 1 mile wide.³⁹ The Regional Board claims that the LTLW is at the "head of a contiguous plume,"⁴⁰ that extends, without interruption, to the Tahoe Keys to the north

³³ *Id.*, at 6 ¶ 28.

³⁴ Regional Board. 13 March 2019. Lahontan Water Board Receives \$4.6 Million Grant to Investigate Perchloroethylene (PCE) Contamination in South Lake Tahoe's Groundwater. Media Release. https://www.waterboards.ca.gov/press_room/press_releases/2019/pr20190313_reg6_grant_invest_pce_in_slr.pdf.

³⁵ Proposed Order, at 4 ¶ 14.

³⁶ 2017 CAO, at 14 ¶ 1.1.

³⁷ Regional Board (2013). *supra* n. 15, at 2.

³⁸ Proposed Order, at 4 ¶ 14.

³⁹ AECOM Technical Services, Inc. (AECOM). June 2022. Regional Plume Characterization Summary Report: South "Y" PCE Plume, 2019-2020 Field Season, at 24.

⁴⁰ The word "contiguous" means "touching" or "bordering upon," which would suggest that the Regional Board recognizes the so-called South Y PCE Plume consists of multiple plumes, some of which may have commingled at certain locations within the Tahoe South Subbasin. As the Regional Board attempts to describe a single

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and to depths of up to approximately 240 feet below ground surface (bgs).”⁴¹ The Regional Board’s depiction of the contamination is shown on Figure 8 of the Proposed Order (“Regional PCE Contamination”). The Proposed Order and Staff Report’s claims are at odds with the Regional Board’s previous recognition that PCE contamination in the Tahoe Valley South Subbasin is caused by multiple sources and its past acknowledgement that only localized impacts resulted from a PCE discharge on the LTLW.⁴² As explained in many submittals to the Regional Board, data obtained from extensive investigations completed by Seven Springs and Fox demonstrate the Regional PCE Contamination (1) is not a uninterrupted plume that originates from the LTLW, (2) is not attributable to a single source but is due to PCE releases at numerous sites, and (3) does not derive to any appreciable measure from PCE discharged at LTLW either before or after commencement of on-Site remediation.

2.1 The Regional Board Does Not Consider Upgradient Sources of the Regional PCE Contamination

The Proposed Order states that PCE was first reported in public water system wells in 1989 within the South Y Area of South Lake Tahoe and states various parties have undertaken efforts to investigate and remediate PCE discovered in the wells.⁴³ The Proposed Order omits important details of these investigative and remedial efforts, and in the process fails to include information about known sources upgradient of the Regional PCE Contamination.

In 1991 or 1992, STPUD installed an air stripper at the Clement Street public water system well to remove PCE in groundwater extracted from the well.⁴⁴ Extracted groundwater from the Julie Lane, Tata Lane #4, and South Y Center public water system wells was conveyed to the Clement Street wellhead treatment system.⁴⁵ STPUD stopped operating these wells in 1998 or 1999.⁴⁶ The Julie Lane, Tata Lane #4, and

“uninterrupted” plume in the Proposed Order and Staff Report and does not say what the “contiguous” plume touches or borders upon, we request that the Regional Board clarify its intent in any subsequent order.

⁴¹ Regional Board Staff Report, at 22. Similar claims are made at Proposed Order, at 3 ¶¶ 6 and 8, 8 ¶ 32.j; Regional Board Staff Report at 26, 54, 57, 68-69.

⁴² Regional Board (2009). *supra* n. 8, at 1 (noting investigations conducted by Seven Springs and Fox found that “[t]he lateral and vertical extent of [PCE] is defined in the vadose zone based on soil sample results and geologic cross sections. The investigation results indicate that solvent DNAPL (dense non-aqueous phased liquid) has not migrated from the site to other properties”).

⁴³ Proposed Order, at 7 ¶ 30.

⁴⁴ STPUD. 2021. *Who We Are*. <https://stpud.us/about/>. Accessed 29 August 2022.

⁴⁵ Regional Board. 22 August 2005. *Staff Report, Solvent Contamination at the Big O Tires Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe*, at 10; STPUD. 23 November 2016. *Feasibility Study of Remedial Alternatives to Mitigate PCE Contamination. Proposition 1 Groundwater Grant Program Planning Final Application*, at 4 of Attachment 1.

⁴⁶ STPUD (2016). *supra* n. 45, at 4 of Attachment 1; STPUD (2021). *supra* n. 44.

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South Y Center wells were destroyed in 2006.⁴⁷ The Clement Street well is inactive and remains a groundwater level observation well.

The Regional Board initiated the Tahoe South Y PCE Investigation upon discovery of contamination in public water system wells.⁴⁸ As part of this investigation, the Regional Board performed two soil gas surveys, researched current and historical businesses that may have used PCE in the South Y Area, visited the businesses and interviewed their owners and operators, and provided funding to STPUD to identify the cause of PCE detected in public water system wells.⁴⁹ The Regional Board discontinued the Tahoe South Y PCE Investigation in 2015.

The Clement Avenue, Julie Lane, Tata Lane #4, and South Y Center wells were in the upgradient direction of groundwater flow from the LTLW, as was Industrial Avenue #2 well that also contained PCE. In 1997 and 1998, STPUD collected grab groundwater samples from the shallow zone and grab water samples from the City of South Lake Tahoe sanitary sewer system.⁵⁰ The Regional Board suspected vehicle repair facilities on Shop Street and D Street to be the source of groundwater contamination in the vicinity of Julie Lane and determined PCE in Industrial Avenue #2 well was due to a release on the Tahoe Asphalt property located at 1104 Industrial Avenue.⁵¹

The Regional Board did not require delineation of impacts to groundwater off the property when it closed the Tahoe Asphalt case in 2004. Contamination discovered at other sites along Shop Street and Industrial Avenue also has not been fully characterized. For example, the Regional Board reported that 26 micrograms per liter ($\mu\text{g/L}$) of PCE was detected in a monitoring well in September 1997 at the Campora Gas property at 1640 Shop Street.⁵² Neither the source nor the lateral and vertical extents of this contamination has been established to the laboratory analytical method reporting limit of 0.5 $\mu\text{g/L}$, which is the requirement imposed by the Proposed Order.⁵³ The actual maximum concentration of PCE in groundwater beneath the Campora Gas property is not known.

⁴⁷ Proposed Order, at Figure 13; Kennedy/Jenks Consultants. 22 December 2014. *Tahoe Valley South Basin (6-5.01) 2014 Groundwater Management Plan*, at 6-6.

⁴⁸ https://geotracker.waterboards.ca.gov/profile_report?global_id=SL0601794942.

⁴⁹ Regional Board. 20 August 1997. Agency Agreement to Support the Tahoe South “Y” PCE Investigation, at 1; Regional Board. September 1997. Status Report on the “Y” Investigation in South Lake Tahoe, at 1.

⁵⁰ Regional Board. 25 February 1999. *Summary of PCE Investigations, South Lake Tahoe. FY 1997/98*, at 1.

⁵¹ *Id.*, at 3.

⁵² Regional Board. 15 July 1998. Campora Gas Property, 1640 Shop Street, South Lake Tahoe.

⁵³ Proposed Order, at 21-22 ¶ 2.a.

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In 1998, STPUD discovered that the STAGE Bus facility at 1663, 1669, and 1679 Shop Street was discharging “a great deal of petroleum products” to the sanitary sewer.⁵⁴ Based on sewer samples, these petroleum wastes were found to contain PCE and toluene, as well as lower concentrations of ethylbenzene, xylenes, and methylene chloride.⁵⁵ In 1999, the City of South Lake Tahoe, which owned STAGE Bus, a public bus service that provided transportation in and around South Lake Tahoe, collected grab groundwater samples at six locations on the STAGE Bus facility. No PCE was detected in the grab groundwater samples, but the sampling was limited to depths of approximately 10 feet bgs to 17.5 feet bgs,⁵⁶ in contrast to the multi-depth grab groundwater samples that have been obtained from distinct permeable units as deep as 150 feet bgs by Seven Springs/Fox and AECOM in their investigations of the LTLW and South Y Area, respectively. Although the Regional Board considered the STAGE Bus site to be a potential source of groundwater contamination because PCE and other VOCs were detected in the sewer, it did not require investigation of deeper groundwater and closed the STAGE Bus case based on the limited sampling that was performed.⁵⁷

The Regional Board concludes that the analytical results of grab groundwater samples collected from two boreholes (i.e., KM1 and KM2) near Kmart at the South Y Center and three boreholes along Tata Lane (i.e., LTLW-GW-16, LTLW-GW-17, and LTLW-GW-18) demonstrate “[n]o sources of PCE were identified upgradient from the Site.”⁵⁸ Seven Springs and Fox conducted sampling near Kmart to assess if identified off-Site sources in the Shop Street/Industrial Avenue area were adding PCE to groundwater beneath the LTLW.⁵⁹ Sampling along Tata Lane was performed at the direction of the Regional Board⁶⁰ and was constrained to public right of ways. No sampling was conducted at properties within the Shop Street/Industrial Avenue area that are known or suspected PCE sources to groundwater. Of the grab groundwater samples collected near Kmart and along Tata Lane,⁶¹ PCE was detected in only one sample

⁵⁴ STPUD. 20 August 1998. Letter to Regional Board regarding plugged sanitary sewer pipeline.

⁵⁵ Regional Board. 17 July 1998. STAGE Bus Property, 1680 Shop Street, South Lake Tahoe (El Dorado County) APN 032-312-02; Phase Three Environmental Management. 8 February 1999. Groundwater Investigation, STAGE Bus Facility — Shop Street, South Lake Tahoe, California.

⁵⁶ *Id.*, at 3-5.

⁵⁷ Regional Board. 4 March 1999. No Further Action at the STAGE Bus Properties, Shop Street, South Lake Tahoe, El Dorado County.

⁵⁸ Proposed Order, at 9 ¶ 33. See similar assertions at Regional Board Staff Report, at 21, 43, and 58.

⁵⁹ EKI. 30 August 2017. Off-Site Groundwater Investigation Data Report, South Y Area, South Lake Tahoe, California, at 4.

⁶⁰ PES and EKI. 13 November 2018. Groundwater Investigation Planning and Progress Report No. 7, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at attached Meeting Notes.

⁶¹ EKI (2019). *supra* n. 25, at Table 5-1.

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at 0.64 µg/L obtained from the middle zone at LTLW-GW-18. This concentration is above the PCE delineation requirement of 0.5 µg/L established by the Proposed Order.

Even if chlorinated solvent releases at upgradient properties are not affecting conditions at the LTLW, PCE from upgradient off-Site sources may be contributing PCE at concentrations greater than 0.5 µg/L to the Regional PCE Contamination. In 2016, STPUD retained the Desert Research Institute (DRI) to examine the fate and transport of PCE in groundwater within the Tahoe Valley South Subbasin as part of a feasibility study evaluating remedial alternatives for the contamination. The State Water Board funded preparation of the feasibility study.⁶² Particle tracking by DRI's resulting numerical groundwater flow model indicates groundwater from the Shop Street/Industrial Avenue area bypasses the LTLW as it moves into the Regional PCE Contamination.⁶³ Consequently, the magnitude of the impact on groundwater quality from sources upgradient of the LTLW is unknown because the Regional Board has not required or performed an adequate investigation of groundwater potentially impacted by off-Site sources in the Shop Street/Industrial Avenue area.

2.2 The Regional Board's Current Conceptual Site Model Conflicts with its Prior Conclusions and Those of its Contractors and Other Stakeholders

The Regional Board's current conceptual site model (CSM) — that the Regional PCE Contamination is an uninterrupted plume that derives exclusively from the LTLW — is incorrect and conflicts with the Regional Board's earlier findings. In issuing the 2017 CAO, Patty Kouyoumdjian, the Regional Board's Executive Officer at that time, concluded that:

. . . there is insufficient evidence to link all PCE contamination in the region to Lake Tahoe Laundry Works site at this time. It is possible that there are other parties responsible for portions of the PCE, which merits additional investigation. It is also possible that there are portions of the PCE plume that we are unable to tie back to a responsible party, and I want to better understand the orphan share of the regional plume if we determine, from the required investigation results, that other sources have contributed to the PCE contamination.⁶⁴

⁶² State Water Board. 30 March 2017. South Tahoe Public Utility District Planning Grant, Groundwater Planning, Feasibility Study of Remedial Alternatives to Mitigate Tetrachloroethylene Contamination. Agreement No. D1712508.

⁶³ See figures illustrating DRI particle tracking from Shop Street/Industrial Avenue area included as Attachment A to PES and EKI. 11 January 2018. *Responses to Comments Regarding Revised Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California.*

⁶⁴ 2017 CAO, at 2.

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In Paragraph 7 of the 2017 CAO, the Regional Board stated:

After consideration of the available information and comments received on the proposed CAO and the revised proposed CAO, the Site and regional groundwater investigations performed to date have not generated conclusive data identifying or eliminating the Site as the sole source of the regional PCE plume. Existing groundwater quality data cannot definitely link contaminant concentrations detected in the municipal and domestic supply wells in the region to the Site given insufficient data produced by limited scopes of the site specific and regional investigations conducted to date, the distribution of contaminants reported, location of other potential sources, the significant amount of time that has passed since the alleged historical PCE release(s) at the Site in the 1970s, and the significant fluctuations in the groundwater table from decades of intermittent municipal supply well pumping. As a result, current evidence is insufficient to require the cleanup and abatement of the regional PCE plume under California Water Code section 13304.

Nevertheless, the Regional Board now contends that the investigations it performed in 2019 and 2020 have “conclusively establish[ed]” that Regional PCE Contamination originates from the Site.⁶⁵ However, the Proposed Order does not resolve critical issues raised by the Regional Board in the 2017 CAO, such as the need to “definitely link contaminant concentrations detected in the municipal and domestic supply wells in the region” in light of off-Site sources, the “significant amount of time that has passed” since releases occurred in the 1970s, or the significant fluctuations in the groundwater table as a result of “decades of intermittent municipal supply well pumping.”

The Regional Board has long understood that a single source did not create the Regional PCE Contamination. For instance, the Regional Board has determined the former Big O Tires facility at 1961 Lake Tahoe Boulevard and the former Norma’s Cleaners (i.e., Hurzel) site at 961 Emerald Bay Road, both located squarely within the Regional PCE Contamination, are sources of PCE to groundwater. In 2005, the Regional Board concluded PCE in groundwater at the Big O Tires site did not originate from the LTLW and that conditions on Big O Tires are “primarily affected by a PCE source originating onsite.”⁶⁶ In 2019, the Regional Board concluded that investigations performed on the Big O Tires site in 2001 and 2006 show “unauthorized discharges of petroleum and chlorinated hydrocarbons in select soil and groundwater samples from past facility operations.”⁶⁷

⁶⁵ Proposed Order, at 3 ¶ 8, 6 ¶ 28.

⁶⁶ Regional Board (2005). *supra* n. 45, at 3.

⁶⁷ Regional Board. 10 May 2019. Order to Submit Technical Reports in Accordance with Section 13267 of the California Water Code, Big O Tire Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, SCP Case #T6S034, GeoTracker Global ID SL0601729739, at 9.

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The Regional Board similarly identified the former Norma's Cleaners site as a source of PCE contamination based on the results of two soil gas surveys that it performed in the South Y Area in 1992 and 1993. The soil gas surveys, conducted with Petrex tubes, revealed significant soil gas responses near Norma's Cleaners and Lampson One-Hour Cleaners/Sierra Dry Cleaners/S&S One Hour Cleaners at 2022 Lake Tahoe Boulevard. The Regional Board stated the following concerning these former dry cleaners:

Raw data from the second survey confirmed the first survey results — we were dealing with multiple sources. Both historic dry cleaners may have been sources, but there seemed to be other sources, as well, which were not as obvious.⁶⁸

In 2008, shallow excavation of PCE-containing soil was performed at the Norma's Cleaners site.⁶⁹ This remedial effort was inadequate and left contaminated soil in place on the property.⁷⁰ In 2019, the Regional Board stated "[i]nvestigations conducted in 2001, 2003, 2007 and 2008 identified chlorinated hydrocarbons in soil and groundwater samples which indicates unauthorized waste discharge(s) have occurred from past [s]ite operations."⁷¹ In 2020, the State Water Board informed representatives of the Norma's Cleaners site that the Regional Board finds the property is "a continuing source of contamination to the aquifer."⁷²

Responsible parties for the former Big O Tires and Norma's Cleaners sites have received several notices of violation from the Regional Board for not complying with directives to characterize the impacts caused by releases at their respective properties.⁷³ On 16 June 2022, the Regional Board issued proposed CAOs to investigate and remediate contamination on and off the former Big O Tires and Norma's Cleaners sites. Relying in part on the results of investigations performed by Seven Springs and Fox, the proposed CAO for the former Big O Tires facility states that PCE contamination in groundwater is migrating from the former Big O Tires facility.⁷⁴ The proposed CAO for Norma's Cleaner states PCE contamination leaching from site

⁶⁸ Regional Board. 5 January 1996. *Tahoe South Y PCE Investigation*, at 2.

⁶⁹ SECOR International Incorporated. 30 May 2008. Site Investigation Report, Former Dry Cleaning Business, 949 Emerald Bay Drive, South Lake Tahoe, CA 96150.

⁷⁰ PES. 23 August 2019. Comments on Previous Site Characterization and Remediation, Hurzel Properties, LLC., 945, 949, and 961 Emerald Bay Road, South Lake Tahoe, California.

⁷¹ Regional Board. 10 May 2019. Order to Submit Technical Report in Accordance with Section 13267 of the California Water Code, Hurzel Properties, LLC, 961 Emerald Bay Road, South Lake Tahoe, El Dorado County, SCP Case No. T6S044, GeoTracker Global ID SL0601790916, at 8.

⁷² T. Austin. (State Water Board). 15 July 2020. Email to A. Giorgianni (Rodriguez Wright LLP) *Re 961 Emerald Bay (Trestle South Tahoe LLC)*.

⁷³ See Big O Tires Cleanup and Abatement Order No. R6T-2022-(PROPOSED) at 8-9 ¶¶ 22.f-g; Proposed Cleanup and Former Norma's Cleaners Cleanup and Abatement Order No. R6T-2022-(PROPOSED), at 12 ¶ 27.h-k.

⁷⁴ Proposed Cleanup and Abatement Order for former Big O Tires facility at 4 ¶ 10.

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soil into groundwater has allowed the off-site migration of PCE in groundwater to occur.⁷⁵ These proposed CAOs show that the Regional Board is aware that the Regional PCE Contamination is not a single plume originating from one source.

The Regional Board's contractors and other stakeholders also reached findings that contradict the Proposed Order's conclusions. In 2016, an off-Site groundwater investigation conducted by URS Corporation Americas (URS) on behalf of the Regional Board found that:

PCE detections in the eastern end *were separated* from PCE detections in the western end by 1,100 feet and three locations showing non-detect concentrations. This information suggests separate PCE sources for each end of the study boundary.⁷⁶

If the Regional Board currently believes that URS's conclusion is incorrect, the Regional Board should identify specifically what it believes to be the flaws in URS's analysis.

Similarly, the Regional Board should address prior findings of the Tahoe Keys Property Owners Association (TKPOA), which operates public water system wells for the Tahoe Keys waterfront community. In 2020, TKPOA representatives determined:

High concentrations of PCE [were] detected at CPT-G06. Groundwater contamination appears to be *discontinuous* with [the] Regional Plume and could be associated with other sources (e.g. Tahoe One-Hour Cleaner, Ed's Autobody, CSK Auto).⁷⁷

The Regional Board should revise the Proposed Order and accompanying Staff Report to align its conclusions with these previous findings. If it does not do so, it should at a minimum explain how contamination from off-Site sources identified by the Regional Board, its contractors, and stakeholders can now be considered an uninterrupted plume originating from the LTLW.

2.3 PCE Contamination is Not a Single, Uninterrupted Plume

Sections 2.3.1 through 2.3.4 explain the deficiencies in the Regional Board's characterization of the Regional PCE Contamination as a single, uninterrupted plume that originates from the LTLW.

⁷⁵ Proposed Cleanup and Abatement Order for former Norma's Cleaners site, at 5 ¶ 13.

⁷⁶ URS. 19 January 2016. Final PCE Investigation Report, South Lake Tahoe, California, at 7. (emphasis added).

⁷⁷ Regional Board. 27 February 2020. *South Y PCE Technical Meeting Notes*, at 2. (emphasis added).

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2.3.1 The Regional Board should explain its depiction of the Regional PCE Contamination

The Regional Board relies on Figures 8 through 10 in the Proposed Order to establish the extent of groundwater contamination that must be addressed. These figures are depictions of the so-called South Y PCE Plume in plan and cross-section views that AECOM generated by kriging,⁷⁸ which is a geostatistical data interpolation technique. While three-dimensional computer-generated graphical displays of subsurface data are an important data visualization tool, they should not be mistaken for a CSM.⁷⁹ The exact process used to generate the PCE concentration contours presented on Figure 8 of the Proposed Order is unclear. AECOM states on page 23 of its 2022 Regional Plume Characterization Summary Report that Earth Volumetric Studio™ (EVS) software was used to produce the contours shown on the plan map incorporated as Figure 8 in the Proposed Order. However, Note 2 on Figure 8 states “PCE Plume estimation initially provided as EVS output and revised as appropriate using professional judgment.” The Regional Board should explain where, to what magnitude, and why the EVS kriging model results were altered.

Moreover, AECOM notes on page 23 of its 2022 Regional Plume Characterization Summary Report that in developing the PCE concentration contours — upon which the Regional Board relies in the Proposed Order — certain data collected before 2018 were eliminated in “the desire to represent current conditions and accounting for seasonal or longer-term variability in the data.” This selective inclusion of data may result in an incomplete understanding of the Regional PCE Contamination and potential sources. For example, no mention is made as to whether groundwater elevation measurements were considered when accomplishing the data reduction. AECOM states “PCE groundwater data collected from January 1, 2018, to September 5, 2020 was the period during which results were selected. This period (2.7 years) captured multiple seasonal cycles while being recent enough to minimize the impact of long-term plume migration.” It is unclear what AECOM means by this language or why it was attempting to minimize anything. The Regional Board should explain how this truncated data set results in an accurate depiction of the Regional PCE Contamination, including the effects of “significant fluctuations due to decades of municipal supply well pumping.” This information is critically important as AECOM’s depiction of the Regional PCE Contamination is the foundation of the Proposed Order’s requirements.

⁷⁸ AECOM (2022). *supra* n. 39, at 22-23.

⁷⁹ U.S. EPA. September 2017. Best Practices for Environmental Site Management: A Practical Guide for Applying Environmental Sequence Stratigraphy to Improve Conceptual Site Models. National Risk Management Research Laboratory. EPA/600/R-17/293, at 23.

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2.3.2 The Regional Board neglects to consider groundwater flow directions within distinct hydrostratigraphic units and their influences on PCE migration

Based on its description of the Regional PCE Contamination, it appears that the Regional Board assumes that any detection of PCE at any depth at any location north, northeast, or northwest of the LTLW means a single plume originates from the LTLW and extends to those northerly detections. That simplistic assumption is erroneous. Dissolved contaminant transport is governed by groundwater flow (i.e., advection) and diffusion.⁸⁰ As explained in this section, the plume depiction on Figure 8 does not take these processes into account and consolidates groundwater PCE data irrespective of the hydrostratigraphic units to which the data apply.

Various hydrostratigraphic units exist within the Tahoe Valley South Subbasin. Kennedy/Jenks Consultants, on behalf of STPUD, states:

Units of relatively high permeability typically correspond to coarse-grained glacial outwash, fluvial and deltaic deposits forming the basin-fill aquifer. The laterally continuous fine-grained lacustrine (lake-bed) deposits form local confining layers or aquitards that affect groundwater flow between these higher permeability deposits.⁸¹

Hydrostratigraphic units behave as subsurface “plumbing.”⁸² In the vicinity of the LTLW, groundwater within the shallow zone flows in different direction than groundwater within the middle zone. Groundwater moves to the northeast within the shallow zone and to the north-northwest within the middle zone.⁸³ Differing flow directions that influence PCE migration were not considered by AECOM in its generation of groundwater PCE concentration contours. The Department of Toxic Substances Control (DTSC) states a more complicated hydrogeological setting with multiple aquifers and confining layers will demand a more detailed CSM,⁸⁴ which necessitates contaminant concentration contour maps for each aquifer or hydrostratigraphic unit. The Regional Board’s reliance on data interpretation that does not adhere to DTSC guidance is particularly egregious because the Proposed Order⁸⁵ directs Seven Springs/Fox to prepare their CSM in accordance with that guidance.

⁸⁰ Hadley, P. and Newell, C. 2014. *The New Potential for Understanding Groundwater Contaminant Transport*. Groundwater. Vol. 52. No. 2. pp. 174-186.

⁸¹ Kennedy/Jenks Consultants (2014). *supra* n. 47, at 5-1.

⁸² U.S. EPA (2017). *supra* n. 79, at 4.

⁸³ PES. 15 June 2022. First Quarter 2022 Monitoring Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe Boulevard, South Lake Tahoe, California, at 4.

⁸⁴ DTSC. June 2012. Guidelines for Planning and Implementing Groundwater Characterization of Contaminated Sites, at 13.

⁸⁵ Proposed Order, at 20 ¶ 1.

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Groundwater PCE concentration differences in the shallow and middle zones distinguish impacts at the LTLW from the Regional PCE Contamination.⁸⁶ Groundwater PCE concentrations in the shallow and middle zones beneath Lake Tahoe Boulevard **before** initiating remediation at the LTLW were less than those presently measured in groundwater samples collected north of the street. As shown on Figures 14 through 17 of the Regional Board Staff Report, the highest PCE concentration in the shallow zone below Lake Tahoe Boulevard before starting SVE/GASS was 85.3 µg/L at LW-MW-6S in 2008 compared with Regional PCE Contamination in the shallow zone of 596 µg/L at LTLW-GW-11 in 2018.⁸⁷ Likewise, the highest PCE concentration in the middle zone beneath Lake Tahoe Boulevard was 230 µg/L at GW-7 in 2004 compared with Regional PCE Contamination in the middle zone of 503 µg/L at LTLW-GW-9, 1,680 µg/L at LTLW-GW-11, 490 µg/L at OS-2M, 570 µg/L at CPT-E01, 1,040 µg/L at LTLW-FIF, and 718 µg/L at LTLW-J4 between 2017 and 2022.⁸⁸ These higher PCE concentrations (both pre-remediation and post-initiation of remediation) distinguish the Regional PCE Contamination from impacts at the LTLW.

In addition to groundwater flow, a combination of biological, physical, and chemical actions known as natural attenuation processes can affect the fate and transport of chemicals in groundwater and, under favorable conditions, can result in a reduction of mass, toxicity, mobility, volume and/or concentration of chemicals in groundwater. These processes can include biodegradation, dispersion, dilution, sorption, volatilization, and chemical or biological stabilization, transformation, or destruction of constituents.⁸⁹ The National Research Council (NRC) states:

Every aquifer has a natural capacity to dilute or attenuate the contaminants. Dilution processes include diffusion and dispersion, while attenuation processes include sorption and chemical/microbial reactions. Such processes act to limit the rate of migration and growth of a plume.⁹⁰

⁸⁶ EKI (2019). *supra* n. 26, at 38; EKI (2019). *supra* n. 25, at 15; PES and EKI. 20 February 2020. *Response to Weiss Associates Letter Regarding South Y Basin Aquifer PCE South Lake Tahoe, California*, at 10-11; EKI. 3 April 2020. *Investigation Summary Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California*, at 10-11; PES. 16 April 2020. *Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRATP) and South Y PCE Facilities Feasibility Study (FS), South Lake Tahoe, California*, at 5.

⁸⁷ Regional Board Staff Report, at Figure 52.

⁸⁸ *Id.*, at Figure 53; AECOM (2022). *supra* n. 39, at Table 3; PES (2022). *supra* n. 83, at Table 3.

⁸⁹ U.S. EPA. 21 April 1999. *Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites*. Office of Emergency and Remedial Response. Directive 9200.4-17P, at 3.

⁹⁰ NRC. 2005. *Contaminants in the Subsurface: Source Zone Assessment and Remediation*. National Academies Press, Washington DC, at 140.

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Lower groundwater PCE concentrations upgradient cannot convert into higher PCE concentrations downgradient and cross-gradient. The most plausible explanation for higher PCE concentrations in the downgradient and cross-gradient directions of groundwater flow from the LTLW is PCE mass has been released to the subsurface at sites other than LTLW.

2.3.3 The Regional Board does not address intervening sources and their effects on PCE concentration gradients

The Regional Board's assumption that every downgradient PCE detection originates from the LTLW is irrational because it ignores the potential for intervening sources. One way to determine if an intervening source exists is to look at the "concentration gradient." A concentration gradient occurs when the amount of contaminant dissolved in groundwater is higher at one location than another. As noted by the Regional Board, "plumes composed of dissolved solvent compounds migrate with groundwater flow and decrease in concentration with distance from the source."⁹¹ Accordingly, if the Regional PCE Contamination were due to the discharge at the LTLW, then the lower PCE concentrations present beneath Lake Tahoe Boulevard prior to and during groundwater remediation at LTLW, and significantly higher PCE concentrations at downgradient locations are not possible. PCE concentrations beneath Lake Tahoe Boulevard should be higher than downgradient locations, which is not the case.

The Regional Board has stated that it suspects the source of the highest PCE concentrations in soil and groundwater near monitoring well LW-MW-1S on the LTLW is a surface release from a "pump truck that periodically delivered solvents to the Site via a hose from the truck to the indoor drum."⁹² The Regional Board believes this release involved PCE dry cleaning solvent in the form of dense non-aqueous phase liquid (DNAPL).⁹³

DNAPL leaves a trail of blobs and ganglia when it moves through the subsurface.⁹⁴ This residual DNAPL then dissolves into groundwater giving rise to aqueous-phase plumes of dissolved contamination.⁹⁵ The NRC states dissolved contaminants in groundwater always sorb to and diffuse into sediments within the

⁹¹ Regional Board (2005). *supra* n. 45, at 6.

⁹² Regional Board. 18 July 2016. Revised Cleanup and Abatement Order No. R6T-2016-PROP at 3 ¶ 7.

⁹³ Regional Board Staff Report, at 50. DNAPL, such as PCE dry cleaning solvent, is a liquid that forms a separate, immiscible phase when in contact with water. Differences in the properties of DNAPL and water result in the formation of a physical interface between the liquids that prevents the two fluids from mixing. DNAPL has a density greater than that of water.

⁹⁴ U.S. EPA. January 1992. *Estimating Potential for Occurrence of DNAPL at Superfund Sites*. Office of Solid Waste and Emergency Response. Publication: 9355.4-07FS, at 1.

⁹⁵ U.S. Department of Defense Strategic Environmental Research and Development Program (SERDP) and U.S. Department of Defense Environmental Security Technology Certification Program (ESTCP). 2014. *Chlorinated Solvent Source Zone Remediation*, at 36.

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saturated zone.⁹⁶ Dissolved contamination migrates into low permeability zones such as clay lenses. As long as the contaminant concentration is greater in the transmissive zones than in the low permeability zones, contamination will be driven into the low permeability zones. However, once the contaminant concentration declines in the transmissive zones, contamination will begin diffusing out of the low permeability zones.⁹⁷ This process is referred to as “back diffusion,” and it can sustain plumes for long periods of time. In 2002, STPUD described the prime effect that contaminant back diffusion might have on groundwater quality within the Tahoe Valley South Subbasin:

Contaminant migration is directly affected by the rate at which groundwater is supplied to the system, and the sources of this recharge (e.g. overlying soil infiltration vs. mountain front recharge). Within the basin-fill sediments, networks of sands and gravels provide pathways in which dissolved contaminants flow with groundwater supplied by this recharge. As they are being advected with moving groundwater, **contaminants will diffuse into adjacent low permeability clays and silts, where they can be sequestered for years to decades.** Sequestered contaminants slowly bleeding back into adjacent flowing channels can hamper remediation efforts and act as long-term sources to production wells.⁹⁸

The Regional Board also recognizes back diffusion of PCE from low permeability zones is an important process that needs to be understood.⁹⁹ Due to processes such as back diffusion, contaminant concentrations are highest beneath their source at any site where a chemical release has taken place.¹⁰⁰ The absence of a decreasing PCE concentration gradient in groundwater emanating from the LTLW means PCE migration in groundwater from the LTLW is not the origin of the Regional PCE Contamination and supports the conclusion that other sources have released PCE to groundwater within the Tahoe Valley South Subbasin.¹⁰¹

⁹⁶ NRC (2005). *supra* n. 90, at 27.

⁹⁷ ESTCP. March 2011. A Guide for Selecting Remedies for Subsurface Releases of Chlorinated Solvents. Decision Guide. ESTCP Project ER-200530, at 13.

⁹⁸ STPUD. 12 November 2002. Local Groundwater Assistance Grant Application for the Development of Groundwater Resources in the Presence of Contaminant Plumes, South Lake Tahoe, California, at 7. (emphasis added and citations omitted).

⁹⁹ B. Grey (Regional Board). 29 October 2018. Email to Working Parties Re Comments on Weekly Planning and Progress Reports with Request for Face to Face Technical Meeting.

¹⁰⁰ U.S. EPA. September 1990. *Handbook, Ground Water, Volume 1: Ground Water and Contamination*. Office of Research and Development. EPA/625/6-90/016a, at 109-110.

¹⁰¹ Hogan Lovells US LLP (counsel for Fox). 8 September 2016. Response to Revised Cleanup and Abatement Order for Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at 32-33; EKI (2019). *supra* n. 26, at 38-40; EKI (2019). *supra* n. 25, at 15; PES and EKI (2020). *supra* n. 86, at 5-6; EKI (2020).

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Although the Regional Board realizes the importance of back diffusion, it does not address the implications of the process nor attempt to explain how contamination in groundwater migrating from the LTLW could have resulted in PCE concentrations at the Big O Tires and Norma's Cleaners sites that are higher than those below Lake Tahoe Boulevard adjacent to the LTLW. Unable to proffer a scientific rationale supporting the finding that groundwater with significant PCE concentrations flowed off the LTLW, the Regional Board hypothesizes (1) the existence of PCE in groundwater beneath Lake Tahoe Boulevard at concentrations near the MCL of 5 µg/L is proof that the LTLW created the Regional PCE Contamination, and (2) PCE from LTLW traveled along a storm drain pipeline to Tucker Basin and subsequently leached to groundwater and formed the Regional PCE Contamination. The first hypothesis is based on the Regional Board's belief that the only way the LTLW is not responsible for the Regional PCE Contamination is if no PCE whatsoever were detected in groundwater samples collected along Lake Tahoe Boulevard.¹⁰² This theory is undone by the Regional Board's own recognition that "plumes composed of dissolved solvent compounds migrate with groundwater flow and decrease in concentration with distance from the source."¹⁰³ The second hypothesis, that PCE was transported through the vadose or unsaturated zone to Tucker Basin is uncorroborated speculation, as discussed in Section 2.6.

2.3.4 Despite its flaws, Figure 8 in the Proposed Order clearly shows the Regional PCE Contamination is due to multiple sources and is not a single plume

A contaminant plume attributable to a single source is narrow and no wider than a few times the width of the source at its head.¹⁰⁴ In contrast, "amoeba-like" or very wide plumes,¹⁰⁵ such as that depicted on Figure 8, indicate multiple sources.

The multiple distinct areas of higher PCE concentrations of 100 µg/L or more in groundwater or "hot spots" shown on Figure 8 (i.e., closed yellow- and red-shaded areas) also indicate contamination caused by releases at off-Site properties. For example, at borehole SONIC10, located along 11th Street near Eloise Avenue, PCE was measured at a concentration of 550 µg/L at an elevation of 6144 feet above mean sea level (msl).¹⁰⁶ However, no PCE has been detected in groundwater samples collected at this elevation in upgradient boreholes SONIC01 and SONIC22 or below 6210 feet msl at the LTLW itself. The highest PCE

supra n. 86, at 10-11; PES (2020). supra n. 86, at 5; PES and EKI. 14 May 2021. Response to Weiss Associates Comments Regarding South Y Basin Aquifer PCE South Lake Tahoe, California, at 2-3.

¹⁰² Regional Board Staff Report, at 68-70 ("Notably, EKI was only able to identify an 'intervening' area of lower PCE concentrations rather than an 'intervening' area where PCE contamination was not detected. The presence of lower concentrations does not support a 'plume separation' theory.").

¹⁰³ Regional Board (2005). supra n. 45, at 6.

¹⁰⁴ Siegel, D. 2008. *Reductionist Hydrogeology: Ten Fundamental Principles*. Hydrological Processes. Vol. 22. pp. 4967-4970.

¹⁰⁵ *Id.*

¹⁰⁶ AECOM (2022). supra n. 39, at Table 3.

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concentration in groundwater samples collected at elevations of 6140 feet msl or less from boreholes placed between the LTLW and SONIC10 was 44 µg/L in SONIC03.

The relative lack of PCE in the upgradient direction of SONIC10 is shown on Figure 5-5 in EKI's Investigation Summary Report, dated 1 October 2020. Figure 5-5 of that report illustrates that PCE at 550 µg/L in SONIC10 likely originates from a release in the vicinity of a 7-Eleven store along Emerald Bay Road near 10th Street. In 2016, the Regional Board also believed the source for the western portion of the Regional PCE Contamination may exist in this area. The Regional Board "strongly" believed that a small engine repair shop¹⁰⁷ near the 7-Eleven store was "responsible for the contamination and shutdown of Lukins #2 and #5 public water system (PWS) wells and Rockwater Apartments well (small community water system well) on Emerald Bay Road."¹⁰⁸ The Regional Board stated that a "suspected-source area investigation near the 7-11 Store property on Emerald Bay Road" should be performed.¹⁰⁹ The investigation advocated by the Regional Board has not been accomplished to date.

AECOM's data interpretation presented on Figure 8 in the Proposed Order adds to the false impression of an uninterrupted plume. Although not contained in the Proposed Order, Section D-D (Figure 11) in AECOM's Regional Plume Characterization Summary Report illustrates the shortcoming of Figure 8 that is included. PCE was measured at 320 µg/L in a groundwater sample obtained at an elevation of 6168 feet msl (71 feet bgs) from SONIC15, which is located at Colorado Court east of Tahoe Keys Boulevard. As shown on Section D-D, AECOM joins this contamination at SONIC15 to PCE measured at 5.4 µg/L west of Tahoe Keys Boulevard at 6147 feet msl in borehole SONIC17. Boreholes SONIC15 and SONIC 17 are approximately 1,500 feet apart and in the probable cross-gradient direction of groundwater flow from each other. Consequently, PCE in groundwater is unlikely to migrate from SONIC17 to SONIC15.

Figures 3 and 54 in the Regional Board Staff Report depicts the separation in plumes consistent with TKPOA's recognition in 2020 that groundwater PCE contamination east of Tahoe Keys Boulevard was due to different sources than groundwater PCE contamination west of this street. The Regional Board's own conjecture of a plume emanating from the LTLW does not expand east of the former Norma's Cleaners site,¹¹⁰ which is situated roughly one-half mile west of Tahoe Keys Boulevard. Nonetheless, the Regional Board accepts AECOM's data interpretation despite its implausibility and contradiction with TKPOA's

¹⁰⁷ State Water Board. 20 July 2016. *Meeting Summary — Lake Tahoe Laundry Works*, at 1.

¹⁰⁸ STPUD. 25 October 2016. 2016 GWMP Stakeholder Advisory Group Minutes, at 2.

¹⁰⁹ Regional Board. 2 September 2016. Meeting Summary to Discuss Next Steps for the South Y PCE Investigation, at 1.

¹¹⁰ L. Dernbach (Regional Board). 20 July 2016. Email to T. Carter (State Water Board). *Re Call to Lahontan RWQCB — South Lake Tahoe — Former Lake Tahoe Laundry Works (NEW TELECON #)*; L. Dernbach (Regional Board). 22 September 2016. Email to T. Carter (State Water Board). *Re STPUD*.

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determination that PCE detected at CPT-G06, which is in the vicinity of SONIC15, is associated with sources east of Tahoe Keys Boulevard.

In a similar fashion, AECOM links contamination in the middle zone at the former Big O Tires facility and former Norma's Cleaners site by extrapolating PCE concentration contours in a direction counter to the prevailing groundwater flow direction in this hydrostratigraphic unit.¹¹¹ PCE was measured at 1,680 µg/L at 6233 feet msl in borehole LTLW-GW-11, which is near the former Big O Tires facility.¹¹² Although groundwater in the middle zone has been demonstrated to flow to the northwest,¹¹³ AECOM extrapolated the 100 to 500 µg/L PCE concentration contour approximately 1,200 feet northeast to LTLW-J4, which is next to the former Norma's Cleaners site.¹¹⁴ PCE was measured at 718 µg/L at 6239 feet msl in borehole LTLW-J4. In linking these detections, AECOM ignored the PCE concentration of 10.9 µg/L at 6232 feet msl in borehole LTLW-GW-12, which is about 100 feet northeast of LTLW-GW-11, and in the same direction that AECOM mapped the 100 to 500 µg/L PCE concentration contour in the middle zone.¹¹⁵ The substantially lower PCE concentration in nearby LTLW-GW-12 indicates elevated PCE concentrations in groundwater did not move in the direction mapped by AECOM. Figure 53 in the Regional Board Staff Report depicts the separation of the 100 to 500 µg/L PCE concentration contour in the middle zone along Emerald Bay Road and the presence of another distinct area of higher groundwater PCE contamination near businesses along Ruth Avenue. As discussed in Section 3, these distinct areas of higher groundwater contamination are indicative of PCE discharges at off-Site properties.

AECOM also is incorrect that PCE in groundwater to a depth of 25 feet bgs within the shallow zone forms an uninterrupted plume that extends from the Tucker Basin in a northeast direction beyond the Eloise Avenue stormwater detention basin (Eloise Basin).¹¹⁶ AECOM denotes Eloise Basin as Dunlap Retention Pond on the plan map that is included as Figure 11 in the Proposed Order. Between 2003 and 2005, STPUD investigated Eloise Basin and did not detect PCE in soil samples obtained from the basin or in groundwater samples collected from the shallow zone beneath the basin.¹¹⁷ AECOM ignores these data and overlays the greater than 25 µg/L PCE concentration contour on Eloise Basin on Figure 11, which conflicts with STPUD's finding that no contamination exists at the basin.

¹¹¹ Regional Board Staff Report, at 73.

¹¹² AECOM (2022). *supra* n. 39, at Appendix A, Historic PCE Groundwater and Soil Databases, 1989 Through 2020.

¹¹³ PES (2022). *supra* n. 83, at Figure 3B; Regional Board. 16 June 2022. Big O Tires Cleanup and Abatement Order No. R6T-2022-(PROPOSED), at 4-5 ¶ 12.

¹¹⁴ Proposed Order, at Figure 10.

¹¹⁵ *Id.*, at Figure 9.

¹¹⁶ *Id.*, at Figure 11.

¹¹⁷ 2NDNATURE. 17 March 2006. Detention Basin Treatment of Hydrocarbon Compounds in Urban Stormwater. Final Report, at 1, 34; Rybarski, S., M. Hausner, and Bergsohn, I. 22 April 2022. Alternative Plan for Tahoe Valley South Subbasin (6-005.01), First Five-Year Update. Volume I, at 180.

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U.S. EPA advises that a CSM is developed using available data and illustrates the relationship between contaminants, transport media, and receptors.¹¹⁸ Because the Proposed Order is predicated on a CSM that does not account for locations of off-Site sources, PCE amounts these sources are contributing to the subsurface, and how groundwater flow influences PCE mass transport and distribution within the Tahoe Valley South Subbasin, the Proposed Order does not provide a valid basis for either identifying responsible parties or evaluating the need for future cleanup and abatement measures.

2.4 No Appreciable Off-Site Migration of PCE in Groundwater Occurred Before or After Remediation of LTLW

As discussed in Sections 2.4.1 and 2.4.2, no appreciable migration of PCE in occurred in groundwater before or after that SVE/GASS commenced operation in 2010.

2.4.1 Pre-remedial migration

The Regional Board's assertion that the Proposed Order is necessary because contamination likely migrated from the LTLW before the SVE/GASS was installed is unsupported by the record. The Regional Board asserts:

Over 982 pounds of VOCs (i.e., PCE) have been removed from the Site since AS/SVE system initiation. . . The design of the AS/SVE system and mass removal over time clearly shows on-Site mass was available in sufficient quantities and at depths to provide the mass loading which is consistent with the regional PCE plume and not a limited localized plume restricted to the Site and near vicinity.¹¹⁹

To state the obvious, contamination found beneath LTLW is PCE that has not migrated off-Site. If anything, the fact that this quantity of contamination still was present at the Site when cleanup began, 30 years after the dry-cleaning unit ceased operating, suggests that contamination was trapped at LTLW, and significant migration did not occur historically.¹²⁰

¹¹⁸ U.S. EPA. September 1993. *Data Quality Objectives Process for Superfund*. Interim Final Guidance. Office of Emergency and Remedial Response. EPA540-R-93-071, at 49.

¹¹⁹ *Id.*, at 71. (citations and footnotes omitted).

¹²⁰ See Hogan Lovells US LLP (2016). *supra* n. 101, at 22 (quantity of PCE spilled was insufficient to reach groundwater as DNAPL and became trapped in vadose zone soil). See also EKI (2019). *supra* n. 26, at 30-32; PES and EKI (2020). *supra* n. 86, at 7-9. The pounds of PCE referenced by the Regional Board is based on PES's estimate of the quantity of PCE **removed** from the Site by the SVE/GASS. The PCE mass removed by SVE/GASS is estimated to be 986 pounds as of 26 April 2022. See PES (2022). *supra* n. 83, at 8.

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The Regional Board's assertion regarding pre-remedial migration is further suspect because it conflicts with the Regional Board's previously held positions and existing data. In 2004, almost 20 years ago, the Regional Board considered whether contamination from LTLW had migrated to the immediately downgradient facility, the (now former) Big O Tires property, where PCE also was detected.¹²¹ Noting that contamination at LTLW was confined to shallow groundwater while off-Site contamination was found 15 to 20 feet deeper in middle zone groundwater, Regional Board staff "agree[d]" with the conclusion that "the source of contamination" is "not from the laundromat."¹²² Figures 14 and 15 of the Staff Report depict pre-remediation groundwater conditions in the shallow zone and middle zone, respectively. As shown on these figures, PCE concentrations are lower in samples collected within Lake Tahoe Boulevard than those detected on the Big O Tires site. Four years later, in 2008, the Regional Board again found that "data from investigations at other PCE sites strongly suggest" that contamination at the Site "is not a free product source that migrated to the Big O Tire site."¹²³ In 2009, the Regional Board approved the LTLW remedial action work plan, which concluded that contamination had not migrated off-Site.¹²⁴ The Proposed Order does not explain how or why the Regional Board has now reached a conclusion incompatible with its earlier positions. Certainly, no new information regarding pre-remedial conditions has become available.

2.4.2 Post-remedial migration

According to the Regional Board, PCE is continuing to migrate from the LTLW because "the remediation system was only designed to address on-Site vadose zone (unsaturated zone above groundwater) soil and shallow groundwater."¹²⁵ In 2005, the Regional Board concluded the discharge on the LTLW resulted in "shallow residual contamination in soil instead of sinking free-product in the aquifer" and PCE in groundwater is "near the water table since PCE concentrations decrease with distance from the site."¹²⁶ The Regional Board attributed PCE within the middle zone beneath Lake Tahoe Boulevard to the release at the former Big O Tires facility and possibly other off-Site sources.¹²⁷ The SVE/GASS treats only soil and shallow groundwater because the remedial action plan for the Regional Board determined these were the

¹²¹ L. Dernbach (Regional Board). 16 November 2004. Email to H. Singer (Regional Board) *Re PCE at Y*.

¹²² *Id.* See also Regional Board (2005). *supra* n. 45, at 21-23. (rejecting the LTLW as a source of the Big O Tires site contamination on various technical grounds).

¹²³ Regional Board. 7 March 2006. Amended Cleanup and Abatement Order No. 6T-2003-031A1, Big O Tires Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, at 2 ¶¶ 5, 8. (attributing contamination on the Big O Tires site to a source on that property).

¹²⁴ E₂C (2009). *supra* n. 11, at 7, Figure 3; Regional Board (2009). *supra* n. 9.

¹²⁵ *Id.*, at 23-24. See similar assertions in Proposed Order, at 3 ¶ 7, 10 ¶ 39, 11-12 ¶¶ 43-44, 47; and Regional Board Staff Report, at 21, 59, 68-69.

¹²⁶ Regional Board (2005). *supra* n. 45, at 7-8.

¹²⁷ *Id.*, at 8, 22-24.

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media impacted primarily by the PCE discharge at the Site.¹²⁸ The remedial action plan states the purpose of the SVE/GASS is to “permanently prevent or minimize the release of hazardous substances or contaminants from the site such that they do not migrate or cause imminent and substantial endangerment to present or future public health and welfare, or the environment.”¹²⁹ On 2 August 2013, the Regional Board issued Investigative Order R6T-2013-0064 approving SVE/GASS as the remedy for the LTLW.¹³⁰ In the 2017 CAO, the Regional Board acknowledged that these remedial measures were “implemented . . . in compliance with previous Water Board Directives.”¹³¹

In May 2017, groundwater samples were collected from eight SVE wells (VE-2, VE-3, VE-4, VE-5, VE-10, VE-11, VE-12, and VE-13) and nine air sparge wells (AS-6, AS-7, AS-8, AS-13, AS-14, AS-19, AS-20, AS-21, and AS-25). PCE was not measured above the laboratory analytical method reporting limit of 0.5 µg/L in 12 of the 17 samples.¹³² PCE detected in the other five samples was less than the MCL of 5 µg/L. The SVE and air sparge wells were sampled at the request of the Regional Board to “better define [the] extent of contamination” in groundwater at the Site.¹³³ The data for these wells confirm that the zones of influence (ZOIs) exerted by the air sparge wells cover the shallow zone that the Regional Board directed to be remediated and refute that the notion that the SVE/GASS was somehow inadequate.¹³⁴

If appreciable contamination dissolved in groundwater were leaving the LTLW, then elevated PCE concentrations within the shallow and middle zones would be evident due to back diffusion. The Regional Board now claims dissolved contamination along groundwater travel routes has not been found because this region still has not been sufficiently characterized,¹³⁵ but Seven Springs, separately between 2003 and

¹²⁸ E₂C (2010). *supra* n. 11, at 21, Figure 4.

¹²⁹ *Id.*, at 17.

¹³⁰ Regional Board (2013). *supra* n. 15.

¹³¹ 2017 CAO, at 1 ¶ 2.

¹³² E₂C. 2 June 2017. Second Quarter 2017 Groundwater Monitoring Report and Current Site Remediation Status Report, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at Table 1.

¹³³ Regional Board. 4 January 2017. Request for Supplemental Work Plan to Perform Batch Pumping, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, at 2.

¹³⁴ Regional Board. 16 May 2016. Comments on Air Sparge Performance Test, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, at 3. See also E₂C. 27 July 2016. Response to Comments on Air Sparge Performance Test, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; PES and EKI. 4 April 2017. Lake Tahoe Laundry Works. (responding in greater detail to Regional Board’s assertion that the SVE/GASS is allowing PCE in groundwater to migrate from the LTLW).

¹³⁵ Regional Board Staff Report, at 70. (“Lahontan Water Board staff observe that a more likely explanation for the high PCE concentrations in groundwater north of Lake Tahoe Boulevard may be attributed to off-Site migration within investigated and uninvestigated areas and depths between the shallow and middle zones (i.e., between 26 and 41 feet bgs) and off-Site transport of PCE contamination to Tucker Basin via the stormwater conveyance system.”).

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2005, and together with Fox, in 2008 and 2018, investigated groundwater conditions beneath Lake Tahoe Boulevard.¹³⁶ These investigations were performed under Regional Board supervision and entailed the combined collection of 39 groundwater samples beneath Lake Tahoe Boulevard.

The 2018 investigation was conducted after implementation of the SVE/GASS in 2010 and confirms the effectiveness of this system and the fact that no appreciable PCE in groundwater is migrating from the LTLW. In 2018, PES collected multi-depth grab groundwater samples at five locations LTLW-GW-2, and LTLW-GW-4 through LTLW-GW-7 along Lake Tahoe Boulevard. PCE concentrations in the off-Site shallow zone were low, ranging from non-detection at the laboratory analytical method reporting limit of 0.5 µg/L to 7.78 µg/L. PCE concentrations in the middle zone along Lake Tahoe Boulevard ranged from non-detection at the laboratory analytical method reporting limit of 0.5 µg/L to 28.6 µg/L. No PCE was detected in any of the groundwater samples collected at a depth of 70 feet bgs below Lake Tahoe Boulevard.¹³⁷

The Regional Board contends without justification that PCE in groundwater below Lake Tahoe Boulevard should have declined to concentrations less than the MCL of 5 µg/L by now and “‘erased’ the link between the PCE contamination originating from the Site and the regional PCE plume.”¹³⁸ PCE concentrations greater than the MCL in groundwater beneath Lake Tahoe Boulevard are not surprising. Back diffusion from low permeability layers in granular porous media can give rise to low contaminant concentrations for decades after complete removal of the source.¹³⁹

Formation of a groundwater contaminant plume is governed by the mass balance between contaminant loading and attenuation mechanisms. The Interstate Technology & Regulatory Council (ITRC)¹⁴⁰ explains, “[a]s contaminant (or mass) loading occurs from a source area into the aquifer, the mechanisms of dispersion, convection, and advection cause the contaminants to spread within the groundwater and aquifer materials.”¹⁴¹ The plume will expand if the rate of contaminant loading is greater than the rate of all attenuation mechanisms. Conversely, the plume will remain stable or shrink if the loading rate is equal to, or less than the attenuation rate, respectively.¹⁴² Thus, the lack of a significant off-Site plume

¹³⁶ EKI (2019a). *supra* n. 86, at 2-4, 10-12.

¹³⁷ Regional Board Staff Report, at Figure 8.

¹³⁸ *Id.*, at 68-69.

¹³⁹ ESTCP (2011). *supra* n. 97, at 37-38.

¹⁴⁰ ITRC is a public/private coalition that produces documents and provides training with the goal of improving technical knowledge to expedite regulatory decision making while protecting human health and the environment.

¹⁴¹ ITRC. April 2008. *Enhanced Attenuation: Chlorinated Organics*. Technical and Regulatory Guidance, at 20.

¹⁴² ITRC. August 2010. Use and Measurement of Mass Flux and Mass Discharge. Technology Overview, at 30.

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originating from LTLW is explained by a PCE loading rate to groundwater that is less than the PCE attenuation rate in groundwater.¹⁴³

The Regional Board concedes PCE dissolved in groundwater is subject to attenuation processes.¹⁴⁴ The Regional Board's rebuttal¹⁴⁵ to these phenomena is to disregard them and claim PCE concentrations less than 100 µg/L and frequently closer to the MCL of 5 µg/L in groundwater samples collected beneath Lake Tahoe Boulevard are proof that LTLW is responsible for PCE detected as high as 4,700 µg/L in groundwater beneath the former Big O Tires facility¹⁴⁶ and greater than 500 µg/L in groundwater elsewhere within the Tahoe Valley South Subbasin.¹⁴⁷ In doing so, the Regional Board ignores the likely explanation for these detections, which is that former Big O Tires and Norma's Cleaners sites discharged significant quantities of PCE to groundwater¹⁴⁸ as well as other off-Site sources.

2.5 Numerical Modeling Does Not Support the Regional Board's Assertion That LTLW is the Cause of the Regional PCE Contamination

DRI attempted to develop a numerical groundwater flow and mass transport model that simulated the evolution of Regional PCE Contamination due to a PCE release at the LTLW. DRI ignored back diffusion to simulate PCE migration from the LTLW as a detached plume (i.e., a dissolved-phase plume detached from the source location) that is a rare occurrence.¹⁴⁹ Had this assumption been accurate, the model should have been capable of simulating a release that matches the distinct areas of higher PCE concentrations in groundwater throughout the South Y Area as mapped by AECOM. However, when contamination is modeled as a single source, DRI obtained concentric PCE contours that decrease in concentration and expand in areal extent as groundwater flows from the assumed source. DRI's contours do not correspond to those mapped by AECOM. DRI failed because its CSM, which is the same one adopted by the Regional Board,¹⁵⁰ is incorrect. The Regional PCE Contamination does not originate from the LTLW.

¹⁴³ EKI (2019). *supra* n. 26, at 38.

¹⁴⁴ Regional Board Staff Report, at 55.

¹⁴⁵ Proposed Order, at 3 ¶ 7, 11 ¶¶ 43-44; Regional Board Staff Report, at 68-73.

¹⁴⁶ Harding ESE. 30 October 2001. Groundwater Investigation, Big-O Tire Center, 1961 South Lake Tahoe Boulevard, South Lake Tahoe, California, at 2.

¹⁴⁷ AECOM (2022). *supra* n. 39, at Table 3.

¹⁴⁸ See Regional Board (2019). *supra* n. 67, at 9; Regional Board (2019). *supra* n. 71, at 8; Proposed Cleanup and Abatement Order for former Big O Tires facility at 5 ¶ 16; Proposed Cleanup and Abatement Order for former Norma's Cleaners site, at 3 ¶ 6, 9-10 ¶¶ 24-25. (finalized and pending orders stating discharges at the Big O Tires and Norma's Cleaners sites have contaminated soil and groundwater at the properties).

¹⁴⁹ PES (2020). *supra* n. 86, at 4-5.

¹⁵⁰ Regional Board Staff Report, at 21.

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To generate an impacted groundwater volume that approaches the dimensions of the Regional PCE Contamination mapped by AECOM, DRI had to assume a massive DNAPL release took place at the LTLW for which there is no evidence. STPUD relied upon the DRI model to conduct a feasibility study of potential remedial actions to mitigate the Regional PCE Contamination.¹⁵¹ Due to the unreasonably large release assumed by DRI, STPUD claims the preferred remedial action will remove 770 to 3,300 pounds of PCE from groundwater over 20 years.¹⁵² In contrast, Seven Springs and Fox calculated that the total mass of PCE dissolved in groundwater is on the order of only 100 to 300 pounds.¹⁵³ The groundwater PCE concentration contour maps prepared by AECOM reflect a total PCE mass of approximately 240 pounds, which is within the range estimated by Seven Springs and Fox. AECOM's mapping supports the conclusion that the PCE mass comprising the Regional PCE Contamination is too small to have originated from a single location. A much bigger release is needed for one location to be the source of a wide region of impacted groundwater. The large-impacted groundwater dimensions associated with the smaller PCE mass results from discharges at multiple sites spread across the Tahoe Valley South Subbasin to produce the Regional PCE Contamination. This manner of discharge is consistent with the distinct areas of higher PCE concentrations of 100 µg/L or more in groundwater shown on Figure 8 (i.e., closed yellow- and red-shaded areas).

2.6 PCE Did Not Travel Off-Site from the LTLW Through Storm Drain or Sanitary Sewer Pipelines

Besides declaring the Regional PCE Contamination was created by PCE in groundwater that migrated from the LTLW, the Regional Board hypothesizes PCE traveled through a storm drain pipelines to Tucker Basin where the chlorinated solvent infiltrated the subsurface and resulted in the Regional PCE Contamination.

Seven Springs and Fox disagree with the Regional Board's interpretation and conclusions regarding the contribution of storm water and sanitary sewer conveyances at the LTLW to the Regional PCE Contamination. As summarized below and detailed in the April 2019 Investigation Summary Report¹⁵⁴, neither the Preferential Pathway Evaluation nor previous Site investigations have identified evidence that PCE as DNAPL or in dissolved form migrated off-Site along utility lines or other subsurface features that could act as preferential pathways for PCE transport. PCE concentrations in fill samples (i.e., soil matrix) surrounding the storm drain and sanitary sewer pipelines were low, ranging from non-detection at the

¹⁵¹ Kennedy/Jenks Consultants, Inc. 10 May 2020. *South Y PCE Facilities Feasibility Study*.

¹⁵² STPUD. 12 June 2020. *Responsiveness Summary for Item 12 Interim Remedial Action Plan*. Feasibility Study of Remedial Alternatives to Mitigate Tetrachloroethylene Contamination. CALSTARS Agreement No. D1712508, at 5.

¹⁵³ EKI. 24 April 2020. Transmittal of Calculations Regarding Perchloroethylene Mass in Groundwater Within South Y Area, South Lake Tahoe, California included as attachment to Seven Springs and Fox. 24 April 2020. *Supplemental Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS), South Lake Tahoe, California*.

¹⁵⁴ EKI (2019). *supra* n. 26, at 47-48.

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laboratory analytical method reporting limit of 0.00127 milligrams per kilogram (mg/kg) to a maximum of 0.106 mg/kg, which is less than the LTLW soil cleanup goal of 0.37 mg/kg.¹⁵⁵ The fill sample data do not indicate that the storm drain and sanitary sewer systems served as preferential pathways for migration of PCE from the LTLW. Further, DNAPL partitioning calculations for PCE support the findings that DNAPL did not migrate along preferential pathways to the Tucker Basin.¹⁵⁶

PCE in soil at the LTLW appears localized to the suspected source area near monitoring well LW-MW-1S. Soil matrix and groundwater sampling performed in 2004 indicate that no VOCs greater than laboratory analytical method reporting limits were measured in soil samples along the sanitary sewer pipe below and west of the former LTLW tenant space. Given the lack of PCE in soil and groundwater underneath the building, PES previously concluded it “is unlikely that significant release of PCE or other solvents occurred inside Lake Tahoe Laundry Works.”¹⁵⁷ The Regional Board concurred, stating:

Preferential pathways were considered by Water Board Staff when evaluating whether potential off-site PCE sources affected the Facility [Big O Tires Store]. The 2004 *Supplemental Site Investigation Report* for the Laundry [LTLW] site shows that extensive sampling was conducted along the sewer line on the property. When samples failed to show PCE detections, the sewer line was ruled out as a preferential pathway for contaminant migration.¹⁵⁸

While these investigations failed to identify any support for the Regional Board’s suggestion that PCE originating from the LTLW was conveyed to Tucker Basin via subsurface utilities, studies of the former Big O Tires site have identified that site as a source. Investigations have shown that the storm drain pipeline on the Big O Tires site conveyed surface water runoff from the former Big O Tires facility to Tucker Basin. The direction of flow within the pipelines from the former Big O Tires facility to Tucker Basin is evident from the fact that the invert¹⁵⁹ of the storm drain pipeline on the Big O Tires site was higher than the invert of the storm drain pipeline that enters the facility beneath Lake Tahoe Boulevard from the LTLW.¹⁶⁰ The Regional Board itself has concluded that the Big O Tires site discharged PCE to Tucker Basin:

¹⁵⁵ E₂C (2010). *supra* n. 11, at 30.

¹⁵⁶ EKI (2019). *supra* n. 26, at 47-48.

¹⁵⁷ PES (2004). *supra* n. 2, 12.

¹⁵⁸ Regional Board. 12 December 2005. Comments on Draft Amended Cleanup and Abatement Order (CAO) No. R6T-2003-031A1 for the Big O Tires Store, South Lake Tahoe, at 7-8.

¹⁵⁹ William F. Pillsbury, Inc. October 1978. Tahoe Valley Drainage Basin, Drainage Study. Sheet 4 shows the storm drain pipeline on the Big O Tires facility to be 8 inches in diameter with an invert elevation of 6264.72 feet msl.

¹⁶⁰ The storm drain pipeline is 24 inches in diameter with an invert elevation of 6263.54 feet msl at the southern edge of the Big O Tires facility.

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The presence of PCE and petroleum hydrocarbons in soil gas at the stormwater conveyance system inlet, standard stormwater management practices at the time of discharge, and Site history indicate stormwater runoff contaminated with chlorinated hydrocarbons (e.g., PCE) and/or petroleum hydrocarbons from the Site transported via surface flow, as directed by the Site's grading to the former stormwater conveyance system's drop inlet and then discharged to Tucker Basin.¹⁶¹

Given the Regional Board's determination, any further sampling activities within Tucker Basin should be performed in connection with investigation of PCE sources and preferential pathways on the Big O Tires site. As discussed above in Section 1.2, Seven Springs and Fox did not receive permission from the owners of the Big O Tires site to complete the Stage 2 Preferential Pathway Evaluation and Data Gap Investigation on that property.

As explained in the October 2019 Investigation Summary Report,¹⁶² relatively low PCE concentrations in shallow zone groundwater may be the source of PCE masses measured in the passive soil gas sampling devices placed within Tucker Basin. PCE possibly diffused from a source in the vadose zone at the Big O Tires site and migrated through backfill surrounding the storm drain pipeline that discharged surface water runoff from the former Big O Tires facility to Tucker Basin. Kerfoot states that "[m]an-made conduits for gases, such as high gas-filled porosity gravel backfill around electrical lines or pipes, can create extremely confusing spatial patterns of soil-gas concentrations if their presence is not taken into consideration."¹⁶³ Seven Springs and Fox understand that soil gas data to be obtained on the Big O Tires site will provide additional insight as to the potential source of PCE detected in the vadose zone beneath Tucker Basin.

3 THE REGIONAL PCE CONTAMINATION IS DUE TO MULTIPLE OFF-SITE SOURCES

The Regional PCE Contamination is attributable to multiple off-Site sources as discussed in Sections 3.1 through 3.5.

3.1 The Regional Board Recognizes the Existence of Known and Suspected Off-Site Sources of PCE in the Tahoe Valley South Subbasin

The Regional Board has suspected for decades that multiple sources of PCE in the Tahoe Valley South Subbasin most probably are responsible for the Regional PCE Contamination. In 1999, the Regional Board stated its intention to "direct PRPs [potentially responsible parties], likely vehicle repair and printing shops, to conduct investigations and determine whether they are sources of solvent chemicals in ground

¹⁶¹ Proposed Cleanup and Abatement Order for former Big O Tires facility, at 7 ¶ 20.f.

¹⁶² EKI (2019). *supra* n. 25, at 13.

¹⁶³ Kerfoot, H. 1990. *Soil-Gas Surveys for Detection and Delineation of Groundwater Contamination*. Trends in Analytical Chemistry. Vol. 9. No. 5. pp. 157-163.

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water and in drinking water wells.”¹⁶⁴ In 2016, sampling by the Regional Board’s contractor, URS, “narrowed the area of likely PCE discharge to a nine-block area.”¹⁶⁵ Seven Springs and Fox have provided detailed information to the Regional Board about potential sources of the Regional PCE Contamination, much of it derived from the Regional Board’s own files.¹⁶⁶ When the Regional Board refused to act on this information, Seven Springs and Fox voluntarily conducted their own sampling in 2017,¹⁶⁷ which identified PCE in groundwater near several suspected off-Site PCE sources.¹⁶⁸ As noted in Section 1.2, in 2019, the Regional Board stated “[s]everal businesses in the South Y area are known or suspected to have used, stored, or disposed of PCE or PCE-containing products” and pledged to use a \$4.6 million SCAP grant to “track down all potential sources of pollution” to the Regional PCE Contamination.¹⁶⁹ In the Proposed Order, the Regional Board acknowledges “that additional, as-yet-undetermined, sources may have contributed to the high concentrations of PCE detected north of Lake Tahoe Boulevard,”¹⁷⁰ and it continues to cite data obtained from the voluntary investigation as evidence of a discharge from the Norma’s Cleaners site.¹⁷¹

3.2 Identified “Hot Spots” are Evidence of Multiple Off-Site Sources Within the Regional PCE Contamination

The distinct areas (e.g., LTLW-GW-11, CPT-F01, LTLW-FIF, CPT-G01, CPT-E01, SONIC10, SONIC15) of higher PCE concentrations within the Regional PCE Contamination¹⁷² signify separate locations where PCE has

¹⁶⁴ Regional Board (1999). *supra* n. 50, at 4.

¹⁶⁵ URS (2016). *supra* n. 76, at 2.

¹⁶⁶ See e.g., PES. 19 October 2004. Comments on Preliminary Workplan for Additional Investigation of Chlorinated Solvents, Big O Tire Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California; PES. 10 July 2007. Comments on Soil and Groundwater Investigations at the Big O Tire Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California; EKI. 3 December 2015. Response to Water Board Notification of Consideration of No Further Action; Former Big O Tires Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California; PES. 15 December 2020. Comments on Passive Soil Gas Investigation Report, Former Big O Tires Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California; Flory, K. (PES). 27 August 2021. Email to B. Grey (Regional Board). Re Former Big O Tire Site – Comments on Revised Phase 2 Work Plan dated July 26, 2021 (identifying PCE release locations on the downgradient former Big O Tires facility); Hogan Lovells US LLP. (2016). *supra* n. 101, at 35-47 (identifying numerous known and suspected PCE sources in the South Y Area).

¹⁶⁷ Proposed Order, at 9 ¶ 33; Regional Board Staff Report, at 43.

¹⁶⁸ EKI (2017). *supra* n. 59.

¹⁶⁹ Regional Board (2019). *supra* n. 34.

¹⁷⁰ Regional Board Staff Report, at 70.

¹⁷¹ See Proposed Cleanup and Abatement Order for former Norma’s Cleaners site, at 6 ¶ 16.

¹⁷² Proposed Order, at Figure 8; Regional Board Staff Report, at Figures 52-54; EKI. 1 October 2020. Investigation Summary Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at Figure 5-5.

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been released to the Tahoe Valley South Subbasin. Prakash and Datta used kriging to generate concentration contours for different numbers and arrangements of modeled sources.¹⁷³ Contaminant concentration patterns surrounding sources modeled by Prakash and Datta¹⁷⁴ resemble those associated with higher PCE concentrations within the Regional PCE Contamination that AECOM also generated by kriging.¹⁷⁵ According to environmental forensics guidance:

At sites impacted by chlorinated solvents of a single source or release, the parent and/or daughter compounds often occur in the order of tetrachloroethene (PCE), trichloroethene (TCE), dichloroethane (DCE), and vinyl chloride (VC) from upgradient to downgradient. ***For each individual compound, the concentration typically decreases from upgradient to downgradient. In cases in which this sequence of occurrence is interrupted and/or concentration pattern is reversed, potential additional sources should be considered*** and more efforts made to collect data to confirm or rule out the hypothesis.¹⁷⁶

Consistent with the above guidance, Seven Springs and Fox corroborated that PCE “hot spots” are likely attributable to PCE releases at off-Site properties by reviewing additional information related to off-Site properties where releases of chlorinated solvents might have occurred.

3.3 Chemical Use Information Links Off-Site Sources to “Hot Spots” Within the Regional PCE Contamination

Seven Springs and Fox examined a subset of the 115 questionnaires provided by respondents that received Investigative Orders sent by the Regional Board on 3 April 2019.¹⁷⁷ The Investigative Orders were issued to 223 parties pursuant to Section 13267 of the California Water Code to assist the Regional Board in its efforts to determine the magnitude of chlorinated solvents in groundwater, identify potential sources, and develop remedial actions to restore affected groundwater to beneficial uses. Investigative Orders were sent to businesses that may have used chlorinated solvents, including historical and current

¹⁷³ Prakash, O. and Datta, B. 2013. Sequential Optimal Monitoring Network Design and Iterative Spatial Estimation of Pollutant Concentration for Identification of Unknown Groundwater Pollution Source Locations. Environmental Monitoring and Assessment. Vol. 185. pp. 5611-5626.

¹⁷⁴ See EKI (2019). *supra* n. 25, at 16 for figures from Prakash and Datta illustrating kriged concentration contours for different numbers and arrangements of sources.

¹⁷⁵ AECOM (2022). *supra* n. 1, at 22-23.

¹⁷⁶ Lu, J. 2015. Chapter 6, Identification of Forensic Information from Existing Conventional Site-Investigation Data, at 156. In *Introduction to Environmental Forensics*. 3rd Ed. Elsevier Ltd. (emphasis added).

¹⁷⁷ See Attachment 1 to Regional Board. 22 August 2019. Memorandum *Re Summary of 13267 Site History Questionnaire as of July 26, 2019*.

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dry cleaners, laundromats, carpet cleaning businesses, automotive repair shops, paint and automotive body shops, and printing shops.¹⁷⁸

Seven Springs and Fox supported their examination of questionnaires with review of other publicly available information, which included, but was not limited to: reports and correspondence posted on GeoTracker, data pertaining to hazardous waste shipments included in DTSC Hazardous Waste Tracking System, searches of environmental databases by Environmental Data Resources, Inc. (EDR) presented in EDR Radius Map™ Reports with GeoCheck®, historical aerial photographs, and city directories. Table 1 shows the correlations between suspected off-Site PCE sources and PCE “hot spots.”

Most questionnaire responses provide information only regarding current activities at the property. Information concerning past operations that may have entailed use of chlorinated solvents is lacking, even though it was specifically requested by the Regional Board.¹⁷⁹ The record does not offer any indication that the Regional Board followed up with questionnaire recipients to require them to provide this critical information. Irrespective of the incomplete chemical use history, the data that are available reveal widespread use of chlorinated solvents within the Tahoe Valley South Subbasin.¹⁸⁰ Many of the sites discovered to use chlorinated solvents coincide with PCE “hot spots” in groundwater, as shown in Table 1.

A number of businesses acknowledge in their responses past or present use of PCE at their properties, including with respect to: former Big O Tires (1961 Lake Tahoe Boulevard), Liberty Utilities (933 Eloise Avenue), Flyers Energy LLC (2070 James Avenue), South Tahoe Refuse and Recycling Services (2140 Ruth Avenue), and City of South Lake Tahoe (1663, 1669, and 1679 Shop Street). Besides LTLW, at least three dry cleaners that used PCE existed within or near the South Y Area. These former dry cleaners were Norma’s Cleaners, Tahoe One Hour Cleaners (2301 Lake Tahoe Boulevard), and Lampson One-Hour Cleaners/Sierra Dry Cleaners/S&S One Hour Cleaners (2022 Lake Tahoe Boulevard).

Some entities state that no chlorinated solvents are currently used in their operations, but hazardous waste records indicate otherwise. For example, Barton Memorial Hospital (2170 South Street) and automobile service and repair facilities at 912 Eloise Avenue (Sunshine Taxi, Inc.), 927 Eloise Avenue (Struve Automotive), 2143 Eloise Avenue (Eloise Automotive & Alignment), 1855 Lake Tahoe Boulevard (Cardinale Way Toyota), 1901 Lake Tahoe Boulevard (Les Schwab Tire Center), and 2119 Ruth Avenue (Five Star Automotive) claim no chlorinated solvents are employed in their operations. However, review of generator records or hazardous waste shipment data from the DTSC Hazardous Waste Tracking System show spent solvents have been classified and manifested for disposal from these businesses as a D039

¹⁷⁸ *Id.*, at 1.

¹⁷⁹ Section V of the Regional Board’s Chemical Storage and Use Questionnaire requests that the owner or operator answer fourteen questions pertaining to current and past operations at the property.

¹⁸⁰ See EKI (2020). *supra* n. 172, at Table 5-1 and Figure 5-6 for descriptions and locations of potential PCE sources.

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PCE Resource Conservation and Recovery Act (RCRA) hazardous waste.¹⁸¹ There is no indication that the Regional Board ever followed up with these facilities regarding the inaccuracies in their questionnaire responses, even after Seven Springs and Fox pointed these out to the Regional Board.¹⁸²

Other businesses or entities indicate chlorinated solvents may have been used or are uncertain about historical practices at their properties. Of these businesses or entities, Ed's Auto Body (2314 Lake Tahoe Boulevard), former Wheel Works (2317 Lake Tahoe Boulevard), City of South Lake Tahoe (1700 D Street), Tahoe Import Auto and Rubicon Moon Automotive (1746 and 1748 D Street), South Side Auto Body (920 Eloise Avenue), and former South Shore Motors (1875 Lake Tahoe Boulevard) have or appear to have used PCE based upon a review of environmental site assessment reports, U.S. EPA's RCRA database, and the DTSC Hazardous Waste Tracking System that indicates PCE was released or spent PCE was generated at these sites.

The absence of chlorinated solvent disposal for a business listed in the DTSC Hazardous Waste Tracking System does not preclude historical use of PCE at the property, as the DTSC database tracks only those hazardous waste shipments that occurred from 1993 to the present.¹⁸³ Certain businesses identified by the Regional Board as possibly using chlorinated solvents, initiated operations as early as the 1940s. Therefore, records of chlorinated solvent disposal between the 1940s and 1993 cannot be verified in the DTSC Hazardous Waste Tracking System. The Regional Board has not adequately investigated the historical use of chlorinated solvents at properties operating prior to 1993.

Many businesses have been assigned hazardous waste Identification (ID) numbers, but no hazardous waste shipment data are included in the DTSC Hazardous Waste Tracking System because these businesses ceased generating hazardous waste before 1993. Given the prevalence of PCE use by businesses engaged in dry cleaning, automobile maintenance and repair, printing, machining, or auto body repair, it would be reasonable to presume chlorinated solvent usage where the same types of activities have been conducted, but no documentation on chemical use and disposal is readily available.

Although Seven Springs and Fox assembled compelling evidence that many actual and potential sources of PCE exist within or near the South Y Area, it is not a complete listing of such sources. Omitted properties where current or former businesses may have engaged in activities that involved chlorinated solvents, such as dry cleaners, laundromats, carpet cleaning businesses, automotive repair shops, paint and auto body shops, and printing shops,¹⁸⁴ but for which no questionnaire was received by the Regional Board. Examples include Crow's Auto Care (931 3rd Street), Runnels Automotive (986 Emerald Bay Road), South Side Auto Body (927 James Avenue), Ken's Tire Center (2104 Lake Tahoe Boulevard), and Instant Copy

¹⁸¹ *Id.*, at Table 5-1.

¹⁸² EKI (2020). *supra* n. 86, at 5.

¹⁸³ DTSC. 2020. *Hazardous Waste Tracking System*. <https://hwts.dtsc.ca.gov/>. Accessed 22 March 2020.

¹⁸⁴ Regional Board (2019). *supra* n. 178.

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(2197 Lake Tahoe Boulevard). It is imperative that the Regional Board compel these and other businesses that have not complied with the Regional Board's Investigative Orders to submit questionnaires so that their contributions to PCE in groundwater within the Tahoe Valley South Subbasin can be properly evaluated.

Runnels Automotive and Ken's Tire Service are of particular interest. Runnels Automotive is located next to monitoring well pair OS-2S/OS-2M constructed in Tucker Avenue. Releases at the Runnels Automotive site may be contributing to PCE detected in these monitoring wells. In 1998, sampling of the City of South Lake Tahoe sanitary sewer system by the Regional Board found chlorinated solvents in a segment downstream of "vehicle parts and repair shops on Tucker Avenue."¹⁸⁵ A map included in a Regional Board letter, dated 3 October 2001, indicates PCE was detected at 1.5 µg/L at 20 feet bgs and 69 µg/L at 40 feet bgs beneath the Runnels property at 986 Emerald Bay Road.¹⁸⁶

Past and present chemical use at Ken's Tire Service also is illustrative. Like Les Schwab Tire Center and Wheel Works, chemical use at Ken's Tire Service provides insight into the chemical use of current or former businesses selling tires and performing automobile service and repair within or near the South Y Area. High Sierra, Inc. dba Ken's Tire Service, uses PCE in its operations. Review of DTSC hazardous waste generator records shows Ken's Tire Center disposed of 67 to 267 pounds of hydrocarbon solvents as D039 PCE RCRA hazardous waste per year between 2010 and 2017.¹⁸⁷ These PCE quantities correspond to roughly 5 to 20 gallons of PCE annually, assuming a PCE density of 13.5 pounds per gallon. In 2000, Ken's Tire Center disposed of 709 pounds of liquids with halogenated organic compounds as a F002 spent halogenated solvent RCRA hazardous waste.¹⁸⁸ In 2003, Ken's Tire Center disposed of 459 pounds of unspecified oil-containing waste as a F001 spent halogenated solvent used in degreasing RCRA hazardous waste.¹⁸⁹ Both F001 and F002 RCRA hazardous wastes can consist partially or completely of PCE.

Ken's Tire Center's inconsistent approach to profiling spent PCE suggests the possibility that other businesses may have misclassified spent PCE as simply unspecified oil-containing waste, hydrocarbon solvent, unspecified solvent mixture, or waste oil and mixed oil. Chlorinated solvents, including PCE, are commonly found in used oil. With respect to the presence of chlorinated solvents in used oil, U.S. EPA states:

¹⁸⁵ Regional Board (1999). *supra* n. 50, at 3.

¹⁸⁶ Regional Board. 3 October 2001. Letter to Gerald and Ann Johnson, Tahoe Supply Company, and TWGW Inc. Notice to Submit Workplan for Investigation at 1931 and 1935 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County (APN 023-351-18).

¹⁸⁷ DTSC. 15 October 2018. EPA ID Profile, High Sierra Co. Inc. dba Ken's Tire Center.

¹⁸⁸ DTSC. 23 October 2003. EPA ID Profile, High Sierra, Inc.

¹⁸⁹ *Id.*

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They are not a normal component of crankcase oil, but are indirectly introduced through careless or ignorant management practices by generators and collectors. For example, automobile mechanics often pour small amounts of degreasing solvents into tanks used primarily for storing used automotive oils.¹⁹⁰

Les Schwab Tire Center and Wheel Works also have disposed of PCE as a D039 RCRA hazardous waste. Although operators of the former Big O Tires facility have acknowledged the use of solvents containing chlorinated VOCs,¹⁹¹ no records exist in the DTSC Hazardous Waste Tracking System that show Big O Tires disposed of any wastes as either non-RCRA or RCRA hazardous waste from 1993 to 2006 when the former Big O Tires ceased operating. Big O Tires may have disposed of hazardous waste before 1993 as the DTSC database tracks only those hazardous waste shipments that occurred from 1993 to the present.

STPUD's evaluation of possible contaminating activities (PCAs) confirms Seven Springs and Fox's findings that numerous sources may be contributing PCE to groundwater within the Tahoe Valley South Subbasin. Utilizing the PCA inventory methodology¹⁹² established by the California Department of Health Services, STPUD identified **418 distinct** geographically scattered sources of potential contamination.¹⁹³ Sources identified by STPUD include gasoline service stations, automobile repair facilities, automobile body shops, and boat repair and refinishing facilities.¹⁹⁴ Pursuant to CDHS guidance documents, certain types of PCA sites in the Tahoe Valley South Subbasin have a high potential or very high potential for contaminating groundwater.¹⁹⁵ STPUD's ranking of PCA sites from low threat to very high threat is presented in its Groundwater Management Plan.¹⁹⁶

In addition, findings from Seven Spring and Fox's most recent effort in 2020 to identify known or potential sources of PCE contamination to groundwater in the South Y Area were used by the Regional Board and

¹⁹⁰ U.S. EPA. 1984. *Composition and Management of Used Oil Generated in the United States*. Office of Solid Waste and Emergency Response. EPA/530-SW-013, at 1-14.

¹⁹¹ See Strong, Mark A. 24 February 2020. Chemical Storage and Use Questionnaire, 1961 Lake Tahoe Boulevard; and Letter by W. Tarantino and S. Reisch, to P. Kouyoumdjian, Executive Officer, Lahontan Regional Water Quality Control Board, dated 23 August 2019, that provides comments to assist the Regional Board in its ongoing investigation of regional groundwater PCE contamination, particularly as it relates to the Big O Tires Investigation Order.

¹⁹² Rybarski, et al. (2022). *supra* n. 117, at Figure 6-16.

¹⁹³ STPUD. 29 March 2021. Tahoe Valley South Subbasin (6-005.01) Annual Report, 2020 Water Year, at 57.

¹⁹⁴ *Id.*, at 58.

¹⁹⁵ CDHS. January 2000. Drinking Water Source Assessment and Protection (DWSAP) Program. Revision 2, at 86-95.

¹⁹⁶ Kennedy/Jenks Consultants (2014). *supra* n. 81, at Figure 6-5.

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AECOM to categorize off-Site PCE sources to groundwater¹⁹⁷ and create a “potential source area inventory.”¹⁹⁸

3.4 The Regional Board Has Failed to Pursue Off-Site Sources of the Regional PCE Contamination

The Regional Board has a history of failing to require sources of the Regional PCE Contamination to properly investigate and remediate impacts associated with PCE releases that have occurred at these off-Site properties. Notably, the Regional Board initially granted closure of the Norma’s Cleaners site even though it had ascertained that PCE in soil on the site may be leaching to groundwater,¹⁹⁹ and at one point the Regional Board proposed closure of the former Big O Tires site, despite previously determining the site was inadequately characterized.²⁰⁰ Even after issuing orders to the owners of those sites in 2019, the Regional Board has not been able to secure completion of the requested work.

The Regional Board sent Notices of Violations (NOVs) to 24 entities that did not respond to Water Code § 13267 Investigative Orders issued to known and suspected sources of PCE.²⁰¹ The NOVs seem to have been ignored. The Regional Board still does not appear to have the information requested from entities that received the NOVs in June 2019. The Regional Board also has not followed up with other parties who provided incomplete or inaccurate information requested by the Investigative Orders. More recently, the Regional Board has not reconciled its potential source area inventory with STPUD’s PCA site threat rankings to prioritize those sites that should be investigated to determine if they are contributing PCE to the Tahoe Valley South Subbasin.

¹⁹⁷ See EKI (2020). *supra* n. 171, at Table 5-1 and Figure 5-6, and AECOM (2022). *supra* n. 39, at Table B-1 and Figure B-1 for descriptions and locations of these potential PCE sources.

¹⁹⁸ AECOM (2022). *supra* n. 39, at 9.

¹⁹⁹ Regional Board. 8 July 2003. Notice to Submit Workplan for PCE Source Investigation at 949 Emerald Bay Road, South Lake Tahoe, El Dorado County, at 1.

²⁰⁰ Regional Board. 24 July 2007. Denial of No Further Action Request, Big O Tires Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County — Cleanup and Abatement Order No. R6T-2003-031A1, at 2.

²⁰¹ See Notices of Violation, Investigative Order R6T-2019-0019 Requiring Submittal of Completed Questionnaire issued to (1) City of South Lake Tahoe, (2) Tahoe Asphalt, (3) Sierra Tahoe T Shirt Co., (4) Chevron Products Co., (5) Boscacci Group LLC, (6) Barton Health Care, (7) Barton Memorial Hospital, (8) James Martin, (9) Carol A. Cope Revocable Trust, (10) Robert and Carol Brunald, (11) Old Stage MHP CA LLC, (12) Donald and Michele Gibson (13) James and Terri Salvo, (14) Tahoe Blue Property Inc., (15) Roland A. and Trudy L. Dunn, (16) Figueroa Werbo CA LLC, (17) Joseph and Jeanette Cardinale, (18) Kaelin Haus CA LLC, (19) Jack and Augusta Morgan, (20) Metropolitan Enterprises, (21) Karen and Eugene Franceschi, (22) Robert and Edna Beaty, (23) Richard Solari, and (24) TKV Properties Holdings LLC.

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In Paragraph 34, the Proposed Order states that the Regional Board issued site-specific Water Code § 13267 investigative orders requiring suspected dischargers to assess the PCE impacts to soil, soil gas, and groundwater. The Proposed Order further states that the assessments are ongoing. Other than with respect to the former Big O Tires and Norma's Cleaners sites, Seven Springs and Fox are not aware of these investigative orders and request copies of the issued directives and any assessments that have been undertaken to date. The results of those assessments should be evaluated, and, if appropriate, additional investigations should be conducted to define the lateral and vertical extents of PCE that has emanated from the properties in question.

The Regional Board must collate the available lines of evidence so it can identify all sites that need to be investigated to determine if they have added to the Regional PCE Contamination. Attached Table 1 provides a starting point for this effort. As evidenced by the inability of Seven Springs and Fox to gain access to investigate conditions on the former Big O Tires site, testing required by the Proposed Order probably would be constrained to public right of ways (e.g., streets). Collection of data on the suspected source properties themselves is needed to establish the off-Site sources that must be abated to restore groundwater throughout the Tahoe Valley South Subbasin to its beneficial uses and to comply with the antidegradation policy embodied in State Water Board Resolution No. 68-16. Parties that have contributed to the Regional PCE Contamination should be required to remediate the impacts that have resulted from releases at their properties.

The Regional Board's own contractor, AECOM, has acknowledged the importance of evaluating the potential source area inventory "relative to the shallow regional PCE plume characterization data to help identify potential responsible parties that may be contributing to the regional PCE plume, support the siting of select soil gas sampling locations as discussed in the Soil Gas Investigation Work Plan and the Soil Gas Investigation Work Plan Addendum, and support the need for future source area investigations and remediation."²⁰² Yet, the Regional Board has made no apparent progress in accomplishing these objectives. Although the Regional Board has been aware of PCE impacts to municipal supply wells within the Tahoe Valley South Subbasin for 33 years,²⁰³ the Regional Board commits only to "continue to make a reasonable effort to identify additional dischargers contributing to the regional PCE plume."²⁰⁴

Seven Springs and Fox provided comments on the passive Soil Gas Investigation Work Plan.²⁰⁵ As noted in these comments, the State of California Environmental Protection Agency (CalEPA) advises soil gas sampling locations should be based initially on the location of known or suspected release(s), site

²⁰² *Id.* (citations omitted).

²⁰³ Proposed Order, at 3 ¶ 6.

²⁰⁴ *Id.*, at 9 ¶ 34.

²⁰⁵ EKI. 16 November 2021. Comments on AECOM Soil Gas Investigation Work Plan, South "Y" PCE Plume, South Lake Tahoe, California.

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operations, and history of chemical use.²⁰⁶ Consequently, Seven Springs and Fox recommended that the passive soil gas investigation be expanded to include (1) PCE detected in shallow zone groundwater at the western end of the South Y Area, where the Regional Board has determined an off-Site PCE source is present,²⁰⁷ and (2) all PCE source areas categorized as having a high or medium potential of contributing PCE to the Regional PCE Contamination.²⁰⁸ Passive soil gas sampling can be an effective method to identify volatile organic compound source areas in the vadose zone and generally delineate the extent. AECOM did not adopt these recommendations and the Regional Board did not acknowledge that it even considered Seven Springs and Fox's comments.

Nor has the Regional Board meaningfully assessed groundwater PCE concentration anomalies listed in Table 1 that are correlated with off-Site sources. Despite acknowledging "potential additional PCE sources may be contributing PCE mass to the regional PCE plume,"²⁰⁹ the Regional Board dismisses their significance by claiming its "[i]nitial review of groundwater data relative to source area inventory locations, did not indicate any 'hot spots' in shallow groundwater that could not be potentially attributed to the Site."²¹⁰ No rationale is offered for why LTLW is responsible for "hot spots," which, by definition, are indicative of additional sources.²¹¹

3.5 The Regional Board is Wrong That Seven Springs and Fox Did Not Consistently Apply Source Identification Criteria Under the 2017 CAO

The Regional Board asserts Seven Springs and Fox have inconsistently applied source identification criteria to potential off-Site PCE sources that has resulted in "an inaccurate analysis of source identification."²¹² The Regional Board claims that under the 2017 CAO, Seven Springs and Fox applied one set of criteria to the LTLW and a different set of criteria to other potential sources to evade investigating Tucker Basin²¹³

²⁰⁶ CalEPA. February 2020. Supplemental Guidance: Screening and Evaluating Vapor Intrusion. Draft for Public Comments, at 12.

²⁰⁷ EKI (2019). *supra* n. 26, at 16. In 2016, the Regional Board determined that a "suspected-source area investigation near the 7-11 Store property on Emerald Bay Road" should be performed. *See* Regional Board (2016). *supra* n. 109, at 1.

²⁰⁸ EKI (2021). *supra* n. 205, at 4-5.

²⁰⁹ *Id.*, at 25.

²¹⁰ Regional Board Staff Report, at 46.

²¹¹ Lu (2015). *supra* n. 176.

²¹² Regional Board Staff Report, at 44.

²¹³ *Id.*, at 25, 44.

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and have thus “failed to delineate the lateral and vertical extent of COCs [contaminants of concern] originating from the Site.”²¹⁴

Putting aside the fact that Fox was never lawfully subject to the 2017 CAO, the Regional Board’s assertion is incorrect. Contrary to the Regional Board’s assertion, Seven Springs and Fox consistently applied the source identification criteria approved by the Regional Board.²¹⁵ These criteria are described in EKI’s Amended Groundwater Investigation Work Plan²¹⁶ and listed on page 44 of the Regional Board Staff Report. Based on these criteria, a site is considered to be a source if operations associated with solvent use took place on the property; site-specific information, such as chemical use inventories, disposal records, soil samples with detections of VOCs, and/or elevated VOC concentrations in soil gas samples, indicate chlorinated solvents were used on the property; and VOC concentrations in groundwater samples collected from locations downgradient of the potential source are significantly higher than VOC concentrations in groundwater samples collected in the same hydrogeological unit from locations upgradient of the potential source.

Applying these criteria, Seven Springs and Fox identified Big O Tires site as an off-Site source.²¹⁷ The Regional Board’s criticism is perplexing because it also has determined that Big O Tires meets the source identification criteria²¹⁸ and that the site has discharged PCE to Tucker Basin.²¹⁹

The owners of the former Big O Tires site denied Seven Springs and Fox access to investigate environmental conditions on the site,²²⁰ and the Regional Board has repeatedly declined to secure that access on their behalf, as documented in Planning and Progress Reports submitted to the Regional Board.²²¹ Seven Springs and Fox complied with the investigative decision logic agreed upon by the Regional Board, which required the parties to seek access to the potential source property from the relevant landowner, and, if unsuccessful, document efforts made to obtain access and seek assistance from the

²¹⁴ Proposed Order, at 6 ¶ 26.

²¹⁵ Regional Board Staff Report, at 44.

²¹⁶ EKI (2018). *supra* n. 24, at 2-4.

²¹⁷ As described in Section 3.3, Seven Springs and Fox also have identified Runnels Automotive, which borders the east side of Tucker Basin, as a potential contributing source to contamination, if any, present in groundwater below the basin.

²¹⁸ Proposed Cleanup and Abatement Order for former Big O Tires facility at 2 ¶ 3, 2-3 ¶ 4, 3 ¶ 6, 4 ¶¶ 9-11, 5 ¶¶ 13-15, 6 ¶ 19.

²¹⁹ *Id.*, at 7 ¶ 20.f.

²²⁰ PES (2019). *supra* n. 30; EKI (2019). *supra* n. 25, at 5.

²²¹ https://geotracker.waterboards.ca.gov/profile_report?global_id=SL0601754315.

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Regional Board.²²² Seven Springs and Fox were to complete sampling upon obtaining access to the property, which, largely due to the Regional Board's unwillingness to compel access, has not occurred.

Further, the decision logic specifies that "if an additional source of VOCs to groundwater appears to have been identified," Seven Springs and Fox would "present the results to the Water Board for appropriate action."²²³ In its preparation of the decision logic, Seven Springs and Fox understood this action to mean the Regional Board would require the responsible parties for the off-Site release to characterize its impacts. Accordingly, the Regional Board issued the 2019 order to responsible parties for Big O Tires to delineate the contamination emanating from that property. As discussed in Section 2.6, potential impacts to Tucker Basin are likely associated with a release at the former Big O Tires facility and should be investigated by the responsible parties for that property.

Seven Springs and Fox also determined the former Norma's Cleaners site meets source identification criteria²²⁴ and have advised the Regional Board of significant data gaps concerning investigative and remedial actions at the property.²²⁵ The Regional Board concurs and issued an investigative order²²⁶ and a proposed CAO²²⁷ in 2019 and 2022, respectively, to responsible parties of the Norma's Cleaner site. The Regional Board concludes that the Norma's Cleaners site meets source identification criteria, including documented chlorinated solvent use, on-site contamination, and higher groundwater PCE concentrations downgradient of the site.²²⁸

²²² EKI. (2018). *supra* n. 24, at 2-3.

²²³ *Id.*

²²⁴ EKI (2019). *supra* n. 26, at 49-50.

²²⁵ PES (2019). *supra* n. 70; P. Gorman (PES) 3 November 2020. Email to B. Grey (Regional Board) *Re Comments on RMC's Investigation Work Plan for Hurzel Properties LLC (SL0601790916)*; PES. 22 December 2020. *Comments on Investigation Work Plan, Hurzel Properties, LLC., 945, 949, and 961 Emerald Bay Road, South Lake Tahoe, California*; PES. 14 May 2021. *Comments on RMC Geoscience, Inc. Soil Vapor Probe Investigation Report, Hurzel Properties, LLC., 945, 949, and 961 Emerald Bay Road, South Lake Tahoe, California*; P. Gorman (PES). 14 October 2021. Email to B. Grey (Regional Board) *Re Hurzel Site — PES Comments*; P. Gorman (PES). 1 December 2021. Email to B. Grey (Regional Board). *Re Hurzel Site — PES Comments on RMC's Phase 2 Work Plan*.

²²⁶ Regional Board (2019). *supra* n. 71.

²²⁷ Regional Board. 16 June 2022. Former Norma's Cleaners Cleanup and Abatement Order No. R6T-2022-(PROPOSED).

²²⁸ Regional Board (2019). *supra* n. 71, at 5-11; Proposed Cleanup and Abatement Order for former Norma's Cleaners site at 3 ¶ 6.a, 3-5 ¶¶ 8-13, 6-7 ¶¶ 16-18, 8-11 ¶¶ 23-26.

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4 THE PROPOSED ORDER'S REQUIREMENT THAT THE REGIONAL PCE CONTAMINATION BE DELINEATED TO NON-DETECTABLE CONCENTRATIONS IS OVERLY EXPANSIVE

The Proposed Order asserts the Regional PCE Contamination has not been fully delineated²²⁹ and requires that the lateral and vertical extents of PCE in groundwater be defined to the laboratory analytical method reporting limit of 0.5 µg/L.²³⁰ The requirement to delineate the Regional PCE Contamination as depicted by the Regional Board is overly broad. As discussed in Section 2.2, AECOM consolidated PCE data for all hydrostratigraphic units onto one plan map (Figure 8 of the Proposed Order) and then generated contours without considering groundwater flow directions and, hence, whether the contours are realistic. Additionally, AECOM omitted certain PCE data sets, such as URS's 2015 investigation, without examining the ramifications on the PCE concentration contours by doing so. A prominent effect of these flaws is distinct plumes within hydrostratigraphic units associated with off-Site sources are obscured. Distinct plumes obscured on Figure 8 are shown on Figures 52 through 54 of the Staff Report and Figure 5-5 in EKI's October 2021 Investigation Summary Report that group data by hydrostratigraphic units and account for the effects of groundwater movement.

The Proposed Order requires Seven Springs and Fox to characterize the lateral and vertical extents of improperly lumped contamination due to multiple sources.²³¹ The unreasonableness of this requirement is evident from even a superficial review of Figure 8 despite its flaws. Figure 8 depicts an area between Tahoe Valley Elementary School and Tahoe Keys Boulevard where no PCE is detected in groundwater at any depth. PCE in groundwater flanks the west and east sides of this clean area. The Regional Board does not explain how a single source, let alone the LTLW, can be responsible for this PCE distribution in groundwater and its further delineation. Because the plume depicted on Figure 8 of the Proposed Order links chlorinated VOC detections that cannot possibly be related, the delineation mandate is untethered to any meaningful metric and never could be completed.

The value of delineating lateral and vertical extents of the Regional PCE Contamination to non-detectable concentrations is questionable given the Regional Board has not identified all off-Site sources responsible for the contamination. The NRC states:

[I]t is important to avoid over-delineation of the plume at the expense of more localized source zone characterization efforts. This means that as salient information about site hydrogeology and plumes is gleaned from the larger-scale site characterization efforts, potential source zone configurations should be added to the site conceptual model.²³²

²²⁹ Proposed Order, at 6 ¶¶ 26, 28, 8 ¶ 32.j, 17 ¶ 69.

²³⁰ *Id.*, at 22 ¶ 3.a.

²³¹ *Id.*, at 3 ¶ 6, 8 ¶¶ 32.i-j.

²³² NRC (2005), *supra* n. 90, at 103.

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Off-Site sources that are sustaining the Regional PCE Contamination must be identified and remediated to restore groundwater to its beneficial uses and to comply with the antidegradation policy embodied in State Water Board Resolution No. 68-16. If off-Site sources are not abated, then the only feasible alternative for preserving groundwater as potable supply is to treat water at the wellhead, which currently is being done.

5 IMPACTS TO PUBLIC WATER SYSTEM WELLS ARE NOT DUE TO THE LTLW AND INSTEAD ARE ATTRIBUTABLE TO OFF-SITE SOURCES

The Regional Board observes that the Regional PCE Contamination has impacted public water system wells within the Tahoe Valley South Subbasin,²³³ and is requiring preparation and implementation of Interim Emergency and Permanent Water Replacement Plans.²³⁴ For the reasons discussed in Sections 2 and 3, to the extent PCE has migrated from the LTLW, the concentrations are de minimis and do not materially contribute to the impacts to public water system wells for which the Regional Board is requiring mitigation. As summarized in Section 2.4.2, groundwater samples collected in 2018 from five boreholes placed in Lake Tahoe Boulevard in the downgradient direction of groundwater flow from the LTLW contained PCE at concentrations ranging from non-detection to 28.6 µg/L. Most samples contained PCE at or below the MCL of 5 µg/L.²³⁵ By contrast, the public water system wells at issue have obviously been impacted by sources other than the LTLW. In 2021, PCE was measured as high as 130 µg/L in sentry wells installed by the Regional Board near public supply wells.²³⁶ If PCE in sentry wells were attributable to the LTLW, then PCE concentrations in groundwater along Lake Tahoe Boulevard should be higher than PCE concentrations in sentry wells. As explained in Section 2.3, back diffusion would have established a concentration gradient where PCE levels are highest near the LTLW and decrease with distance from the Site.

6 THE PROPOSED ORDER'S INTERIM EMERGENCY AND PERMANENT WATER REPLACEMENT PLAN REQUIREMENTS ARE UNREASONABLE

No justification is provided for Tasks 7.b and 7.c, implementing an Interim Emergency Water Replacement Plan and a Permanent Water Replacement Plan. Wellhead treatment involving granular activated carbon²³⁷ by TKPOA and LBWC eliminates any threat posed by the Regional PCE Contamination to public

²³³ Proposed Order, at 11 ¶¶ 46, 14-15 ¶¶ 56-58; Regional Board Staff Report, at 60-64.

²³⁴ Proposed Order, at 26-28 ¶¶ 7.b-c.

²³⁵ Regional Board Staff Report, at Figure 8.

²³⁶ A. Cazier (Regional Board). 10 December 2021. Email to Stakeholders *Re SCAP Regional PCE Plume Investigation Project Update: Preliminary Sentry Well Groundwater Sampling Results*, at Enclosure 2 Draft Figure 1 Sentry_Well_Site_Map_Event1 Concentrations.

²³⁷ Regional Board Staff Report, at 62.

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water systems.²³⁸ In 2019, STPUD and the State Water Board commissioned Kennedy/Jenks Consultants to conduct a human health risk assessment (HHRA) of public water system wells within the Tahoe Valley South Subbasin. The HHRA concluded “[t]he risks to human health from chemicals present in water from active wells currently in use as a drinking water source were found to be acceptable.” Thus, no need exists to replace public water system wells on either an interim or permanent basis.²³⁹

In 2017, STPUD conducted a survey of noncommunity water system wells that typically serve individual residences.²⁴⁰ This study shows perhaps one domestic well is in use on the eastern edge of the Regional PCE Contamination.²⁴¹ AECOM also performed a survey of noncommunity water system wells as part of the SCAP grant obtained by the Regional Board. In October 2019, AECOM collected water samples from eight noncommunity water system wells. AECOM collected samples from only eight wells because property owners denied access and many of the noncommunity water system wells are inactive and do not have functional pumps so water cannot be readily obtained from them.²⁴² In the eight samples that were collected, PCE was not measured above the laboratory analytical method reporting limit of 0.5 µg/L in seven samples and was detected at the reporting limit of 0.5 µg/L in one sample.²⁴³ Further, this detected concentration may not be representative because the laboratory indicated the PCE analytical result could be biased high.²⁴⁴ Hence, no data have been provided by the Regional Board that domestic wells within the Regional PCE Contamination have contaminants at concentrations above their respective MCLs thereby meeting the definition of an impaired well²⁴⁵ in the Proposed Order that is subject to emergency water replacement.

7 THE PROPOSED ORDER’S INVESTIGATION REQUIREMENTS ARE UNWARRANTED AND THEIR COSTS DO NOT BEAR A REASONABLE RELATION TO THE ASSOCIATED BURDEN

The Proposed Order requires investigation and submittal of work plans and reports and indicates that the burden, including costs, of those reports bears a reasonable relationship to the need for and the benefits to be obtained from the reports. This premise is valid for investigations and submittal of technical documents related to PCE at the LTLW. The requirements are not appropriate for investigations and

²³⁸ Pursuant to Health & Safety Code § 116275, a “public water system” means a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.

²³⁹ Kennedy/Jenks Consultants. 2 January 2019. *Human Health Risk Assessment for South Y Groundwater*, at 14.

²⁴⁰ Allegro Communication Consulting. 2018. *TVS Groundwater Basin Survey of Well Owners*.

²⁴¹ Rybarski, et al. (2022). *supra* n. 117, at 60.

²⁴² AECOM (2022). *supra* n. 39, at 15.

²⁴³ *Id.*, at Table 5.

²⁴⁴ *Id.*

²⁴⁵ Proposed Order, at 12 ¶ 51.

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submittal of reports that are not related to PCE at the LTLW, which includes remediation of regional PCE-impacted groundwater, and investigation and possible mitigation of regional PCE-impacted soil gas. As discussed in Sections 2 and 3, the evidence does not support the Proposed Order's assertion that the Regional PCE Contamination is due to the discharge at the LTLW.

Off-Site sources correlated with distinct areas of higher groundwater contamination (i.e., "hot spots") must be investigated by responsible parties for those sources to establish the effects the releases have on groundwater within the Tahoe Valley South Subbasin. Until off-Site sources are thoroughly characterized, the Regional Board lacks sufficient data to show the discharge at the LTLW is the cause of the Regional PCE Contamination. Without the requisite evidence to link the Regional PCE Contamination to the LTLW, any requirements imposed on Seven Springs and Fox to investigate and submit reports related to regional PCE-impacted groundwater and soil gas are unreasonable and cumbersome. Therefore, the requirements for these investigations and submittal of technical documents should be removed from the Proposed Order.

Putting aside the lack of evidence showing the Regional PCE Contamination is due to the LTLW, the cost of investigations required by the Proposed Order is unwarranted and disproportionate to any benefit. The Regional Board has been investigating the Regional PCE Contamination for over thirty years. The Regional Board, Seven Springs, and Fox each have spent many millions of dollars performing these investigations. Given the number of PCE sources within the Regional PCE Contamination and the practical and legal challenges in pursuing them, the only plausible remedial approach is wellhead treatment. Millions of dollars in further investigation will not change that.

If the Regional Board nonetheless persists in requiring the additional investigations described in the Proposed Order, it should provide more information to how investigation costs were calculated and correct apparent calculation errors. For example, the cost summary table in Attachment B, 5-Year Cost Estimate Scenario includes a line item for "regulatory oversight" at a "lump sum" cost of \$1,000,000. However, the calculated total for this line item indicates a cost of \$600,000, which appears erroneous (i.e., $\$1,000,000 \times 1 \neq \$600,000$). Seven Springs and Fox request this apparent error be corrected. Further, Seven Springs and Fox ask that the Regional Board provide details (e.g., number of hours, labor rates, rationale) and justification of the projected \$600,000 to \$1,000,000 regulatory oversight costs noted in the 5-Year and 25-Year Cost Estimate tables, respectively. The projected regulatory oversight costs appear to be excessive; especially in comparison to the projected labor hours to actually perform and complete the work. The Regional Board projects 12,871 labor hours for performance of field activities and preparation of reports related to Proposed Order Required Actions (i.e., Tasks 1 through 6, and 9). These 12,871 hours equate to a labor cost of \$1,476,586. It is unclear why the \$600,000 regulatory oversight costs are 41 percent of the labor cost to perform this work (i.e., $\$600,000 / \$1,476,586 = 41\%$).

Paragraph 59 of the Proposed Order provides a summary of "order of magnitude" costs and states, "[m]any of these costs are controllable and may be reduced significantly with aggressive and prompt remediation efforts." However, the cost estimates provided in Attachment B are for investigation and

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monitoring activities; not “remediation efforts.” It is not apparent how accelerated remedial actions could reduce investigative costs associated with Task 1 (Conceptual Site Model), Task 2 (Sampling and Analysis Plan and Quality Assurance Project Plan), Task 3 (Develop, Submit, and Implement Site Investigation Work Plan), Task 4 (Develop, Submit, and Implement a Monitoring Well Installation Work Plan), Task 5 (Develop, Submit, and Implement a Vapor Intrusion Investigation Work Plan), and Task 6 (Prepare and Submit Human Health and Ecological Risk Assessment). Indeed, under the Proposed Order, it is not clear that accelerated remedial actions are permitted in advance of completing the required investigations.

The Regional Board asserts, “extensive solvent plume cases have been resolved with high resolution investigation and remediation, reducing high concentration solvent plumes down to MCLs within a span of three to five years.”²⁴⁶ Multiple off-Site sources are responsible for formation of the Regional PCE Contamination, which AECOM estimates is approximately 1.5-miles long, 1-mile wide, and as deep as 240 feet bgs, as noted in Section 2. The timeframe for remediating this contamination depends (1) on the rates at which PCE back diffuses from low permeability zones that have contacted PCE-impacted groundwater, and (2) the Regional Board’s ability to locate and institute source control at the properties where PCE continues to leach to groundwater. Seven Springs and Fox believe the likelihood is remote that groundwater throughout the Tahoe Valley South Subbasin can be restored to its beneficial uses within 5 years considering the Regional Board has been unable to determine the off-Site sources causing the Regional PCE Contamination despite more than 30 years of trying to do so. Any attempt to clean up the Regional PCE Contamination will be protracted and/or fail without proper source characterization and removal. The costs of investigating and remediating PCE in groundwater to non-detectable concentrations are indeterminate unless the Regional Board identifies and requires abatement of the off-Site sources that are sustaining the Regional PCE Contamination.

8 EFFECTIVE REMEDIAL ACTIONS ARE IN PLACE AT THE LTLW

PCE impacts to soil, soil gas, and groundwater at the LTLW are being remediated by the SVE/GASS, which consists of 6 horizontal SVE wells, 20 vertical SVE well pairs, and 27 air sparge wells.²⁴⁷ Each SVE well pair consists of one well with a screen interval between approximately 5 feet bgs and 10 feet bgs and the other with a screen interval between approximately 10 feet bgs and 12 feet bgs. SVE well pairs are spaced 30 feet from each other. This spacing maintains overlapping radii of influence (ROIs) between the well pairs was designed such that the entire vadose zone within the cleanup area is addressed by SVE. Consistent with this fact, E₂C found that “[v]acuum influence over the entire site, including under the building and into Lake Tahoe Boulevard, can be readily achieved using all shallow SVE wells.”²⁴⁸ The air

²⁴⁶ Proposed Order, at 14-15 ¶ 59.

²⁴⁷ E₂C (2010). *supra* n. 11, at 21.

²⁴⁸ *Id.*, at 15.

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sparge wells are installed in a triangular pattern and individual wells are spaced so their ZOIs overlap to remediate PCE-containing groundwater resulting from the discharge at the LTLW.²⁴⁹

The Regional Board indicates that due to “declining AS/SVE system performance and contamination identified outside of [the AS/SVE] radius of influence, the Dischargers must continue to evaluate other remedial options to enhance removal of the residual contaminant mass and to address ongoing off-Site COC migration in groundwater.”²⁵⁰ The SVE/GASS is not displaying “declining system performance” as characterized by the Regional Board. Contaminant mass removal rates of SVE systems are understood to decrease along a first-order (exponential) decay curve with high initial rates that eventually attain an “asymptote” level.²⁵¹ The SVE/GASS has reached this asymptotic stage. The VOC mass removal rate has dropped from approximately 100 grams per day upon start-up in 2010 to presently less than 1 gram per day.²⁵² In June 2022, Seven Springs initiated optimization of the SVE/GASS²⁵³ with the goal of maximizing the VOC mass removal rate consistent with U.S. EPA guidance.²⁵⁴

Seven Springs and Fox concur with the Regional Board that batch groundwater pumping was effective in reducing PCE concentrations in groundwater. Batch pumping activities were stopped based on the Lahontan Regional Board’s concerns that batch pumping activities could affect the results of off-Site groundwater investigation activities. Seven Springs and Fox agree that batch pumping and other remedial technologies at the Site should continue to be evaluated, as appropriate.

Seven Springs and Fox also agree with the Regional Board that an in-situ chemical oxidation (ISCO) pilot study performed in November 2019 indicates that ISCO significantly reduced PCE concentrations remaining in the capillary fringe and shallow groundwater, and ISCO is a potential remediation technology that can reduce PCE mass in shallow and middle zone groundwater.”²⁵⁵ The Proposed Order states that the Responsible Parties “[m]ust continue to evaluate other options to enhance removal of the residual contaminant mass and to address ongoing COC migration in groundwater.”²⁵⁶ On 12 August 2021, Seven

²⁴⁹ E₂C (2016). *supra* n. 134.

²⁵⁰ Proposed Order, at 10 ¶ 39.

²⁵¹ U.S. Department of Energy. February 2013. *Soil Vapor Extraction System Optimization, Transition, and Closure Guidance*. PNNL-21843. RPT-DVZ-AFRI-006. Pacific Northwest National Laboratory, at 2.4.

²⁵² PES (2022). *supra* n. 83, at Table 6.

²⁵³ PES. 15 September 2022. Second Quarter 2022 Monitoring Report, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at 5.

²⁵⁴ U.S. EPA. February 2018. *Engineering Issue: Soil Vapor Extraction (SVE) Technology*. Office of Research and Development, National Risk Management Research Laboratory, Land and Materials Management Division. EPA/600/R-18/053, at 30.

²⁵⁵ Proposed Order, at 11 ¶ 41.

²⁵⁶ *Id.*, at 10 ¶ 39.

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Springs submitted Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater (“MZA Work Plan”) to the Regional Board.²⁵⁷

The MZA Work Plan was submitted to perform a pilot study to evaluate remedial technology for VOC-impacted groundwater within the middle zone or MZA beneath the LTLW. On 16 November 2021 and 1 December 2021, the Regional Board issued correspondence halting the pilot study that would have further evaluated remedial technologies to address PCE-impacted groundwater.²⁵⁸ On 2 December 2021, Morrison Foerster submitted correspondence to the Regional Board regarding the correspondence halting the proposed pilot study.²⁵⁹ The Morrison Foerster correspondence stated (1) “[f]irst, with its actions, the Regional Board has unnecessarily halted ongoing cleanup and remediation efforts underway on the Site, to the detriment of the residents of the city of South Lake Tahoe;” and (2) “[t]he Middle Zone Remediation Evaluation Workplan was just another means by which Seven Springs sought to test new technologies for further remediation of the Site, yet the Regional Board, by its December 1 Updated Notice, needlessly stopped such important work from proceeding.” In January 2022, Seven Springs requested a meeting with the Regional Board’s Executive Officer, Michael Plaziak, to discuss aspects of the LTLW and the proposed MZA pilot study for middle zone groundwater. However, counsel for the State Water Board denied the request to meet with the Executive Officer due to a prohibition on “ex parte” communications while the Proposed Order was pending; as such, further evaluation of additional on-Site remediation was halted.²⁶⁰

²⁵⁷ PES. 12 August 2021. Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, California.

²⁵⁸ Regional Board. 16 November 2021. Notice of Deficient Workplan, August 12, 2021 *Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater*, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043; Regional Board. 1 December 2021. *Updated Notice of Deficient Workplan, August 12, 2021 Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater*, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043.

²⁵⁹ Morrison Foerster. 20 December 2021. Notice of Deficient Workplan, August 12, 2021 *Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater*, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043, dated November 16, 2021, and *Updated Notice of Deficient Workplan, August 12, 2021 Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater*, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043, dated December 1, 2021.

²⁶⁰ T. Austin (State Water Board). 1 February 2022. Email to W. Tarantino (Morrison Foerster) Re Request for Meeting — Remediation at the Lake Tahoe Laundry Works Site and the Tahoe Valley South Basin.

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9 THE WORK REQUIRED BY THE PROPOSED ORDER IS UNREASONABLE AND UNWARRANTED

Most of the work specified in the Proposed Order pertains to investigation and remediation of the Regional PCE Contamination for which the release at the LTLW is not the cause. The Proposed Order is not needed to complete cleanup of the LTLW, which already is being successfully remediated. Apart from these concerns, much of the work sought by the Proposed Order is inappropriate or improper.

9.1 Conceptual Site Model

Task 1 of the Proposed Order requires Seven Springs and Fox to develop a CSM. However, development of the CSM is not a stand-alone effort as reflected in the Proposed Order. Both DTSC and U.S. EPA indicate a CSM is part of the data quality objective (DQO) process,²⁶¹ which is a seven-step iterative approach to preparing the field sampling plan (FSP) for environmental data collection efforts. The first six steps of the DQO process define the purpose of the data collection effort, clarify what the data should represent to satisfy this purpose, and specify the performance requirements for the quality of information to be obtained from the data. These outputs are then used in the seventh and final step of the DQO process to develop a data collection effort that meets performance criteria and other design requirements and constraints.²⁶²

In 2017, Seven Springs and Fox included a CSM in initial versions of the Groundwater Investigation Work Plan that were submitted to the Regional Board to comply with the 2017 CAO.²⁶³ The CSM in these work plans was described as follows:

Results of sampling at the Site, which includes testing beneath the former LTLW tenant space, indicate that VOC-impacted soil and groundwater are limited primarily to the parking lot north of the existing Site building. Our preliminary CSM is that a surface release or releases of PCE occurred at the Site when a delivery truck leaked PCE in the parking lot.

²⁶¹ DTSC (2012). *supra* n. 84, at 8-10; U.S. EPA. January 2000. *Data Quality Objectives Process for Hazardous Waste Site Investigations, EPA QA/G-4HW*. Final. Office of Environmental Information. EPA/600/R-00/007, at 2; U.S. EPA. February 2006. *Guidance on Systematic Planning Using the Data Quality Objectives Process, EPA QA/G-4*. Office of Environmental Information. EPA/240/B-06/001, at 15-18; U.S. EPA. March 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Evaluating, Assessing, and Documenting Environmental Data Collection and Use Programs, Part 1: UFP-QAPP Manual*. Final. Version 1. Intergovernmental Data Quality Task Force. EPA-505-B-04-900A, at 39.

²⁶² U.S. EPA (2000). *supra* n. 261, at 2.

²⁶³ EKI. 26 July 2017a. Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; EKI. 11 September 2017b. Revised Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California.

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The surface release migrated downward and resulted in VOC-impacted unsaturated or vadose zone soil.

The resulting vadose zone contamination affected shallow zone groundwater at the Site, but has not significantly impacted middle zone groundwater or off-Site groundwater conditions. The SVE/GASS is successfully remediating on-Site contamination and is preventing its migration from the Site. PCE contamination in shallow and deeper groundwater off-Site is attributable to releases at properties other than LTLW. The CSM is supported by information and data collected to date, including data compiled from investigative and remedial activities performed on and off the Site by the Working Parties and separate entities; and various findings made by the Water Board, STPUD, and DRI.²⁶⁴

Stakeholders criticized the above CSM and asserted it did not incorporate “all existing data relevant to understanding the fate and transport of PCE and related compounds throughout the South Y area.”²⁶⁵ Seven Springs and Fox, referred to as the “Working Parties” at that time, explained that it was not worthwhile, or even logistically possible, to create a CSM to define contamination throughout the South Y Area in an initial work plan.²⁶⁶ The CSM was intended to assist with identifying and prioritizing data gaps associated with potential contamination originating from the LTLW. Regardless, Seven Springs and Fox agreed to remove the CSM from the work plan so sampling activities required by the 2017 CAO could begin.²⁶⁷

Groundwater VOC data and information regarding off-Site sources obtained after the work plan was approved by the Regional Board in 2018 confirm the validity of Seven Springs/Fox’s CSM. Task 1 should be omitted because Seven Springs and Fox have developed an accurate CSM that could be included as an element of the FSP, which presumably is equivalent to the Site Investigation Work Plan (SIWP) that the Proposed Order requires in Task 3.

Task 1 also should be removed from the Proposed Order because the Regional Board insists Seven Springs and Fox incorporate environmental release and transport mechanisms into the CSM that are controverted by available data and information. U.S. EPA states the following about the ramifications that a faulty CSM can have on investigation and remediation of a site:

²⁶⁴ EKI (2017b). *supra* n. 263, at 3-1.

²⁶⁵ Ground Zero Analysis, Inc. 27 September 2017. *Comments on the September 11, 2017 EKI Revised Groundwater Investigation Workplan*. Prepared for Tahoe Keys Property Owners Association, at 1.

²⁶⁶ PES and EKI (2018). *supra* n. 63, at 2.

²⁶⁷ *Id.*, at 3.

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It is critical to carefully develop an accurate conceptual model of the environmental problem, as this model will serve as the basis for all subsequent inputs and decisions. . . Errors in the development of the conceptual model will be perpetuated throughout the other steps of the DQO Process and are likely to result in developing a sampling and analysis plan that may not achieve the data required to address the relevant issues.

The Regional Board wants to dismiss the presence of hydrostratigraphic units within the Tahoe Valley South Subbasin despite their identification by Kennedy/Jenks Consultants²⁶⁸ and other scientists that have studied the matter.²⁶⁹ The Regional Board claims there is a hydraulic connection between shallow and middle zone groundwater that “refute[s] a fundamental basis of the Dischargers’ CSM, that a silt layer is purportedly preventing downward vertical migration of PCE and other COCs in groundwater.”²⁷⁰ In making this claim, the Regional Board disregards investigative findings that show silt and other fine-grained layers inhibit (i.e., slow or retard) vertical groundwater movement in the Tahoe Valley South Subbasin. A study of stormwater infiltration conducted for the Tahoe Regional Planning Agency (TRPA) determined “[t]here is particularly high confidence that little groundwater recharge from stormwater will occur in locations where continuous confining layers are present that physically separate the shallow groundwater table from deeper aquifers, as in South Lake Tahoe.”²⁷¹

Further, Seven Springs and Fox have never stated that a slit layer is “preventing downward vertical migration of PCE” or that the silt layer was an impermeable barrier, as the Regional Board alleges.²⁷² Instead, Seven Springs and Fox have noted that the presence of fine-grained layers at and in the vicinity of the Site retards vertical groundwater flow and contaminant movement from shallow to middle zone groundwater. Lithologic data collected from the Site indicate the presence of a silt layer beginning at

²⁶⁸ Kennedy/Jenks Consultants (2014). *supra* n. 47, at 5-1.

²⁶⁹ See e.g., Morgan et al. 2008. Glacio-Lacustrine Stratigraphy, Aquifer Characterization and Contaminant Transport: A Case Study in South Lake Tahoe, California, USA. *Hydrogeology Journal*. Vol. 16. pp. 981-994. (“The general continuity of these fine-grained lacustrine units within the South Y area at the 6-15 m [20-50 ft] depth interval is supported by the lithologic record reviewed for this study, as well as hydraulic head differences and contaminant migration patterns. It is recognized that the potential for discontinuity exists. However, no evidence of discontinuities in the lithologic data or water-level data was observed.”).

²⁷⁰ Proposed Order, at 11 ¶ 42.

²⁷¹ 2NDNATURE. August 2011. Synthesis of Existing Information, Infiltration BMP Design & Maintenance Study. Final, at 51.

²⁷² Proposed Order, at 11 ¶ 42.

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depths of roughly 30 to 35 feet bgs.²⁷³ Large differences in hydraulic heads between paired groundwater monitoring wells²⁷⁴ confirms fine-grained layers inhibits vertical groundwater flow.

Task 1.c of the Proposed Order compels development of a CSM based on Regional Board opinions that are unsupported or contrary to available data. The Proposed Order should be revised to remove Task 1 entirely because (1) the CSM will be included in the SIWP required by Task 3 of the Proposed Order, and (2) Seven Springs and Fox cannot lawfully adopt a CSM that is unsupported or contrary to available data as Task 1.c directs the parties to do.²⁷⁵

9.2 Sampling and Analysis Plan and Quality Assurance Project Plan

Task 2 of the Proposed Order is confusing due to the terminology used to describe the work to be performed. The task specifies preparation of a Sampling and Analysis Plan (SAP) and a Quality Assurance Project Plan (QAPP). Typically, the QAPP is a component of the SAP or work plan, which also includes the FSP.²⁷⁶ The Proposed Order does not require preparation of an FSP but does direct Seven Springs and Fox to prepare a SIWP under Task 3. The Regional Board should clarify if the SIWP is equivalent to an FSP and explain how the SAP differs from the SIWP, if at all.

More importantly, the Regional Board has previously approved a work plan with a QAPP that Seven Springs and Fox submitted to fulfill requirements of the 2017 CAO.²⁷⁷ This work plan²⁷⁸ describes the “procedural and analytical requirements for sampling soil, soil gas, surface water (if applicable), subsurface utility backfill (e.g., stormwater and sanitary sewer conveyance system backfill) and groundwater”²⁷⁹ that the Regional Board requires in preparation of the SAP. Task 2 should be revised to

²⁷³ EKI (2019). *supra* n. 26, at 22.

²⁷⁴ Measured hydraulic head differentials include 10.87 feet for LW-MW-1S/D in March 2019, 8.20 feet for LW-MW-2S/D in April 2022, 10.86 feet for LW-MW-5S/D in June 2019, 4.75 feet for OS-2S/M in June 2019, 14.49 feet for OS-3S/M in November 2021, and 8.71 feet for OS-4S/M in March 2019.

²⁷⁵ The Proposed Order, at 32 ¶ 12, requires Seven Springs and Fox to hire “an appropriately experienced California registered professional civil engineer or geologist” to prepare — and sign — “all reports” required under the Proposed Order, in accordance with California Business and Professions Code §§ 6735, 7835, and 7835.1. Under the same paragraph, “the authorized representative” must certify under penalty of law that he or she “has examined and is familiar with the report and that to his knowledge, the report is true, complete, and accurate.”

²⁷⁶ DTSC (2012). *supra* n. 84, at 8; U.S. EPA (2000). *supra* n. 261, at 4.

²⁷⁷ Regional Board. 22 August 2018. Conditional Acceptance of March 19, 2018, Amended Groundwater Investigation Work Plan, Lake Tahoe Laundry Works (LTLW), South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043.

²⁷⁸ EKI (2018). *supra* n. 24.

²⁷⁹ Proposed Order, at 21 ¶ 2.a.

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provide that the QAPP previously approved by the Regional Board under the 2017 CAO meets the QAPP requirements of the Proposed Order.

9.3 SIWP(s)

The Proposed Order requires development, submittal, and implementation of one or more SIWP(s). Task 3 of the Proposed Order states that a SIWP is to update on-Site and off-Site information with the data required to define the lateral and vertical extents of the alleged discharge to soil, soil gas, and groundwater to support evaluation of potential threats to human health, and sensitive (e.g., schools, day care facilities, and nursing homes) and ecological receptors. Among other requirements, the SIWP must fully assess the extent of discharges along or to:

- Preferential pathways (e.g., stormwater conveyance system including Tucker Basin and other stormwater retention/infiltration basins in the system, sanitary sewer, other subsurface utilities).
- Vertical conduits (e.g., water supply wells and monitoring wells).
- Surface water (e.g., stormwater conveyance system infiltration/detention basins).

The assessment results are to be used to support development and submittal of (1) Monitoring Well Installation Work Plan, (2) Vapor Intrusion Investigation Work Plan, (3) HHRA and Ecological Risk Assessment, and (4) recommendations for interim remedial actions, including supply of replacement water. The Proposed Order defines “fully assess” to mean Seven Springs and Fox:

. . . must perform step-out sampling, both laterally and vertically, until soil and soil vapor concentrations are defined to the applicable ESLs (i.e., direct exposure, vapor intrusion, terrestrial habitat, leaching to groundwater) and groundwater concentrations of COCs are defined to 0.5 µg/L (i.e., the reporting limit for each COC; the method detection limit will be utilized as the practical limitation for defining natural background concentrations). If investigation data are being collected to support the Human Health and Ecological Risk Assessment, applicable health and ecological-based screening levels shall be considered when developing data quality objectives for the SIWP.²⁸⁰

As discussed in Section 4, the NRC advises against over-delineation of the plume boundaries at the expense of source characterization efforts. As a technical matter, Seven Springs and Fox are unable to characterize PCE in groundwater beneath Lake Tahoe Boulevard to 0.5 µg/L because PCE at or near the MCL of 5 µg/L at that location abuts Regional PCE Contamination originating north of Lake Tahoe Boulevard, most likely at the former Big O Tires facility based on available groundwater data. As explained in Sections 9.5 and 9.6, defining PCE concentrations in soil and soil gas to applicable Environmental

²⁸⁰ Proposed Order, at 22 ¶ 3.a.

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Screening Levels (ESLs) is not indicated given impacts to these media from the LTLW discharge have been fully characterized, and an HHRA and an ecological risk assessment for the LTLW is not warranted.

SIWP requirements are based on the Regional Board's incorrect assumption that the Regional PCE Contamination originated from the LTLW. For the foregoing reasons herein, the evidence does not indicate the Regional PCE Contamination was caused by PCE as DNAPL or in dissolved form that migrated off the LTLW in groundwater or along utility lines or other subsurface features that could act as preferential pathways for contaminant transport. As a result, the Proposed Order should not require an SIWP to address the Regional PCE Contamination.

The Proposed Order does not mention that the Regional Board has retained AECOM to investigate the vapor intrusion (VI) exposure pathway or explain how the VI assessment required by Task 3 is not duplicative of AECOM's investigation. According to AECOM's Soil Gas Investigation Work Plan:

AECOM will review the data [gathered] and perform a Tier I risk evaluation for potential human health risk associated with the subsurface-to-indoor-air/VI pathway," including:

- Comparing the soil gas volatile organic compound (VOC) results to ESLs;
- Evaluating the shallow and deep soil gas results to assess the strength of the groundwater vapor source (deep samples) and the degree of soil gas attenuation between the groundwater vapor source and the shallow soil gas samples; and
- Providing recommendations as to whether further investigation, such as collecting additional soil gas samples or indoor air/sub-slab samples, is warranted.²⁸¹

Regional Board communications indicate that the investigation outlined in the Soil Gas Investigation Work Plan and its Addendum²⁸² was scheduled to begin the "the first week of July."²⁸³ On 25 July 2022, Morrison Foerster, on behalf of Seven Springs, sent a letter to the Regional Board that stated:

Seven Springs requests the laboratory data from AECOM's soil gas investigation as soon as it becomes available. Despite the investigation's overlap with the comment period, the findings from the soil gas investigation will be critical to Seven Springs' evaluation of the Proposed LTLW, Big O Tires, and Norma's Cleaners CAOs. Seven Springs and Fox cannot

²⁸¹ AECOM. 5 October 2021. Soil Gas Investigation Work Plan, South "Y" PCE Plume South Lake Tahoe, California, at 1.

²⁸² https://geotracker.waterboards.ca.gov/view_documents_all?global_id=T10000007984&doc_id=6058310.

²⁸³ A. Cazier (Regional Board). 13 June 2022. Email to Stakeholders *Re SCAP Regional PCE Plume Investigation Project Update*.

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provide a complete assessment of, for example, Paragraphs 36, 37, and 65 and Required Action No. 5 of the Proposed Order without access to the data collected pursuant to the Regional Board's soil gas investigation of the regional plume.²⁸⁴

On 28 July 2022, the Regional Board indicated that the data from the soil gas investigation would be made available to interested parties as soon as full data packages are available.²⁸⁵ It is imperative that the soil gas investigation results be made available as soon as possible to aid in understanding soil gas conditions at the locations sampled and to avoid repeating work that the Regional Board has performed. Without the soil gas investigation results, Seven Springs and Fox cannot determine the VI scope of work, if any, to include in the SIWP pertaining to the discharge at the LTLW.

The Proposed Order requests a schedule for implementation of the SIWP and indicates that “[s]tep-out sampling shall proceed without significant interruption.”²⁸⁶ The Proposed Order further states that “[a]ny failure to continue conducting sampling for a period exceeding ten business days is a significant interruption.”²⁸⁷ The proposed schedule is unreasonable and is based on the mistaken premise that the Regional PCE Contamination originated from the LTLW. In the Staff Report included with the Proposed Order, the Regional Board discusses briefly the two orders issued to the former Big O Tires Site and the Norma's Cleaners site as well as the Water Code § 13267 Investigative Orders sent to 223 parties. Seven Springs and Fox should not be held responsible for investigation of PCE impacts that are due to releases at other properties. Implementation of a continuous investigation or investigations downgradient of potential sources of PCE that have not been thoroughly investigated would surely result in just that.

9.4 Monitoring Well Installation Work Plan

Task 4 of the Proposed Order requires Seven Springs and Fox to prepare and implement a Monitoring Well Installation Work Plan (MWIWP) that evaluates the behavior of the Regional PCE Contamination.²⁸⁸ Inclusion of this task in the Proposed Order is inappropriate and should be omitted because the Regional PCE Contamination is associated with releases at off-Site properties and not the LTLW, as explained in Sections 2 and 3.

²⁸⁴ Morrison Foerster (counsel for Seven Springs). 25 July 2022. Request for Comments — Cleanup and Abatement Orders R6T-2022-(Proposed) for the LTLW, Former Big O Tires, and Former Norma's Cleaners Sites, at 3.

²⁸⁵ Regional Board. 28 July 2022. *Request For Technical Reports, Laboratory Data and Comment Period Extension for Proposed Cleanup and Abatement Orders: Lake Tahoe Laundry Works, Big O Tires, and Former Norma's Cleaners, South Lake Tahoe, El Dorado County*, at 1.

²⁸⁶ Proposed Order at 22 ¶ 3.f.

²⁸⁷ *Id.*

²⁸⁸ *Id.*, at 23 ¶ 4.

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The Regional Board's 5-Year and 25-Year Cost Estimate scenarios assume 69 monitoring wells will comprise the monitoring well network required by Task 4. The network would consist of the existing 18 on/off-Site wells that are currently sampled pursuant to the 2017 CAO, 9 sentry wells that were constructed as part of the SCAP Regional PCE Plume Investigation, and 42 new perimeter and sentry wells that the Regional Board contemplates would be installed under the Proposed Order.

The Regional Board does not explain why it believes a monitoring well network on the order of 69 wells is indicated. The seven-step DQO process discussed in Section 9.1 should be followed to develop the MWIWP, which begins with the identification of monitoring objectives that are directly related to the expected outcome of the site activity.²⁸⁹ For example, if the Regional Board does not pursue investigation and remediation of off-Site sources in a timely fashion, then wellhead treatment is the viable remedy for continued use of groundwater as a potable supply. Given the mature nature of the Regional PCE Contamination, wellhead treatment is not sensitive to minor concentration changes at the peripheries of the contamination. Consequently, the extensive monitoring well network assumed by the Regional Board would not be needed. U.S. EPA and the U.S. Army Corps of Engineers (USACE) state "[d]esigning an effective long-term groundwater monitoring program involves locating monitoring points and developing a site-specific strategy for groundwater sampling and analysis in order to maximize the amount of information obtained to effectively address the temporal and spatial objectives of monitoring, while minimizing incremental costs."²⁹⁰

While the Regional Board's cost estimates do reflect a decrease in the sampling frequency from quarterly to semi-annually after a certain length of time, the Proposed Order should reflect that a well-designed monitoring program will evolve in other ways. Approaches to the design, evaluation, and optimization of effective groundwater monitoring programs must acknowledge and account for the dynamic nature of groundwater systems.²⁹¹ Both the temporal and spatial characteristics of a groundwater monitoring program must be assessed periodically. For example, there may be some cases where continuing to sample a monitoring well serves no useful purpose. In a study of groundwater monitoring optimization techniques for U.S. EPA, Parsons Corporation (Parsons) states a "monitoring well having a history of contaminant concentrations below detection limits may be providing little or no useful information."²⁹²

²⁸⁹ U.S. EPA. January 2004. Guidance for Monitoring at Hazardous Waste Sites: Framework for Monitoring Plan Development and Implementation. OSWER Directive No. 9355.4-28, at 1-1.

²⁹⁰ U.S. EPA and USACE. May 2005. *Roadmap to Long-Term Monitoring Optimization*. EPA 542-R-05-003, at 7.

²⁹¹ U.S. EPA. September 2004. *Demonstration of Two Long-Term Groundwater Monitoring Optimization Approaches*. Office of Solid Waste and Emergency Response. EPA 542-R-04-001b, at 8.

²⁹² Parsons. May 2003. Appendix D, Three-Tiered Groundwater Monitoring Network, Optimization Evaluation for Long Prairie Ground Water Contamination Superfund Site, Minnesota. Draft Final. Prepared for U.S. EPA, at 5-4. In U.S. EPA (2004). *supra* n. 291.

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The Proposed Order should be revised to make clear that the MWIWP will establish criteria for revising the monitoring program as it evolves.

Like most tasks prescribed in the Proposed Order, the MWIWP cannot be prepared in accordance with the schedule presented in Attachment C. The Proposed Order requires the MWIWP to be submitted to the Regional Board within two months after the Proposed Order has been adopted. Yet, the Proposed Order requires the MWIWP to “[f]ully evaluate available groundwater and lithological data generated from the SIWP(s).”²⁹³ Investigations described in the SIWP would not be finished within two months of Order adoption because Attachment C states Site Investigations shall be completed within six months of Order adoption. Further, as discussed in Section 9.8, the Order deadline for completing Site Investigations may not be achievable depending on the scope of work to be performed, the time required for the Regional Board to review and approve the SIWP(s), the ability to secure site access and necessary permits, and weather conditions at the time of planned field work.

9.5 Vapor Intrusion Investigation Work Plan

The Proposed Order requires development, submittal, and implementation of a Vapor Intrusion Investigation Work Plan. Paragraphs 36 and 37 of the Proposed Order indicate that soil gas samples have been collected from on-Site SVE wells since 2010 and PCE concentrations in soil gas exceed the ESL developed by the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) for commercial use of 67 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).²⁹⁴ The Proposed Order further states that additional investigations are required delineate the extent of PCE in soil gas originating at the Site as well as from off-Site areas such as Tucker Basin. A review of the on-Site soil gas sampling conducted over the last four quarters (Second Quarter 2021 through First Quarter 2022) indicates that the soil vapor probes with PCE concentrations greater than the commercial ESL are located in the parking lot north of the building and are bound by soil vapor probes with concentrations less than the commercial ESL.²⁹⁵ The lateral extent of PCE-impacted soil gas is defined on the LTLW and further off-Site investigation is not required.

²⁹³ *Id.*, at 23 ¶ 4.a.

²⁹⁴ SFRWQCB. 2019. ESL Workbook. Revision 2, at Table SG-1.

²⁹⁵ PES. 15 September 2021. Second Quarter 2021 Monitoring Report, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; PES. 15 December 2021. Third Quarter 2021 Monitoring Report, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; PES. 15 March 2022. Fourth Quarter 2021 Monitoring Report, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; PES (2022). *supra* n. 83.

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In December 2015, indoor air sampling was conducted at LTLW tenant spaces at 1022, 1024, and 1026 Lake Tahoe Boulevard and 1032 Emerald Bay Road.²⁹⁶ The indoor air sampling was conducted on a voluntary basis by Seven Springs to assess concentrations of VOCs in indoor air and ensure no unacceptable conditions are present. PCE in the samples ranged from not being measured above the laboratory analytical method reporting limit of 0.0678 $\mu\text{g}/\text{m}^3$ to a maximum detected concentration of 0.514 $\mu\text{g}/\text{m}^3$. These concentrations are less than the indoor air ESL of 2 $\mu\text{g}/\text{m}^3$ for commercial use²⁹⁷ and confirm conditions are acceptable within tenant spaces at the LTLW. In 2022, Seven Springs submitted a Revised Indoor Air Sampling Work Plan to conduct additional indoor air sampling at the Site on a voluntary basis.²⁹⁸ Additional indoor air sampling will be conducted in warm months to evaluate temporal variability.

In 2001, PCE was measured at 720 $\mu\text{g}/\text{L}$ in shallow zone groundwater sample collected from borehole B-2 completed on the Big O Tires site.²⁹⁹ In 2020, an investigation of the Big O Tires site determined storm drain pipelines on the property discharged to Tucker Basin.³⁰⁰ Passive soil gas sample PSG-1 was placed upgradient of borehole B-2 at a drop inlet to the storm drain pipelines. A PCE mass of 510 nanograms was measured in PSG-1. The groundwater and soil gas data indicate potential PCE transport and release to Tucker Basin.³⁰¹ The Regional Board agrees PCE from the Big O Tires site was discharged to Tucker Basin.³⁰² As a consequence, the requirement to investigate Tucker Basin as well as delineate the lateral extent of PCE-impacted soil gas should be directed to the responsible parties of the former Big O Tires site.

The lateral extent of PCE-impacted soil gas is defined on the LTLW and further off-Site investigation is not required. Therefore, development, submittal, and implementation of a Vapor Intrusion Investigation Work Plan is not appropriate. VI impacts that are related to other sources of PCE should be assessed by the appropriate responsible parties. The origin of the PCE in groundwater resulting in potential VI impacts should be determined based on investigations of the potential source properties and off-Site investigations to determine the lateral and vertical extents of the PCE.

²⁹⁶ PES. 14 January 2016. Indoor Air Sampling Report, Former Lake Tahoe Laundry Works, 1022, 1024, and 1026 Lake Tahoe Boulevard, and 1032 Emerald Bay Road, South Lake Tahoe, California (RWQCB SLIC Case No. T6S043).

²⁹⁷ SFRWQCB (2019). *supra* n. 294, at Table IA-1.

²⁹⁸ PES. 22 February 2022. Revised Indoor Air Sampling Work Plan, Former Lake Tahoe Laundry Works, 1022, 1024, and 1026 Lake Tahoe Boulevard, and 1032 Emerald Bay Road, South Lake Tahoe, California (RWQCB SLIC Case No. T6S043).

²⁹⁹ Harding ESE (2001). *supra* n. 146, at 2.

³⁰⁰ Welsh Hagen Associates. 10 November 2020. Passive Soil Gas Investigation Report, Former Big O Tires Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California.

³⁰¹ PES (2020). *supra* n. 166, at 4-5.

³⁰² Proposed Cleanup and Abatement Order for former Big O Tires facility, at 7 ¶ 20.f.

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9.6 HHRA and Ecological Risk Assessment

Task 6 of the Proposed Order allows for completion of either a screening evaluation or baseline risk assessment. A screening evaluation involves estimating risk or hazard posed by the maximum concentration of a chemical detected in each medium (soil, water, air) using an established human health risk-based screening level as a comparator.³⁰³ A baseline risk assessment is site-specific and may vary in both detail and the manner in which qualitative and quantitative analyses are used, depending on the complexity and particular circumstances of the site.³⁰⁴ The function of the baseline risk assessment is to provide an understanding of the actual and potential risks to human health and the environment related to a site so it can be determined if those risks warrant remedial action.³⁰⁵

Task 6 should be excluded from the Proposed Order because neither a human health screening evaluation nor a baseline risk assessment is required for the LTLW. In 2009, the Regional Board determined that the Site should be remediated.³⁰⁶ In 2013, the Regional Board approved soil and groundwater cleanup goals for the LTLW and use of SVE/GASS to attain those goals.³⁰⁷ After commencing SVE/GASS, PCE has been measured in soil at a maximum concentration of 0.106 mg/kg,³⁰⁸ which is less than the LTLW soil cleanup goal of 0.37 mg/kg.³⁰⁹ In addition, SVE/GASS has reduced PCE concentrations in soil gas by orders of magnitude. For example, PCE in soil vapor probe VP-2, located near the suspected PCE release location, has declined from a maximum concentration of 8,136,000 $\mu\text{g}/\text{m}^3$ to a current concentration of 88 $\mu\text{g}/\text{m}^3$.³¹⁰ As discussed in Section 9.5, PCE concentrations in indoor air samples collected from LTLW tenant spaces in 2015 were less than the indoor air ESL of 2 $\mu\text{g}/\text{m}^3$ for commercial use, which demonstrate VOCs in soil gas are not resulting in unacceptable vapor intrusion risks. MCLs are the Regional Board-approved cleanup goals for groundwater at the LTLW.

Hydrologic monitoring performed at Eloise Basin between 2003 and 2005 suggests groundwater infiltrates the basin annually during late winter to early spring.³¹¹ The subsurface region beneath a water body where conditions change from a groundwater dominated to surface water dominated system is designated the

³⁰³ DTSC. October 2015. Preliminary Endangerment Assessment Guidance Manual, at 34.

³⁰⁴ U.S. EPA. December 1989. *Risk Assessment Guidance for Superfund, Volume 1, Human Health Manual (Part A)*. Office of Emergency and Remedial Response. EPA/540/1-89/002, at 1-6.

³⁰⁵ U.S. EPA. April 22, 1991. *Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions*. Office of Solid Waste and Emergency Response. OSWER Directive 9355.0-30, at 2.

³⁰⁶ Regional Board (2009). *supra* n. 8, at 2.

³⁰⁷ Regional Board (2013). *supra* n. 15.

³⁰⁸ EKI (2019). *supra* n. 26, at 15.

³⁰⁹ E₂C (2010). *supra* n. 11, at 30.

³¹⁰ PES (2022). *supra* n. 83, at Table 4.

³¹¹ 2NDNATURE (2006). *supra* n. 117, at 46-50.

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transition zone.³¹² The locations and characteristics of transition zones and associated groundwater discharge areas vary both spatially and temporally.³¹³ Not all areas of a water body receive groundwater discharge, and even if this pathway were complete at some locations within the Tahoe Valley South Subbasin, VOC concentrations at the groundwater table are too low to cause ecological threats. The maximum PCE concentration measured in first encountered groundwater was 63.3 µg/L³¹⁴ in a sample obtained at 22 feet bgs from borehole LTLW-GW-11. This concentration is less than the ecological ESL of 120 µg/L.³¹⁵

The main objective of screening levels is to quickly enable users to distinguish which sites pose a significant threat.³¹⁶ Sites that are adequately characterized with chemical concentration data below the ESLs most likely do not pose a threat.³¹⁷ For that reason, no ecological risk assessment is needed for the Tahoe Valley South Subbasin. Task 6 should be removed from the Proposed Order.

9.7 RAP and IRAP

The Proposed Order requires preparation and implementation of an Interim Remedial Action Plan (IRAP) and a Remedial Action Plan (RAP) that are duplicative in scope and pertain to the Regional PCE Contamination instead of the localized impacts resulting from the PCE discharge at the LTLW.

9.7.1 IRAP

The IRAP required by the Proposed Order is intended to evaluate remedial actions for areas where COC concentrations are greater than relevant ESLs.³¹⁸ COCs are defined to be PCE and its degradation compounds consisting of trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2-DCE), trans-1,2-dichloroethylene (trans-1,2-DCE), 1,1-dichloroethylene (1,1-DCE), and vinyl chloride.³¹⁹ ESLs cited in the Proposed Order and Regional Board Staff Report are those developed by the SFRWQCB.³²⁰

³¹² U.S. EPA. July 2008. *Evaluating Ground-Water/Surface-Water Transition Zones in Ecological Risk Assessments*. ECO Update/ Ground Water Forum Issue Paper. Office of Solid Waste and Emergency Response. EPA-540-R-06-072, at 4.

³¹³ *Id.*

³¹⁴ Regional Board Staff Report, at Figure 13.

³¹⁵ SFRWQCB (2019). *supra* n. 294, at Table IP-6.

³¹⁶ SFRWQCB. 2019. *User's Guide: Derivation and Application of Environmental Screening Levels (ESLs)*. Interim Final (Revision 1), at 1-6.

³¹⁷ *Id.*, at 1-5.

³¹⁸ Proposed Order, at 29 ¶ 7.d.

³¹⁹ *Id.*, at 1-2 ¶ 1.

³²⁰ *Id.*, at 8 ¶ 32.g; Regional Board Staff Report, at 21-22, 26, 29-30, 47-53.

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The requirement to implement an IRAP that addresses COCs above ESLs is improper because such exceedances are not appropriate criteria for requiring remedial action. As SFRWQCB itself has recognized “the presence of a chemical at concentrations exceeding an ESL does not necessarily indicate adverse effects on human health or the environment, rather that additional evaluation is warranted.”³²¹ This is because ESLs are conservatively based on a 1×10^{-6} risk level.³²² Both U.S. EPA³²³ and DTSC³²⁴ consider a 1×10^{-6} risk level to be a point of departure for establishing cleanup goals based upon potential cancer effects. In other words, U.S. EPA and DTSC consider risks less than 1×10^{-6} to be insignificant and no further action is required. SFRWQCB states “[c]leanup goals typically are chemical concentrations for a specific site that are agreed-upon through a risk and feasibility evaluation and discussions between the overseeing regulatory agency and the discharger considering site-specific conditions.”³²⁵ Consistent with State Water Board Resolution No. 92-49 and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), the need for remedial action should not be based on ESLs, but on anthropogenic contaminant background concentrations, results of the HHRA, and compliance with applicable or relevant and appropriate requirements (e.g., MCLs).

State Water Board Resolution No. 92-49 governs remediation,³²⁶ which allows cleanup to a less stringent level if it is unreasonable to achieve MCLs.³²⁷ The Regional Board also relies on the NCP to establish groundwater cleanup levels.³²⁸ Under the NCP, U.S. EPA normally does not set cleanup goals below anthropogenic contaminant background concentrations.³²⁹ The reasons for this protocol include cost-effectiveness, technical practicability, and the potential for recontamination of remediated areas by surrounding areas with elevated anthropogenic contaminant background concentrations.³³⁰

³²¹ SFRWQCB (2019). *supra* n. 316, at ii.

³²² *Id.*, at 3-4.

³²³ U.S. EPA. 14 July 2022. *Regional Screening Levels (RSLs) — User's Guide*. <https://www.epa.gov/risk/regional-screening-levels-rsls-users-guide>. Accessed 4 August 2022.

³²⁴ DTSC. May 2022. *Human Health Risk Assessment (HHRA) Note Number 3, DTSC-modified Screening Levels (DTSC-SLs)*. Human Health and Ecological Risk Office, at 5-6.

³²⁵ SFRWQCB (2019). *supra* n 316, at 1-6.

³²⁶ Proposed Order, at 15 ¶ 60.

³²⁷ State Water Board. Resolution No. 92-49: Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304, at § III.H

³²⁸ Regional Board. 22 September 2021. *Water Quality Control Plan for the Lahontan Region*, at 4.2-4.

³²⁹ U.S. EPA. 1 May 2002. *Role of Background in the CERCLA Cleanup Program*. Office of Solid Waste and Emergency Response. OSWER 9285.6-07P, at 7.

³³⁰ *Id.*

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Rather than require an IRAP based on ESL exceedances, the appropriate step to address ESL exceedances is preparation of an HHRA. An HHRA is used to determine whether response actions such as remediation is necessary, to help provide justification for performing remedial action, and to assist in determining what exposure pathways need to be remediated.³³¹

Even if an IRAP were appropriate, the Regional Board's schedule for submitting and implementing such a plan is unreasonable. The IRAP actually entails completing five separate plans that are intended to:

- (1) Enhance contaminant mass removal and address off-Site COC migration at the LTLW.
- (2) Evaluate and destroy any vertical conduits (e.g., water supply wells and/or monitoring wells) within the Regional PCE Contamination that allow the downward migration of COCs.
- (3) Remediate COCs identified in any preferential pathways (e.g., stormwater conveyance system/Tucker Basin) located within the Regional PCE Contamination.
- (4) Mitigate any threats to human health at the Site or off-Site via the vapor intrusion to indoor air pathway.
- (5) Address any immediate threats to the beneficial use of groundwater not mitigated by implementation of the Permanent Water Replacement Plan.

The Proposed Order requires these five plans to be submitted to the Regional Board within two months of Order adoption.³³² That alone is impossible, but the Proposed Order also requires completion of no less than thirteen other tasks during the same period.

Further, the goals of the IRAP are ambiguous. For example, the "contaminant mass removal plan" is supposed to "address" off-site COC migration at the Site. The word "address" is vague and does not convey what is required. Similarly, the vertical conduit plan requires evaluation and destruction of "any" vertical conduits within the Regional PCE Contamination that "allow" the downward migration of COCs" and the preferential pathway plan requires remediation of COCs identified in "any" preferential pathways. The language of these requirements does not appear to distinguish between vertical conduits and preferential pathways that have the potential to materially impact the Regional PCE Contamination from those that do not, nor does the Proposed Order describe expected actions for those vertical conduits that are permitted in the South Y Area, such as dry wells, unlined sumps, seepage pits, and stormwater detention basins.³³³ Finally, the vapor intrusion and groundwater beneficial use plans require mitigation of "any" threats, without regard to the magnitude of the risk or the likelihood of it arising.

³³¹ 55 FR 8709; Health & Safety Code § 25356.1.5.

³³² Proposed Order, at Attachment C: Time Schedule.

³³³ Kennedy/Jenks Consultants (2014). *supra* n. 47, at Figure 6-6; Rybarski, et al. (2022). *supra* n. 117, at 86-87.

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The Proposed Order states all work associated with the IRAP be completed within two years. That requirement is particularly unreasonable given the Proposed Order requires that the IRAP scope of work be completed concurrent with site investigations that presumably would inform the scope of and implantation of the interim remedial work.³³⁴

9.7.2 RAP

The RAP serves the same function as the IRAP as these tasks are described in the Proposed Order. The IRAP is supposed to address “immediate threats” that are not mitigated by the Permanent Water Replacement Plan³³⁵ but the Proposed Order does not define the conditions that constitute such threats. The RAP also must assess the need for “interim remedial measures” and “multiple remedial measures may be needed and may be implemented to achieve all cleanup goals.”³³⁶

The Regional Board claims “[i]t is not necessary to identify all dischargers prior to proceeding with requirements for investigation and clean up and abatement”³³⁷ However, continued PCE leaching from off-Site sources makes restoration of groundwater to its beneficial uses and background quality technically and economically infeasible to accomplish. U.S. EPA guidance realizes other sites contributing to regional groundwater contamination must be addressed to enable effective remediation of the plume as a whole.³³⁸ U.S. EPA states “aquifer restoration will not be possible unless further leaching of contaminants to ground water is controlled, from both surface and subsurface sources.”³³⁹ The NRC concludes “[a]s long as the source remains, a dissolved phase plume will continue to develop; hence, removal (or isolation) of the source zone is required to halt creation of the dissolved phase plume.”³⁴⁰ CalEPA indicates that a CSM should incorporate information about each site that may be a chemical

³³⁴ The Proposed Order schedule requires submittal of a “Comprehensive Interim Remedial Action Plan” within nine months of adoption of the Proposed Order, but the text of the Proposed Order does not mention such a plan.

³³⁵ Proposed Order, at 29 ¶ 7.d.i.5.

³³⁶ *Id.*, at 30 ¶ 7.e.i.1.

³³⁷ Proposed Order, at 9 ¶ 34.

³³⁸ U.S. EPA. December 1988. *Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites*. Office of Emergency and Remedial Response. EPA/540/G-88/003, at B-1.

³³⁹ U.S. EPA. October 1996. *Presumptive Response Strategy and Ex-Situ Treatment Technologies for Contaminated Ground Water at CERCLA Sites*. Final Guidance. Office of Solid Waste and Emergency Response. EPA 540/R-96/023, at 2.

³⁴⁰ NRC (2005), *supra* n 90, at 26.

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source.³⁴¹ ASTM International likewise states the location, boundaries, and volume of each source should be measured or estimated.³⁴²

The Regional Board has not completed the crucial work of identifying off-Site sources that would be necessary if PCE is to be reduced to concentrations less than the MCL of 5 µg/L throughout the Tahoe Valley South Subbasin. The Regional Board has opted to try to shift that burden to Seven Springs and Fox by declaring LTLW is “connected” to PCE measured at concentrations greater than 500 µg/L in groundwater at the former Big O Tires facility and former Norma’s Cleaners site³⁴³ even though the Regional Board has determined PCE has been released at both properties and admits other off-Site sources likely exist in the Tahoe Valley South Subbasin.

The Regional PCE Contamination is not the responsibility of Seven Springs and Fox because the Regional PCE Contamination is due to off-Site sources. Even if it were, wellhead treatment being performed by TKPOA and LBWC already protects individuals from exposure to COCs in extracted groundwater. U.S. EPA makes clear that protectiveness of human health does not have to be achieved by reducing COCs concentrations in affected media to cleanup goals especially when such remediation is not possible:

In refining alternatives, it is important to note that protectiveness is achieved by reducing exposures to acceptable levels, but achieving these reductions in exposures may not always be possible by actually cleaning up a specific medium to these same levels. For example, ***protection of human health at a site may require that concentrations of contaminants in drinking water be reduced to levels that could not reasonably be achieved for the water supply aquifer; thus, protection could be provided by preventing exposures with the use of a wellhead treatment system.***³⁴⁴

The example cited in the above excerpt from U.S. EPA is the situation that confronts the Regional Board. Given the Regional Board’s unwillingness to pursue the sites that are responsible for the Regional PCE Contamination, leaching of PCE will sustain COC concentrations above MCLs in groundwater, making it impossible for the Regional PCE Contamination to be remediated.

³⁴¹ CalEPA. 25 June 2007. California Uniform Site Assessment Tools, at Figure 2.

³⁴² ASTM International. Standard Guide for Developing Conceptual Site Models for Contaminated Sites. Designation: E1689-20, at 4.

³⁴³ Regional Board Staff Report, at 26.

³⁴⁴ U.S. EPA. October 1988. *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*. Interim Final. Office of Emergency and Remedial Response. EPA/540/G-89/004, at 4-22 (emphasis added).

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Section 13304 of the Water Code considers wellhead treatment to be an acceptable remedy for preventing exposure to COCs in groundwater.³⁴⁵ The preferred alternative identified in STPUD's feasibility study entailed continued use of existing wellhead treatment for groundwater extracted from the Tahoe Valley South Subbasin.³⁴⁶ The Regional Board also acknowledges wellhead treatment could be the permanent water replacement plan for the Regional PCE Contamination.³⁴⁷ The remedial action requirements in the Proposed Order are not warranted because (1) no exposure to COCs in groundwater is occurring due to operation of existing wellhead treatment systems, and (2) LTLW is not the cause of the Regional PCE Contamination. If the Regional Board elects to issue the Proposed Order, then Task 7 of the Proposed Order should be limited to operating the SVE/GASS, as specified by Task 7.a.1, and preparation of a RAP that evaluates additional remedial actions to restore groundwater at the LTLW to its beneficial uses designated in the Water Quality Control Plan for the Lahontan Region.

9.8 Attachment C Time Schedule

The Proposed Order requires establishes an impossibly aggressive schedule for completing the required work. The two-month timeframe for submittal of these documents is unreasonable, especially given the fact all of following are required to be submitted to the Regional Board within two months of the Order being adopted:

- (1) Conceptual Site Model (Estimated Development Time = 3 weeks, per Attach. C)
- (2) Sampling and Analysis Plan (Estimated Development Time = 2 weeks, per Attach. C)
- (3) Quality Assurance Project Plan (Development Time included with SAP)
- (4) Site Investigation Work Plan (Estimated Development Time = 4 weeks, per Attach. C)
- (5) Monitoring Well Installation Work Plan (Estimated Development Time = 2 weeks, per Attach. C)
- (6) Vapor Intrusion Investigation Work Plan (Estimated Development Time = 2 weeks, per Attach. C)
- (7) Initial Interim Remedial Action Plan (No Estimated Development Time provided in Attach. C. Assumed by Seven Springs/Fox to be 8 weeks)

³⁴⁵ Water Code § 13304(a) ("cleanup and abatement order issued by the state board or a regional board may require the provision of, or payment for, uninterrupted replacement water service, which may include wellhead treatment . . .").

³⁴⁶ Kennedy/Jenks Consultants, Inc. 9 May 2020. *Interim Remedial Action Plan for the South Y PCE Facilities Feasibility Study*, at 1-2; Kennedy/Jenks Consultants. (2020). *supra* n. 151, at ES-4.

³⁴⁷ Proposed Order, at 14 ¶ 57, 27 ¶ 7.c.i.; Regional Board Staff Report, at 61.

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- (8) Report on Interim Emergency Water Replacement to Municipal Supply Entities (No Estimated Development Time provided in Attach. C. Assumed by Seven Springs/Fox to be 3 weeks)
- (9) Public Participation Plan (No Estimated Development Time provided in Attach. C. Assumed by Seven Springs/Fox to be 2 weeks)
- (10) Baseline Community Assessment (No Estimated Development Time provided in Attach. C. Assumed by Seven Springs/Fox to be 1 week; however, may be significantly longer if a community information gathering questionnaire is required to be mailed.)
- (11) Interested Persons Contact List (No Estimated Development Time provided in Attach. C. Assumed by Seven Springs/Fox to be 1 week)
- (12) Draft Fact Sheet (No Estimated Development Time provided in Attach. C. Assumed by Seven Springs/Fox to be 1 week)

The total estimated time to develop the aforementioned reports and planning documents is 29 weeks or approximately 7 months. However, the Regional Board is requiring these documents to be submitted **within two months** with the threat of civil liabilities/fines for failure to comply with these impossible deadlines. For perspective, SCAP funding was received by the Regional Board on 4 March 2019, but AECOM's SAP/QAPP³⁴⁸ and Regional Plume Characterization Work Plan³⁴⁹ were not finalized until June and July 2019, respectively. AECOM and the Regional Board needed four months to prepare the SAP/QAPP and Regional Plume Characterization Work Plan, **all while not having the burden of fulfilling the additional requirements and reports listed above, or a need to coordinate between multiple parties and agencies**. Therefore, the Proposed Order needs to be revised to reflect an appropriate time schedule such that tasks are suitably phased and scheduled and consistent with industry practices.³⁵⁰ Additionally, installation of monitoring wells, and performance of the Site and Vapor Intrusion Investigations are to be completed within six months of Order adoption but, under the Proposed Order's time schedule, work on these tasks cannot commence until the Regional Board approves the associated work plans.³⁵¹ Tasks

³⁴⁸ AECOM. June 2019. South Lake Tahoe "Y" PCE Plume Sampling and Analysis Plan; AECOM. June 2019. Site Cleanup Subaccount Program, California, Quality Assurance Project Plan.

³⁴⁹ AECOM. 3 July 2019. Task 3 Work Plan — South Lake Tahoe "Y" PCE Plume — Regional Plume Characterization.

³⁵⁰ This issue is not limited to initial submittals. Planning documents for site investigations, monitoring well installations, vapor intrusion investigations, and the HHRA are all due at the same time, as are Site Investigation completion reports, monitoring well installation completion reports and Vapor Intrusion Investigation completion reports. See Proposed Order, at Attachment C.

³⁵¹ For instance, if the Order is approved in October, a SIWP is timely submitted in December, and the Regional Board approves the plan in April, the proposed schedule would require Seven Springs/Fox to commence the work by June and to complete the month before, in May.

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contingent upon Regional Board's approval to start need to be revised to reflect an appropriate and reasonable schedule that is based upon when approval is given.

Another issue with the Proposed Order's schedule is that it fails to account for the fact that the Proposed Order envisions multiple rounds of plans. Task 3 refers to Site Investigation Work "Plan(s)" and Task 4 refers to Monitoring Well Installation Work "Plan(s)." However, the Proposed Order requires submittal of completion reports based on "Order adoption" and does not provide time for submittal, approval, and implementation of multiple plans.

The Schedule in Attachment C also is unreasonable insofar as it fails to account for scheduling challenges posed by the need to obtain access to properties not owned by Seven Springs or Fox and the limited field season in South Lake Tahoe. The Proposed Order ignores the access issue altogether and purports to account for seasonal issues by noting that it may grant extensions pursuant to the terms of the Proposed Order. The Regional Board has an obligation to adopt reasonable provisions, and it cannot avoid that obligation by requiring the parties named in the order to seek extensions. The Proposed Order should contain a provision that makes deadlines for field work subject to the ability to obtain reasonable site access and contractor availability. In addition, the Proposed Order should state that it does not require field work to be performed between the months of October and May when snowfall typically covers the ground surface. This timeframe coincides with the TRPA's non-Grading Season, defined to be between 15 October and 1 May of each year during which TRPA restricts construction activities.³⁵² The Regional Board should adjust any deadline for field work in the Proposed Order that falls between October and May to a reasonable deadline outside that period, and extensions due to seasonable issues may be sought as appropriate.

9.9 Monitoring and Attachment E Monitoring and Reporting Program

Page 1 of the Monitoring and Reporting Program provided in Attachment E of the Proposed Order requires collection and analysis of groundwater samples from "threatened, impacted, and impaired active water supply wells" on a quarterly basis. This requirement is based on the premise that the Regional PCE Contamination originated from the LTLW. Detected concentrations of PCE in public water system wells in the Tahoe Valley South Subbasin are not attributed to the LTLW. Therefore, the Proposed Order needs to be revised to remove the requirement for sampling off-Site public water system wells.

10 CLOSING

The Proposed Order is not needed to complete cleanup of the LTLW and should not be adopted because the LTLW has been fully characterized and effective remedial actions are in place that can be enhanced to address residual PCE in middle zone groundwater at the Site. The primary intent of the Proposed Order is to require investigation and remediation of contamination for which LTLW is not the cause. Without

³⁵² TRPA. 25 July 2022. Code of Ordinances, at § 33.3.1.A.

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access to and investigation and remediation of off-Site sources, the Proposed Order will have little to no effect on restoring groundwater within the Tahoe Valley South Subbasin to its beneficial uses because off-Site sources are sustaining the Regional PCE Contamination. If off-Site sources are not abated, then the only feasible alternative for preserving groundwater as potable supply is to treat water at the wellhead, which currently is being done.


We appreciate the Regional Board's consideration of our comments on the Proposed Order. If you have any questions or require additional information, please call Kyle Flory at (415) 798-3028 or Peter Gorman at (415) 798-3029 with PES, or Andrew Safford with EKI at (650) 292-9100.

Respectively submitted,

PES ENVIRONMENTAL, INC.


Kyle S. Flory, P.G.

EKI ENVIRONMENT & WATER, INC.


Andrew N. Safford, P.E.



Peter D. Gorman, C.H.G., P.G.

ATTACHMENTS

Table 1 - Correlations Between Perchloroethylene (PCE) "Hot Spots" In Groundwater and Suspected Off-Site Sources

Index of Exhibits to PES & EKI Comments on Proposed Lake Tahoe Laundry Works Cleanup and Abatement

TABLE 1
CORRELATIONS BETWEEN PERCHLOROETHYLENE (PCE) "HOT SPOTS" IN GROUNDWATER AND SUSPECTED OFF-SITE SOURCES

Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
CPT-E01	570	49-51	6219	Middle	Former Big O Tires	1961 Lake Tahoe Boulevard	Automobile service and repair	1975 to 2006	In a 2004 letter to the Lahontan Regional Water Quality Control Board (Regional Board), a representative for lessees CAMCO and BOT 65, Inc. disclosed that "trace amounts of PCE" were present in solvent used by these lessees. This letter also disclosed that Brakleen was handled at the property. ² Brakleen is a brake cleaning product that historically contained as much as 65 to 94 percent by weight of PCE. ³ Chlorinated solvent formulations of Brakleen may have been used by past operators of the Big O Tires franchise at the site. ⁴ An investigation conducted in 2001 discovered up to 4,700 micrograms per liter (µg/L) of PCE in middle zone groundwater beneath the former Big O Tires site. ⁵ In 2002, CAD Enterprises, the current property owner, notified former and current lessees of its intent to commence legal actions against them based upon their contribution to soil and groundwater PCE contamination at the property. ⁶ In 2019, the Regional Board issued an Investigation Order to past and current owners and operators of the former Big O Tires facility to further characterize site conditions. ⁷ The Regional Board concluded in this order that investigations performed on the Big O Tires site in 2001 and 2006 show "unauthorized discharges of petroleum and chlorinated hydrocarbons in select soil and groundwater samples from past facility operations." ⁸ In its 2022 proposed Cleanup and Abatement Order, the Regional Board finds "stormwater runoff contaminated with chlorinated hydrocarbons (e.g., PCE) and/or petroleum hydrocarbons" ⁹ from the Big O Tires facility has been discharged to the Tucker Avenue stormwater detention basin.
CPT-E01	540	58-62	6210						
LTLW-GW-9	503	42-46	6235						
LTLW-GW-11	1,680	42-46	6233						
					Runnels Automotive	986 Emerald Bay Road	Automobile service station and repair	1970 to present	According to an Environmental Data Resources, Inc. database report, a 400-gallon waste oil tank was reportedly located on-site. ¹⁰ Past auto repair operations may have included the use of PCE as a degreasing solvent. In 1997, according to the EDR report, the Regional Board required Runnels to submit a work plan to conduct a groundwater investigation on its site. One shallow zone groundwater sample was collected from the Runnels site in 1997 or 1998, which may have been in response to the Regional Board's request. Other than this one groundwater sample, no other subsurface investigations have been performed on the Runnels site for the presence of PCE.

¹ Groundwater sample data used by AECOM Technical Services, Inc. (AECOM) to generate Dissolved PCE in Groundwater Plume Map presented as Figure 8 in Proposed Order and Figure 5 in AECOM. June 2022. *Regional Plume Characterization Summary Report: South "Y" PCE Plume, 2019-2020 Field Season*.

² Strong, M. (CAMCO and BOT 65, Inc.). 29 January 2004. Letter to Harold Singer, Executive Officer, California Regional Water Quality Board, Lahontan District.

³ U.S. Department of Health & Human Services. 10 July 2007. *Household Products Database, Health & Safety Information on Household Products*, Brakleen Brake Parts Cleaner – Old Product, U.S. National Library of Medicine. Current safety data sheets show Brakleen can be as much as 90 to 100 percent PCE. See <http://docs.crcindustries.com/msds/1003714E.pdf>.

⁴ See Letter by William F. Tarantino, counsel for Seven Springs Limited Partnership, and Scott H. Reisch, counsel for Fox Capital Management Corporation to Patty Kouyoumdjian, Executive Officer, Lahontan Regional Water Quality Control Board, dated 23 August 2019, that provides comments to assist the Regional Board in its ongoing investigation of regional groundwater PCE contamination, particularly as it relates to the Big O Tires Investigation Order, dated 10 May 2019.

⁵ Harding ESE. 30 October 2001. Groundwater Investigation, Big-O Tire Center, 1961 South Lake Tahoe Blvd., South Lake Tahoe, California, at Table 1

⁶ McLaughlin, M. (Feldman & Shaw). 3 January 2002. Letter to Lessees *Re Big-O Tires Center 1961 Lake Tahoe Boulevard, South Lake Tahoe, CA APN 023-523-08*; and McLaughlin, M. (Feldman & Shaw). 17 January 2002. Letter to M. Strong and C. Harris (CAMCO) *Re Big-O Tires Center 1961 Lake Tahoe Boulevard, South Lake Tahoe, CA APN 023-523-08*.

⁷ Regional Board. 10 May 2019. Order to Submit Technical Reports in Accordance with Section 13267 of the California Water Code, Big O Tire Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, SCP Case #T6S034, GeoTracker Global ID SL0601729739.

⁸ *Id.*, at 9.

⁹ Regional Board. 16 June 2022. Proposed Cleanup and Abatement Order for former Big O Tires facility, at 7 ¶ 20.f.

¹⁰ Environmental Data Resources, Inc. 4 June 2015. *EDR Radius Map™ Report with GeoCheck®, South Y Area*.

TABLE 1
CORRELATIONS BETWEEN PERCHLOROETHYLENE (PCE) "HOT SPOTS" IN GROUNDWATER AND SUSPECTED OFF-SITE SOURCES

Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
CPT-E01 CPT-E01 LTLW-GW-9 LTLW-GW-11 (Continued)					Former Honda Motor Company automobile dealership and TCI Cablevision of California	924 Emerald Bay Road	Automobile service and repair	1975 to 1990s ¹¹	Questionnaire response submitted to Regional Board indicates that former owner, Anika and Associates, Inc, has no knowledge of chemical usage by past occupants of the site. ¹² In 1997, the only year for which data are available, Department of Toxic Substances Control (DTSC) hazardous waste generator records indicate that the Honda dealership disposed of approximately 830 pounds of an unspecified oil-containing waste. ¹³ Groundwater beneath the property is known to contain PCE. In 2001, PCE concentrations as high as 190 µg/L were detected in deeper zone groundwater at 80 feet below ground surface (bgs). ¹⁴ In 2007, the Regional Board stated its belief that the site was a potential PCE source to groundwater because "the history of site use, including auto repair, implies the past use of PCE as not being unlikely." ¹⁵ In 2011, the Regional Board closed the case without requiring further soil and groundwater investigation. ¹⁶ In closing the case, the Regional Board stated "Subsequent investigations have identified several potential upgradient PCE sources on Lake Tahoe Boulevard." ¹⁷
LTLW-J2 LTLW-J4 CPT-F01	694 718 320	35-39 35-39 41-43	6236 6239 6220	Middle	Former Norma's Cleaners	949 Emerald Bay Road	Dry cleaning	1969 to 1977 ¹⁸	PCE released at former Norma's Cleaners (i.e., Hurzel or current BevMo site) has impacted soil and groundwater beneath the property. Incomplete investigation and remediation of the site have left a subsurface PCE source that is southeast of the former site building. ¹⁹ PCE contamination at the former PCE truck parking area and possible other source locations (i.e., former dry cleaner machine, PCE delivery hallway, storm water detention basin, trash dumpster, and storm drain and sanitary sewer lines) have not been adequately delineated. In 2019, the Regional Board issued an Investigation Order to past and current owners and operators of the Hurzel site that require those entities to define the "threat and extent of remaining onsite PCE contamination." ²⁰ The 2022 proposed Cleanup and Abatement Order for Norma's Cleaner states PCE contamination leading leaching from site soil into groundwater has allowed the off-site migration of PCE in groundwater to occur. ²¹

¹¹ Emerald Bay Properties, LLC. 5 April 2019. Chemical Storage and Use Questionnaire, 924 Emerald Bay Road. Investigative Order No. R6T-2019-0087.

¹² Anika and Associates, Inc. 3 May 2019. Chemical Storage and Use Questionnaire, 924 Emerald Bay Road. Investigative Order No. R6T-2019-0086.

¹³ DTSC. 28 March 1997. EPA ID Profile, Lake Tahoe Honda Mitsubishi.

¹⁴ GHH Engineering, Inc. February 2001. Additional Assessment Report, TCI Building, 924 Emerald Bay Road, South Lake Tahoe, California, at Table 2.

¹⁵ Regional Board. 18 April 2007. TCI Building, 924 Emerald Bay Road, South Lake Tahoe, El Dorado County.

¹⁶ Regional Board. 8 February 2011. Letter to Murray Wikol. No Further Action Required for the Former TCI Building, 924 Emerald Bay Road, South Lake Tahoe, El Dorado County (SCP No. T6S017).

¹⁷ Regional Board. 7 February 2011. Case Closure Summary. Former TCI Building, at 5.

¹⁸ SECOR International Incorporated ("SECOR"). 30 May 2008. Site Investigation Report, Former Dry Cleaning Business, 949 Emerald Bay Drive, South Lake Tahoe, CA, at 1.

¹⁹ PES Environmental, Inc. 23 August 2019. Comments on Previous Site Characterization and Remediation, Hurzel Properties, LLC, 945, 949 and 961 Emerald Bay Road, South Lake Tahoe, California, Lahontan.

²⁰ Regional Board. 10 May 2019. Order to Submit Technical Reports in Accordance with Section 13267 of the California Water Code, Hurzel Properties, LLC, 961 Emerald Bay, Road, South Lake Tahoe, El Dorado County, SCP Case No. T6S044, GeoTracker Global ID SL0601790916.

²¹ Regional Board. 16 June 2022. Proposed Cleanup and Abatement Order for former Norma's Cleaners site, at 5 ¶ 13.

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CORRELATIONS BETWEEN PERCHLOROETHYLENE (PCE) "HOT SPOTS" IN GROUNDWATER AND SUSPECTED OFF-SITE SOURCES

Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
LTLW-J2 LTLW-J4 CPT-F01 (Continued)					Tahoe Mobile Auto, Dan's Auto Works, Marine Performance, German Performance, and Jean Sellars	2048 and 2050 Dunlap Drive	Automobile service and repair	Unknown	Questionnaire response submitted to Regional Board provides conflicting information regarding use of chlorinated solvents at the property. ²² One part of the questionnaire response states chlorinated solvents were used in the past while another part of the questionnaire response indicates only Stoddard solvent was employed. ²³ No chemical use records were reviewed in preparing the questionnaire response.
					Former Redwood Oil, Former Sierra Key-Lock, and Creative Fabrication	2060 Eloise Avenue	Bulk fueling	1940s to 2013 ²⁴	Questionnaire response submitted to Regional Board does not contain information regarding Redwood Oil or Sierra Key-Lock's chemical usage. Sierra Key-Lock operated a gasoline service station at the property beginning in 1969. ²⁵ Questionnaire response asserts no chemicals are used in the processes conducted at the site, but the response indicates Creative Fabrication is engaged in metal work or metal degreasing. ²⁶ Between 2005 and 2012, PCE concentrations as high as 430 µg/L were detected in ten shallow groundwater monitoring wells on and around the Redwood Oil facility. ²⁷ Redwood Oil attributed PCE in groundwater beneath its facility to migration from releases that occurred on other properties. Redwood Oil identified the probable sources as the Big O Tires, former Honda Motor Company automobile dealership, and Napa Auto Parts/Former Lakeside Automotive sites. ²⁸
					Former Berry-Hinckley Industries Bulk Terminal, and Flyers Energy LLC	2070 James Avenue	Lubricant and grease products packaging and transport; gasoline and diesel fueling operations	1940s to present ²⁹	The site is an active bulk petroleum terminal, currently operated by Flyers Energy LLC, which was formerly operated by Berry-Hinckley Industries. Flyers Energy states it stores a maximum of 100 gallons of PCE on any given day at the terminal. ³⁰ Shallow zone monitoring well MW-4, which had a screen interval between 8 and 23 feet bgs, ³¹ appears to have been the only well tested for PCE on the former Berry-Hinckley terminal. Well MW-4 contained up to 79 µg/L of PCE in 2006. ³²

²² Broughton Family Trust. 1 May 2019. Chemical Storage and Use Questionnaire, 2048 and 2050 Dunlap Drive. Investigative Order No. R6T-2019-0017.

²³ Stoddard solvent consists of petroleum hydrocarbons. Stoddard solvent is used as a paint thinner; in some types of photocopier toners, printing inks, and adhesives; as a dry-cleaning solvent; and as a general cleaner and degreaser. Agency for Toxic Substances and Disease Registry. 3 March 2011. *Stoddard Solvent*. <https://wwwn.cdc.gov/TSP/substances/ToxSubstance.aspx?toxid=73>. Accessed 13 September 2022.

²⁴ Redwood Oil bulk fueling operations took place from the 1940s to 2013. RDM Environmental Inc. 19 December 2012. *Request for "No Further Action," Former Redwood Oil Company Bulk Plant, 2060 Eloise Avenue, South Lake Tahoe, California*, at 1.

²⁵ Environmental Data Resources, Inc. 4 June 2015. EDR Radius Map™ Report with GeoCheck®, South Y Area.

²⁶ Creative Fabrication. 11 June 2019. Chemical Storage and Use Questionnaire, 2060 Eloise Avenue. Investigative Order No. R6T-2019-0054.

²⁷ RDM Environmental Inc. (2012). *supra* n. 24, at Table 1.

²⁸ *Id.*, at 3.

²⁹ Conestoga-Rovers & Associates. February 2014. Site Conceptual Model and Case Closure Request, Former Berry-Hinckley Industries Bulk Terminal (Former Chevron 1001382), 2070 James Avenue, South Lake Tahoe, California, SLIC Case T6S021, at 2.

³⁰ Flyers Energy LLC. Chemical Storage and Use Questionnaire, 2070 James Avenue. Investigative Order No. R6T-2019-0118 and attached Chemical Inventory Form and Hazardous Materials and Wastes Inventory Matrix Report.

³¹ ECM. 4 May 2005. 1st Quarter 2005 Ground Water Monitoring Report, Former Redwood Oil Company Bulk Plant, 2060 Eloise Avenue, South Lake Tahoe, California, at Table 1.

³² RDM Environmental Inc. (2012). *supra* n. 24, at Table 1.

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Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
LTLW-FIF LTLW-J5	1,040 338	45-49 35-39	6226 6238	Middle	Former Chem-Dry Carpet Cleaning of South Lake Tahoe and Custom Carpet Cleaning	941 Emerald Bay Road	Carpet cleaning	1980s to 1990s	Questionnaire response submitted to Regional Board provides information pertaining only to the Crystal Range Motel that occupied this property. ³³ However, two carpet cleaning businesses are reported to have operated on this site (i.e., Chem-Dry Carpet Cleaning and Custom Carpet Cleaning). ³⁴ No chemical use information for the carpet cleaning businesses was provided. The Regional Board collected a groundwater sample from a domestic well on this property in 1999. The groundwater sample contained 2.9 µg/L of PCE. ³⁵
					Former Beacon and Swiss Mart Gasoline service station	913 Emerald Bay Road	Retail gasoline station and convenience store; automobile service and repair	1950s to present ³⁶	Questionnaire response submitted to the Regional Board describes only current operations. Seerat, Inc., the present occupant, does not use chemicals because no automobile service and repair is conducted at the site. ³⁷ No information regarding past operations is provided. PCE has been detected in groundwater at various depths beneath or near the site. In 2003, PCE was detected at a maximum concentration of 170 µg/L in a monitoring well with a screen interval between 58 and 78 feet bgs ³⁸ PCE analysis of groundwater samples from Swiss Mart monitoring wells was a one-time event. ³⁹
					South Side Auto Body, Two Guys Automotive, and Tahoe Test and Tune	934 Eloise Avenue	Auto body repair; automobile service and repair	Unknown	Questionnaire response submitted to the Regional Board indicates that metal work or metal degreasing is being conducted and has been performed in the past at the property. ⁴⁰ However, the current operator of South Side Auto Body is uncertain whether chlorinated solvents were used by former owners of the auto body business at the site. No information on chemical usage by Two Guys Automotive and Tahoe Test and Tune is provided in the questionnaire response.
					South Side Auto Body	920 Eloise Avenue	Auto body repair	Unknown	Questionnaire response submitted to the Regional Board indicates current operator of South Side Auto Body is not certain whether chlorinated solvents were used by past owners of the auto body business. A search of U.S. EPA's Resource Conservation and Recovery Act (RCRA) database shows South Side Auto Body historically generated spent PCE as part of its operations at this site. ⁴¹

³³ Steven and Janet Leman. 29 April 2019. Chemical Storage and Use Questionnaire, 941 Eloise Avenue. Investigative Order No. R6T-2019-0089.

³⁴ Hill-Donnelly City Directory. 1992; Pacific Bell Directory. 1985.

³⁵ Regional Board. 16 April 1999. Letter to Banoo Iman, Crystal Range Motel Re Notice of Results from Drinking Water Well Sampling at Crystal Range Motel, 941 Emerald Bay Road, South Lake Tahoe, El Dorado County.

³⁶ Apex Envirotech, Inc. 6 January 1999. Site Characterization Report, Swiss Mart, 913 Emerald Bay Road, South Lake Tahoe, CA, at 4.

³⁷ Seerat, Inc. 25 April 2019. Chemical Storage and Use Questionnaire, 913 Emerald Bay Road. Investigative Order No. R6T-2019-0082.

³⁸ Black Point Environmental. 6 May 2003. First Quarter 2003 Groundwater Monitoring Report, Swiss Mart Gas Station, 913 Emerald Bay Road, South Lake Tahoe, at Table 1.

³⁹ *Id.*, at 10.

⁴⁰ South Side Auto Body. Chemical Storage and Use Questionnaire, 934 Eloise Avenue. Investigative Order No. R6T-2019-0052.

⁴¹ Environmental Data Resources, Inc. 4 June 2015. *EDR Radius Map™ Report with GeoCheck®, South Y Area.*

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CORRELATIONS BETWEEN PERCHLOROETHYLENE (PCE) "HOT SPOTS" IN GROUNDWATER AND SUSPECTED OFF-SITE SOURCES

Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
LTLW-FIF LTLW-J5 (Continued)					Liberty Utilities and Sierra Pacific Power Company	933 Eloise Avenue	Electrical distribution, utility yard, warehouse, and office	1969 to present	Review of Uniform Hazardous Waste Manifests included with questionnaire response submitted to the Regional Board shows Liberty Utilities disposes of spent PCE. ⁴² A separate questionnaire response submitted to the Regional Board also indicates Sierra Pacific Power Company used chlorinated solvents. ⁴³ DTSC hazardous waste generator records reveal Sierra Pacific Power Company disposed of approximately 67 to 375 pounds (i.e., 5 to 28 gallons) of PCE annually between 2007 and 2013, ⁴⁴ which is the period for which hazardous waste data are available on DTSC's Hazardous Waste Tracking System.
					Struve Automotive, Bill's Automotive, and Pedersen Underground-Paving Contractor	927 Eloise Avenue	Automobile service and repair	2005 to present	Questionnaire response submitted to the Regional Board states no chlorinated solvents have been used at the facility. ⁴⁵ Yet, DTSC hazardous waste generator records available for 2011 through 2018 show Struve Automotive generated approximately 117 to 325 pounds (i.e., 9 to 24 gallons) annually of PCE. ⁴⁶
					Coordinated Transit Systems, Sunshine/Yellow Taxi-Yellow Cab, and Bill's Garage	912 Eloise Avenue	Automobile service and repair	1990 to present	Questionnaire response submitted to the Regional Board states no chlorinated solvents have been used by former or current tenants. ⁴⁷ However, DTSC hazardous waste generator records show Sunshine Taxi, which has operated at the site since 1990, disposed of 250 to 500 pounds (i.e., 10 to 37 gallons) of PCE annually between 2010 and 2012. ⁴⁸
CPT-G01	120	41-43	6214	Middle	Sierra Alternators & Starters, Tahoe Generator Exchange, Woods-Baker Construction Co., and Appliance Recyclers	2108 Dunlap Drive	Repair of alternators and starters and retail sale of automobile batteries; retail sale of used washers, dryers, stoves and refrigerators	1983 to present	Questionnaire response indicates that current property owner, South Tahoe Refuse Co., is not certain whether chlorinated solvents were used at the site. ⁴⁹ Chemical Inventory Forms included with the response shows the tenant, Sierra Alternators and Starters, uses solvent and brake parts cleaner. Formulations of these products containing chlorinated solvents may have been used in the past at the site.
					South Side Auto Body, Tahoe Printing, and Rave On Builders	2116 Dunlap Drive	Auto body repair; printing	Unknown	Questionnaire response submitted to Regional Board indicates that the current property owner, South Tahoe Refuse Co., is not certain whether chlorinated solvents were used at the site. ⁵⁰ South Side Auto Body used PCE in its operations at 920 Eloise Avenue. ⁵¹ The possibility exists that PCE was used by South Side Auto Body at 2116 Dunlap Drive as well.

⁴² Liberty Utilities. 2 May 2019. Chemical Storage and Use Questionnaire, 927 Eloise Avenue. Investigative Order No. R6T-2019-0048.

⁴³ Liberty Utilities. 2 May 2019. Chemical Storage and Use Questionnaire, 927 Eloise Avenue. Investigative Order No. R6T-2019-0049.

⁴⁴ DTSC. 17 September 2019. EPA ID Profile, Sierra Pacific Power Company.

⁴⁵ Struve Automotive. 23 April 2019. Chemical Storage and Use Questionnaire, 927 Eloise Avenue. Investigative Order No. R6T-2019-0045, at 2-4.

⁴⁶ DTSC. 17 September 2019. EPA ID Profile, Struve Automotive.

⁴⁷ Zack Lannoy. 4 June 2019. Chemical Storage and Use Questionnaire, 912 Eloise Avenue. Investigative Order No. R6T-2019-0040.

⁴⁸ DTSC. 19 July 2017. EPA ID Profile, Sunshine Taxi, Inc.

⁴⁹ South Tahoe Refuse Co. 3 May 2019. Chemical Storage and Use Questionnaire, 2108 Dunlap Drive. Investigative Order No. R6T-2019-0021.

⁵⁰ South Tahoe Refuse Co. 3 May 2019. Chemical Storage and Use Questionnaire, 2116 Dunlap Drive. Investigative Order No. R6T-2019-0020.

⁵¹ See EDR (2015). *supra* n. 41.

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Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
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CPT-G01 (Continued)					South Side Auto Body and South Tahoe Refuse Co.	2132 Dunlap Drive	Auto body repair; repair and maintenance of garbage dumpsters	2000 to present ⁵²	Questionnaire response submitted to Regional Board states metal work or metal degreasing is performed at the property, but no chlorinated solvents are used in these operations. ⁵³ No information is provided on past chemical use by South Side Auto Body. South Side Auto Body used PCE in its operations at 920 Eloise Avenue. ⁵⁴ The possibility exists that PCE was used by South Side Auto Body at 2132 Dunlap Drive.
					Meyers Marine and Coast Oil Company	2140 Dunlap Drive	Unknown	Unknown	Questionnaire response submitted to Regional Board provides information on the current tenant only, which is utilizing the property for boat storage and does not involve chemicals. ⁵⁵ No information is provided on past chemical use at the property. A partial copy of a groundwater monitoring and remediation progress report ⁵⁶ included with the questionnaire indicates five monitoring wells were constructed at the site in connection with investigation and in-situ bioremediation of a petroleum hydrocarbon release. Groundwater samples do not appear to have been analyzed for chlorinated solvents.
					Art's Transmission	2105 Ruth Avenue	Transmission service and repair	1980 to present	Questionnaire response indicates no chlorinated solvents have been used at facility. However, an undated drawing in the business plan attached to the questionnaire shows the presence of two "solvent sinks" and a "cleaning machine" within the building at the facility. ⁵⁷
					Five Star Automotive and Mike's Garage	2119 Ruth Avenue	Automobile service and repair	1990 to present	Questionnaire response submitted to Regional Board states no chlorinated solvents have been used at the facility. ⁵⁸ However, this statement conflicts with DTSC hazardous waste generator records that indicate Five Star Automotive disposed of hydrocarbon solvents, which consisted of 150 pounds or roughly 11 gallons of PCE in 2007. ⁵⁹
					South Tahoe Refuse and Recycling Services	2140 Ruth Avenue	Non-hazardous solid waste transfer station and material recovery facility	1968 to present	Questionnaire response submitted to Regional Board states metal work or metal degreasing has been performed at the site. ⁶⁰ The questionnaire also indicates PCE is used in South Tahoe Refuse's operations. In addition, hazardous materials may be contained in certain non-hazardous solid wastes delivered to the facility for sorting and transfer to Lockwood Regional Landfill in Sparks, Nevada. The facility is permitted to process a maximum of 370 tons per day of municipal solid waste, green material, and construction and demolition debris. ⁶¹

⁵² Years of operation pertain to repair and maintenance of garbage dumpsters at property.

⁵³ South Tahoe Refuse Co. 3 May 2019. Chemical Storage and Use Questionnaire, 2132 Dunlap Drive. Investigative Order No. R6T-2019-0022.

⁵⁴ See EDR (2015). *supra* n. 41.

⁵⁵ Robert and Tammy Hassett. 4 May 2019. Chemical Storage and Use Questionnaire, 2140 Dunlap Drive. Investigative Order No. R6T-2019-0025.

⁵⁶ Fugro West, Inc. 5 June 1996. First Quarter 1996 Quarterly Ground Water Monitoring and Remediation Progress Report, Myers Marine, 2140 Dunlap Drive, South Lake Tahoe, California.

⁵⁷ Art's Transmission. 16 April 2019. Chemical Storage and Use Questionnaire, 2105 Ruth Avenue. Investigative Order No. R6T-2019-0186.

⁵⁸ Five Star Automotive. 29 April 2019. Chemical Storage and Use Questionnaire, 2119 Ruth Avenue. Investigative Order No. R6T-2019-0187.

⁵⁹ DTSC. 19 August 2019. EPA ID Profile, Five Star Automotive.

⁶⁰ South Tahoe Refuse Co. 3 May 2019. Chemical Storage and Use Questionnaire, 2140 Ruth Avenue. Investigative Order No. R6T-2019-0188.

⁶¹ Placer County Health and Human Services Department. 17 June 2019. South Tahoe Refuse Co., Inc. Solid Waste Facility Permit. 09-AA-0002.

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Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
CPT-G01 (Continued)					Eloise Automotive & Alignment, Sierra Automotive and Marine Specialties, Engine Dynamics Co., and Tahoe Test & Tune	2143 Eloise Avenue	Automobile service and repair	Unknown	Numerous tenants have performed auto body repair or automobile service and repair at this property. ⁶² Questionnaire response submitted to Regional Board indicates metal degreasing is currently performed by Eloise Automotive & Alignment, but no chlorinated solvents are used. ⁶³ This information conflicts with the CleanHarbors generator waste report that shows waste combustible liquids being disposed as D039 PCE RCRA hazardous waste. ⁶⁴ Further, DTSC hazardous waste generator records also show Eloise Automotive & Alignment disposed of 117 to 292 pounds (i.e., 9 to 22 gallons) of PCE annually between 2013 and 2018. ⁶⁵
					Welcome's Towing, Emerald Bay Towing, and Paal-Co, Inc. Towing	948 3 rd Street	Vehicle towing	1986 to present	Questionnaire response submitted to Regional Board states no chlorinated solvents have been used at the property. John Baker, the current property owner, did not provide chemical use records of former businesses. Welcomes Towing, the current owner, employs penetrating oil, carburetor cleaner, and brake cleaner in its present operations. ⁶⁶ Formulations of these products containing chlorinated solvents may have been used by past operators of the towing service.
SONIC10	550	123-125	6144	Deeper	Former Ted's Fix-It Shop	807 Roger Avenue	Motor and electrical equipment repair	1980s to 2012	The property is adjacent to a 7-Eleven convenience store. Based upon the investigative findings reported by URS Corporation Americas ("URS"), ⁶⁷ Regional Board concluded that a "suspected-source area" is near the 7-Eleven store. ⁶⁸ Former Ted's Fix-It Shop is a possible PCE source. Questionnaire response submitted to the Regional Board indicates chlorinated solvents were used at the property. ⁶⁹ In 2001, the only year for which data are available, DTSC hazardous waste generator records indicate Ted's Fix-It Shop generated 720 pounds of an unspecified solvent mixture. ⁷⁰ Other releases may be contributing to PCE in groundwater near the 7-Eleven store. Notes documenting conversations with long-time residents of South Lake Tahoe were transmitted to Regional Board by M. Strong. Among other PCE sources, the notes identify "R&D Petroleum up Glorene in the 7-11 area." ⁷¹

⁶² Regional Board. 22 August 2019. Summary of 13267 Site History Questionnaires as of July 26, 2019, at Table 1.

⁶³ Eloise Automotive & Alignment. Chemical Storage and Use Questionnaire, 2143 Eloise Avenue. Investigative Order No. R6T-2019-0068.

⁶⁴ CleanHarbors. 23 April 2019. Generator Waste Report.

⁶⁵ DTSC. 23 September 2019. EPA ID Profile, Eloise Automotive & Alignment.

⁶⁶ John Baker. 1 May 2019. Chemical Storage and Use Questionnaire, 948 3rd Street. Investigative Order No. R6T-2019-0014.

⁶⁷ URS. 19 January 2016. Final PCE Investigation Report, South Lake Tahoe, California.

⁶⁸ Regional Board. 2 September 2016. Meeting Summary to Discuss Next Steps for the South Y PCE Investigation.

⁶⁹ Vogel Center LLC. 1 May 2019. Chemical Storage and Use Questionnaire, 807 Roger Street. Investigative Order No. R6T-2019-0184.

⁷⁰ DTSC. 18 August 1999. EPA ID Profile, Ted's Fix-It Shop.

⁷¹ See Strong, M. and Strong, G. 14 November 2019. Email to B. Grey (Regional Board) *Re Big O Tire #65 Charges* (attachments).

TABLE 1
CORRELATIONS BETWEEN PERCHLOROETHYLENE (PCE) "HOT SPOTS" IN GROUNDWATER AND SUSPECTED OFF-SITE SOURCES

Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
SONIC10 (Continued)					Former Precision Auto Body, Welcomes Auto Body, KC's Automotive, and Bill's Garage	867 Eloise Avenue	Auto body repair; automobile service and repair	1970s to 2012	Various tenants have performed auto body repair or automobile service and repair at this property. Questionnaire response submitted to Regional Board indicates that chlorinated solvents may have been used in these operations. ⁷²
SONIC15 CPT-G06	320	71-74	6168	Deeper	Former Tahoe One Hour Cleaners and Vaya Clean Eco Dry Cleaning & Laundry	2301 Lake Tahoe Boulevard	Dry cleaning	1979 to 2018	Questionnaire response submitted to Regional Board does not provide information pertaining to use of chlorinated solvents. ⁷³ In 1997, the only year for which public data are available, DTSC hazardous waste generator records indicate Tahoe One Hour Cleaners generated 1,300 pounds of spent halogenated solvent, which likely consisted of approximately 99 gallons of PCE. ⁷⁴
	120	90-92	6149		Beacon Station No. 688, Flyers Beacon, LLC, South Tahoe Station, Inc., and Tahoe Station, Inc. service station	2304 Lake Tahoe Boulevard	Retail gasoline station and convenience store; automobile service and repair	Unknown	Questionnaire responses submitted to Regional Board states no chemicals were used by tenants operating the retail gasoline station and convenience store. ⁷⁵ No chemical use information associated with automobile service and repair conducted at the site was provided. Concrete sump was discovered during remodeling in 1993 and the site had an infiltration gallery that was used to percolate storm water runoff.
					Ed's Auto Body	2314 Lake Tahoe Boulevard	Auto body repair	Unknown	Questionnaire response submitted to Regional Board states no chlorinated solvents were used and no metal work or metal degreasing was performed at the property. ⁷⁶ However, a sample of solids collected from a floor drain inside the former auto body building contained 1,200 milligrams per kilogram ("mg/kg") of PCE. ⁷⁷ Groundwater at the site contained 4.3 µg/L of PCE. The scope and adequacy of the investigation pertaining to solvent releases at the property cannot be determined because no reports pertaining to site characterization are available on GeoTracker, which is the State Water Resources Control Board's data management system for sites that impact, or have the potential to impact, water quality in California.

⁷² Gil Construction Co. 11 April 2019. Chemical Storage and Use Questionnaire, 867 Eloise Avenue. Investigative Order No. R6T-2019-0031.

⁷³ Tahoe One Hour Cleaners. 23 July 2019. Dry Cleaner Operations Questionnaire and Chemical Storage and Use Questionnaire, 2301 Lake Tahoe Boulevard. Investigative Order No. R6T-2019-0172.

⁷⁴ DTSC. 8 October 2018. EPA ID Profile, Tahoe One Hour Cleaners.

⁷⁵ See Tahoe Station, Inc. 25 April 2019. Chemical Storage and Use Questionnaire, 2304 Lake Tahoe Boulevard. Investigative Order No. R6T-2019-0173; Tesoro Petroleum. 3 May 2019. Chemical Storage and Use Questionnaire, 2304 Lake Tahoe Boulevard. Investigative Order No. R6T-2019-0174.

⁷⁶ Tahoe Keys Corporation. 22 April 2019. Chemical Storage and Use Questionnaire, 2314 Lake Tahoe Boulevard. Investigative Order No. R6T-2019-0175.

⁷⁷ Regional Board. 15 July 2003. Case Closure Summary, Former Ed's Auto Body, 2314 Lake Tahoe Boulevard, South Lake Tahoe, at 4.

TABLE 1
CORRELATIONS BETWEEN PERCHLOROETHYLENE (PCE) "HOT SPOTS" IN GROUNDWATER AND SUSPECTED OFF-SITE SOURCES

Groundwater Sample "Hot Spot" Result Reported By AECOM ¹					Suspected Off-Site Sources Responsible for Groundwater "Hot Spot"				
Sample ID	Detected PCE Concentration (µg/L)	Depth (feet bgs)	Elevation (feet msl)	Hydrostratigraphic Unit	Off-Site Source	Site Address	Former and Current Operations	Years of Operations	Chemical Use History
SONIC15 CPT-G06 (Continued)					CSK Auto, Inc., Tires Plus, and O'Reilly Auto Parts, Grand Auto Inc., Wheel Works, Paccar Automotive, Inc., and Kelly-Moore Paint Company	2317 Lake Tahoe Boulevard	Automobile service and repair; retail automotive parts and tires sales	1979 to present	<p>Questionnaire response submitted to Regional Board states O'Reilly Auto Parts previously sold but did not use chlorinated solvents as part of its business.⁷⁸ The questionnaire response does not address past chemical use at the property. DTSC hazardous waste generator records show Wheel Works generated 42 to 240 pounds (i.e., 3 to 18 gallons) of PCE at the property annually between 2002 and 2004.⁷⁹</p> <p>An investigation and corrective action for a release of oil in service bay drains was completed in 2009.⁸⁰ However, these service bay drains were connected to the storm drain that discharged into an infiltration trench. A plumber reported the illegal connection to the Regional Board.⁸¹ Although no PCE was detected in grab groundwater samples collected at approximately 11 to 13 feet bgs in 2009,⁸² no sampling of deeper groundwater was performed, and no testing was conducted at locations where PCE was stored and managed on the facility. In 2008, trichloroethene, a possible anaerobic biotransformation compound of PCE, was detected at 2.5 µg/L in a grab groundwater sample collected at the same area of the site as the groundwater samples obtained in 2009.⁸³</p> <p>In 2012, petroleum hydrocarbons were found to have been released to soil at an oil/water separator and eight hydraulic hoists.⁸⁴ Soil samples were not analyzed for PCE. No groundwater sampling was performed.</p>

⁷⁸ Bloom Investment Company, LP. 3 May 2019. Chemical Storage and Use Questionnaire, 2317 Lake Tahoe Boulevard. Investigative Order No. R6T-2019-0177.

⁷⁹ DTSC. 25 May 2007. EPA ID Profile, Wheel Works.

⁸⁰ Regional Board. 15 September 2009. *No Further Action Required at the Former CSK Auto #4083, 2317 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, SCP Case No. T6S068.*

⁸¹ Regional Board. 18 April 2008. SLIC Release/Contamination Site Report, CSK Auto. URF Tracking Number: 5280927360.

⁸² GeoTek, Inc. 26 June 2009. Groundwater Investigation, Former CSK Auto #4083, 2317 Lake Tahoe Boulevard, South Lake Tahoe, California.

⁸³ *Id.*

⁸⁴ McGinley & Associates. 19 October 2012. Results of Assessment and Remediation Activities, O'Reilly Auto Parts, 2317 Lake Tahoe Boulevard, South Lake Tahoe.

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Exhibit Number	Description
1.	PES. 17 November 2003. <i>Groundwater Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
2.	PES. 13 October 2004. <i>Supplemental Site Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
3.	PES. 27 May 2005. <i>Additional Site Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
4.	PES. 31 January 2006. <i>Additional Soil Investigation Results, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, RWQCB SLIC CASE No. T6S043</i>
5.	Regional Board. 12 May 2017. <i>Cleanup and Abatement Order (CAO) R6T 2017 0022 Requiring Remediation and Additional Investigation of PCE Groundwater Contamination, Lake Tahoe Laundry Works, South Lake Tahoe, California, Site Cleanup Program Case T6S043</i>
6.	Regional Board. 18 April 2006. <i>Order for Corrective Action Workplan, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County</i>
7.	Regional Board. 8 April 2009. <i>Investigative Order No. RGT-2009-0013 to Submit Workplan for Remediation at the Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County</i>
8.	Letter from Regional Board to S. Reisch (counsel for Fox) and B. Beard (counsel for Seven Springs) 1 September 2009. <i>Acceptance of Interim Remedial Action Workplan and Addendum, Lake Tahoe Laundry Works</i>
9.	Environmental Engineering, Consulting and Remediation, Inc. (E ₂ C). 4 June 2009. <i>Interim Remedial Action Workplan for SZA Groundwater Investigation, SZA Groundwater Monitoring, Interim Remedial Action Vadose Zone Soil and Shallow Groundwater Cleanup, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe</i>
10.	E ₂ C. 12 August 2010. <i>Interim Remedial System Installation/Pilot Testing Report of Findings and Draft Remedial Action Plan for Vadose Zone Soil and Shallow Groundwater Cleanup, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
11.	Regional Board. 15 June 2015. <i>Notification of Stipulated Agreement for Replacement Water Supply at 883 and 903 Eloise Avenue, South Lake Tahoe</i>
12.	Regional Board. 17 February 2016. <i>Satisfaction of Stipulated Agreement for Replacement Drinking Water — Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County</i>

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13.	PES. 28 September 2018. <i>Preferential Pathway Evaluation Work Plan, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
14.	B. Grey (Regional Board). 16 October 2018. Email to Working Parties and Regional Board staff. Re <i>Comments on Weekly Progress Reports, Preferential Pathway Evaluation Work Plan and Revised Preliminary Planning Report</i>
15.	EKI. 19 March 2018. <i>Amended Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
16.	EKI. 4 October 2019. <i>Investigation Summary Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
17.	EKI. 1 April 2019. <i>Investigation Summary Report, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
18.	PES. 15 November 2018. <i>Request for Site Access, 1961 Lake Tahoe Boulevard APN 023 523 08 100, South Lake Tahoe, California</i>
19.	PES. 13 December 2018. <i>Follow-Up on Request for Site Access, 1961 Lake Tahoe Boulevard APN 023 523 08 100, South Lake Tahoe, California</i>
20.	PES. 14 January 2019. <i>Request for Assistance with Access, Former Big O Tires Store, 1961 Lake Tahoe Boulevard APN 023 523 08 100, South Lake Tahoe, California</i>
21.	PES and EKI. 15 January 2019. <i>Groundwater Investigation Planning and Progress Report No. 13, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
22.	Regional Board. 13 March 2019. <i>Lahontan Water Board Receives \$4.6 Million Grant to Investigate Perchloroethylene (PCE) Contamination in South Lake Tahoe's Groundwater. Media Release</i>
23.	AECOM Technical Services, Inc. (AECOM). June 2022. <i>Regional Plume Characterization Summary Report: South "Y" PCE Plume, 2019 2020 Field Season</i>
24.	STPUD. 2021. <i>Who We Are</i>
25.	Regional Board. 22 August 2005. <i>Staff Report, Solvent Contamination at the Big O Tires Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe</i>
26.	STPUD. 23 November 2016. <i>Feasibility Study of Remedial Alternatives to Mitigate PCE Contamination. Proposition 1 Groundwater Grant Program Planning Final Application</i>

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27.	Kennedy/Jenks Consultants. 22 December 2014. <i>Tahoe Valley South Basin (6-5.01) 2014 Groundwater Management Plan</i>
28.	Regional Board. 20 August 1997. <i>Agency Agreement to Support the Tahoe South “Y” PCE Investigation, at 1; Regional Board</i>
29.	Regional Board. September 1997. <i>Status Report on the “Y” Investigation in South Lake Tahoe</i>
30.	Regional Board. 25 February 1999. <i>Summary of PCE Investigations, South Lake Tahoe. FY 1997/98</i>
31.	Regional Board. 15 July 1998. <i>Campora Gas Property, 1640 Shop Street, South Lake Tahoe</i>
32.	STPUD. 20 August 1998. Letter to Regional Board regarding plugged sanitary sewer pipeline
33.	Regional Board. 17 July 1998. <i>STAGE Bus Property, 1680 Shop Street, South Lake Tahoe (El Dorado County) APN 032 312-02</i>
34.	Phase Three Environmental Management. 8 February 1999. <i>Groundwater Investigation, STAGE Bus Facility — Shop Street, South Lake Tahoe, California</i>
35.	Regional Board. 4 March 1999. <i>No Further Action at the STAGE Bus Properties, Shop Street, South Lake Tahoe, El Dorado County</i>
36.	EKI. 30 August 2017. <i>Off-Site Groundwater Investigation Data Report, South Y Area, South Lake Tahoe, California</i>
37.	PES and EKI. 13 November 2018. <i>Groundwater Investigation Planning and Progress Report No. 7, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, at attached Meeting Notes</i>
38.	State Water Board. 30 March 2017. <i>South Tahoe Public Utility District Planning Grant, Groundwater Planning, Feasibility Study of Remedial Alternatives to Mitigate Tetrachloroethylene Contamination. Agreement No. D1712508</i>
39.	Shop Street/Industrial Avenue area included as Attachment A to PES and EKI. 11 January 2018. <i>Responses to Comments Regarding Revised Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California</i>
40.	Regional Board. 10 May 2019. <i>Order to Submit Technical Reports in Accordance with Section 13267 of the California Water Code, Big O Tire Store, 1961 Lake Tahoe Boulevard,</i>

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Exhibit Number	Description
	South Lake Tahoe, El Dorado County, SCP Case #T6S034, Geotracker Global ID SL0601729739
41.	Regional Board. 5 January 1996. Tahoe South Y PCE Investigation
42.	SECOR International Incorporated. 30 May 2008. <i>Site Investigation Report, Former Dry Cleaning Business, 949 Emerald Bay Drive, South Lake Tahoe, CA 96150</i>
43.	PES. 23 August 2019. <i>Comments on Previous Site Characterization and Remediation, Hurzel Properties, LLC., 945, 949, and 961 Emerald Bay Road, South Lake Tahoe, California</i>
44.	Regional Board. 10 May 2019. Order to Submit Technical Report in Accordance with Section 13267 of the California Water Code, Hurzel Properties, LLC, 961 Emerald Bay Road, South Lake Tahoe, El Dorado County, SCP Case No. T6S044, GeoTracker Global ID SL0601790916
45.	Austin, T. (State Water Board) 15 July 2020. Email to A. Giorgianni (Rodriguez Wright LLP) <i>Re 961 Emerald Bay (Trestle South Tahoe LLC)</i>
46.	URS. 19 January 2016. <i>Final PCE Investigation Report, South Lake Tahoe, California</i>
47.	Regional Board. 27 February 2020. <i>South Y PCE Technical Meeting Notes</i>
48.	U.S. EPA. September 2017. <i>Best Practices for Environmental Site Management: A Practical Guide for Applying Environmental Sequence Stratigraphy to Improve Conceptual Site Models</i> . National Risk Management Research Laboratory. EPA/600/R 17/293
49.	Hadley, P. and Newell, C. 2014. <i>The New Potential for Understanding Groundwater Contaminant Transport</i> . Groundwater. Vol. 52. No. 2
50.	PES. 15 June 2022. <i>First Quarter 2022 Monitoring Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe Boulevard, South Lake Tahoe, California</i>
51.	DTSC. June 2012. <i>Guidelines for Planning and Implementing Groundwater Characterization of Contaminated Sites</i>
52.	PES and EKI. 20 February 2020. Response to Weiss Associates Letter Regarding South Y Basin Aquifer PCE South Lake Tahoe, California
53.	EKI. 3 April 2020. Investigation Summary Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California

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54.	PES. 16 April 2020. Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRATP) and South Y PCE Facilities Feasibility Study (FS), South Lake Tahoe, California
55.	U.S. EPA. 21 April 1999. Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites. Office of Emergency and Remedial Response. Directive 9200.4 17P
56.	NRC. 2005. Contaminants in the Subsurface: Source Zone Assessment and Remediation. National Academies Press, Washington DC
57.	U.S. EPA. January 1992. Estimating Potential for Occurrence of DNAPL at Superfund Sites. Office of Solid Waste and Emergency Response. Publication: 9355.4 07FS
58.	U.S. Department of Defense Strategic Environmental Research and Development Program (SERDP) and U.S. Department of Defense Environmental Security Technology Certification Program (ESTCP). 2014. Chlorinated Solvent Source Zone Remediation
59.	ESTCP. March 2011. A Guide for Selecting Remedies for Subsurface Releases of Chlorinated Solvents. Decision Guide. ESTCP Project ER 200530
60.	STPUD. 12 November 2002. Local Groundwater Assistance Grant Application for the Development of Groundwater Resources in the Presence of Contaminant Plumes, South Lake Tahoe, California
61.	Grey, B. (Regional Board) 29 October 2018. Email to Working Parties Re Comments on Weekly Planning and Progress Reports with Request for Face to Face Technical Meeting
62.	U.S. EPA. September 1990. Handbook, Ground Water, Volume 1: Ground Water and Contamination. Office of Research and Development. EPA/625/6 90/016a
63.	Hogan Lovells US LLP (counsel for Fox). 8 September 2016. Response to Revised Cleanup and Abatement Order for Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California
64.	PES and EKI. 14 May 2021. Response to Weiss Associates Comments Regarding South Y Basin Aquifer PCE South Lake Tahoe, California
65.	Siegel, D. 2008. Reductionist Hydrogeology: Ten Fundamental Principles. Hydrological Processes. Vol. 22
66.	State Water Board. 20 July 2016. Meeting Summary — Lake Tahoe Laundry Works
67.	STPUD. 25 October 2016. 2016 GWMP Stakeholder Advisory Group Minutes

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68.	Regional Board. 2 September 2016. Meeting Summary to Discuss Next Steps for the South Y PCE Investigation
69.	L. Dernbach. (Regional Board). 20 July 2016. Email to T. Carter. (State Water Board). Re Call to Lahontan RWQCB — South Lake Tahoe — Former Lake Tahoe Laundry Works (NEW TELECON #)
70.	L. Dernbach (Regional Board). 22 September 2016. Email to Carter, T. (State Water Board). Re STPUD
71.	2NDNATURE. 17 March 2006. Detention Basin Treatment of Hydrocarbon Compounds in Urban Stormwater. Final Report
72.	Rybarski, S., M. Hausner, and Bergsohn, I. 22 April 2022. Alternative Plan for Tahoe Valley South Subbasin (6 005.01), First Five Year Update. Volume I
73.	U.S. EPA. September 1993. Data Quality Objectives Process for Superfund. Interim Final Guidance. Office of Emergency and Remedial Response. EPA540 R 93 071
74.	L. Dernbach (Regional Board). 16 November 2004. Email to Singer, H. (Regional Board) Re PCE at Y
75.	Regional Board. 7 March 2006. Amended Cleanup and Abatement Order No. 6T 2003 031A1, Big O Tires Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County
76.	E ₂ C. 2 June 2017. Second Quarter 2017 Groundwater Monitoring Report and Current Site Remediation Status Report, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California
77.	Regional Board. 4 January 2017. Request for Supplemental Work Plan to Perform Batch Pumping, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County
78.	Regional Board. 16 May 2016. Comments on Air Sparge Performance Test, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe
79.	.. 27 July 2016. Response to Comments on Air Sparge Performance Test, Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California
80.	PES and EKI. 4 April 2017. Lake Tahoe Laundry Works
81.	ITRC. April 2008. Enhanced Attenuation: Chlorinated Organics. Technical and Regulatory Guidance

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82.	ITRC. August 2010. Use and Measurement of Mass Flux and Mass Discharge
83.	Harding (ESE). 30 October 2001. Groundwater Investigation, Big-O Tire Center, 1961 South Lake Tahoe Boulevard, South Lake Tahoe, California
84.	Kennedy/Jenks Consultants, Inc. 10 May 2020. South Y PCE Facilities Feasibility Study
85.	STPUD. 12 June 2020. Responsiveness Summary for Item 12 Interim Remedial Action Plan. Feasibility Study of Remedial Alternatives to Mitigate Tetrachloroethylene Contamination
86.	EKI. 24 April 2020. Transmittal of Calculations Regarding Perchloroethylene Mass in Groundwater Within South Y Area, South Lake Tahoe, California included as attachment to Seven Springs and Fox. 24 April 2020. Supplemental Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS), South Lake Tahoe, California
87.	Regional Board. 12 December 2005. Comments on Draft Amended Cleanup and Abatement Order (CAO) No. R6T 2003 031A1 for the Big O Tires Store, South Lake Tahoe
88.	William F. Pillsbury, Inc. October 1978. Tahoe Valley Drainage Basin, Drainage Study
89.	Kerfoot, H. 1990. Soil Gas Surveys for Detection and Delineation of Groundwater Contamination. Trends in Analytical Chemistry. Vol. 9. No. 5.
90.	PES. 19 October 2004. Comments on Preliminary Workplan for Additional Investigation of Chlorinated Solvents, Big O Tire Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California
91.	PES. 10 July 2007. Comments on Soil and Groundwater Investigations at the Big O Tire Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California
92.	EKI. 3 December 2015. Response to Water Board Notification of Consideration of No Further Action; Former Big O Tires Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California
93.	PES. 15 December 2020. Comments on Passive Soil Gas Investigation Report, Former Big O Tires Store Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California
94.	Flory, K. (PES) 27 August 2021. Email to Grey, B. (Regional Board) Re Former Big O Tire Site – Comments on Revised Phase 2 Work Plan dated July 26, 2021 (identifying PCE release locations on the downgradient former Big O Tires facility)
95.	EKI. 1 October 2020. Investigation Summary Report, Former Lake Tahoe Laundry Works, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California

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96.	Prakash, O. and Datta, B. 2013. Sequential Optimal Monitoring Network Design and Iterative Spatial Estimation of Pollutant Concentration for Identification of Unknown Groundwater Pollution Source Locations. Environmental Monitoring and Assessment
97.	Lu, J. 2015. Chapter 6, Identification of Forensic Information from Existing Conventional Site Investigation Data, at 156. In Introduction to Environmental Forensics. 3rd Ed. Elsevier Ltd.
98.	Attachment 1 to Regional Board. 22 August 2019. Memorandum Re Summary of 13267 Site History Questionnaire as of July 26, 2019
99.	Regional Board. 3 October 2001. Letter to Gerald and Ann Johnson, Tahoe Supply Company, and TWGW Inc. Notice to Submit Workplan for Investigation at 1931 and 1935 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County (APN 023-351-18)
100.	DTSC. 15 October 2018 EPA ID Profile, High Sierra Co. Inc. dba Ken’s Tire Center
101.	DTSC. 23 October 2003. EPA ID Profile, High Sierra, Inc.
102.	U.S. EPA. 1984. Composition and Management of Used Oil Generated in the United States. Office of Solid Waste and Emergency Response. EPA/530-SW-013
103.	Strong, Mark A. 24 February 2020. Chemical Storage and Use Questionnaire, 1961 Lake Tahoe Boulevard; and Letter by W. Tarantino and S. Reisch, to P. Kouyoumdjian, Executive Officer, Lahontan Regional Water Quality Control Board, dated 23 August 2019, that provides comments to assist the Regional Board in its ongoing investigation of regional groundwater PCE contamination, particularly as it relates to the Big O Tires Investigation Order
104.	STPUD. 29 March 2021. Tahoe Valley South Subbasin (6 005.01) Annual Report, 2020 Water Year
105.	CDHS. January 2000. Drinking Water Source Assessment and Protection (DWSAP) Program. Revision 2
106.	Regional Board. 8 July 2003. Notice to Submit Workplan for PCE Source Investigation at 949 Emerald Bay Road, South Lake Tahoe, El Dorado County
107.	Regional Board. 24 July 2007. Denial of No Further Action Request, Big O Tires Store, 1961 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County — Cleanup and Abatement Order No. R6T 2003 031A1
108.	EKI. 16 November 2021. Comments on AECOM Soil Gas Investigation Work Plan, South “Y” PCE Plume, South Lake Tahoe, California

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109.	CalEPA. February 2020. Supplemental Guidance: Screening and Evaluating Vapor Intrusion. Draft for Public Comments
110.	P. Gorman (PES). 3 November 2020. Email to B. Grey (Regional Board) Re Comments on RMC's Investigation Work Plan for Hurzel Properties LLC (SL0601790916)
111.	PES. 22 December 2020. Comments on Investigation Work Plan, Hurzel Properties, LLC., 945, 949, and 961 Emerald Bay Road, South Lake Tahoe, California
112.	PES. 14 May 2021 Comments on RMC Geoscience, Inc. Soil Vapor Probe Investigation Report, Hurzel Properties, LLC., 945, 949, and 961 Emerald Bay Road, South Lake Tahoe, California
113.	P. Gorman (PES). 14 October 2021. Email to B. Grey (Regional Board) Re Hurzel Site — PES Comments
114.	Gorman, P. (PES) 1 December 2021. Email to Grey, B. (Regional Board) Re Hurzel Site — PES Comments on RMC's Phase 2 Work Plan
115.	Cazier, A. (Regional Board). 10 December 2021. Email to Stakeholders Re SCAP Regional PCE Plume Investigation Project Update: Preliminary Sentry Well Groundwater Sampling Results, at Enclosure 2 Draft Figure 1 Sentry_Well_Site_Map_Event1 Concentrations
116.	Kennedy/Jenks Consultants. 2 January 2019. Human Health Risk Assessment for South Y Groundwater
117.	Allegro Communication Consulting. 2018. TVS Groundwater Basin Survey of Well Owners
118.	U.S. Department of Energy. February 2013. Soil Vapor Extraction System Optimization, Transition, and Closure Guidance. PNNL 21843. RPT DVZ AFRI 006. Pacific Northwest National Laboratory
119.	U.S. EPA. February 2018. Engineering Issue: Soil Vapor Extraction (SVE) Technology. Office of Research and Development, National Risk Management Research Laboratory, Land and Materials Management Division. EPA/600/R-18/053
120.	PES. 12 August 2021. Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, California
121.	Regional Board. 16 November 2021. Notice of Deficient Workplan, August 12, 2021 Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043

**Index of Exhibits to PES & EKI Comments on Proposed
Lake Tahoe Laundry Works Cleanup and Abatement**

Exhibit Number	Description
122.	Regional Board. 1 December 2021. Updated Notice of Deficient Workplan, August 12, 2021 Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043
123.	Morrison Foerster 20 December 2021. Notice of Deficient Workplan, August 12, 2021 Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043, dated November 16, 2021, and Updated Notice of Deficient Workplan, August 12, 2021 Remediation Evaluation Workplan for Chlorinated Volatile Organic Compounds in Middle Zone Groundwater, Lake Tahoe Laundry Works (LTLW), 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043, dated December 1, 2021
124.	T. Austin (State Water Board). 1 February 2022. Email to W. Tarantino (Morrison Foerster) Re Request for Meeting — Remediation at the Lake Tahoe Laundry Works Site and the Tahoe Valley South Basin
125.	U.S. EPA. January 2000. Data Quality Objectives Process for Hazardous Waste Site Investigations, EPA QA/G 4HW. Final. Office of Environmental Information. EPA/600/R00/007
126.	U.S. EPA. February 2006. Guidance on Systematic Planning Using the Data Quality Objectives Process, EPA QA/G 4. Office of Environmental Information. EPA/240/B 06/001
127.	U.S. EPA. March 2005. Uniform Federal Policy for Quality Assurance Project Plans, Evaluating, Assessing, and Documenting Environmental Data Collection and Use Programs, Part 1: UFP QAPP Manual. Final. Version 1. Intergovernmental Data Quality Task Force. EPA 505 B-04 900A
128.	EKI. 26 July 2017a. Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California; EKI. 11 September 2017b. Revised Groundwater Investigation Work Plan, Former Lake Tahoe Laundry Works Site, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California
129.	Ground Zero Analysis, Inc. 27 September 2017. Comments on the September 11, 2017 EKI Revised Groundwater Investigation Workplan. Prepared for Tahoe Keys Property Owners Association
130.	Morgan et al. 2008. Glacio-Lacustrine Stratigraphy, Aquifer Characterization and Contaminant Transport: A Case Study in South Lake Tahoe, California, USA. Hydrogeology Journal. Vol. 16

**Index of Exhibits to PES & EKI Comments on Proposed
Lake Tahoe Laundry Works Cleanup and Abatement**

Exhibit Number	Description
131.	2NDNATURE. August 2011. Synthesis of Existing Information, Infiltration BMP Design & Maintenance Study. Final
132.	Regional Board. 22 August 2018. Conditional Acceptance of March 19, 2018, Amended Groundwater Investigation Work Plan, Lake Tahoe Laundry Works (LTLW), South Lake Tahoe, El Dorado County, Site Cleanup Program Case No. T6S043
133.	AECOM. 5 October 2021. Soil Gas Investigation Work Plan, South “Y” PCE Plume South Lake Tahoe, California
134.	Cazier, A. (Regional Board) 13 June 2022. Email to Stakeholders Re SCAP Regional PCE Plume Investigation Project Update
135.	Morrison Foerster (counsel for Seven Springs). 25 July 2022. Request for Comments — Cleanup and Abatement Orders R6T 2022 (Proposed) for the LTLW, Former Big O Tires, and Former Norma’s Cleaners Sites
136.	Regional Board 28 July 2022. Request For Technical Reports, Laboratory Data and Comment Period Extension for Proposed Cleanup and Abatement Orders: Lake Tahoe Laundry Works, Big O Tires, and Former Norma’s Cleaners, South Lake Tahoe, El Dorado County
137.	U.S. EPA. January 2004. <i>Guidance for Monitoring at Hazardous Waste Sites: Framework for Monitoring Plan Development and Implementation. OSWER Directive No. 9355.4 28</i>
138.	U.S. EPA and USACE. May 2005. <i>Roadmap to Long Term Monitoring Optimization. EPA 542 R 05 003</i>
139.	U.S. EPA. September 2004. <i>Demonstration of Two Long Term Groundwater Monitoring Optimization Approaches. Office of Solid Waste and Emergency Response. EPA 542 R 04 001b</i>
140.	Parsons. May 2003. Three Tiered Groundwater Monitoring Network, Optimization Evaluation for Long Prairie Ground Water Contamination Superfund Site, Minnesota. Draft Final
141.	SFRWQCB. 2019. ESL Workbook. Revision 2
142.	PES 15 September 2021. Second Quarter 2021 Monitoring Report, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California
143.	PES. 15 December 2021. Third Quarter 2021 Monitoring Report, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California

**Index of Exhibits to PES & EKI Comments on Proposed
Lake Tahoe Laundry Works Cleanup and Abatement**

Exhibit Number	Description
144.	PES. 15 March 2022. Fourth Quarter 2021 Monitoring Report, Former Lake Tahoe Laundry Works, South Y Shopping Center, 1024 Lake Tahoe Boulevard, South Lake Tahoe, California
145.	PES. 14 January 2016. Indoor Air Sampling Report, Former Lake Tahoe Laundry Works, 1022, 1024, and 1026 Lake Tahoe Boulevard, and 1032 Emerald Bay Road, South Lake Tahoe, California (RWQCB SLIC Case No. T6S043)
146.	PES. 22 February 2022. Revised Indoor Air Sampling Work Plan, Former Lake Tahoe Laundry Works, 1022, 1024, and 1026 Lake Tahoe Boulevard, and 1032 Emerald Bay Road, South Lake Tahoe, California (RWQCB SLIC Case No. T6S043)
147.	Welsh Hagen Associates 10 November 2020. Passive Soil Gas Investigation Report, Former Big O Tires Site, 1961 Lake Tahoe Boulevard, South Lake Tahoe, California
148.	DTSC. October 2015. Preliminary Endangerment Assessment Guidance Manual
149.	U.S. EPA. December 1989. Risk Assessment Guidance for Superfund, Volume 1, Human Health Manual (Part A). Office of Emergency and Remedial Response. EPA/540/1 89/002
150.	U.S. EPA. April 22, 1991. Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions. Office of Solid Waste and Emergency Response. OSWER Directive 9355.0 30
151.	U.S. EPA. July 2008. Evaluating Ground Water/Surface Water Transition Zones in Ecological Risk Assessments. ECO Update/ Ground Water Forum Issue Paper. Office of Solid Waste and Emergency Response. EPA 540-R 06 072
152.	SFRWQCB. 2019. User's Guide: Derivation and Application of Environmental Screening Levels (ESLs). Interim Final (Revision 1)
153.	DTSC. May 2022. Human Health Risk Assessment (HHRA) Note Number 3, DTSC modified Screening Levels (DTSC SLs). Human Health and Ecological Risk Office
154.	U.S. EPA. 1 May 2002. Role of Background in the CERCLA Cleanup Program. Office of Solid Waste and Emergency Response. OSWER 9285.6-07P
155.	U.S. EPA. December 1988. Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites. Office of Emergency and Remedial Response. EPA/540/G-88/003
156.	U.S. EPA. October 1996. Presumptive Response Strategy and Ex Situ Treatment Technologies for Contaminated Ground Water at CERCLA Sites. Final Guidance. Office of Solid Waste and Emergency Response. EPA 540/R 96/023

**Index of Exhibits to PES & EKI Comments on Proposed
Lake Tahoe Laundry Works Cleanup and Abatement**

Exhibit Number	Description
157.	ASTM International. Standard Guide for Developing Conceptual Site Models for Contaminated Sites. Designation: E1689-20
158.	U.S. EPA. October 1988. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA. Interim Final. Office of Emergency and Remedial Response. EPA/540/G-89/004
159.	Kennedy/Jenks Consultants, Inc. 9 May 2020. Interim Remedial Action Plan for the South Y PCE Facilities Feasibility Study
160.	AECOM. June 2019. South Lake Tahoe “Y” PCE Plume Sampling and Analysis Plan
161.	AECOM. June 2019. Site Cleanup Subaccount Program, California, Quality Assurance Project Plan
162.	AECOM. 3 July 2019. Task 3 Work Plan — South Lake Tahoe “Y” PCE Plume — Regional Plume Characterization
163.	Index of GeoTracker pages for the Lake Tahoe Laundry Works site (Global ID No. SL0601754315), the Former Big O Tires site (Global ID No. SL0601729739), the Former Norma’s Cleaners site (Global ID No. SL0601790916), the South Y Regional Contamination (Global ID No. T10000007984), and the historical South Y PCE contamination (Global ID No. SL0601794942).

EXHIBIT C

Note: Proposed edits to the Proposed Order are tracked in the text below and comments and questions are provided in comment bubbles in the margins. These proposed edits and comments supplement Fox's Comments on the Revised Proposed Cleanup and Abatement Order, dated September 19, 2022 ("Fox's September 2022 Comments"). The absence of a proposed edit or comment in the text below does not mean that Fox agrees with the preceding statement. For the Regional Board's convenience, in some cases we have provided cross-referenced to Fox's September 2022 Comments or the associated technical comments attached as Exhibit B ("Technical Comments"), but we did not endeavor to do so in all cases where such comments are relevant.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION
CLEANUP AND ABATEMENT ORDER NO. R6T-2022-(PROPOSED)
REQUIRING

SEVEN SPRINGS LIMITED PARTNERSHIP
FOX CAPITAL MANAGEMENT CORPORATION
BOBBY PAGE'S, INC.
CONNOLLY DEVELOPMENT, INC

TO ASSESS, CLEANUP, AND ABATE

WASTE DISCHARGED TO WATERS OF THE STATE PURSUANT TO CALIFORNIA

WATER CODE SECTIONS 13267 AND 13304

LAKE TAHOE LAUNDRY WORKS
1024 LAKE TAHOE BOULEVARD
SOUTH LAKE TAHOE, CALIFORNIA 96150
AND

REGIONAL PERCHLOROETHYLENE GROUNDWATER PLUME

SITE CLEANUP PROGRAM NO. T6S043
GEOTRACKER GLOBAL ID NO. SL0601754315

This Cleanup and Abatement Order No. R6T-2022-(PROPOSED) (Order) is issued to Seven Springs Limited Partnership, Fox Capital Management Corporation, Bobby Pages, Inc., and Connolly Development, Inc., based on provisions of Water Code (WC) sections 13304 and 13267, which authorizes the California Regional Water Quality Control Board, Lahontan Region (Lahontan Water Board) to issue this Cleanup and Abatement Order and, Section 13267, which authorizes the Lahontan Water Board to require the submittal of technical and monitoring reports.

The Lahontan Water Board finds that:

OVERVIEW

1. Discharger Respondent(s): Seven Springs Limited Partnership (Seven Springs), Fox Capital Management Corporation (Fox), Bobby Page's, Inc. and Connolly Development, Inc. are identified as "Dischargers Respondents" due to their or their predecessors':

Commented [A1]: Section 13267 does not authorize the issuance of cleanup and abatement orders. See Fox's September 2022 Comments § VII.A.

Commented [A2]: The Regional Board has not alleged and there is no evidence that Fox "discharged" anything so the term "discharger" is thus inapplicable to Fox. The term "Respondent" would be more appropriate.

Commented [A3]: The original lease documents and the company's current website use an apostrophe.

Commented [A4]: To what "predecessors" does this refer? This reference is vague and ambiguous and fails to put the parties on notice of the basis of their liability.

- Current or prior ownership of the property located at 1024 Lake Tahoe Boulevard, South Lake Tahoe, California, during a time when a waste discharge occurred, and/or
- ~~Current or prior operations~~ A spill in the parking lot at the former Lake Tahoe Laundry Works resulted in the discharge of wastes, including the volatile organic compounds (VOCs) perchloroethylene (PCE), resulting in ~~and~~ PCE degradation compounds, including trichloroethylene (TCE), cis-1,2 dichloroethylene (cis-1,2 DCE), trans-1,2 dichloroethylene (trans-1,2 DCE), 1,1 dichloroethylene (1,1 DCE), ~~and~~ vinyl chloride (VC), ~~and other waste constituents of concern~~ (collectively referred to as the contaminants of concern [COCs]) ~~to~~ in the environment.

As detailed in this Order, the ~~Dischargers~~ Respondents have caused or permitted waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the State, which creates, or threatens to create, a condition of pollution or nuisance. The presence of elevated levels of COCs in soil, soil vapor, and groundwater ~~and the threat of vapor intrusion~~ caused by these contaminants constitutes a public nuisance per se because the pollution occurred as a result of discharges of wastes in violation of the WC.

2. **Location:** The former Lake Tahoe Laundry Works (hereinafter referred to as “the Site”) is located at 1024 Lake Tahoe Boulevard, South Lake Tahoe, El Dorado County (Assessor’s Parcel Number 023-430-32-100). The Site is approximately 9,000 feet south of Lake Tahoe and approximately 5,500 feet south of the Tahoe Keys community (Tahoe Keys). The Site is located on the southwest corner of the intersection of Lake Tahoe Boulevard (Highway 50) and Emerald Bay Road (Highway 89) in an area locally referred to as the “South Y Area” (Figures 1 and 2). The portion of the Lake Tahoe Basin adjacent to, and downgradient from the Site relies on groundwater as its primary source of drinking water.¹
3. **Site Description and Activities:** The Site is currently owned and managed by Seven Springs. A laundromat operated at the Site from the early 1970s to 2011. Another laundromat currently occupies the tenant space formerly occupied by Lake Tahoe Laundry Works.
4. **Chemical Usage:** ~~The d~~Depositions of ~~a from~~ former operators², technical reports, regulatory correspondence, public comments, and other documents available in

Commented [A5]: Fox has never owned the referenced property, let alone owned it when a waste discharge occurred.

Commented [A6]: The LTLW has not operated for many years so there are no “current operations.”

As described in Fox’s September 2022 Comments and the associated Technical Comments, there is no evidence of a release mechanism other than a spill in the parking lot.

There is no evidence that anything other than PCE was spilled in the parking lot.

The order should identify COCs by name. The Proposed Order is vague and ambiguous to the extent it seek to include unidentified “other wastes” as constituents of concern.

Commented [A7]: As set forth in Fox’s September 2022 Comments (*see, e.g.*, § V and VI), Fox disputes this statement here and throughout the Proposed Order.

Commented [A8]: Is the Regional Board alleging that the initial discharge violated the Water Code, that alleged ongoing discharges violate the Water Code, or both? Please clarify. If the former, please identify the provision of the Water Code that the Regional Board contends was violated so that Fox can properly assess this claim.

Commented [A9]: A “threat of vapor intrusion” is not a “public nuisance per se.” *See* Fox’s September 2022 Comments § VIII.E.

¹ South Tahoe Public Utility District, 2020. Tahoe South Subbasin (6-005.01) Annual Report 2020 Water Year, March 29, page 8

² AR11290-11678; Deposition of Mary Louise Baisley, former operator starting in 1976 (April 13, 2007)

the case file indicate that PCE, a chlorinated solvent, was stored and used in a coin operated dry cleaning unit (DCU) operated at the Site from 1972 to 1979.

5. **Waste Discharges:** Site assessments conducted at the Site since 2003 indicate that the initial discharges of wastes to the soil and groundwater occurred as a result of ~~dry cleaning operations between approximately 1972 and 1979~~ a spill in the parking lot prior to November 1973. The Site assessments indicate that the soil, soil vapor, and groundwater (Figures 3 through 11) are impacted with COCs. ~~The cleaning solvent delivery, handling, and disposal practices reported to have been utilized at the Site are consistent with the common release mechanisms identified in numerous dry cleaner studies and based upon the experience of State Water Board and Regional Water Quality Control Board staff. Spills/discharges associated with PCE delivery, handling, and disposal practices are the likely sources of waste discharge at the Site.~~

6. **Investigations:** Site investigations started in the South Y Area after PCE was first reported in water supply wells in 1989. Since the initial discovery, multiple regional and site-specific investigations have been conducted by various parties to investigate and cleanup and abate its effects. The investigations conducted to date indicate the general geometry of a contiguous regional PCE plume, approximately one mile long, which originates at the Site and extends through the South Y Area to at least the Tahoe Keys. The lateral and vertical extent of the regional PCE plume shown on Figures 8, 9, and 10 represent estimates based on a summary of previous site-specific investigations conducted between January 2017 and November 2020 and a 2019 and 2020 reconnaissance-level field investigation. Additional investigations are required to address remaining data gaps and further refine the Lahontan Water Board staff's understanding of the lateral and vertical extent of the regional PCE plume.

7. **Remediation:** Remediation efforts at the Site have focused on a limited on-Site (i.e., land within the Site's property boundaries, both above and below the ground surface, hereafter "on-Site") source area identified by the ~~Dischargers~~ Respondents' consultants (Figure 12) and have been insufficient to address the extent of the discharge(s) (Figures 8 through 11). COCs discharged at the Site prior to remedial action implementation continue to discharge and threaten to discharge into waters of the State. COCs in groundwater that have escaped the radius of influence of the on-Site remediation activities continue to migrate, unabated, into municipal and domestic water supplies (Figures 13 and 17).

8. **Discharges Have Impacted Regional Groundwater:** The Lahontan Water Board are conducting a \$4.6 million investigation and the data results from the first two years of investigation conclusively establish that the discharges from the Site have contributed to a contiguous regional PCE plume (Figures 8, 9, and 10), that

Commented [A10]: The footnote only mentions one deposition of one operator. If the Regional Board is aware of multiple depositions of multiple operators, it should revise the footnote to identify them and make those depositions available to Fox.

In addition, please clarify to what the "case file" refers. Please also specify which of the documents in the case file, if any, support this point.

Commented [A11]: The preponderance of the evidence indicates that the PCE contamination at the Site arose from a spill in the parking lot prior to November 1973. See Fox's September 2022 Comments § V.C.

Commented [A12]: Reported by whom? Where was this reported? If the Regional Board chooses retain this language, please identify the source(s) for this statement and share them.

Commented [A13]: These statements are unsupported in the record. If the Regional Board intends to retain this language, please identify to which studies, to which "staff" and to what "experience" this refers. References to unidentified reports and the unspecified experience of unspecified individuals are not persuasive evidence and fail to put Fox on notice of the basis for the Proposed Order.

Commented [A14]: See prior comments. There is no evidence of spills/discharges associated with PCE handling and disposal at the LTLW. As noted above, numerous investigations indicate that a spill in the parking lot during PCE delivery is the source of PCE at the Site.

Commented [A15]: See Technical Comments, including § 2 regarding Fox's disagreement with the Regional Board's description and depiction of a "contiguous regional PCE plume."

Commented [A16]: The remediation system addressed the contaminated area identified by the Regional Board with a remediation system approved by the Regional Board as a final remedy. See Fox's September 2022 Comments § II.B. As noted above, Fox disagrees that Figures 8-11 depict the impact of a plume originating from the LTLW.

Commented [A17]: This issue is addressed at length in the Technical Comments. See, e.g. Technical Comments §§ 2, 3.

Commented [A18]: Fox has reviewed the results of the investigation and is unable to identify what "conclusive[]" evidence shows that PCE from the LTLW has migrated to the entire geographical area depicted on the cited Figures. Please identify the specific evidence that supports this statement.

originates at the Site, and extends, without interruption, north to the Tahoe Keys and to depths of approximately 240 feet below ground surface (bgs). The discharges have impaired Municipal and Domestic Supply (MUN) beneficial use (Figure 13) and COCs are present at concentrations that pose a threat to human health and the environment.

9. **Sources of Information:** The sources of information supporting this Order include, but are not limited to: reports and other documentation in Lahontan Water Board files, including meeting and telephone call documentation, and e-mail communication with ~~Dischargers~~ Respondents, their attorneys, and/or consultants, and Site visits. All of sources of information, including reports and other documentation, supporting this Order and other R relevant reports and data are also available at GeoTracker Global ID No. SL0601754315.³ The Staff Report included as Attachment A provides more detail regarding the underlying bases for this Order.

REGULATORY AND LITIGATION HISTORY

10. The Lahontan Water Board issued a series of WC section 13267 investigative orders to Jim Meredith and Leroy Baisley the ~~Dischargers~~ beginning on June 5, 2003, which initiated soil and groundwater investigations related to the coin operated dry cleaning operation at the Site. The WC section 13267 investigative orders were dated April 12, 2004; May 17, 2004; July 26, 2004; and November 4, 2005, and required description and illustration of floor drain, piping, and connections within the building and definition of the lateral and vertical extent of the discharge. The WC section 13267 investigative orders resulted in the submittal of work plans and technical reporting for the four investigations conducted between 2003 and 2006. The results of the four investigations identified on-Site discharges of PCE and other COCs to soil and groundwater. Although required in these WC section 13267 investigative orders, the lateral and vertical extent of PCE and other wastes was never determined.
11. On April 18, 2006, the Lahontan Water Board issued a WC section 13267 order, directing ~~the Dischargers~~ Seven Springs, SSR Realty Advisors, Leroy and Mary Lou Baisley ("Baisleys") and Kjell and Kerstin Hakansson ("Hakanssons") to submit a corrective action work plan. On July 14, 2006, the Lahontan Water Board Executive Officer agreed to postpone the requirement to submit a corrective action work plan per the ~~Dischargers~~ Respondents' request dated June 9, 2006.
12. On April 8, 2009, the Lahontan Water Board issued WC section 13267 Order No. R6T-2009-0013 directing ~~the Dischargers~~ Seven Springs, Fox, the Baisleys and the Hakanssons to submit a work plan to remove contaminants on the property

Commented [A19]: Please confirm in the text (as indicated by our proposed revisions) that all documents (including all documents in "Lahontan Water Board files" and all meeting and telephone call documentation and emails) relied upon by the Regional Board have been made available on GeoTracker or in the Staff Report.

In a similar vein, please also identify the dates of relevant "Site visits" and any observations made during the Site visits to the extent the Regional Board relies on those visits and observations to support the Proposed Order.

This information is needed so that Fox is fully apprised of the basis for the Proposed Order.

Commented [A20]: This statement is incorrect. The June 5, 2003 order was not issued to any of the parties named as "Dischargers" in this Proposed Order. Indeed, Fox was not named in any of the orders listed in this paragraph.

Commented [A21]: This is incorrect. Fox was not issued an order on April, 18, 2006, and did not request a postponement on June 9, 2006. Please revise to specify to whom these directives were issued and who sought the extension so the public has an accurate understanding of this regulatory history.

³ [Link to Site Case File on GeoTracker](#)

and contain PCE migration in groundwater. The Dischargers Seven Springs and Fox submitted the June 4, 2009 *Remedial Action Workplan for SZA Groundwater Investigation, SZA Groundwater Monitoring, Interim Remedial Action Vadose Zone Soil and Shallow Groundwater Cleanup* and follow-up addendum dated August 26, 2009 to comply. On September 1, 2009, the Lahontan Water Board accepted the tasks described in the above documents as interim remedial actions at the Site.

13. ~~On June 13, 2013, the Lahontan Water Board requested public comments for proposed cleanup actions.~~ The August 12, 2010 Draft Remedial Action Plan recommended the continued operation of the existing air sparge/soil vapor extraction (AS/SVE) system following pilot testing. On June 13, 2013, the Lahontan Water Board requested public comments for proposed cleanup actions. No public comments were received, and the Dischargers Seven Springs and Fox continued operating the AS/SVE system as proposed.
14. On August 2, 2013, the Lahontan Water Board issued WC section 13267 Order No. R6T-2013-0064, which conditionally accepted the continued operation of the AS/SVE remediation system to remediate contaminants in soil, soil vapor, and groundwater and directed ~~the Seven Springs and Fox Dischargers~~ to submit quarterly remediation status reports. Investigative Order No. R6T-2013-0064 also indicated one year of verification monitoring would be required to ensure restoration of beneficial uses to the drinking water aquifer. The Dischargers Seven Springs and Fox have submitted quarterly remediation status reports in compliance with Order No. R6T-2013-0064. Verification monitoring has not been conducted to confirm restoration of beneficial uses.
15. On June 5, 2015, the Lahontan Water Board, Fox, and Seven Springs entered into a Stipulated Agreement for Replacement Water Supply at 883 and 903 Eloise Avenue.
16. On September 15, 2015, the Lahontan Water Board issued a request for comments on Proposed Cleanup and Abatement Order R6T-2015-PROP and subsequently issued a Revised Request for Comments on September 29, 2015. Comments were received from the Dischargers Respondents and three water purveyors following two comment period deadline extensions.
17. On February 17, 2016, the Lahontan Water Board provided a *Satisfaction of Stipulated Agreement for Replacement Drinking Water* letter to Fox and Seven Springs confirming provision of interim water supply and connection of both properties (883 and 903 Eloise Avenue) to public water supply.
18. On July 18, 2016, the Lahontan Water Board issued *Proposed Revisions to Lake Tahoe Laundry Works Cleanup and Abatement Order No. R6T-2016-PROP*, which outlined specific revisions to the proposed cleanup and abatement order and

Commented [A22]: These statements seemed out of sequence as originally presented.

Commented [A23]: Verification monitoring is not required until cleanup criteria have been met.

provided responses to comments received. Comments regarding the proposed revisions were received from the Dischargers/Respondents and water purveyors.

19. On May 12, 2017, the Lahontan Water Board issued Cleanup and Abatement Order No. R6T-2017-0022 (2017 CAO) to the Dischargers/Respondents. Seven Springs and Fox petitioned the 2017 CAO to the State Water Resources Control Board (State Water Board). The State Water Board provided letters dated August 7, 2017, which acknowledged the receipt of petitions and granted Seven Springs' request for its petition to be held in abeyance. On December 21, 2017, Seven Springs requested to have the abeyance removed and the petition for review activated. The State Water Board did not act on either petition and the petitions for Fox and Seven Springs were dismissed on September 11, 2017, and March 22, 2018, respectively.
20. Seven Springs and Fox subsequently challenged the 2017 CAO in El Dorado Superior Court on October 10, 2017, and April 20, 2018, respectively.
21. On June 1, 2020, the El Dorado Superior Court vacated the 2017 CAO as to Fox and remanded to the Lahontan Water Board to consider, with respect to Fox, the criteria established for a former landowner/lessor in *United Artists Theatre Company/Circuit, Inc. v. Regional Water Quality Control Board, San Francisco Region* (2019) 42 Cal.App.5th 851. The Staff Report included as Attachment A provides the analysis supporting identification of Fox as a Discharger/Respondent.
22. In its December 10, 2020, Judgment, the El Dorado Superior Court granted in part and denied in part the Seven Springs petition for writ of mandate. The Court upheld identification of Seven Springs as a Discharger under WC section 13304. The Court found the 2017 CAO to be "properly limited to investigate, cleanup and abate the contamination on the property and originating from the site."
23. The Final Ruling (referenced in the Judgment) also found the portion of the 2017 CAO related to monitoring and technical reports was defective because cost and burden were not considered appropriately. The Court held that the Lahontan Water Board must set forth findings to bridge the analytical gap between the raw evidence and ultimate decision that the burden, including costs, of the technical reports bear a reasonable relationship to the need for the reports. Subsequently, the Court of Appeals issued the opinion in *Sweeney v. California Regional Water Quality Control Board* (2021) 61 Cal.App.5th 1, which upheld a different cleanup and abatement order containing a similar requirement for monitoring and technical reports, pursuant to WC section 13267, that contained no costs, but merely a narrative explanation of the burden and benefits of the required reports.
24. Following issuance of the 2017 CAO to the Dischargers/Respondents, Lahontan Water Board staff engaged in numerous meetings and draft document review and

Commented [A24]: This is incorrect. Fox and Seven Springs filed separate writs on separate dates.

Commented [A25]: This is incorrect. The name of the plaintiff in the case is United Artists Theatre Circuit, Inc.

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Commented [A26]: Fox disagrees with the Regional Board's assessment of the *Sweeney* decision. See Fox's September 2022 Comments § VII.C.

comment cycles with Fox, Seven Springs, and their consultants (EKI Water and Environment, Inc. [EKI] and PES Environmental, Inc. [PES]) to provide informal and formal CAO compliance guidance. The 2017 CAO required a work plan to define the lateral and vertical extent of discharges to groundwater originating from the Site utilizing a dynamic and iterative approach intended to streamline data collection.

25. In regular meetings with ~~the Dischargers~~ Seven Springs (and, until the court ruled in June 2020, Fox) over the past four years, staff regularly 1) requested updates on the ~~Dischargers~~ Respondents' progress in determining the lateral and vertical extent of PCE discharges originating from the Site; 2) reminded the ~~Dischargers~~ Respondents that determining the lateral and vertical extent of PCE was a critical component of the 2017 CAO; and 3) informed the ~~Dischargers~~ Respondents that the Regional Board believes that identification of other potential PCE sources that may be contributing to the regional PCE plume does not mean investigation objectives have been met.
26. Despite these regular communications, the ~~Dischargers~~ Respondents elected to focus on finding additional potential dischargers. The ~~Dischargers~~ Respondents have failed to delineate the lateral and vertical extent of COCs originating from the Site.
27. ~~The Dischargers have continued to delay rather than expedite investigation activities to address CAO requirements. This has resulted in unacceptable schedules for data collection and evaluation of potential remedial options.~~ This Order is necessary to establish clear, enforceable deadlines to complete necessary investigation, cleanup and abatement of discharges, and requirements to supply replacement water.
28. Due to ~~Dischargers~~ Respondents' continued (2003 to present day) failure to delineate the lateral and vertical extent of COCs originating from the Site, and significant impacts to receptors (i.e., drinking water supply wells), requiring ~~immediate~~ corrective actions, Lahontan Water Board staff pursued a grant from the State Water Board's Site Cleanup Subaccount Program (SCAP) in 2018 to address the critical need to take action to characterize the regional PCE plume and identify potential PCE sources. On March 4, 2019, the Lahontan Water Board received a \$4,600,000 SCAP grant to investigate the regional PCE plume in the South Y Area (SCAP Regional PCE Plume Investigation). SCAP Regional PCE Plume Investigation activities were conducted during the 2019 and 2020 field seasons. Initial results provide 1) a general understanding of the lateral and vertical extent of the regional PCE plume, 2) an initial estimate of PCE concentrations and migration pathways within the regional PCE plume, 3) an initial evaluation of impaired, impacted and threatened receptors, 4) a confirmation that the regional PCE plume originates at the Site and extends without interruption from the Site to

Commented [A27]: As noted above, in June 2020, the Superior Court determined that Fox was not properly named in the 2017 CAO. As a result, Fox has not participated in "regular meetings" with staff since that time. To Fox's knowledge, only Seven Springs has participated in such meetings so the reference to "Dischargers over the past four years" is erroneous.

Commented [A28]: These statements unfairly ignore all the work that Seven Spring and Fox completed under the 2017 CAO, onsite and offsite, and the fact that they repeatedly sought and were denied access necessary to conduct additional off-site work.

Commented [A29]: It is unfair and inaccurate to state that Fox has "continued to delay" when it has never been subject to a lawful order, as the court confirmed in June 2020.

Moreover, with respect to the period during which Fox was (unlawfully) subject to the 2017 CAO, this "history" omits the substantial work Fox and Seven Springs completed with respect to CAO requirements and the fact that Fox and Seven Springs sought access to offsite properties, including the Tahoe Basin and former Big O property so that they could conduct sampling at that property at their own expense. See Technical Comments § 1.2.

Commented [A30]: As of this date, Fox has never been named in a lawfully issued order (and was not named in any order in 2003). It is therefore improper to accuse it of any "failure to delineate" from "2003 to present day." Moreover, Seven Springs and Fox have delineated contamination from the LTLW. See e.g., Technical Comments § 1.2. The Regional Board has repeatedly failed to pursue other known sources of PCE or support efforts by Fox and Seven Springs to obtain access to properties like the former Big O Tires site.

Commented [A31]: Given the ongoing work at the LTLW and existing wellhead treatment, there is no need for Respondents to undertake "immediate corrective actions" under this Proposed Order.

Commented [A32]: When it announced receipt of the grant, the Regional Board described the need for it very differently, highlighting that "[s]everal businesses in the South Y area are known or suspected to have used, stored, or disposed of PCE or PCE-containing products" and pledging to use the grant to "track down all potential sources of pollution." https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/2246462762/Proposed%20revisions%20to%20LTLW%20draft%20CAO%207-18-16.pdf. Please revise the text so that the reasons for the grant stated in the Proposed Order align with those that the Regional Board shared with the public at the time.

impaired receptors (i.e., the PCE contamination originating from the Site has migrated from the Site and has contributed to the regional PCE plume). This information supports the need for the actions required by this Order.

29. The obligations contained in this Order supersede and replace those contained in prior orders. However, the prior orders remain in effect for enforcement purposes; the Lahontan Water Board and/or the State Water Board may take enforcement actions (including, but not limited to, issuing administrative civil liability complaints) against dischargers who have not complied with directives contained in previously issued orders.

Commented [A33]: To what prior orders does this refer? Section 9 of the May 2017 order indicates that it superseded prior orders and per the Superior Court's June 2020 ruling, Fox is not subject to the May 2017 CAO.

Commented [A34]: It is confusing to state in one sentence that prior orders are superseded and replaced and in the next to say they remain in effect "for enforcement purposes." The prior orders can't be superseded and also remain in effect.

SITE INVESTIGATION HISTORY AND REMAINING DATA GAPS

30. Site investigations started in the South Y Area in 1989 after PCE was first reported in water supply wells. Since the initial discovery, multiple regional and site-specific investigations have been conducted by various parties to investigate and cleanup and abate its effects. Investigations prior to the 2017 CAO are not summarized here but are available to interested parties in Lahontan Water Board files or electronically on the public GeoTracker website. Additional investigations, including the SCAP Regional PCE Plume Investigation, and quarterly groundwater monitoring and remediation system status reporting, were also conducted after the adoption of 2017 CAO requirements. The following section provides a brief summary of these investigations and the 2015 indoor air investigations, relative to conclusions and data gaps. The Staff Report included as Attachment A provides additional information regarding the Site specific and regional PCE plume investigation history.

Commented [A35]: Please specify what documents and information in these files support the Regional Board's findings.

In addition, please indicate if the referenced files include information that is not included on GeoTracker.

Fox needs this information to understand the basis for the Proposed Order.

Commented [A36]: Please clarify whether this includes the GeoTracker sites for the South Y Regional Contamination Site and the South Y PCE Site.

31. On-Site and off-Site (defined as any land both above and below the ground surface that is outside of the Site's property lines/boundaries, hereafter off-Site) preferential pathway investigation activities were conducted to evaluate the magnitude and extent of contaminant transport along preferential pathways (e.g., discharges that follow disturbed soils or conveyances such as a stormwater conveyance system or other subsurface utility corridors). The preferential pathway investigations indicate:

- a. On-Site waste discharge to the stormwater conveyance system based on the distribution and magnitude of PCE mass in soil vapor and groundwater near stormwater conveyance inlets (Figures 6 and 11) and the detections of PCE in soil within the stormwater conveyance system backfill (Figure 4).
- b. Off-Site contaminant transport via the stormwater conveyance system based on the stormwater conveyance system's configuration and the distribution and magnitude of PCE mass in soil vapor and groundwater near

conveyance inlets and the discharge point into Tucker Basin (Figure 6 and 11).

- c. The evaluation of contaminant transport along the stormwater conveyance system remains incomplete. Additional investigation is necessary to evaluate the magnitude and extent of contamination within and downstream of Tucker Basin.
- d. On-Site discharges to the sanitary sewer are supported by the detections of PCE in soil vapor within utility backfill along the building's western perimeter (Figure 6) and in soil and groundwater beneath the building (Figures 3 and 14, respectively).
- e. The evaluation of potential threat to human health posed by remaining contamination located beneath the Site building, including potential releases from the sanitary sewer, remains incomplete. The on-Site utility video assessment activities did not include inspection of the sanitary sewer pipelines beneath the former dry cleaner tenant space at the Site to identify potential defects. Additional sampling has not been identified or implemented below the building or adjacent to the off-Site sanitary sewer alignment backfill.

Commented [A37]: See Technical Comments §2.6, explaining that available data do not show PCE migrated along storm drain conveyance system.

Commented [A38]: As discussed in the Technical Comments § 2.6, the Regional Board has concluded that PCE from the former Big O Tires site has been discharged to Tucker Basin. Given the Regional Board's determination, any further sampling activities within Tucker Basin should be performed in connection with investigation of PCE sources and preferential pathways on the Big O Tires site.

Commented [A39]: In 2004, the Regional Board reviewed extensive soil data collected along the sanitary sewer line and concluded no PCE release from the sewer occurred. See Technical Comments § 1.1, 2.6. Low PCE masses detected in passive soil gas samples along the sanitary sewer are not proof that PCE was discharged to the sanitary sewer. Instead, PCE likely migrated in soil gas from the area in parking lot where PCE was spilled during delivery.

32. Groundwater data collected from the existing groundwater monitoring well network and from the additional investigations conducted following CAO issuance, including the State-funded SCAP Regional PCE Plume Investigation, indicates:
- a. PCE concentrations in and downgradient of the pre-defined source area of the Site have significantly declined since operation of the AS/SVE remediation system commenced, but recent detections of PCE in on-Site and off-Site groundwater still exceed the United States Environmental Protection Agency (EPA) and California maximum contaminant level (MCL) and California EPA Office of Environmental Health Hazard Assessment Public Health Goals (PHG), which indicates residual mass remains a threat to human health (Figures 7 through 10 and 15).
 - b. PCE concentrations in on-Site and off-Site groundwater also exceed the San Francisco Bay Regional Water Quality Board Environmental Screening Level (ESL) for vapor intrusion which indicates a potential human health threat from the vapor intrusion to indoor air pathway (Figure 11).
 - c. Prior to and following on-Site remediation, COCs were detected in on-Site groundwater at concentrations that exceed MCLs and PHGs and at locations which indicate COCs from the Site migrated and continue to migrate, unabated, impairing the MUN beneficial use in the Lake Tahoe Hydrologic Unit (Figure 13).

- d. PCE is found in groundwater in every downgradient step-out groundwater sample location advanced from the Site's property boundary to the regional PCE plume (Figures 8 through 10 and 16).
 - e. The SCAP Regional PCE Plume Investigation provided an initial estimate of the regional PCE plume's geometry and established that the Site is the most upgradient source of a contiguous PCE plume that extends, without interruption, north to the Tahoe Keys and to depths of approximately 200 feet bgs (Figures 8, 9, and 10). Although an estimate of the regional PCE plume's geometry was provided by these activities, additional investigation is still needed to delineate the extent of contamination in areas and depths where COC concentrations in groundwater remain above background levels and evaluate the impact and threat to human health and the environment.
 - f. Analytical results from multiple investigative studies and water system monitoring document that the regional PCE plume has impaired multiple municipal, small community, and private water supply wells (collectively referred to as water supply wells), and continues to impact and threaten the remaining active water supply wells in and adjacent to the regional PCE plume (Figure 13). Additional evaluation of the potential threat to human health, including potential mitigation measures (including replacement water and potential vapor intrusion), is needed.
 - g. The Dischargers/Respondents' current and historical groundwater monitoring network is not sufficient to evaluate the lateral and vertical extent of COCs originating from the Site and/or adequate to evaluate the known and potential threats to water supply wells (Figure 2).
33. The Dischargers/Respondents conducted a "self-directed" off-Site groundwater investigation in June and July 2017 to identify other potential PCE sources contributing to the regional PCE plume in the South Y Area. The investigation consisted of the collection of multi-depth groundwater samples at 19 locations within the South Y Area. PCE concentrations in groundwater were detected at 17 of the 19 locations; all locations were downgradient from the Site. No sources of PCE were identified upgradient from the Site (Figure 16).
34. Lahontan Water Board conducted an extensive investigation of other potential contributing discharges. On April 3, 2019, 223 WC section 13267 investigative orders were sent to potential responsible parties for 122 properties identified through records searches for businesses that may have used, stored, handled, or disposed of chlorinated solvents, within the estimated regional PCE plume area. The orders required a General Chemical Storage and Use Questionnaire, or a Dry Cleaner Specific Questionnaire be completed (questionnaires). Following the

Commented [A40]: Delineation depends upon the remedial action objectives established as part of cleanup. Further characterization of the Regional PCE Contamination is not needed if the selected remedial action is wellhead treatment, as is currently being performed.

Commented [A41]: The investigation into upgradient sources was "self-directed" because, at the time, the Regional Board declined to participate in an investigation of off-Site sources.

The investigation itself was limited by the lack of access to source properties so that testing had to be done in accessible rights of way. In any event, the investigation identified downgradient sources and the Regional Board expressly relies on this same investigation in Paragraph 16 of the Norma's Cleaners Proposed CAO. See Technical Comments § 2.1 (discussing upgradient sources of the Regional PCE Contamination).

review of questionnaires received and historical Lahontan Water Board Site Cleanup Program case files, the Lahontan Water Board issued site-specific WC section 13267 investigative orders requiring suspected dischargers to investigate the extent of PCE contamination in soil, soil vapor, and groundwater. A source area inventory was developed to support SCAP Regional PCE Plume Investigation tasks and is currently being evaluated relative to the available groundwater data to identify other potential sources. These investigations and evaluation of potential additional PCE sources contributing to the regional PCE plume are ongoing and are not the subject of this CAO. Pursuant to State Water Board Resolution 92-49, the Lahontan Water Board will continue to make a reasonable effort to identify additional dischargers contributing to the regional PCE plume. It is not necessary to identify all dischargers prior to proceeding with requirements for investigation and clean up and abatement.

Commented [A42]: Please explain in what sense these investigations are ongoing and identify the sources the Regional Board continues to investigate. This information is needed to support the statement in this Proposed Order and because Respondents are charged with doing this same work. Sharing this information is necessary to avoid duplication and undue burden.

35. The current Lake Tahoe Laundry Works' conceptual Site model (CSM) is both incomplete and inaccurate, and must be updated. The current CSM does not comply with the requirements of Site investigations since 2003 and the 2017 CAO requirement to determine the lateral and vertical extent of discharges originating from the Site. In addition, the current CSM does not acknowledge (1) the extent of soil contamination above leaching to groundwater ESLs and soil contamination that has been in contact with seasonally shallow groundwater for decades, (2) the extent of potential contaminant migration that occurred prior to remedial implementation, (3) the extent, magnitude, geometry, and trends of the dissolved phase groundwater contamination, (4) on-Site discharges of PCE have contributed to the regional PCE plume, and (5) the current impairments, impacts and threats currently posed to receptors by the contamination originating from the Site.

Commented [A43]: As explained in Fox's September 2022 Comments § VIII.A, the Regional Board does not have authority to require a party to investigate contamination discharged at other sites or to clean up and abate contamination caused or permitted by others.

Moreover, the Regional Board has already identified other responsible parties at the former Big O Tires and former Norma's Cleaners sites. The Regional Board provides no explanation for requiring Fox, but not those parties, to address the Regional PCE Contamination.

36. Since April 2010, soil vapor samples have been collected from the 10 on-Site shallow soil vapor probes, on an approximately quarterly basis, to evaluate the effectiveness of the on-Site AS/SVE remediation system operation. Despite the AS/SVE remediation system operation, recent on-Site PCE concentrations in soil vapor still exceed the vapor intrusion ESL (Figure 5). Additional investigations are required to delineate extent of contamination in soil vapor originating from the Site and evaluate the potential risk to human health due to vapor intrusion (i.e. to indoor air) from the remaining on-Site and off-Site source areas (e.g. Tucker Basin) and off-Site groundwater (i.e. portions of the regional PCE plume outside of the Site's property lines/boundaries).

Commented [A44]: It is unclear what the Regional Board means when it says the "current CSM does not comply..." To what CSM specifically does this refer, and with which requirements does it not comply? As Fox has never been subject to a lawful order, it cannot be out of compliance with any prior order.

Other issues with this paragraph are identified in Fox's September 2022 Comments § 8.D and Technical Comments § 9.1.

37. In July and December 2015, indoor air assessments of select occupied tenant spaces within the South Y Shopping Center were conducted because on-Site shallow soil vapor concentrations of COCs exceeded the vapor intrusion ESL. Although the indoor air PCE concentrations detected did not exceed the ESL for indoor air, PCE was detected in each of the four tenant spaces sampled. The

Commented [A45]: As explained in the Technical Comments § 9.5, soil gas PCE concentrations above the ESL are detected in the interior of the LTLW. These exceedances are bound by soil gas PCE concentrations less than the ESL at the peripheries of the Site. Thus, no further characterization of PCE in soil gas is indicated.

sampling demonstrated actual threats via the vapor intrusion pathway and the need to re-evaluate risk and potential mitigation measures.

38. Investigations conducted to date by ~~the Discharger's consultants and others~~ have not evaluated potential threats or impacts to surface water beneficial uses, including minor surface waters and minor wetlands, and ecological receptors. COC concentrations in soil and groundwater have been reported above ESLs for protection of terrestrial and aquatic habitats.

Commented [A46]: Please explain how and why the Regional Board reached this conclusion in light of the absence of vapor intrusion ESL exceedances. Is it the Regional Board's position that any detections demonstrate a threat and need for mitigation? Or was a particular concentration exceeded that prompts this statement? Fox needs this information to understand the basis for the Proposed Order as well as the standard the Regional Board believes must be met.

REMEDIAL ACTION SUMMARY

Commented [A47]: See Technical Comments § 9.6.

39. In April 2010, an AS/SVE system was installed to remediate chlorinated hydrocarbons in soil and shallow groundwater within the ~~Dischargers' predefined~~ "source zone area" at the Site (Figure 12). An estimated mass of approximately 9862 pounds of VOCs have been removed by the AS/SVE system to date. Due to declining AS/SVE system performance and contamination identified outside of its radius of influence, the ~~Dischargers~~ Respondents must continue to evaluate other remedial options to enhance removal of the residual contaminant mass and to address ongoing off-Site COC migration in groundwater.

Commented [A48]: This is unfair. The Regional Board oversaw and approved of this work. See Fox's September 2022 Comments § II.B.

Commented [A49]: See Technical Comments § 2.4.

Commented [A50]: See Technical Comments § 8.

40. In September and October 2017, batch pumping events were performed to evaluate additional remedial options to remove on-Site PCE in groundwater. No additional batch pumping activities were performed because Lahontan Water Board staff expressed concerns that batch pumping activities could affect the results of an upcoming off-Site groundwater investigation (i.e., continued batch pumping could decrease PCE concentrations in off-Site groundwater and investigation results would not be representative). Post batch pumping groundwater monitoring revealed a significant reduction in PCE concentrations detected from shallow and middle zone groundwater and demonstrated that this may be an effective remediation technology. Monitoring conducted during batch pumping provides additional lines of evidence to support hydraulic connection between the shallow and middle groundwater-bearing zones and the lack of an effective vertical barrier preventing contaminant transport between these zones.
41. In November 2019, an in-situ chemical oxidation pilot test (pilot test) was implemented to evaluate the feasibility of removing PCE remaining in the capillary fringe and shallow groundwater. Post pilot test groundwater monitoring indicate that in-situ chemical oxidation has significantly reduced VOC concentrations and is a potential remediation technology that can reduce PCE mass in shallow and middle zone groundwater.
42. The post pilot test groundwater monitoring also confirmed hydraulic connectivity between "shallow" and "middle" zones of the underlying aquifers. Visual and analytical monitoring results collected during the potassium permanganate

injection pilot test refute a fundamental basis of the Dischargers/Respondents' CSM, that a silt layer is purportedly preventing downward vertical migration of PCE and other COCs in groundwater.

Commented [A51]: See Technical Comments § 9.1.

43. Remedial actions were not implemented in an appropriate timeframe to effectively mitigate the lateral and vertical migration of PCE and other COCs migrating from the Site. Remedial actions were implemented approximately thirty years after the estimated discharge(s) of waste to the environment and were only designed to remediate on-Site soil above the water table and nearby underlying shallow groundwater. Prior to and following on-Site remediation, COCs have been detected in soil and groundwater at concentrations that exceed leaching to groundwater ESLs and MCLs, respectively, indicating ongoing threats to human health and the environment. Some of these areas are outside of the influence of current remediation activities, meaning that COCs continue to discharge and migrate, unabated, into groundwater, impairing the MUN beneficial use (Figure 13).

Commented [A52]: The existing remediation system was designed and implemented in close consultation with and the approval of the Regional Board. For the reasons set forth in the Technical Comments, Fox disagrees that COCs continue to discharge from the LTLW “unabated,” that appreciable migration has occurred or is occurring, or that discharges from the LTLW are impairing the MUN beneficial use.

44. The installed AS/SVE system is not capable of remediating areas outside the pre-defined source zone area (Figure 12), including extensive areas of off-Site impacted groundwater which extend laterally beyond the boundaries of the Site and vertically at depths below the influence of the air sparge wells.

Commented [A53]: The air sparge system was evaluated in a 2016 performance test and found to be effective at addressing contamination originating from the LTLW. See Technical Comments § 2.4.

45. Additional remedial actions are necessary to clean up soil, soil vapor, and groundwater, control off-Site contaminant migration, and restore the MUN beneficial use of groundwater.

46. Water supply wells are currently impaired, impacted, or threatened by the regional PCE plume (Figures 13 and 17). None of the remediation conducted to date directly addresses these impacts. Treatment and/or replacement water is necessary for impaired water supply wells.

Commented [A54]: See Technical Comments § 6.

47. The bases of Dischargers'-Respondents' current CSM must be updated to acknowledge the permeability of the silt layer between the shallow and middle water-bearing zones and further acknowledge the waste discharge and remedial action implementation timeframe and that the AS/SVE system has not eliminated off-Site contaminant migration and does not remediate the full extent of impacted soil, soil vapor and groundwater currently identified.

Commented [A55]: See Technical Comments § 9.1, Fox's September 2022 Comments § VIII.D.

AUTHORITY – LEGAL REQUIREMENTS

48. WC section 13304, subdivision (a) provides that:

“(a) A person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state

board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts. A cleanup and abatement order issued by the state board or a regional board may require the provision of, or payment for, uninterrupted replacement water service, which may include wellhead treatment, to each affected public water supplier or private well owner. Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.”

49. WC section 13304, subdivision (c)(1) provides that:

“the person or persons who discharged the waste, discharges the waste, or threatened to cause or permit the discharge of the waste within the meaning of subdivision (a), are liable to that governmental agency to the extent of the reasonable costs actually incurred in cleaning up the waste, abating the effects of the waste, supervising cleanup or abatement activities, or taking other remedial actions.

50. WC section 13304, subdivision (f) requires that replacement water “shall meet all applicable federal, state, and local drinking water standards, and shall have comparable quality to that pumped by the public water system or private well owner” prior to the discharge of waste.

51. “Impaired wells” for the purposes of the initial interim emergency replacement water evaluation are considered to be water supply wells, as described in Finding 32f, in the “affected area” (see next finding) containing PCE or other COCs in concentrations that are above their respective MCL.

52. The “affected area” for the purposes of the initial interim emergency replacement water evaluation (Order 7bii) is considered to be the area impaired by contamination originating from the Site. The area to be evaluated for interim emergency replacement water is approximately bounded by Lake Tahoe Boulevard to the south, Venice Drive to the north, Glorene Avenue to the

Commented [A56]: Section 13304 requires that parties liable under that Section to provide uninterrupted water service to each “affected” public water supplier or private well owner. In the context of that section, “affected” means “affected by the waste” discharged/caused or permitted to be discharged by the liable party. There is no legal basis for requiring the parties named in this Proposed Order to address wells impaired by waste discharged from other sites.

southwest, West Way to the west, and the South Upper Truckee River to the east. These boundaries shall be revised based on future data collection and evaluation.

53. The Lahontan Water Board acknowledges that providing bottled water to residences or businesses currently served by affected wells would, ~~on its face,~~ satisfy the requirement for uninterrupted replacement water service, specifically since the beneficial use affected is water for consumptive purpose and bottled water could meet this need. ~~However, environmental justice requires that bottled water not be the permanent solution. Long term replacement water likely consists of replacing the source water, thereby allowing community members total and unrestricted use of all household taps for consumptive use. Relying on long term use of bottled water for all consumptive uses for residences that previously had the ability to consume water from any household tap interferes with the free use of their property and deprives those persons of prior quality of life expectations. Where the Discharger's actions require replacement water service, it is appropriate to require that not only the quality, but also the long term replacement water service, be comparable to that which it was prior to the adverse effect to the water supply, even if bottled water must be the source of replacement water service on an interim basis. The fact that replacement water service will likely be in place for many years increases the necessity that there be a requirement in this Order for long term replacement water service that enables the residents of the community to use their household taps.~~

54. WC section 13267, subdivision (b)(1) provides that:

"In conducting an investigation . . . , the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region . . . shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

55. This Order requires investigation and submittal of work plans and reports (collectively referred to as reports) as well as ongoing monitoring ~~and other tasks~~ required pursuant to WC section 13267. The burden, including costs, of these reports bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. Specifically, the reports are needed in order to adequately delineate the extent and amount of waste discharged, assess the threat of continuing discharge and to facilitate compliance with implementing

Commented [A57]: How is "environmental justice" defined by the Regional Board? Upon what authority does the Regional Board rely to impose this requirement? Fox has been unable to identify any legal basis for prohibiting the use of bottled water. Accordingly, this portion of Paragraph 53 should be deleted.

Commented [A58]: To what other tasks does this refer?

cleanup and abatement activities required by this Order, with the ultimate goal of restoring water quality and protecting beneficial uses, including the drinking water supplies of the entire community of South Lake Tahoe. The record contains extensive evidence of the benefits to be obtained, including protecting an entire community from PCE, which is ~~a~~-classified by the EPA as a likely carcinogen to humans. Public health threats are not only in the form of impacts to drinking water supplies (which may be treated at the wellhead), but also include the potential for PCE vapors to volatilize up from the water table, potentially impacting the indoor air of residences and businesses overlying the plume. PCE vapors are not typically noticed (unlike a gas leak, for example), meaning that a person may inhale vapors for years without having any indication. The benefits to be obtained from the requirements for investigation include ensuring the protection of human health of local residents whose businesses and homes overlie the plume.

56. Additional benefits to be obtained include protection of the community's drinking water, both immediately and from threatened impacts that could occur in the future. The Staff Report (Section VII) describes the significant impacts already occurring on the South Lake Tahoe community water supply wells. Multiple water supply wells are currently impaired, impacted, or threatened by the regional PCE plume. For some water supply wells additional evaluation of the potential threat to human health is necessary, and required by the Order, while other certain water supply wells will require ongoing monitoring of known impacts to ensure people in the community are not adversely impacted.
57. Water supply wells in the South Y Area have been taken off-line (i.e., disconnected from the water distribution system), destroyed, or require wellhead treatment to remove PCE from groundwater prior to distribution while many others remain threatened by the regional PCE plume. Figures 13 and 17 display a recent snapshot of the approximate lateral extent of the regional PCE plume and locations of the impaired, impacted, and threatened supply wells in the South Y Area as of September 2020.
58. Municipal supply wells spanning three water districts have been impaired (PCE concentration detected above the MCL), impacted (PCE concentration detected below the MCL), or threatened (PCE has not been detected above the reporting limit but may become impacted or impaired in the future due to regional PCE plume migration) by the regional PCE plume. The three affected water districts include the South Tahoe Public Utility District, Lukins Brothers Water Company and Tahoe Keys Water Company. These three water districts serve approximately 40,000 residents and hundreds of commercial properties. These three water districts provide 97 percent of the South Lake Tahoe's community. With the increased threat and severity of catastrophic wildfires in California, the ability of the community to rely upon these water resources is even more critical.

Commented [A59]: As Section 13267 does not authorize cleanup orders, the assessment of the benefits and costs of the Section 13267 should not include the benefits and costs of remediation.

In addition, for the reasons stated in Fox's September 2022 Comments, the Proposed Order improperly extends to investigation of discharges that did not originate from the LTLW. If the Regional Board revises the scope of the Proposed Order it will also need to revise its assessment of benefits and costs.

Commented [A60]: How many is "many"? Which wells does the Regional Board consider to be "threatened"?

59. Based upon actual costs incurred during the SCAP Regional PCE Plume Investigation, cost estimates provided in the Proposition 1 granted-funded work for regional PCE plume related work, and various State Water Board cost estimation guidance documents and spreadsheets, the estimated costs of complying with the investigation and reporting requirements are in the range of approximately \$6,600,000 to \$11,100,000. Many of these costs are controllable and may be reduced significantly with aggressive and prompt remediation efforts. As an example, many extensive solvent plume cases have been resolved with high resolution investigation and remediation, reducing high concentration solvent plumes down to MCLs within a span of three to five years. That type of remedial effort would significantly reduce estimated long-term monitoring costs. Lahontan Water Board's cost estimate (see Attachment B) primarily focused on the professional services and related contractor costs for the preparation and submittal of technical and monitoring reports required for compliance with this Order under WC section 13267. This estimate is subject to uncertainty based on unanticipated changes in the scope of work, unanticipated changes in field conditions, unanticipated work required by other regulatory agencies, unanticipated changes due to adverse weather, and geographical variations in professional services costs and contractor costs. Tasks and details in the cost estimate (Attachment B) are not being provided as a directive and are not part of the requirements of this Order (see "Required Actions" section). Rather, Attachment B is provided merely to help the [Dischargers/Respondents](#) understand Lahontan Water Board's consideration of the burden and costs associated with the investigation and reporting requirements. The cost of these reports is reasonable in relation to the need for the reports and the benefits to be obtained. The technical reports required by this Order are necessary to assure compliance with WC section 13304 and State Water Board Resolution No. 92-49, including to adequately investigate and cleanup the Site to protect the beneficial uses of waters of the state, to protect against nuisance, and to protect human health and the environment.
60. The State Water Board has adopted Resolution No. 92-49, the Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under WC section 13304 (Resolution 92-49). This Policy sets forth the policies and procedures to be used during an investigation or cleanup of a polluted site and requires that cleanup levels be consistent with State Water Board Resolution 68-16, the Statement of Policy With Respect to Maintaining High Quality of Waters in California (Resolution 68-16). Resolution 92-49 and the Water Quality Control Plan for the Lahontan Region (Basin Plan) establish the cleanup levels to be achieved. Resolution 92-49 requires the waste to be cleaned up to background, or if that is not feasible, to an alternative level that is the most stringent level that is economically and technologically feasible in accordance with California Code of Regulations, title 23, section 2550.4. The Lahontan Water Board's Basin Plan, which was initially adopted on March 31, 1995, and amended from time-to-time, identifies beneficial uses and establishes water quality objectives to protect

beneficial uses. The Site lies within the Tahoe South Subbasin of the Tahoe Valley Groundwater Basin (TVS Basin) of the Lake Tahoe Hydrologic Unit. As set forth in the Basin Plan, the designated beneficial uses for groundwater in the Lake Tahoe Hydrologic Unit include MUN, agricultural supply (AGR), and industrial service supply (IND). Water quality objectives to protect the beneficial use of MUN that apply to the groundwater at the Site include the "Chemical Constituents and Radioactivity", which incorporates by reference state maximum contaminant levels set forth in Title 22 of the California Code of Regulations. The MCLs for PCE and TCE is 5 µg/L, and cis-1,2 DCE is 6 µg/L. As discussed in the Findings of this Order, the concentrations of PCE, TCE, and cis-1,2 DCE in groundwater at and downgradient of the Site exceed the water quality objectives applicable to the wastes.

61. Regionwide Prohibitions in Section 4.1 of the Basin Plan include:
 - a. The discharge of waste that causes violation of any narrative or numeric water quality objective contained in this Plan is prohibited.
 - b. Where any numeric or narrative water quality objective contained in this Plan is already being violated, the discharge of waste that causes further degradation or pollution is prohibited.
 - c. The discharge of waste that could affect the quality of waters of the state that is not authorized by the State or Regional Water Board is prohibited.
62. Unit/Area Prohibitions for the Lake Tahoe Hydrologic Unit in Section 5.2 of the Basin Plan include a prohibition of the discharge attributable to human activities of any waste or deleterious material to surface waters of the Lake Tahoe Hydrologic Unit.
63. The designated beneficial uses of minor surface waters and minor wetlands for the South Tahoe Hydrologic Unit are MUN, AGR, GWR, REC1, REC2, COMM, COLD, WILD, and SPWN. Water quality objectives to protect these beneficial uses include narrative and numerical water quality objectives in the Basin Plan. As set forth in Finding 32, the discharges of waste at the Site exceed the water quality objectives applicable to the wastes.
64. The exceedance of applicable narrative or numeric water quality objectives in the Basin Plan constitutes contamination, pollution and nuisance as defined in WC section 13050.
65. The threat of vapor intrusion into buildings at and near the Site has caused or threatens to cause nuisance as defined in WC section 13050, subdivision (m). In particular, the threat of vapor intrusion is potentially injurious to health, indecent or offensive to the senses, or an obstruction to the free use of property, so as to

Commented [A61]: The "threat of" vapor intrusion is not a nuisance. See Fox's September 2022 Comments § VIII.E.

interfere with the comfortable enjoyment of life or property; affects at the same time an entire community; occurs during or as a result of the treatment or disposal of waste.

- 66. The Lahontan Water Board may require the Dischargers/Respondents to submit a Public Participation Plan or engage in other activities to disseminate information and gather community input regarding the Site, as authorized or required by WC sections 13307.1, 13307.5 and 13307.6.
- 67. This Order requires investigation and cleanup in compliance with the WC, the applicable Basin Plan, State Water Board Resolutions 92-49 and 68-16, and other applicable plans, policies, and regulations. All Dischargers/Respondents are responsible for complying with each and every requirement, unless otherwise specifically noted.

DISCHARGER LIABILITY

- 68. The COCs and other potential waste constituents discharged at the Site constitute “waste,” as defined in WC section 13050, subdivision (d). The ongoing migration of these wastes is a “discharge.” Dischargers/Respondents have thus permitted, caused or permitted, and/or threaten to cause or permit waste to be discharged where it has and probably will be discharged into the waters of the state and have created and/or threaten to create a condition of pollution and nuisance.
- 69. Dischargers/Respondents are liable for public nuisance because they created and/or contributed to the creation of groundwater contamination that has impaired the MUN beneficial use. Despite knowing of significant contamination Dischargers/Respondents have failed to delineate the lateral and vertical extent of the regional PCE plume, as required by Lahontan Water Board orders over a period of several years, or remediate known contamination that continues to migrate, unabated.

Seven Springs Limited Partnership

- 70. The El Dorado Superior Court upheld naming Seven Springs as a Discharger. Seven Springs is the current owner of the property, indisputably knows of the ongoing discharge of waste and has the legal ability to control it.

Connolly Development, Inc.

- 71. The coin operated DCU used PCE as a cleaning solvent and was present at the Site from 1972 to about 1979/1980. During this time there were two prior landowners, Connolly Development, Inc. and Century Properties Equity Fund 73. Connolly Development, Inc., formed in 1966, purchased the property to develop the Site. Connolly Development, Inc. owned the Site starting around 1972 and up

Commented [A62]: Fox addresses these issues at length in Fox’s September 2022 Comments.

Commented [A63]: The Regional Board should explain how these definitions apply to the facts of this case and not just state that they do.

Commented [A64]: Fox disagrees that migration of waste is a discharge under each of the relevant statutes or that appreciable migration from the LTLW is “ongoing.”

Commented [A65]: The Regional Board has not alleged the elements of a claim for public nuisance against a landlord. *Chee v. Amanda Gold Prop. Mgmt.*, 50 Cal. Rptr. 3d 40, 50 (Cal. Ct. App. 2006); *Resolution Tr. Corp. v. Rossmoor Corp.*, 34 Cal. App. 4th 93, 102 (1995). As explained in Fox’s September 2022 Comments, there is no evidence that Fox created or contributed to the creation of groundwater contamination; it has never been subject to a lawful order requiring it to delineate contamination; contamination from the LTLW has been adequately delineated; the LTLW contamination is being effectively remediated by a system approved by the Regional Board.

until it sold the Site in September 1974 to Century Properties Equity Fund 73. Century Properties Equity Fund 73 then leased the Site in September 1974, including a lease back to Connolly Development Inc. for at least one year, and later sold it on December 19, 1985.

72. Connolly Development Inc. is named as Discharger because of ~~their~~ its ownership and lease of the property, and knowledge of the coin operated DCU at the Site during their ownership and lease. As owner of the property, Connolly Development had knowledge of and control over the activities occurring at the Site that caused the discharge, which include the re-filling of the drum that contained the solvents, and the legal ability to prevent the discharge. As the owner of the Site, Connolly Development had control over leasing out retail space, managing and maintaining common areas such as sidewalks, parking areas and delivery areas. Connolly Development was identified as a Discharger in the 2017 CAO and did not contest liability.

Century Properties Equity Fund 73

73. Century Properties Equity Fund 73 (Century 73), a Limited Partnership, was also the owner of the Site at the time the self-service, coin-operated, dry cleaning machine existed in the laundromat at the Site. Like Connolly Development, as the owner of the Site, Century 73 had knowledge of and control over the activities occurring at the Site that caused the discharge and had the legal ability to prevent the discharge. Even if the discharge occurred during the time that Connolly Development owner the property, under established Water Board precedent, Century 73 would be considered to have been in possession during the time of the discharge because “the discharge continues as long as pollutants are being emitted at the site.” (SWRCB WQ Order 89-8, p. 14.)

74. Century 73 was identified as a Discharger in the 2017 CAO and did not contest liability.

Fox Capital Management Corporation

75. ~~Fox & Carskadon Financial Corporation~~ ~~Fox Capital Management Corporation~~ was the general partner of Century 73 and subsequently changed its name to Fox Capital Management Corporation in or around 1986. As Century 73’s general partner, it is liable for all obligations of the limited partnership, including the environmental contamination from the operation of the partnership. As a general partner, Fox Capital Management Corporation, formerly Fox & Carskadon Financial Corporation, also had knowledge of and control over the activities occurring at the Site that caused the discharge. The evidence establishes that Fox knew or should have known of the general activity that created a reasonable

Commented [A66]:

In addition to the comments provided in Fox’s September 2022 Comments, Fox disagrees that discharges occurred during Century 73’s ownership. Moreover, after *United Artists*, it is clear that “being in possession during the time of the discharge” is not a basis for liability under Section 13304 of the Water Code.

Commented [A67]: This statement is both inaccurate and irrelevant. Century 73 was not named as a Discharger in the 2017 CAO. 2017 CAO Par. 38 (“38. This Order is being issued to Seven Springs Limited Partnership, Connolly Development, Fox Capital Management Corporation, and Bobby Pages, Inc, which are collectively referred to as “Dischargers.”).

Nevertheless, in contesting the 2017 CAO, Fox repeatedly and explicitly argued that Century 73 was not liable under the Water Code. See Fox’s Verified Petition for Writ of Administrative Mandamus, *Fox v. Reg’l Bd.*, Case No. SC20170189 (Cal. Super. Ct. El Dorado Cty., Oct. 17, 2017); Reisch, Fox’s Response to Revised Cleanup and Abatement Order for Former LTLW (Sept. 8, 2016).

Finally, as the Regional Board well knows, Century 73 voluntarily dissolved in 1990. See Certificate of Cancellation – Limited Partnership, Century Properties Equity Fund 73 (filed Jun. 29, 1990). The fact that a defunct entity did not itself contest liability under an order in which it was not named as a respondent is hardly surprising and not evidence of anything.

Commented [A68]: See Fox’s September 2022 Comments § V.F. In addition, Fox is aware of no evidence of any “environmental contamination from the operation” of Century 73. The operations of the partnership and the operations of the partnership’s tenants are not the same thing.

possibility of discharge into waters of the state that could create or threaten to create a condition of pollution or nuisance.

Bobby Page's, Inc.

76. This Order also names Bobby Page's, Inc., who operated the DCU at the Site and subleased the Site to other dry cleaner operators during the relevant period (1972 through 1979/1980) the DCU was present at the Site. Bobby Page's, Inc., was identified as a Discharger in the prior Cleanup and Abatement Order and did not contest liability.
77. The Lahontan Water Board will consider whether additional dischargers caused or permitted the discharge of waste at the Site and whether additional dischargers should be added to this Order. The Lahontan Water Board may amend this Order or issue a separate order or orders in the future as more information becomes available. The Lahontan Water Board is issuing this Order to avoid further delay of Site remediation and provision of replacement water.

Commented [A69]: The Regional Board should impose equivalent requirements on the current owners of all sites that are known or suspected to be contributing to the Regional PCE Contamination.

OTHER CONSIDERATIONS

78. Issuance of this Order is being taken for the protection of the environment in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code § 21000 et seq.). This Order requires the Dischargers Respondents to submit plans for approval prior to implementation of cleanup activities at the Site. Submittal of plans is exempt from CEQA as it will not cause a direct or indirect physical change in the environment and/or is an activity that cannot possibly have a significant effect on the environment. (Cal. Code Regs., tit. 14, § 15061, subd. (b)(3).) CEQA review of potential future plans would be premature and speculative at this time, as there is not enough information concerning the Dischargers Respondents' proposed remedial activities and possible associated environmental impacts. If the Lahontan Water Board determines that implementation of any future proposed plan required by this Order will have a significant effect on the environment, the Lahontan Water Board will conduct the necessary and appropriate environmental review prior to Executive Officer's approval of the applicable plan. Many activities, including groundwater and soil vapor sampling, well installation and some forms of remediation are ministerial projects exempt from CEQA. (Cal. Code Regs., tit. 14, § 15268.) The Lahontan Water Board has already reviewed past and existing efforts to conduct AS/SVE, groundwater batch pumping and in situ chemical oxidation prior to implementation and determined these activities do not have a significant effect on the environment. (Cal. Code Regs., tit. 14, § 15061, subd. (b)(3).)

79. Pursuant to WC section 13304, the Lahontan Water Board may seek reimbursement for all reasonable costs to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action.
80. It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes (WC section 106.3.). This Order promotes that policy by requiring the DischargerRespondent(s) to clean up the groundwater to ensure protection of drinking water and provide replacement water.
81. The Lahontan Water Board has adopted State Water Board Resolution No. 2017-0012 Comprehensive Response to Climate Change (Comprehensive Response to Climate Change). This Order promotes the Comprehensive Response to Climate Change and implementation of the Sustainable Groundwater Management Act to help protect groundwater resources against drought and climate change to ensure the community of South Lake Tahoe has access to safe, accessible, and affordable drinking water.
82. Any person aggrieved by this action of the Lahontan Water Board may petition the State Water Board to review the action in accordance with WC section 13320 and title 23, California Code of Regulations, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Filing a petition does not stay operative deadlines and requirements. Copies of the law and regulations applicable to filing petitions will be provided upon request or may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality

REQUIRED ACTIONS

THEREFORE, IT IS HEREBY ORDERED, pursuant to WC sections 13304 and 13267 that the DischargersRespondents shall investigate, cleanup the waste and abate the effects of waste forthwith discharging at and from **1024 Lake Tahoe Boulevard, South Lake Tahoe, California, including the extent of the regional PCE plume**. "Forthwith" means as soon as reasonably possible, but in any event no later than the compliance dates in Attachment C, Time Schedule. More specifically, the DischargersRespondents shall:

1) **Develop and Submit a CSM**

The CSM shall be based upon the data collected by the DischargersRespondents as well as other data sources (e.g., data collected during SCAP Regional PCE Plume Investigation as well as data collected by others within and adjacent to the

regional PCE plume). The CSM shall be prepared in accordance with the most recent available USEPA and DTSC guidance⁴.

Currently available information indicates that assessment, characterization and delineation of waste constituents is incomplete, and the preparation and submittal of work plans to complete assessment and characterization of COCs in soil, soil vapor, and groundwater and to fully delineate the vertical and lateral extent of waste in soil, soil vapor, and groundwater (on-Site and off-Site) is still needed. The bases for the additional work shall be described in the CSM and proposed in the work plans as set forth in Orders 2 through 5 below. The CSM and all future CSM updates shall:

- a. Provide a written presentation with graphic illustrations of nature and extent of COCs in soil, soil vapor, and groundwater originating from the Site contributing to the regional PCE plume and potential and known impacts of contamination to human and ecological receptors.
- b. Include a description of discharge scenario(s), regional PCE plume geology and hydrogeology, on-Site and off-Site preferential pathways (e.g., stormwater conveyance system, sanitary sewer, other subsurface utilities), potential vertical conduits (e.g. water supply wells and monitoring wells), distribution of wastes in soil, soil vapor, and groundwater, exposure pathways associated with the regional PCE plume, sensitive receptors (i.e., schools, day cares, nursing homes, etc.) and water supply wells.
- c. Acknowledge 1) off-Site migration of PCE contamination has occurred in the past, and is still occurring, 2) the regional PCE plume originates at the Site and continues without interruption to the Tahoe Keys (and potentially beyond), 3) the regional PCE plume has impaired the MUN beneficial use of groundwater, 4) PCE contaminant transport from the Site has occurred since the initial release that occurred over 40 years ago and is still occurring despite the operation of the AS/SVE system since 2010, 5) the AS/SVE system does not remediate the full extent of soil, soil vapor and groundwater contamination currently identified on-Site which has resulted in the discharge of PCE off-Site, 6) an effective lithologic barrier to inhibit downward migration of PCE contamination in groundwater does not exist at the Site and there is a hydraulic connection between shallow and middle water bearing zones, and 7) the Site meets all of the ~~Dischargers~~ Respondents' PCE source criteria defined and is a PCE source contributing to the regional PCE plume.

⁴ DTSC's June 2012 *Guidelines for Planning and Implementing Groundwater Characterization of Contaminated Sites*

- d. Identify data gaps to be addressed in the Site Investigation Work Plan(s).
- e. The CSM and routine CSM updates (as new data becomes available) acceptable to the Executive Officer shall be submitted in conformance with the requirements detailed in Attachment C, Time Schedule.

Commented [A70]: "Data" is a plural noun.

2) Prepare and Submit a Sampling and Analysis Plan and Quality Assurance Project Plan

- f. Prepare and submit a comprehensive Sampling and Analysis Plan (SAP), documenting the procedural and analytical requirements for sampling soil, soil vapor, surface water (if applicable), subsurface utility backfill (e.g., stormwater and sanitary sewer conveyance system backfill) and groundwater. The SAP will be utilized for all phases of investigation, monitoring, and remediation system performance monitoring.
- g. Prepare and submit a comprehensive Quality Assurance Project Plan (QAPP) describing the quality assurance procedures, quality control activities, and technical activities that will be implemented to ensure data quality objectives are met.
- h. Update the SAP and QAPP as necessary to accommodate applicable regulatory changes, sampling method changes, analytical test method changes, and scope of work changes.
- i. A SAP and QAPP, acceptable to the Executive Officer, shall be submitted in conformance with the requirements detailed in Attachment C, Time Schedule.

3) Develop, Submit, and Implement Site Investigation Work Plan(s)

The Site Investigation Work Plan(s) (SIWP) shall propose investigation activities to update on-Site and off-Site information with the data required to define the full lateral and vertical extent of the discharge and evaluate potential threats to human health and ecological receptors. The data collected will be used to support development of the Monitoring Well Installation Work Plan (Order 4), Vapor Intrusion Work Plan (Order 5), Human Health and Ecological Risk Assessment (Order 6), and recommendations for appropriate interim (Order 7d) and final (Order 7e) remedial actions to cleanup and abate contamination, including replacement water (Orders 7b and 7c). The SIWP shall:

Commented [A71]: In the court proceedings, the Regional Board told the Court that "the extent of PCE contamination in the vadose zone (above the groundwater zones) has been defined." Opp. 37 at n.12. The Board cannot tell the Court one thing and issue an order that says another, unless it has new information that justifies its change of position. Does the Regional Board have such data?

- j. Fully assess the lateral and vertical extent of wastes in soil, soil vapor, and groundwater to support evaluation of the potential threat from each media through each relevant exposure pathway for all identified COCs originating from the Site. "Fully assess" means the Dischargers/Respondents must

perform step-out sampling, both laterally and vertically, until soil and soil vapor concentrations are defined to the applicable ESLs (i.e., direct exposure, vapor intrusion, terrestrial habitat, leaching to groundwater) and groundwater concentrations of COCs are defined to 0.5 µg/L (i.e., the reporting limit for each COC; the method detection limit will be utilized as the practical limitation for defining natural background concentrations). If investigation data are being collected to support the Human Health and Ecological Risk Assessment, applicable health and ecological-based screening levels shall be considered when developing data quality objectives for the SIWP.

- k. Fully assess the extent of discharges along preferential pathways (e.g., stormwater conveyance system [including Tucker Basin and other stormwater retention/infiltration basins in the system], sanitary sewer, other subsurface utilities) within the regional PCE plume to support evaluation of the potential threats to human health.
- l. Fully assess the migration of discharges along vertical conduits (e.g., water supply wells and monitoring wells) within the regional PCE plume to support evaluation of the potential threats to human health.
- m. Fully assess COC-impacted soil, soil vapor, and groundwater to support evaluation of the potential threats to sensitive receptors (i.e., schools, day care facilities, nursing homes, etc.).
- n. Fully assess COC-affected soil, soil vapor, surface water (e.g., stormwater conveyance system infiltration/detention basins), and groundwater to support evaluation of the potential threats to ecological receptors.
- o. Provide an implementation schedule for delineation activities described above. Step-out sampling shall proceed without significant interruption. Any failure to continue conducting sampling for a period exceeding ten business days is a significant interruption. If a significant interruption is anticipated or occurs, [Dischargers/Respondents](#) shall notify the Lahontan Water Board (i.e., case manager) immediately with an explanation of the cause of the delay and steps the [Dischargers/Respondents](#) will take to resolve it. Notification does not excuse noncompliance. Exceptions will be considered for interruptions related to circumstances beyond the [Dischargers/Respondents](#)' control, such as unanticipated supplemental work plan review and approval process time, contractor availability, short-term adverse weather disruptions, and long-term adverse weather disruptions (i.e., the Basin Plan's Tahoe Basin annual soil disturbance prohibition period extending from October 15 to May 1).

- p. The ~~Dischargers~~ Respondents' investigation strategy shall not stop based upon an alleged contribution from another site (e.g., the evaluation of the stormwater conveyance system on the Former Big O Tire site to Tucker Basin).
- q. Concurrent and phased on-Site and off-Site investigations are warranted due to the previous protracted investigations, and completion of the full Site characterization may require multiple submittals of SIWP for review and approval.
- r. A SIWP, acceptable to the Executive Officer, shall be submitted in conformance with the deadline detailed in Attachment C, Time Schedule.
- s. Scheduling, implementation, completion, and reporting of all Site investigation related activities required in this Order shall be conducted in conformance with the requirements detailed in Attachment C, Time Schedule and Attachment D, Technical Report Requirements.

4) Develop, Submit, and Implement a Monitoring Well Installation Work Plan(s)

The Monitoring Well Installation Work Plan(s) (MWIWP) shall propose a monitoring well network and program that is appropriate to 1) evaluate migration of COC-impacted groundwater, 2) evaluate regional PCE plume behavior at the plume boundaries, 3) evaluate COC trends in groundwater within the regional PCE plume, 4) evaluate COC trends within the estimated capture zones of water supply wells, 5) provide early detection capabilities (sentry wells or other equivalent mechanism) for impacted and threatened water supply wells, and 6) aid in evaluating interim and final remedial actions. The MWIWP shall:

- t. Fully evaluate available groundwater and lithological data generated from the SIWP(s), Discharger's investigations, the SCAP Regional PCE Plume Investigation, and work conducted by others within the regional PCE plume to support well location and design rationale.
- u. Identify specific data quality objectives and rationale for each well to be utilized in the monitoring well network and incorporated into the groundwater monitoring and reporting program. At a minimum, the well name, well/property owner, well location description, well installation method(s), well construction details (i.e., diameter and material, total depth, annular seal depths, filter pack interval, and screen interval), rationale, and sampling frequency shall be provided.
- v. Provide copies of access agreements and/or written permission to install/utilize existing wells on properties owned by others, encroachment

permits, and El Dorado County Department of Public Health drilling/well installation permits.

- w. Provide an implementation schedule for installing any monitoring wells to be utilized in the monitoring well network within the MWIWP.
- x. A MWIWP, acceptable to the Executive Officer, shall be submitted in conformance with the deadlines in Attachment C, Time Schedule.
- y. Scheduling, implementation, completion, and reporting of all site assessment related activities required in this Order shall be conducted in conformance with the requirements detailed in Attachment C, Time Schedule and Attachment D, Technical Report Requirements.

5) Develop, Submit, and Implement a Vapor Intrusion Investigation Work Plan

The Vapor Intrusion Investigation Work Plan (VIWP) shall evaluate current concentrations of waste constituents in on-Site and off-Site soil vapor and propose an investigation in accordance with the most current indoor air sampling and mitigation guidance⁵ to investigate areas with identified potential vapor intrusion threats (e.g., tenant spaces within the existing on-Site building). The VIWP shall:

- z. Implement an investigation to evaluate the risk posed to human health through the vapor intrusion to indoor air pathway from soil vapor (including vapors from VOC-affected groundwater) and consider the transport of COC-affected soil vapor and groundwater along preferential pathways (e.g., stormwater conveyance system, sanitary sewer, other subsurface utilities and their backfills). The investigation shall evaluate both on-Site and off-Site locations and consider temporal and seasonal variability.
- aa. Describe soil vapor probe installation and sampling methods for collection of sub-slab soil vapor samples.
- bb. Describe indoor air and ambient air sample collection methods.
- cc. Estimate the incremental and cumulative cancer risk and non-cancer hazard indices and include calculations, explanatory text interpreting and qualifying the results in Report(s).
- dd. Collect and evaluate indoor air data in accordance with the DTSC HERO HHRA Note 5, which identifies the EPA Region 9 Interim Indoor Air

⁵ *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* (DTSC, CalEPA, October 2011) and *Advisory-Active Soil Gas Investigations* (CalEPA, July 2015)

Response Action Levels for indoor air concentrations of TCE under differing exposure scenarios and determine if a Proposition 65 notice is required.

- ee. Identify and recommend soil vapor sampling points or wells and the associated sampling frequency to be used for any long-term soil vapor monitoring.
- ff. Provide an implementation schedule within the VIIWP.
- gg. A VIIWP acceptable to the Executive Officer shall be submitted in conformance with the requirements detailed in Attachment C, Time Schedule.
- hh. Scheduling, implementation, completion, and reporting of all site assessment related activities required in this Order shall be conducted in conformance with the requirements detailed in Attachment C, Time Schedule and Attachment D, Technical Report Requirements.

6) Prepare and Submit a Human Health and Ecological Risk Assessment

Prepare and submit a human health risk assessment (HHRA) and, if applicable, an ecological risk assessment, considering all waste constituents in soil, soil vapor, surface water, and groundwater, all exposure pathways and sensitive receptors and applying existing regulatory human health and ecological screening levels and/or acceptable risk assessment models in accordance with current guidance. The HHRA shall, at a minimum:

- ii. Evaluate the potential risk COCs pose to the complete exposure pathways for soil and groundwater (i.e., ingestion, dermal exposure, inhalation and ecological exposure).
- jj. Evaluate the potential risk COCs pose to the vapor intrusion to indoor air pathway for soil vapor and groundwater, including potential short-term exposure to TCE.
- kk. Compare available soil, soil vapor, surface water, and groundwater COC concentrations to soil, soil vapor, and groundwater ESLs and MCLs to evaluate the potential and known threats the remaining contamination poses to human health and ecological receptors.
- ll. Complete a screening level evaluation or a Site-specific risk assessment. If [Dischargers/Respondents](#) complete a Site-specific risk assessment, exposure levels selected must be relevant for exposure pathways and receptors for the Site and shall be acceptable to the Executive Officer and may be reviewed by the California Office of Environmental Health Hazard

Assessment (OEHHA). Acceptable exposure levels for Site COCs shall be considered when developing remedial alternatives.

- mm. The HHERA shall conform with the most current guidance documents⁶, and be acceptable to the Executive Officer.
- nn. A HHERA, acceptable to the Executive Officer, shall be submitted in conformance with the deadlines in Attachment C, Time Schedule.
- oo. Scheduling, implementation, completion, and reporting of all HHERA (if applicable) related activities required in this Order shall be acceptable to the Executive Officer and conducted in conformance with the requirements detailed in Attachment C, Time Schedule.

7) Conduct Remedial Action

Develop and implement a cleanup and abatement program for the cleanup of wastes in the soil, soil vapor, surface water, and groundwater and the abatement of the effects of the discharges of waste on beneficial uses of water, human health, and the environment. Remedial actions shall include, at a minimum:

pp. **Current Corrective Actions**

- i) The Dischargers/Respondents shall continue to operate the existing AS/SVE system at the Site until alternate and/or additional remedial methods are implemented or otherwise accepted.

qq. **Develop, Submit, and Implement Interim Emergency Water Replacement Plan**

- i) For all impaired wells within the affected area (see Findings 51 and 52) that are owned or operated by municipal water supply entities, provide a report to the Lahontan Water Board that is acceptable to the Executive Officer describing how the Dischargers/Respondents intend to provide (or pay for) interim replacement water to each affected municipal supply entity until the permanent water supply plan is proposed and implemented. If interim replacement water is selected rather than payment, the report shall address the following: source(s) of the replacement water, available information on the

⁶ Preliminary Endangerment Assessment Guidance Manual (DTSC, Revised October 2015), Supplemental Vapor Intrusion Guidance, DTSC HERO HHRA Note 5, Vapor Intrusion Mitigation Advisory (DTSC, 2011b), San Francisco Bay Regional Water Board Vapor Intrusion Framework (SF Bay Water Board, 2014), and Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air (USEPA, 2015)

variability of the quality of the supply water, supply chain management considerations, proposed testing frequency based on any variability information and supply chain management plans, and a contingency plan.

- ii) For all impaired wells within the affected area (see Findings 51 and 52) that are owned or operated by municipal water supply entities, provide (or pay for) interim emergency uninterrupted replacement water service and/or treatment.
- iii) For all non-municipal water supply wells within the affected area determine whether wells are impaired.
- iv) For all non-municipal water supply wells that are impaired, provide interim emergency uninterrupted replacement water service and/or treatment.
- v) The requirement to provide interim emergency water supply will be suspended once the Discharger provides an acceptable permanent replacement water supply or treatment option as described in Order 7c.
- vi) Provide a report to the Lahontan Water Board listing all wells that have been provided interim emergency uninterrupted water service. The report must include addresses and unique well identification numbers. The report must list the bottled water service being used or describe the treatment implemented and the water volume being provided or describe the alternative water supply option being implemented. The report must include documentation to show that interim water supply meets state primary and secondary drinking water standards. If interim water supply is denied by a property owner or occupant, the report shall include proof or evidence of such refusal.
- vii) Provide a report to the Lahontan Water Board prior to changing any aspect of the method for providing interim replacement water service. However, in the case where the Discharger must change its method due to unplanned or unanticipated quality issues or availability, the Discharger may change its method without first notifying the Water Board if needed to maintain compliance with this Order.
- viii) Scheduling, implementation, completion, and reporting of all Interim Emergency Water Replacement related activities required in this Order shall be acceptable to the Executive Officer and conducted in

conformance with the requirements detailed in Attachment C, Time Schedule.

rr. **Develop, Submit, and Implement Permanent Water Replacement Plan**

- i) Develop a comprehensive Permanent Water Replacement Plan (PWRP), acceptable to the Executive Officer, to provide long term uninterrupted wellhead treatment and/or replacement water service (provision of or payment for) to each affected water districts or non-municipal well owner within the “affected area” described in Finding 51, including those removed from service and/or destroyed due to PCE impairment (i.e. lost and/or reduced well yield shall be replaced/restored). Any replacement water shall, at a minimum, meet all applicable federal, state, and local drinking water standards (e.g. MCLs or any other another relevant regulatory standards in the Basin Plan) and shall have comparable quality to that pumped by the public water system or non-municipal water supply well owner prior to the discharge of waste. “Uninterrupted replacement water service” means that water shall be supplied continuously to meet human water consumption needs (including drinking and cooking) with no break in water availability longer than two hours.

The PWRP shall also evaluate the threat the regional PCE plume poses to water supply wells that may become impaired in the future and contain a contingency plan to immediately provide uninterrupted replacement water service, should those wells become affected. The PWRP shall include, at a minimum:

- (1) Figures, tables, and narrative identifying and assessing supply wells affected by or threatened by the regional PCE plume.
- (2) A summary of the impaired, impacted, and threatened supply well names, property/well owner, well location description, well installation method(s), well construction details (i.e., diameter and material, total depth, annular seal depths, filter pack interval, and screen interval) and most recent sampling data.
- (3) A description of initial assessment sampling activities that have been, or will be, implemented in conformance with the SAP at each impaired, impacted, and threatened supply well to evaluate human health risk and impacts to beneficial use of groundwater.

- (4) An evaluation of at least three different methods to provide replacement water to impaired water supply well owners including the “pay for option” to provide long term replacement water. The evaluation shall include the following, at a minimum:
 - (a) Discussion of the feasibility and timing to implement each method including the need and timing for permits, approvals, and environmental analysis.
 - (b) Comparison of the quantity of water that can be provided by each method relative to the specific water supply well need (e.g., typical domestic household supply need).
 - (c) An analysis of byproducts or wastes that may be generated by each method including disposal options and costs.
 - (d) A water quality monitoring and reporting plan to verify quality and performance of the implemented replacement supply or wellhead treatment.
 - (e) A communication plan to document discussion and consent for implementation of the replacement water supply or wellhead treatment from the public water suppliers and private well owners with affected wells.
 - ii) A PWRP, acceptable to the Executive Officer, shall be submitted in conformance with the deadlines in Attachment C, Time Schedule.
 - iii) Scheduling, implementation, completion, and reporting of all PWRP related activities required in this Order shall be conducted in conformance with the requirements detailed in Attachment C, Time Schedule.
- ss. **Interim Remedial Action Plan**
- i) Submit an initial and comprehensive Interim Remedial Action Plan (IRAP), consistent with State Water Board Resolution No. 92-49, to evaluate interim remedial action alternatives where COCs exceed screening levels for protection of human health and the environment. The IRAP shall address on-Site and off-Site areas impacted by discharges originating from the Site and provide the technical basis for selecting and designing final remedial measures. Phased and

Commented [A72]: See Technical Comments. If the Regional Board retains this section, it should only apply to discharges originating from the LTLW.

concurrent investigations will be necessary to support IRAP implementation. The IRAP shall recommend one or more alternatives for implementation and include plans to address immediate threats identified through currently available information and from data collected during SIWP implementation. The IRAP shall include, at a minimum:

- (1) A plan to enhance contaminant mass removal and address off-Site COC migration at the Site.
 - (2) A plan to evaluate and destroy any vertical conduits (e.g., water supply wells and/or monitoring wells) within the regional PCE plume that allow the downward migration of COCs.
 - (3) A plan to remediate COCs identified in any preferential pathways (e.g., stormwater conveyance system/Tucker Basin) located within the regional PCE plume.
 - (4) A plan to mitigate any threats to human health at the Site or off-Site via the vapor intrusion to indoor air pathway.
 - (5) A plan to address any immediate threats to the MUN beneficial use of groundwater outside of the PWRP actions.
 - (6) A proposed time schedule for IRAP plan implementation.
- ii) An IRAP, acceptable to the Executive Officer, shall be submitted in conformance with the requirements in Attachment C, Time Schedule.
- iii) Scheduling, implementation, completion, and reporting of all IRAP related activities required in this Order shall be conducted in conformance with the requirements detailed in Attachment C, Time Schedule.
- tt. Remedial Action Plan
- i) Develop and submit a comprehensive Remedial Action Plan(s) (RAP) for cleanup of wastes in the soil, soil vapor, and groundwater [at or originating from the Site](#). The RAP shall include, at a minimum:
 - (1) A feasibility study or assessment report for evaluation of the cleanup technologies considered for remediation of soil, soil vapor and groundwater and the need for any additional interim remedial measures and pilot tests. Multiple remedial

measures may be needed and may be implemented to achieve all cleanup goals.

- (2) Cleanup proposals for soil, soil vapor, and groundwater that comply with State Water Board Resolution 92-49 and Resolution 68-16.
 - (3) A Description of the selection criteria for choosing the proposed method over other potential remedial options. Discuss the technical merit, suitability of the selected method under the given site conditions and waste constituents present, economic and temporal feasibility, and immediate and/or future beneficial results.
 - (4) A Description of any pilot projects intended to be implemented.
 - (5) An Estimate of cumulative mass of wastes to be removed and timeframe to reach cleanup goals with the selected method(s). Include all calculations and methodology used to obtain this estimate.
 - (6) A proposed schedule for completion of the RAP.
- ii) A RAP, acceptable to the Executive Officer, shall be submitted in conformance with the requirements detailed in Attachment C, Time Schedule.
 - iii) Scheduling, implementation, completion, and reporting of all RAP related activities required in this Order shall be conducted in conformance with the requirements detailed in Attachment C, Time Schedule.

8) Prepare and Submit a Public Participation Plan

- uu. Prepare and submit a Public Participation Plan (PPP) in accordance with WC sections 13307.5 and 13307.6 and current USEPA, CalEPA, and DTSC guidance for public participation.⁷ The PPP shall be prepared with the goal of providing stakeholders and other interested persons with periodic, meaningful opportunities to review, comment upon, and to influence

Commented [A73]: It is unreasonable to require Fox to comply with the requirements of three different agencies, which may impose conflicting requirements. In addition, although the Proposed Order cites to specific DTSC guidance, it does not specify with which EPA guidance Fox is to comply.

⁷ Public Participation Manual (DTSC, 2001) <https://dtsc.ca.gov/get-involved/policies-procedures-public-participation-program/>

investigation and cleanup activities. The PPP shall include the following, at a minimum:

- i) Procedures to be implemented to communicate water quality testing results in writing to:
 - (1) All owners of all impaired, impacted, or threatened water supply wells within the regional PCE plume, and
 - (2) Relevant regulatory agencies (e.g., Lahontan Water Board and El Dorado County Department of Public Health). Procedures shall consider the need for materials to be provided in languages other than English.
- ii) Community involvement strategies to be used, such as use of fact sheets, plans to conduct community meetings or workshops, and establishing an information repository.
- iii) Procedures to be implemented to address the public participation requirements for each IRAP and RAP implementation stage.
 - (1) The following tasks shall be completed by the deadlines in Attachment C, Time Schedule:
 - (a) Submit a baseline community assessment.
 - (b) Submit an interested persons contact list.
 - (c) Submit a draft fact sheet that provides information, appropriately targeted to the literacy and translational needs of the community, about the investigation and remedial activities concerning the discharges of waste at the Site.
- iv) Public participation activities shall coincide with key decision-making points throughout the process as specified or as directed by the Executive Officer.
- v) A PPP, reasonably acceptable to the Executive Officer, shall be submitted in conformance with the requirements in Attachment C, Time Schedule.
- vi) Scheduling, implementation, completion, and reporting of all PPP related activities required in this Order shall be conducted in

conformance with the requirements detailed in Attachment C, Time Schedule.

9) Conduct Monitoring

Implement a groundwater and remediation system performance monitoring program as set forth in Attachment E.

10) Time Schedule

The ~~Dischargers~~ Respondents shall submit all required work plans and reports and complete work within the schedule in ~~any approved work plan or IRAP~~ and the time schedule set forth in Attachment C, Time Schedule attached hereto and incorporated herein by reference, as extended by any approved work plan or IRAP or which may be revised by the Executive Officer at his/her discretion. Now

Commented [A74]: If the Regional Board approves a later deadline in a work plan, that should control over Schedule C. In addition, the Regional Board should be able to extend deadlines but not shorten them.

OTHER REQUIREMENTS AND SPECIFICATIONS

11) Authorized Inspection and Entry

To the extent allowed by law, each Respondent shall provide the Lahontan Water Board's authorized representative(s) ~~shall be allowed permission to:~~

- a. Entry upon premises owned by such Respondent where a regulated facility or activity is located, conducted, or where records are stored, under the conditions of this Order;
- b. Access to copy any records that are stored under the conditions of this Order;
- c. Access to inspect any facility owned by such Respondent and any equipment (including monitoring and control equipment), practices, or operations conducted by Respondent regulated or required under this Order; and
- d. The right to photograph, sample, and monitor the Site and/or off-Site work equipment and infrastructure for the purpose of ensuring compliance with this Order, or as otherwise authorized by the California WC.

Commented [A75]: Fox does not own any of the real property addressed by this Proposed Order and has no authority to grant access to it. The Proposed Order should be revised to clarify that the Regional Board will rely on its statutory authority for access to properties not owned by Respondents.

Commented [A76]: Fox cannot authorize access to other people's records.

Commented [A77]: Fox does not own any of the real property addresses by this Proposed Order and has no authority to grant access to it. The Proposed Order should be revised to clarify that the Regional Board will rely on its statutory authority for access to properties not owned by Respondents.

12) Contractor/Consultant Qualification

As required by the Business and Professions Code sections 6735, 7835, and 7835.1, all reports shall be prepared by, or under the supervision of, an appropriately experienced California registered professional civil engineer or geologist and signed by the registered professional. All technical reports submitted

Commented [A78]: Fox cannot authorize the Regional Board to take photos of other people's property.

by the ~~Discharger~~Respondent(s) shall include a statement signed by the authorized representative certifying under penalty of law that the representative has examined and is familiar with the report and that to his knowledge, the report is true, complete, and accurate. All technical documents shall be signed by and stamped with the seal of the above-mentioned qualified professionals that reflects a license expiration date.

13) Compliance with All Laws and Requirements

This Order is not intended to permit or allow the ~~Respondent~~Discharger(s) to cease any work required by any other Order issued by the Lahontan Water Board, nor shall it be used as a reason to stop or redirect any investigation or cleanup or remediation programs ordered by the Lahontan Water Board or any other agency. Furthermore, this Order does not exempt the ~~Discharger~~Respondent(s) from compliance with any other laws, regulations, or ordinances which may be applicable, nor does it legalize these waste treatment and disposal facilities, and it leaves unaffected any further restrictions on those facilities which may be contained in other statutes or required by other agencies.

14) Notice of Changed Name or Ownership

The ~~Discharger~~Respondent(s) Seven Springs shall submit a notice to the Lahontan Water Board 30-days in advance of any planned changes in name, ownership, or control of the Site and shall provide a notice to the Lahontan Water Board 30-days in advance of any planned physical changes to the Site that may affect compliance with this Order. In the event of a change in ownership or operator, the ~~Discharger~~Respondent Seven Springs(s) also shall provide a notice 30 days in advance, by letter, to the succeeding owner/operator of the existence of this Order, and shall submit a copy of this advance notice to the Lahontan Water Board. Transfer of ownership does not automatically transfer responsibility for the requirements in this Order.

Commented [A79]: Fox does not own or operate the Site, so this requirement should not apply to it.

15) Well Abandonment Approval

Abandonment of any groundwater well(s) utilized in the Groundwater MRP must be approved by and reported to the Lahontan Water Board at least 30 days in advance. If, in the Executive Officer's reasonable judgment, any removed groundwater well is necessary to monitor the discharge of waste, the well must be replaced within 90 calendar days, at a location approved by the Lahontan Water Board. With written justification, the Lahontan Water Board may approve the abandonment of groundwater wells without replacement. When a well is removed, all abandonment work shall be completed in accordance with California Department of Water Resources Bulletin 74-90, "California Well Standards," Monitoring Well Standards Chapter, Part III, Sections 16-19.

Commented [A80]: Fox does not own any of these wells or the properties on which they sit. It is unreasonable for the Regional Board to require Fox to perform work on property to which it does not have access, or to replace wells that are destroyed by others.

16) **Extensions**

In the event compliance cannot be achieved within the terms of this Order, the Dischargers/Respondents have the opportunity to request, in writing, an extension of the time specified. The extension request shall include an explanation why the specified date could not or will not be met and justification for the requested period of extension. Any extension request shall be submitted as soon as the situation is recognized and no later than the compliance date. Extension requests not approved in writing with reference to this Order are denied.

17) **Delegated Authority to the Executive Officer**

The Lahontan Water Board, through its Executive Officer, may, after providing reasonable notice and an opportunity to Respondents to comment, revise this Order as additional information becomes available. Upon request by the Dischargers/Respondents, and for good cause shown, the Executive Officer may defer, delete or extend the date of compliance for any action required of the Dischargers/Respondents under this Order. The authority of the Lahontan Water Board, as contained in the California WC, to order investigation and cleanup, in addition to that described herein, is in no way limited by this Order.

Reference herein to determinations and considerations to be made by the Lahontan Water Board regarding the terms of the Order shall be made by the Executive Officer or his/her designee. Decisions and directives made by the Executive Officer with respect to this Order shall be as if made by the Lahontan Water Board.

18) **Continue Uninterrupted Cleanup and Abatement**

The Dischargers/Respondents shall continue to implement any required remediation or monitoring activities until such time as the Executive Officer determines that sufficient cleanup has been accomplished and this Order has been rescinded.

Commented [A81]: This provision should be modified to establish a meaningful endpoint to the Order. As drafted, the Proposed Order is completely open-ended.

19) **Cost Reimbursement**

The Dischargers/Respondents shall reimburse the Lahontan Water Board for the reasonable costs actually incurred in associated with oversight/supervising of the investigation and cleanup and abatement of the waste at or emanating from the Site.

Commented [A82]: Revised to more closely track the language in 13304(c) quoted above.

20) **Reports Submitted Under Penalty of Law**

The Lahontan Water Board, under the authority given by WC section 13267, subdivision (b)(1), requires you/Respondents to include a statement in all reports

submitted under this Order signed by a senior authorized representative (not by a consultant). The statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

21) **Electronic Submission of Reports**

On September 30, 2004, the State Water Board adopted the resolution to revise regulations in Chapter 30, Division 3 of Title 23 of CCR, which requires persons to ensure electronic submission of laboratory analytical data (i.e., soil, soil vapor, or groundwater chemical analysis) and locational data (i.e., location and elevation of groundwater monitoring wells) via the Internet to the State Water Board's GeoTracker database. You must upload all available Electronic submittal of information (ESI) concerning the Site to the State Water Board's GeoTracker database: the report (in PDF format), laboratory analytical data (in electronic data format [EDF]), monitoring event information in GEO_WELL format, an updated site map (GEO_MAP) showing any new monitoring well locations, boring logs in PDF (GEO_BORE) to be used to link to well locations, monitoring well latitude and longitude (GEO_XY) survey data, and monitoring well elevation data (GEO_Z). Hard copy paper reports, which have already been electronically uploaded to GeoTracker, are no longer required to be submitted to the Water Board. The regulations and other background information are available at <https://geotracker.waterboards.ca.gov>

22) **Enforcement**

Failure to comply with the terms or conditions of this Order may result in imposition of civil liabilities, imposed either administratively by the Lahontan Water Board or judicially by the Superior Court in accordance with Water Code sections 13268, 13304, 13308, and/or 13350, and/or referral to the Attorney General of the State of California.

23) **Bankruptcy**

None of the obligations imposed by this Order on the Dischargers are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations are imposed pursuant to the police powers of the State of California intended to protect the public health, safety, welfare, and environment.

Ordered by: _____ Date: _____

MICHAEL PLAZIAK, P.G.

EXECUTIVE OFFICER

EXHIBIT D

I. LAKE TAHOE LAUNDRY WORKS (SL0601754315) - (MAP)

[LAKE TAHOE LAUNDRY WORKS \(SL0601754315\) \(MAP\)](#)

1024 LAKE TAHOE BOULEVARD
SOUTH LAKE TAHOE, CA 96150
EL DORADO COUNTY

CLEANUP OVERSIGHT AGENCIES
LAHONTAN RWQCB (REGION 6T) (LEAD) - CASE #: T6S043
CASEWORKER: BRIAN GREY

[CLEANUP PROGRAM SITE \(INFO\)](#)

[EL DORADO COUNTY](#)

A. Regulatory Activities

LINK	ACTION TYPE	ACTION	ACTION DATE	RECEIVED / ISSUE DATE	TITLE /DESCRIPTION / COMMENTS
[VIEW DOCS]	Other Regulatory Actions	Meeting	8/22/2022	8/22/2022	Meeting between Water Board and Seven Springs legal counsel re Stipulation re Administrative Record email.
[VIEW DOCS]	Enforcement/Orders	Deadline Extension	8/19/2022	8/19/2022	Comment Period Extended Comment period extended to September 19
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	8/19/2022	8/19/2022	email re stipulation re administrative record
	Response Requested - Other	Email Correspondence - Regulator Email	8/17/2022	8/17/2022	email re LTLW-Extension request renewal
[VIEW DOCS]	Response Requested - Other	Correspondence - Regulator	8/17/2022	8/17/2022	Stipulation Re Administrative Record
[VIEW DOCS]	Enforcement/Orders	Response to Comments	7/28/2022	7/28/2022	Request for Technical Reports, Laboratory Data, and Comment Period Extension Comment period deadline remains August 23, 2022
[VIEW DOCS]	Response Requested - Other	Email Correspondence	7/28/2022	7/28/2022	Email from Seven Springs confirming receipt of files
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	7/27/2022	7/27/2022	email transmittal to Seven Springs and Fox Capital Management Corporation of requested files
[VIEW DOCS]	Response Requested - Other	Public Comment - Regulator Responded	7/25/2022	7/25/2022	email from Seven Springs re Seven Springs Request for AECOM Documents and Laboratory Data re Proposed CAOs - requests documents referenced in Attachment B of the proposed CAO, laboratory data from Regional Board's soil gas investigation, and an extension to the comment period contingent on production of the soil gas data.
[VIEW DOCS]	Enforcement/Orders	Deadline Extension	6/27/2022	6/27/2022	Comment Period Extended Comment period extended to August 23, 2022
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	6/27/2022	6/27/2022	Email string with Reisch regarding records request, transfer, and receipt of files
[VIEW DOCS]	Response Requested - Other	Public Comment - Regulator Responded	6/24/2022	6/24/2022	email transmittal from Seven Springs re Request for Comments-Cleanup and Abatement Orders R6T-2022-(Proposed) for the LTLW, Former Big O Tires, and Former Noma's Cleaners Sites - request for (1) copies of the supporting documents referenced in the proposed Cleanup and Abatement Order (CAO) for Lake Tahoe Laundry Works and (2) an extension to the comment period for proposed CAOs for Lake Tahoe Laundry Works, Big O Tires, and Former Norma's Cleaners
[VIEW DOCS]	Response Requested - Other	Public Comment - Regulator Responded	6/22/2022	6/22/2022	email transmittal re Fox's Requests re Proposed CAOs - request for (1) copies of the supporting documents referenced in the proposed Cleanup and Abatement Order (CAO) for Lake Tahoe Laundry Works and (2) an extension to the comment period for proposed CAOs for Lake Tahoe Laundry Works, Big O Tires, and Former Norma's Cleaners
[VIEW DOCS]	Enforcement/Orders	Clean-up and Abatement Order	6/16/2022	6/16/2022	Request for Comments- Cleanup and Abatement Order R6T-2022-(PROPOSED)
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	6/15/2022	6/15/2022	First Quarter 2022 Monitoring Report

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	Response Requested - Other	Email Correspondence	5/10/2022	5/10/2022	Email from Pete Gorman of PES Environmental re LTLW PPRs Will be suspending submittal of Planning and Progress Reports until further warranted.
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	5/4/2022	5/4/2022	Planning and Progress Report No. 63
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	4/5/2022	4/5/2022	Planning and Progress Report No. 62
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	3/15/2022	3/15/2022	Fourth Quarter 2021 Monitoring Report
[VIEW DOCS]	Response Requested - Other	Public Comment	3/11/2022	3/11/2022	SSLP Comments on STPUD's Draft Alternative Plan for Tahoe Valley South Subbasin (6-005.01) First Five Year Update
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	3/10/2022	3/10/2022	Email re Lahontan Water Board Staff Acknowledgement of December 20, 2021 Response Letter. Indicates public comment period for draft general order for in-situ and ex-situ groundwater remediation projects is from March 11 to April 12, 2022. Provides link to draft general order.
	Other Regulatory Actions	Verbal Communication	3/9/2022	3/9/2022	Telephone conversation with Kyle Flory of PES Environmental re Indoor Air Sampling Work Plan
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	3/9/2022	3/9/2022	Planning and Progress Report No. 61
[VIEW DOCS]	Response Requested - Other	Email Correspondence	3/2/2022	3/2/2022	Email re SCP Invoice No. SC 128518, Account No. 2060012-Jan 21, 2022 Notice
[VIEW DOCS]	Response Requested - Workplans	Other Workplan	2/25/2022	2/22/2022	Revised Indoor Air Sampling Work Plan dated February 22, 2022
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	2/22/2022	2/22/2022	Email string re Planning and Progress Report No 60 (Revision 2). Email string includes transmittal of Planning and Progress Report No. 60 (Revision 2)
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	2/17/2022	2/17/2022	Email regarding PPR No. 60 Revised. Provides clarification of PPR No 60 revisions.
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	2/16/2022	2/16/2022	Planning and Progress Report No. 60 (Revised)
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	2/7/2022	2/7/2022	Planning and Progress Report No. 60
[VIEW DOCS]	Response Requested - Other	Email Correspondence	1/28/2022	1/28/2022	Email string re Request for EVS Model Prepared for South Y Investigation
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	1/26/2022	1/26/2022	Email to Tarantino re status of draft general order
[VIEW DOCS]	Response Requested - Other	Email Correspondence	1/26/2022	1/26/2022	Email from Tarantino re Request for Meeting-Remediation at the Lake Tahoe Laundry Works Site and the Tahoe Valley south Basin
	Other Regulatory Actions	Meeting	1/13/2022	1/13/2022	Technical conference call with PES
[VIEW DOCS]	Response Requested - Other	Email Correspondence	1/11/2022	1/11/2022	Email from Pete Gorman of PES re Request for EVS Model Prepared for South Y Investigation
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	1/11/2022	1/11/2022	Planning and Progress Report No. 59
[VIEW DOCS]	Other Regulatory Actions	Staff Letter	1/7/2022	1/7/2022	Water Board response to William Tarantino email dated December 20, 2021
[VIEW DOCS]	Response Requested - Other	Email Correspondence	12/20/2021	12/20/2021	Email from William Tarantino re Updated Comments- Lake Tahoe Laundry Works Remediation Evaluation Work Plan Case No. T6S043

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Meeting	12/16/2021	12/16/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	12/15/2021	12/15/2021	Third Quarter 2021 Monitoring Report
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	12/14/2021	12/14/2021	Planning and Progress Report No. 58
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/29/2021	11/29/2021	Email string with Justin Fisch regarding Comments on Remediation Evaluation Work Plan and draft general order for in-situ groundwater remediation projects.
	<i>Other Regulatory Actions</i>	Meeting	11/18/2021	11/18/2021	Technical conference call
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	11/16/2021	11/16/2021	Notice of Deficient Workplan (Indoor Air Sampling Work Plan)
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	11/16/2021	11/16/2021	Email from Andy Safford of EKI transmitting Comments on AECOM Soil Gas Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	11/16/2021	11/16/2021	Planning and Progress Report No. 57
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	11/16/2021	11/16/2021	Notice of Deficient Workplan (Remediation Evaluation Workplan)
	<i>Other Regulatory Actions</i>	Meeting	10/21/2021	10/21/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/19/2021	10/19/2021	Progress and Planning Report No. 56
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	10/14/2021	10/14/2021	Email from Pete Gorman of PES re Hurzel Site-PES Comments
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil Vapor Intrusion Investigation Workplan	9/27/2021	9/27/2021	Indoor Air Sampling Work Plan
	<i>Other Regulatory Actions</i>	Meeting	9/23/2021	9/23/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	9/21/2021	9/21/2021	Progress and Planning Report No. 55
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	9/19/2021	9/19/2021	Email from Flory of PES Environmental, Inc., re: Former Big O Tires Site -PES Comments on Draft Agenda
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	9/16/2021	9/16/2021	Second Quarter 2021 Groundwater Monitoring Report
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Pilot Study / Treatability Workplan	9/7/2021	9/7/2021	Remediation Evaluation WorkPlan for Chlorinated VOCs in Middle Zone Groundwater
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	8/20/2021	8/20/2021	Email from Scott Reisch transmitting Powerpoint presentation given to legal counsel on 8/19 and Hakansson affidavit.
	<i>Other Regulatory Actions</i>	Meeting	8/19/2021	8/19/2021	Legal counsel meeting (Representatives from Fox, Seven Springs, OCC, OE, and DAG)
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	8/18/2021	8/18/2021	Email String between July 23 and August 19, 2021 regarding a request for meeting.
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	8/15/2021	8/15/2021	Email from Flory transmitting Comments on STPUD Responsiveness Summary dated June 12, 2020
	<i>Other Regulatory Actions</i>	Meeting	7/29/2021	7/29/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	7/27/2021	7/27/2021	Progress and Planning Report No. 53

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Meeting	7/1/2021	7/1/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	6/29/2021	6/29/2021	Planning and Progress Report No. 52
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	6/15/2021	6/15/2021	FIRST QUARTER 2021 MONITORING REPORT
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	6/8/2021	6/8/2021	Email from Kyle Flory of PES Environmental re BOT-WHA Revised Phase 2 Work Plan
	<i>Other Regulatory Actions</i>	Meeting	6/3/2021	6/3/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	6/1/2021	6/1/2021	Progress and Planning Report No. 51
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	5/14/2021	5/14/2021	Comments on RMC Geoscience, Inc. Soil Vapor Probe Investigation Report, Hurzel Properties, LLC.
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	5/14/2021	5/14/2021	Response to Weiss Associates Comments Regarding South Y Basin Aquifer PCE South Lake Tahoe, California
	<i>Other Regulatory Actions</i>	Meeting	5/6/2021	5/6/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	5/4/2021	5/4/2021	Progress and Planning Report No. 50
	<i>Other Regulatory Actions</i>	Meeting	4/8/2021	4/8/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	4/6/2021	4/6/2021	Planning and Progress Report No. 49
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	4/1/2021	4/1/2021	RE: Submission of reports for Lake Tahoe Laundry Works (SSL0601754315)
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	3/15/2021	3/11/2021	Fourth Quarter 2020 Monitoring Report
	<i>Other Regulatory Actions</i>	Meeting	3/11/2021	3/11/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	3/9/2021	3/9/2021	Planning and Progress Report No. 48
	<i>Other Regulatory Actions</i>	Meeting	2/12/2021	2/12/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	2/9/2021	2/9/2021	Planning and Progress Report No. 47
	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	2/9/2021	2/9/2021	Planning and Progress Report No. 47
	<i>Other Regulatory Actions</i>	Meeting	1/14/2021	1/14/2021	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	1/12/2021	1/12/2021	Planning and Progress Report No. 46
	<i>Other Regulatory Actions</i>	Meeting	12/17/2020	12/17/2020	Technical conference call
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	12/17/2020	12/17/2020	Email string re SVE/GASS Operations Update
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	12/17/2020	12/17/2020	Email from Gorman re Preliminary ESI Follow-up

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	12/15/2020	12/15/2020	Progress and Planning Report No. 45
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	12/15/2020	12/15/2020	Third Quarter 2020 Monitoring Report
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/8/2020	12/8/2020	Ex Parte Minute Order (Seven Springs)
	<i>Other Regulatory Actions</i>	Meeting	11/19/2020	11/19/2020	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	11/17/2020	11/17/2020	Planning and Progress Report No 44
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/9/2020	11/9/2020	Seven Springs vs LWRQCB Final Ruling
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/28/2020	10/28/2020	Email to Flory re Electronic Submittal of Information (ESI) Issue Summary
	<i>Other Regulatory Actions</i>	Meeting	10/22/2020	10/22/2020	Technical conference call
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/21/2020	10/21/2020	email to Weiss Associates re acknowledgement of receipt of October 21, 2020 Comments on April 3, 2020 Investigation Summary Report and February 20, 2020 PES & EKI Letter
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/21/2020	10/21/2020	Weiss Associates email re South Y Technical Report submittal to the Lahontan Regional Water Quality Control Board Weiss Response to the April 3, 2020 Investigation Summary Report and February 20, 2020 PES & EKI Letter
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/20/2020	10/20/2020	Progress and Planning Report No. 43.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	10/2/2020	10/2/2020	Investigation Summary Report
	<i>Other Regulatory Actions</i>	Meeting	9/24/2020	9/24/2020	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	9/22/2020	9/22/2020	Planning and Progress Report No. 42
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/18/2020	9/18/2020	Seven Springs LP v Lahontan Regional Water Quality Control Board Tentative Ruling #1
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	9/15/2020	9/15/2020	Email from Scott Reisch requesting a copy of the El Dorado Superior Court's decision in Fox Capital Management Corp. v. Lahontan Regional Water Quality Board, (No. SC20170189, El Dorado Super. Ct.), dated June 1, 2020, be placed on Geotracker.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	9/15/2020	9/15/2020	Second Quarter 2020 Monitoring Report
	<i>Other Regulatory Actions</i>	Meeting	8/27/2020	8/27/2020	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	8/25/2020	8/25/2020	Planning and Progress Report No. 41
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/12/2020	8/12/2020	Email to Seven Springs and PES Environmental commenting on April 3, 2020 Investigation Summary Report and October 4, 2019 Investigation Summary Report
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	8/3/2020	8/3/2020	email string regarding issue with quarterly monitoring event. Rescheduled for August 12.
	<i>Other Regulatory Actions</i>	Meeting	7/30/2020	7/30/2020	Technical conference call

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	7/28/2020	7/28/2020	Progress and Planning Report #40
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	6/30/2020	6/30/2020	Planning and Progress Report No. 39
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	6/15/2020	6/15/2020	First Quarter 2020 Monitoring Report
	Other Regulatory Actions	Meeting	6/4/2020	6/4/2020	Technical conference call
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	6/2/2020	6/2/2020	Planning and Progress Report No. 38
[VIEW DOCS]	Other Regulatory Actions	Technical Correspondence / Assistance / Other	6/1/2020	6/1/2020	El Dorado Superior Court - Fox Capital vs LRWQCB Tentative Merits Ruling
[VIEW DOCS]	Response Requested - Reports	Interim Remedial Action Report	5/20/2020	5/21/2020	May 19, 2020 Limited In-Situ Chemical Oxidation Pilot Test Report of Findings
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	5/5/2020	5/5/2020	Planning and Progress Report No. 37
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	4/29/2020	4/29/2020	Acknowledgement of submittal email to Safford re: April 24, 2020 Supplemental Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS) and April 16, 2020 Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS)
[VIEW DOCS]	Response Requested - Other	Email Correspondence	4/16/2020	4/16/2020	Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS) - PES Environmental on behalf of Seven Springs Limited Partnership and Fox Capital Management Corporation
[VIEW DOCS]	Response Requested - Other	Email Correspondence	4/15/2020	4/15/2020	Email from PES (Gorman) re Draft ISCO Monitoring Results
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	4/10/2020	4/10/2020	Email to interested parties transmitting link to April 3, 2020 Investigation Summary Report
	Other Regulatory Actions	Meeting	4/9/2020	4/9/2020	Technical conference call
[VIEW DOCS]	Response Requested - Reports	Soil and Water Investigation Report	4/8/2020	4/8/2020	April 3, 2020 Investigation Summary Report
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	4/7/2020	4/7/2020	Planning and Progress Report No. 36
[VIEW DOCS]	Enforcement/Orders	Clean-up and Abatement Order	4/3/2020	4/3/2020	Schedule Extension CAO R6T 2017 0022
	Response Requested - Other	Email Correspondence - Regulator	3/31/2020	3/31/2020	Request for Extension CAO R6T 2017 0022
	Response Requested - Other	Other Report / Document	3/24/2020	3/24/2020	Weiss re-submittal of reports with stamps- February 13, 2019 and December 20, 2019 South Y Basin Aquifer
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	3/19/2020	3/19/2020	email string with Jed Borghei regarding report resubmittal
[VIEW DOCS]	Other Regulatory Actions	Staff Letter	3/18/2020	3/18/2020	Report Resubmittal letter - EKI/PES
[VIEW DOCS]	Response Requested - Other	Email Correspondence	3/18/2020	3/18/2020	Email from Flory re TWG 2 27 Meeting Notes and LBWC#4 Destruction
[VIEW DOCS]	Other Regulatory Actions	Staff Letter	3/18/2020	3/18/2020	Report Resubmittal letter-Weiss Associates

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	3/15/2020	3/16/2020	4th QMR 2019
	Other Regulatory Actions	Meeting	3/12/2020	3/12/2020	Technical conference call
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	3/10/2020	3/10/2020	Planning and Progress Report No. 35
[VIEW DOCS]	Other Regulatory Actions	Meeting	2/27/2020	2/27/2020	South Y PCE Technical Meeting - face to face technical meeting including water purveyors, city of SLT, state and regional water board, and consultants
[VIEW DOCS]	Other Regulatory Actions	Meeting	2/21/2020	2/21/2020	Face to face meeting with consultants and responsible party representatives
[VIEW DOCS]	Response Requested - Other	Other Report / Document	2/20/2020	2/20/2020	LTLWs Working Parties Response to Weiss Associates Letters Regarding South Y Basin Aquifer PCE
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	2/13/2020	2/13/2020	Planning and Progress Report No. 34
	Other Regulatory Actions	Meeting	1/16/2020	1/16/2020	Technical conference call
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	1/15/2020	1/15/2020	Planning and Progress Report No. 33
[VIEW DOCS]	Response Requested - Other	Other Report / Document	12/20/2019	12/20/2019	Letter from Weiss Associates Re: South Y Basin Aquifer PCE Comments from Weiss Associates submitted on behalf of Lukins Brothers Water Company in response to the October 4, 2019 Investigation Summary Report
	Other Regulatory Actions	Meeting	12/19/2019	12/19/2019	Technical conference call
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	12/17/2019	12/17/2019	Planning and Progress Report No. 32
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	12/11/2019	12/11/2019	Email response to November 19, 2019 Response to RWQCB's October 29, 2019 Comments Regarding the July 31, 2019 Workplan to Perform Limited In-Situ Chemical Oxidation Pilot Test from PES. Staff concurs with proposed work plan modifications and collection of depth to water and visual observations to evaluate oxidant distribution.
	Other Regulatory Actions	Meeting	11/21/2019	11/21/2019	Technical conference call
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	11/20/2019	11/20/2019	Email from Water Board to Working Parties re Data Sharing/Requests - South Y Regional PCE Investigation
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	11/19/2019	11/19/2019	Progress and Planning Report No. 31
[VIEW DOCS]	Response Requested - Other	Email Correspondence	11/19/2019	11/19/2019	Email from PES re: LTLW Response to Water Board October 29, 2019 Conditional Approval Letter
[VIEW DOCS]	Other Regulatory Actions	Staff Letter	10/29/2019	10/29/2019	Comments on July 31, 2019 Workplan to Perform Limited In-Situ Chemical Oxidation Pilot Test
[VIEW DOCS]	Response Requested - Reports	Progress Report (Soil/GW/ Updates)	10/29/2019	10/29/2019	Planning and Progress Report No. 30
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	10/24/2019	10/24/2019	SECOND QUARTER 2019 GROUNDWATER MONITORING REPORT
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	10/21/2019	10/21/2019	Email to interested parties re Link to October 4, 2019 Investigation Summary Report
[VIEW DOCS]	Other Regulatory Actions	Email Correspondence	10/21/2019	10/21/2019	Email from Jeff Brooks to Justin Fisch re South Y Information Sharing. Includes draft logs for Sonic 1 through 7 locations.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Meeting	10/10/2019	10/10/2019	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Assessment Report	10/9/2019	10/9/2019	Investigation Summary Report
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/8/2019	10/8/2019	Planning and Progress Report No. 29
[VIEW DOCS]	<i>Response Requested - Other</i>	Response to Comments	10/7/2019	10/7/2019	Response to Water Board Comments on LTLW Working Parties 1 April 2019 Investigation Summary Report
[VIEW DOCS]	<i>Enforcement/Orders</i>	Deadline Extension - #R6T-2017-0022	10/3/2019	10/3/2019	Schedule extension - Deadline of October 1, 2019 extended to October 4, 2019
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	10/2/2019	10/2/2019	email from Justin Fisch re data communication
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	9/23/2019	9/23/2019	Request to extend October 1, 2019 CAO deadline for report submittal to October 4, 2019
	<i>Other Regulatory Actions</i>	Meeting	9/19/2019	9/19/2019	Technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	9/17/2019	9/17/2019	Planning and Progress Report No. 28
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	9/9/2019	9/9/2019	Email to Justin Fisch re; May 30, 2019 meeting minutes
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	9/6/2019	9/6/2019	Comments on April 1, 2019 Investigation Summary Report
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	9/5/2019	9/5/2019	Email string regarding monitoring well construction details and data communication
	<i>Other Regulatory Actions</i>	Meeting	8/29/2019	8/29/2019	Technical conference call
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	8/27/2019	8/27/2019	Planning and Progress Report No. 27
	<i>Other Regulatory Actions</i>	Meeting	8/8/2019	8/8/2019	No technical conference call held
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	8/7/2019	8/7/2019	Planning and Progress Report No. 26
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Pilot Study / Treatability Workplan	7/31/2019	7/31/2019	Workplan to Perform Limited In-Situ Chemical Oxidation Pilot Test
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	7/23/2019	7/23/2019	Update from E2CR re July 5, 2019 water levels and SVE operation
	<i>Other Regulatory Actions</i>	Meeting	7/18/2019	7/18/2019	Technical conference call Next meeting scheduled for August 8
	<i>Other Regulatory Actions</i>	Meeting	7/16/2019	7/16/2019	Teleconference (Brian Grey, Andy Safford, Kyle Flory) to discuss yet to be submitted draft ISCO work plan to address remaining on-site contamination.
	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	7/16/2019	7/16/2019	Planning and Progress Report No. 25
	<i>Other Regulatory Actions</i>	Meeting	6/27/2019	6/27/2019	Technical conference call Next call scheduled for July 18
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	6/25/2019	6/25/2019	Planning and Progress Report No. 24
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	6/19/2019	6/19/2019	email re: missing lid and SVE operation/gw elevation updates

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	6/19/2019	6/19/2019	FIRST QUARTER 2019 MONITORING REPORT
	<i>Other Regulatory Actions</i>	Meeting	6/6/2019	6/6/2019	Biweekly conference call Next call scheduled for June 27
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	6/4/2019	6/4/2019	Planning and Progress Report No. 23
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/30/2019	5/30/2019	Face to face meeting with Lake Tahoe Laundry Works representatives and consultants
	<i>Other Regulatory Actions</i>	Meeting	5/23/2019	5/23/2019	Biweekly technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	5/21/2019	5/21/2019	Planning and Progress Report No. 22
	<i>Other Regulatory Actions</i>	Email Correspondence	5/14/2019	5/14/2019	Update to Interested Parties- Investigative Orders/May 13, 2019 South Y PCE Technical Meeting Presentations
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/13/2019	5/13/2019	South Y PCE technical meeting
	<i>Other Regulatory Actions</i>	Meeting	5/9/2019	5/9/2019	Biweekly technical conference call
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	5/7/2019	5/7/2019	Email from E2CR re groundwater levels and SVE system operation
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	5/7/2019	5/7/2019	Planning and Progress Report No. 21
	<i>Other Regulatory Actions</i>	Meeting	4/25/2019	4/25/2019	Bi-weekly technical conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Remedial Progress Report	4/23/2019	4/23/2019	Progress and Planning Report No. 20
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	4/19/2019	4/19/2019	Email from E2CR re LTLW water level measurements
	<i>Other Regulatory Actions</i>	Meeting	4/11/2019	4/11/2019	Bi-weekly conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Remedial Progress Report	4/9/2019	4/9/2019	Progress and Planning Report No 19
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	4/5/2019	4/5/2019	Email to Interested Parties re; Investigation Summary Report-Former Lake Tahoe Laundry Works
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Assessment Report	4/1/2019	4/1/2019	Investigation Summary Report
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence - Regulator Responded	4/1/2019	4/1/2019	Email from E2CR re LTLW SVE System Shut Down During High Water Email response from Lahontan Water Board E2CR will check water levels and provide brief email status reports on a biweekly basis until system can be turned back on.
	<i>Other Regulatory Actions</i>	Meeting	3/28/2019	3/28/2019	Bi-weekly conference call
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	3/26/2019	3/26/2019	DFA response to PES email re PRA request
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence - Regulator Responded	3/26/2019	3/26/2019	Email from PES to DFA re status of PRA request
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	3/25/2019	3/25/2019	Progress and Planning Report No. 18

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	3/18/2019	3/18/2019	FOURTH QUARTER 2018 MONITORING REPORT
	<i>Other Regulatory Actions</i>	Meeting	3/14/2019	3/14/2019	Lahontan Board meeting- presentations by Lake Tahoe Laundry Works, water purveyors, and Lahontan Water Board on status of PCE investigation efforts. No biweekly technical meeting held.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	3/12/2019	3/12/2019	Email from EKI transmitting Progress and Planning Report No. 17
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	3/7/2019	3/7/2019	email from PES to DFA re Public Records Act Request - Proposition 1 Groundwater Grant Funding for South Tahoe Public Utility District
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	3/5/2019	3/5/2019	email from STPUD to PES re South Y Sewer Line CCTV Survey - DRAFT Reimbursement Agreement
	<i>Other Regulatory Actions</i>	Meeting	2/28/2019	2/28/2019	Bi weekly conference call
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/28/2019	2/28/2019	Email from STPUD to PES re request for access- South Y Sewer Line CCTV Survey.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/27/2019	2/27/2019	Email from PES to STPUD RE: Request for Access - South Y Sewer Line CCTV Survey
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/27/2019	2/27/2019	Email from EKI re borehole logs. EKI requesting information related to Tahoe Asphalt and USA Gasoline sites. Email string to 3/8/19- contains requested and additional information related to initial request
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/26/2019	2/26/2019	Email from STPUD to PES RE: Request for Access - South Y Sewer Line CCTV Survey. Contains proposed approach to Glorene area sewer investigation.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	2/26/2019	2/26/2019	Email from EKI transmitting PPR No 16
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	2/14/2019	2/14/2019	Email to STPUD re Request for Access- South Y Sewer Line CCTV Survey
	<i>Other Regulatory Actions</i>	Meeting	2/14/2019	2/14/2019	Bi-weekly conference call
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/13/2019	2/13/2019	Weiss Associates- Comments on Cleanup and Abatement Order (CAO) R6T-2017-0022
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	2/12/2019	2/12/2019	Progress and Planning Report No. 15
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/11/2019	2/11/2019	Email from STPUD re Request for Access- South Y Sewer Line CCTV Survey
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	2/6/2019	2/6/2019	Face to face meeting
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	2/1/2019	2/1/2019	Comments on Progress and Planning Report No. 14
	<i>Other Regulatory Actions</i>	Meeting	1/31/2019	1/31/2019	Bi-weekly conference call
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	1/29/2019	1/29/2019	Progress and Planning Report No. 14
	<i>Other Regulatory Actions</i>	Meeting	1/24/2019	1/24/2019	Bi-weekly conference call (rescheduled from 1/17)
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	1/15/2019	1/15/2019	Progress and Planning Report No. 13

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/14/2019	1/14/2019	Request for Assistance with Access. Former Big O, 1961 Lake Tahoe Boulevard
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	1/4/2019	1/4/2019	Revised Progress and Planning Report No. 12
	<i>Other Regulatory Actions</i>	Meeting	1/3/2019	1/3/2019	Bi-weekly progress and planning meeting
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	1/2/2019	1/2/2019	Progress Planning Report No. 12
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	12/21/2018	12/21/2018	Email from STPUD (Stanley) transmitting response to PES's request for sewer access. Includes attachments from 1990s sewer line investigations.
	<i>Other Regulatory Actions</i>	Meeting	12/20/2018	12/20/2018	Bi-weekly progress and planning meeting
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	12/18/2018	12/18/2018	3Q 2018 Groundwater Monitoring Report and Current Site Remediation Status Report
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	12/18/2018	12/18/2018	Progress and Planning Report No. 11
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	12/17/2018	12/17/2018	Email providing comments on the December 6, 2018 Meeting Notes and December 5, 2018 Historical Groundwater Elevation Assessment
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	12/12/2018	12/12/2018	Email from Hoeffy re LTLW Meeting Notes December 6 call
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	12/11/2018	12/11/2018	Email string with PES (Gorman) re PPR/Call Schedule and Passive Soil Vapor Work
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	12/11/2018	12/11/2018	Email from PES to STPUD re South Y Area-Access to Sanitary Sewer for CCTV Video Survey
	<i>Other Regulatory Actions</i>	Meeting	12/6/2018	12/6/2018	Progress and Planning Meeting No. 10
[VIEW DOCS]	<i>Response Requested - Reports</i>	Technical Memos	12/5/2018	12/5/2018	Phase I Historical Groundwater Elevation Assessment
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	12/4/2018	12/4/2018	Progress and Planning Report No 10
	<i>Other Regulatory Actions</i>	Meeting	11/29/2018	11/29/2018	Progress and Planning Meeting No. 9
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/28/2018	11/28/2018	Email from PES (Flory) providing request for site access letters discussed in PPR No 9
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	11/27/2018	11/27/2018	Progress and Planning Report No. 9
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	11/20/2018	11/20/2018	Progress and Planning Report No. 8
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/19/2018	11/19/2018	Comments on Progress and Planning Report No 7 and OS Well Groundwater Results
	<i>Other Regulatory Actions</i>	Meeting	11/15/2018	11/15/2018	Progress and Planning Meeting No. 7
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	11/13/2018	11/13/2018	Progress and Planning Report No. 7
	<i>Other Regulatory Actions</i>	Meeting	11/8/2018	11/8/2018	Combined face to face/weekly technical meeting (Progress and Planning Meeting No. 6) with Lake Tahoe Laundry Works responsible parties and consultants

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/7/2018	11/7/2018	Preferential Pathway Evaluation Work Plan Stage 1- Closed Circuit Television Survey DVD
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	11/6/2018	11/6/2018	Progress and Planning Report No. 6
	<i>Other Regulatory Actions</i>	Meeting	11/1/2018	11/1/2018	Progress and Planning Meeting No. 5
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	10/31/2018	10/31/2018	Email string between PES/Lahontan regarding scheduling face to face technical meeting
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/30/2018	10/30/2018	Email string between Reisch and Ferguson re: Comments on Weekly Planning and Progress Reports with Request for Face to Face Technical Meeting
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/30/2018	10/30/2018	Progress and Planning Report No. 5
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/29/2018	10/29/2018	Comments on Weekly Planning and Progress Reports with Request for Face to Face Technical Meeting
	<i>Other Regulatory Actions</i>	Meeting	10/25/2018	10/25/2018	Progress and Planning Meeting No. 4
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/23/2018	10/23/2018	Progress and Planning Report No. 4
	<i>Other Regulatory Actions</i>	Meeting	10/18/2018	10/18/2018	Progress and Planning Meeting No. 3
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/17/2018	10/17/2018	Progress and Planning Report No. 2 Revised
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/16/2018	10/16/2018	Comments on Weekly Progress Reports, Preferential Pathway Evaluation Work Plan, and Revised Preliminary Planning Report and Progress and Planning Schedule
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/16/2018	10/16/2018	Progress and Planning Report No. 3
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/12/2018	10/12/2018	email re: Correction to Invoice SC-109397
	<i>Other Regulatory Actions</i>	Meeting	10/11/2018	10/11/2018	Progress and Planning meeting No. 2
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/9/2018	10/9/2018	Progress and Planning Report No. 2
	<i>Other Regulatory Actions</i>	Meeting	10/5/2018	10/5/2018	Progress and Planning Meeting. Attendees: Andy Safford, Peter Gorman, Kyle Flory, Paul Hoffey, and Brian Grey. Future Progress and Planning Reports will be submitted by the end of the day Tuesday with a weekly meetings held on Tuesdays at 11AM.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/1/2018	10/1/2018	Email to Interested Parties - September 28, 2018 Preferential Pathway Evaluation Work Plan
[VIEW DOCS]	<i>Response Requested - Reports</i>	Progress Report (Soil/GW/ Updates)	10/1/2018	10/1/2018	Progress and Planning Report No. 1 and Revised Preliminary Planning Report and Progress and Planning Schedule
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan	9/28/2018	9/28/2018	Preferential Pathway Evaluation Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	9/28/2018	9/28/2018	Email from Scott Reisch re: September 21, 2018 teleconference follow-up and discussion summary
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	9/25/2018	9/25/2018	September 21, 2018 teleconference follow-up and discussion summary.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	9/24/2018	9/24/2018	2Q 2018 Groundwater Monitoring Report and Current Site Remediation Status Report
	<i>Other Regulatory Actions</i>	Meeting	9/21/2018	9/21/2018	Teleconference with Fox, Seven Springs, PES, and EKI representatives to discuss the Preliminary Planning Report and Planning and Progress Reporting Schedule.
[VIEW DOCS]	<i>Enforcement/Orders</i>	Deadline Extension	9/20/2018	9/20/2018	Schedule Extension-Preferential Pathway Evaluation
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence - Regulator Responded	9/18/2018	9/18/2018	LTLW- Request for Extension re Preferential Pathway Evaluation
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan - Addendum	9/14/2018	9/14/2018	Preliminary Planning Report and Progress and Planning Report Schedule
[VIEW DOCS]	<i>Enforcement/Orders</i>	Deadline Extension	9/10/2018	9/10/2018	Schedule Extension- Preliminary Planning Report and Progress and Planning Report Schedule
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence - Regulator Responded	9/6/2018	9/6/2018	re: LTLW Conditional Acceptance Letter - Request for Extension
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/31/2018	8/31/2018	Teleconference follow-up email to LTLW RPs/consultants
	<i>Other Regulatory Actions</i>	Meeting	8/31/2018	8/31/2018	Teleconference with RPs and consultants to discuss "Suggestions for Compliance" document.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Annual Estimation Letter	8/27/2018	8/27/2018	2018-19 Annual Estimation Letter
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/23/2018	8/23/2018	Email to interested parties- August 22, 2018 Conditional Acceptance of March 19, 2018 Amended Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/23/2018	8/23/2018	Email to responsible parties transmitting suggestions for compliance
[VIEW DOCS]	<i>Enforcement/Orders</i>	Clean-up and Abatement Order	8/22/2018	8/22/2018	Conditional Acceptance of March 19, 2018 Amended Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Arbitration/Dispute Resolution	6/25/2018	6/25/2018	Correction to Invoice Number SC-109397
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	6/15/2018	6/14/2018	1Q 2018 Groundwater Monitoring Report and Current Site Remediation Status Report
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/23/2018	5/23/2018	Face to face meeting with Lake Tahoe Laundry Works responsible parties and consultants
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	5/11/2018	5/11/2018	South Tahoe Public Utility District's Comments on the Amended Groundwater Investigation Work Plan dated May 10, 2018
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	5/11/2018	5/11/2018	Joint submittal from Lukins Brothers, South Tahoe PUD, and Tahoe Keys POA re: suggested list of conditions to require in conjunction with the Lake Tahoe Laundry Work's Amended Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/9/2018	5/9/2018	Teleconference with Working Parties and consultants regarding SB445 draft scope of work
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/9/2018	5/9/2018	Meeting with water purveyors to discuss draft SB445 scope of work
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/3/2018	5/3/2018	Meeting with STPUD, Lukins, TKPOA, and City of SLT

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	4/11/2018	4/11/2018	April 11, 2018 Comments on Amended Groundwater Investigation Work Plan submitted by TRC Solutions, Inc. on behalf of Lukins Brothers Water Company, Inc.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	3/21/2018	3/21/2018	Email to interested parties transmitting printable and searchable copy of Amended Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Site Investigation Workplan	3/19/2018	3/19/2018	March 19, 2018 Amended Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	3/16/2018	3/16/2018	4Q 2017 Groundwater Monitoring Report and Current Site Remediation Status Report
	<i>Other Regulatory Actions</i>	Meeting	2/28/2018	2/28/2018	Meeting with Fox, Seven Springs, EKI, and PES to discuss path forward and March 19, 2018 work plan submittal.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Annual Estimation Letter	2/20/2018	2/20/2018	2017-18 Annual Estimation Letter
[VIEW DOCS]	<i>Enforcement/Orders</i>	Clean-up and Abatement Order	2/1/2018	2/1/2018	Notice of Continued Non-Compliance with Cleanup and Abatement Order (CAO) No. R6T-2017-0022
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	1/24/2018	1/24/2018	Meeting with Fox, Seven Springs, PES, and EKI to discuss response to Revised Groundwater Investigation Work Plan and path forward.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	1/23/2018	1/23/2018	LTLW - Materials for January 24, 2018 Meeting
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	1/12/2018	1/12/2018	Email to interested parties - January 11, 2018 Responses to Comments Regarding Revised Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	1/11/2018	1/11/2018	Email from EKI Environment & Water containing January 11, 2018 Responses to Comments Regarding Revised Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/29/2017	11/29/2017	Email from PES regarding groundwater investigation schedule
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/10/2017	11/10/2017	Email from Fox and Seven Springs regarding AS/SVE shutdown
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/10/2017	11/10/2017	Email string from PES regarding drilling issues and scheduling
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/9/2017	11/9/2017	Email response from Bras regarding batch pumping and schedule
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/7/2017	11/7/2017	Email to PES regarding batch pumping
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/3/2017	11/3/2017	Email response to 10 31 2017 PES email regarding November 15 deadline
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/3/2017	11/3/2017	Storm Drain Information
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/3/2017	11/3/2017	Email to E2CR regarding batch pumping schedule
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/3/2017	11/3/2017	Email to interested parties regarding Storm Drain System Information upload to Geotracker
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	10/31/2017	10/31/2017	Email from PES re: LTLW-Schedule of Field Activities for Groundwater Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/24/2017	10/24/2017	Ground Zero - Additional Information and comments on the September 11, 2017 EKI Revised Groundwater Investigation Workplan

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Verbal Communication	10/10/2017	10/10/2017	Received call from Pete Gorman (415 899-1600) of PES Environmental regarding "Phase I Investigation". Indicated earliest driller availability is November 6 (Cascade) or November 20 (Gregg; preferred). Consequently, likely won't have lab results by due date. Confirmed with Pete that PES began driller scheduling the week of September 25 and explored alternative drillers to Gregg later in the week.
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/10/2017	10/10/2017	Tahoe Keys Property Owners Association -Comments on the September 11, 2017 EKI Revised Groundwater Investigation Workplan
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/10/2017	10/10/2017	South Tahoe Public Utility District's Comments on the Revised Groundwater Investigation Workplan
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/10/2017	10/10/2017	Lukins Brothers Water Company- Supplemental Comments on Revised Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	9/28/2017	9/28/2017	Acceptance of extension request to submit comments on Revised Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/27/2017	9/27/2017	Lukins Brothers Water Company - Comments on Revised Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	9/20/2017	9/20/2017	Notification of batch pumping initiation
[VIEW DOCS]	<i>Enforcement/Orders</i>	Clean-up and Abatement Order	9/15/2017	9/15/2017	Conditional Acceptance of Tasks in July 26, 2017 Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan - Regulator Responded	9/11/2017	9/11/2017	Revised Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Other	9/1/2017	9/1/2017	August 30 2017 Off-Site Groundwater Investigation Data Report
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	8/24/2017	8/24/2017	PCE Results from Off-site Monitoring Wells, Spring 2017 Letter to local water purveyors contains PCE groundwater results from monitoring well sampling on the north side of the Tahoe South Y intersection, conducted by Water Board staff in spring 2017.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	8/23/2017	8/23/2017	Public Information Meeting Lake Tahoe Laundry Works CAO R6T-2017-0022/Regional PCE Pollution
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	8/22/2017	8/22/2017	Meeting with responsible parties and consultant to discuss revised work plan and public information meeting. Fox/Seven Springs will provide response to comments to implement work plan tasks and draft revised work plan.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	8/11/2017	8/11/2017	Notice of Incomplete Submittal with Request for Revised Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Respond to Petition	8/7/2017	8/7/2017	State Water Board Response to Fox Capital Management Corporation Petition to R6T-2017-0022
[VIEW DOCS]	<i>Response Requested - Other</i>	Respond to Petition	8/7/2017	8/7/2017	State Water Board Response to Seven Springs Limited Partnership Petition to R6-2017-0022.
[VIEW DOCS]	<i>Notices</i>	Notification - Public Participation Document Other Workplan -	7/28/2017	7/28/2017	Notice of Public Meeting for Stakeholders and Interested Parties - Meeting on August 23, 2017 9AM to 12PM
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Regulator Responded	7/26/2017	7/26/2017	Groundwater Investigation Work Plan
	<i>Other Regulatory Actions</i>	Meeting	7/19/2017	7/19/2017	Meeting with responsible parties to discuss draft work plan to comply with CAO
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	7/11/2017	7/11/2017	Off-site Sampling Lab report for June 27, 2017 water samples collected at five off-site monitoring well locations
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	7/10/2017	7/10/2017	Off-site Sampling Lab report for June 29, 2017 water samples collected at seven off-site monitoring well locations

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	Other Regulatory Actions	Site Visit / Inspection / Sampling	7/6/2017	7/6/2017	Off-site Sampling Lab report for June 22, 2017 water samples collected at two off-site monitoring well locations
[VIEW DOCS]	Other Regulatory Actions	Meeting	6/29/2017	6/29/2017	Meeting with water purveyors to answer questions about CAO R6T-2017-0022 and hear concerns
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	6/14/2017	6/14/2017	2Q 2017 Groundwater Monitoring Report and Current Site Remediation Status Report
	Other Regulatory Actions	Meeting	6/6/2017	6/6/2017	Meeting with Fox and Seven Springs representatives and consultants to discuss CAO R6T-2017-0022
[VIEW DOCS]	Enforcement/Orders	Clean-up and Abatement Order	5/12/2017	5/12/2017	CAO R6T-2017-0022
[VIEW DOCS]	Notices	Letter - Notice	3/8/2017	3/8/2017	Proposed CAO Electronic message from Executive Officer to interested PCE parties declining an offer from Alejandro Bras, counsel for Seven Springs, to meet to discussed alternate actions to issuing the proposed CAO. The Advisory Team has reviewed all the public comments on the matter and has all the information needed to issue a CAO. Will schedule a meeting of all interested parties with two weeks after CAO is issued. If the final order isn't accurate, the parties can petition it.
[VIEW DOCS]	Notices	Letter - Notice	3/6/2017	3/6/2017	Proposed CAO Electronic message from Executive Officer to interested PCE parties declining an offer from Nick Billings of Fox Capitol to meet to discussed alternate actions to issuing the proposed CAO. Nothing prevents the other parties from meeting and discussing other corrective actions, such as off-site investigations. It is inappropriate to address this matter at March 8-9 Board meeting and suggests he not attempt to. Will schedule a meeting of all interested parties after CAO is issued.
[VIEW DOCS]	Notices	Letter - Notice	3/3/2017	3/3/2017	Proposed Cleanup and Abatement Order Status Electronic message from Executive Officer to all interested PCE parties states CAO is being amended and should be out in three weeks. It is not appropriate for the public to provide comments on the proposed CAO at the upcoming Water Board's Mar. 8-9, 2017 meeting. The Advisory Team cannot meet to discuss the CAO until it has been issued, when a meeting can be scheduled. Can contact the Board's attorney to discuss procedural matters.
[VIEW DOCS]	Other Regulatory Actions	Staff Letter	2/28/2017	2/28/2017	REPLY TO RESPONSE TO COMMENTS ON AIR SPARGE PERFORMANCE TEST AND DISCUSSION OF OFF-SITE PCE EXTENT Letter replies to the consultant's July 27, 2016 letter responding to Board staff's comments on the results of air sparge testing in January 2016. The letter gives reasoning why information provided in the Response was not sufficient or adequate enough to change our opinion on the matter. Water Board staff waited to reply to the Response pending additional off-site PCE data collection, which is attached with this letter. Based on the additional data, this reply provides Water Board staff's conclusion concerning the off-site extent of the LTLW's PCE plume in groundwater, affecting an inactive municipal well and an active municipal well. Lastly, the letter states that quarterly monitoring at the site could be postponed to May 15, 2017 with the report due 45 days later.
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	2/25/2017	2/25/2017	4Q 2016 Groundwater Monitoring Report and Current Site Remediation Status Report - PCE increased in wells MW-1S to 56 ppb and in MW-5S to 51 ppb from 3rd quarter 2016. PCE also increased in off-site well OS-1 from 1 ppb to 9 ppb. Vapor probes had low VOC levels up to 556 ug/m3 at VP-2 near MW-1S, down from 42,000 ug/m3 in 3rd quarter. AS/SVE operated during the quarter. Due to excess snow, report recommends no sampling in first quarter 2017.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	Other Regulatory Actions	Staff Letter	1/4/2017	1/4/2017	Request for Supplemental Work Plan Letter accepts batch pumping technology but recommends collecting additional samples to define the lateral and vertical extent of remaining PCE by May 15, 2017
[VIEW DOCS]	Notices	Letter - Notice	12/21/2016	12/21/2016	PCE Results from Off-site Monitoring Wells, Fall 2016 Letter to local water purveyors contains PCE groundwater results from monitoring well sampling on the north side of the Tahoe South Y intersection, conducted by Water Board staff in fall 2016.
[VIEW DOCS]	Other Regulatory Actions	Site Visit / Inspection / Sampling	10/20/2016	10/20/2016	Off-site Sampling Lab results for bromide results for tracer added to monitoring well HMW-4.
[VIEW DOCS]	Other Regulatory Actions	Site Visit / Inspection / Sampling	10/12/2016	10/12/2016	Off-site sampling Conducted off-site monitoring well sampling on north side of South Y area. Up to 100 ppb PCE detected in groundwater.
[VIEW DOCS]	Other Regulatory Actions	Site Visit / Inspection / Sampling	9/28/2016	9/28/2016	Off-site Sampling Conducted off-site monitoring well sampling on north side of South Y area.
	Other Regulatory Actions	Site Visit / Inspection / Sampling	9/26/2016	9/26/2016	Off-site sampling Conducted off-site monitoring well sampling on north side of South Y area.
[VIEW DOCS]	Response Requested - Workplans	CAP/RAP - Final Remediation / Design Plan - Regulator Responded	9/9/2016	9/9/2016	Workplan to Perform Batch Pumping - Workplan evaluates three options to achieve final site cleanup and proposes high-vacuum batch extraction at 3 on-site locations.
[VIEW DOCS]	Response Requested - Other	Correspondence	9/8/2016	9/8/2016	Commerce Bank - Lake Tahoe Laundry Works' CAO Comments: Comments on Proposed Revisions to Lake Tahoe Laundry Works Cleanup and Abatement Order No. R6T-2016-PROP
[VIEW DOCS]	Response Requested - Other	Correspondence	9/8/2016	9/8/2016	TKPOA - Lake Tahoe Laundry Works' CAO Comments
[VIEW DOCS]	Response Requested - Other	Correspondence	9/8/2016	9/8/2016	Fox Capital Management Corporation - Response to Revised Cleanup and Abatement Order
[VIEW DOCS]	Response Requested - Reports	Monitoring Report - Quarterly	9/1/2016	9/15/2016	Second Quarter 2016 Groundwater and Remediation Status Report - Groundwater table rose from 0.9 to 1.5 feet from last quarter. PCE concentrations also rose to 110 ppb at MW-1 near source area but were stable or reduced in all other monitoring wells. Off-site well OS-1 was at 1.5 ppb PCE. AS/SVE system continues to operate but has reached asymptotic levels.
[VIEW DOCS]	Enforcement/Orders	Clean-up and Abatement Order	8/9/2016	8/9/2016	Request for Comments on Revised Proposed CAO
[VIEW DOCS]	Response Requested - Other	Email Correspondence	8/9/2016	8/9/2016	Email from Kevin Leid re: naming of Bobby Page Cleaners
[VIEW DOCS]	Enforcement/Orders	Clean-up and Abatement Order	7/18/2016	7/18/2016	Proposed Revisions to Lake Tahoe Laundry Works Cleanup and Abatement Order No. R6T-2016-PROP Also includes: Prosecution Team Response to Comments Proposed No Further Action Required letter and Response to Comments on 60-Day Notice for Lakeside NAPA Auto Store, 1935 Lake Tahoe Boulevard Proposed No Further Action Required letter and Response to Comments on 60-Day Notice for Big O Tires Store #147, 1961 Lake Tahoe Boulevard Public comments due by Sept. 8, 2016., This version of the proposed CAO extends the PCE investigation area out to Tahoe Keys Well #2 and removes the requirement to provide replacement water for an affected supply well.
	Other Regulatory Actions	Meeting	6/29/2016	6/29/2016	Meeting with RPs to discuss final site cleanup

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[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	5/30/2016	5/28/2016	First Quarter 2016 Groundwater and Remediation Status Report - Groundwater table rose from 0.5 to 4 feet from last quarter. PCE concentrations also rose by one to two orders of magnitude: 180 ppb at MW-5 and 66 ppb at MW-1. AS/SVE system continues to operate but has reached asymptotic levels.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	5/24/2016	5/24/2016	Comments on Air Sparge Performance Test Water Board staff letter disagrees with the Air Sparge Report conclusion that the AS/SVE system provides adequate coverage for remediating and containing the PCE plume to the site.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	2/28/2016	2/22/2016	Fourth Quarter 2015 Groundwater Monitoring Report - Water table dropped on average by 0.89 feet since third quarter; now ranges 14 to 18 ft bgs. PCE reduced since last quarter from 150 to 37 ppb in MW-1. But PCE increased to highest level in two years at MW-5 at 34 ppb. Off-site well OS-1 reduced to 5 ppb from 9.6 ppb in prior quarter. Remediation system operated during fourth quarter per orders by the Water Board after concentrations spiked during third quarter, reducing soil vapor from 460 ppbV in third quarter to 160 ppbV in fourth quarter.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	2/17/2016	2/17/2016	Completion of Tasks in Stipulated Agreement Letter acknowledges completion of tasks in the June 15, 2015 Stipulated Agreement.
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	2/11/2016	2/11/2016	TKPOA - Lake Tahoe Laundry Works' CAO Comments
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	2/11/2016	2/11/2016	Kopania - Comments on Draft CAO for Lake Tahoe Laundry Works
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	2/11/2016	2/11/2016	Commerce Bank Comments on Proposed Cleanup and Abatement Order No. R6T-2015-PROP
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	2/11/2016	2/11/2016	Hogan Lovells - Response to Proposed Cleanup and Abatement Order for Former Lake Tahoe Laundry Works
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	2/10/2016	2/10/2016	STPUD - Comments in Response to the Revised Request for Comments-Proposed Cleanup and Abatement Order
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	2/9/2016	2/9/2016	Lukins - Comments in Response to Proposed Cleanup and Abatement Order
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	1/14/2016	1/14/2016	Extension of Comment Period for Proposed Cleanup and Abatement Order Letter grants an extension to the CAO comment period to Feb. 11, 2016.
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan - Regulator Responded	12/18/2015	12/18/2015	Submittal of Workplan for Indoor Air Sampling at the LTLW building - Workplan proposes to collect two samples inside each of the four tenant spaces in the building and also ambient samples from the roof.
[VIEW DOCS]	<i>Enforcement/Orders</i>	Deadline Extension	12/8/2015	12/8/2015	Extension granted for CAO comment period to Jan. 15, 2016 Letter grants an extension to the CAO comment period to Jan. 15, 2016.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/7/2015	12/7/2015	Request to extend public comment period for draft CAO The Water Board Prosecution Team relays the RPs request to the Advisory Team to extend the public comment period for the draft CAO to Jan. 15, 2016.
	<i>Other Regulatory Actions</i>	Meeting	12/2/2015	12/2/2015	Technical Conference Call Call between Water Board staff and attorneys and responsible parties to discuss proposed CAO, PCE investigation, and upcoming letter requiring indoor air sampling.
	<i>Other Regulatory Actions</i>	Meeting	11/18/2015	11/18/2015	Meeting with Responsible Parties to discuss site

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[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	11/15/2015	11/11/2015	Third Quarter 2015 Groundwater Monitoring Report - Water results show an order of magnitude increase in PCE concentration at site. MW-1S had 150 ppb, up from 16 ppb in the prior quarter. Soil gas sampling showed a significant increase throughout the entire site. Highest vapor reading was 13,560 ug/m3 at VP-2--4 orders of magnitude increase. Report states that remediation system went down in July due to a power surge. Since sampling occurred in September, high detections reflect two months with remediation system being off.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	11/9/2015	11/9/2015	Lab results of off-site monitoring well samples Water samples collected on 10/30/15 from off-site monitoring wells show up to 150 ppb PCE, 5.4 ppb TCE, and 2.1 DCE. Also detected were low levels of MEK, TPH-gasoline, and high levels of TPH-oil. The lab incorrectly lists the first sample being from the "Hanzel-N" well but it's supposed to be "Hurzel-N" well, with N for north.
	<i>Response Requested - Other</i>	Verbal Communication	10/13/2015		Remedial system turned on - The DPE system was turned back on upon receiving lab results showing PCE concentrations increasing in MW-1S to 150 ppb in 3rd Q 2015 sampling. The DPE system went down on July 21, 2015 due to a power surge.
[VIEW DOCS]	<i>Enforcement/Orders</i>	Clean-up and Abatement Order	9/30/2015	9/30/2015	Revised Request for Comments on Proposed CAO Comment period extended to Dec. 14, 2015
[VIEW DOCS]	<i>Enforcement/Orders</i>	Clean-up and Abatement Order - #0ron	9/15/2015	9/15/2015	Request for Comments on Proposed Cleanup and Abatement Order The comment period ends at 5:00 PM on Oct. 30, 2015
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	9/15/2015	9/21/2015	2nd Quarter 2015 Groundwater Monitoring Report an Remediation Status Report - Monitoring well results show a high of 16 ppb PCE in MW-1S and 10 ppb in OS-1. Vapor samples showed high vapor concentrations at VP-5, VP-6, and VP-9, which are mostly adjacent to building foundation. Remediation system was found off on July 21, 2015 from a power surge. Some equipment will need to be replaced and take awhile before the system is up again. Report recommends keping the system off and doing more frequent but limited well sampling.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	8/21/2015	8/21/2015	Lab results for Hurzel well-south (upgradient) Lab reported 85 ppb PCE, 1.7 ppb TCE, and 0.4 ppb DCE in water sample from upgradient Hurzel Well, located 949 Emerald Bay Road.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	7/29/2015	7/29/2015	Site Visit
	<i>Other Regulatory Actions</i>	Meeting	7/21/2015	7/21/2015	Notice of remediation system being offline Consultant's email states that power surge knocked the remediation system offline on July 21. Working with power company to resume power and repair equipment. Re-start date is unknown.
	<i>Response Requested - Other</i>	Other Report / Document	*10/27/2015	11/17/2015	Responsible Parties are to reimburse affected domestic well owner for costs to connect to municiple supply water. - Domestic well owner sent information to Water Board that he received last of reimbursement checks on 10/27/15.
[VIEW DOCS]	<i>Agreements</i>	Settlement Agreement	6/15/2015	6/15/2015	Lake Tahoe Laundry Works Settlement Agreement for Alternate Water Supply Seven Springs Limited and Fox Capitol agree to provide bottle water, or reimburse payment for such, to the owner of affected domestic wells at 883 and 903 Eloise Ave in South Lake Tahoe, within 7 days of this agreement dated June 5, 2015. The Dischargers also agree within 21 days to arrange for or reimburse property owner for permanent replacement water supply.

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[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	6/15/2015	6/23/2015	First Quarter 2015 Groundwater Monitoring Report - Report shows a decrease in PCE levels in all on-site wells to below MCL. Highest PCE was 2.7 ppb at MW-13S. However, off-site PCE increased to 64 ppb from 9 ppb in the prior quarter. Remediation system operated throughout quarter.
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	3/1/2015	3/27/2015	Fourth Quarter 2014 Groundwater Monitoring Report - Report shows decreasing PCE levels in groundwater. Highest detection in MW-2 at 22 ppb. Remediation system operated during quarter; highest detection was at VP-2 at 520 ppbv. Vapor sample points VP-5 & 6 not sampled due to damaged wellhead.
	<i>Other Regulatory Actions</i>	Meeting	2/13/2015	2/13/2015	Meeting to discuss proposed cleanup and abatement order. Meeting between Water Board staff and Seven Springs to discuss draft CAO for PCE detection in two domestic wells on Eloise Ave.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	2/12/2015	2/12/2015	Schneeweis PCE well results Letter states that 8 ppb PCE was detected in a water sample collected from the domestic well on Jan. 27, 2015. Sample may actually be from pressure tank and if so, then PCE in well may be higher in concentration.
	<i>Other Regulatory Actions</i>	Verbal Communication	2/3/2015	2/3/2015	Call with consultant re PCE detections in two private wells
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	1/30/2015	1/30/2015	Water Analysis for Stanford Sierra Camp Domestic Well Letter informs property owner that PCE up to 50 ppb was detected in a water sample from the domestic well.
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	12/15/2014	12/12/2014	Third Quarter 2014 Groundwater Monitoring and Remediation Status Report - Report shows PCE levels have reduced in on-site monitoring wells. Highest PCE detected in MW-5S at 8.2 ppb. Off-site well OS-1 at 10 ppb. Remediation system was down most of the quarter due to maintenance/equipment problems. Resumed operating Aug. 14, 2015.
	<i>Response Requested - Reports</i>	Monitoring Report - Other	10/15/2014	10/20/2014	Second Quarter 2014 Groundwater Monitoring Report - Highest PCE in groundwater at MW-1S at 130 ppb. This is an increase from 1st Quarter 2014 when PCE was detected at high of 7.2 ppb. Depth to groundwater in June 2014 is 11 ft bgs.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	9/18/2014	9/18/2014	Water Analysis for Stanford Sierra Camps Domestic Well Letter informs property owner that PCE up to 52 ppb was detected in a water sample from the domestic well.
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	9/17/2014	9/17/2014	Lab results for 883 Eloise and 787 Lake Tahoe Boulevard. Sampling conducted on September 11, 2014.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/16/2014	9/16/2014	Hand written note to Don and Anna Lance
[VIEW DOCS]	<i>Agreements</i>	Cost Recovery Agreement / N. of Reimbursement	7/25/2014	7/25/2014	Oversight Cost reimbursement for Site Cleanup Program Oversight Cost Reimbursement Notice Return agreement for oversight cost reimbursement form within 30 days.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	7/15/2014	7/15/2014	Email from Kyle Flory of PES Environmental transmitting contact information for Fox Capital Management Corporation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/9/2014	4/9/2014	Acceptance of Proposal for Remediation Operation Change Water Board acceptance of consultant's proposal to change operation of the AS/SVE to 2 weeks on & 2 weeks off.

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	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/7/2014	4/7/2014	Change in Operation of Remediation System Water Board staff accepted E2C's proposal to operate the remediation system at the site cycling it 2 weeks on and 2 weeks off, which may begin immediately. We will issue a letter shortly documenting our acceptance. It was pointed out that the fourth quarter 2013 monitoring report was submitted one month late and reminded the parties that monitoring reports are due to the Water Board 45 days following the end of each quarter (see Board Order R6T-2013-0069, dated Aug. 2013). The first quarter 2014 monitoring report is due by May 15, 2014. Also, as an FYI, we understand that Wells Fargo is scheduled to move into the vacant commercial site (formerly Sports LTD store) on the northwest corner of the South Y shopping center. If PCE concentrations in vapors should continue to exceed 1,000 ppbV in vapor point VP-9 at the same location, we will require indoor air monitoring be conducted in that building space to verify there are no risks to human health from potential vapor intrusion.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Other	2/15/2014	3/19/2013	Fourth Quarter 2013 Groundwater Monitoring Report - PCE in groundwater increased in MW-5s to 150 ppb and decreased in all other wells. Vapor monitoring detected 1,300 ppbV in VP-9, a decrease from before but still two orders of magnitude above other vapor wells.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Other	1/13/2014	1/15/2014	Third Quarter 2013 Groundwater Monitoring Program - PCE concentrations increased in groundwater compared to prior quarter: MW-1 at 770 ppb, MW-2 at 86, MW-12 at 34, MW-5 at 81. Off-site well OS-1 decreased to 8 ppb. Ozone sprage in operation at time of Sept. 2013 sampling. In November, replaced with AS/SVE.
	<i>Response Requested - Reports</i>	Remedy in Place	11/22/2013	11/12/2013	Submit notice that air sparge/ soil vapor extraction system is re-started at site. - Nov. 12, 2013 notice states that remediation system turned back on on Nov. 5, 2013.
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement - #R6V-2013-0090	11/1/2013	11/1/2013	ORDER REQUIRING REPORTS ON REMEDIATION SYSTEM OPERATIONS
	<i>Response Requested - Other</i>	Correspondence	9/2/2013	8/26/2013	RP returned completed form agreeing to oversight cost reimbursement for the site.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	8/15/2013	9/25/2013	Second Quarter 2013 Groundwater Monitoring and Remediation Status Report
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Monitoring Program - #R6T-2013-0064	8/2/2013	8/2/2013	Acceptance of Remediation Workplan and Investigative Order to Submit Technical Reports Accepts proposed cleanup plan for the site and requires quarterly monitoring reports, beginning Aug. 15, 2013.
	<i>Agreements</i>	Cost Recovery Agreement / N. of Reimbursement	8/2/2013	8/2/2013	Oversight Cost Reimbursement Notice Return agreement for oversight cost reimbursement form within 30 days.
	<i>Notices</i>	Letter - Notice	6/13/2013	6/13/2013	Request for Public Comments for Cleanup at the Former Lake Tahoe Laundry Works
[VIEW DOCS]	<i>Notices</i>	Notification - Public Notice of ROD/RAP/CAP	6/13/2013	6/13/2013	Request for Public Comments for Cleanup
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	5/1/2013	5/6/2013	First Quarter 2013 Groundwater Monitoring Report - Highest PCE detected in well MW-1 at 5.94 ppb. Concentrations continue to decrease across site.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	4/29/2013	4/29/2013	Site visit to review well locations
	<i>Other Regulatory Actions</i>	Meeting	4/16/2013	4/16/2013	Conference call with consultants re progress towards closure
	<i>Other Regulatory Actions</i>	Meeting	3/4/2013	3/4/2013	Conference call with consultant re site progress

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	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/3/2012	12/3/2012	Proposal to Add ozone spargin to site Sent email to consultant accepting proposal to add ozone sparging to site to enhance remediation.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly - Regulator Responded	10/31/2012	11/5/2012	Third Quarter 2012 Groundwater Monitoring Report and Interim Remediation Status Report - Report states that both groundwater levels and PCE levels in groundwater have decreased at site. Well MW-2 had highest PCE at 48 ppb while Water Board split sample had 20 ppb. Meanwhile, PCE vapors keep increasing im well VP-2 to 7,150 ppbV. Report recommends adding ozone sparging to site in fourth quarter 2012 to enhance remediation.
	<i>Agreements</i>	Cost Recovery Agreement / N. of Reimbursement	8/1/2012	8/1/2012	Oversight Cost Reimbursement for Site Cleanup Program
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	10/31/2011	11/4/2011	Third Quarter 2011 Groundwater Monitoring Report and Interim Remediation Status Report - PCE levels are decreasing at almost all well locations, except for MW-5S. Remedial actions look good.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	9/22/2011	9/22/2011	Verified remedial system operation
[VIEW DOCS]	<i>Agreements</i>	Cost Recovery Agreement / N. of Reimbursement	9/13/2011	9/13/2011	Oversight Cost Reimbursement Program Letter notifies RPs that the state is entering the site into the cost reimbursement program for regulatory oversight of cleanup actions.
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	*7/31/2011	8/1/2011	Second Quarter 2011 Site Status and Groundwater Monitoring Report
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	1/31/2011	2/7/2011	Fourth Quarter 2010 Groundwater Monitoring Report - PCE levels have dropped. MW-1S is now 109 ppb, down from 547 ppb in third quarter 2010.
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	*8/15/2010	8/13/2010	- With higher water table levels, PCE conc also rose. MW-1 had highest PCE at 4,920 ppb, 8 ppb TCE, and 6 ppp DCE. Pilot test for SVE/AS went from Apr. 6 to June 6--results report pending. Remediation system still operating
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	5/15/2010	6/3/2010	First Quarter 2010 Monitoring and Remediation Report - Highest PCE detected in groundwater is 2,000 ppb in well MW-1S. Water table is up a foot over last quarter. New off-site well OS-1 has PCE at 92 ppb. 60-day pilot test started on Apr. 6, 2010--technical report to follow with second quarter data.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	3/2/2010	3/2/2010	Inspected site for Remediation Status Spoke with sub-contractor working on remediation shed. Waiting for electric company to drop a new power line to them. System should be running week of Mar. 8, 2010.
	<i>Response Requested - Reports</i>	Remedial Progress Report	3/1/2010	2/9/2010	Project Status and Extention Request - Letter describes remediation construction to date. States that delays from weather, etc require late start-up of AS/SVE system. Request extension of report submittal date from March 1 to May 31, 2010. Also states that off-site monitoring well to be placed along Emerald Bay Road.
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	2/28/2010	3/1/2010	Fourth Quarter 2009 Groundwater Monitoring - MW-1S contain >5,000 ppb PCE and some TCE--which is higher than found in past site investigations. Concentrations indicate DNAPL at site.

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	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	2/11/2010	2/11/2010	Status of Remediation Shed and Proposed well location Visited site to see status of remediation shed being built. Talked to sub-contractor. Also visited proposed location for off-site monitoring well.
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/9/2010	2/9/2010	Reply to Report Extension Request Email from Board staff accepts request to extend remediation report submittal date from March 1 to May 31. However, groundwater monitoring report due by Feb. 28. Need map showing new proposed location for off-site monitoring well.
	<i>Other Regulatory Actions</i>	Staff Letter	12/3/2009	12/3/2009	Staff email accepting Dec. 1 Erosion and Sediment Control Workplan
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	11/23/2009	11/23/2009	Visited site to view progress of interim remediation installation. Expected completion of soil disturbance is Nov. 24, 2009.
	<i>Other Regulatory Actions</i>	Staff Letter	11/23/2009	11/23/2009	Requirement to submit erosion and sediment control plan By Dec. 1, submit the requested plan for controlling erosion in landscaped areas where vegetation and soil have been removed or disturbed.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	11/19/2009	11/19/2009	Visited site to view project progress and to remind consultant to winterize site for tomorrow's forecasted storm.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	11/12/2009	11/12/2009	Site Visit to Review Interim Remedial System Installation
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/10/2009	11/10/2009	Grading Variance Letter October 15 Grading Variance allows soil disturbance activities from Nov. 14 to Dec. 4 for installing interim remediation system.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	11/10/2009	11/10/2009	Site visit to review installation of interim remediation system. Warned that BMPs must be installed since inclement weather predicted for tomorrow.
	<i>Other Regulatory Actions</i>	Meeting	10/20/2009	10/20/2009	Conference call with consultant re status of site activities and off-site access agreements
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/15/2009	10/15/2009	October 15 Grading Variance Allows soil disturbance activities from Oct. 15 to Nov. 13 for installing interim remediation system.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	10/15/2009	10/15/2009	Authorization to Conduct Soil Disturbance Activities after October 15
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/3/2009	9/3/2009	Responded to Consultant's Questions Provided consultant with copy of workplan acceptance letter, adjacent property owner information, excavator information, and Oct. 15 grading variance information.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	9/1/2009	9/1/2009	Acceptance of Interim Remedial Action Workplan and Addendum Letter accepts workplan for installing a soil vapor extraction/ air sparge system and conducting pilot testing. Report is due approximately six months following workplan acceptance.
	<i>Response Requested - Workplans</i>	Corrective Action Plan / Remedial Action Plan - Addendum	8/30/2009	8/26/2006	Addendum for Interim Redial Action - Addendum proposing shorter monitoring well screens and additional monitoring well across the Y intersection.
	<i>Other Regulatory Actions</i>	File review	8/18/2009	8/18/2009	Email to consultant stating that a conditional workplan acceptance letter to be issuance by end of this month unless addendum received of additional proposed monitoring well.

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	<i>Other Regulatory Actions</i>	Meeting	6/22/2009	6/22/2009	Phone call with consultant to discuss Interim Remediation Workplan and need to add a monitoring well across the Y.
	<i>Response Requested - Workplans</i>	Corrective Action Plan / Remedial Action Plan	*6/4/2009	6/4/2009	Interim Remediation Workplan - Workplan proposes to install and pilot test an air sparge/soil vapor extracion system to remediation on-site PCE in soil and groundwater.
	<i>Other Regulatory Actions</i>	Meeting	5/12/2009	5/12/2009	Call from consultant about status of the RAP. Agreed to give a two-week extension to the May 21, 2009 RAP deadline.
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement - #R6T-2009-0013	4/8/2009	4/8/2009	Investigative Order to submit workplan for PCE remediation and monitoring
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	4/8/2009	4/8/2009	Investigative Order No. R6T-2009-0013 to Submit Workplan for Remediation
	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	9/25/2008	9/22/2008	Report provides the results of additional investigation to define PCE in soil and groundwater.
	<i>Other Regulatory Actions</i>	Meeting	9/24/2008	9/24/2008	Meeting to discuss results of further site investigation for PCE
	<i>Other Regulatory Actions</i>	Verbal Communication	6/24/2008	6/24/2008	Spoke with consultant re submitted workplan for site investigation.
	<i>Other Regulatory Actions</i>	Meeting	5/9/2008	5/9/2008	Meeting between RPs and Board staff to discuss future corrective actions at the site.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Petition Dismissed by Executive Director	6/6/2007	6/6/2007	Petition of Blackrock Realty Advisors, Inc., Lahontan Water Board: Dismissal of Petition Held in Abeyance
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	6/5/2007	6/5/2007	Petition for Review of Site Investigation at the Lake Tahoe Laundry Works. Letter responded to petition for review of RP status. Letter agrees with petitioner that Black Rock Realty Advisors not considered an RP for cleanup at site.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/12/2007	4/12/2007	Petition of Blackrock Realty Advisors, Inc., Lahontan Water Board: Approval of Request to Continue to be Held in Abeyance
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/15/2007	2/15/2007	Public records request
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	7/14/2006	7/14/2006	Postponement of Corrective Action Workplan
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	6/9/2006	6/9/2006	Letter from Morrison Foerster re: Lake Tahoe Laundry Works
	<i>Other Regulatory Actions</i>	Meeting	6/2/2006	6/2/2006	RP requested meting to discuss why it is technically and economically inaproopriate for them to submit a corrective action workplan at this time. Will follow up with a letter.
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	4/18/2006	4/18/2006	Board staff letter requires submittal of a corrective action plan by June 30, 2006.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Investigation	1/31/2006	1/31/2006	Additional Soil Investigation Results
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	11/4/2005	11/4/2005	Approval of Workplan for Additional Soil Investigation
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workolan - Regulator	10/14/2005	10/19/2005	Workplan for Additional Soil Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	10/5/2005	10/5/2005	Letter from Morrison Foerster re ownership history

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	9/2/2005	9/2/2005	Comments on Workplan for Additional Site Investigation Results
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/22/2005	8/22/2005	Staff Report Solvent Contamination at the Big O Tires Store
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	7/20/2005	7/20/2005	Petition for Review - letter to Orrick, Herrington and Sutcliff LLP acknowledging receipt of information
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	6/6/2005	6/6/2005	June 2, 2005 letter from Orrick, Herrington & Sutcliff LLP transmitting Petition for Reconsideration re:Lake Tahoe Laundry Works, Comments on Workplan for Supplemental Site Investigation dated March 7, 2005 Petition for Reconsideration
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	6/2/2005	6/2/2005	Letter from Orrick, Herrington & Sutcliffe LLP re Comments on Workplan for Supplemental Site Investigation Dated March 7, 2005 Petition for Reconsideration
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	5/27/2005	5/27/2005	Additional Site Investigation Results
	<i>Response Requested - Other</i>	Correspondence	5/2/2005	5/2/2005	April 28, 2005 Letter from Orrick, Herrington, & Sutcliff LLP requesting information related to Blackrock's petition
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	4/28/2005	4/28/2005	Request for copies relating to Blackrock petition
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Petition of Agency Action or Inaction	4/13/2005	4/13/2005	Petition of Blackrock Realty Advisors Inc., Lahontan Water Board:Acknowledgement of Petition Received and Approval of Request to Be Held In Abeyance (SWRCB/OCC File A-1694)
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	3/7/2005	3/7/2005	Comments on Workplan for Supplemental Site Investigation
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	11/22/2004	11/22/2004	Comments on Supplemental Site Investigation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/16/2004	11/16/2004	Internal email string re GW-6
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	10/13/2004	10/13/2004	Supplemental Site Investigation Results
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/6/2004	8/6/2004	Public record request
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	7/26/2004	7/26/2004	Comments on Workplan for Supplemental Site Investigation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/1/2004	7/1/2004	Petition for Review for Site Investigation - Removal of AIMCO as a potential RP (SWRCB/OCC File A-1644)
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Site Investigation Workplan	7/1/2004	7/1/2004	Workplan for Soil Supplemental Site Investigation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/22/2004	6/22/2004	Petition of AIMCO (Technical Report Order for the Lake Tahoe Laundry Works), Lahontan Region: Acknowledgement of Petition Received
	<i>Other Regulatory Actions</i>	Staff Letter	6/17/2004	6/17/2004	
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	6/16/2004	6/16/2004	Facsimile from Scott Reisch to Harold Singer (Lahontan Water Board EO) and Betsy Jennings (SWRCB) with copy of June 16, 2004 Petition for Review and Request for Stay

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	5/17/2004	5/17/2004	Revised Request for Workplan for Supplemental Site Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	5/12/2004	5/12/2004	Letter from Steefel, Levitt, & Weiss re: South Y Center Leasing History Update
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	4/26/2004	4/26/2004	Response to Request for Workplan for Supplemental Site Investigation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	4/12/2004	4/12/2004	Request for Workplan for Supplemental Site Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	3/11/2004	3/11/2004	Memorandum South Y Center Ownership History
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	11/20/2003	11/20/2003	Groundwater Investigation Results
	<i>Cleanup Action</i>		11/20/2003		
	<i>Leak Action</i>	Leak Reported	11/7/2003		
	<i>Leak Action</i>	Leak Discovery	10/10/2003		
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	9/2/2003	9/2/2003	Review of Workplan by PES Environmental, Inc. for Lake Tahoe Laundry Works
	<i>Enforcement - Other</i>	* No Action	8/21/2003	8/21/2003	
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	8/21/2003	8/21/2003	Approval of Workplan for Groundwater Investigation
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	8/13/2003	8/13/2003	Workplan for Groundwater Investigation
	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	*8/17/2003	8/13/2003	Work Plan for Groundwater Investigation, Lake Tahoe Laundry Works, 1024 Lake Tahoe BLVD, South Lake Tahoe, California by PES Environmental, Inc.
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	6/5/2003	6/5/2003	Notice to Submit Workplan for Investigation
	<i>Leak Action</i>	Leak Stopped	12/1/1979		
	<i>Leak Action</i>	Leak Began	1/1/1976		
	<i>Enforcement - Other</i>	UNK			
	<i>Enforcement - Other</i>	UNK			
	<i>Enforcement - Other</i>	UNK			
	<i>Enforcement - Other</i>	UNK			
	<i>Enforcement - Other</i>	UNK			
	<i>Enforcement - Other</i>	UNK			

B. Environmental Data (ESI)

1. Individual Well Analytical Data

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
GW-10-P-1	Borehole					
GW-10-P-2	Borehole					
GW-10-P-3	Borehole					
GW-10-P-4	Borehole					
GW-10-P-5	Borehole					
GW-11	Borehole					
GW-11-P-1	Borehole					
GW-11-P-2	Borehole					
GW-11-P-3	Borehole					
GW-11-P-4	Borehole					
GW-11-P-5	Borehole					
<u>GW-12</u>	Borehole					
GW-12-P-1	Borehole					
GW-12-P-2	Borehole					
GW-12-P-3	Borehole					
GW-12-P-4	Borehole					
GW-12-P-5	Borehole					
GW-12-P-6	Borehole					
GW-12-P-7	Borehole					
GW-8-P-1	Borehole					
GW-8-P-2	Borehole					
GW-8-P-3	Borehole					
GW-8-P-4	Borehole					
GW-8-P-5	Borehole					
GW-8-P-6	Borehole					
GW-9-P-1	Borehole					
GW-9-P-2	Borehole					
GW-9-P-3	Borehole					
GW-9-P-4	Borehole					
GW-9-P-5	Borehole					
GW-9-P-6	Borehole					
LTLW-SB-1	Borehole					Phase I
LTLWGW1-14	Borehole					
LTLWGW1-26	Borehole					
LTLWGW1-45	Borehole					
LTLWGW1-63	Borehole					
LTLWGW1-75	Borehole					
LTLWGW2-11	Borehole					
LTLWGW2-18	Borehole					
LTLWGW2-33	Borehole					
LTLWGW2-50	Borehole					
LTLWGW2-76	Borehole					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
LTLWGW3-14	Borehole					
LTLWGW3-26	Borehole					
LTLWGW3-45	Borehole					
LTLWGW3-63	Borehole					
LTLWGW3-75	Borehole					
LTLWGW4-14	Borehole					
LTLWGW4-26	Borehole					
LTLWGW4-45	Borehole					
LTLWGW4-63	Borehole					
LTLWGW4-75	Borehole					
LTLWGW5-14	Borehole					
LTLWGW5-26	Borehole					
LTLWGW5-42	Borehole					
LTLWGW5-60	Borehole					
LTLWGW5-73	Borehole					
LTLWGW6-14	Borehole					
LTLWGW6-26	Borehole					
LTLWGW6-42	Borehole					
LTLWGW6-60	Borehole					
LTLWGW6-73	Borehole					
LTLWGW7-14	Borehole					
LTLWGW7-26	Borehole					
LTLWGW7-42	Borehole					
LTLWGW7-60	Borehole					
LTLWGW7-73	Borehole					
SB-1	Borehole					Boring Lake Tahoe Laundry Works
SB-19	Borehole					Boring Lake Tahoe Laundry Works
SB-2	Borehole					Boring Lake Tahoe Laundry Works
SB-20	Borehole					Boring Lake Tahoe Laundry Works
SB-21	Borehole					Boring Lake Tahoe Laundry Works
SB-22	Borehole					Boring Lake Tahoe Laundry Works
SB-23	Borehole					Boring Lake Tahoe Laundry Works
SB-3	Borehole					Boring Lake Tahoe Laundry Works
SB-4	Borehole					Boring Lake Tahoe Laundry Works
SB-5	Borehole					Boring Lake Tahoe Laundry Works
SB-6	Borehole					Boring Lake Tahoe Laundry Works
SB10	Borehole					Boring Lake Tahoe Laundry Works
SB11	Borehole					Boring Lake Tahoe Laundry Works

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
SB12	Borehole					Boring Lake Tahoe Laundry Works
SB13	Borehole					Boring Lake Tahoe Laundry Works
SB14	Borehole					Boring Lake Tahoe Laundry Works
SB15	Borehole					Boring Lake Tahoe Laundry Works
SB16	Borehole					Boring Lake Tahoe Laundry Works
SB17	Borehole					Boring Lake Tahoe Laundry Works
SB18	Borehole					Boring Lake Tahoe Laundry Works
SB5B	Borehole					Boring Lake Tahoe Laundry Works
SB7	Borehole					Boring Lake Tahoe Laundry Works
SB8	Borehole					Boring Lake Tahoe Laundry Works
SB9	Borehole					Boring Lake Tahoe Laundry Works
SD1-2.75	Borehole					
SD2-4.25	Borehole					
SD3-3.0	Borehole					
SD4-4.0	Borehole					
SD5-3.0	Borehole					
SD6-3.0	Borehole					
SS1-5.75	Borehole					
SS2-6.0	Borehole					
WL1-3.75	Borehole					
WL2-3.75	Borehole					
EB	QC					
GW-16-DUP	QC					
GW-21-DUP	QC					
J6DUP	QC					
LTB2DUP	QC					
LTB4DUP	QC					
LTLW-GW-11-46EB	QC					
LTLWGW4-26-DUP	QC					
LTLWGW5-14-DUP	QC					
LTLWGW7-26-DUP	QC					
LW-MW-19	QC					
LW-MW-19S	QC					QC - Field Duplicate Sample
ROGDUP	QC					
TABSG-01 DUP	QC					
TABSG-07 DUP	QC					
TATADUP	QC					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
EB-010518	QCEB					
EB_011018	QCEB					
EQUIP. BLANK	QCEB					
J6GW01	QCEB					
LTB101	QCEB					
LTB301	QCEB					
LTLW-GW-9-EQUIP	QCEB					
ROGGW01	QCEB					
ROGGW02	QCEB					
TATA01	QCEB					
FIELD BLAN	QCFB					Field blank
QCTB	QCTB					
TB-010518	QCTB					
TB_010818	QCTB					
TB_011018	QCTB					
OS-1	Remediation/Groundwater Monitoring Well	9.25	12.13			
AS-1	Remediation/Groundwater Monitoring Well					
AS-10	Remediation/Groundwater Monitoring Well					
AS-11	Remediation/Groundwater Monitoring Well					
AS-12	Remediation/Groundwater Monitoring Well					
AS-13	Remediation/Groundwater Monitoring Well	16.60	16.60			
AS-14	Remediation/Groundwater Monitoring Well	1.08	1.08			
AS-15	Remediation/Groundwater Monitoring Well					
AS-16	Remediation/Groundwater Monitoring Well					
AS-17	Remediation/Groundwater Monitoring Well					
AS-18	Remediation/Groundwater Monitoring Well					
AS-19	Remediation/Groundwater Monitoring Well	0.78	0.78			
AS-2	Remediation/Groundwater Monitoring Well					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
AS-20	Remediation/Groundwater Monitoring Well	1.48	1.48			
AS-21	Remediation/Groundwater Monitoring Well	2.18	2.18			
AS-22	Remediation/Groundwater Monitoring Well					
AS-23	Remediation/Groundwater Monitoring Well					
AS-24	Remediation/Groundwater Monitoring Well					
AS-25	Remediation/Groundwater Monitoring Well	0.89	0.89			
AS-26	Remediation/Groundwater Monitoring Well					
AS-27	Remediation/Groundwater Monitoring Well					
AS-3	Remediation/Groundwater Monitoring Well					
AS-4	Remediation/Groundwater Monitoring Well					
AS-5	Remediation/Groundwater Monitoring Well					
AS-6	Remediation/Groundwater Monitoring Well	1.12	1.12			
AS-7	Remediation/Groundwater Monitoring Well	0.31	0.31			
AS-8	Remediation/Groundwater Monitoring Well	1.23	1.23			
AS-9	Remediation/Groundwater Monitoring Well					
DS-1	Remediation/Groundwater Monitoring Well	13.25	13.25			
LW-MW-10S	Remediation/Groundwater Monitoring Well	4.41	14.30			
LW-MW-10SR	Remediation/Groundwater Monitoring Well	2.60	16.58			
LW-MW-11S	Remediation/Groundwater Monitoring Well	3.51	16.59			

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
LW-MW-12S	Remediation/Groundwater Monitoring Well	2.20	15.00			
LW-MW-13S	Remediation/Groundwater Monitoring Well	4.89	30.70			
LW-MW-14	Remediation/Groundwater Monitoring Well					
LW-MW-14S	Remediation/Groundwater Monitoring Well					
LW-MW-1D	Remediation/Groundwater Monitoring Well	10.31	22.05			
LW-MW-1S	Remediation/Groundwater Monitoring Well	3.08	15.77			
LW-MW-1S/1D	Remediation/Groundwater Monitoring Well					
LW-MW-1S_1D	Remediation/Groundwater Monitoring Well					
LW-MW-2D	Remediation/Groundwater Monitoring Well	12.53	22.30			
LW-MW-2S	Remediation/Groundwater Monitoring Well	6.32	26.88			
LW-MW-2S_2D	Remediation/Groundwater Monitoring Well					
LW-MW-3D	Remediation/Groundwater Monitoring Well					
LW-MW-3S	Remediation/Groundwater Monitoring Well					
LW-MW-3S_3D	Remediation/Groundwater Monitoring Well					
LW-MW-4D	Remediation/Groundwater Monitoring Well					
LW-MW-4S	Remediation/Groundwater Monitoring Well					
LW-MW-4S_4D	Remediation/Groundwater Monitoring Well					
LW-MW-5D	Remediation/Groundwater Monitoring Well	12.58	21.65			
LW-MW-5S	Remediation/Groundwater Monitoring Well	2.12	15.25			

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
LW-MW-5S_5D	Remediation/Groundwater Monitoring Well					
LW-MW-6D	Remediation/Groundwater Monitoring Well					
LW-MW-6S	Remediation/Groundwater Monitoring Well					
LW-MW-6S_6D	Remediation/Groundwater Monitoring Well					
LW-MW-7D	Remediation/Groundwater Monitoring Well					
LW-MW-7S	Remediation/Groundwater Monitoring Well					
LW-MW-7S_7D	Remediation/Groundwater Monitoring Well					
LW-MW-8D	Remediation/Groundwater Monitoring Well					
LW-MW-8S	Remediation/Groundwater Monitoring Well					
LW-MW-8S_8D	Remediation/Groundwater Monitoring Well					
LW-MW-9S	Remediation/Groundwater Monitoring Well	4.55	17.23			
LW-MW-9S_9D	Remediation/Groundwater Monitoring Well					
MW-10S	Remediation/Groundwater Monitoring Well					
MW-10SR	Remediation/Groundwater Monitoring Well					
MW-11S	Remediation/Groundwater Monitoring Well					
MW-12S	Remediation/Groundwater Monitoring Well					
MW-13S	Remediation/Groundwater Monitoring Well					
MW-14	Remediation/Groundwater Monitoring Well					
MW-15	Remediation/Groundwater Monitoring Well					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
MW-15S	Remediation/Groundwater Monitoring Well					
MW-1S	Remediation/Groundwater Monitoring Well					
MW-2S	Remediation/Groundwater Monitoring Well					
MW-38M	Remediation/Groundwater Monitoring Well					
MW-5S	Remediation/Groundwater Monitoring Well					
MW-9S	Remediation/Groundwater Monitoring Well					
OS-1	Remediation/Groundwater Monitoring Well	4.09	16.10			
OS-2M	Remediation/Groundwater Monitoring Well	8.18	15.51			
OS-2S	Remediation/Groundwater Monitoring Well	3.77	11.23			
OS-3M	Remediation/Groundwater Monitoring Well	13.61	25.53			
OS-3S	Remediation/Groundwater Monitoring Well	5.53	12.54			
OS-4M	Remediation/Groundwater Monitoring Well	10.75	17.61			
OS-4M-DUP	Remediation/Groundwater Monitoring Well					
OS-4S	Remediation/Groundwater Monitoring Well	2.23	9.65			
S-1	Remediation/Groundwater Monitoring Well	10.69	10.69			
S-2	Remediation/Groundwater Monitoring Well					
S-5	Remediation/Groundwater Monitoring Well					
VES-10D	Remediation/Groundwater Monitoring Well					
VES-10D_10S	Remediation/Groundwater Monitoring Well					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
VES-10S	Remediation/Groundwater Monitoring Well					
VES-11D	Remediation/Groundwater Monitoring Well					
VES-11D_11S	Remediation/Groundwater Monitoring Well					
VES-11S	Remediation/Groundwater Monitoring Well					
VES-12D	Remediation/Groundwater Monitoring Well					
VES-12D_12S	Remediation/Groundwater Monitoring Well					
VES-12S	Remediation/Groundwater Monitoring Well					
VES-13D	Remediation/Groundwater Monitoring Well					
VES-13D_13S	Remediation/Groundwater Monitoring Well					
VES-13S	Remediation/Groundwater Monitoring Well					
VES-14D	Remediation/Groundwater Monitoring Well					
VES-14D_14S	Remediation/Groundwater Monitoring Well					
VES-14S	Remediation/Groundwater Monitoring Well					
VES-15D	Remediation/Groundwater Monitoring Well					
VES-15D_15S	Remediation/Groundwater Monitoring Well					
VES-15S	Remediation/Groundwater Monitoring Well					
VES-16D	Remediation/Groundwater Monitoring Well					
VES-16D_16S	Remediation/Groundwater Monitoring Well					
VES-16S	Remediation/Groundwater Monitoring Well					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
VES-17D	Remediation/Groundwater Monitoring Well					
VES-17D_17S	Remediation/Groundwater Monitoring Well					
VES-17S	Remediation/Groundwater Monitoring Well					
VES-18D	Remediation/Groundwater Monitoring Well					
VES-18D_18S	Remediation/Groundwater Monitoring Well					
VES-18S	Remediation/Groundwater Monitoring Well					
VES-19D	Remediation/Groundwater Monitoring Well					
VES-19D_19S	Remediation/Groundwater Monitoring Well					
VES-19S	Remediation/Groundwater Monitoring Well					
VES-1D	Remediation/Groundwater Monitoring Well					
VES-1D_1S	Remediation/Groundwater Monitoring Well					
VES-1D_2S	Remediation/Groundwater Monitoring Well					
VES-1S	Remediation/Groundwater Monitoring Well					
VES-20D	Remediation/Groundwater Monitoring Well					
VES-20D_20S	Remediation/Groundwater Monitoring Well					
VES-20S	Remediation/Groundwater Monitoring Well					
VES-2D	Remediation/Groundwater Monitoring Well					
VES-2D_2S	Remediation/Groundwater Monitoring Well					
VES-2S	Remediation/Groundwater Monitoring Well					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
VES-3D	Remediation/Groundwater Monitoring Well					
VES-3D_3S	Remediation/Groundwater Monitoring Well					
VES-3S	Remediation/Groundwater Monitoring Well					
VES-4D	Remediation/Groundwater Monitoring Well					
VES-4D_4S	Remediation/Groundwater Monitoring Well					
VES-4S	Remediation/Groundwater Monitoring Well					
VES-5D	Remediation/Groundwater Monitoring Well					
VES-5D_5S	Remediation/Groundwater Monitoring Well					
VES-5S	Remediation/Groundwater Monitoring Well					
VES-6D	Remediation/Groundwater Monitoring Well					
VES-6D_6S	Remediation/Groundwater Monitoring Well					
VES-6S	Remediation/Groundwater Monitoring Well					
VES-7D	Remediation/Groundwater Monitoring Well					
VES-7D_7S	Remediation/Groundwater Monitoring Well					
VES-7S	Remediation/Groundwater Monitoring Well					
VES-8D	Remediation/Groundwater Monitoring Well					
VES-8D_8S	Remediation/Groundwater Monitoring Well					
VES-8S	Remediation/Groundwater Monitoring Well					
VES-9D	Remediation/Groundwater Monitoring Well					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
VES-9D_9S	Remediation/Groundwater Monitoring Well					
VES-9S	Remediation/Groundwater Monitoring Well					
TBSG-01	Soil Gas					
TBSG-02	Soil Gas					
TBSG-03	Soil Gas					
TBSG-04	Soil Gas					
TBSG-05	Soil Gas					
TBSG-06	Soil Gas					
TBSG-07	Soil Gas					
TBSG-08	Soil Gas					
TBSG-09	Soil Gas					
TBSG-10	Soil Gas					
42605-SCOM	Transient Subsurface					
42605-WCOM	Transient Subsurface					
5E	Transient Subsurface					
5EGW23	Transient Subsurface					
5EGW40	Transient Subsurface					
5EGW49	Transient Subsurface					
5EGW80	Transient Subsurface					
DUN2GW24	Transient Subsurface					
DUN2GW32	Transient Subsurface					
DUN2GW56	Transient Subsurface					
DUN2GW70	Transient Subsurface					
EQUIPMENT BLANK	Transient Subsurface					
FIFGW23	Transient Subsurface					
FIFGW40	Transient Subsurface					
FIFGW49	Transient Subsurface					
FIFGW80	Transient Subsurface					
GW-1	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-16-10	Transient Subsurface					
GW-16-28	Transient Subsurface					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
GW-16-40	Transient Subsurface					
GW-16-44	Transient Subsurface					
GW-16-54	Transient Subsurface					
GW-16-69	Transient Subsurface					
GW-17-10	Transient Subsurface					
GW-17-28	Transient Subsurface					
GW-17-40	Transient Subsurface					
GW-17-44	Transient Subsurface					
GW-17-54	Transient Subsurface					
GW-17-69	Transient Subsurface					
GW-18-10	Transient Subsurface					
GW-18-28	Transient Subsurface					
GW-18-40	Transient Subsurface					
GW-18-44	Transient Subsurface					
GW-18-54	Transient Subsurface					
GW-18-69	Transient Subsurface					
GW-19-10	Transient Subsurface					
GW-19-20	Transient Subsurface					
GW-19-28	Transient Subsurface					
GW-19-45	Transient Subsurface					
GW-19-63	Transient Subsurface					
GW-19-73	Transient Subsurface					
GW-2	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-20-10	Transient Subsurface					
GW-20-32	Transient Subsurface					
GW-20-45	Transient Subsurface					
GW-20-52	Transient Subsurface					
GW-20-74	Transient Subsurface					
GW-21-11	Transient Subsurface					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
GW-21-25	Transient Subsurface					
GW-21-36	Transient Subsurface					
GW-21-46	Transient Subsurface					
GW-21-58	Transient Subsurface					
GW-21-72	Transient Subsurface					
GW-3	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-4	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-5	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-6	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-7	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-8	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-SB-4	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-SB-5	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-SB1	Transient Subsurface					GW sample Lake Tahoe Laundry
GW-SB3	Transient Subsurface					GW sample Lake Tahoe Laundry
GW10	Transient Subsurface					GW sample Lake Tahoe Laundry
GW9	Transient Subsurface					GW sample Lake Tahoe Laundry
J1	Transient Subsurface					
J1GW24	Transient Subsurface					
J1GW32	Transient Subsurface					
J1GW56	Transient Subsurface					
J1GW70	Transient Subsurface					
J2GW22	Transient Subsurface					
J2GW39	Transient Subsurface					
J2GW65	Transient Subsurface					
J2GW70	Transient Subsurface					
J3	Transient Subsurface					
J3GW22	Transient Subsurface					
J3GW39	Transient Subsurface					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
J3GW65	Transient Subsurface					
J3GW70	Transient Subsurface					
J4GW22	Transient Subsurface					
J4GW39	Transient Subsurface					
J4GW65	Transient Subsurface					
J4GW70	Transient Subsurface					
J5GW22	Transient Subsurface					
J5GW39	Transient Subsurface					
J5GW65	Transient Subsurface					
J5GW70	Transient Subsurface					
J6GW29	Transient Subsurface					
J6GW45	Transient Subsurface					
J6GW53	Transient Subsurface					
J6GW73	Transient Subsurface					
KM2GW21	Transient Subsurface					
KM2GW32	Transient Subsurface					
KM2GW44	Transient Subsurface					
KM2GW70	Transient Subsurface					
KMCPT1	Transient Subsurface					
LTB1GW22	Transient Subsurface					
LTB1GW32	Transient Subsurface					
LTB1GW45	Transient Subsurface					
LTB1GW52	Transient Subsurface					
LTB1GW74	Transient Subsurface					
LTB2GW22	Transient Subsurface					
LTB2GW28	Transient Subsurface					
LTB2GW39	Transient Subsurface					
LTB2GW49	Transient Subsurface					
LTB2GW58	Transient Subsurface					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
LTB3GW22	Transient Subsurface					
LTB3GW32	Transient Subsurface					
LTB3GW45	Transient Subsurface					
LTB3GW52	Transient Subsurface					
LTB3GW74	Transient Subsurface					
LTB4	Transient Subsurface					
LTB4GW22	Transient Subsurface					
LTB4GW28	Transient Subsurface					
LTB4GW39	Transient Subsurface					
LTB4GW49	Transient Subsurface					
LTB4GW58	Transient Subsurface					
LTLW-GW-1	Transient Subsurface					
LTLW-GW-10-26	Transient Subsurface					
LTLW-GW-10-26-D	Transient Subsurface					
LTLW-GW-10-34	Transient Subsurface					
LTLW-GW-10-46	Transient Subsurface					
LTLW-GW-10-61	Transient Subsurface					
LTLW-GW-10-74	Transient Subsurface					
LTLW-GW-11	Transient Subsurface					
LTLW-GW-11-26	Transient Subsurface					
LTLW-GW-11-34	Transient Subsurface					
LTLW-GW-11-46	Transient Subsurface					
LTLW-GW-11-60	Transient Subsurface					
LTLW-GW-11-71	Transient Subsurface					
LTLW-GW-11-71-D	Transient Subsurface					
LTLW-GW-12-26	Transient Subsurface					
LTLW-GW-12-34	Transient Subsurface					
LTLW-GW-12-46	Transient Subsurface					
LTLW-GW-12-60	Transient Subsurface					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
LTLW-GW-12-71	Transient Subsurface					
LTLW-GW-13-18	Transient Subsurface					
LTLW-GW-13-29	Transient Subsurface					
LTLW-GW-13-46	Transient Subsurface					
LTLW-GW-13-62	Transient Subsurface					
LTLW-GW-13-76	Transient Subsurface					
LTLW-GW-14-18	Transient Subsurface					
LTLW-GW-14-29	Transient Subsurface					
LTLW-GW-14-46	Transient Subsurface					
LTLW-GW-14-62	Transient Subsurface					
LTLW-GW-14-76	Transient Subsurface					
LTLW-GW-15-18	Transient Subsurface					
LTLW-GW-15-29	Transient Subsurface					
LTLW-GW-15-46	Transient Subsurface					
LTLW-GW-15-62	Transient Subsurface					
LTLW-GW-15-76	Transient Subsurface					
LTLW-GW-2	Transient Subsurface					
LTLW-GW-6	Transient Subsurface					
LTLW-GW-8-26	Transient Subsurface					
LTLW-GW-8-34	Transient Subsurface					
LTLW-GW-8-46	Transient Subsurface					
LTLW-GW-8-62	Transient Subsurface					
LTLW-GW-8-76	Transient Subsurface					
LTLW-GW-9	Transient Subsurface					
LTLW-GW-9-26	Transient Subsurface					
LTLW-GW-9-34	Transient Subsurface					
LTLW-GW-9-34-D	Transient Subsurface					
LTLW-GW-9-46	Transient Subsurface					
LTLW-GW-9-62	Transient Subsurface					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
LTLW-GW-9-76	Transient Subsurface					
OS-3	Transient Subsurface					
ROGGW29	Transient Subsurface					
ROGGW45	Transient Subsurface					
ROGGW53	Transient Subsurface					
ROGGW73	Transient Subsurface					
TATA	Transient Subsurface					
TATAGW28	Transient Subsurface					
TATAGW48	Transient Subsurface					
TATAGW64	Transient Subsurface					
TATAGW74	Transient Subsurface					
TEN	Transient Subsurface					
AS-12/VE-4	Vapor Extraction Well					
AS-15/VE-5	Vapor Extraction Well					
AS-3/VE-2S	Vapor Extraction Well					
VE-10	Vapor Extraction Well	2.31	2.31			
VE-11	Vapor Extraction Well	2.39	2.39			
VE-12	Vapor Extraction Well	2.26	2.26			
VE-13	Vapor Extraction Well	2.06	2.06			
VE-2	Vapor Extraction Well					
VE-2S	Vapor Extraction Well	1.46	1.46			
VE-3	Vapor Extraction Well	2.69	2.69			
VE-4	Vapor Extraction Well	2.13	2.13			
VE-5	Vapor Extraction Well	2.15	2.15			
VP-1	Vapor Extraction Well					
VP-10	Vapor Extraction Well					
VP-2	Vapor Extraction Well					
VP-3	Vapor Extraction Well					
VP-5	Vapor Extraction Well					

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
VP-6	Vapor Extraction Well					
VP-7	Vapor Extraction Well					
VP-8	Vapor Extraction Well					
VP-9	Vapor Extraction Well					
EQUIP. BLA						
SB6B						
TRIP BLANK						

2. Laboratory Analytical Reports (EDF)

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
GROUND WATER INVESTIGATION RESULTS 10/09/2003...	Q4 2003	MAURA DOUGHERTY	6/7/2007
SUPPLEMENTAL INVESTIGATION RESULTS 09/23/2004...	Q3 2004	MAURA DOUGHERTY	6/7/2007
ANALYTICAL REPORT (WATER) 05/04/20005	Q2 2005	MAURA DOUGHERTY	5/31/2007
ADDITIONAL SITE INVESTIGATION RESULTS ANALYTICAL REPORT MAY ...	Q2 2005	MAURA DOUGHERTY	6/7/2007
ANALYTICAL REPORT (SOIL) 11/26/2005	Q4 2005	MAURA DOUGHERTY	5/31/2007
LAKE TAHOE LAUNDRY WORKS 1Q 2010 GWM (3-23-10)...	Q1 2010	PHIL GOALWIN	10/25/2010*
LAKE TAHOE LAUNDRY WORKS 3Q 2010 GWM (9-10-10)...	Q3 2010	PHIL GOALWIN	11/2/2010*
LAKE TAHOE LAUNDRY WORKS 2Q11 GWM (5-11-11)...	Q2 2011	PHIL GOALWIN	8/1/2011
LAKE TAHOE LAUNDRY WORKS 4Q11 GWM (12-9-11)...	Q4 2011	PHIL GOALWIN	2/16/2012*
LAKE TAHOE LAUNDRY WORKS 1Q12 GWM (3-29-12)...	Q1 2012	PHIL GOALWIN	5/9/2012*
LAKE TAHOE LAUNDRY WORKS 2Q12 GWM (6-8-12)...	Q2 2012	PHIL GOALWIN	8/17/2012*
3Q 2012 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATIO...	Q3 2012	PHIL GOALWIN	11/6/2012
4Q 2012 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATIO...	Q4 2012	PHIL GOALWIN	4/3/2013
1Q 2013 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATIO...	Q1 2013	PHIL GOALWIN	5/2/2013
2Q 2013 GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS...	Q3 2013	PHIL GOALWIN	9/30/2013

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
<u>3Q 2013 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q3 2013	PHIL GOALWIN	1/10/2014
<u>4Q 2013 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q4 2013	PHIL GOALWIN	4/21/2014
<u>1Q 2014 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q1 2014	PHIL GOALWIN	8/4/2014
<u>2Q 2014 GROUNDWATER MONITORING AND CURRENT SITE REMEDIATION ...</u>	Q2 2014	PHIL GOALWIN	10/27/2014
<u>3Q 2013 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q3 2014	PHIL GOALWIN	1/5/2015
<u>4Q 2014 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q4 2014	PHIL GOALWIN	4/10/2015
<u>1Q 2015 GROUNDWATER MONITORING AND CURRENT SITE REMEDIATION ...</u>	Q1 2015	PHIL GOALWIN	7/2/2015
<u>2Q 2015 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q2 2015	PHIL GOALWIN	9/22/2015
<u>3Q 2015 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q3 2015	PHIL GOALWIN	11/17/2015
<u>4Q 2015 GROUNDWATER MONITORING AND CURRENT SITE REMEDIATION ...</u>	Q4 2015	PHIL GOALWIN	2/23/2016
<u>1Q 2016 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q1 2016	PHIL GOALWIN	6/8/2016
<u>3Q 2016 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q3 2016	PHIL GOALWIN	12/8/2016*
<u>4Q 2016 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q4 2016	PHIL GOALWIN	3/13/2017*
<u>2Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q2 2017	PHIL GOALWIN	6/14/2017*
<u>2Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q2 2017	PHIL GOALWIN	6/14/2017*
<u>2Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q2 2017	PHIL GOALWIN	6/14/2017*

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
<u>2Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q2 2017	PHIL GOALWIN	6/14/2017*
<u>INVESTIGATION SUMMARY REPORT</u>	Q2 2017	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q2 2017	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q2 2017	EKI STAFF	9/23/2019*
<u>3Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q3 2017	PHIL GOALWIN	3/9/2018*
<u>INVESTIGATION SUMMARY REPORT</u>	Q3 2017	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q3 2017	EKI STAFF	10/2/2019*
<u>4Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q4 2017	PHIL GOALWIN	3/16/2018*
<u>PHASE I GROUNDWATER INVESTIGATION</u>	Q1 2018	KYLE FLORY	9/10/2019*
<u>PHASE I GROUNDWATER INVESTIGATION</u>	Q1 2018	KYLE FLORY	9/10/2019*
<u>PHASE I GROUNDWATER INVESTIGATION</u>	Q1 2018	KYLE FLORY	9/10/2019*
<u>1Q 2018 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q2 2018	PHIL GOALWIN	6/20/2018*
<u>2Q 2018 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q2 2018	PHIL GOALWIN	9/26/2018*
<u>3Q 2018 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMED...</u>	Q3 2018	PHIL GOALWIN	12/18/2018*
<u>GROUNDWATER ANALYTICAL DATA</u>	Q4 2018	EKI STAFF	2/7/2019*
<u>GROUNDWATER ANALYTICAL DATA</u>	Q4 2018	EKI STAFF	2/7/2019*

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
<u>GROUNDWATER ANALYTICAL DATA</u>	Q4 2018	EKI STAFF	2/7/2019*
<u>GROUNDWATER ANALYTICAL DATA</u>	Q4 2018	EKI STAFF	2/7/2019*
<u>PREFERENTIAL PATHWAY EVAL</u>	Q4 2018	KYLE FLORY	9/10/2019*
<u>PREFERENTIAL PATHWAY EVAL</u>	Q4 2018	KYLE FLORY	9/10/2019*
<u>INVESTIGATION SUMAMRY REPORT</u>	Q4 2018	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q4 2018	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q4 2018	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q4 2018	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q4 2018	EKI STAFF	9/27/2019*
<u>FOURTH QUARTER 2018</u>	Q4 2018	KYLE FLORY	4/30/2021*
<u>INVESTIGATION SUMMARY REPORT</u>	Q1 2019	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q1 2019	EKI STAFF	9/23/2019*
<u>1Q 2019 GROUNDWATER MONITORING REPORT</u>	Q1 2019	KYLE FLORY	12/16/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q2 2019	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q2 2019	EKI STAFF	9/23/2019*
<u>INVESTIGATION SUMMARY REPORT</u>	Q2 2019	EKI STAFF	9/23/2019*

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>	
<u>INVESTIGATION SUMMARY REPORT</u>	Q2 2019	EKI STAFF	9/23/2019*	
<u>INVESTIGATION SUMAMRY REPORT</u>	Q2 2019	EKI STAFF	9/23/2019*	
<u>2Q 2019 GROUNDWATER MONITORING REPORT</u>	Q2 2019	KYLE FLORY	12/16/2019*	
<u>THIRD QUARTER 2019 REPORT</u>	Q3 2019	KYLE FLORY	12/19/2019*	
<u>PPR NO. 27 - DATA GAP INVESTIGATION - TUCKER AVE. BASIN PSG...</u>	Q3 2019	KYLE FLORY	6/8/2021*	<u>VIEW NARRATIVE DATA</u>
<u>FOURTH QUARTER 2019</u>	Q4 2019	KYLE FLORY	4/12/2020*	
<u>FOURTH QUARTER 2019 REPORT</u>	Q4 2019	KYLE FLORY	4/13/2020*	
<u>FIRST QUARTER 2020 MONITORING REPORT</u>	Q1 2020	KYLE FLORY	11/10/2020*	
<u>FIRST QUARTER 2020 REPORT</u>	Q1 2020	KYLE FLORY	4/30/2021*	
<u>SECOND QUARTER 2020 MONITORING REPORT</u>	Q2 2020	KYLE FLORY	11/10/2020*	<u>VIEW NARRATIVE DATA</u>
<u>LTW SVS 3Q20 (9-24-20)</u>	Q3 2020	PHIL GOALWIN	2/10/2021	
<u>SECOND QUARTER 2020 MONITORING REPORT_RESAMPLE...</u>	Q3 2020	KYLE FLORY	3/22/2021*	<u>VIEW NARRATIVE DATA</u>
<u>THIRD QUARTER 2020 REPORT</u>	Q3 2020	KYLE FLORY	3/22/2021*	
<u>THIRD QUARTER 2020 REPORT SV</u>	Q3 2020	KYLE FLORY	4/30/2021*	
<u>SECOND QUARTER 2020 SV</u>	Q3 2020	KYLE FLORY	4/30/2021*	
<u>FOURTH QUARTER 2020 REPORT</u>	Q4 2020	KYLE FLORY	3/22/2021*	

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
<u>FOURTH QUARTER 2020 REPORT</u>	Q4 2020	KYLE FLORY	3/22/2021*
<u>FIRST QUARTER 2021 MONITORING REPORT</u>	Q1 2021	KYLE FLORY	1/12/2022*
<u>FIRST QUARTER 2021 REPORT</u>	Q1 2021	KYLE FLORY	1/12/2022*
<u>SECOND QUARTER 2021 REPORT</u>	Q2 2021	KYLE FLORY	1/12/2022*
<u>SECOND QUARTER 2021 REPORT</u>	Q2 2021	KYLE FLORY	1/18/2022*
<u>THIRD QUARTER 2021 REPORT</u>	Q3 2021	KYLE FLORY	1/18/2022*
<u>THIRD QUARTER 2021 REPORT</u>	Q3 2021	KYLE FLORY	1/18/2022*
<u>INVESTIGATION SUMMARY REPORT</u>		EKI STAFF	9/23/2019*

2. Well Latitude / Longitude Data (GEO_XY)

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
MONITORING WELL LOCATION AND ELEVATION REPORT...	EKI STAFF	2/15/2019

3. Well Survey Data (GEO_Z)

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
MONITORING WELL LOCATION AND ELEVATION REPORT...	EKI STAFF	2/15/2019

4. Well Depth to Water Data (GEO_WELL)

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
GEO WELL (12-4-09)	PHIL GOALWIN	10/22/2010*
GEO WELL (3-23-10)	PHIL GOALWIN	10/22/2010*
GEO WELL (9-8-10)	PHIL GOALWIN	11/2/2010*
GEO WELL (12-16-10)	PHIL GOALWIN	2/3/2011*
GEO WELL (5-11-11)	PHIL GOALWIN	8/1/2011
GEO WELL (9-29-11)	PHIL GOALWIN	11/1/2011
GEO WELL (12-9-11)	PHIL GOALWIN	2/15/2012*
GEO WELL (3-29-12)	PHIL GOALWIN	5/9/2012*
GEO WELL (6-8-12)	PHIL GOALWIN	8/17/2012*
GEO WELL (8-21-12)	PHIL GOALWIN	11/7/2012
GEO WELL (11-19-12)	PHIL GOALWIN	3/14/2013
GEO WELL (3-11-13)	PHIL GOALWIN	5/2/2013
GEO WELL (7-30-13)	PHIL GOALWIN	9/30/2013
GEO WELL 9-30-13	PHIL GOALWIN	1/9/2014
GEO WELL 12-10-13	PHIL GOALWIN	4/10/2014
GEO WELL 3-6-14	PHIL GOALWIN	8/4/2014
GEO WELL 6-16-14	PHIL GOALWIN	10/22/2014
GEO WELL 9-17-14	PHIL GOALWIN	12/15/2014*
GEO WELL 12-16-14	PHIL GOALWIN	3/31/2015
GEO WELL 3-26-15	PHIL GOALWIN	6/24/2015
GEO WELL (6-12-15)	PHIL GOALWIN	9/22/2015
GEO WELL (9-11-15)	PHIL GOALWIN	11/17/2015
GEO WELL (12-18-15)	PHIL GOALWIN	2/19/2016
GEO WELL (3-25-16)	PHIL GOALWIN	6/8/2016

<u>GEO WELL (6-21-16)</u>	PHIL GOALWIN	9/23/2016
<u>GEO WELL (9-28-16)</u>	PHIL GOALWIN	11/20/2016
<u>GEO WELL (12-20-16)</u>	PHIL GOALWIN	2/26/2017
<u>GEO WELL (5-2-17)</u>	PHIL GOALWIN	6/14/2017*
<u>GEO WELL (9-27-17)</u>	PHIL GOALWIN	1/10/2018
<u>GEO WELL (12-21-17)</u>	PHIL GOALWIN	3/16/2018*
<u>GEO WELL (4-4-18)</u>	PHIL GOALWIN	6/20/2018*
<u>GEO WELL (6-25-18)</u>	PHIL GOALWIN	9/24/2018*
<u>GEO WELL (9-26-18)</u>	PHIL GOALWIN	12/18/2018*
<u>GEO WELL (NOV2018-SEP2019)</u>	KYLE FLORY	12/16/2019*
<u>FOURTH QUARTER 2019 REPORT</u>	KYLE FLORY	3/30/2020
<u>GEO WELL (JAN2020-DEC2020)</u>	KYLE FLORY	3/22/2021*
<u>GEO WELL (JAN2021-SEP2021)</u>	KYLE FLORY	1/12/2022*

C. Site Maps / Documents

1. Site Maps (GEO_MAP), Boring Logs (GEO_BORE) and KML / KMZ Files

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMITTED</u>	<u>SIZE</u>
GEO_MAP	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	589 KB
GEO_BORE (SB-1)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	24 KB
GEO_BORE (SB-2)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	23 KB
GEO_BORE (SB-3)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	22 KB
GEO_BORE (SB-4)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	29 KB
GEO_BORE (SB-6)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	21 KB
GEO_BORE (SB-8B)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	21 KB
GEO_BORE (SB-13)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	25 KB
GEO_BORE (SB-19)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	20 KB
GEO_BORE (SB-20)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	20 KB
GEO_BORE (SB-21)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	21 KB
GEO_BORE (SB-22)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	20 KB
GEO_BORE (SB-23)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	22 KB
GEO_BORE (SB-5)	MAURA DOUGHERTY (AUTH_RP)	5/31/2007*	24 KB
GEO_MAP	MAURA DOUGHERTY (AUTH_RP)	6/1/2007*	31 KB
GEO_BORE (SB10)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	21 KB
GEO_BORE (SB11)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	25 KB
GEO_BORE (SB12)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	24 KB
GEO_BORE (SB13)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	25 KB
GEO_BORE (SB14)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	25 KB
GEO_BORE (SB15)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	24 KB
GEO_BORE (SB16)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	24 KB
GEO_BORE (SB17)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	26 KB
GEO_BORE (SB18)	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	25 KB

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMITTED</u>	<u>SIZE</u>
<u>GEO_BORE (SB5B)</u>	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	21 KB
<u>GEO_BORE (SB6B)</u>	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	25 KB
<u>GEO_BORE (SB7)</u>	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	26 KB
<u>GEO_BORE (SB8)</u>	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	24 KB
<u>GEO_BORE (SB9)</u>	MAURA DOUGHERTY (AUTH_RP)	6/7/2007*	24 KB
<u>GEO_MAP</u>	PHIL GOALWIN (AUTH_RP)	10/22/2010*	170 KB
<u>GEO_MAP</u>	PHIL GOALWIN (AUTH_RP)	10/22/2010*	32 KB
<u>GEO_MAP</u>	PHIL GOALWIN (AUTH_RP)	10/22/2010*	122 KB
<u>B-LOG AS-1 (AS-1)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
<u>B-LOG AS-2 (AS-2)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
<u>B-LOG AS-3 (AS-3)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	73 KB
<u>B-LOG AS-4 (AS-4)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	73 KB
<u>B-LOG AS-5 (AS-5)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
<u>B-LOG AS-6 (AS-6)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	73 KB
<u>B-LOG AS-7 (AS-7)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	74 KB
<u>B-LOG AS-8 (AS-8)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	69 KB
<u>B-LOG AS-9 (AS-9)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	67 KB
<u>B-LOG AS-10 (AS-10)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	77 KB
<u>B-LOG AS-11 (AS-11)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	74 KB
<u>B-LOG AS-12 (AS-12)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
<u>B-LOG AS-13 (AS-13)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	64 KB
<u>B-LOG AS-14 (AS-14)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	69 KB
<u>B-LOG AS-15 (AS-15)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	72 KB
<u>B-LOG AS-16 (AS-16)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	67 KB
<u>B-LOG AS-17 (AS-17)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
<u>B-LOG AS-18 (AS-18)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	64 KB
<u>B-LOG AS-19 (AS-19)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	66 KB
<u>B-LOG AS-20 (AS-20)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	70 KB
<u>B-LOG AS-21 (AS-21)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
<u>B-LOG AS-22 (AS-22)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	67 KB
<u>B-LOG AS-23 (AS-23)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	74 KB
<u>B-LOG AS-24 (AS-24)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
<u>B-LOG AS-25 (AS-25)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	70 KB
<u>B-LOG AS-26 (AS-26)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	64 KB
<u>B-LOG AS-27 (AS-27)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	69 KB
<u>B-LOG LW-MW-1S 1D (LW-MW-1S 1D)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,473 KB
<u>B-LOG LW-MW-2S 2D (LW-MW-2S 2D)</u>	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,388 KB

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMITTED</u>	<u>SIZE</u>
B-LOG LW-MW-3S 3D (LW-MW-3S 3D)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,431 KB
B-LOG LW-MW-4S 4D (LW-MW-4S 4D)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,335 KB
B-LOG LW-MW-5S 5D (LW-MW-5S 5D)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,325 KB
B-LOG LW-MW-6S 6D (LW-MW-6S 6D)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,326 KB
B-LOG LW-MW-7S 7D (LW-MW-7S 7D)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,346 KB
B-LOG LW-MW-8S 8D (LW-MW-8S 8D)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	1,296 KB
B-LOG LW-MW-9S (LW-MW-9S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	71 KB
B-LOG LW-MW-10S (LW-MW-10S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	70 KB
B-LOG LW-MW-11S (LW-MW-11S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
B-LOG LW-MW-12S (LW-MW-12S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	72 KB
B-LOG LW-MW-13S (LW-MW-13S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	63 KB
B-LOG VES-1D 1S (VES-1D 1S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	66 KB
B-LOG VES-2D 2S (VES-2D 2S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	76 KB
B-LOG VES-3D 3S (VES-3D 3S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	70 KB
B-LOG VES-4D 4S (VES-4D 4S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	70 KB
B-LOG VES-5D 5S (VES-5D 5S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	66 KB
B-LOG VES-6D 6S (VES-6D 6S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	70 KB
B-LOG VES-7D 7S (VES-7D 7S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	65 KB
B-LOG VES-8D 8S (VES-8D 8S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	66 KB
B-LOG VES-9D 9S (VES-9D 9S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	64 KB
B-LOG VES-10D 10S (VES-10D 10S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	64 KB
B-LOG VES-11D 11S (VES-11D 11S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	68 KB
B-LOG VES-12D 12S (VES-12D 12S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	72 KB
B-LOG VES-13D 13S (VES-13D 13S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	69 KB
B-LOG VES-14D 14S (VES-14D 14S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	70 KB
B-LOG VES-15D 15S (VES-15D 15S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	78 KB
B-LOG VES-16D 16S (VES-16D 16S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	66 KB
B-LOG VES-17D 17S (VES-17D 17S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	72 KB
B-LOG VES-18D 18S (VES-18D 18S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	72 KB
B-LOG VES-19D 19S (VES-19D 19S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	74 KB
B-LOG VES-20D 20S (VES-20D 20S)	PHIL GOALWIN (AUTH_RP)	11/2/2010*	72 KB
GEO MAP	PHIL GOALWIN (AUTH_RP)	9/27/2013	446 KB
B-LOG (LW-MW-10SR)	PHIL GOALWIN (AUTH_RP)	9/27/2013	59 KB
INVESTIGATION SUMMARY REPORT (KMCPT1)	EKI STAFF (AUTH_RP)	9/19/2019*	111 KB
INVESTIGATION SUMMARY REPORT (LW-MW-1S 1D)	EKI STAFF (AUTH_RP)	9/19/2019*	1,473 KB
INVESTIGATION SUMMARY REPORT (LW-MW-7S 7D)	EKI STAFF (AUTH_RP)	9/23/2019*	1,346 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	116 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	115 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	117 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	117 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	117 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	117 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	114 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	116 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/23/2019*	114 KB
INVESTIGATION SUMMARY REPORT (OS-3S)	EKI STAFF (AUTH_RP)	9/24/2019*	106 KB
INVESTIGATION SUMMARY REPORT (KMCPT1)	EKI STAFF (AUTH_RP)	9/24/2019*	111 KB
INVESTIGATION SUMMARY REPORT (KMCPT1)	EKI STAFF (AUTH_RP)	9/25/2019*	111 KB
INVESTIGATION SUMMARY REPORT (5E)	EKI STAFF (AUTH_RP)	9/25/2019*	116 KB
INVESTIGATION SUMMARY REPORT (J1)	EKI STAFF (AUTH_RP)	9/25/2019*	115 KB

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMITTED</u>	<u>SIZE</u>
INVESTIGATION SUMMARY REPORT (J3)	EKI STAFF (AUTH_RP)	9/25/2019*	117 KB
INVESTIGATION SUMMARY REPORT (LTB4)	EKI STAFF (AUTH_RP)	9/25/2019*	114 KB
INVESTIGATION SUMMARY REPORT (TATA)	EKI STAFF (AUTH_RP)	9/25/2019*	116 KB
INVESTIGATION SUMMARY REPORT (TEN)	EKI STAFF (AUTH_RP)	9/25/2019*	114 KB
INVESTIGATION SUMMARY REPORT (LTLW-GW-9)	EKI STAFF (AUTH_RP)	9/25/2019*	122 KB
INVESTIGATION SUMMARY REPORT (LTLW-GW-11)	EKI STAFF (AUTH_RP)	9/25/2019*	122 KB
INVESTIGATION SUMMARY REPORT (LTLW-GW-1)	EKI STAFF (AUTH_RP)	9/25/2019*	122 KB
INVESTIGATION SUMMARY REPORT (LTLW-GW-2)	EKI STAFF (AUTH_RP)	9/25/2019*	128 KB
INVESTIGATION SUMMARY REPORT (LTLW-GW-6)	EKI STAFF (AUTH_RP)	9/25/2019*	117 KB
INVESTIGATION SUMMARY REPORT (LTLW-GW-6)	EKI STAFF (AUTH_RP)	9/25/2019*	117 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/25/2019*	535 KB
INVESTIGATION SUMMARY REPORT (OS-2M)	EKI STAFF (AUTH_RP)	9/25/2019*	535 KB
INVESTIGATION SUMMARY REPORT (OS-2S)	EKI STAFF (AUTH_RP)	9/25/2019*	421 KB
INVESTIGATION SUMMARY REPORT (OS-3M)	EKI STAFF (AUTH_RP)	9/25/2019*	544 KB
INVESTIGATION SUMMARY REPORT (OS-3S)	EKI STAFF (AUTH_RP)	9/25/2019*	410 KB
INVESTIGATION SUMMARY REPORT (OS-4M)	EKI STAFF (AUTH_RP)	9/25/2019*	503 KB
INVESTIGATION SUMMARY REPORT (OS-4S)	EKI STAFF (AUTH_RP)	9/25/2019*	409 KB
INVESTIGATION SUMMARY REPORT (OS-3)	EKI STAFF (AUTH_RP)	9/25/2019*	106 KB
GEO MAP	KYLE FLORY (AUTH_RP)	12/18/2019*	1,276 KB
LTLW-SB-1 (LTLW-SB-1)	KYLE FLORY (AUTH_RP)	12/19/2019*	282 KB

2. Site Documents

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>MEETING BETWEEN WATER BOARD AND SEVEN SPRINGS LEGAL COUNSEL RE STIPULATION RE ADMINISTRATIVE RECORD EMAIL.</u>	MEETING	BRIAN GREY (REGULATOR)	8/22/2022	
<u>EMAIL RE STIPULATION RE ADMINISTRATIVE RECORD</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/19/2022	
<u>COMMENT PERIOD EXTENDED</u>	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	8/19/2022	
<u>STIPULATION RE ADMINISTRATIVE RECORD</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/17/2022	
<u>REQUEST FOR TECHNICAL REPORTS, LABORATORY DATA, AND COMMENT PERIOD EXTENSION</u>	RESPONSE TO COMMENTS	BRIAN GREY (REGULATOR)	7/28/2022	
<u>EMAIL FROM SEVEN SPRINGS CONFIRMING RECEIPT OF FILES</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/28/2022	
<u>EMAIL TRANSMITTAL TO SEVEN SPRINGS AND FOX CAPITAL MANAGEMENT CORPORATION OF REQUESTED FILES</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/27/2022	
<u>EMAIL FROM SEVEN SPRINGS RE SEVEN SPRINGS REQUEST FOR AECOM DOCUMENTS AND LABORATORY DATA RE PROPOSED CAOS - REQUESTS DOCUMENTS REFERENCED IN ATTACHMENT B OF THE PROPOSED CAO, LABORATORY DATA FROM REGIONAL BOARD'S SOIL GAS INVESTIGATION, AND AN EXTENSION TO THE COMMENT PERIOD CONTINGENT ON PRODUCTION OF THE SOIL GAS DATA.</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	7/25/2022	
<u>EMAIL STRING WITH REISCH REGARDING RECORDS REQUEST, TRANSFER, AND RECEIPT OF FILES</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/27/2022	
<u>COMMENT PERIOD EXTENDED</u>	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	6/27/2022	
<u>EMAIL TRANSMITTAL FROM SEVEN SPRINGS RE REQUEST FOR COMMENTS-CLEANUP AND ABATEMENT ORDERS R6T-2022- (PROPOSED) FOR THE LTLW, FORMER BIG O TIRES, AND FORMER NOMA'S CLEANERS SITES - REQUEST FOR (1) COPIES OF THE SUPPORTING DOCUMENTS REFERENCED IN THE PROPOSED CLEANUP AND ABATEMENT ORDER (CAO) FOR LAKE TAHOE LAUNDRY WORKS AND (2) AN EXTENSION TO THE COMMENT PERIOD FOR PROPOSED CAOS FOR LAKE TAHOE LAUNDRY WORKS, BIG O TIRES, AND FORMER NORMA'S CLEANERS</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	6/24/2022	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EMAIL TRANSMITTAL RE FOX'S REQUESTS RE PROPOSED CAOS - REQUEST FOR (1) COPIES OF THE SUPPORTING DOCUMENTS REFERENCED IN THE PROPOSED CLEANUP AND ABATEMENT ORDER (CAO) FOR LAKE TAHOE LAUNDRY WORKS AND (2) AN EXTENSION TO THE COMMENT PERIOD FOR PROPOSED CAOS FOR LAKE TAHOE LAUNDRY WORKS, BIG O TIRES, AND FORMER NORMA'S CLEANERS	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	6/22/2022	
REQUEST FOR COMMENTS- CLEANUP AND ABATEMENT ORDER R6T-2022-(PROPOSED)	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	6/16/2022	
EMAIL FROM PETE GORMAN OF PES ENVIRONMENTAL RE LTLW PPRS WILL BE SUSPENDING SUBMITTAL OF PLANNING AND PROGRESS REPORTS UNTIL FURTHER WARRANTED.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	5/10/2022	
PLANNING AND PROGRESS REPORT NO. 63	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	5/4/2022	
PLANNING AND PROGRESS REPORT NO. 62	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	4/5/2022	
SSLP COMMENTS ON STPUD'S DRAFT ALTERNATIVE PLAN FOR TAHOE VALLEY SOUTH SUBBASIN (6-005.01) FIRST FIVE YEAR UPDATE	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	3/11/2022	
EMAIL RE LAHONTAN WATER BOARD STAFF ACKNOWLEDGEMENT OF DECEMBER 20, 2021 RESPONSE LETTER. INDICATES PUBLIC COMMENT PERIOD FOR DRAFT GENERAL ORDER FOR IN-SITU AND EX-SITU GROUNDWATER REMEDIATION PROJECTS IS FROM MARCH 11 TO APRIL 12, 2022. PROVIDES LINK TO DRAFT GENERAL ORDER.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/10/2022	
PLANNING AND PROGRESS REPORT NO. 61	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	3/9/2022	
EMAIL RE SCP INVOICE NO. SC 128518, ACCOUNT NO. 2060012- JAN 21, 2022 NOTICE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/2/2022	
EMAIL STRING RE PLANNING AND PROGRESS REPORT NO 60 (REVISION 2). EMAIL STRING INCLUDES TRANSMITTAL OF PLANNING AND PROGRESS REPORT NO. 60 (REVISION 2)	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	2/22/2022	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
REVISED INDOOR AIR SAMPLING WORK PLAN	OTHER WORKPLAN	KYLE FLORY (AUTH_R P)	2/22/2022	4,806 KB
EMAIL REGARDING PPR NO. 60 REVISED. PROVIDES CLARIFICATION OF PPR NO 60 REVISIONS.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/17/2022	
PLANNING AND PROGRESS REPORT NO. 60 (REVISED)	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	2/16/2022	
PLANNING AND PROGRESS REPORT NO. 60	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	2/7/2022	
EMAIL STRING RE REQUEST FOR EVS MODEL PREPARED FOR SOUTH Y INVESTIGATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/28/2022	
EMAIL FROM TARANTINO RE REQUEST FOR MEETING- REMEDIATION AT THE LAKE TAHOE LAUNDRY WORKS SITE AND THE TAHOE VALLEY SOUTH BASIN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/26/2022	
EMAIL TO TARANTINO RE STATUS OF DRAFT GENERAL ORDER	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/26/2022	
PLANNING AND PROGRESS REPORT NO. 59	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	1/11/2022	
EMAIL FROM PETE GORMAN OF PES RE REQUEST FOR EVS MODEL PREPARED FOR SOUTH Y INVESTIGATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/11/2022	
WATER BOARD RESPONSE TO WILLIAM TARANTINO EMAIL DATED DECEMBER 20, 2021	STAFF LETTER	JEFF BROOKS (REGULATOR)	1/7/2022	
EMAIL FROM WILLIAM TARANTINO RE UPDATED COMMENTS- LAKE TAHOE LAUNDRY WORKS REMEDIATION EVALUATION WORK PLAN CASE NO. T6S043	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/20/2021	
PLANNING AND PROGRESS REPORT NO. 58	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	12/14/2021	
EMAIL STRING WITH JUSTIN FISCH REGARDING COMMENTS ON REMEDIATION EVALUATION WORK PLAN AND DRAFT GENERAL ORDER FOR IN-SITU GROUNDWATER REMEDIATION PROJECTS.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/29/2021	
NOTICE OF DEFICIENT WORKPLAN (INDOOR AIR SAMPLING WORK PLAN)	STAFF LETTER	BRIAN GREY (REGULATOR)	11/16/2021	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
PROGRESS AND PLANNING REPORT NO. 57	PROGRESS REPORT (SOIL/GW/UPDATES)	KYLE FLORY (AUTH_R P)	11/16/2021	147 KB
EMAIL FROM ANDY SAFFORD OF EKI TRANSMITTING COMMENTS ON AECOM SOIL GAS INVESTIGATION WORK PLAN	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	11/16/2021	
PLANNING AND PROGRESS REPORT NO. 57	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	11/16/2021	
NOTICE OF DEFICIENT WORKPLAN (REMEDIATION EVALUATION WORKPLAN)	STAFF LETTER	BRIAN GREY (REGULATOR)	11/16/2021	
PROGRESS AND PLANNING REPORT NO. 56	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/19/2021	
EMAIL FROM PETE GORMAN OF PES RE HURZEL SITE-PES COMMENTS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/14/2021	
INDOOR AIR SAMPLING WORK PLAN	SOIL VAPOR INTRUSION INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	9/27/2021	
INDOOR AIR SAMPLING WORK PLAN	OTHER WORKPLAN	KYLE FLORY (AUTH_R P)	9/24/2021	4,310 KB
PROGRESS AND PLANNING REPORT NO. 55	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	9/21/2021	
EMAIL FROM FLORY OF PES ENVIRONMENTAL, INC., RE: FORMER BIG O TIRES SITE -PES COMMENTS ON DRAFT AGENDA	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	9/19/2021	
EMAIL FROM SCOTT REISCH TRANSMITTING POWERPOINT PRESENTATION GIVEN TO LEGAL COUNSEL ON 8/19 AND HAKANSSON AFFIDAVIT.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/20/2021	
EMAIL STRING BETWEEN JULY 23 AND AUGUST 19, 2021 REGARDING A REQUEST FOR MEETING.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/18/2021	
EMAIL FROM FLORY TRANSMITTING COMMENTS ON STPUD RESPONSIVENESS SUMMARY DATED JUNE 12, 2020	CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/15/2021	
REMEDIATION EVALUATION WORKPLAN FOR CHLORINATED VOCs IN MIDDLE ZONE GROUNDWATER	PILOT STUDY / TREATABILITY WORKPLAN	KYLE FLORY (AUTH_R P)	8/12/2021	17,507 KB
PROGRESS AND PLANNING REPORT NO. 53	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	7/27/2021	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
PLANNING AND PROGRESS REPORT NO. 52	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	6/29/2021	
EMAIL FROM KYLE FLORY OF PES ENVIRONMENTAL RE BOT-WHA REVISED PHASE 2 WORK PLAN	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	6/8/2021	
PROGRESS AND PLANNING REPORT NO. 51	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	6/1/2021	
COMMENTS ON RMC GEOSCIENCE, INC. SOIL VAPOR PROBE INVESTIGATION REPORT, HURZEL PROPERTIES, LLC.	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	5/14/2021	
RESPONSE TO WEISS ASSOCIATES COMMENTS REGARDING SOUTHY BASIN AQUIFER PCE SOUTH LAKE TAHOE, CALIFORNIA	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	5/14/2021	
PROGRESS AND PLANNING REPORT NO. 50	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	5/4/2021	
PLANNING AND PROGRESS REPORT NO. 49	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	4/6/2021	
RE: SUBMISSION OF REPORTS FOR LAKE TAHOE LAUNDRY WORKS (SSL0601754315)	SOIL AND WATER INVESTIGATION REPORT	BRIAN GREY (REGULATOR)	4/1/2021	
SUBMISSION OF REPORTS FOR LAKE TAHOE LAUNDRY WORKS (SSL0601754315)	CORRESPONDENCE	KYLE FLORY (AUTHOR)	4/1/2021*	4,303 KB
PLANNING AND PROGRESS REPORT NO. 48	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	3/9/2021	
PLANNING AND PROGRESS REPORT NO. 47	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	2/9/2021	
PLANNING AND PROGRESS REPORT NO. 46	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	1/12/2021	
EMAIL STRING RE SVE/GASS OPERATIONS UPDATE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/17/2020	
EMAIL FROM GORMAN RE PRELIMINARY ESI FOLLOW-UP	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/17/2020	
PROGRESS AND PLANNING REPORT NO. 45	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	12/15/2020	
EX PARTE MINUTE ORDER (SEVEN SPRINGS)	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	12/8/2020	
PLANNING AND PROGRESS REPORT NO 44	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	11/17/2020	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
SEVEN SPRINGS VS LWRQCB FINAL RULING	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	11/9/2020	
EMAIL TO FLORY RE ELECTRONIC SUBMITTAL OF INFORMATION (ESI) ISSUE SUMMARY	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/28/2020	
EMAIL TO WEISS ASSOCIATES RE ACKNOWLEDGEMENT OF RECEIPT OF OCTOBER 21, 2020 COMMENTS ON APRIL 3, 2020 INVESTIGATION SUMMARY REPORT AND FEBRUARY 20, 2020 PES & EKI LETTER	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/21/2020	
WEISS ASSOCIATES EMAIL RE SOUTH Y TECHNICAL REPORT SUBMITTAL TO THE LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD WEISS RESPONSE TO THE APRIL 3, 2020 INVESTIGATION SUMMARY REPORT AND FEBRUARY 20, 2020 PES & EKI LETTER	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	10/21/2020	
PROGRESS AND PLANNING REPORT NO. 43.	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/20/2020	
PLANNING AND PROGRESS REPORT NO. 42	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	9/22/2020	
SEVEN SPRINGS LP V LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD TENTATIVE RULING #1	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	9/18/2020	
EMAIL FROM SCOTT REISCH REQUESTING A COPY OF THE EL DORADO SUPERIOR COURT'S DECISION IN FOX CAPITAL MANAGEMENT CORP. V. LAHONTAN REGIONAL WATER QUALITY BOARD, (NO. SC20170189, EL DORADO SUPER. CT.), DATED JUNE 1, 2020, BE PLACED ON GEOTRACKER.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/15/2020	
PLANNING AND PROGRESS REPORT NO. 41	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	8/25/2020	
EMAIL TO SEVEN SPRINGS AND PES ENVIRONMENTAL COMMENTING ON APRIL 3, 2020 INVESTIGATION SUMMARY REPORT AND OCTOBER 4, 2019 INVESTIGATION SUMMARY REPORT	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/12/2020	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EMAIL STRING REGARDING ISSUE WITH QUARTERLY MONITORING EVENT. RESCHEDULED FOR AUGUST 12.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/3/2020	
PROGRESS AND PLANNING REPORT #40	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	7/28/2020	
PLANNING AND PROGRESS REPORT NO. 39	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	6/30/2020	
PLANNING AND PROGRESS REPORT NO. 38	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	6/2/2020	
EL DORADO SUPERIOR COURT - FOX CAPITAL VS LRWQCB TENTATIVE MERITS RULING	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	6/1/2020	
MAY 19, 2020 LIMITED IN-SITU CHEMICAL OXIDATION PILOT TEST REPORT OF FINDINGS	INTERIM REMEDIAL ACTION REPORT	BRIAN GREY (REGULATOR)	5/21/2020	
PLANNING AND PROGRESS REPORT NO. 37	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	5/5/2020	
ACKNOWLEDGEMENT OF SUBMITTAL EMAIL TO SAFFORD RE: APRIL 24, 2020 SUPPLEMENTAL COMMENTS ON KENNEDY JENKS CONSULTANTS INC.'S DRAFT INTERIM REMEDIAL ACTION PLAN (IRAP) AND SOUTH Y PCE FACILITIES FEASIBILITY STUDY (FS) AND APRIL 16, 2020 COMMENTS ON KENNEDY JENKS CONSULTANTS INC.'S DRAFT INTERIM REMEDIAL ACTION PLAN (IRAP) AND SOUTH Y PCE FACILITIES FEASIBILITY STUDY (FS)	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/29/2020	
COMMENTS ON KENNEDY JENKS CONSULTANTS INC.'S DRAFT INTERIM REMEDIAL ACTION PLAN (IRAP) AND SOUTH Y PCE FACILITIES FEASIBILITY STUDY (FS) - PES ENVIRONMENTAL ON BEHALF OF SEVEN SPRINGS LIMITED PARTNERSHIP AND FOX CAPITAL MANAGEMENT CORPORATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/16/2020	
EMAIL FROM PES (GORMAN) RE DRAFT ISCO MONITORING RESULTS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/15/2020	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EMAIL TO INTERESTED PARTIES TRANSMITTING LINK TO APRIL 3, 2020 INVESTIGATION SUMMARY REPORT	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/10/2020	
PLANNING AND PROGRESS REPORT NO. 36	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	4/7/2020	
INVESTIGATION SUMMARY REPORT	REMEDIAL INVESTIGATION REPORT	EKI STAFF (AUTH_RP)	4/3/2020	64,016 KB
SCHEDULE EXTENSION CAO RGT 2017 0022	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	4/3/2020	
EMAIL STRING WITH JED BORGHEI REGARDING REPORT RESUBMITTAL	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/19/2020	
EMAIL FROM FLORY RE TWG 2 27 MEETING NOTES AND LBWC#4 DESTRUCTION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/18/2020	
REPORT RESUBMITTAL LETTER - EKI/PES	STAFF LETTER	BRIAN GREY (REGULATOR)	3/18/2020	
REPORT RESUBMITTAL LETTER-WEISS ASSOCIATES	STAFF LETTER	BRIAN GREY (REGULATOR)	3/18/2020	
PLANNING AND PROGRESS REPORT NO. 35	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	3/10/2020	
SOUTH Y PCE TECHNICAL MEETING - FACE TO FACE TECHNICAL MEETING INCLUDING WATER PURVEYORS, CITY OF SLT, STATE AND REGIONAL WATER BOARD, AND CONSULTANTS	MEETING	BRIAN GREY (REGULATOR)	2/27/2020	
FACE TO FACE MEETING WITH CONSULTANTS AND RESPONSIBLE PARTY REPRESENTATIVES	MEETING	BRIAN GREY (REGULATOR)	2/21/2020	
LTLWS WORKING PARTIES RESPONSE TO WEISS ASSOCIATES LETTERS REGARDING SOUTH Y BASIN AQUIFER PCE	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	2/20/2020	
PLANNING AND PROGRESS REPORT NO. 34	PROGRESS REPORT (SOIL/GW/UPDATES)	JEFF BROOKS (REGULATOR)	2/13/2020	
PLANNING AND PROGRESS REPORT NO. 33	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	1/15/2020	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
LETTER FROM WEISS ASSOCIATES RE: SOUTH Y BASIN AQUIFER PCE COMMENTS FROM WEISS ASSOCIATES SUBMITTED ON BEHALF OF LUKINS BROTHERS WATER COMPANY IN RESPONSE TO THE OCTOBER 4, 2019 INVESTIGATION SUMMARY REPORT	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	12/20/2019	
PLANNING AND PROGRESS REPORT NO. 32	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	12/17/2019	
EMAIL RESPONSE TO NOVEMBER 19, 2019 RESPONSE TO RWQCB'S OCTOBER 29, 2019 COMMENTS REGARDING THE JULY 31, 2019 WORKPLAN TO PERFORM LIMITED IN-SITU CHEMICAL OXIDATION PILOT TEST FROM PES. STAFF CONCURS WITH PROPOSED WORK PLAN MODIFICATIONS AND COLLECTION OF DEPTH TO WATER AND VISUAL OBSERVATIONS TO EVALUATE OXIDANT DISTRIBUTION.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/11/2019	
EMAIL FROM WATER BOARD TO WORKING PARTIES RE DATA SHARING/REQUESTS - SOUTH Y REGIONAL PCE INVESTIGATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/20/2019	
RESPONSE TO RWQCB'S OCTOBER 29, 2019 COMMENTS REGARDING THE JULY 31, 2019 WORKPLAN TO PERFORM LIMITED IN-SITU CHEMICAL OXIDATION PILOT TEST	CORRESPONDENCE	KYLE FLORY (AUTHOR)	11/19/2019	710 KB
EMAIL FROM PES RE: LTLW RESPONSE TO WATER BOARD OCTOBER 29, 2019 CONDITIONAL APPROVAL LETTER	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/19/2019	
PROGRESS AND PLANNING REPORT NO. 31	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	11/19/2019	
PLANNING AND PROGRESS REPORT NO. 30	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/29/2019	
COMMENTS ON JULY 31, 2019 WORKPLAN TO PERFORM LIMITED IN-SITU CHEMICAL OXIDATION PILOT TEST	STAFF LETTER	BRIAN GREY (REGULATOR)	10/29/2019	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EMAIL FROM JEFF BROOKS TO JUSTIN FISCH RE SOUTH Y INFORMATION SHARING. INCLUDES DRAFT LOGS FOR SONIC 1 THROUGH 7 LOCATIONS.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/21/2019	
EMAIL TO INTERESTED PARTIES RE LINK TO OCTOBER 4, 2019 INVESTIGATION SUMMARY REPORT	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/21/2019	
INVESTIGATION SUMMARY REPORT	SITE ASSESSMENT REPORT	EKI STAFF (AUTH_R P)	10/9/2019	39,053 KB
PLANNING AND PROGRESS REPORT NO. 29	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/8/2019	
RESPONSE TO WATER BOARD COMMENTS ON LTLW WORKING PARTIES 1 APRIL 2019 INVESTIGATION SUMMARY REPORT	RESPONSE TO COMMENTS	BRIAN GREY (REGULATOR)	10/7/2019	
SCHEDULE EXTENSION - DEADLINE OF OCTOBER 1, 2019 EXTENDED TO OCTOBER 4, 2019	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	10/3/2019	
EMAIL FROM JUSTIN FISCH RE DATA COMMUNICATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/2/2019	
REQUEST TO EXTEND OCTOBER 1, 2019 CAO DEADLINE FOR REPORT SUBMITTAL TO OCTOBER 4, 2019	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/23/2019	
PLANNING AND PROGRESS REPORT NO. 28	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	9/17/2019	
EMAIL TO JUSTIN FISCH RE; MAY 30, 2019 MEETING MINUTES	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/9/2019	
COMMENTS ON APRIL 1, 2019 INVESTIGATION SUMMARY REPORT	STAFF LETTER	BRIAN GREY (REGULATOR)	9/6/2019	
EMAIL STRING REGARDING MONITORING WELL CONSTRUCTION DETAILS AND DATA COMMUNICATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/5/2019	
PLANNING AND PROGRESS REPORT NO. 27	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/27/2019	
PLANNING AND PROGRESS REPORT NO. 26	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/7/2019	
WORKPLAN TO PERFORM LIMITED IN-SITU CHEMICAL OXIDATION PILOT TEST	PILOT STUDY / TREATABILITY WORKPLAN	PHIL GOALWIN (AUTH_RP)	7/31/2019	4,538 KB

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>UPDATE FROM E2CR RE JULY 5, 2019 WATER LEVELS AND SVE OPERATION</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/23/2019	
<u>PLANNING AND PROGRESS REPORT NO. 24</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	6/25/2019	
<u>EMAIL RE: MISSING LID AND SVE OPERATION/GW ELEVATION UPDATES</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/19/2019	
<u>PLANNING AND PROGRESS REPORT NO. 23</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	6/4/2019	
<u>FACE TO FACE MEETING WITH LAKE TAHOE LAUNDRY WORKS REPRESENTATIVES AND CONSULTANTS</u>	MEETING	BRIAN GREY (REGULATOR)	5/30/2019	
<u>PLANNING AND PROGRESS REPORT NO. 22</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	5/21/2019	
<u>SOUTH Y PCE TECHNICAL MEETING</u>	MEETING	BRIAN GREY (REGULATOR)	5/13/2019	
<u>EMAIL FROM E2CR RE GROUNDWATER LEVELS AND SVE SYSTEM OPERATION</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	5/7/2019	
<u>PLANNING AND PROGRESS REPORT NO. 21</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	5/7/2019	
<u>PROGRESS AND PLANNING REPORT NO. 20</u>	REMEDIAL PROGRESS REPORT	BRIAN GREY (REGULATOR)	4/23/2019	
<u>EMAIL FROM E2CR RE LTLW WATER LEVEL MEASUREMENTS</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/19/2019	
<u>PROGRESS AND PLANNING REPORT NO 19</u>	REMEDIAL PROGRESS REPORT	BRIAN GREY (REGULATOR)	4/9/2019	
<u>EMAIL TO INTERESTED PARTIES RE; INVESTIGATION SUMMARY REPORT-FORMER LAKE TAHOE LAUNDRY WORKS</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/5/2019	
<u>EMAIL FROM E2CR RE LTLW SVE SYSTEM SHUT DOWN DURING HIGH WATER EMAIL RESPONSE FROM LAHONTAN WATER BOARD E2CR WILL CHECK WATER LEVELS AND PROVIDE BRIEF EMAIL STATUS REPORTS ON A BIWEEKLY BASIS UNTIL SYSTEM CAN BE TURNED BACK ON.</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/1/2019	
<u>INVESTIGATION SUMMARY REPORT</u>	SITE ASSESSMENT REPORT	BRIAN GREY (REGULATOR)	4/1/2019	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
DFA RESPONSE TO PES EMAIL RE PRA REQUEST	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/26/2019	
EMAIL FROM PES TO DFA RE STATUS OF PRA REQUEST	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/26/2019	
PROGRESS AND PLANNING REPORT NO. 18	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	3/25/2019	
EMAIL FROM EKI TRANSMITTING PROGRESS AND PLANNING REPORT NO. 17	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	3/12/2019	
EMAIL FROM PES TO DFA RE PUBLIC RECORDS ACT REQUEST - PROPOSITION 1 GROUNDWATER GRANT FUNDING FOR SOUTH TAHOE PUBLIC UTILITY DISTRICT	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/7/2019	
EMAIL FROM STPUD TO PES RE SOUTH Y SEWER LINE CCTV SURVEY - DRAFT REIMBURSEMENT AGREEMENT	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/5/2019	
EMAIL FROM STPUD TO PES RE REQUEST FOR ACCESS- SOUTH Y SEWER LINE CCTV SURVEY.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/28/2019	
EMAIL FROM PES TO STPUD RE: REQUEST FOR ACCESS - SOUTH Y SEWER LINE CCTV SURVEY	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/27/2019	
EMAIL FROM EKI RE BOREHOLE LOGS. EKI REQUESTING INFORMATION RELATED TO TAHOE ASPHALT AND USA GASOLINE SITES. EMAIL STRING TO 3/8/19- CONTAINS REQUESTED AND ADDITIONAL INFORMATION RELATED TO INITIAL REQUEST	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/27/2019	
EMAIL FROM STPUD TO PES RE: REQUEST FOR ACCESS - SOUTH Y SEWER LINE CCTV SURVEY. CONTAINS PROPOSED APPROACH TO GLORENE AREA SEWER INVESTIGATION.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/26/2019	
EMAIL FROM EKI TRANSMITTING PPR NO 16	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	2/26/2019	
EMAIL TO STPUD RE REQUEST FOR ACCESS- SOUTH Y SEWER LINE CCTV SURVEY	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/14/2019	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
WEISS ASSOCIATES- COMMENTS ON CLEANUP AND ABATEMENT ORDER (CAO) RGT-2017-0022	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/13/2019	
PROGRESS AND PLANNING REPORT NO. 15	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	2/12/2019	
EMAIL FROM STPUD RE REQUEST FOR ACCESS- SOUTH Y SEWER LINE CCTV SURVEY	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/11/2019	
FACE TO FACE MEETING	MEETING	BRIAN GREY (REGULATOR)	2/6/2019	
COMMENTS ON PROGRESS AND PLANNING REPORT NO. 14	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/1/2019	
PROGRESS AND PLANNING REPORT NO. 14	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	1/29/2019	
PROGRESS AND PLANNING REPORT NO. 13	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	1/15/2019	
REQUEST FOR ASSISTANCE WITH ACCESS. FORMER BIG O, 1961 LAKE TAHOE BOULEVARD	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	1/14/2019	
REVISED PROGRESS AND PLANNING REPORT NO. 12	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	1/4/2019	
PROGRESS PLANNING REPORT NO. 12	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	1/2/2019	
EMAIL FROM STPUD (STANLEY) TRANSMITTING RESPONSE TO PES'S REQUEST FOR SEWER ACCESS. INCLUDES ATTACHMENTS FROM 1990S SEWER LINE INVESTIGATIONS.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/21/2018	
PROGRESS AND PLANNING REPORT NO. 11	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	12/18/2018	
EMAIL PROVIDING COMMENTS ON THE DECEMBER 6, 2018 MEETING NOTES AND DECEMBER 5, 2018 HISTORICAL GROUNDWATER ELEVATION ASSESSMENT	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/17/2018	
EMAIL FROM HOFFEY RE LTLW MEETING NOTES DECEMBER 6 CALL	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/12/2018	
EMAIL FROM PES TO STPUD RE SOUTH Y AREA-ACCESS TO SANITARY SEWER FOR CCTV VIDEO SURVEY	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/11/2018	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>EMAIL STRING WITH PES (GORMAN) RE PPR/CALL SCHEDULE AND PASSIVE SOIL VAPOR WORK</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	12/11/2018	
<u>PHASE I HISTORICAL GROUNDWATER ELEVATION ASSESSMENT</u>	TECHNICAL MEMOS	BRIAN GREY (REGULATOR)	12/5/2018	
<u>PROGRESS AND PLANNING REPORT NO. 10</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	12/4/2018	
<u>EMAIL FROM PES (FLORY) PROVIDING REQUEST FOR SITE ACCESS LETTERS DISCUSSED IN PPR NO 9</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/28/2018	
<u>PROGRESS AND PLANNING REPORT NO. 9</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	11/27/2018	
<u>PROGRESS AND PLANNING REPORT NO. 8</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	11/20/2018	
<u>COMMENTS ON PROGRESS AND PLANNING REPORT NO 7 AND OS WELL GROUNDWATER RESULTS</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/19/2018	
<u>PROGRESS AND PLANNING REPORT NO. 7</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	11/13/2018	
<u>PREFERENTIAL PATHWAY EVALUATION WORK PLAN STAGE 1- CLOSED CIRCUIT TELEVISION SURVEY DVD</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	11/7/2018	
<u>PROGRESS AND PLANNING REPORT NO. 6</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	11/6/2018	
<u>EMAIL STRING BETWEEN PES/LAHONTAN REGARDING SCHEDULING FACE TO FACE TECHNICAL MEETING</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/31/2018	
<u>PROGRESS AND PLANNING REPORT NO. 5</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/30/2018	
<u>EMAIL STRING BETWEEN REISCH AND FERGUSON RE: COMMENTS ON WEEKLY PLANNING AND PROGRESS REPORTS WITH REQUEST FOR FACE TO FACE TECHNICAL MEETING</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/30/2018	
<u>COMMENTS ON WEEKLY PLANNING AND PROGRESS REPORTS WITH REQUEST FOR FACE TO FACE TECHNICAL MEETING</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/29/2018	
<u>PROGRESS AND PLANNING REPORT NO. 4</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/23/2018	
<u>PROGRESS AND PLANNING REPORT NO. 2 REVISED</u>	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/17/2018	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
PROGRESS AND PLANNING REPORT NO. 3	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/16/2018	
COMMENTS ON WEEKLY PROGRESS REPORTS, PREFERENTIAL PATHWAY EVALUATION WORK PLAN, AND REVISED PRELIMINARY PLANNING REPORT AND PROGRESS AND PLANNING SCHEDULE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/16/2018	
EMAIL RE: CORRECTION TO INVOICE SC-109397	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/12/2018	
PROGRESS AND PLANNING REPORT NO. 2	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/9/2018	
PROGRESS AND PLANNING REPORT NO. 1 AND REVISED PRELIMINARY PLANNING REPORT AND PROGRESS AND PLANNING SCHEDULE	PROGRESS REPORT (SOIL/GW/UPDATES)	BRIAN GREY (REGULATOR)	10/1/2018	
EMAIL TO INTERESTED PARTIES - SEPTEMBER 28, 2018 PREFERENTIAL PATHWAY EVALUATION WORK PLAN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/1/2018	
PREFERENTIAL PATHWAY EVALUATION WORK PLAN	OTHER WORKPLAN	BRIAN GREY (REGULATOR)	9/28/2018	
EMAIL FROM SCOTT REISCH RE: SEPTEMBER 21, 2018 TELECONFERENCE FOLLOW-UP AND DISCUSSION SUMMARY	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/28/2018	
SEPTEMBER 21, 2018 TELECONFERENCE FOLLOW-UP AND DISCUSSION SUMMARY.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/25/2018	
SCHEDULE EXTENSION-PREFERENTIAL PATHWAY EVALUATION	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	9/20/2018	
LTLW- REQUEST FOR EXTENSION RE PREFERENTIAL PATHWAY EVALUATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/18/2018	
PRELIMINARY PLANNING REPORT AND PROGRESS AND PLANNING REPORT SCHEDULE	SOIL AND WATER INVESTIGATION WORKPLAN - ADDENDUM	BRIAN GREY (REGULATOR)	9/14/2018	
SCHEDULE EXTENSION- PRELIMINARY PLANNING REPORT AND PROGRESS AND PLANNING REPORT SCHEDULE	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	9/10/2018	
RE: LTLW CONDITIONAL ACCEPTANCE LETTER - REQUEST FOR EXTENSION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/6/2018	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
TELECONFERENCE FOLLOW-UP EMAIL TO LTLW RPS/CONSULTANTS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/31/2018	
2018-19 ANNUAL ESTIMATION LETTER	ANNUAL ESTIMATION LETTER	JEFF BROOKS (REGULATOR)	8/27/2018	
EMAIL TO INTERESTED PARTIES- AUGUST 22, 2018 CONDITIONAL ACCEPTANCE OF MARCH 19, 2018 AMENDED GROUNDWATER INVESTIGATION WORK PLAN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/23/2018	
EMAIL TO RESPONSIBLE PARTIES TRANSMITTING SUGGESTIONS FOR COMPLIANCE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/23/2018	
CONDITIONAL ACCEPTANCE OF MARCH 19, 2018 AMENDED GROUNDWATER INVESTIGATION WORK PLAN	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	8/22/2018	
CORRECTION TO INVOICE NUMBER SC-109397	ARBITRATION/DISPUTE RESOLUTION	BRIAN GREY (REGULATOR)	6/25/2018	
FACE TO FACE MEETING WITH LAKE TAHOE LAUNDRY WORKS RESPONSIBLE PARTIES AND CONSULTANTS	MEETING	BRIAN GREY (REGULATOR)	5/23/2018	
JOINT SUBMITTAL FROM LUKINS BROTHERS, SOUTH TAHOE PUD, AND TAHOE KEYS POA RE: SUGGESTED LIST OF CONDITIONS TO REQUIRE IN CONJUNCTION WITH THE LAKE TAHOE LAUNDRY WORK'S AMENDED GROUNDWATER INVESTIGATION WORK PLAN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	5/11/2018	
SOUTH TAHOE PUBLIC UTILITY DISTRICT'S COMMENTS ON THE AMENDED GROUNDWATER INVESTIGATION WORK PLAN DATED MAY 10, 2018	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	5/11/2018	
TELECONFERENCE WITH WORKING PARTIES AND CONSULTANTS REGARDING SB445 DRAFT SCOPE OF WORK	MEETING	BRIAN GREY (REGULATOR)	5/9/2018	
MEETING WITH WATER PURVEYORS TO DISCUSS DRAFT SB445 SCOPE OF WORK	MEETING	BRIAN GREY (REGULATOR)	5/9/2018	
MEETING WITH STPUD, LUKINS, TKPOA, AND CITY OF SLT	MEETING	BRIAN GREY (REGULATOR)	5/3/2018	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
APRIL 11, 2018 COMMENTS ON AMENDED GROUNDWATER INVESTIGATION WORK PLAN SUBMITTED BY TRC SOLUTIONS, INC. ON BEHALF OF LUKINS BROTHERS WATER COMPANY, INC.	CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/11/2018	
EMAIL TO INTERESTED PARTIES TRANSMITTING PRINTABLE AND SEARCHABLE COPY OF AMENDED GROUNDWATER INVESTIGATION WORK PLAN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/21/2018	
MARCH 19, 2018 AMENDED GROUNDWATER INVESTIGATION WORK PLAN	SITE INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	3/19/2018	
2017-18 ANNUAL ESTIMATION LETTER	ANNUAL ESTIMATION LETTER	JEFF BROOKS (REGULATOR)	2/20/2018	
NOTICE OF CONTINUED NON-COMPLIANCE WITH CLEANUP AND ABATEMENT ORDER (CAO) NO. R6T-2017-0022	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	2/1/2018	
MEETING WITH FOX, SEVEN SPRINGS, PES, AND EKI TO DISCUSS RESPONSE TO REVISED GROUNDWATER INVESTIGATION WORK PLAN AND PATH FORWARD.	MEETING	BRIAN GREY (REGULATOR)	1/24/2018	
LTLW - MATERIALS FOR JANUARY 24, 2018 MEETING	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/23/2018	
EMAIL TO INTERESTED PARTIES - JANUARY 11, 2018 RESPONSES TO COMMENTS REGARDING REVISED GROUNDWATER INVESTIGATION WORK PLAN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/12/2018	
EMAIL FROM EKI ENVIRONMENT & WATER CONTAINING JANUARY 11, 2018 RESPONSES TO COMMENTS REGARDING REVISED GROUNDWATER INVESTIGATION WORK PLAN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/11/2018	
EMAIL FROM PES REGARDING GROUNDWATER INVESTIGATION SCHEDULE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/29/2017	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EMAIL FROM FOX AND SEVEN SPRINGS REGARDING AS/SVE SHUTDOWN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/10/2017	
EMAIL STRING FROM PES REGARDING DRILLING ISSUES AND SCHEDULING	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/10/2017	
EMAIL RESPONSE FROM BRAS REGARDING BATCH PUMPING AND SCHEDULE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/9/2017	
EMAIL TO PES REGARDING BATCH PUMPING	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/7/2017	
EMAIL TO INTERESTED PARTIES REGARDING STORM DRAIN SYSTEM INFORMATION UPLOAD TO GEOTRACKER	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/3/2017	
EMAIL TO E2CR REGARDING BATCH PUMPING SCHEDULE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/3/2017	
EMAIL RESPONSE TO 10 31 2017 PES EMAIL REGARDING NOVEMBER 15 DEADLINE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/3/2017	
STORM DRAIN INFORMATION	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	11/3/2017	
STORM DRAIN INFORMATION - REGULATOR RESPONSE	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	11/3/2017	
EMAIL FROM PES RE: LTLW-SCHEDULE OF FIELD ACTIVITIES FOR GROUNDWATER INVESTIGATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/31/2017	
GROUND ZERO - ADDITIONAL INFORMATION AND COMMENTS ON THE SEPTEMBER 11, 2017 EKI REVISED GROUNDWATER INVESTIGATION WORKPLAN	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	10/24/2017	
SOUTH TAHOE PUBLIC UTILITY DISTRICT'S COMMENTS ON THE REVISED GROUNDWATER INVESTIGATION WORKPLAN	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	10/10/2017	
LUKINS BROTHERS WATER COMPANY- SUPPLEMENTAL COMMENTS ON REVISED GROUNDWATER INVESTIGATION WORK PLAN	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	10/10/2017	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>TAHOE KEYS PROPERTY OWNERS ASSOCIATION -COMMENTS ON THE SEPTEMBER 11, 2017 EKI REVISED GROUNDWATER INVESTIGATION WORKPLAN</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	10/10/2017	
<u>ACCEPTANCE OF EXTENSION REQUEST TO SUBMIT COMMENTS ON REVISED GROUNDWATER INVESTIGATION WORK PLAN</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/28/2017	
<u>LUKINS BROTHERS WATER COMPANY - COMMENTS ON REVISED GROUNDWATER INVESTIGATION WORK PLAN</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	9/27/2017	
<u>NOTIFICATION OF BATCH PUMPING INITIATION</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/20/2017	
<u>CONDITIONAL ACCEPTANCE OF TASKS IN JULY 26, 2017 GROUNDWATER INVESTIGATION WORK PLAN</u>	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	9/15/2017	
<u>RESPONSE TO COMMENTS REGARDING PHASE 1 OF GROUNDWATER INVESTIGATION</u>	CORRESPONDENCE - RESPONSE TO COMMENTS	PHIL GOALWIN (AUTHORITY)	9/11/2017	177 KB
<u>REVISED GROUNDWATER INVESTIGATION WORK PLAN</u>	OTHER WORKPLAN	PHIL GOALWIN (AUTHORITY)	9/11/2017	6,569 KB
<u>PCE RESULTS FROM OFF-SITE MONITORING WELLS, SPRING 2017</u>	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	8/24/2017	
<u>PUBLIC INFORMATION MEETING LAKE TAHOE LAUNDRY WORKS CAO R6T-2017-0022/REGIONAL PCE POLLUTION</u>	MEETING	BRIAN GREY (REGULATOR)	8/23/2017	
<u>MEETING WITH RESPONSIBLE PARTIES AND CONSULTANT TO DISCUSS REVISED WORK PLAN AND PUBLIC INFORMATION MEETING. FOX/SEVEN SPRINGS WILL PROVIDE RESPONSE TO COMMENTS TO IMPLEMENT WORK PLAN TASKS AND DRAFT REVISED WORK PLAN.</u>	MEETING	BRIAN GREY (REGULATOR)	8/22/2017	
<u>NOTICE OF INCOMPLETE SUBMITTAL WITH REQUEST FOR REVISED WORK PLAN</u>	STAFF LETTER	BRIAN GREY (REGULATOR)	8/11/2017	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>STATE WATER BOARD RESPONSE TO SEVEN SPRINGS LIMITED PARTNERSHIP PETITION TO R6-2017-0022.</u>	RESPOND TO PETITION	JEFF BROOKS (REGULATOR)	8/7/2017	
<u>STATE WATER BOARD RESPONSE TO FOX CAPITAL MANAGEMENT CORPORATION PETITION TO R6T-2017-0022</u>	RESPOND TO PETITION	JEFF BROOKS (REGULATOR)	8/7/2017	
<u>NOTICE OF PUBLIC MEETING FOR STAKEHOLDERS AND INTERESTED PARTIES - MEETING ON AUGUST 23, 2017 9AM TO 12PM</u>	NOTIFICATION - PUBLIC PARTICIPATION DOCUMENT	JEFF BROOKS (REGULATOR)	7/28/2017	
<u>GROUNDWATER INVESTIGATION WORK PLAN</u>	OTHER WORKPLAN	PHIL GOALWIN (AUTHOR)	7/26/2017	5,092 KB
<u>OFF-SITE SAMPLING</u>	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	7/11/2017	
<u>OFF-SITE SAMPLING</u>	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	7/10/2017	
<u>OFF-SITE SAMPLING</u>	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	7/6/2017	
<u>MEETING WITH WATER PURVEYORS TO ANSWER QUESTIONS ABOUT CAO R6T-2017-0022 AND HEAR CONCERNS</u>	MEETING	BRIAN GREY (REGULATOR)	6/29/2017	
<u>CAO R6T-2017-0022</u>	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	5/12/2017	
<u>RESPONSE TO 2-28-17 RWQCB COMMENTS</u>	CORRESPONDENCE - RESPONSE TO COMMENTS	PHIL GOALWIN (AUTHOR)	4/4/2017*	3,962 KB
<u>PROPOSED CAO</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	3/8/2017	
<u>PROPOSED CAO</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	3/6/2017	
<u>PROPOSED CLEANUP AND ABATEMENT ORDER STATUS</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	3/3/2017	
<u>REPLY TO RESPONSE TO COMMENTS ON AIR SPARGE PERFORMANCE TEST AND DISCUSSION OF OFF-SITE PCE EXTENT</u>	STAFF LETTER	LISA DERNBACH (REGULATOR)	2/28/2017	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
REQUEST FOR SUPPLEMENTAL WORK PLAN	STAFF LETTER	LISA DERNBACH (REGULATOR)	1/4/2017	
PCE RESULTS FROM OFF-SITE MONITORING WELLS, FALL 2016	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	12/21/2016	
OFF-SITE SAMPLING	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	10/20/2016	
OFF-SITE SAMPLING	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	10/12/2016	
OFF-SITE SAMPLING	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	9/28/2016	
WORKPLAN TO PERFORM BATCH PUMPING	CAP/RAP - FINAL REMEDICATION / DESIGN PLAN	LISA DERNBACH (RE GULATOR)	9/9/2016	
COMMERCE BANK - LAKE TAHOE LAUNDRY WORKS' CAO COMMENTS: COMMENTS ON PROPOSED REVISIONS TO LAKE TAHOE LAUNDRY WORKS CLEANUP AND ABATEMENT ORDER NO. R6T-2016-PROP	CORRESPONDENCE	BRIAN GREY (REGULAT OR)	9/8/2016	
TKPOA - LAKE TAHOE LAUNDRY WORKS' CAO COMMENTS	CORRESPONDENCE	BRIAN GREY (REGULAT OR)	9/8/2016	
FOX CAPITAL MANAGEMENT CORPORATION - RESPONSE TO REVISED CLEANUP AND ABATEMENT ORDER	CORRESPONDENCE	BRIAN GREY (REGULAT OR)	9/8/2016	
EMAIL FROM KEVIN LEID RE: NAMING OF BOBBY PAGE CLEANERS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULAT OR)	8/9/2016	
REQUEST FOR COMMENTS ON REVISED PROPOSED CAO	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	8/9/2016	
RESPONSE TO COMMENTS ON AIR SPARGE PERFORMANCE TEST	CORRESPONDENCE - RESPONSE TO COMMENTS	PHIL GOALWIN (AUT H_RP)	7/27/2016	2,824 KB

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
PROPOSED REVISIONS TO LAKE TAHOE LAUNDRY WORKS CLEANUP AND ABATEMENT ORDER NO. R6T-2016-PROP ALSO INCLUDES: PROSECUTION TEAM RESPONSE TO COMMENTS PROPOSED NO FURTHER ACTION REQUIRED LETTER AND RESPONSE TO COMMENTS ON 60-DAY NOTICE FOR LAKESIDE NAPA AUTO STORE, 1935 LAKE TAHOE BOULEVARD PROPOSED NO FURTHER ACTION REQUIRED LETTER AND RESPONSE TO COMMENTS ON 60-DAY NOTICE FOR BIG O TIRES STORE #147, 1961 LAKE TAHOE BOULEVARD	CLEAN-UP AND ABATEMENT ORDER	LISA DERNBACH (REGULATOR)	7/18/2016	
COMMENTS ON AIR SPARGE PERFORMANCE TEST	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	5/24/2016	
COMPLETION OF TASKS IN STIPULATED AGREEMENT	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	2/17/2016	
COMMERCE BANK COMMENTS ON PROPOSED CLEANUP AND ABATEMENT ORDER NO. R6T-2015-PROP	CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/11/2016	
HOGAN LOVELLS - RESPONSE TO PROPOSED CLEANUP AND ABATEMENT ORDER FOR FORMER LAKE TAHOE LAUNDRY WORKS	CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/11/2016	
KOPANIA - COMMENTS ON DRAFT CAO FOR LAKE TAHOE LAUNDRY WORKS	CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/11/2016	
TKPOA - LAKE TAHOE LAUNDRY WORKS' CAO COMMENTS	CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/11/2016	
STPUD - COMMENTS IN RESPONSE TO THE REVISED REQUEST FOR COMMENTS-PROPOSED CLEANUP AND ABATEMENT ORDER	CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/10/2016	
LUKINS - COMMENTS IN RESPONSE TO PROPOSED CLEANUP AND ABATEMENT ORDER	CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/9/2016	
JANUARY 4,2016 O&M AIR SPARGE PERFORMMANCE TEST DATA SUMMARY	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUTHOR)	2/1/2016	1,476 KB

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EXTENSION OF COMMENT PERIOD FOR PROPOSED CLEANUP AND ABATEMENT ORDER	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	1/14/2016	
SUBMITTAL OF WORKPLAN FOR INDOOR AIR SAMPLING AT THE LTLW BUILDING - REGULATOR RESPONSE	OTHER WORKPLAN	LISA DERNBACH (REGULATOR)	12/18/2015	
EXTENSION GRANTED FOR CAO COMMENT PERIOD TO JAN. 15, 2016	DEADLINE EXTENSION	LISA DERNBACH (REGULATOR)	12/8/2015	
REQUEST TO EXTEND PUBLIC COMMENT PERIOD FOR DRAFT CAO	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	12/7/2015	
LAB RESULTS OF OFF-SITE MONITORING WELL SAMPLES	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	11/9/2015	
REVISED REQUEST FOR COMMENTS ON PROPOSED CAO	CLEAN-UP AND ABATEMENT ORDER	LISA DERNBACH (REGULATOR)	9/30/2015	
REQUEST FOR COMMENTS ON PROPOSED CLEANUP AND ABATEMENT ORDER	CLEAN-UP AND ABATEMENT ORDER	LISA DERNBACH (REGULATOR)	9/15/2015	
LAB RESULTS FOR HURZEL WELL-SOUTH (UPGRADIENT)	SITE VISIT / INSPECTION / SAMPLING	LISA DERNBACH (REGULATOR)	8/21/2015	
LAKE TAHOE LAUNDRY WORKS SETTLEMENT AGREEMENT FOR ALTERNATE WATER SUPPLY	SETTLEMENT AGREEMENT	LISA DERNBACH (REGULATOR)	6/15/2015	
SCHNEEWEIS PCE WELL RESULTS	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	2/12/2015	
WATER ANALYSIS FOR STANFORD SIERRA CAMP DOMESTIC WELL	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	1/30/2015	
WATER ANALYSIS FOR STANFORD SIERRA CAMPS DOMESTIC WELL	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	9/18/2014	
LAB RESULTS FOR 883 ELOISE AND 787 LAKE TAHOE BOULEVARD. SAMPLING CONDUCTED ON SEPTEMBER 11, 2014.	CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/17/2014	
HAND WRITTEN NOTE TO DON AND ANNA LANCE	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	9/16/2014	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
OVERSIGHT COST REIMBURSEMENT FOR SITE CLEANUP PROGRAM	COST RECOVERY AGREEMENT / N. OF REIMBURSEMENT	LISA DERNBACH (REGULATOR)	7/25/2014	
REQUEST FOR EXEMPTION TO PERMITTING	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUTHOR)	7/24/2014	211 KB
REQUEST FOR EXEMPTION TO PERMITTING	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUTHOR)	7/24/2014	211 KB
EMAIL FROM KYLE FLORY OF PES ENVIRONMENTAL TRANSMITTING CONTACT INFORMATION FOR FOX CAPITAL MANAGEMENT CORPORATION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/15/2014	
ACCEPTANCE OF PROPOSAL FOR REMEDIATION OPERATION CHANGE	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	4/9/2014	
ORDER REQUIRING REPORTS ON REMEDIATION SYSTEM OPERATIONS	13267 REQUIREMENT	LISA DERNBACH (REGULATOR)	11/1/2013	
ACCEPTANCE OF REMEDIATION WORKPLAN AND INVESTIGATIVE ORDER TO SUBMIT TECHNICAL REPORTS	13267 MONITORING PROGRAM	BRIAN GREY (REGULATOR)	8/2/2013	
REQUEST FOR PUBLIC COMMENTS FOR CLEANUP	NOTIFICATION - PUBLIC NOTICE OF ROD/RAP/CAP	BRIAN GREY (REGULATOR)	6/13/2013	
ADJACENT PROPERTY OWNER IDENTIFICATION FOR PUBLIC NOTICE	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUTHOR)	6/6/2013*	1,789 KB
OVERSIGHT COST REIMBURSEMENT PROGRAM	COST RECOVERY AGREEMENT / N. OF REIMBURSEMENT	LISA DERNBACH (REGULATOR)	9/13/2011	
INTERIM REMEDIAL SYSTEM INSTALLATION/PILOT TESTING REPORT OF FINDINGS AND DRAFT REMEDIAL ACTION PLAN FOR VADOSE ZONE SOIL AND SHALLOW GROUNDWATER CLEANUP	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUTHOR)	8/12/2010*	30,411 KB
CALTRANS E-PERMIT PACKAGE	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUTHOR)	2/8/2010*	1,571 KB
EL DORADO COUNTY ENVIRONMENTAL MANAGEMENT DEPARTMENT AIR QUALITY MANAGEMENT DISTRICT AUTHORITY TO CONSTRUCT PERMIT	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUTHOR)	1/22/2010*	175 KB

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EROSION AND SEDIMENT CONTROL PLAN IMPLEMENTATION OF INTERIM REMEDIAL ACTION WORKPLAN & INTERIM REMEDIAL ACTION WORKPLAN ADDENDUM	OTHER WORKPLAN	PHIL GOALWIN (AUT H_RP)	12/1/2009*	529 KB
AUTHORIZATION TO CONDUCT SOIL DISTURBANCE ACTIVITIES AFTER OCTOBER 15	STAFF LETTER	BRIAN GREY (REGULATOR)	10/15/2009	
GRADING VARIANCE WORKPLAN IMPLEMENTATION OF INTERIM REMEDIAL ACTION WORKPLAN & INTERIM REMEDIAL ACTION WORKPLAN ADDENDUM	OTHER WORKPLAN	PHIL GOALWIN (AUT H_RP)	9/24/2009*	639 KB
ACCEPTANCE OF INTERIM REMEDIAL ACTION WORKPLAN AND ADDENDUM	STAFF LETTER	BRIAN GREY (REGULATOR)	9/1/2009	
ADDENDUM TO INTERIM REMEDIAL ACTION WORKPLAN FOR SZA GROUNDWATER INVESTIGATION, SZA GROUNDWATER MONITORING, INTERIM REMEDIAL ACTION VADOSE ZONE SOIL AND SHALLOW GROUNDWATER CLEANUP	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUT H_RP)	8/26/2009*	740 KB
REMEDIAL ACTION WORKPLAN FOR SZA GROUNDWATER INVESTIGATION, SZA GROUNDWATER MONITORING, INTERIM REMEDIAL ACTION VADOSE ZONE SOIL AND SHALLOW GROUNDWATER CLEANUP	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUT H_RP)	6/4/2009*	9,236 KB
INVESTIGATIVE ORDER TO SUBMIT WORKPLAN FOR PCE REMEDIATION AND MONITORING	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	4/8/2009	
INVESTIGATIVE ORDER NO. R6T-2009-0013 TO SUBMIT WORKPLAN FOR REMEDIATION	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	4/8/2009	
SITE INVESTIGATION REPORT OF FINDINGS	OTHER REPORT / DOCUMENT	PHIL GOALWIN (AUT H_RP)	9/22/2008*	25,590 KB
PETITION OF BLACKROCK REALTY ADVISORS, INC., LAHONTAN WATER BOARD: DISMISSAL OF PETITION HELD IN ABEYANCE	PETITION DISMISSED BY EXECUTIVE DIRECTOR	BRIAN GREY (REGULATOR)	6/6/2007	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
PETITION FOR REVIEW OF SITE INVESTIGATION AT THE LAKE TAHOE LAUNDRY WORKS. LETTER RESPONDED TO PETITION FOR REVIEW OF RP STATUS. LETTER AGREES WITH PETITIONER THAT BLACK ROCK REALTY ADVISORS NOT CONSIDERED AN RP FOR CLEANUP AT SITE.	LETTER - NOTICE	BRIAN GREY (REGULATOR)	6/5/2007	
SITE INVESTIGATION RESULTS: MAY 27, 2005	REPORTS - INVESTIGATION RPT.	MAURA DOUGHERTY (A UTH_RP)	5/31/2007	4,497 KB
ADDITIONAL SOIL INVESTIGATION RESULTS	REPORTS - INVESTIGATION RPT.	MAURA DOUGHERTY (A UTH_RP)	5/31/2007	3,788 KB
PETITION OF BLACKROCK REALTY ADVISORS, INC., LAHONTAN WATER BOARD: APPROVAL OF REQUEST TO CONTINUE TO BE HELD IN ABEYANCE	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	4/12/2007	
PUBLIC RECORDS REQUEST	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/15/2007	
POSTPONEMENT OF CORRECTIVE ACTION WORKPLAN	STAFF LETTER	BRIAN GREY (REGULATOR)	7/14/2006	
LETTER FROM MORRISON FOERSTER RE: LAKE TAHOE LAUNDRY WORKS	CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/9/2006	
BOARD STAFF LETTER REQUIRES SUBMITTAL OF A CORRECTIVE ACTION PLAN BY JUNE 30, 2006.	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	4/18/2006	
ADDITIONAL SOIL INVESTIGATION RESULTS	SITE INVESTIGATION	BRIAN GREY (REGULATOR)	1/31/2006	
APPROVAL OF WORKPLAN FOR ADDITIONAL SOIL INVESTIGATION	STAFF LETTER	BRIAN GREY (REGULATOR)	11/4/2005	
WORKPLAN FOR ADDITIONAL SOIL INVESTIGATION	SOIL AND WATER INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	10/19/2005	
LETTER FROM MORRISON FOERSTER RE OWNERSHIP HISTORY	CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/5/2005	
COMMENTS ON WORKPLAN FOR ADDITIONAL SITE INVESTIGATION RESULTS	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	9/2/2005	
STAFF REPORT SOLVENT CONTAMINATION AT THE BIG O TIRES STORE	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	8/22/2005	
PETITION FOR REVIEW - LETTER TO ORRICK, HERRINGTON AND SUTCLIFF LLP ACKNOWLEDGING RECEIPT OF INFORMATION	STAFF LETTER	BRIAN GREY (REGULATOR)	7/20/2005	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>JUNE 2, 2005 LETTER FROM ORRICK, HERRINGTON & SUTCLIFF LLP TRANSMITTING PETITION FOR RECONSIDERATION RE:LAKE TAHOE LAUNDRY WORKS, COMMENTS ON WORKPLAN FOR SUPPLEMENTAL SITE INVESTIGATION DATED MARCH 7, 2005 PETITION FOR RECONSIDERATION</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/6/2005	
<u>LETTER FROM ORRICK, HERRINGTON & SUTCLIFF LLP RE COMMENTS ON WORKPLAN FOR SUPPLEMENTAL SITE INVESTIGATION DATED MARCH 7, 2005 PETITION FOR RECONSIDERATION</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/2/2005	
<u>ADDITIONAL SITE INVESTIGATION RESULTS</u>	SOIL AND WATER INVESTIGATION REPORT	BRIAN GREY (REGULATOR)	5/27/2005	
<u>REQUEST FOR COPIES RELATING TO BLACKROCK PETITION</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/28/2005	
<u>PETITION OF BLACKROCK REALTY ADVISORS INC., LAHONTAN WATER BOARD:ACKNOWLEDGEMENT OF PETITION RECEIVED AND APPROVAL OF REQUEST TO BE HELD IN ABEYANCE (SWRCB/OCC FILE A-1694)</u>	PETITION OF AGENCY ACTION OR INACTION	BRIAN GREY (REGULATOR)	4/13/2005	
<u>COMMENTS ON WORKPLAN FOR SUPPLEMENTAL SITE INVESTIGATION</u>	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	3/7/2005	
<u>COMMENTS ON SUPPLEMENTAL SITE INVESTIGATION</u>	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	11/22/2004	
<u>INTERNAL EMAIL STRING RE GW-6</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/16/2004	
<u>SUPPLEMENTAL SITE INVESTIGATION RESULTS</u>	SOIL AND WATER INVESTIGATION REPORT	BRIAN GREY (REGULATOR)	10/13/2004	
<u>PUBLIC RECORD REQUEST</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	8/6/2004	
<u>COMMENTS ON WORKPLAN FOR SUPPLEMENTAL SITE INVESTIGATION</u>	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	7/26/2004	
<u>PETITION FOR REVIEW FOR SITE INVESTIGATION - REMOVAL OF AIMCO AS A POTENTIAL RP (SWRCB/OCC FILE A-1644)</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	7/1/2004	
<u>WORKPLAN FOR SOIL SUPPLEMENTAL SITE INVESTIGATION</u>	SITE INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	7/1/2004	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>PETITION OF AIMCO (TECHNICAL REPORT ORDER FOR THE LAKE TAHOE LAUNDRY WORKS), LAHONTAN REGION: ACKNOWLEDGEMENT OF PETITION RECEIVED</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	6/22/2004	
<u>FACSIMILE FROM SCOTT REISCH TO HAROLD SINGER (LAHONTAN WATER BOARD EO) AND BETSY JENNINGS (SWRCB) WITH COPY OF JUNE 16, 2004 PETITION FOR REVIEW AND REQUEST FOR STAY</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	6/16/2004	
<u>REVISED REQUEST FOR WORKPLAN FOR SUPPLEMENTAL SITE INVESTIGATION</u>	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	5/17/2004	
<u>LETTER FROM STEEFEL, LEVITT, & WEISS RE: SOUTH Y CENTER LEASING HISTORY UPDATE</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	5/12/2004	
<u>RESPONSE TO REQUEST FOR WORKPLAN FOR SUPPLEMENTAL SITE INVESTIGATION</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/26/2004	
<u>REQUEST FOR WORKPLAN FOR SUPPLEMENTAL SITE INVESTIGATION</u>	STAFF LETTER	BRIAN GREY (REGULATOR)	4/12/2004	
<u>MEMORANDUM SOUTH Y CENTER OWNERSHIP HISTORY</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	3/11/2004	
<u>GROUNDWATER INVESTIGATION RESULTS</u>	SOIL AND WATER INVESTIGATION REPORT	BRIAN GREY (REGULATOR)	11/20/2003	
<u>REVIEW OF WORKPLAN BY PES ENVIRONMENTAL, INC. FOR LAKE TAHOE LAUNDRY WORKS</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/2/2003	
<u>APPROVAL OF WORKPLAN FOR GROUNDWATER INVESTIGATION</u>	STAFF LETTER	BRIAN GREY (REGULATOR)	8/21/2003	
<u>WORKPLAN FOR GROUNDWATER INVESTIGATION</u>	SOIL AND WATER INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	8/13/2003	
<u>NOTICE TO SUBMIT WORKPLAN FOR INVESTIGATION</u>	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	6/5/2003	

3. Petition Documents

NO PETITION DOCUMENT SUBMITTALS FOUND FOR THIS FACILITY.

4. Monitoring Reports

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
FIRST QUARTER 2022 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	6/15/2022	22,412 KB
FIRST QUARTER 2022 MONITORING REPORT - FIRST QUARTER 2022 MONITORING REPORT	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	6/15/2022	22,412 KB
FOURTH QUARTER 2021 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	3/15/2022	27,218 KB
THIRD QUARTER 2021 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	12/15/2021	19,181 KB
SECOND QUARTER 2021 GROUNDWATER MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	9/15/2021	29,817 KB
FIRST QUARTER 2021 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	6/15/2021	21,645 KB
FIRST QUARTER 2021 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	6/15/2021	21,607 KB
FOURTH QUARTER 2020 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	3/11/2021	17,430 KB
THIRD QUARTER 2020 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	12/15/2020	15,876 KB
THIRD QUARTER 2020 MONITORING REPORT - THIRD QUARTER 2020 MONITORING REPORT	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	12/15/2020	15,876 KB
THIRD QUARTER 2020 MONITORING REPORT - COVER EMAIL	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	12/15/2020	16,006 KB
INVESTIGATION SUMMARY REPORT	MONITORING REPORT - OTHER	EKI STAFF (AUTH_RP)	10/1/2020	50,539 KB
SECOND QUARTER 2020 MONITORING REPORT - 2ND QMR 2020	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	9/15/2020	25,269 KB
SECOND QUARTER 2020 MONITORING REPORT - COVER EMAIL	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	9/15/2020	25,383 KB
FIRST QUARTER 2020 MONITORING REPORT - 1ST QUARTER 2020 MONITORING REPORT	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	6/15/2020	20,497 KB
FIRST QUARTER 2020 MONITORING REPORT - COVER EMAIL	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	6/15/2020	20,614 KB
4TH QMR 2019 - 4TH QMR 2020	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	3/16/2020	17,521 KB
4TH QMR 2019 - COVER EMAIL	MONITORING REPORT - QUARTERLY	BRIAN GREY (REGULATOR)	3/16/2020	17,657 KB

FOURTH QUARTER 2019 REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	3/16/2020	17,521 KB
THIRD QUARTER 2019 GROUNDWATER MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	12/13/2019*	16,936 KB
SECOND QUARTER 2019 GROUNDWATER MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	9/13/2019	15,821 KB
FIRST QUARTER 2019 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	6/13/2019	20,956 KB
FOURTH QUARTER 2018 MONITORING REPORT	MONITORING REPORT - QUARTERLY	KYLE FLORY (AUTH_RP)	3/15/2019	33,643 KB
3Q 2018 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	12/14/2018	8,938 KB
2Q 2018 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	9/14/2018	15,332 KB
1Q 2018 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	6/14/2018	30,795 KB
4Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	3/15/2018	13,382 KB
3Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	12/15/2017	18,238 KB
OFF-SITE GROUNDWATER INVESTIGATION DATA REPORT	MONITORING REPORT - OTHER	PHIL GOALWIN (AUTH_RP)	8/30/2017	28,691 KB
2Q 2017 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	6/2/2017	48,558 KB
4Q 2016 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	2/23/2017	24,686 KB
3Q 2016 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	11/15/2016	22,848 KB
2Q 2016 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	9/6/2016	22,196 KB
1Q 2016 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	5/27/2016	13,639 KB
4Q 2015 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	2/18/2016	14,589 KB
INDOOR AIR SAMPLING REPORT	MONITORING REPORT - OTHER	PHIL GOALWIN (AUTH_RP)	1/14/2016	3,855 KB
3Q 2015 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	11/11/2015	11,842 KB
2Q 2015 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	9/17/2015	7,440 KB

1Q 2015 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	6/23/2015	5,254 KB
4Q 2014 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	3/27/2015	3,904 KB
3Q 2014 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	12/3/2014*	5,292 KB
2Q 2014 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	10/16/2014	8,854 KB
1Q 2014 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	7/30/2014	10,668 KB
4Q 2013 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	3/19/2014	10,633 KB
3Q 2013 GROUNDWATER MONITORING REPORT AND CURRENT SITE REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	1/7/2014	11,718 KB
2Q 2013 GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	9/25/2013	6,997 KB
1Q 2013 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	5/1/2013	19,464 KB
4Q 2012 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	3/11/2013	19,752 KB
3Q 2012 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	10/31/2012	11,370 KB
2Q 2012 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	8/13/2012	21,988 KB
1Q 2012 GROUND WATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	5/4/2012	5,371 KB
4Q 2011 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORTS	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	2/14/2012	9,172 KB
3Q 2011 GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	10/31/2011	3,932 KB
2Q 2011 GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	7/28/2011	13,002 KB
4Q 2010 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	7/7/2011*	8,877 KB
4Q 2010 GROUNDWATER MONITORING REPORT AND INTERIM REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	2/1/2011*	7,899 KB
3Q 2010 GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	11/1/2010*	11,389 KB
2Q 2010 GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	8/13/2010*	6,881 KB

PRE-REMEDIATION BASELINE (FIRST QUARTER 2010) GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	6/3/2010*	7,218 KB
4Q 2009 GROUNDWATER MONITORING REPORT AND REMEDIATION STATUS REPORT	MONITORING REPORT - QUARTERLY	PHIL GOALWIN (AUTH_RP)	3/1/2010*	4,626 KB

D. Community Involvement

1 . Environmental Justice

DWR 2016 DISADVANTAGED COMMUNITY DESIGNATION - INFO

Severely Disadvantaged Community

[CALENVIROSCREEN 3.0 SCORE - INFO](#)

[Percentile Range: 26-30%](#)

[CALENVIROSCREEN 4.0 SCORE - INFO](#)

[Percentile Range: 45-50%](#)

2. Community Involvement Documents

UPDATES AND INFORMATION

<u>DOCUMENT TITLE</u>	<u>DOCUMENT TYPE</u>	<u>DOCUMENT COMMENT</u>	<u>DOCUMENT DATE</u>	<u>DOCUMENT SIZE</u>
cover email and letter	Public Comment		7/25/2022	721KB
cover email and letter	Public Comment		6/24/2022	379KB
cover email	Public Comment		6/22/2022	282KB
Fox's Requests re proposed CAOs	Public Comment		6/22/2022	121KB
cover email	Public Comment		3/11/2022	5,545KB
SSLP Comments	Public Comment		3/11/2022	5,446KB
transmittal email	Public Comment		11/16/2021	2,934KB
Comments on AECOM Soil Gas Investigation Work Plan	Public Comment		11/16/2021	2,850KB
Former Big O Tires Site- PES Comments on Draft Agenda	Public Comment		9/19/2021	138KB
cover email	Public Comment		5/14/2021	3,495KB
cover email	Public Comment		5/14/2021	496KB
Response to Weiss Associates Comments Regarding South Y Basin Aquifer PCE	Public Comment		5/14/2021	383KB
Comments on RMC Geoscience, Inc. Soil Vapor Probe Investigation Report	Public Comment		5/14/2021	3,387KB
Notice of Public Meeting for Stakeholders and Interested Parties - Meeting on August 23, 2017 9AM to 12PM	Notification - Public Participation Document		7/28/2017	96KB
Proposed CAO	Letter - Notice		3/8/2017	57KB
Proposed CAO	Letter - Notice		3/6/2017	50KB

Proposed Cleanup and Abatement Order Status	Letter - Notice	3/3/2017	41KB
PCE Results from Off-site Monitoring Wells, Fall 2016	Letter - Notice	12/21/2016	1,899KB
Comments on Air Sparge Performance Test	Letter - Notice	5/24/2016	189KB
Completion of Tasks in Stipulated Agreement	Letter - Notice	2/17/2016	153KB
Extension of Comment Period for Proposed Cleanup and Abatement Order	Letter - Notice	1/14/2016	76KB
Schneeweis PCE well results	Letter - Notice	2/12/2015	1,764KB
Water Analysis for Stanford Sierra Camp Domestic Well	Letter - Notice	1/30/2015	182KB
Water Analysis for Stanford Sierra Camps Domestic Well	Letter - Notice	9/18/2014	193KB
Request for Public Comments for Cleanup	Notification - Public Notice of ROD/RAP/CAP	6/13/2013	1,240KB
Petition for Review of Site Investigation at the Lake Tahoe Laundry Works. Letter responded to petition for review of RP status. Letter agrees with petitioner that Black Rock Realty Advisors not considered an RP for cleanup at site.	Letter - Notice	6/5/2007	196KB

II. BIG O TIRES (SL0601729739)

[BIG O TIRES \(SL0601729739\) - \(MAP\)](#)

1961 LAKE TAHOE BOULEVARD
SOUTH LAKE TAHOE, CA 96150
EL DORADO COUNTY

CLEANUP OVERSIGHT AGENCIES
LAHONTAN RWQCB (REGION 6T) (LEAD) - CASE #: T6S034
CASEWORKER: BRIAN GREY

[CLEANUP PROGRAM SITE \(INFO\)](#)

A. Regulatory Activities

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	Enforcement/Orders	Deadline Extension	8/19/2022	8/19/2022	Comment Period Extended Comment period extended to September 19, 2022
[VIEW DOCS]	Response Requested - Other	response to Comments - Regulator Requested	8/17/2022	8/17/2022	Email from Tarantino re LTLW - Extension Request Renewal
[VIEW DOCS]	Enforcement/Orders	Deadline Extension	6/27/2022	6/27/2022	Comment Period Extended Comment Period Extended to August 23, 2022
	Response Requested - Other	Public Comment	6/24/2022	6/24/2022	email transmittal from Seven Springs re Request for Comments-Cleanup and Abatement Orders R6T-2022-(Proposed) for the LTLW, Former Big O Tires, and Former Noma's Cleaners Sites - request for (1) copies of the supporting documents referenced in the proposed Cleanup and Abatement Order (CAO) for Lake Tahoe Laundry Works and (2) an extension to the comment period for proposed CAOs for Lake Tahoe Laundry Works, Big O Tires, and Former Norma's Cleaners
[VIEW DOCS]	Response Requested - Other	Public Comment	6/22/2022	6/22/2022	email re Fox's Requests re Proposed CAOs- request for (1) copies of the supporting documents referenced in the proposed Cleanup and Abatement Order (CAO) for Lake Tahoe Laundry Works and (2) an extension to the comment period for proposed CAOs for Lake Tahoe Laundry Works, Big O Tires, and Former Norma's Cleaners
[VIEW DOCS]	Enforcement/Orders	Clean-up and Abatement Order	6/16/2022	6/16/2022	Request For Comments- R6T-2022-(PROPOSED) for Big O Tires
[VIEW DOCS]	Response Requested - Other	Public Comment	9/19/2021	9/19/2021	Email from Kyle Flory of PES Environmental, Inc. re: PES Comments on Draft Agenda
[VIEW DOCS]	Other Regulatory Actions	Meeting	9/8/2021	9/8/2021	Teleconference to discuss work plan requirements and scope of work. Attendees included Kara Thiel, Josh Fortmann, David Herzog, Jeff Brooks, Jim Carolan, Brian Grey, Tamarin Austin, and Naomi Rubin.
[VIEW DOCS]	Response Requested - Other	Public Comment	8/27/2021	8/27/2021	Email from Kyle Flory of PES Environmental transmitting Former Big O Tire Site - Comments on Revised Phase 2 Work Plan dated July 26, 2021

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Enforcement/Orders</i>	Notice of Violation	8/13/2021	8/13/2021	Notice of Violation
	<i>Other Regulatory Actions</i>	Verbal Communication	8/9/2021	8/9/2021	Telephone conversation with Joshua Fortmann of BAI. Discussed submitted work plan, forthcoming NOV, and potential revisions to address NOV comments.
	<i>Other Regulatory Actions</i>	Verbal Communication	7/2/2021	7/2/2021	Telephone conversation with Joshua Fortmann of BAI. Discussed site visit findings and revised work plan tasks.
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/8/2021	6/8/2021	Teleconference to discuss Revised Phase II Work Plan. Attendees David Herzog (WHA), Joshua Fortman (BAI), and Brian Grey (Lahontan)
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	6/8/2021	6/8/2021	email from Kyle Flory of PES Environmental re BOT-WHA Revised Phase II Work Plan
	<i>Other Regulatory Actions</i>	Meeting	6/2/2021	6/2/2021	Administrative Civil Liability Complaint meeting with CAD Enterprises representatives (Kara Thiel and David Herzog)
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/29/2021	4/29/2021	Administrative Civil Liability Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	4/28/2021	4/28/2021	Email from Thiel confirming receipt of Third NOV
[VIEW DOCS]	<i>Enforcement/Orders</i>	Notice of Violation	4/15/2021	4/15/2021	Third Notice of Violation
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	4/6/2021	2/6/2021	PES Environmental Inc. Comments on Phase II Work Plan
	<i>Other Regulatory Actions</i>	Verbal Communication	2/12/2021	2/12/2021	Telephone conversation with David Herzog re Phase II Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	1/6/2021	1/7/2021	email from Thiel transmitting Phase 2 Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	12/15/2020	12/15/2020	Comments on Passive Soil Gas Investigation Report provided by PES Environmental, Inc.
	<i>Other Regulatory Actions</i>	Meeting	12/10/2020	12/10/2020	Teleconference with Kara Thiel and David Herzog to discuss PSG Report and next steps. Work Plan for additional actions anticipated by Dec. 21.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/17/2020	11/17/2020	Email to Thiel re Passive Soil Gas Investigation Report and potential teleconference times
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Assessment Report	11/12/2020	11/11/2020	Passive Soil Gas Investigation Report

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[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence - Regulator Responded	11/4/2020	11/4/2020	Email from Herzog regarding LTCP media specific criteria evaluation. Indicated benzene concentrations in B-8 and B-13 were reported in micrograms per kilogram and not milligrams per kilogram as indicated in the May 10, 2019 13267 letter. Consequently, LTCP direct contact criteria are met.
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	9/28/2020	9/28/2020	Amendment to May 10, 2019 Order to Submit Technical Report in Accordance with Section 13267 of the California Water Code, Former Big O Tire Store, 1961 Lake Tahoe Boulevard
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan	9/18/2020	9/18/2020	Final Revised Phase I Passive Soil Gas Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Response to Comments	9/18/2020	9/18/2020	Welsh Hagen Associates Response to Comments to Revised Phase I Passive Soil Gas Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	9/16/2020	9/16/2020	PES Environmental Inc. Comments on Revised Passive Soil Gas Investigation Work Plan dated September 4, 2020
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan	9/4/2020	9/4/2020	Revised Phase 1 Soil Gas Investigation Work Plan
	<i>Other Regulatory Actions</i>	Meeting	9/3/2020	9/3/2020	Teleconference with David Herzog to discuss Phase I Passive Soil Gas Investigation Work Plan. Discussed potential concerns related to proposed sampling locations (i.e. targeted vs. non-biased grid sampling)
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan - Regulator Responded	9/1/2020	9/1/2020	Phase I Passive Soil Gas Investigation Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/25/2020	8/25/2020	email string re status update
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/29/2020	7/29/2020	Email string with Thiel regarding status of utility/camera survey and revised work plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/23/2020	7/23/2020	Email transmitting Response to Comments to Section A Subsurface Utility Locating/Screening
	<i>Other Regulatory Actions</i>	Meeting	7/2/2020	7/2/2020	Teleconference to discuss Soil Gas, Soil and Groundwater Investigation Work Plan, comments received and path forward. Attendees included Kara Thiel, David Herzog, Jeff Brooks, Abby Cazier and Brian Grey. Sewer and storm drain survey scheduled for July 13th. Will proceed with survey and provide revised site plan and work plan afterward.
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	6/19/2020	6/19/2020	Comments on Soil Gas, Soil, and Groundwater Investigation Work Plan and Camco/BOT 65, Inc. Submittals - PES Environmental, Inc.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Site Investigation Workplan	5/22/2020	5/22/2020	Soil Gas, Soil and Groundwater Investigation Work Pan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	5/15/2020	5/15/2020	Email string re Autocad drawings/request for meeting
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	4/28/2020	4/28/2020	email from Thiel re Novasel questionnaire and status update
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	4/23/2020	4/23/2020	Email string with Thiel regarding consultant proposal
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	4/16/2020	4/16/2020	Email from Thiel transmitting Welsh Hagen proposal
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	4/10/2020	4/10/2020	Email from Kara Thiel providing status update
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	3/24/2020	3/24/2020	Email from Mark Strong transmitting Big O Operations Manual
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	2/27/2020	2/27/2020	Gail Strong dropped off additional information including chemical use questionnaire, hazardous material plan, MSDS sheets for Safety Kleen and Brakleen, and receipts and cancelled checks from Safety Kleen Corp. and Evergreen Environmental Services
	<i>Other Regulatory Actions</i>	Verbal Communication	2/25/2020	2/25/2020	Spoke with Kara Thiel. Indicated that she will provide letter next week indicating intended path forward and schedule.
	<i>Other Regulatory Actions</i>	Verbal Communication	2/4/2020	2/4/2020	Left series of phone messages beginning week of Jan 20 for Kara Thiel regarding Second NOV response. No response as of Feb. 7.
[VIEW DOCS]	<i>Enforcement/Orders</i>	Notice of Violation	1/8/2020	1/8/2020	Second Notice of Violation
	<i>Other Regulatory Actions</i>	Verbal Communication	12/20/2019	12/20/2019	Telephone conversation with Mrs. Strong. Discussed forthcoming NOV, responsible party naming, and current status of regional investigation.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Petition of Agency Action or Inaction	12/12/2019	12/12/2019	Petition of CAD Enterprises, Inc and David & Kathleen Barnett for Review of 13267 Order to Submit Technical Reports regarding Big O Tire Store.....Approval of Request to Place Existing Active Petition in Abeyance
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	11/19/2019	11/19/2019	Email string with Strongs regarding tentative meeting scheduled for December 4 and transmittal of incomplete petition response from State Board

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
	<i>Enforcement/Orders</i>	Verbal Enforcement	11/14/2019	11/14/2019	Spoke with Mark and Gail Strong. I indicated that they are still considered responsible parties based on available information. They noted that our most recent directive contained an error with the operational timeframe (ie operation ended in September 1994 and did not extend thereafter) and indicated that they would like to meet with upper management to discuss the naming of them as RPs.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/14/2019	11/14/2019	Email from Strongs including correspondence chronology and notes from old timers
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Petition of Agency Action or Inaction	11/10/2019	11/10/2019	Notice of Incomplete Petition
	<i>Other Regulatory Actions</i>	Verbal Communication	10/29/2019	10/29/2019	Spoke with Kara Thiel of Feldman Thiel LLP regarding proposed closure of Lakeside Napa and requests for information. Indicated Water Board will likely be issuing second notice of violation shortly.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	10/28/2019	10/28/2019	Email from Kara Thiel of Feldman Thiel LLP re status of outstanding requests for information ie questionnaire and investigation work plan
	<i>Other Regulatory Actions</i>	Verbal Communication	10/24/2019	10/24/2019	Left phone message for Kara Thiel regarding status of information request/work plan. No contact made since initial conversation on 9/11.
	<i>Other Regulatory Actions</i>	Verbal Communication	10/10/2019	10/10/2019	Left phone message for Kara Thiel regarding status of information request/work plan. No contact made since initial conversation on 9/11
	<i>Other Regulatory Actions</i>	Verbal Communication	10/1/2019	10/1/2019	Left phone messages for Kara Thiel on 9/26 and 10/1 regarding status of information requests
	<i>Other Regulatory Actions</i>	Verbal Communication	9/11/2019	9/11/2019	Spoke with Kara Thiel of Feldman Thiel LLP regarding submittal of work plan. Discussed option of allowing Lake Tahoe Laundry Works to access property to perform work. She plans to discuss with clients and followup with potential path forward next week.
[VIEW DOCS]	<i>Enforcement/Orders</i>	Notice of Violation	8/27/2019	8/27/2019	Notice of Violation-Late Technical Reports Required by May 10, 2019 Investigative Order
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/23/2019	8/23/2019	Comment Letter from Seven Springs and Fox related to May 2019 13267 Order and Barnett/CAD Enterprises petition
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan	7/10/2019	9/18/2020	Final Revised Phase I Passive Soil Gas Investigation Work Plan

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	7/10/2019	5/22/2020	May 8, 2020 Soil Gas, Soil, and Groundwater Investigation Work Plan
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	7/10/2019	7/26/2021	Revised Phase 2 Work Plan
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	7/10/2019	5/24/2021	Response to Notice of Violation and Revised Phase II Work Plan
	<i>Other Regulatory Actions</i>	Verbal Communication	7/2/2019	7/2/2019	Left message for Mark and Gayle Strong. Provided Beryt contact info.
	<i>Other Regulatory Actions</i>	Meeting	7/1/2019	7/1/2019	Mark and Gail Strong stopped by to discuss directive and their June 4, 2019 response letter. Indicated that I would be meeting with legal counsel tomorrow and will followup afterward.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Petition of Agency Action or Inaction	6/24/2019	6/24/2019	Receipt of Petition and Request for Stay Petition of CAD Enterprises, Inc. and David and Kathleen Barnett
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Petition of Agency Action or Inaction	6/7/2019	6/7/2019	Petition
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	6/4/2019	6/7/2019	Letter to State Water Resources Control Board re:Lahontan Water Board Order Dated May 10, 2019
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	5/10/2019	5/10/2019	Order to Submit Technical Reports
[VIEW DOCS]	<i>Response Requested - Other</i>	Conceptual Site Model	12/7/2015	12/7/2015	Commerce Plates 1 & 2
[VIEW DOCS]	<i>Response Requested - Other</i>	Conceptual Site Model	12/7/2015	12/7/2015	Commerce Bank comments to No Further Action for Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Conceptual Site Model	12/3/2015	12/4/2015	Response Letter for No Further Action for Big O Tires
[VIEW DOCS]	<i>Notices</i>	Notification - Public Notice of Case Closure	10/7/2015	10/7/2015	Consideration of No Further Action--60 Day Notice for Comments
	<i>Other Regulatory Actions</i>	File Review - Closure	2/26/2015	2/26/2015	Property is no longer considered a PCE source PCE in groundwater beneath this site is from the Lake Tahoe Laundry Works; property is not a source of PCE in groundwater.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/30/2008	10/30/2008	Waterboard Letter Abeyance Petition
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/1/2007	11/1/2007	Waterboard Letter Abeyance Petition
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/26/2007	7/26/2007	Waterboard Letter Received PES Comments Workplan Investigation

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	<i>Other Regulatory Actions</i>	Staff Letter	7/24/2007	7/24/2007	Denial of No Further Action request. Site is considered a probable PCE source and a definite petroleum source site. A further request for an investigation workplan will be forthcoming.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/24/2007	7/24/2007	Waterboard Letter Denial NFA Request
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/10/2007	7/10/2007	PES Comments Soil & Groundwater Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	5/24/2007	5/24/2007	Lawyer Letter Request NFA
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	5/23/2007	5/23/2007	LFR Response Waterboard Comments Site Investigation Results
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/22/2007	2/22/2007	Comment letter to RPs stating that the site contains probably releases of PCE. Cannot issue "No Further Action" letter. Will notify in future if more site assessment is necessary.
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/29/2007	1/29/2007	Lawyer Letter Petition CAO Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/3/2006	11/3/2006	Waterboard Letter Abeyance Petition Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Response to Comments	10/31/2006	10/31/2006	Response to the Lahontan Regional Water Quality Control Board (LRWQCB) Order for Additional Investigation Information
	<i>Response Requested - Other</i>	Other Report / Document	10/31/2006	10/31/2006	LFR Response WB Comments Soil & Groundwater Investigation Big O Tires
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	10/4/2006	10/4/2006	Order for Additional Investigation Information
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/22/2006	8/22/2006	Waterboard Letter Sending PES Big O Tire Investigation Report
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	8/10/2006	8/9/2006	Results of Soil and Groundwater Investigations at the Big O Tire Store Site
	<i>Other Regulatory Actions</i>	Meeting	8/3/2006	8/3/2006	Meeting with local environmental health department and water purveyor re site status.
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	6/2/2006	6/2/2006	Waterboard Letter Conditional Approval Revised Workplan Big O Tires

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[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	5/26/2006	8/9/2006	Soil and Water Investigation Report
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	5/2/2006	5/2/2006	Lawyer Letter Disposal Receipt Soil Big O Tires
	<i>Response Requested - Workplans</i>	Other Workplan	4/28/2006	4/27/2006	
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	4/20/2006	4/20/2006	Requires submittal of a revised site investigation workplan.
	<i>Response Requested - Other</i>	Other Report / Document	4/15/2006	5/4/2006	
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	3/28/2006	3/28/2006	EDR Big O Tires
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	3/15/2006	3/20/2006	Soil and Water Investigation Workplan
[VIEW DOCS]	<i>Enforcement/Orders</i>	Amendment to Order - #R6T-2003-031A1	3/8/2006	3/8/2006	Amended CAO. Requires responsible parties to investigation potential solvent discharges on the site.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/11/2006	1/11/2006	Waterboard Letter Received Draft CAO Comments
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/16/2005	12/16/2005	Lawyer Comment Draft Amended CAO Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/12/2005	12/12/2005	Waterboard Letter Comments Draft Amended CAO Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/6/2005	12/6/2005	LTLW Lawyer Response Comments CAO Big O Tires
	<i>Enforcement - Other</i>	* No Action	10/19/2005	10/19/2005	
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/19/2005	10/19/2005	Lawyer Letter Correction to 2005 10 19 Correspondence
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/19/2005	10/19/2005	Lawyer Comments Amended CAO R6T-2033-031A1 Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/19/2005	10/19/2005	Waterboard Letter Received Morrison CAO Comments
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/19/2005	10/19/2005	Waterboard Letter Abeyance Petition Big O Tires

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/19/2005	10/19/2005	Waterboard Letter Receipt CAO Comments 2111 Dunlap
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/4/2005	10/4/2005	Lawyer Letter LTLW Comments Draft Amended CAO Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/29/2005	9/29/2005	Waterboard Letter Extension CAO Response
	<i>Response Requested - Workplans</i>	Public Participation Plan	9/20/2005		Public Participation Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/20/2005	9/20/2005	Lawyer Letter 2111 Dunlap Response CAO Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/31/2005	8/31/2005	Lawyer Letter Request Extension CAO Response Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/24/2005	8/24/2005	Waterboard Draft Amended CAO Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/22/2005	8/22/2005	Waterboard Staff Report Solvent Contamination at Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	4/6/2005	4/6/2005	ELCEMD Inspection Report Notice of Correction Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/6/2004	12/6/2004	Waterboard Letter Comment Investigation WP Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/19/2004	10/19/2004	PES Comments WP Additional Investigation Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/1/2004	3/1/2004	Waterboard Letter Remove Mark Strong CAMCO BOT65 PRP List Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/29/2004	1/29/2004	Lawyer Letter CAO PRP List Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/29/2004	1/29/2004	Mark Strong Letter Solvent Use Part Cleaner Used MSDS Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/16/2004	1/16/2004	Insurance Coverage Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/15/2004	1/15/2004	Sierra Pacific Group Review of Hydrogeologic Data Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/22/2003	12/22/2003	Waterboard Letter Revised Workplan Extension Approval Big O Tires

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[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/12/2003	12/12/2003	Sierra Pacific Group Request Extension Revised Workplan Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/25/2003	11/25/2003	Waterboard Letter Submit Revised Workplan for Site Investigation Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/30/2003	10/30/2003	Waterboard Letter Petition Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/20/2003	10/20/2003	Waterboard Letter Deadline Extensions for CAO Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/3/2003	10/3/2003	Waterboard Dismissal Of Petition Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/26/2003	9/26/2003	Lawyer Letter Matter of Petition CAO Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/25/2003	9/25/2003	Sierra Pacific Group Cover Letter WP Soil & Groundwater Investigation Big O Tires
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	9/24/2003	9/24/2003	PRELIMINARY WORK PLAN FOR ADDITIONAL INVESTIGATION OF CHLORINATED SOLVENTS IN SOIL AND GROUND WATER BIG O TIRE SITE
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/12/2003	9/12/2003	Sierra Pacific Group Cover Letter Work Plan Soil & Groundwater Investigation Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/5/2003	9/5/2003	Waterboard Letter Receipt Petetion Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/3/2003	9/3/2003	Lawyer Letter Petition for Reconsideration CAO Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/3/2003	9/3/2003	Petition Reconsideration CAO RB6S-2003-031
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/3/2003	9/3/2003	Declaration David Barnett Support Petitation for Review CAO RB6S-2003-031
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/21/2003	8/21/2003	Lawyer Intent to Petition CAO Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/8/2003	8/8/2003	Dunlap Drive Seeking to Recover Costs Well Contamination

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Enforcement/Orders</i>	Clean-up and Abatement Order - #RB6S-2003-031	8/4/2003	8/4/2003	
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/4/2003	8/4/2003	Facility Enforcement Report Big O Tire
	<i>Leak Action</i>	Leak Reported	8/4/2003		
	<i>Leak Action</i>	Leak Discovery	8/4/2003		
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/4/2003	8/4/2003	PCE Unauthorized Release Form
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	6/3/2003	6/3/2003	Lawyer Letter Dry Cleaner Across Street Big O Tires
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/18/2003	4/18/2003	Potential Responsible Party Meeting Notification
	<i>Leak Action</i>	Leak Began	1/1/2003		
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/22/2002	2/22/2002	Waterboard Letter Postponment Additional Groundwater Investigations Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/17/2002	1/17/2002	Lawyer Notice of Intent to Commence Legal Action Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/3/2002	1/3/2002	Lawyer Notice of Intent to Commence Legal Action Big O Tires
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	1/2/2002	1/2/2002	Waterboard Letter Request for Workplan for Additional Investigation Big O Tires
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/29/2001	11/29/2001	STPUD Letter Comments on BigO Investigation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/19/2001	11/19/2001	Waterboard Facility Violation Report
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	10/30/2001	10/30/2001	GROUNDWATER INVESTIGATION BIG-O TIRE CENTER
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	9/25/2001	9/25/2001	APPROVAL OF WORKPLAN FOR GROUNDWATER INVESTIGATION AT 1961 LAKE TAHOE BOULEVARD

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE /DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation	9/20/2001	9/20/2001	Proposed Work Plan for Groundwater Investigation at 1961 Lake Tahoe Boulevard
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Workplan - Soil and Water Investigation	9/18/2001	9/18/2001	Proposed Work Plan for Groundwater Investigation at 1961 Lake Tahoe Boulevard
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	9/5/2001	9/5/2001	Lawyer Correspondence Regarding PRP
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	8/29/2001	8/29/2001	Lawyer Correspondence Regarding PRP
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	8/24/2001	8/24/2001	Lawyer Correspondence Regarding PRP
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	8/23/2001	8/23/2001	Letter from Wendel Rossen Black & Dean Attorneys at Law
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	7/20/2001	7/20/2001	NOTICE TO SUBMIT WORKPLAN FOR INVESTIGATION AT 1961 LAKE TAHOE BOULEVARD, SOUTH LAKE TAHOE, EL DORADO COUNTY (APN 023-523-08)

B. Environmental Data

1. Individual Well Analytical Data

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
AIR BLANK 1	QCAB					
AIR BLANK 2	QCAB					
AIR BLANK 3	QCAB					
QCTB	QCTB					
MK166	Soil Gas					PSG
MK167	Soil Gas					PSG
MK168	Soil Gas					PSG
MK169	Soil Gas					PSG
MK169-DUP	Soil Gas					PSG
MK170	Soil Gas					PSG
MK171	Soil Gas					PSG
MK172	Soil Gas					PSG
MK173	Soil Gas					PSG
MK174	Soil Gas					PSG
MK175	Soil Gas					PSG
MK176	Soil Gas					PSG
MK177	Soil Gas					PSG
MK179	Soil Gas					PSG
MK180	Soil Gas					PSG
MK182	Soil Gas					PSG
MK183	Soil Gas					PSG
MK184	Soil Gas					PSG
MK185	Soil Gas					PSG
MK186	Soil Gas					PSG
MK187	Soil Gas					PSG
MK188	Soil Gas					PSG
MK189	Soil Gas					PSG
MK190	Soil Gas					PSG
MK190-DUP	Soil Gas					PSG
MK191	Soil Gas					PSG
MK192	Soil Gas					PSG
MK193	Soil Gas					PSG
MK194	Soil Gas					PSG
MK195	Soil Gas					PSG
MK196	Soil Gas					PSG
MK197	Soil Gas					PSG
MK198	Soil Gas					PSG
MK199	Soil Gas					PSG
MK200	Soil Gas					PSG
MK201	Soil Gas					PSG
MK202	Soil Gas					PSG
MK203	Soil Gas					PSG
MK204	Soil Gas					PSG
MK205	Soil Gas					PSG
MK206	Soil Gas					PSG
MK207	Soil Gas					PSG
MK209	Soil Gas					PSG
MK209-DUP	Soil Gas					PSG
MK210	Soil Gas					PSG
MK211	Soil Gas					PSG
MK212	Soil Gas					PSG

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
MK213	Soil Gas					PSG

2. Laboratory Analytical Reports (EDF)

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>	
PASSIVE SOIL GAS INVESTIGATION REPORT	Q4 2020	JOSHUA FORTMANN	7/2/2021*	VIEW NARRATIVE DATA

3. Well Latitude / Longitude Data (GEO_XY)

NO GEO_XY SUBMITTALS FOR THIS FACILITY.

4. Well Survey Data (GEO_Z)

NO GEO_Z SUBMITTALS FOR THIS FACILITY.

5. Well Depth to Water Data (GEO_WELL)

NO GEO_WELL SUBMITTALS FOR THIS FACILITY.

C. Site Maps / Documents

1. Site Maps (GEO_MAP), Boring Logs (GEO_BORE) and KML / KMZ Files

NO SITE MAP SUBMITTALS FOUND FOR THIS FACILITY.

2. Site Documents

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
COMMENT PERIOD EXTENDED	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	8/19/2022	
EMAIL FROM TARANTINO RE LTLW - EXTENSION REQUEST RENEWAL	RESPONSE TO COMMENTS	BRIAN GREY (REGULATOR)	8/17/2022	
COMMENT PERIOD EXTENDED	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	6/27/2022	
EMAIL RE FOX'S REQUESTS RE PROPOSED CAOS- REQUEST FOR (1) COPIES OF THE SUPPORTING DOCUMENTS REFERENCED IN THE PROPOSED CLEANUP AND ABATEMENT ORDER (CAO) FOR LAKE TAHOE LAUNDRY WORKS AND (2) AN EXTENSION TO THE COMMENT PERIOD FOR PROPOSED CAOS FOR LAKE TAHOE LAUNDRY WORKS, BIG O TIRES, AND FORMER NORMA CLEANERS	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	6/22/2022	
REQUEST FOR COMMENTS- R6T-2022-(PROPOSED) FOR BIG O TIRES	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	6/16/2022	
EMAIL FROM KYLE FLORY OF PES ENVIRONMENTAL, INC. RE: PES COMMENTS ON DRAFT AGENDA	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	9/19/2021	
TELECONFERENCE TO DISCUSS WORK PLAN REQUIREMENTS AND SCOPE OF WORK. ATTENDEES INCLUDED KARA THIEL, JOSH FORTMANN, DAVID HERZOG, JEFF BROOKS, JIM CAROLAN, BRIAN GREY, TAMARIN AUSTIN, AND NAOMI RUBIN.	MEETING	BRIAN GREY (REGULATOR)	9/8/2021	
EMAIL FROM KYLE FLORY OF PES ENVIRONMENTAL TRANSMITTING FORMER BIG O TIRE SITE - COMMENTS ON REVISED PHASE 2 WORK PLAN DATED JULY 26, 2021	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	8/27/2021	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>NOTICE OF VIOLATION</u>	NOTICE OF VIOLATION	BRIAN GREY (REGULATOR)	8/13/2021	
<u>REVISED PHASE 2 WORK PLAN</u>	SOIL AND WATER INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	7/26/2021	
<u>EMAIL FROM KYLE FLORY OF PES ENVIRONMENTAL RE BOT-WHA REVISED PHASE II WORK PLAN</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	6/8/2021	
<u>RESPONSE TO NOTICE OF VIOLATION AND REVISED PHASE II WORK PLAN</u>	SOIL AND WATER INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	5/24/2021	
<u>ADMINISTRATIVE CIVIL LIABILITY INVESTIGATION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	4/29/2021	
<u>EMAIL FROM THIEL CONFIRMING RECEIPT OF THIRD NOV</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/28/2021	
<u>THIRD NOTICE OF VIOLATION</u>	NOTICE OF VIOLATION	JEFF BROOKS (REGULATOR)	4/15/2021	
<u>PES ENVIRONMENTAL INC. COMMENTS ON PHASE II WORK PLAN</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	2/6/2021	
<u>EMAIL FROM THIEL TRANSMITTING PHASE 2 WORK PLAN</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/7/2021	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>COMMENTS ON PASSIVE SOIL GAS INVESTIGATION REPORT PROVIDED BY PES ENVIRONMENTAL, INC.</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	12/15/2020	
<u>EMAIL TO THIEL RE PASSIVE SOIL GAS INVESTIGATION REPORT AND POTENTIAL TELECONFERENCE TIMES</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/17/2020	
<u>PASSIVE SOIL GAS INVESTIGATION REPORT</u>	SITE ASSESSMENT REPORT	BRIAN GREY (REGULATOR)	11/11/2020	
<u>EMAIL FROM HERZOG REGARDING LTCP MEDIA SPECIFIC CRITERIA EVALUATION. INDICATED BENZENE CONCENTRATIONS IN B-8 AND B-13 WERE REPORTED IN MICROGRAMS PER KILOGRAM AND NOT MILLIGRAMS PER KILOGRAM AS INDICATED IN THE MAY 10, 2019 13267 LETTER. CONSEQUENTLY, LTCP DIRECT CONTACT CRITERIA ARE MET.</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/4/2020	
<u>AMENDMENT TO MAY 10, 2019 ORDER TO SUBMIT TECHNICAL REPORT IN ACCORDANCE WITH SECTION 13267 OF THE CALIFORNIA WATER CODE, FORMER BIG O TIRE STORE, 1961 LAKE TAHOE BOULEVARD</u>	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	9/28/2020	
<u>WELSH HAGEN ASSOCIATES RESPONSE TO COMMENTS TO REVISED PHASE I PASSIVE SOIL GAS INVESTIGATION WORK PLAN</u>	RESPONSE TO COMMENTS	BRIAN GREY (REGULATOR)	9/18/2020	
<u>FINAL REVISED PHASE I PASSIVE SOIL GAS INVESTIGATION WORK PLAN</u>	OTHER WORKPLAN	BRIAN GREY (REGULATOR)	9/18/2020	
<u>FINAL REVISED PHASE I PASSIVE SOIL GAS INVESTIGATION WORK PLAN</u>	OTHER WORKPLAN	BRIAN GREY (REGULATOR)	9/18/2020	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>PES ENVIRONMENTAL INC. COMMENTS ON REVISED PASSIVE SOIL GAS INVESTIGATION WORK PLAN DATED SEPTEMBER 4, 2020</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	9/16/2020	
<u>REVISED PHASE 1 SOIL GAS INVESTIGATION WORK PLAN</u>	OTHER WORKPLAN	BRIAN GREY (REGULATOR)	9/4/2020	
<u>PHASE I PASSIVE SOIL GAS INVESTIGATION WORK PLAN</u>	OTHER WORKPLAN	BRIAN GREY (REGULATOR)	9/1/2020	
<u>EMAIL STRING RE STATUS UPDATE</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/25/2020	
<u>EMAIL STRING WITH THIEL REGARDING STATUS OF UTILITY/CAMERA SURVEY AND REVISED WORK PLAN</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/29/2020	
<u>EMAIL TRANSMITTING RESPONSE TO COMMENTS TO SECTION A SUBSURFACE UTILITY LOCATING/SCREENING</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/23/2020	
<u>COMMENTS ON SOIL GAS, SOIL, AND GROUNDWATER INVESTIGATION WORK PLAN AND CAMCO/BOT 65, INC. SUBMITTALS - PES ENVIRONMENTAL, INC.</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	6/19/2020	
<u>SOIL GAS, SOIL AND GROUNDWATER INVESTIGATION WORK PLAN</u>	SITE INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	5/22/2020	
<u>MAY 8, 2020 SOIL GAS, SOIL, AND GROUNDWATER INVESTIGATION WORK PLAN</u>	SOIL AND WATER INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	5/22/2020	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>EMAIL STRING RE AUTOCAD DRAWINGS/REQUEST FOR MEETING</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	5/15/2020	
<u>EMAIL FROM THIEL RE NOVASEL QUESTIONNAIRE AND STATUS UPDATE</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/28/2020	
<u>EMAIL STRING WITH THIEL REGARDING CONSULTANT PROPOSAL</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/23/2020	
<u>EMAIL FROM THIEL TRANSMITTING WELSH HAGEN PROPOSAL</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/16/2020	
<u>EMAIL FROM KARA THIEL PROVIDING STATUS UPDATE</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/10/2020	
<u>EMAIL FROM MARK STRONG TRANSMITTING BIG O OPERATIONS MANUAL</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/24/2020	
<u>GAIL STRONG DROPPED OFF ADDITIONAL INFORMATION INCLUDING CHEMICAL USE QUESTIONNAIRE, HAZARDOUS MATERIAL PLAN, MSDS SHEETS FOR SAFETY KLEEN AND BRAKLEEN, AND RECEIPTS AND CANCELLED CHECKS FROM SAFETY KLEEN CORP. AND EVERGREEN ENVIRONMENTAL SERVICES</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	2/27/2020	
<u>SECOND NOTICE OF VIOLATION</u>	NOTICE OF VIOLATION	BRIAN GREY (REGULATOR)	1/8/2020	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>PETITION OF CAD ENTERPRISES, INC AND DAVID & KATHLEEN BARNETT FOR REVIEW OF 13267 ORDER TO SUBMIT TECHNICAL REPORTS REGARDING BIG O TIRE STORE.....APPROVAL OF REQUEST TO PLACE EXISTING ACTIVE PETITION IN ABEYANCE</u>	PETITION OF AGENCY ACTION OR INACTION	BRIAN GREY (REGULATOR)	12/12/2019	
<u>EMAIL STRING WITH STRONGS REGARDING TENTIVE MEETING SCHEDULED FOR DECEMBER 4 AND TRANSMITTAL OF INCOMPLETE PETITION RESPONSE FROM STATE BOARD</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/19/2019	
<u>EMAIL FROM STRONGS INCLUDING CORRESPONDENCE CHRONOLOGY AND NOTES FROM OLD TIMERS</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/14/2019	
<u>NOTICE OF INCOMPLETE PETITION</u>	PETITION OF AGENCY ACTION OR INACTION	BRIAN GREY (REGULATOR)	11/10/2019	
<u>EMAIL FROM KARA THIEL OF FELDMAN THIEL LLP RE STATUS OF OUTSTANDING REQUESTS FOR INFORMATION IE QUESTIONNAIRE AND INVESTIGATION WORK PLAN</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/28/2019	
<u>NOTICE OF VIOLATION-LATE TECHNICAL REPORTS REQUIRED BY MAY 10, 2019 INVESTIGATIVE ORDER</u>	NOTICE OF VIOLATION	JEFF BROOKS (REGULATOR)	8/27/2019	
<u>COMMENT LETTER FROM SEVEN SPRINGS AND FOX RELATED TO MAY 2019 13267 ORDER AND BARNETT/CAD ENTERPRISES PETITION</u>	OTHER REPORT / DOCUMENT	JEFF BROOKS (REGULATOR)	8/23/2019	
<u>RECEIPT OF PETITION AND REQUEST FOR STAY PETITION OF CAD ENTERPRISES, INC. AND DAVID AND KATHLEEN BARNETT</u>	PETITION OF AGENCY ACTION OR INACTION	BRIAN GREY (REGULATOR)	6/24/2019	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>PETITION</u>	PETITION OF AGENCY ACTION OR INACTION	JEFF BROOKS (REGULATOR)	6/7/2019	
<u>LETTER TO STATE WATER RESOURCES CONTROL BOARD RE:LAHONTAN WATER BOARD ORDER DATED MAY 10, 2019</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/7/2019	
<u>ORDER TO SUBMIT TECHNICAL REPORTS</u>	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	5/10/2019	
<u>COMMERCE BANK COMMENTS TO NO FURTHER ACTION FOR BIG O TIRES - REGULATOR RESPONSE</u>	CONCEPTUAL SITE MODEL	LISA DERNBACH (REGULATOR)	12/7/2015	
<u>COMMERCE PLATES 1 & 2 - REGULATOR RESPONSE</u>	CONCEPTUAL SITE MODEL	LISA DERNBACH (REGULATOR)	12/7/2015	
<u>RESPONSE LETTER FOR NO FURTHER ACTION FOR BIG O TIRES - REGULATOR RESPONSE</u>	CONCEPTUAL SITE MODEL	LISA DERNBACH (REGULATOR)	12/4/2015	
<u>CONSIDERATION OF NO FURTHER ACTION--60 DAY NOTICE FOR COMMENTS</u>	NOTIFICATION - PUBLIC NOTICE OF CASE CLOSURE	LISA DERNBACH (REGULATOR)	10/7/2015	
<u>WATERBOARD LETTER ABEYANCE PETITION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/30/2008	
<u>WATERBOARD LETTER ABEYANCE PETITION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/1/2007	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WATERBOARD LETTER RECEIVED PES COMMENTS WORKPLAN INVESTIGATION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/26/2007	
<u>WATERBOARD LETTER DENIAL NFA REQUEST</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/24/2007	
<u>PES COMMENTS SOIL & GROUNDWATER INVESTIGATION</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	7/10/2007	
<u>LAWYER LETTER REQUEST NFA</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	5/24/2007	
<u>LFM RESPONSE WATERBOARD COMMENTS SITE INVESTIGATION RESULTS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	5/23/2007	
<u>COMMENT LETTER TO RPS STATING THAT THE SITE CONTAINS PROBABLY RELEASES OF PCE. CANNOT ISSUE "NO FURTHER ACTION" LETTER. WILL NOTIFY IN FUTURE IF MORE SITE ASSESSMENT IS NECESSARY.</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	ABBY CAZIER (REGULATOR)	2/22/2007	
<u>LAWYER LETTER PETITION CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/29/2007	
<u>WATERBOARD LETTER ABEYANCE PETITION BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/3/2006	
<u>RESPONSE TO THE LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD (LRWQCB) ORDER FOR ADDITIONAL INVESTIGATION INFORMATION</u>	RESPONSE TO COMMENTS	ABBY CAZIER (REGULATOR)	10/31/2006	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>ORDER FOR ADDITIONAL INVESTIGATION INFORMATION</u>	13267 REQUIREMENT	ABBY CAZIER (REGULATOR)	10/4/2006	
<u>WATERBOARD LETTER SENDING PES BIG O TIRE INVESTIGATION REPORT</u>	TECHNICAL CORRESPONDEN CE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	8/22/2006	
<u>SOIL AND WATER INVESTIGATION REPORT</u>	SOIL AND WATER INVESTIGATION REPORT	ABBY CAZIER (REGULA TOR)	8/9/2006	
<u>RESULTS OF SOIL AND GROUNDWATER INVESTIGATIONS AT THE BIG O TIRE STORE SITE</u>	SOIL AND WATER INVESTIGATION REPORT	ABBY CAZIER (REGULA TOR)	8/9/2006	
<u>WATERBOARD LETTER CONDITIONAL APPROVAL REVISED WORKPLAN BIG O TIRES</u>	13267 REQUIREMENT	WILLIAM CHEN (REGULATOR)	6/2/2006	
<u>LAWYER LETTER DISPOSAL RECEIPT SOIL BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULAT OR)	5/2/2006	
<u>REQUIRES SUBMITTAL OF A REVISED SITE INVESTIGATION WORKPLAN.</u>	13267 REQUIREMENT	ABBY CAZIER (REGULATOR)	4/20/2006	
<u>EDR BIG O TIRES</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULA TOR)	3/28/2006	
<u>SOIL AND WATER INVESTIGATION WORKPLAN</u>	SOIL AND WATER INVESTIGATION WORKPLAN	ABBY CAZIER (REGULA TOR)	3/20/2006	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>AMENDED CAO. REQUIRES RESPONSIBLE PARTIES TO INVESTIGATION POTENTIAL SOLVENT DISCHARGES ON THE SITE.</u>	AMENDMENT TO ORDER	ABBY CAZIER (REGULATOR)	3/8/2006	
<u>WATERBOARD LETTER RECEIVED DRAFT CAO COMMENTS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	1/11/2006	
<u>LAWYER COMMENT DRAFT AMENDED CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/16/2005	
<u>WATERBOARD LETTER COMMENTS DRAFT AMENDED CAO BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	12/12/2005	
<u>LTW LAWYER RESPONSE COMMENTS CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/6/2005	
<u>WATERBOARD LETTER RECEIVED MORRISON CAO COMMENTS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/19/2005	
<u>WATERBOARD LETTER RECEIPT CAO COMMENTS 2111 DUNLAP</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/19/2005	
<u>WATERBOARD LETTER ABEYANCE PETITION BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/19/2005	
<u>LAWYER LETTER CORRECTION TO 2005 10 19 CORRESPONDENCE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/19/2005	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>LAWYER COMMENTS AMENDED CAO R6T-2033-031A1 BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/19/2005	
<u>LAWYER LETTER LTLW COMMENTS DRAFT AMENDED CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/4/2005	
<u>WATERBOARD LETTER EXTENSION CAO RESPONSE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	9/29/2005	
<u>LAWYER LETTER 2111 DUNLAP RESPONSE CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/20/2005	
<u>LAWYER LETTER REQUEST EXTENSION CAO RESPONSE BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/31/2005	
<u>WATERBOARD DRAFT AMENDED CAO BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	8/24/2005	
<u>WATERBOARD STAFF REPORT SOLVENT CONTAMINATION AT BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	8/22/2005	
<u>ELCEMD INSPECTION REPORT NOTICE OF CORRECTION BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	4/6/2005	
<u>WATERBOARD LETTER COMMENT INVESTIGATION WP BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	12/6/2004	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>PES COMMENTS WP ADDITIONAL INVESTIGATION BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/19/2004	
<u>WATERBOARD LETTER REMOVE MARK STRONG CAMCO BOT65 PRP LIST BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	3/1/2004	
<u>LAWYER LETTER CAO PRP LIST BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/29/2004	
<u>MARK STRONG LETTER SOLVENT USE PART CLEANER USED MSDS BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/29/2004	
<u>INSURANCE COVERAGE BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/16/2004	
<u>SIERRA PACIFIC GROUP REVIEW OF HYDROGEOLOGIC DATA BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/15/2004	
<u>WATERBOARD LETTER REVISED WORKPLAN EXTENSION APPROVAL BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	12/22/2003	
<u>SIERRA PACIFIC GROUP REQUEST EXTENSION REVISED WORKPLAN BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/12/2003	
<u>WATERBOARD LETTER SUBMIT REVISED WORKPLAN FOR SITE INVESTIGATION BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/25/2003	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WATERBOARD LETTER PETITION BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/30/2003	
<u>WATERBOARD LETTER DEADLINE EXTENSIONS FOR CAO BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/20/2003	
<u>WATERBOARD DISMISSAL OF PETITION BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/3/2003	
<u>LAWYER LETTER MATTER OF PETITION CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/26/2003	
<u>SIERRA PACIFIC GROUP COVER LETTER WP SOIL & GROUNDWATER INVESTIGATION BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/25/2003	
<u>PRELIMINARY WORK PLAN FOR ADDITIONAL INVESTIGATION OF CHLORINATED SOLVENTS IN SOIL AND GROUND WATER BIG O TIRE SITE</u>	SOIL AND WATER INVESTIGATION WORKPLAN	ABBY CAZIER (REGULATOR)	9/24/2003	
<u>SIERRA PACIFIC GROUP COVER LETTER WORK PLAN SOIL & GROUNDWATER INVESTIGATION BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/12/2003	
<u>WATERBOARD LETTER RECEIPT PETITION BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	9/5/2003	
<u>PETITION RECONSIDERATION CAO RB6S-2003-031</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/3/2003	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>LAWYER LETTER PETITION FOR RECONSIDERATION CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/3/2003	
<u>DECLARATION DAVID BARNETT SUPPORT PETITION FOR REVIEW CAO RB6S-2003-031</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/3/2003	
<u>LAWYER INTENT TO PETITION CAO BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/21/2003	
<u>DUNLAP DRIVE SEEKING TO RECOVER COSTS WELL CONTAMINATION</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/8/2003	
<u>PCE UNAUTHORIZED RELEASE FORM</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	8/4/2003	
<u>CLEAN-UP AND ABATEMENT ORDER</u>	CLEAN-UP AND ABATEMENT ORDER	ABBY CAZIER (REGULATOR)	8/4/2003	
<u>FACILITY ENFORCEMENT REPORT BIG O TIRE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/4/2003	
<u>LAWYER LETTER DRY CLEANER ACROSS STREET BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	6/3/2003	
<u>POTENTIAL RESPONSIBLE PARTY MEETING NOTIFICATION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	4/18/2003	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WATERBOARD LETTER POSTPONMENT ADDITIONAL GROUNDWATER INVESTIGATIONS BIG O TIRES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	2/22/2002	
<u>LAWYER NOTICE OF INTENT TO COMMENCE LEGAL ACTION BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/17/2002	
<u>LAWYER NOTICE OF INTENT TO COMMENCE LEGAL ACTION BIG O TIRES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/3/2002	
<u>WATERBOARD LETTER REQUEST FOR WORKPLAN FOR ADDITIONAL INVESTIGATION BIG O TIRES</u>	13267 REQUIREMENT	WILLIAM CHEN (REGULATOR)	1/2/2002	
<u>STPUD LETTER COMMENTS ON BIGO INVESTIGATION</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	11/29/2001	
<u>WATERBOARD FACILITY VIOLATION REPORT</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/19/2001	
<u>GROUNDWATER INVESTIGATION BIG-0 TIRE CENTER</u>	SOIL AND WATER INVESTIGATION REPORT	ABBY CAZIER (REGULATOR)	10/30/2001	
<u>APPROVAL OF WORKPLAN FOR GROUNDWATER INVESTIGATION AT 1961 LAKE TAHOE BOULEVARD</u>	STAFF LETTER	ABBY CAZIER (REGULATOR)	9/25/2001	
<u>PROPOSED WORK PLAN FOR GROUNDWATER INVESTIGATION AT 1961 LAKE TAHOE BOULEVARD</u>	SOIL AND WATER INVESTIGATION WORKPLAN - ADDENDUM	ABBY CAZIER (REGULATOR)	9/20/2001	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>PROPOSED WORK PLAN FOR GROUNDWATER INVESTIGATION AT 1961 LAKE TAHOE BOULEVARD</u>	SOIL AND WATER INVESTIGATION WORKPLAN	ABBY CAZIER (REGULATOR)	9/18/2001	
<u>LAWYER CORRESPONDENCE REGARDING PRP</u>	CORRESPONDENCE	ABBY CAZIER (REGULATOR)	9/5/2001	
<u>LAWYER CORRESPONDENCE REGARDING PRP</u>	CORRESPONDENCE	ABBY CAZIER (REGULATOR)	8/29/2001	
<u>LAWYER CORRESPONDENCE REGARDING PRP</u>	CORRESPONDENCE	ABBY CAZIER (REGULATOR)	8/24/2001	
<u>LETTER FROM WENDEL ROSSEN BLACK & DEAN ATTORNEYS AT LAW</u>	CORRESPONDENCE	ABBY CAZIER (REGULATOR)	8/23/2001	
<u>NOTICE TO SUBMIT WORKPLAN FOR INVESTIGATION AT 1961 LAKE TAHOE BOULEVARD, SOUTH LAKE TAHOE, EL DORADO COUNTY (APN 023-523-08)</u>	13267 REQUIREMENT	ABBY CAZIER (REGULATOR)	7/20/2001	
3. Petition Documents				
NO PETITION DOCUMENT SUBMITTALS FOUND FOR THIS FACILITY.				
4. Monitoring Reports				
NO MONITORING REPORT SUBMITTALS FOUND FOR THIS FACILITY.				

D. Community Involvement

1. Environmental Justice

[DWR 2016 DISADVANTAGED COMMUNITY DESIGNATION - INFO](#)

[Severely Disadvantaged Community](#)

[CALENVIROSCREEN 3.0 SCORE - INFO](#)

[CALENVIROSCREEN 4.0 SCORE - INFO](#)

[Percentile Range: 26-30%](#)

[Percentile Range: 45-50%](#)

2. Community Involvement Documents

UPDATES AND INFORMATION

<u>DOCUMENT TITLE</u>	<u>DOCUMENT TYPE</u>	<u>DOCUMENT COMMENT</u>	<u>DOCUMENT DATE</u>	<u>DOCUMENT SIZE</u>
cover email	Public Comment		6/22/2022	282KB
Fox's Requests re proposed CAOs	Public Comment		6/22/2022	121KB
PES comments on draft agenda	Public Comment		9/19/2021	138KB
Comments on Revised Phase 2 Work Plan	Public Comment		8/27/2021	95KB
email	Public Comment		6/8/2021	118KB
cover email	Public Comment		2/6/2021	19,544KB
Comments on Phase II Work Plan	Public Comment		2/6/2021	19,586KB
cover email	Public Comment		12/15/2020	19,253KB
Comments on PSG Investigation Report	Public Comment		12/15/2020	19,295KB
cover email	Public Comment		9/16/2020	495KB
Comments on Revised PSG Investigation Work Plan	Public Comment		9/16/2020	360KB
cover email	Public Comment		6/19/2020	18,948KB
comments	Public Comment		6/19/2020	18,990KB
Consideration of No Further Action--60 Day Notice for Comments	Notification - Public Notice of Case Closure		10/7/2015	170KB

III. FORMER NORMA'S CLEANERS (FORMERLY HURZEL PROPERTIES LLC) (SL0601790916) - (MAP)

[FORMER NORMA'S CLEANERS \(FORMERLY HURZEL PROPERTIES LLC\) \(SL0601790916\) - \(MAP\)](#)

961 EMERALD BAY ROAD
SOUTH LAKE TAHOE, CA 96150
EL DORADO COUNTY

CLEANUP OVERSIGHT AGENCIES
LAHONTAN RWQCB (REGION 6T) (LEAD) - CASE #: T6S044
CASEWORKER: BRIAN GREY

[CLEANUP PROGRAM SITE \(INFO\)](#)

A. Regulatory Activities

LINK	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Enforcement/Orders</i>	Deadline Extension	8/19/2022	8/19/2022	Comment Period Extended Comment Period Extended to September 19, 2022
	<i>Response Requested - Other</i>	Public Comment - Regulator Responded	8/17/2022	8/17/2022	Email from Tarantino re LTLW - Extension Request Renewal
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/1/2022	7/1/2022	email string regarding request for documents- requestor does not wish to proceed
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment - Regulator Responded	7/1/2022	7/1/2022	email from Thomas Bruen, Trestle South Tahoe LLC legal counsel, requesting documents referenced in the proposed CAO for Lake Tahoe Laundry Works
[VIEW DOCS]	<i>Enforcement/Orders</i>	Deadline Extension	6/27/2022	6/27/2022	Comment Period Extended Comment period extended to August 23, 2022
	<i>Response Requested - Other</i>	Public Comment	6/24/2022	6/24/2022	email transmittal from Seven Springs re Request for Comments-Cleanup and Abatement Orders R6T-2022-(Proposed) for the LTLW, Former Big O Tires, and Former Noma's Cleaners Sites - request for (1) copies of the supporting documents referenced in the proposed Cleanup and Abatement Order (CAO) for Lake Tahoe Laundry Works and (2) an extension to the comment period for proposed CAOs for Lake Tahoe Laundry Works, Big O Tires, and Former Norma's Cleaners
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	6/22/2022	6/22/2022	email re Fox's Requests re Proposed CAOs- request for (1) copies of the supporting documents referenced in the proposed Cleanup and Abatement Order (CAO) for Lake Tahoe Laundry Works and (2) an extension to the comment period for proposed CAOs for Lake Tahoe Laundry Works, Big O Tires, and Former Norma's Cleaners
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/16/2022	6/16/2022	Discharger Information memo to Site Cleanup Subaccount Program to support FAAST application 49805
[VIEW DOCS]	<i>Enforcement/Orders</i>	Clean-up and Abatement Order	6/16/2022	6/16/2022	Request for Comments - Cleanup and Abatement Order R6T-2022-(PROPOSED) for Former Norma's Cleaners

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	3/21/2022	3/21/2022	Email from Bruen to the State Water Board's SCAP contacts.
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	3/17/2022	3/17/2022	Letter from RMC Geoscience, Inc. to Jeff Brooks and Brian Grey. Subject: Lahontan Regional Water Quality Control Board February 8, 2022 Notice of Workplan Deficiency
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	3/14/2022	3/14/2022	Email summary of teleconference with Thomas Bruen (Trestle), Tamarin Austin (OCC), and LAURA Drambrabt (OE)
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	2/7/2022	2/7/2022	Notice of Deficient Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	12/1/2021	12/1/2021	Email from Peter Gorman of PES Environmental re Hurzel Site - PES Comments on RMC's Phase 2 Work Plan
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Proposed Plan	11/4/2021	11/4/2021	Phase 2 Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	10/14/2021	10/14/2021	Email from Pete Gorman of PES Environmental, Inc. re Hurzel Site- PES Comments
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	9/28/2021	9/28/2021	Email from Rick Mitchell of RMC re 9/27 teleconference follow-up
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	9/27/2021	9/27/2021	Email to Rick Mitchell re 9/27 teleconference follow-up. Comments on 9/3/2021 Phase II Work Plan document provided.
	<i>Other Regulatory Actions</i>	Meeting	9/27/2021	9/27/2021	Technical conference call. Attendees: Rick Mitchell of RMC, Brian Grey, Abby Cazier, and Jim Carolan of Lahontan Water Board. Discussed Phase 2 Work Plan submittal and identified deficiencies.
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan - Regulator Responded	9/3/2021	9/3/2021	Email transmittal of September 3, 2021 Phase 2 Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	8/27/2021	8/27/2021	Email from Bruen regarding work plan submittal
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/26/2021	8/26/2021	Transmittal of Information to Support Phase 2 Work Plan at Trestle SLT Property
	<i>Other Regulatory Actions</i>	Meeting	8/5/2021	8/5/2021	Teleconference attendees: Thomas Bruen, Tamarin Austin, Naomi Rubin, Jeff Brooks and Brian Grey. Discussed progress toward Order compliance. Rick Mitchell working with staff toward developing comprehensive work plan. Revised draft anticipated in about 10 days. Next check in meeting scheduled for August 26.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/5/2021	8/5/2021	Email to Mitchell summarizing August 4 teleconference
	<i>Other Regulatory Actions</i>	Verbal Communication	8/4/2021	8/4/2021	Teleconference with Rick Mitchell of RMC

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/4/2021	8/4/2021	Transmittal of Draft Framework for Discussion Phase 2 Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	7/26/2021	7/26/2021	Meeting scheduling email string
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/16/2021	7/16/2021	Email from Tamarin Austin summarizing discussion with Thomas Bruen
	<i>Other Regulatory Actions</i>	Meeting	7/16/2021	7/16/2021	OE/OCC meeting with Thomas Bruen
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	7/8/2021	7/8/2021	Email string with Rick Mitchell of RMC Geoscience, Inc. regarding June 21 telephone conversation and path forward. Indicated work plan may be forthcoming following discussions with Lahontan Water Board management and legal staff.
	<i>Other Regulatory Actions</i>	Verbal Communication	6/21/2021	6/21/2021	Telephone conversation with Rick Mitchell of RMC Geoscience, Inc. Discussed need for comprehensive work plan to address Order requirements. Will check with client and likely proceed with work plan development.
	<i>Response Requested - Other</i>	Email Correspondence	6/7/2021	6/7/2021	email from Rick Frost Hurzel
	<i>Other Regulatory Actions</i>	Meeting	6/4/2021	6/4/2021	Administrative Civil Liability Complaint teleconference - attendees Rick Frost Hurzel, Naomi Rubin (Office of Enforcement), Scott Ferguson, Jeff Brooks, and Brian Grey (Lahontan Water Board).
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	5/14/2021	5/14/2021	Email form PES Environmental Inc. (consultant for Lake Tahoe Laundry Works site) transmitting Comments on RMC Geoscience, Inc. Soil Vapor Probe Investigation Report
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	4/30/2021	4/30/2021	email from Thomas Bruen re Administrative Civil Liability Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	4/30/2021	4/30/2020	Response to Third Notice of Violation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/29/2021	4/29/2021	Administrative Civil Liability Investigation
[VIEW DOCS]	<i>Enforcement/Orders</i>	Notice of Violation	4/15/2021	4/15/2021	Third Notice of Violation
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Assessment Report	2/17/2021	2/17/2021	Results of Soil Vapor Probe Investigation dated February 10, 2021`
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	1/13/2021	1/13/2021	email discussing report submittal status
[VIEW DOCS]	<i>Response Requested - Other</i>	Public Comment	12/22/2020	12/22/2020	Comments on Investigation Work Plan provided by PES Environmental, Inc.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/2/2020	11/2/2020	Letter from Thomas Bruen re Trestle South Lake, LLC -- 961 Emerald Bay Road, South Lake Tahoe
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	10/27/2020	10/27/2020	Email string with Rick Mitchell re revised work plan sample locations
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	10/21/2020	10/21/2020	Email from Mitchell transmitting proposed soil vapor probe locations

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Verbal Communication	10/18/2020	10/18/2020	Spoke with Rick Mitchell regarding work plan development
	<i>Other Regulatory Actions</i>	Meeting	10/15/2020	10/15/2020	Teleconference with Thomas Bruen, Rick Mitchell, Tamarin Austin, Jeff Brooks, Abby Cazier, and Brian Grey to discuss cover letter and conceptual work plan. Discussed conducting passive soil gas sampling as initial phase of investigation this year. Will provide updated figure and work plan related to passive soil gas sampling.
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan	10/5/2020	10/5/2020	Email from Bruen transmitting a letter dated October 5, 2020 and the September 30, 2020 Conceptual Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	9/15/2020	9/15/2020	email string re work plan submittal update
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/26/2020	8/26/2020	email string re status update.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/13/2020	8/13/2020	Email followup to August 4 meeting. Requested work plan submittal schedule update.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	8/4/2020	8/4/2020	Teleconference held. Attendees included Thomas Bruen (Trestle South Tahoe [TST] LLC legal representative), Rick Mitchell (TST consultant, Jeff Brooks (Lahontan Water Board [LWB]), Abby Cazier (LWB), Brian Grey (LWB) and Tamarin Austin (LWB legal)
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/4/2020	8/4/2020	Meeting follow-up. Email transmitting geotracker links.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/28/2020	7/28/2020	Email string between Thomas Bruen and Tamarin Austin regarding Staff's answers to questions and potential August 4 meeting date
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/23/2020	7/23/2020	Email providing relevant documents to Rick Mitchell of Geo-logic Associates
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	7/23/2020	7/23/2020	Email from Thomas Bruen to Tamarin Austin providing call summary addition
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/22/2020	7/22/2020	Email from Tamarin Austin to Thomas Bruen summarizing 7/22 telephone conversation and action items
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/17/2020	7/17/2020	Email Correspondence between Tom Bruen and Tamarin Austin regarding Trestle South Tahoe LLC legal representation. Future correspondence to include Thomas Bruen, Law Offices of Thomas M. Bruen, P.C.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/15/2020	7/15/2020	Email from Tamarin Austin to Andrew Giorgianni summarizing 7/13 teleconference

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	7/13/2020	7/13/2020	Meeting with Andy Giorgianni to discuss 13267 Order requirements for the Site and Trestle South Lake Tahoe is a Responsible Party. Attendees included: Andrew Giorgianni (Rodriguez Wright), Tamarin Austin (State Water Board Office of Chief Counsel), Naomi Rubin (State Water Board Office of Enforcement), Jeff Brooks (Lahontan Regional Water Board), and Abby Cazier (Lahontan Regional Water Board).
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	6/18/2020	6/18/2020	Email requesting teleconference to discuss intentions and path forward.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	4/22/2020	4/22/2020	Response to January 28, 2020 Letter re 961 Emerald Bay Road and Removal of Rick Frost Hurzel as Responsible Party
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	4/21/2020	4/21/2020	Response to January 30, 2020 Letter re 961 Emerald Bay Road
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	1/30/2020	1/30/2020	Email response from Giorgianni re Second NOV - Trestle South Tahoe
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	1/29/2020	1/29/2020	Email transmittal from Reid re Second NOV - Frost Hurzel
	<i>Other Regulatory Actions</i>	Verbal Communication	1/21/2020	1/21/2020	Returned call to Rick Frost-Hurzel. Discussed Second NOV and what he could reasonable do since he does not control access. Mr. Frost-Hurzel indicated that we should be receiving response from Hurzel Properties LLC's attorney related to notice (ie LLC was dissolved and shouldn't be receiving notices). Mentioned February 27 South Y PCE Technical meeting. Indicated we would keep him apprised of issues as they proceed.
[VIEW DOCS]	<i>Enforcement/Orders</i>	Notice of Violation	1/10/2020	1/10/2020	Second Notice of Violation
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	9/24/2019	9/24/2019	Letter from Andrew Giorgianni re 961 Emerald Bay Road. In response to August 27, 2019 notice of violation letter from Lahontan Water Board.
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	9/20/2019	9/23/2019	Letter and questionnaire regarding Mr. Suds, LLC. received from Mr. Thomas Chiappa
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	9/10/2019	9/10/2019	Order to Submit Technical Reports in Accordance with Section 13267 of the California Water Code - Mr. Suds, LLC
	<i>Response Requested - Other</i>	Verbal Communication	9/3/2019	9/3/2019	Rick Frost-Hurzel called to confirm that we had received signed questionnaire. Indicated that we would contact him directly if we needed anything else.
[VIEW DOCS]	<i>Response Requested - Other</i>	Questionnaire Response	9/3/2019	9/3/2019	Questionnaire submittal from Mr. Frost-Hurzel
[VIEW DOCS]	<i>Enforcement/Orders</i>	Notice of Violation	8/27/2019	8/27/2019	Notice of Violation, Order to Submit Technical Reports in Accordance with Section 13267 of California Water Code

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/23/2019	8/23/2019	Comments on Previous Site Characterization and Remediation Hurzel Properties, LLC dated August 23, 2019 provided by PES Environmental, Inc.
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Site Investigation Workplan	7/10/2019	9/3/2021	Phase II Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence - Regulator Responded	7/10/2019	10/30/2020	Email transmitting Trestle South Lake Tahoe SVP Work Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	7/10/2019	6/3/2019	Response to May 10, 2019 Order to Submit Technical Report from Rick Frost Hurzel
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Site Investigation Workplan	7/10/2019	10/30/2020	Investigation Work Plan to Address the Lahontan Regional Water Quality Control Board Section 13267 Technical Report Requirements for the Property Located at 961 Emerald Bay Road,
	<i>Other Regulatory Actions</i>	Verbal Communication	6/25/2019	6/25/2019	Spoke with Andy Giorgiani (sp?), attorney representing Trestle So Tahoe LLC. Discussed directive letter received. Requested his contact info in order for him to be put in contact with our legal counsel.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	6/25/2019	6/25/2019	Email response from Trestle Tahoe So LLC re 961 Emerald Bay Rd - GeoTracker No. SL0601790916 includes questionnaire and Phase 1 ESA dated May 11, 2015.
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	5/10/2019	5/10/2019	Order to Submit Technical Reports
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Closure/No Further Action Letter	2/11/2009	2/11/2009	No further action required for Hurzel Property at 949 Emerald Bay Rd.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	12/23/2008	12/23/2008	Third Quarter 2008 Water Quality Report
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	12/15/2008	12/23/2008	Third Quarter 2008 Water Quality Report - All downgradient wells show PCE concentrations less than the PCE concentration in the upgradient well: 400 ppb vs 1300 ppb. Report recommends site closure.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	8/26/2008	8/26/2008	Second Quarter 2008 Water Quality Report
	<i>Response Requested - Reports</i>	Monitoring Report - Quarterly	8/21/2008	8/26/2008	Second Quarter 2008 Water Quality Report
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Investigation Complete	5/30/2008	6/2/2008	Site Investigation Report
	<i>Other Regulatory Actions</i>	Verbal Communication	4/23/2008	4/23/2008	The consultant was contacted about the delinquent groundwater monitoring report for first quarter 2008. The consultant replied that it will be submitted late by mid-May.
	<i>Response Requested - Reports</i>	CAP/RAP - Other Report	*3/30/2008	6/2/2008	Corrective Action Report
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	2/17/2008	2/17/2008	Verified that excavation was filled in and topped with asphalt.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Notices</i>	Notification - Public Notice of ROD/RAP/CAP	2/6/2008	2/6/2008	Second authorization to conduct soil disturbance activities to remove PCE-contaminated soil.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	2/5/2008	2/5/2008	Observed snow removal being completed and clean material being stockpiled on site. Excavation will be backfill, compacted and covered with asphalt by end of this week.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	1/15/2008	1/15/2008	Observed soil excavation activities at site.
	<i>Notices</i>	Notification - Public Notice of ROD/RAP/CAP	1/14/2008	1/14/2008	Second authorization to conduct soil disturbance activities to remove PCE-contaminated soil.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	1/14/2008	1/14/2008	Authorization to conduct soil disturbance activities Letter re-authorizes Secor to conduct soil disturbance activities in Jan., which were delayed by inclement weather in Dec.
	<i>Notices</i>	Notification - Public Notice of ROD/RAP/CAP	12/14/2007	12/14/2007	Second authorization to conduct soil disturbance activities to remove PCE-contaminated soil.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	12/14/2007	12/14/2007	Authorization to conduct soil disturbance activities Water Board letter authorized Secor to conduct soil disturbance activities during winter for interim PCE remediation activities
	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	10/12/2007	12/10/2007	Investigation Progress Report - Preliminary investigation report for soil and groundwater contaminated with PCE.
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/22/2007	8/22/2007	Acceptance of corrective action workplan for site assessment and pilot studies. Accepts schedule for preliminary investigation report by Oct. 12, 2007 and final report by Dec. 14, 2007.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	8/22/2007	8/22/2007	Acceptance of Corrective Action Workplan Water Board letter accepts the July 18, 2007 workplan for corrective actions for remediating PCE in soil and groundwater. Workplan discusses conducting additional site investigations, a pilot test using permanganate, and installing four monitoring wells. Investigation report is due by Oct. 12, 2007.
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	7/18/2007	7/18/2007	Work Plan for Soil and Groundwater Characterization and In-Situ Chemical Oxidation Pilot Study
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/18/2007	5/18/2007	Request for Cleanup Plan for PCE contamination in soil and groundwater.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	Notices	Letter - Notice	5/18/2007	5/18/2007	Request for Clean up Plan Based on PCE data in soil and shallow groundwater, letter requests a clean up plan within 60 days. Up to 450 ppb PCE detected in groundwater but 280 ppb may be from an upgradient source.
	Other Regulatory Actions	Site Visit / Inspection / Sampling	5/8/2007	5/8/2007	Met with RP to discuss conducting potential cleanup actions at site.
[VIEW DOCS]	Notices	Letter - Notice	12/2/2003	12/2/2003	Tetrachloroethene Report of Findings Letter acknowledges the initial report of PCE in soil at the laundromat. No action at this time while we await the results of investigations at other sites.
[VIEW DOCS]	Response Requested - Reports	Soil and Water Investigation Report	11/3/2003	11/3/2003	Report of Findings Potential PCE Source Investigation
[VIEW DOCS]	Enforcement/Orders	13267 Requirement	7/8/2003	7/8/2003	Notice to Submit Groundwater and Soil Investigation Work Plan
[VIEW DOCS]	Other Regulatory Actions	Staff Letter	2/19/2002	2/19/2002	Comments on Groundwater Investigation
	Leak Action	Leak Reported	1/11/2002		
[VIEW DOCS]	Response Requested - Reports	Soil and Water Investigation Report	12/12/2001	12/12/2001	Groundwater Investigation Hurzel Properties LLC
	Leak Action	Leak Discovery	11/20/2001		
	Leak Action	Leak Stopped	12/1/1977		
	Cleanup Action		12/1/1977		
	Leak Action	Leak Began	1/1/1976		
	Enforcement - Other	UNK			
	Enforcement - Other	UNK			
	Enforcement - Other	UNK			

B. ENVIRONMENTAL DATA

1. Individual Well Analytical Data

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
QCTB	Soil Gas					
SVP-1	Soil Gas					
SVP-1 DUP	Soil Gas					
SVP-10	Soil Gas					
SVP-11	Soil Gas					
SVP-11 DUP	Soil Gas					
SVP-12	Soil Gas					
SVP-14	Soil Gas					
SVP-15	Soil Gas					
SVP-16	Soil Gas					
SVP-17	Soil Gas					
SVP-18	Soil Gas					
SVP-19	Soil Gas					
SVP-2	Soil Gas					
SVP-20	Soil Gas					
SVP-22	Soil Gas					
SVP-22 DUP	Soil Gas					
SVP-23	Soil Gas					
SVP-23 DUP	Soil Gas					
SVP-24	Soil Gas					
SVP-25	Soil Gas					
SVP-26	Soil Gas					
SVP-26 DUP	Soil Gas					
SVP-3	Soil Gas					
SVP-3 DUP	Soil Gas					
SVP-4	Soil Gas					
SVP-5	Soil Gas					
SVP-6	Soil Gas					
SVP-7	Soil Gas					
SVP-8	Soil Gas					
SVP-9	Soil Gas					

2. Laboratory Analytical Reports (EDF)

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>	
NOVEMBER 2020 PASSIVE SOIL GAS INVESTIGATION...	Q4 2020	RICHARD MITCHELL	4/28/2021	VIEW NARRATIVE DATA

3. Well Latitude / Longitude Data (GEO_XY)

NO GEO_XY SUBMITTALS FOR THIS FACILITY.

4. Well Survey Data (GEO_Z)

NO GEO_Z SUBMITTALS FOR THIS FACILITY.

5. Well Depth to Water Data (GEO_WELL)

NO GEO_WELL SUBMITTALS FOR THIS FACILITY.

C. SITE MAPS DOCUMENTS

1. Site Maps (GEO_MAP), Boring Logs (GEO_BORE) and KML / KMZ Files

NO SITE MAP SUBMITTALS FOUND FOR THIS FACILITY.

2. Site Documents

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>COMMENT PERIOD EXTENDED</u>	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	8/19/2022	
<u>EMAIL STRING REGARDING REQUEST FOR DOCUMENTS- REQUESTOR DOES NOT WISH TO PROCEED</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/1/2022	
<u>EMAIL FROM THOMAS BRUEN, TRESTLE SOUTH TAHOE LLC LEGAL COUNSEL, REQUESTING DOCUMENTS REFERENCED IN THE PROPOSED CAO FOR LAKE TAHOE LAUNDRY WORKS</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	7/1/2022	
<u>COMMENT PERIOD EXTENDED</u>	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	6/27/2022	
<u>EMAIL RE FOX'S REQUESTS RE PROPOSED CAOS- REQUEST FOR (1) COPIES OF THE SUPPORTING DOCUMENTS REFERENCED IN THE PROPOSED CLEANUP AND ABATEMENT ORDER (CAO) FOR LAKE TAHOE LAUNDRY WORKS AND (2) AN EXTENSION TO THE COMMENT PERIOD FOR PROPOSED CAOS FOR LAKE TAHOE LAUNDRY WORKS, BIG O TIRES, AND FORMER NORMA'S CLEANERS</u>	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	6/22/2022	
<u>REQUEST FOR COMMENTS - CLEANUP AND ABATEMENT ORDER R6T-2022-(PROPOSED) FOR FORMER NORMA'S CLEANERS</u>	CLEAN-UP AND ABATEMENT ORDER	BRIAN GREY (REGULATOR)	6/16/2022	
<u>DISCHARGER INFORMATION MEMO TO SITE CLEANUP SUBACCOUNT PROGRAM TO SUPPORT FAAST APPLICATION 49805</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	6/16/2022	
<u>EMAIL FROM BRUEN TO THE STATE WATER BOARD'S SCAP CONTACTS.</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/21/2022	
<u>LETTER FROM RMC GEOSCIENCE, INC. TO JEFF BROOKS AND BRIAN GREY. SUBJECT: LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD FEBRUARY 8, 2022 NOTICE OF WORKPLAN DEFICIENCY</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/17/2022	
<u>EMAIL SUMMARY OF TELECONFERENCE WITH THOMAS BRUEN (TRESTLE), TAMARIN AUSTIN (OCC), AND LAURA DRAMBABT (OE)</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/14/2022	
<u>NOTICE OF DEFICIENT WORK PLAN</u>	STAFF LETTER	BRIAN GREY (REGULATOR)	2/7/2022	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
EMAIL FROM PETER GORMAN OF PES ENVIRONMENTAL RE HURZEL SITE - PES COMMENTS ON RMC'S PHASE 2 WORK PLAN	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	12/1/2021	
PHASE 2 WORK PLAN	PROPOSED PLAN	RICHARD MITCHELL (AUTH_RP)	10/22/2021	37,936 KB
EMAIL FROM PETE GORMAN OF PES ENVIRONMENTAL, INC. RE HURZEL SITE- PES COMMENTS	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	10/14/2021	
EMAIL FROM RICK MITCHELL OF RMC RE 9/27 TELECONFERENCE FOLLOW-UP	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/28/2021	
EMAIL TO RICK MITCHELL RE 9/27 TELECONFERENCE FOLLOW-UP. COMMENTS ON 9/3/2021 PHASE II WORK PLAN DOCUMENT PROVIDED.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/27/2021	
EMAIL TRANSMITTAL OF SEPTEMBER 3, 2021 PHASE 2 WORK PLAN	SOIL AND WATER INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	9/3/2021	
PHASE II WORK PLAN	SITE INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	9/3/2021	
EMAIL FROM BRUEN REGARDING WORK PLAN SUBMITTAL	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/27/2021	
TRANSMITTAL OF INFORMATION TO SUPPORT PHASE 2 WORK PLAN AT TRESTLE SLT PROPERTY	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	8/26/2021	
EMAIL TO MITCHELL SUMMARIZING AUGUST 4 TELECONFERENCE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/5/2021	
TRANSMITTAL OF DRAFT FRAMEWORK FOR DISCUSSION PHASE 2 WORK PLAN	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	8/4/2021	
MEETING SCHEDULING EMAIL STRING	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/26/2021	
EMAIL FROM TAMARIN AUSTIN SUMMARIZING DISCUSSION WITH THOMAS BRUEN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/16/2021	
EMAIL STRING WITH RICK MITCHELL OF RMC GEOSCIENCE, INC. REGARDING JUNE 21 TELEPHONE CONVERSATION AND PATH FORWARD. INDICATED WORK PLAN MAY BE FORTHCOMING FOLLOWING DISCUSSIONS WITH LAHONTAN WATER BOARD MANAGEMENT AND LEGAL STAFF.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/8/2021	
EMAIL FORM PES ENVIRONMENTAL INC. (CONSULTANT FOR LAKE TAHOE LAUNDRY WORKS SITE) TRANSMITTING COMMENTS ON RMC GEOSCIENCE, INC. SOIL VAPOR PROBE INVESTIGATION REPORT	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	5/14/2021	
EMAIL FROM THOMAS BRUEN RE ADMINISTRATIVE CIVIL LIABILITY INVESTIGATION	CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/30/2021	
ADMINISTRATIVE CIVIL LIABILITY INVESTIGATION	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	4/29/2021	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
THIRD NOTICE OF VIOLATION	NOTICE OF VIOLATION	JEFF BROOKS (REGULATOR)	4/15/2021	
RESULTS OF SOIL VAPOR PROBE INVESTIGATION DATED FEBRUARY 10, 2021`	SITE ASSESSMENT REPORT	BRIAN GREY (REGULATOR)	2/17/2021	
RESULTS OF SOIL VAPOR PROBE INVESTIGATION	REMEDIATION INVESTIGATION REPORT	RICHARD MITCHELL (AUTH_RP)	2/10/2021	23,578 KB
EMAIL DISCUSSING REPORT SUBMITTAL STATUS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/13/2021	
COMMENTS ON INVESTIGATION WORK PLAN PROVIDED BY PES ENVIRONMENTAL, INC.	PUBLIC COMMENT	BRIAN GREY (REGULATOR)	12/22/2020	
LETTER FROM THOMAS BRUEN RE TRESTLE SOUTH LAKE, LLC -- 961 EMERALD BAY ROAD, SOUTH LAKE TAHOE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/2/2020	
INVESTIGATION WORK PLAN TO ADDRESS THE LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD SECTION 13267 TECHNICAL REPORT REQUIREMENTS FOR THE PROPERTY LOCATED AT 961 EMERALD BAY ROAD,	SITE INVESTIGATION WORKPLAN	BRIAN GREY (REGULATOR)	10/30/2020	
EMAIL TRANSMITTING TRESTLE SOUTH LAKE TAHOE SVP WORK PLAN	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/30/2020	
EMAIL STRING WITH RICK MITCHELL RE REVISED WORK PLAN SAMPLE LOCATIONS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/27/2020	
EMAIL FROM MITCHELL TRANSMITTING PROPOSED SOIL VAPOR PROBE LOCATIONS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/21/2020	
EMAIL FROM BRUEN TRANSMITTING A LETTER DATED OCTOBER 5, 2020 AND THE SEPTEMBER 30, 2020 CONCEPTUAL WORK PLAN	OTHER WORKPLAN	BRIAN GREY (REGULATOR)	10/5/2020	
EMAIL STRING RE WORK PLAN SUBMITTAL UPDATE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/15/2020	
EMAIL STRING RE STATUS UPDATE.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/26/2020	
EMAIL FOLLOWUP TO AUGUST 4 MEETING. REQUESTED WORK PLAN SUBMITTAL SCHEDULE UPDATE.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/13/2020	
TELECONFERENCE HELD. ATTENDEES INCLUDED THOMAS BRUEN (TRESTLE SOUTH TAHOE [TST] LLC LEGAL REPRESENTATIVE), RICK MITCHELL (TST CONSULTANT, JEFF BROOKS (LAHONTAN WATER BOARD [LWB]), ABBY CAZIER (LWB), BRIAN GREY (LWB) AND TAMARIN AUSTIN (LWB LEGAL)	MEETING	BRIAN GREY (REGULATOR)	8/4/2020	
MEETING FOLLOW-UP. EMAIL TRANSMITTING GEOTRACKER LINKS.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	8/4/2020	
EMAIL STRING BETWEEN THOMAS BRUEN AND TAMARIN AUSTIN REGARDING STAFF'S ANSWERS TO QUESTIONS AND POTENTIAL AUGUST 4 MEETING DATE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/28/2020	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
EMAIL FROM THOMAS BRUEN TO TAMARIN AUSTIN PROVIDING CALL SUMMARY ADDITION	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/23/2020	
EMAIL PROVIDING RELEVANT DOCUMENTS TO RICK MITCHELL OF GEO-LOGIC ASSOCIATES	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/23/2020	
EMAIL FROM TAMARIN AUSTIN TO THOMAS BRUEN SUMMARIZING 7/22 TELEPHONE CONVERSATION AND ACTION ITEMS	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/22/2020	
EMAIL CORRESPONDENCE BETWEEN TOM BRUEN AND TAMARIN AUSTIN REGARDING TRESTLE SOUTH TAHOE LLC LEGAL REPRESENTATION. FUTURE CORRESPONDENCE TO INCLUDE THOMAS BRUEN, LAW OFFICES OF THOMAS M. BRUEN, P.C.	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	7/17/2020	
EMAIL FROM TAMARIN AUSTIN TO ANDREW GIORGIANNI SUMMARIZING 7/13 TELECONFERENCE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	7/15/2020	
MEETING WITH ANDY GIORGIANNI TO DISCUSS 13267 ORDER REQUIREMENTS FOR THE SITE AND TRESTLE SOUTH LAKE TAHOE IS A RESPONSIBLE PARTY. ATTENDEES INCLUDED: ANDREW GIORGIANNI (RODRIGUEZ WRIGHT), TAMARIN AUSTIN (STATE WATER BOARD OFFICE OF CHIEF COUNSEL), NAOMI RUBIN (STATE WATER BOARD OFFICE OF ENFORCEMENT), JEFF BROOKS (LAHONTAN REGIONAL WATER BOARD), AND ABBY CAZIER (LAHONTAN REGIONAL WATER BOARD).	MEETING	ABBY CAZIER (REGULATOR)	7/13/2020	
EMAIL REQUESTING TELECONFERENCE TO DISCUSS INTENTIONS AND PATH FORWARD.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/18/2020	
RESPONSE TO THIRD NOTICE OF VIOLATION	CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/30/2020	
RESPONSE TO JANUARY 28, 2020 LETTER RE 961 EMERALD BAY ROAD AND REMOVAL OF RICK FROST HURZEL AS RESPONSIBLE PARTY	STAFF LETTER	BRIAN GREY (REGULATOR)	4/22/2020	
RESPONSE TO JANUARY 30, 2020 LETTER RE 961 EMERALD BAY ROAD	STAFF LETTER	BRIAN GREY (REGULATOR)	4/21/2020	
EMAIL RESPONSE FROM GIORGIANNI RE SECOND NOV - TRESTLE SOUTH TAHOE	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/30/2020	
EMAIL TRANSMITTAL FROM REID RE SECOND NOV - FROST HURZEL	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/29/2020	
SECOND NOTICE OF VIOLATION	NOTICE OF VIOLATION	BRIAN GREY (REGULATOR)	1/10/2020	
LETTER FROM ANDREW GIORGIANNI RE 961 EMERALD BAY ROAD. IN RESPONSE TO AUGUST 27, 2019 NOTICE OF VIOLATION LETTER FROM LAHONTAN WATER BOARD.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/24/2019	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
LETTER AND QUESTIONNAIRE REGARDING MR. SUDS, LLC. RECEIVED FROM MR. THOMAS CHIAPPA	CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/23/2019	
ORDER TO SUBMIT TECHNICAL REPORTS IN ACCORDANCE WITH SECTION 13267 OF THE CALIFORNIA WATER CODE - MR. SUDS, LLC	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	9/10/2019	
QUESTIONNAIRE SUBMITTAL FROM MR. FROST-HURZEL	QUESTIONNAIRE RESPONSE	BRIAN GREY (REGULATOR)	9/3/2019	
NOTICE OF VIOLATION, ORDER TO SUBMIT TECHNICAL REPORTS IN ACCORDANCE WITH SECTION 13267 OF CALIFORNIA WATER CODE	NOTICE OF VIOLATION	JEFF BROOKS (REGULATOR)	8/27/2019	
COMMENTS ON PREVIOUS SITE CHARACTERIZATION AND REMEDIATION HURZEL PROPERTIES, LLC DATED AUGUST 23, 2019 PROVIDED BY PES ENVIRONMENTAL, INC.	OTHER REPORT / DOCUMENT	JEFF BROOKS (REGULATOR)	8/23/2019	
EMAIL RESPONSE FROM TRESTLE TAHOE SO LLC RE 961 EMERALD BAY RD - GEOTRACKER NO. SL0601790916 INCLUDES QUESTIONNAIRE AND PHASE 1 ESA DATED MAY 11, 2015.	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/25/2019	
RESPONSE TO MAY 10, 2019 ORDER TO SUBMIT TECHNICAL REPORT FROM RICK FROST HURZEL	CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/3/2019	
ORDER TO SUBMIT TECHNICAL REPORTS	13267 REQUIREMENT	BRIAN GREY (REGULATOR)	5/10/2019	
NO FURTHER ACTION REQUIRED FOR HURZEL PROPERTY AT 949 EMERALD BAY RD.	CLOSURE/NO FURTHER ACTION LETTER	STEVEN KENT (REGULATOR)	2/11/2009	
SITE INVESTIGATION REPORT	SITE INVESTIGATION COMPLETE	LISA DERNBACH (REGULATOR)	6/2/2008	
AUTHORIZATION TO CONDUCT SOIL DISTURBANCE ACTIVITIES	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	1/14/2008	
AUTHORIZATION TO CONDUCT SOIL DISTURBANCE ACTIVITIES	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	12/14/2007	
ACCEPTANCE OF CORRECTIVE ACTION WORKPLAN	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	8/22/2007	
WORK PLAN FOR SOIL AND GROUNDWATER CHARACTERIZATION AND IN-SITU CHEMICAL OXIDATION PILOT STUDY	SOIL AND WATER INVESTIGATION WORKPLAN	ABBY CAZIER (REGULATOR)	7/18/2007	
REQUEST FOR CLEAN UP PLAN	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	5/18/2007	
TETRACHLOROETHENE REPORT OF FINDINGS	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	12/2/2003	
REPORT OF FINDINGS POTENTIAL PCE SOURCE INVESTIGATION	SOIL AND WATER INVESTIGATION REPORT	ABBY CAZIER (REGULATOR)	11/3/2003	
NOTICE TO SUBMIT GROUNDWATER AND SOIL INVESTIGATION WORK PLAN	13267 REQUIREMENT	ABBY CAZIER (REGULATOR)	7/8/2003	
COMMENTS ON GROUNDWATER INVESTIGATION	STAFF LETTER	ABBY CAZIER (REGULATOR)	2/19/2002	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
GROUNDWATER INVESTIGATION HURZEL PROPERTIES LLC	SOIL AND WATER INVESTIGATION REPORT	ABBY CAZIER (REGULATOR)	12/12/2001	

3. Petition Documents

NO PETITION DOCUMENT SUBMITTALS FOUND FOR THIS FACILITY.

4. Monitoring Reports

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
THIRD QUARTER 2008 WATER QUALITY REPORT - THIRD QUARTER 2008 MONITORING REPORT	MONITORING REPORT - LISA QUARTERLY	DERNBACH (REGULATOR)	12/23/2008	4,693 KB
SECOND QUARTER 2008 WATER QUALITY REPORT - SECOND QUARTER 2008 MONITORING REPORT	MONITORING REPORT - LISA QUARTERLY	DERNBACH (REGULATOR)	8/26/2008	3,588 KB

D. COMMUNITY INVOLVEMENT

1. Environmental Justice

[DWR 2016 DISADVANTAGED COMMUNITY DESIGNATION - INFO](#)

Disadvantaged Community

[CALENVIROSCREEN 3.0 SCORE - INFO](#)

[Percentile Range: 21-25%](#)

[CALENVIROSCREEN 4.0 SCORE - INFO](#)

[Percentile Range: 40-45%](#)

2. Community Involvement Documents

UPDATES AND INFORMATION

<u>DOCUMENT TITLE</u>	<u>DOCUMENT TYPE</u>	<u>DOCUMENT COMMENT</u>	<u>DOCUMENT DATE</u>	<u>DOCUMENT SIZE</u>
email	Public Comment		7/1/2022	179KB
cover email	Public Comment		6/22/2022	282KB
Fox's Requests re proposed CAOs	Public Comment		6/22/2022	121KB
email	Public Comment		12/1/2021	240KB
Phase 2 Work Plan	Proposed Plan	Proposed Plan	10/22/2021	37,936KB
email re Hurzel Site- PES Comments	Public Comment		10/14/2021	164KB
cover email	Public Comment		5/14/2021	3,495KB
Comments on RMC Geoscience, Inc. Soil Vapor Probe Investigation Report	Public Comment		5/14/2021	3,387KB
cover email	Public Comment		12/22/2020	2,497KB
Comments on Investigation Work Plan	Public Comment		12/22/2020	2,381KB
Authorization to conduct soil disturbance activities	Letter - Notice		1/14/2008	51KB
Authorization to conduct soil disturbance activities	Letter - Notice		12/14/2007	58KB
Acceptance of Corrective Action Workplan	Letter - Notice		8/22/2007	58KB
Request for Clean up Plan	Letter - Notice		5/18/2007	57KB
Tetrachloroethene Report of Findings	Letter - Notice		12/2/2003	

IV. SOUTH Y REGIONAL CONTAMINATION (FORMERLY LUKIN WELLS 2 & 5) (T10000007984) - (MAP)

[SOUTH Y REGIONAL CONTAMINATION \(FORMERLY LUKIN WELLS 2 & 5\) \(T10000007984\) - \(MAP\)](#)

2133 12TH STREET
SOUTH LAKE TAHOE, CA 96150
EL DORADO COUNTY

CLEANUP OVERSIGHT AGENCIES
LAHONTAN RWQCB (REGION 6T) (LEAD) - CASE #: T6S077
CASEWORKER: BRIAN GREY

[CLEANUP PROGRAM SITE \(INFO\)](#)

[EL DORADO COUNTY](#)

A. Regulatory Activities

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	6/10/2022	6/10/2022	Regional Plume Characterization Summary Report: South Y PCE Plume 2019-2020 Field Season
[VIEW DOCS]	<i>Response Requested - Reports</i>	Well Installation Report	12/23/2021	12/23/2021	Sentry Well Installation Summary Report: South Y PCE Plume
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	12/10/2021	12/10/2021	SCAP Regional PCE Plume Investigation Project Update - Sentry Well Sampling Results
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Soil Vapor Intrusion Investigation Workplan	10/5/2021	10/5/2021	FINAL SLT South Y PCE Plume Area Soil Gas Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/20/2021	8/20/2021	SCAP Regional PCE Plume Investigation Project Update to Interested Parties
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/23/2021	7/23/2021	SCAP Regional PCE Plume Investigation Project Update to Interested Parties
	<i>Notices</i>	Letter - Notice	7/2/2021	7/2/2021	LBWC #5 back online with GAC wellhead treatment
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	3/25/2021	3/25/2021	March 25, 2021 SAG Workshop Meeting Materials (include AECOM's update on the SCAP Regional PCE Plume Investigation Activities)
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/23/2020	11/23/2020	Silver State Analytical Laboratories, Analytical Laboratory Report for Sampling at LBWC #1 on November 23, 2020 by Lukins Brothers Water Company
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/6/2020	10/6/2020	Table Summarizing PCE Sampling Results in Tahoe Keys Water Company Supply Wells from 2020
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	8/21/2020	8/21/2020	August 21, 2020 SCAP Update to Interested Parties

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	7/27/2020	7/27/2020	Email from Lukins Brothers Water Company Summarizing PCE Detections in LBWC #5
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/27/2020	7/27/2020	Email from District Provide Analytical Database for South Y Wells
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	7/13/2020	7/13/2020	July 13, 2020 SCAP Update to Interested Parties
[VIEW DOCS]	<i>Response Requested - Reports</i>	Feasibility Study Report	5/10/2020	5/10/2020	South Y PCE Facilities Feasibility Study, prepared by on behalf of District, prepared by Kennedy/Jenks Consultants on behalf of District
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Interim Remedial Action Plan	5/9/2020	5/9/2020	Interim Remedial Action Plan for the South Y PCE Facilities Feasibility Study, prepared by Desert Research Institute on behalf of District
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	4/29/2020	4/29/2020	Acknowledgement of Submittal - April 28, 2020 Supplemental Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS) and April 16, 2020 Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS)
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	4/28/2020	4/28/2020	Seven Springs Limited Partnership and Fox Capital Management Corporation - Supplemental Comments on Kennedy Jenks Consultants Inc. Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study (FS)
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Other Workplan	4/16/2020	4/16/2020	Final Well Decommissioning WP, Lukins Brothers Water Co., WSW #4
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	4/16/2020	4/16/2020	PES Environmental Inc - Comments on Kennedy Jenks Consultants Inc.'s Draft Interim Remedial Action Plan (IRAP) and South Y PCE Facilities Feasibility Study

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	3/25/2020	3/25/2020	Notice of Availability - Draft Interim Remedial Action Plan prepared for South Y Feasibility Study Public webinar scheduled for March 31, 2020
	<i>Other Regulatory Actions</i>	Meeting	3/6/2020	3/6/2020	Prop 1 Feasibility Study TAC meeting
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	2/27/2020	2/27/2020	South Y PCE Technical Working Group Meeting
	<i>Other Regulatory Actions</i>	Meeting	1/28/2020	1/28/2020	Face to face meeting with TKPOA to discuss regional plume characterization status, next steps, and current interpretation.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	12/17/2019	12/17/2019	Teleconference with Prop 1 Feasibility Study TAC.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	Well Sampling Results for 1995 12th Street
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	Well Sampling Results for 675 Emerald Bay Road
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	Well Sampling Results for Tahoe Valley Elementary School, 943 Tahoe Island Drive
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	WELL SAMPLING RESULTS FOR 575 ELOISE AVENUE
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	Well Sampling Results for 608 Emerald Bay Road
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	Well Sampling Results for 661 Emerald Bay Road
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	Well Sampling Results for 621 Eloise Avenue
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	11/18/2019	11/18/2019	Well Sampling Results for 609 Eloise Avenue
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	10/31/2019	10/31/2019	Email from Jen Lukins indicating that they just received their GAC Funding.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	10/21/2019	10/21/2019	South Y Alternatives Review call
	<i>Other Regulatory Actions</i>	Meeting	9/12/2019	9/12/2019	South Y PCE Technical Meeting
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	9/5/2019	9/5/2019	Email to Interested Parties - August 22, 2019 Memorandum
[VIEW DOCS]	<i>Response Requested - Reports</i>	Feasibility Study Report	9/5/2019	9/5/2019	Fate and Transport Modeling of the South Y PCE Groundwater Contamination Plume - Addendum, prepared by Desert Research Institute on behalf of District
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/29/2019	8/29/2019	Minutes for South Y PCE Technical Meeting-May 13, 2019

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/27/2019	8/27/2019	Silver State Analytical Laboratories, Analytical Laboratory Report for Sampling at LBWC #1 on August 27, 2019 by Lukins Brothers Water Company
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/27/2019	8/27/2019	Silver State Analytical Laboratories, Analytical Laboratory Report for Private Well Sampling at LBWC #1 and Private Well at 609 Eloise Avenue by Lukins Brother Water Company
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	8/22/2019	8/22/2019	SUMMARY OF 13267 SITE HISTORY QUESTIONNAIRES AS OF JULY 26, 2019
[VIEW DOCS]	<i>Response Requested - Reports</i>	Feasibility Study Report	7/31/2019	7/31/2019	Pre-Design Investigation Report for Remedial Alternatives to Mitigate Tetrachloroethylene Contamination, prepared by Kennedy/Jenks Consultants on behalf of District
[VIEW DOCS]	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	7/3/2019	7/3/2019	Site Cleanup Subaccount Program (SCAP) - South Lake Tahoe Y PCE Plume - Regional Plume Characterization Work Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	6/26/2019	6/26/2019	PCE Public Meeting - hosted by Prop 1 grantees
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	6/25/2019	6/25/2019	Table Summarizing PCE Sampling Results in Tahoe Keys Water Company Supply Wells from 1989 - 20019
	<i>Other Regulatory Actions</i>	Meeting	6/21/2019	6/21/2019	South Y Feasibility Study of Remedial Alternatives TAC Meeting 5
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	6/17/2019	6/17/2019	Site Cleanup Subaccount Program (SCAP) - South "Y" PCE Regional Plume Characterization Project Updates
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence - #6/7/2019	6/7/2019	6/7/2019	PCE Technical Meeting email follow-up.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	5/14/2019	5/14/2019	Email update to interested parties re Investigative Orders/May 13, 2019 South Y PCE Technical Meeting Presentations
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/13/2019	5/13/2019	South Y PCE Technical Meeting

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Enforcement/Orders</i>	13267 Requirement	4/3/2019	4/3/2019	Investigative Board Orders - Requiring the Submittal of a Completed Site History Questionnaire
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	3/20/2019	3/20/2019	email from STPUD (Thomsen) re South Lake Tahoe PCE Groundwater Contamination Update
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	3/6/2019	3/6/2019	PCE Public Meeting - hosted by Prop 1 grantees
	<i>Other Regulatory Actions</i>	Meeting	3/5/2019	3/5/2019	Water Purveyors/Lahontan executive monthly meeting
	<i>Other Regulatory Actions</i>	Meeting	2/26/2019	2/26/2019	South Y Feasibility Study of Remedial Alternatives TAC Meeting 4
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/22/2019	2/22/2019	Email from STPUD to media partners transmitting press release and area map associated with March 6, 2019 public meeting
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/22/2019	2/22/2019	Email from STPUD transmitting agenda for March 5, 2019 Water Purveyors and Lahontan Water Board meeting
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/22/2019	2/22/2019	Email from STPUD announcing March 6, 2019 Public Meeting on PCE Groundwater contamination at South Tahoe Y
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/21/2019	2/21/2019	Email from STPUD (Bergsohn) transmitting TAC #4 agenda and meeting materials
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	2/19/2019	2/19/2019	Email from STPUD to David Jinkens re South Y PCE Groundwater Contamination Update
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Email Correspondence	1/28/2019	1/28/2019	South Lake Tahoe PCE Groundwater Contamination Update from STPUD
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	12/21/2018	12/21/2018	Stakeholder Advisory Group meeting for the Tahoe Valley South Groundwater Management Plan
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Staff Letter	12/14/2018	12/14/2018	Letter to Property Owners with Potential Wells Requesting Information and Permission to Sample
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	11/16/2018	11/16/2018	Email transmitting D1712508 TAC Project Meeting 3; Agenda with Meeting Notes

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Enforcement/Orders</i>	Deadline Extension	11/8/2018	11/8/2018	Distribution System Operations and Maintenance Plan and Emergency Response Plan Deadline Extension letters sent to South Tahoe Public Utility District, Tahoe Keys Water Company, and Lukins Brothers Water Company. Deadline extended to December 31, 2018.
	<i>Other Regulatory Actions</i>	Meeting	11/7/2018	11/7/2018	PCE Public Meeting - hosted by Prop 1 grantees
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	10/23/2018	10/23/2018	South Y Feasibility Study of Remedial Alternatives TAC Meeting 3
	<i>Other Regulatory Actions</i>	Verbal Communication	10/9/2018	10/9/2018	Telephone conversation with Steve Brennan of LTUSD. Confirmed well is not being used and that there are no plans to use the Tahoe Valley Elementary well for irrigation purposes and the district will be proceeding with well abandonment in the future.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	10/8/2018	10/8/2018	Meeting with water purveyors (Lukins Brothers Water Company, TKWC, and STPUD) and Lahontan Board staff to discuss funding status and path forward.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	9/25/2018	9/25/2018	South Lake Tahoe PCE Groundwater Contamination update email from Shelley Thomsen of STPUD
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/14/2018	9/14/2018	Letter from Division of Drinking Water re: South Tahoe Public Utility District Public Water System (PWS NO. 0910002) Distribution System Operations and Maintenance Plan and Emergency Response Plan
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/14/2018	9/14/2018	Letter from Division of Drinking Water re: Tahoe Keys Water Company Public Water System (PWS NO. 0910015) Distribution System Operations and Maintenance Plan and Emergency Response Plan

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/14/2018	9/14/2018	Letter from Division of Drinking Water re: Lukins Brothers Water Company Public Water System (PWS NO. 0910007) Distribution System Operations and Maintenance Plan and Emergency Response Plan
	<i>Other Regulatory Actions</i>	Meeting	8/8/2018	8/8/2018	PCE Public Meeting - hosted by Prop 1 grantees
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Meeting	5/9/2018	5/9/2018	Meeting with Lukins, TKPOA, STPUD, and City of SLT to discuss draft SB445 scope of work
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Pilot Study / Treatability Workplan	3/23/2018	3/23/2018	South Y Pre-Design Investigation Workplan (Agreement D1712508), prepared by Kennedy/Jenks Consultants on behalf of District
	<i>Other Regulatory Actions</i>	Meeting	2/7/2018	2/7/2018	PCE Public Meeting - hosted by Prop 1 grantees
	<i>Other Regulatory Actions</i>	Meeting	7/21/2017	7/21/2017	Meeting with Lukins Bros Water Company to discuss next PCE investigation.
	<i>Other Regulatory Actions</i>	Meeting	6/29/2017	6/29/2017	Water Board staff meeting with water purveyors to explain final CAO for Lake Tahoe Laundry Works.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	6/25/2017	6/25/2017	Collected groundwater samples from South Y monitoring wells.
	<i>Other Regulatory Actions</i>	Meeting	4/5/2017	4/5/2017	Attend the Tahoe Valley SGMA meeting to discuss the on-going development of the groundwater model.
[VIEW DOCS]	<i>Response Requested - Other</i>	Email Correspondence	3/15/2017	3/15/2017	Email string between DFA and Water Board regarding Prop 1 Pre Design/Feasibility Study MOU
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	12/21/2016	12/21/2016	PCE MONITORING WELL DATA, TAHOE SOUTH Y, FALL 2016 Letter contains PCE groundwater results from monitoring well sampling on the north side of the Tahoe South Y intersection, conducted by Water Board staff in fall 2016

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
	<i>Other Regulatory Actions</i>	Meeting	10/25/2016	10/25/2016	GWMP Stakeholder Advisory Group Provided verbal update on the status of the proposed cleanup and abatement order for the Lake Tahoe Laundry Work site and the supplemental PCE groundwater investigation planned for spring 2017.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Verbal Communication	9/2/2016	9/2/2016	Staff Memo on Next Steps for South Y PCE Investigation Memo provides an outline of tasks to be completed in collaboration with local water purveyors for PCE investigation
	<i>Other Regulatory Actions</i>	Meeting	8/30/2016	8/30/2016	Meeting with water purveyors to discuss next steps for supplemental PCE investigation
[VIEW DOCS]	<i>Response Requested - Reports</i>	Technical Memos	8/15/2016	8/15/2006	Technical Memorandum Results of PCE Investigation for Tahoe Keys Property Owner Association (TKPOA), South Y Area, prepared by GEI Consultants
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/29/2016	7/29/2016	TKPOA Findings of the South Y PCE Investigation Reviewed draft document and provided comments to TKPOA and consultant
[VIEW DOCS]	<i>Response Requested - Reports</i>	Pilot Study/ Treatability Report	6/29/2016	6/29/2016	South Y Extraction Well Suitability Investigation, prepared by GEI Consultants on behalf of District
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/15/2016	6/15/2016	STPUD's Extraction Well Suitability for PCE Contamination Removal Reviewed draft document and provided comments back to STPUD and consultant
	<i>Other Regulatory Actions</i>	Meeting	2/5/2016	2/5/2016	Public meeting to explain the results of the PCE investigation report and the Water Board's next steps.
[VIEW DOCS]	<i>Notices</i>	Notice of Public Hearing / Board Action	1/20/2016	1/20/2016	Public Meeting Announcement Letter announces a Feb. 5 public meeting to discuss the Jan. 19, 2016 PCE Investigation Report.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/19/2016	1/19/2016	Final PCE Investigation Report Report describes the sampling and results of a PCE investigation conducted in the west side of South Lake Tahoe in fall 2015. Up to 3 ppb PCE was detected in samples from shallow hydropunch borings and up to 150 ppb were detected in monitoring well samples. No PCE sources were identified in the investigation.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	10/26/2015	10/26/2015	Start of PCE groundwater sampling
[VIEW DOCS]	<i>Response Requested - Workplans</i>	Preliminary Site Assessment Workplan	10/8/2015	10/8/2015	Lukins Service Area Pce Investigation Work Plan
	<i>Response Requested - Workplans</i>	Site Investigation Workplan - Regulator Responded	10/8/2015	10/8/2015	Workplan proposing a PCE groundwater investigation in the western area of South Lake Tahoe using direct push temporary borings.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/5/2015	6/5/2015	Form 22--Transfer Request for Project Funds to DGS Letter from Executive Officer submits a Form 22 and requests transfer of CAA funds to Dept of General Service for contracting a PCE groundwater investigation.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/17/2015	4/17/2015	Approval of CAA Funds Letter from the SWRCB approves the revised amount of \$125,00 of Cleanup and Abatement Account funds for a PCE groundwater investigation.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	2/12/2015	2/12/2015	Letter Water Analysis for Schneewis Property,903 Eloise Avenue, Sampled on January 27, 2015
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	1/30/2015	1/30/2015	Letter PCE in Domestic Well at 883 Eloise Avenue, Sampled on September 11, 2014
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/27/2015	1/27/2015	Request for Revised Cleanup and Abatement Account Funding Letter from Executive Officer requests a revised amount of \$125,000 from the Cleanup and Abatement Account for conducting a PCE investigation.

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/1/2014	12/1/2014	PCE results in Lukins Wells 2 & 5 Laboratory results from 11/19/2014 shows PCE detected at 27 ppb in Well 2 and 53 ppb in Well 5.
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/9/2014	10/9/2014	Request for Cleanup and Abatement Account Funding Letter from Executive Officer requests \$69,000 of Cleanup and Abatement Account funding to conduct a PCE groundwater investigation.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	9/18/2014	9/18/2014	Water Analysis for Rockwater Apartment/Restaurant Letter informs private well owner of water results showing PCE up to 280 ppb.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	9/18/2014	9/18/2014	Water Analysis Results for 609 Eloise Avenue Lab results show no detectable levels of VOCs in well sample.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	9/9/2014	9/9/2014	Water Analysis for 661 Emerald Bay Road Well Lab results show no detectable levels of VOCs on well sample.
[VIEW DOCS]	<i>Notices</i>	Letter - Notice	9/9/2014	9/9/2014	Water Analysis for 705 Eloise Avenue Well Lab results show no detectable concentrations of VOC contaminants.
	<i>Other Regulatory Actions</i>	Site Visit / Inspection / Sampling	8/15/2014	8/15/2014	Water Board sampling of domestic wells in western South Lake Tahoe
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/13/2014	8/13/2014	Private well and monitoring well sampling results from 8/13/2014, 8/27/2014, and 9/11/2014
	<i>Other Regulatory Actions</i>	Verbal Communication	7/7/2014	7/7/2014	Confirmation of PCE detections in Lukins Wells 2 & 5 Call from Lukins Brothers Water Company stating that water samples collected on July 2, 2014 confirmed PCE detection of 22 ppb in Well 2 and 16 ppb in Well 5. Both wells are being shut down.
	<i>Leak Action</i>	Leak Reported	6/24/2014		
	<i>Enforcement - Other</i>	UNK			
	<i>Enforcement - Other</i>	UNK			

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION</u>
[VIEW DOCS]	<i>Notices</i>	Letter - Notice			FINAL PROJECT REPORT AND DELIVERABLES COMPLETION LETTER re FEASIBILITY STUDY OF REMEDIAL ALTERNATIVES TO MITIGATE TETRACHLOROETHYLENE CONTAMINATION

B. Environmental Data (ESI)**1. Individual Well Analytical Data**

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
CPT-A01	Borehole					CPT-A01
CPT-A02	Borehole					CPT-A02
CPT-A03	Borehole					CPT-A03
CPT-A04	Borehole					CPT-A04
CPT-A05	Borehole					CPT-A05
CPT-A06	Borehole					CPT-A06
CPT-B01	Borehole					CPT-B01
CPT-B02	Borehole					CPT-B02
CPT-B03	Borehole					CPT-B03
CPT-B04	Borehole					CPT-B04
CPT-B05	Borehole					CPT-B05
CPT-B07	Borehole					CPT-B07
CPT-C03	Borehole					CPT-C03
CPT-C04	Borehole					CPT-C04
CPT-C05	Borehole					CPT-C05
CPT-C06	Borehole					CPT-C06
CPT-D01	Borehole					CPT-D01
CPT-D02	Borehole					CPT-D02
CPT-D03	Borehole					CPT-D03
CPT-D04	Borehole					CPT-D04
CPT-D05	Borehole					CPT-D05
CPT-D06	Borehole					CPT-D06
CPT-D07	Borehole					CPT-D07
CPT-E01	Borehole					CPT-E01
CPT-E02	Borehole					CPT-E02
CPT-E03	Borehole					CPT-E03
CPT-E04	Borehole					CPT-E04
CPT-E05	Borehole					CPT-E05
CPT-E06	Borehole					CPT-E06
CPT-E07	Borehole					CPT-E07
CPT-E08	Borehole					CPT-E08
CPT-E10	Borehole					CPT-E10
CPT-F01	Borehole					CPT-F01
CPT-F03	Borehole					CPT-F03
CPT-F04	Borehole					CPT-F04
CPT-F05	Borehole					CPT-F05
CPT-F07	Borehole					CPT-F07
CPT-F08	Borehole					CPT-F08
CPT-F09	Borehole					CPT-F09
CPT-F10	Borehole					CPT-F10
CPT-F11	Borehole					CPT-F11
CPT-F12	Borehole					CPT-F12
CPT-G01	Borehole					CPT-G01
CPT-G05	Borehole					CPT-G05
CPT-G06	Borehole					CPT-G06
CPT-G07	Borehole					CPT-G07
CPT-G08	Borehole					CPT-G08
CPT-G09	Borehole					CPT-G09
CPT-G10	Borehole					CPT-G10
CPT-G11	Borehole					CPT-G11
CPT-H01	Borehole					CPT-H01
CPT-H02	Borehole					CPT-H02
CPT-H03	Borehole					CPT-H03
CPT-H04	Borehole					CPT-H04
CPT-H05	Borehole					CPT-H05
CPT-I01	Borehole					CPT-I01
CPT-I02	Borehole					CPT-I02
SONIC01	Borehole					SONIC01
SONIC02	Borehole					SONIC02

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
SONIC03	Borehole					SONIC03
SONIC04	Borehole					SONIC04
SONIC05	Borehole					SONIC05 - See SONIC5A Redrill for depths 148' and 168'
SONIC06	Borehole					SONIC06
SONIC07	Borehole					SONIC07
SONIC08	Borehole					SONIC08
SONIC09	Borehole					SONIC09
SONIC10	Borehole					SONIC10
SONIC11	Borehole					SONIC11
SONIC12	Borehole					SONIC12
SONIC13	Borehole					SONIC13
SONIC14	Borehole					SONIC14
SONIC15	Borehole					SONIC15
SONIC16	Borehole					SONIC16
SONIC17	Borehole					SONIC17
SONIC18	Borehole					SONIC18
SONIC19	Borehole					SONIC19
SONIC19A	Borehole					SONIC19A
SONIC20	Borehole					SONIC20
SONIC21	Borehole					SONIC21
SONIC22	Borehole					SONIC22
SONIC5A	Borehole					SONIC05A - Redrill of SONIC05 for depths 148' and 168'
199TWE	Domestic/Private Drinking Water Well					199TWE
575ELO	Domestic/Private Drinking Water Well					575ELO
608EME	Domestic/Private Drinking Water Well					608EME
609ELO	Domestic/Private Drinking Water Well					609ELO
621ELO	Domestic/Private Drinking Water Well					621ELO
661EME	Domestic/Private Drinking Water Well					661EME
675EME	Domestic/Private Drinking Water Well					675EME
943TAH	Domestic/Private Drinking Water Well					943TAH
EQUIPBLANK	QCBE					Equipment Blank
TRIPBLANK	QCTB					TRIPBLANK
LBWC1-SW-1	Remediation/Groundwater Monitoring Well	80.00	80.00	100 feet	15 feet	
LBWC1-SW-2	Remediation/Groundwater Monitoring Well	125.00	125.00	133 feet	21 feet	
LBWC1-SW-3	Remediation/Groundwater Monitoring Well	19.00	19.00	160 feet	10 feet	
LBWC5-SW-1	Remediation/Groundwater Monitoring Well	61.00	61.00	70 feet	15 feet	
LBWC5-SW-2	Remediation/Groundwater Monitoring Well	8.00	8.00	140 feet	20 feet	
TKWC1-SW-1	Remediation/Groundwater Monitoring Well	104.00	104.00	107 feet	20 feet	

<u>FIELD POINT NAME</u>	<u>FIELD POINT CLASS</u>	<u>MIN DEPTH TO WATER</u>	<u>MAX DEPTH TO WATER</u>	<u>DEPTH - TOP OF CASING TO WELL SCREEN</u>	<u>LENGTH OF WELL SCREEN</u>	<u>FIELD POINT DESCRIPTION</u>
TKWC1-SW-2	Remediation/Groundwater Monitoring Well	12.50	12.50	149 feet	20 feet	
TKWC2-SW-1	Remediation/Groundwater Monitoring Well	124.00	124.00	137 feet	20 feet	
TKWC2-SW-2	Remediation/Groundwater Monitoring Well	188.00	188.00	167 feet	20 feet	
HYDRANT	Water Supply Well					SONIC19 Hydrant 01

2. Laboratory Analytical Reports (EDF)

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>	<u>SUBMIT DATE</u>
CPT PHASE1 SDG314336	Q1 2001	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311387	Q2 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311338	Q2 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311358	Q2 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
SONIC01 SDG311180	Q2 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC02 SDG311359	Q2 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG311497	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311632	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311686	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311696	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311696	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311759	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311837	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311898	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311950	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG311981	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312012	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312072	Q3 2019	ED TARTER	8/27/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312129	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312210	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312336	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312378	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312406	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG 312472	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312473	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG 312605	Q3 2019	ED TARTER	8/29/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312627	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312674	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312727	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312820	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312874	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312904	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312944	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG313057	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG312244	Q3 2019	ED TARTER	8/30/2019	VIEW NARRATIVE DATA
SONIC03 SDG311496	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC HYDRANT SDG311590	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC03 SDG311591	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC03 SDG311685	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC04 SDG311773	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC04 SDG311897	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC04 SDG311949	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC06 SDG312011	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC06 SDG312071	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC06 SDG312131	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC05 SDG312337	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC05 SDG312407	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC07 SDG312673	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC09 SDG312873	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC09 SDG312943	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
SONIC09 SDG313056	Q3 2019	ED TARTER	9/3/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313116	Q3 2019	ED TARTER	9/9/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG 313236	Q3 2019	ED TARTER	9/9/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG 313218	Q3 2019	ED TARTER	9/9/2019*	VIEW NARRATIVE DATA

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>	<u>SUBMIT DATE</u>
SONIC5A SDG313115	Q3 2019	ED TARTER	9/9/2019*	VIEW NARRATIVE DATA
SONIC08 SDG 313219	Q3 2019	ED TARTER	9/9/2019*	VIEW NARRATIVE DATA
SONIC11 SDG313826	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
SONIC10 SDG313645	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
SONIC10 SDG313522	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
SONIC08 SDG313417	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
SONIC08 SDG 313374	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG133375	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313416	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313465	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313646	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313648	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313643	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313723	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313825	Q3 2019	ED TARTER	9/16/2019*	VIEW NARRATIVE DATA
CPT PHASE1 SDG313724	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG 313872	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG313873	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG313828	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG313933	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG313935	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG313969	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314057	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314106	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314157	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314277	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314286	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314336	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314388	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314409	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314490	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
SONIC11 SDG313874	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
SONIC12 SDG314056	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
SONIC12 SDG314108	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
SONIC12 SDG314108	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
SONIC13 SDG314337	Q3 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314546	Q4 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314547	Q4 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314594	Q4 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314653	Q4 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
CPT PHASE1 SDG314738	Q4 2019	ED TARTER	10/30/2019	VIEW NARRATIVE DATA
TASK5 SDG315253	Q4 2019	ED TARTER	11/19/2019	VIEW NARRATIVE DATA
CPT PHASE2 SDG20G191	Q3 2020	ED TARTER	10/2/2020	
CPT PHASE2 SDG20G236	Q3 2020	ED TARTER	10/2/2020	
CPT PHASE2 SDG20G319	Q3 2020	ED TARTER	10/2/2020	
CPT PHASE2 SDG20H003	Q3 2020	ED TARTER	10/2/2020	
CPT PHASE2 SDG20H004	Q3 2020	ED TARTER	10/2/2020	
CPT PHASE2 SDG20H058	Q3 2020	ED TARTER	10/2/2020	
CPT PHASE2 SDG20G192	Q3 2020	ED TARTER	10/6/2020	
SONIC20 SDG20G235	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20G318	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20H002	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20G190	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20H057	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20H059	Q3 2020	ED TARTER	10/12/2020	

<u>TITLE</u>	<u>QUARTER</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>	<u>SUBMIT DATE</u>
SONIC20 SDG20H078	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20H133	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20H158	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20H196	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20H240	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20G287	Q3 2020	ED TARTER	10/12/2020	
SONIC20 SDG20I045	Q3 2020	ED TARTER	10/12/2020	
SEMI-ANNUAL SENTRY WELL GROUNDWATER MONITORING REPORT, EVENT...	Q4 2021	ED TARTER	5/25/2022	
SENTRY GROUNDWATER 2Q22 SOUTH Y PLUME SDG 22D284...	Q2 2022	ED TARTER	6/8/2022	

3. Well Latitude / Longitude Data (GEO_XY)

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
2019 CPT AND SONIC LOCATIONS	ED TARTER	11/26/2019
2020 CPT LOCATIONS	ED TARTER	12/17/2020*
2020 SONIC LOCATIONS	ED TARTER	12/17/2020*
SENTRY WELL GEO_XY	ED TARTER	1/27/2022

4. Well Survey Data (GEO_Z)

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
SENTRY WELL GEO_Z	ED TARTER	1/27/2022

5. Well Depth to Water Data (GEO_Well)

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMIT DATE</u>
2021 SENTRY WELL INSTALLATION CONSTRUCTION DETAILS...	ED TARTER	1/25/2022

C. Site Map / Documents

1. Site Maps (GEO_MAP), Boring Logs (GEO_BORE) and KML / KMZ Files

<u>TITLE</u>	<u>SUBMITTED BY</u>	<u>SUBMITTED</u>	<u>SIZE</u>
CPT A01 BORING LOG (CPT-A01)	ED TARTER (AUTH_RP)	12/13/2019	348 KB
CPT A02 BORING LOG (CPT-A02)	ED TARTER (AUTH_RP)	12/13/2019	332 KB
CPT A03 BORING LOG (CPT-A03)	ED TARTER (AUTH_RP)	12/13/2019	245 KB
CPT A04 BORING LOG (CPT-A04)	ED TARTER (AUTH_RP)	12/13/2019	390 KB
CPT A05 BORING LOG (CPT-A05)	ED TARTER (AUTH_RP)	12/13/2019	289 KB
CPT A06 BORING LOG (CPT-A06)	ED TARTER (AUTH_RP)	12/13/2019	387 KB
CPT B01 BORING LOG (CPT-B01)	ED TARTER (AUTH_RP)	12/13/2019	304 KB
CPT B02 BORING LOG (CPT-B02)	ED TARTER (AUTH_RP)	12/13/2019	299 KB
CPT B03 BORING LOG (CPT-B03)	ED TARTER (AUTH_RP)	12/13/2019	303 KB
CPT B04 BORING LOG (CPT-B04)	ED TARTER (AUTH_RP)	12/13/2019	370 KB
CPT B05 BORING LOG (CPT-B05)	ED TARTER (AUTH_RP)	12/13/2019	287 KB
CPT B07 BORING LOG (CPT-B07)	ED TARTER (AUTH_RP)	12/13/2019	317 KB
CPT C03 BORING LOG (CPT-C03)	ED TARTER (AUTH_RP)	12/13/2019	273 KB
CPT C04 BORING LOG (CPT-C04)	ED TARTER (AUTH_RP)	12/13/2019	214 KB
CPT C05 BORING LOG (CPT-C05)	ED TARTER (AUTH_RP)	12/13/2019	273 KB
CPT C06 BORING LOG (CPT-C06)	ED TARTER (AUTH_RP)	12/13/2019	254 KB
CPT D01 BORING LOG (CPT-D01)	ED TARTER (AUTH_RP)	12/13/2019	283 KB
CPT D02 BORING LOG (CPT-D02)	ED TARTER (AUTH_RP)	12/13/2019	493 KB
CPT D03 BORING LOG (CPT-D03)	ED TARTER (AUTH_RP)	12/13/2019	283 KB
CPT D04 BORING LOG (CPT-D04)	ED TARTER (AUTH_RP)	12/13/2019	267 KB
CPT D05 BORING LOG (CPT-D05)	ED TARTER (AUTH_RP)	12/13/2019	274 KB
CPT D06 BORING LOG (CPT-D06)	ED TARTER (AUTH_RP)	12/13/2019	305 KB
CPT D07 BORING LOG (CPT-D07)	ED TARTER (AUTH_RP)	12/13/2019	292 KB
CPT E01 BORING LOG (CPT-E01)	ED TARTER (AUTH_RP)	12/13/2019	299 KB
CPT E02 BORING LOG (CPT-E02)	ED TARTER (AUTH_RP)	12/13/2019	273 KB
CPT E03 BORING LOG (CPT-E03)	ED TARTER (AUTH_RP)	12/13/2019	252 KB
CPT E04 BORING LOG (CPT-E04)	ED TARTER (AUTH_RP)	12/13/2019	280 KB
CPT E05 BORING LOG (CPT-E05)	ED TARTER (AUTH_RP)	12/13/2019	277 KB
CPT E06 BORING LOG (CPT-E06)	ED TARTER (AUTH_RP)	12/13/2019	294 KB
CPT E07 BORING LOG (CPT-E07)	ED TARTER (AUTH_RP)	12/13/2019	308 KB
CPT E08 BORING LOG (CPT-E08)	ED TARTER (AUTH_RP)	12/13/2019	307 KB
CPT E10 BORING LOG (CPT-E10)	ED TARTER (AUTH_RP)	12/13/2019	317 KB
CPT F01 BORING LOG (CPT-F01)	ED TARTER (AUTH_RP)	12/13/2019	273 KB
CPT F03 BORING LOG (CPT-F03)	ED TARTER (AUTH_RP)	12/13/2019	275 KB
CPT F04 BORING LOG (CPT-F04)	ED TARTER (AUTH_RP)	12/13/2019	274 KB
CPT F05 BORING LOG (CPT-F05)	ED TARTER (AUTH_RP)	12/13/2019	277 KB
CPT F07 BORING LOG (CPT-F07)	ED TARTER (AUTH_RP)	12/13/2019	281 KB
CPT F08 BORING LOG (CPT-F08)	ED TARTER (AUTH_RP)	12/13/2019	299 KB

CPT F09 BORING LOG (CPT-F09)	ED TARTER (AUTH_RP)	12/13/2019	313 KB
CPT F10 BORING LOG (CPT-F10)	ED TARTER (AUTH_RP)	12/13/2019	321 KB
CPT G01 BORING LOG (CPT-G01)	ED TARTER (AUTH_RP)	12/13/2019	277 KB
CPT G05 BORING LOG (CPT-G05)	ED TARTER (AUTH_RP)	12/13/2019	272 KB
CPT G06 BORING LOG (CPT-G06)	ED TARTER (AUTH_RP)	12/13/2019	293 KB
CPT G07 BORING LOG (CPT-G07)	ED TARTER (AUTH_RP)	12/13/2019	257 KB
CPT G08 BORING LOG (CPT-G08)	ED TARTER (AUTH_RP)	1/14/2021*	205 KB
CPT H01 BORING LOG (CPT-H01)	ED TARTER (AUTH_RP)	12/13/2019	256 KB
CPT H02 BORING LOG (CPT-H02)	ED TARTER (AUTH_RP)	12/13/2019	280 KB
CPT H03 BORING LOG (CPT-H03)	ED TARTER (AUTH_RP)	12/13/2019	259 KB
CPT H04 BORING LOG (CPT-H04)	ED TARTER (AUTH_RP)	12/13/2019	251 KB
CPT H05 BORING LOG (CPT-H05)	ED TARTER (AUTH_RP)	12/13/2019	263 KB
CPT I01 BORING LOG (CPT-I01)	ED TARTER (AUTH_RP)	12/13/2019	260 KB
CPT I02 BORING LOG (CPT-I02)	ED TARTER (AUTH_RP)	12/13/2019	178 KB
CPT-F11 BORING LOG (CPT-F11)	ED TARTER (AUTH_RP)	12/17/2020*	227 KB
CPT-F12 BORING LOG (CPT-F12)	ED TARTER (AUTH_RP)	12/17/2020*	218 KB
CPT-G09 BORING LOG (CPT-G09)	ED TARTER (AUTH_RP)	12/17/2020*	203 KB
CPT-G10 BORING LOG (CPT-G10)	ED TARTER (AUTH_RP)	12/17/2020*	157 KB
CPT-G11 BORING LOG (CPT-G11)	ED TARTER (AUTH_RP)	12/17/2020*	169 KB
LBWC1-SW-1 BORING AND WELL CONSTRUCTION LOG (LBWC1-SW-1)	ED TARTER (AUTH_RP)	1/3/2022	424 KB
LBWC1-SW-2 BORING AND WELL CONSTRUCTION LOG (LBWC1-SW-2)	ED TARTER (AUTH_RP)	1/3/2022	451 KB
LBWC1-SW-3 BORING AND WELL CONSTRUCTION LOG (LBWC1-SW-3)	ED TARTER (AUTH_RP)	1/3/2022	645 KB
LBWC5-SW-1 BORING AND WELL CONSTRUCTION LOG (LBWC5-SW-1)	ED TARTER (AUTH_RP)	1/3/2022	410 KB
LBWC5-SW-2 BORING AND WELL CONSTRUCTION LOG (LBWC5-SW-2)	ED TARTER (AUTH_RP)	1/3/2022	723 KB
SONIC01 BORING LOG (SONIC01)	ED TARTER (AUTH_RP)	12/16/2019	283 KB
SONIC02 BORING LOG (SONIC02)	ED TARTER (AUTH_RP)	12/16/2019	288 KB
SONIC03 BORING LOG (SONIC03)	ED TARTER (AUTH_RP)	12/16/2019	262 KB
SONIC04 BORING LOG (SONIC04)	ED TARTER (AUTH_RP)	12/16/2019	232 KB
SONIC05 BORING LOG (SONIC05)	ED TARTER (AUTH_RP)	12/16/2019	272 KB
SONIC06 BORING LOG (SONIC06)	ED TARTER (AUTH_RP)	12/16/2019	261 KB
SONIC07 BORING LOG (SONIC07)	ED TARTER (AUTH_RP)	12/16/2019	280 KB
SONIC08 BORING LOG (SONIC08)	ED TARTER (AUTH_RP)	12/16/2019	271 KB
SONIC09 BORING LOG (SONIC09)	ED TARTER (AUTH_RP)	12/16/2019	269 KB
SONIC10 BORING LOG (SONIC10)	ED TARTER (AUTH_RP)	12/16/2019	268 KB
SONIC11 BORING LOG (SONIC11)	ED TARTER (AUTH_RP)	12/16/2019	199 KB
SONIC12 BORING LOG (SONIC12)	ED TARTER (AUTH_RP)	12/16/2019	267 KB

SONIC13 BORING LOG (SONIC13)	ED TARTER (AUTH_RP)	12/16/2019	218 KB
SONIC14 BORING LOG (SONIC14)	ED TARTER (AUTH_RP)	12/15/2020*	253 KB
SONIC15 BORING LOG (SONIC15)	ED TARTER (AUTH_RP)	12/15/2020*	209 KB
SONIC16 BORING LOG (SONIC16)	ED TARTER (AUTH_RP)	12/15/2020*	205 KB
SONIC17 BORING LOG (SONIC17)	ED TARTER (AUTH_RP)	12/15/2020*	201 KB
SONIC18 BORING LOG (SONIC18)	ED TARTER (AUTH_RP)	12/15/2020*	244 KB
SONIC19A BORING LOG (SONIC19A)	ED TARTER (AUTH_RP)	1/8/2021*	175 KB
SONIC20 BORING LOG (SONIC20)	ED TARTER (AUTH_RP)	12/15/2020*	202 KB
SONIC21 BORING LOG (SONIC21)	ED TARTER (AUTH_RP)	12/15/2020*	207 KB
SONIC22 BORING LOG (SONIC22)	ED TARTER (AUTH_RP)	12/15/2020*	207 KB
SONIC5A BORINGLOG (SONIC5A)	ED TARTER (AUTH_RP)	12/16/2019	165 KB
TKWC1-SW-1 BORING AND WELL CONSTRUCTION LOG (TKWC1-SW-1)	ED TARTER (AUTH_RP)	1/3/2022	435 KB
TKWC1-SW-2 BORING AND WELL CONSTRUCTION LOG (TKWC1-SW-2)	ED TARTER (AUTH_RP)	1/3/2022	691 KB
TKWC2-SW-1 BORING AND WELL CONSTRUCTION LOG (TKWC2-SW-1)	ED TARTER (AUTH_RP)	1/3/2022	446 KB
TKWC2-SW-2 BORING AND WELL CONSTRUCTION LOG (TKWC2-SW-2)	ED TARTER (AUTH_RP)	1/3/2022	722 KB

2. Site Documents

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>ACKNOWLEDGEMENT OF SUBMITTAL - APRIL 28, 2020 SUPPLEMENTAL COMMENTS ON KENNEDY JENKS CONSULTANTS INC.'S DRAFT INTERIM REMEDIAL ACTION PLAN (IRAP) AND SOUTH Y PCE FACILITIES FEASIBILITY STUDY (FS) AND APRIL 16, 2020 COMMENTS ON KENNEDY JENKS CONSULTANTS INC.'S DRAFT INTERIM REMEDIAL ACTION PLAN (IRAP) AND SOUTH Y PCE FACILITIES FEASIBILITY STUDY (FS)</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/29/2020	
<u>APPROVAL OF CAA FUNDS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	4/17/2015	
<u>AUGUST 21, 2020 SCAP UPDATE TO INTERESTED PARTIES</u>	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	8/21/2020	
<u>DISTRIBUTION SYSTEM OPERATIONS AND MAINTENANCE PLAN AND EMERGENCY RESPONSE PLAN DEADLINE EXTENSION LETTERS SENT TO SOUTH TAHOE PUBLIC UTILITY DISTRICT, TAHOE KEYS WATER COMPANY, AND LUKINS BROTHERS WATER COMPANY. DEADLINE EXTENDED TO DECEMBER 31, 2018.</u>	DEADLINE EXTENSION	BRIAN GREY (REGULATOR)	11/8/2018	
<u>EMAIL FROM DISTRICT PROVIDE ANALYTICAL DATABASE FOR SOUTH Y WELLS</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	7/27/2020	
<u>EMAIL FROM JEN LUKINS INDICATING THAT THEY JUST RECEIVED THEIR GAC FUNDING.</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	10/31/2019	
<u>EMAIL FROM LUKINS BROTHERS WATER COMPANY SUMMARIZING PCE DETECTIONS IN LBWC #5</u>	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	7/27/2020	
<u>EMAIL FROM STPUD (BERGSOHN) TRANSMITTING TAC #4 AGENDA AND MEETING MATERIALS</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/21/2019	
<u>EMAIL FROM STPUD ANNOUNCING MARCH 6, 2019 PUBLIC MEETING ON PCE GROUNDWATER CONTAMINATION AT SOUTH TAHOE Y</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/22/2019	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>EMAIL FROM STPUD TO DAVID JINKENS RE SOUTH Y PCE GROUNDWATER CONTAMINATION UPDATE</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/19/2019	
<u>EMAIL FROM STPUD TO MEDIA PARTNERS TRANSMITTING PRESS RELEASE AND AREA MAP ASSOCIATED WITH MARCH 6, 2019 PUBLIC MEETING</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/22/2019	
<u>EMAIL FROM STPUD TRANSMITTING AGENDA FOR MARCH 5, 2019 WATER PURVEYORS AND LAHONTAN WATER BOARD MEETING</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	2/22/2019	
<u>EMAIL STRING BETWEEN DFA AND WATER BOARD REGARDING PROP 1 PRE DESIGN/FEASIBILITY STUDY MOU</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/15/2017	
<u>EMAIL TO INTERESTED PARTIES - AUGUST 22, 2019 MEMORANDUM</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/5/2019	
<u>EMAIL TRANSMITTING D1712508 TAC PROJECT MEETING 3; AGENDA WITH MEETING NOTES</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	11/16/2018	
<u>EMAIL UPDATE TO INTERESTED PARTIES RE INVESTIGATIVE ORDERS/MAY 13, 2019 SOUTH Y PCE TECHNICAL MEETING PRESENTATIONS</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	5/14/2019	
<u>FINAL PROJECT REPORT AND DELIVERABLES COMPLETION LETTER RE FEASIBILITY STUDY OF REMEDIAL ALTERNATIVES TO MITIGATE TETRACHLOROETHYLENE CONTAMINATION</u>	LETTER - NOTICE	BRIAN GREY (REGULATOR)		
<u>FINAL SLT SOUTH Y PCE PLUME AREA SOIL GAS WORK PLAN</u>	SOIL VAPOR INTRUSION INVESTIGATION WORKPLAN	ABBY CAZIER (REGULATOR)	10/5/2021	
<u>FATE AND TRANSPORT MODELING OF THE SOUTH Y PCE GROUNDWATER CONTAMINATION PLUME - ADDENDUM, PREPARED BY DESERT RESEARCH INSTITUTE ON BEHALF OF DISTRICT</u>	FEASIBILITY STUDY REPORT	ABBY CAZIER (REGULATOR)	9/5/2019	
<u>FINAL PCE INVESTIGATION REPORT</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	1/19/2016	
<u>FINAL WELL DECOMMISSIONING WP, LUKINS BROTHERS WATER CO., WSW #4</u>	OTHER WORKPLAN	ED TARTER (AUTH_RP)	4/13/2020	9,332 KB

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>FORM 22--TRANSFER REQUEST FOR PROJECT FUNDS TO DGS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	6/5/2015	
<u>INTERIM REMEDIAL ACTION PLAN FOR THE SOUTH Y PCE FACILITIES FEASIBILITY STUDY, PREPARED BY DESERT RESEARCH INSTITUTE ON BEHALF OF DISTRICT</u>	INTERIM REMEDIAL ACTION PLAN	ABBY CAZIER (REGULATOR)	5/9/2020	
<u>INVESTIGATIVE BOARD ORDERS - REQUIRING THE SUBMITTAL OF A COMPLETED SITE HISTORY QUESTIONNAIRE</u>	13267 REQUIREMENT	ABBY CAZIER (REGULATOR)	4/3/2019	
<u>JULY 13, 2020 SCAP UPDATE TO INTERESTED PARTIES</u>	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	7/13/2020	
<u>LETTER PCE IN DOMESTIC WELL AT 883 ELOISE AVENUE, SAMPLED ON SEPTEMBER 11, 2014</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	1/30/2015	
<u>LETTER WATER ANALYSIS FOR SCHNEEWIS PROPERTY, 903 ELOISE AVENUE, SAMPLED ON JANUARY 27, 2015</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	2/12/2015	
<u>LETTER FROM DIVISION OF DRINKING WATER RE: LUKINS BROTHERS WATER COMPANY PUBLIC WATER SYSTEM (PWS NO. 0910007) DISTRIBUTION SYSTEM OPERATIONS AND MAINTENANCE PLAN AND EMERGENCY RESPONSE PLAN</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	9/14/2018	
<u>LETTER FROM DIVISION OF DRINKING WATER RE: SOUTH TAHOE PUBLIC UTILITY DISTRICT PUBLIC WATER SYSTEM (PWS NO. 0910002) DISTRIBUTION SYSTEM OPERATIONS AND MAINTENANCE PLAN AND EMERGENCY RESPONSE PLAN</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	9/14/2018	
<u>LETTER FROM DIVISION OF DRINKING WATER RE: TAHOE KEYS WATER COMPANY PUBLIC WATER SYSTEM (PWS NO. 0910015) DISTRIBUTION SYSTEM OPERATIONS AND MAINTENANCE PLAN AND EMERGENCY RESPONSE PLAN</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	9/14/2018	
<u>LETTER TO PROPERTY OWNERS WITH POTENTIAL WELLS REQUESTING INFORMATION AND PERMISSION TO SAMPLE</u>	STAFF LETTER	ABBY CAZIER (REGULATOR)	12/14/2018	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>LUKINS SERVICE AREA PCE INVESTIGATION WORK PLAN - REGULATOR RESPONSE</u>	PRELIMINARY SITE ASSESSMENT WORKPLAN	LISA DERNBACH (REGULATOR)	10/8/2015	
<u>MARCH 25, 2021 SAG WORKSHOP MEETING MATERIALS (INCLUDE AECOM'S UPDATE ON THE SCAP REGIONAL PCE PLUME INVESTIGATION ACTIVITIES)</u>	MEETING	ABBY CAZIER (REGULATOR)	3/25/2021	
<u>MEETING WITH LUKINS, TKPOA, STPUD, AND CITY OF SLT TO DISCUSS DRAFT SB445 SCOPE OF WORK</u>	MEETING	BRIAN GREY (REGULATOR)	5/9/2018	
<u>MEETING WITH WATER PURVEYORS (LUKINS BROTHERS WATER COMPANY, TKWC, AND STPUD) AND LAHONTAN BOARD STAFF TO DISCUSS FUNDING STATUS AND PATH FORWARD.</u>	MEETING	BRIAN GREY (REGULATOR)	10/8/2018	
<u>MINUTES FOR SOUTH Y PCE TECHNICAL MEETING-MAY 13, 2019 - REGULATOR RESPONSE</u>	OTHER REPORT / DOCUMENT	JEFF BROOKS (REGULATOR)	8/29/2019	
<u>NOTICE OF AVAILABILITY - DRAFT INTERIM REMEDIAL ACTION PLAN PREPARED FOR SOUTH Y FEASIBILITY STUDY PUBLIC WEBINAR SCHEDULED FOR MARCH 31, 2020</u>	OTHER REPORT / DOCUMENT	BRIAN GREY (REGULATOR)	3/25/2020	
<u>PCE MONITORING WELL DATA, TAHOE SOUTH Y, FALL 2016</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	12/21/2016	
<u>PCE PUBLIC MEETING - HOSTED BY PROP 1 GRANTEEES</u>	MEETING	BRIAN GREY (REGULATOR)	6/26/2019	
<u>PCE PUBLIC MEETING - HOSTED BY PROP 1 GRANTEEES</u>	MEETING	BRIAN GREY (REGULATOR)	3/6/2019	
<u>PCE TECHNICAL MEETING EMAIL FOLLOW-UP.</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	6/7/2019	
<u>PCE RESULTS IN LUKINS WELLS 2 & 5</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	12/1/2014	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>PES ENVIRONMENTAL INC - COMMENTS ON KENNEDY JENKS CONSULTANTS INC.'S DRAFT INTERIM REMEDIAL ACTION PLAN (IRAP) AND SOUTH Y PCE FACILITIES FEASIBILITY STUDY</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/16/2020	
<u>PRE-DESIGN INVESTIGATION REPORT FOR REMEDIAL ALTERNATIVES TO MITIGATE TETRACHLOROETHYLENE CONTAMINATION, PREPARED BY KENNEDY/JENKS CONSULTANTS ON BEHALF OF DISTRICT</u>	FEASIBILITY STUDY REPORT	ABBY CAZIER (REGULATOR)	7/31/2019	
<u>PRIVATE WELL AND MONITORING WELL SAMPLING RESULTS FROM 8/13/2014, 8/27/2014, AND 9/11/2014</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	ABBY CAZIER (REGULATOR)	8/13/2014	
<u>PUBLIC MEETING ANNOUNCEMENT</u>	NOTICE OF PUBLIC HEARING / BOARD ACTION	LISA DERNBACH (REGULATOR)	1/20/2016	
<u>REGIONAL PLUME CHARACTERIZATION SUMMARY REPORT: SOUTH   PCE PLUME 2019-2020 FIELD SEASON</u>	SOIL AND WATER INVESTIGATION REPORT	ABBY CAZIER (REGULATOR)	6/10/2022	
<u>REQUEST FOR CLEANUP AND ABATEMENT ACCOUNT FUNDING</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	10/9/2014	
<u>REQUEST FOR REVISED CLEANUP AND ABATEMENT ACCOUNT FUNDING</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	LISA DERNBACH (REGULATOR)	1/27/2015	
<u>SCAP REGIONAL PCE PLUME INVESTIGATION PROJECT UPDATE - SENTRY WELL SAMPLING RESULTS</u>	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	12/10/2021	
<u>SCAP REGIONAL PCE PLUME INVESTIGATION PROJECT UPDATE TO INTERESTED PARTIES</u>	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	7/23/2021	
<u>SCAP REGIONAL PCE PLUME INVESTIGATION PROJECT UPDATE TO INTERESTED PARTIES</u>	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	8/20/2021	
<u>SUMMARY OF 13267 SITE HISTORY QUESTIONNAIRES AS OF JULY 26, 2019</u>	STAFF LETTER	ABBY CAZIER (REGULATOR)	8/22/2019	
<u>SENTRY WELL INSTALLATION SUMMARY REPORT: SOUTH   PCE PLUME</u>	WELL INSTALLATION REPORT	ED TARTER (AUTH_RP)	12/23/2021	39,086 KB

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>SENTRY WELL INSTALLATION WORKPLAN - FINAL</u>	WELL INSTALLATION WORKPLAN	ED TARTER (AUTH_RP)	7/13/2021	20,436 KB
<u>SEVEN SPRINGS LIMITED PARTNERSHIP AND FOX CAPITAL MANAGEMENT CORPORATION - SUPPLEMENTAL COMMENTS ON KENNEDY JENKS CONSULTANTS INC. DRAFT INTERIM REMEDIAL ACTION PLAN (IRAP) AND SOUTH Y PCE FACILITIES FEASIBILITY STUDY (FS)</u>	CORRESPONDENCE	BRIAN GREY (REGULATOR)	4/28/2020	
<u>SILVER STATE ANALYTICAL LABORATORIES, ANALYTICAL LABORATORY REPORT FOR PRIVATE WELL SAMPLING AT LBWC #1 AND PRIVATE WELL AT 609 ELOISE AVENUE BY LUKINS BROTHER WATER COMPANY</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	8/27/2019	
<u>SILVER STATE ANALYTICAL LABORATORIES, ANALYTICAL LABORATORY REPORT FOR SAMPLING AT LBWC #1 ON AUGUST 27, 2019 BY LUKINS BROTHERS WATER COMPANY</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	8/27/2019	
<u>SILVER STATE ANALYTICAL LABORATORIES, ANALYTICAL LABORATORY REPORT FOR SAMPLING AT LBWC #1 ON NOVEMBER 23, 2020 BY LUKINS BROTHERS WATER COMPANY</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	11/23/2020	
<u>SITE CLEANUP SUBACCOUNT PROGRAM (SCAP) - SOUTH "Y" PCE REGIONAL PLUME CHARACTERIZATION PROJECT UPDATES</u>	EMAIL CORRESPONDENCE	ABBY CAZIER (REGULATOR)	6/17/2019	
<u>SITE CLEANUP SUBACCOUNT PROGRAM (SCAP) - SOUTH LAKE TAHOE Y PCE PLUME - REGIONAL PLUME CHARACTERIZATION WORK PLAN</u>	SOIL AND WATER INVESTIGATION REPORT	ABBY CAZIER (REGULATOR)	7/3/2019	
<u>SOUTH LAKE TAHOE BORINGS GRAIN SIZE DISTRIBUTION</u>	OTHER REPORT / DOCUMENT	ED TARTER (AUTH_RP)	1/17/2022	889 KB
<u>SOUTH LAKE TAHOE PCE GROUNDWATER CONTAMINATION UPDATE FROM STPUD</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	1/28/2019	
<u>SOUTH LAKE TAHOE PCE GROUNDWATER CONTAMINATION UPDATE EMAIL FROM SHELLEY THOMSEN OF STPUD</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	9/25/2018	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>SOUTH Y ALTERNATIVES REVIEW CALL</u>	MEETING	BRIAN GREY (REGULATOR)	10/21/2019	
<u>SOUTH Y EXTRACTION WELL SUITABILITY INVESTIGATION, PREPARED BY GEI CONSULTANTS ON BEHALF OF DISTRICT</u>	PILOT STUDY/ TREATABILITY REPORT	ABBY CAZIER (REGULATOR)	6/29/2016	
<u>SOUTH Y FEASIBILITY STUDY OF REMEDIAL ALTERNATIVES TAC MEETING 3</u>	MEETING	BRIAN GREY (REGULATOR)	10/23/2018	
<u>SOUTH Y PCE FACILITIES FEASIBILITY STUDY, PREPARED BY ON BEHALF OF DISTRICT, PREPARED BY KENNEDY/JENKS CONSULTANTS ON BEHALF OF DISTRICT</u>	FEASIBILITY STUDY REPORT	ABBY CAZIER (REGULATOR)	5/10/2020	
<u>SOUTH Y PCE TECHNICAL MEETING</u>	MEETING	BRIAN GREY (REGULATOR)	5/13/2019	
<u>SOUTH Y PCE TECHNICAL WORKING GROUP MEETING</u>	MEETING	BRIAN GREY (REGULATOR)	2/27/2020	
<u>SOUTH Y PRE-DESIGN INVESTIGATION WORKPLAN (AGREEMENT D1712508), PREPARED BY KENNEDY/JENKS CONSULTANTS ON BEHALF OF DISTRICT</u>	PILOT STUDY / TREATABILITY WORKPLAN	ABBY CAZIER (REGULATOR)	3/23/2018	
<u>STAFF MEMO ON NEXT STEPS FOR SOUTH Y PCE INVESTIGATION</u>	VERBAL COMMUNICATION	LISA DERNBACH (REGULATOR)	9/2/2016	
<u>STAKEHOLDER ADVISORY GROUP MEETING FOR THE TAHOE VALLEY SOUTH GROUNDWATER MANAGEMENT PLAN</u>	MEETING	BRIAN GREY (REGULATOR)	12/21/2018	
<u>TKPOA FINDINGS OF THE SOUTH Y PCE INVESTIGATION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	BRIAN GREY (REGULATOR)	7/29/2016	
<u>TABLE SUMMARIZING PCE SAMPLING RESULTS IN TAHOE KEYS WATER COMPANY SUPPLY WELLS FROM 1989 - 20019</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	6/25/2019	
<u>TABLE SUMMARIZING PCE SAMPLING RESULTS IN TAHOE KEYS WATER COMPANY SUPPLY WELLS FROM 2020</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	10/6/2020	
<u>TASK 3 WORK PLAN - SOUTH LAKE TAHOE PCE PLUME REGIONAL PLUME CHARACTERIZATION DATA GAP INVESTIGATION</u>	SITE INVESTIGATION WORKPLAN	ED TARTER (AUTH_RP)	7/10/2020*	2,677 KB

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>TASK 5 WORK PLAN: NON-MUNICIPAL GW SUPPLY WELL SAMPLING</u>	OTHER WORKPLAN	ED TARTER (AUTH_RP)	10/11/2019*	181 KB
<u>TECHNICAL MEMORANDUM RESULTS OF PCE INVESTIGATION FOR TAHOE KEYS PROPERTY OWNER ASSOCIATION (TKPOA), SOUTH Y AREA, PREPARED BY GEI CONSULTANTS</u>	TECHNICAL MEMOS	ABBY CAZIER (REGULATOR)	8/15/2006	
<u>TELECONFERENCE WITH PROP 1 FEASIBILITY STUDY TAC.</u>	MEETING	BRIAN GREY (REGULATOR)	12/17/2019	
<u>WELL SAMPLING RESULTS FOR 575 ELOISE AVENUE</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	
<u>WATER ANALYSIS RESULTS FOR 609 ELOISE AVENUE</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	9/18/2014	
<u>WATER ANALYSIS FOR 661 EMERALD BAY ROAD WELL</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	9/9/2014	
<u>WATER ANALYSIS FOR 705 ELOISE AVENUE WELL</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	9/9/2014	
<u>WATER ANALYSIS FOR ROCKWATER APARTMENT/RESTAURANT</u>	LETTER - NOTICE	LISA DERNBACH (REGULATOR)	9/18/2014	
<u>WELL DECOMMISSIONING SUMMARY REPORT, LUKINS BROTHERS WATER COMPANY WATER SUPPLY WELL #4, SOUTH LAKE TAHOE Y AREA PCE PLUME</u>	WELL DESTRUCTION REPORT	ED TARTER (AUTH_RP)	8/18/2020	19,703 KB
<u>WELL SAMPLING RESULTS FOR 1995 12TH STREET</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	
<u>WELL SAMPLING RESULTS FOR 608 EMERALD BAY ROAD</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	
<u>WELL SAMPLING RESULTS FOR 609 ELOISE AVENUE</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	
<u>WELL SAMPLING RESULTS FOR 621 ELOISE AVENUE</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WELL SAMPLING RESULTS FOR 661 EMERALD BAY ROAD</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	
<u>WELL SAMPLING RESULTS FOR 675 EMERALD BAY ROAD</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	
<u>WELL SAMPLING RESULTS FOR TAHOE VALLEY ELEMENTARY SCHOOL, 943 TAHOE ISLAND DRIVE</u>	LETTER - NOTICE	ABBY CAZIER (REGULATOR)	11/18/2019	
<u>EMAIL FROM STPUD (THOMSEN) RE SOUTH LAKE TAHOE PCE GROUNDWATER CONTAMINATION UPDATE</u>	EMAIL CORRESPONDENCE	BRIAN GREY (REGULATOR)	3/20/2019	

3. Petition Documents

NO PETITION DOCUMENT SUBMITTALS FOUND FOR THIS FACILITY.

4. Monitoring Reports

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>SEMI-ANNUAL SENTRY WELL GROUNDWATER MONITORING REPORT, EVENT 1</u>	MONITORING REPORT - SEMI-ANNUALLY	ED TARTER (AUTH_RP)	6/30/2022*	10,082 KB

D. Community Involvement

1. Environmental Justice

DWR 2016 DISADVANTAGED COMMUNITY DESIGNATION - INFO

Disadvantaged Community

[CALENVIROSCREEN 3.0 SCORE - INFO](#)

[Percentile Range: 21-25%](#)

[CALENVIROSCREEN 4.0 SCORE - INFO](#)

[Percentile Range: 40-45%](#)

2. Community Involvement Documents

UPDATES AND INFORMATION

<u>DOCUMENT TITLE</u>	<u>DOCUMENT TYPE</u>	<u>DOCUMENT COMMENT</u>	<u>DOCUMENT DATE</u>	<u>DOCUMENT SIZE</u>
FINAL PROJECT REPORT AND DELIVERABLES COMPLETION LETTER re FEASIBILITY STUDY OF REMEDIAL ALTERNATIVES TO MITIGATE TETRACHLOROETHYLENE CONTAMINATION	Letter - Notice			452KB
FINAL PROJECT REPORT AND DELIVERABLES COMPLETION LETTER re FEASIBILITY STUDY OF REMEDIAL ALTERNATIVES TO MITIGATE TETRACHLOROETHYLENE CONTAMINATION	Letter - Notice			248KB
Well Sampling Results for Tahoe Valley Elementary School, 943 Tahoe Island Drive	Letter - Notice		11/18/2019	212KB
Well Sampling Results for 675 Emerald Bay Road	Letter - Notice		11/18/2019	204KB
Well Sampling Results for 661 Emerald Bay Road	Letter - Notice		11/18/2019	204KB
Well Sampling Results for 621 Eloise Avenue	Letter - Notice		11/18/2019	200KB
Well Sampling Results for 609 Eloise Avenue	Letter - Notice		11/18/2019	208KB
Well Sampling Results for 608 Emerald Bay Road	Letter - Notice		11/18/2019	172KB
Well Sampling Results for 1995 12th Street	Letter - Notice		11/18/2019	200KB
WELL SAMPLING RESULTS FOR 575 ELOISE AVENUE	Letter - Notice		11/18/2019	201KB
PCE MONITORING WELL DATA, TAHOE SOUTH Y, FALL 2016	Letter - Notice		12/21/2016	1,899KB
Public Meeting Announcement	Notice of Public Hearing / Board Action		1/20/2016	44KB
Letter Water Analysis for Schneewis Property,903 Eloise Avenue, Sampled on January 27, 2015	Letter - Notice		2/12/2015	1,761KB
Letter PCE in Domestic Well at 883 Eloise Avenue, Sampled on September 11, 2014	Letter - Notice		1/30/2015	182KB
Water Analysis for Rockwater Apartment/Restaurant	Letter - Notice		9/18/2014	193KB
Water Analysis Results for 609 Eloise Avenue	Letter - Notice		9/18/2014	184KB
Water Analysis for 705 Eloise Avenue Well	Letter - Notice		9/9/2014	171KB
Water Analysis for 661 Emerald Bay Road Well	Letter - Notice		9/9/2014	176KB

V. SOUTH Y PCE (SLO601794942) - (MAP)[SOUTH Y PCE \(SLO601794942\) - \(MAP\)](#)US HIGHWAY 50/EMERALD BAY ROAD
SOUTH LAKE TAHOE, CA 96150
EL DORADO COUNTYCLEANUP OVERSIGHT AGENCIES
LAHONTAN RWQCB (REGION 6T) (LEAD) - CASE #: T6S013
CASEWORKER: LISA DERNBACH[CLEANUP PROGRAM SITE \(INFO\)](#)

A. Regulatory Activities					
<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Response Requested - Other</i>	Other Report / Document	6/25/2019	6/25/2019	Table Summarizing PCE Sampling Results in Tahoe Keys Water Company Supply Wells from 1989 - 20019
	<i>Other Regulatory Actions</i>	File Review - Closure	2/26/2015	2/26/2015	PCE source is the Lake Tahoe Laundry Works
	<i>Other Regulatory Actions</i>	Meeting	7/18/2014	7/18/2014	Meeting to Discuss PCE in two Lukin's wells Met with Lukins Water Company and STPUD to discuss possible cause and sources of high PCE levels in Lukins Wells #2 and #5 from June and July 2014.
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/15/2009	9/15/2009	NO FURTHER ACTION REQUIRED LETTER CSK AUTO
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	6/1/2009	6/1/2009	Tahoe Valley Elem PCE Data
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/16/2009	3/16/2009	WB CORRESPONDENCE TO CSK AUTO
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/11/2009	1/11/2009	NO FURTHER ACTION REQUIRED
	<i>Response Requested - Other</i>	Other Report / Document	8/31/2008	8/31/2008	SUBSURFACE SOIL AND GW CONTAMINATION REPORT MCNAMARA
	<i>Response Requested - Other</i>	Other Report / Document	5/30/2008	5/30/2008	SITE INVESTIGATION REPORT HURZEL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/4/2008	5/4/2008	REQUIREMENT FOR ELECTRONIC SUBMITTAL SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/22/2008	4/22/2008	ADDITIONAL PHASE II SITE ASSESSMENT REPORT LETTER CSK AUTO
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/18/2008	4/18/2008	COMPLAINT SPILL REPORT FORM CASK AUTO
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/13/2008	3/13/2008	Waterboard Letter 960 Emerald Bay No History of Solvent Use
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/11/2008	2/11/2008	RESPONSE TO PROPOSED ACCESS AGREEMENT HURZEL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/6/2008	2/6/2008	AUTHORIZATION TO CONDUCT SOIL DISTURBANCE ACTIVITIES HURZEL

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/4/2008	1/4/2008	NO FURTHER ACTION REQUIRED WB TO MCNAMARA PROPERTY
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/10/2007	12/10/2007	WORKPLAN FOR INTERIM REMEDIATION HURZEL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/1/2007	11/1/2007	REQUEST FOR CLOSURE 787 EMERALD BAY ROAD
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/18/2007	9/18/2007	Waterboard Letter Review South Y Files Hoffey
	<i>Response Requested - Other</i>	Other Report / Document	8/24/2007	8/24/2007	SECOND QUARTER 2007 GW MONITORING AND SAMPLING MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/18/2007	7/18/2007	WORK PLAN FOR SOIL AND GROUNDWATER CHARACTERIZATION HURZEL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/28/2007	6/28/2007	Waterboard Letter Tahoe Valley Elementary PCE Data
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/26/2007	5/26/2007	REQUEST FOR PROPOSAL FOR REMEDIATION SERVICES HURZEL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/18/2007	5/18/2007	REQUEST FOR CLEAN UP PLAN, 949 EMERALD BAY ROAD HURZEL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/23/2007	4/23/2007	2007.04.23_CITY OF SLT LETTER OF TRANSMITTAL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/23/2007	4/23/2007	CITY OF SLT LETTER OF TRANSMITTAL CSK AUTO
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/18/2007	4/18/2007	TCI BUILDING CORRESPONDENCES WB TO ROSS GROELZ
	<i>Response Requested - Other</i>	Other Report / Document	2/13/2007	2/13/2007	FOURTH QUARTER 2006 GW MONITORING AND SAMPLING REPORT
	<i>Response Requested - Other</i>	Other Report / Document	10/1/2006	10/1/2006	GW INSTALLATION REPORT MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/16/2006	6/16/2006	WORK PLAN FOR WELL INSTALLATION, GROUNDWATER EXTRACTION AND SAMPLING MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/4/2006	5/4/2006	CASE CLOSURE REQUEST SOUTH Y SHELL
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	2/27/2006	2/27/2006	Tahoe Valley Elem PCE Data

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/6/2005	12/6/2005	ACCEPTANCE OF WORK PLAN FOR WELL INSTALLATION MCNAMARA
	<i>Response Requested - Other</i>	Other Report / Document	11/11/2005	11/11/2005	Lawyer(CADEnterprisesBigO) Letter Notice of Interested Party
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/19/2005	10/19/2005	Waterboard Letter PCE Data 702 EmeraldBay
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/13/2005	10/13/2005	Waterboard Letter Water Analysis 1995 12th St
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/30/2005	9/30/2005	1995 12th Kitchen Faucet Lab Data
	<i>Response Requested - Other</i>	Other Report / Document	8/1/2005	8/1/2005	GROUNDWATER SAMPLING REPORT 2005 MCNAMARA
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Investigation	4/20/2005	4/20/2005	Report of Subsurface Investigation, Kmart Facility No. 9153, 1030 Tata Lane, prepared by Environmental Science & Engineering, Inc.
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/23/2005	3/23/2005	ACCEPTANCE OF RECOMMENDATIONS IN WP FOR ADDITIONAL GW INVESTIGATIONS MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/23/2005	3/23/2005	ACCEPTANCE OF RECOMMENDATIONS IN WORK PLAN MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/4/2005	2/4/2005	WORK PLAN FOR ADDITIONAL GW INVESTIGATION MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/5/2005	1/5/2005	NO FURTHER ACTION REQUIRED FOR THE HOUSE OF CARPETS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/7/2004	12/7/2004	WB_NO FURTHER ACTION LETTER TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	11/29/2004	11/29/2004	GW SAMPLING REPORT FOR 787 EMERALD BAY RD
	<i>Response Requested - Other</i>	Other Report / Document	10/27/2004	10/27/2004	QUARTERLY GW MONITORING REPORT TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/20/2004	10/20/2004	RECEIPT LETTER TO WB TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/6/2004	10/6/2004	GROUNDWATER SAMPLING REPORT 2004 MCNAMARA
	<i>Response Requested - Other</i>	Other Report / Document	10/6/2004	10/6/2004	GROUNDWATER SAMPLING REPORT 2004 MCNAMARA
	<i>Response Requested - Other</i>	Other Report / Document	9/27/2004	9/27/2004	QUARTERLY GW MONITORING REPORT TAHOE ASPHALT

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/21/2004	9/21/2004	ACCEPTANCE OF PROPOSAL TO MODIFY THE EXISTING GW SAMPLING PROGRAM SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	9/17/2004	9/17/2004	QUARTERLY GW MONITORING REPORT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/2/2004	9/2/2004	WB_NOA REVOKED TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	8/17/2004	8/17/2004	GW ANALYSIS FOR PCE TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/13/2004	7/13/2004	SAMPLE ANALYSIS RESULTS AND CORRESPONDENCES SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/12/2004	7/12/2004	RECISSION OF CLEANUP AND ABATEMENT ORDER SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	7/1/2004	7/1/2004	QUARTERLY GW MONITORING AND REMEDIATION REPORT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/23/2004	6/23/2004	SAMPLE ANALYSIS RESULTS AND CORRESPONDENCES SOUTH Y SHELL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/18/2004	6/18/2004	Waterboard Letter 960 EmeraldBay No History of Solvent Use
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/15/2004	6/15/2004	2004.06.15_CONFIRMATION LETTER REVISED ANALYTES
	<i>Response Requested - Other</i>	Other Report / Document	5/18/2004	5/18/2004	2004.05.18_QUARTERLY GW MONITORING REPORT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/17/2004	5/17/2004	SAMPLE ANALYSIS RESULTS AND CORRESPONDENCES SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Staff Letter	4/27/2004	4/27/2004	
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/27/2004	4/27/2004	Waterboard Letter Request Sewer Info STPUD
	<i>Response Requested - Workplans</i>	Corrective Action Plan / Remedial Action Plan	4/20/2004		Corrective Action Plan / Remedial Action Plan - For remediating PCE contamination
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	4/9/2004	4/9/2004	Seven Spring Letter Interest PCE Contamination South Y Center
	<i>Response Requested - Other</i>	Other Report / Document	1/29/2004	1/29/2004	QUARTERLY GW MONITORING REPORT TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/27/2004	1/27/2004	MODIFICATION OF CLEANUP AND ABATEMENT ORDER
	<i>Response Requested - Reports</i>	Soil and Water Investigation Report	1/20/2004		Soil and Water Investigation Report - For PCE contamination

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Response Requested - Other</i>	Other Report / Document	12/9/2003	12/9/2003	QUARTERLY GW MONITORING REPORT TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/2/2003	12/2/2003	TETRACHLOROETHENE (PCE) REPORT OF FINDINGS HURZEL
	<i>Response Requested - Other</i>	Other Report / Document	10/6/2003	10/6/2003	UST SYSTEM REMOVAL AND WELL DESTRUCTION REPORT SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/25/2003	9/25/2003	APPROVAL OF WORKPLAN FOR POTENTIAL PCE INVESTIGATION HURZEL
	<i>Response Requested - Other</i>	Other Report / Document	9/25/2003	9/25/2003	Sierra Pacific Group Cover Letter Workplan Soil & Groundwater Investigation BigOTires
	<i>Other Regulatory Actions</i>	* Verbal Communication	9/18/2003	9/18/2003	
	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	9/15/2003		Soil and Water Investigation Workplan - For PCE contamination
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/11/2003	9/11/2003	Tahoe Valley Elem PCE Data
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/3/2003	9/3/2003	WORKPLAN FOR POTENTIAL PCE SOURCE INVESTIGATION HURZEL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/3/2003	9/3/2003	WB_REQUEST FOR ADDITIONAL INFORMATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/25/2003	8/25/2003	WORK PLAN FOR SOIL EXCAVATION AT 787 EMERALD BAY ROAD
	<i>Response Requested - Other</i>	Other Report / Document	8/25/2003	8/25/2003	SOIL AND GW CHARACTERIZATION REPORT MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/21/2003	8/21/2003	Waterboard Letter Approval Groundwater Investigation Workplan LTLW
	<i>Response Requested - Workplans</i>	Other Workplan	8/17/2003		
	<i>Response Requested - Other</i>	Other Report / Document	8/13/2003	8/13/2003	PES Groundwater Investigation Workplan Cover Page LTLW
	<i>Enforcement/Orders</i>	Clean-up and Abatement Order - #RB6S2003031	8/4/2003	8/4/2003	
	<i>Response Requested - Other</i>	Other Report / Document	8/4/2003	8/4/2003	QUARTERLY GW MONITORING REPORT TAHOE ASPHALT
	<i>Enforcement/Orders</i>	Clean-up and Abatement Order - #RB6S2003030	8/4/2003	8/4/2003	
	<i>Response Requested - Workplans</i>	Soil and Water Investigation Workplan	*8/16/2003		Soil and Water Investigation Workplan
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/16/2003	7/16/2003	EDCEM Tahoe Montessori Letter
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/16/2003	7/16/2003	EDCEM Tahoe Montessori Analytical Data

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Response Requested - Other</i>	Other Report / Document	7/11/2003	7/11/2003	Lien South Y Center
	<i>Enforcement - Other</i>	* LETO	7/8/2003	7/8/2003	
	<i>Response Requested - Other</i>	Other Report / Document	7/3/2003	7/3/2003	QUARTERLY GW MONITORING AND REMEDIATION REPORT SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/11/2003	6/11/2003	ANALYTICAL RESULTS OF SPLIT GW SAMPLES SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	6/11/2003	6/11/2003	ANALYTICAL RESULTS OF SPLIT GW RESULTS FOR SOUTH Y SHELL STATION
	<i>Response Requested - Other</i>	Other Report / Document	6/11/2003	6/11/2003	ANALYTICAL RESULTS OF SPLIT GW SAMPLES SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	6/11/2003	6/11/2003	ANALYTICAL RESULTS OF SPLIT GW SAMPLES SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Staff Letter	6/5/2003	6/5/2003	
	<i>Response Requested - Other</i>	Other Report / Document	6/5/2003	6/5/2003	Notice to Submit Workplan LTLW
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/27/2003	5/27/2003	WB_REQUEST FOR ADDITIONAL INFORMATION
	<i>Response Requested - Other</i>	Other Report / Document	4/23/2003	4/23/2003	QUARTERLY GW MONITORING REPORT TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	3/24/2003	3/24/2003	QUARTERLY GW MONITORING REPORT TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/19/2003	3/19/2003	WB_NOTICE OF VIOLATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/12/2003	3/12/2003	UST CLEANUP FUND STAFF DECISION TO REJECT CLAIM MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/6/2003	3/6/2003	MODIFICATION OF GW MONITORING PROGRAM CAO
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/24/2003	1/24/2003	Waterboard Letter NFAR Montgomery Wards
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/20/2002	12/20/2002	NOV FOR DELINQUENT TECHNICAL REPORT MCNAMARA
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/12/2002	12/12/2002	EL DORADO COUNTY AND WB DIRECTIVE LETTERS MCNAMARA
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/14/2002	11/14/2002	ERRG Figures from Groundwater Assesment Report Montgomery Wards
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Investigation	11/1/2002	11/1/2002	ERRG GW Investigation Report Montgomery
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/24/2002	10/24/2002	GHH Regional PCE Data Compilation South Tahoe Y Area
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/17/2002	9/17/2002	Unauthorized Release Form South Y PCE

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/16/2002	9/16/2002	Waterboard Letter Approval Groundwater Investigation Workplan Montgomery Wards
	<i>Response Requested - Other</i>	Other Report / Document	9/3/2002	9/3/2002	SUBSURFACE SOIL AND GW CONTAMINATED SOIL REMOVAL MCNAMARA
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/13/2002	8/13/2002	Lawyer Letter Reconsider Request for WP Montgomery Wards
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/29/2002	7/29/2002	Lawyer Letter Notice to Submit Workplan Montgomery Wards
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/18/2002	7/18/2002	INTERNAL MEMO UST REMOVAL MCNAMARA
	<i>Other Regulatory Actions</i>	Staff Letter	7/15/2002	7/15/2002	
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/15/2002	7/15/2002	Waterboard Letter Groundwater Investigation Montgomery Wards
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/24/2002	6/24/2002	WORK PLAN APPROVAL WITH MODIFICATIONS 787 EMERALD BAY RD
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/21/2002	6/21/2002	CLARIFICATION ON THE GEOPHYSICAL SURVEY PERFORMED HOUSE OF CARPETS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/17/2002	6/17/2002	DENIAL OF REQUEST FOR SITE CLOSURE 924 EMERALD BAY
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	5/31/2002	5/31/2002	Lawyer Letter Request Extension for WP & Site History No Record of Solvent Use MontgomeryWards
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/30/2002	5/30/2002	WORK PLAN FOR 783-787 EMERALD BAY ROAD
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/7/2002	5/7/2002	REQUIREMENT TO SUBMIT CORRESPONDENCES AND REPORTS SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/30/2002	4/30/2002	WB_COMPLAINT REQUEST NOTICE TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/30/2002	4/30/2002	2002.04.30_WB_COMPLAINT REQUEST NOTICE
	<i>Enforcement/Orders</i>	Notice of Violation	4/29/2002	4/29/2002	
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/29/2002	4/29/2002	Waterboard Letter Delinquent Workplan Montgomery Wards
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	4/15/2002	4/15/2002	Facility Enforcement Report Montgomery Wards

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Response Requested - Other</i>	Fact Sheets - Public Participation	4/4/2002	4/4/2002	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/3/2002	4/3/2002	REQUIRED ELECTRONIC DELIVERABLE FORMAT FOR LABORATORY HOUSE OF CARPETS
	<i>Other Regulatory Actions</i>	Staff Letter	3/4/2002	3/4/2002	
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/4/2002	3/4/2002	Waterboard Letter Notice to Submit Groundwater Investigation Workplan Montgomery Wards
	<i>Other Regulatory Actions</i>	Staff Letter	3/4/2002	3/4/2002	
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/28/2002	2/28/2002	MODIFICATION OF GW MONITORING PROGRAM IN CAO SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	1/9/2002	1/9/2002	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/27/2001	12/27/2001	WORKPLAN FOR SUBSURFACE SOIL INVESTIGATION TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/8/2001	11/8/2001	Waterboard Letter 780 Rogers AnalyticalData
	<i>Response Requested - Other</i>	Other Report / Document	10/23/2001	10/23/2001	Harding Groundwater Investigation Workplan Huzel
	<i>Response Requested - Other</i>	Other Report / Document	10/5/2001	10/5/2001	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Staff Letter	10/3/2001	10/3/2001	
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/19/2001	9/19/2001	Fax Lukins Unable to Sample Old Stage
	<i>Response Requested - Other</i>	Other Report / Document	8/24/2001	8/24/2001	Facility Violation Report Hurzel
	<i>Other Regulatory Actions</i>	Staff Letter	7/24/2001	7/24/2001	
	<i>Other Regulatory Actions</i>	Staff Letter	7/20/2001	7/20/2001	
	<i>Other Regulatory Actions</i>	Staff Letter	7/12/2001	7/12/2001	
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/10/2001	7/10/2001	ENVIRONMENTAL SITE ASSESSMENT LETTER REPORT HOUSE OF CARPET
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/14/2001	6/14/2001	SOIL AND GROUNDWATER CONTAMINATION HOUSE OF CARPETS
	<i>Response Requested - Other</i>	Other Report / Document	6/11/2001	6/11/2001	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/16/2001	5/16/2001	CASE CLOSURE ATTACHMENTS FOR CLOSURE REPORT UPS

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/10/2001	5/10/2001	Waterboard Letter CAA Funds Sample Old Stage
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/25/2001	4/25/2001	Waterboard Letter Request to Sample Old Stage
	<i>Response Requested - Other</i>	Other Report / Document	4/24/2001	4/24/2001	Lukins Letter MTBE & PCE Data
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	4/24/2001	4/24/2001	Lukins Letter MTBE & PCE Data
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/11/2001	4/11/2001	2001.04.11_APPROVAL FOR SUSPENSION OF GW TREATMENT SYSTEM
	<i>Response Requested - Other</i>	Other Report / Document	4/11/2001	4/11/2001	FACILITY ENFORCEMENT REPORT TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/18/2001	3/18/2001	TRANSMITTAL LETTER WB TO STPUD SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/14/2001	2/14/2001	INVESTIGATION OF CHLORINATED SOLVENT CONTAMINATION HURZEL
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	2/14/2001	2/14/2001	Resource Concepts Letter PCE Results Garfinkle Property
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/8/2001	2/8/2001	OFFSITE SEASONAL SOIL DISTURBANCE VARIANCE SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	2/1/2001	2/1/2001	GHH Additional Assessment Report TCI Building
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/31/2001	1/31/2001	Waterboard Violation Report BelPac
	<i>Response Requested - Other</i>	Other Report / Document	12/11/2000	12/11/2000	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Response Requested - Reports</i>	CAP/RAP - Other Report	12/11/2000	12/11/2000	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	12/11/2000	12/11/2000	2000.12.11_SUBSURFACE SOIL SAMPLING RESULTS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/6/2000	11/6/2000	APPROVAL OF PROPOSED GW EXTRACTION WELLS SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/3/2000	10/3/2000	CORRESPONDENCE WB TO CHARLES HAMILTON
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/3/2000	10/3/2000	VARIANCE FOR SOIL DISTURBANCE PROHIBITION SOUTH Y SHELL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/3/2000	10/3/2000	CORRESPONDENCE WB TO CHARLES HAMILTON

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/1/2000	10/1/2000	SUPPLEMENTAL INVESTIGATION OF UPS SOUTH LAKE TAHOE CENTER
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/20/2000	9/20/2000	NOTICE TO SUBMIT WP TO PCE SOURCE INVESTIGATION TCI
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/15/2000	9/15/2000	GENERAL CORRESPONDENCES WB TO MILLER SOUTH Y SHELL
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	9/6/2000	9/6/2000	Apex Groundwater Investigation Report BelPac
	<i>Response Requested - Reports</i>	CAP/RAP - Other Report	9/5/2000	9/5/2000	2000.09.05_GW MONITORING REPORT AND SYSTEM OPERATION
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/31/2000	7/31/2000	CORRESPONDENCE WB TO TO FELDMAN SHAW & DEVORE TCI
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/14/2000	6/14/2000	ADDITIONAL INVESTIGATION WORKPLAN TCI BUILDING
	<i>Response Requested - Other</i>	Other Report / Document	6/10/2000	6/10/2000	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	5/31/2000	5/31/2000	APEX Addendum Workplan Groundwater Investigation BelPac
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/23/2000	5/23/2000	Waterboard Letter Workplan Approval BelPac
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	5/3/2000	5/3/2000	APEX Workplan Groundwater Investigation BelPac
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/21/2000	4/21/2000	GRADING DEADLINE EXCEPTION RELOCATION OF REMDIATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/20/2000	4/20/2000	APPROVAL FOR ALTERNATIVE USE OF TREATED GW TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/20/2000	4/20/2000	TEMPORARY SHUTDOWN OF GW TREATMENT SYSTEM
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/4/2000	4/4/2000	TAHOE ASPHALT TO WB
	<i>Other Regulatory Actions</i>	Staff Letter	3/30/2000	3/30/2000	
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	3/21/2000	3/21/2000	NFAR Shehadi
	<i>Response Requested - Other</i>	Other Report / Document	3/15/2000	3/15/2000	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/14/2000	3/14/2000	VARIANCE FOR SOIL DISURBANCE PROHIBITION SOUTH Y SHELL

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/9/2000	3/9/2000	WORKPLAN FOR SUBSURFACE SOIL INVESTIGATION TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	3/8/2000	3/8/2000	2000.03.08_ANALYTICAL RESULTS OF SUBSURFACE INVESTIGATION
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/28/2000	2/28/2000	APPROVAL OF REQUEST TO MODIFY GW SAMPLING AND REPORTING SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	2/16/2000	2/16/2000	ETHANOL IN GW REPORT SOUTH Y SHELL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/9/2000	2/9/2000	Waterboard Letter Response Needed Groundwater Investigation BelPac
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	2/9/2000	2/9/2000	Secor Site Characterization Report Shehadi Motors
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/28/2000	1/28/2000	REQUEST FOR INFORMATION OF GASOLINE SOURCES SOUTH Y SHELL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/27/2000	1/27/2000	Waterboard Letter NRFA SouthShore
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/24/2000	1/24/2000	Grabowsky Letter Chemical Use Anchor Printing Tenancy BelPac
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/13/2000	1/13/2000	Waterboard Letter Notice of Delinquent Groundwater Investigation Report Shehadi
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/12/2000	1/12/2000	TRPA REVISION MINOR GRADING PERMIT SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	1/10/2000	1/10/2000	TECHNICAL REPORT PRESENTATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/28/1999	12/28/1999	SUBSURFACE SOIL INVESTIGATION
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/22/1999	12/22/1999	Waterboard Letter Notice to Submit Groundwater Investigation Workplan BelPac
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/21/1999	12/21/1999	Waterboard Letter Workplan Approval Baker Automotive
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/21/1999	12/21/1999	Waterboard Letter Approval Groundwater Investigation Workplan TCI
	<i>Response Requested - Other</i>	Other Report / Document	12/14/1999	12/14/1999	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/10/1999	12/10/1999	WORKPLAN FOR LIMITED SUBSURFACE INVESTIGATION TCI

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[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/10/1999	12/10/1999	Facility Violation Report Baker Automotive
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/10/1999	12/10/1999	EDCEH Approval Infiltration Trench Soil & Groundwater Investigation Workplan Shehadi
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/10/1999	12/10/1999	Secor Report of Findings 1,2-DCE GW Investigation South Shore Motors
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/9/1999	12/9/1999	REQUEST FOR INFORMATION ON GASOLINE FORMULATION SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/30/1999	11/30/1999	CORRECTIVE ACTION PLAN APPROVAL SOUTH TAHOE SHELL GAS STATION
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/15/1999	11/15/1999	Waterboard Letter Notice of Intended Enforcement Action Baker Automotive
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/15/1999	11/15/1999	Facility Enforcement Report Baker Automotive
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/10/1999	11/10/1999	SPILL PREVENTION AND COUNTERMEASURE PLAN TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	11/10/1999	11/10/1999	FACILITY ENFORCEMENT REPORT MCNAMARA
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/9/1999	11/9/1999	Waterboard Letter Approval Groundwater Investigation Workplan Shehadi
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/8/1999	11/8/1999	GW SYSTEM STARTUP TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Staff Letter	11/5/1999	11/5/1999	
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/29/1999	10/29/1999	Secor Map & Lab Report South Shore Motors
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/27/1999	10/27/1999	NOA OF WDRs FOR GENERAL LAND DISPOSAL TAHOE ASPHALT
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/27/1999	10/27/1999	Secor Memo Addendum Workplan Soil Removal Shehadi
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/26/1999	10/26/1999	EDCEH Letter Comments Pb & Cr Soil Removal Workplan Shehadi
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/22/1999	10/22/1999	2111 Dunlap PCE Data
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/12/1999	10/12/1999	SITE INVESTIGATION WORK PLAN SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/11/1999	10/11/1999	FACILITY ENFORCEMENT REPORT MCNAMARA
	<i>Response Requested - Other</i>	Fact Sheets - Public Participation	10/1/1999	10/1/1999	THIRD QUARTER GW MONITORING REPORT SOUTH Y SHELL

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	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/22/1999	9/22/1999	REPORT OF WASTE DISCHARGE AND INFORMATION TO SUPPORT DISCHARGE TO LAND TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	9/13/1999	9/13/1999	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	9/10/1999	9/10/1999	WELL COMPLETION REPORT SOUTH Y SHELL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/9/1999	9/9/1999	Waterboard Letter Notice of Delinquent WP Baker Automotive
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/5/1999	9/5/1999	Waterboard Board Meeting Status Report South Y PCE Investigation
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/31/1999	8/31/1999	Secor Workplan Groundwater Investigation 1,2-DCA SouthShore
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/15/1999	8/15/1999	Waterboard Facility Violation Report Baker Automotive
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/10/1999	8/10/1999	GW TREATMENT SYSTEM NOTICE TO INSTALL TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/10/1999	8/10/1999	NOTICE TO INSTALL MONITORING WELLS TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/9/1999	8/9/1999	Waterboard Letter Solvent Use Welcomes
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/5/1999	8/5/1999	COORDINATED SAMPLING REQUIREMENT SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/29/1999	7/29/1999	WORK PLAN FOR GW MONITORING WELL INSTALLATION TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/26/1999	7/26/1999	Waterboard Letter Comments Groundwater Investigation Report South Shore
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/22/1999	7/22/1999	Waterboard Letter Comments Groundwater Investigation Shehadi
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/20/1999	7/20/1999	AMENDED CLEANUP AND ABATEMENT ORDER (CAO) SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/16/1999	7/16/1999	COMMENTS ON GW EXTRACTION SYSTEM DESIGN SOUTH Y SHELL
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/16/1999	7/16/1999	EDCEH Letter Waterboard Infiltration Trench Contamination Shehadi

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENT</u>
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/16/1999	7/16/1999	EDCEH Letter Infiltration Trench Investigation Workplan Shehadi
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/13/1999	7/13/1999	Waterboard Letter Delinquent Solvent Use Request Belpac
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/13/1999	7/13/1999	Waterboard Letter NFAR High School
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	7/5/1999	7/5/1999	Lawyer Letter Welcomes
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[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	6/25/1999	6/25/1999	Secor Groundwater Investigation Report South Shore & Shehadi
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/24/1999	6/24/1999	Waterboard Letter Delinquent Workplan Welcomes
	<i>Response Requested - Other</i>	Other Report / Document	6/14/1999	6/14/1999	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/11/1999	6/11/1999	REQUEST FOR REMEDIATION AND ADDITIONAL INVESTIGATION
[VIEW DOCS]	<i>Response Requested - Other</i>	Correspondence	5/26/1999	5/26/1999	Apex Result Report Groundwater Investigation High School
	<i>Response Requested - Other</i>	Other Report / Document	5/26/1999	5/26/1999	Apex Result Report Groundwater Investigation HighSchool
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	5/17/1999	5/17/1999	Secor Map & LabReport South Shore & Shehadi
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/28/1999	4/28/1999	UST CASE CLOSURE RUNNELS AUTOMOTIVE
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/23/1999	4/23/1999	CERTIFICATION OF CURRENT RECORD OWNERS TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/16/1999	4/16/1999	Waterboard Letter Private Well PCE Results Crystal Range
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	4/16/1999	4/16/1999	Tahoe Valley Elem PCE Data
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/9/1999	4/9/1999	CORRECTIVE ACTION PLAN TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/31/1999	3/31/1999	Waterboard Letter Disclosure of Solvent Use_918_920_934 Eloise(SouthSideAuto)
	<i>Response Requested - Other</i>	Other Report / Document	3/31/1999	3/31/1999	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/18/1999	3/18/1999	SOUTH Y SHELL RUNNEL' AUTO CORRESPONDENCES
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/4/1999	3/4/1999	Waterboard Letter NFAR StageBus
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/1/1999	3/1/1999	SUMMARY OF SITE REMEDIATION ACTIVITIES TAHOE ASPHALT
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	2/25/1999	2/25/1999	97-98 Summary Results South Y PCE Investigations
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/22/1999	2/22/1999	Waterboard Letter Comments Groundwater Investigation Workplan HighSchool
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	2/22/1999	2/22/1999	Phase Three Letter Groundwater Investigation Report Submittal StageBus
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/22/1999	2/22/1999	1999.2.22 Waterboard Letter Comments Groundwater Investigation Workplan HighSchool
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	2/8/1999	2/8/1999	Phase Three Enviro GW Invesitgation Stage Bus Facility
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/2/1999	2/2/1999	SITE INVESTIGATION WORK PLAN ADDENDUM SOUTH Y SHELL
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/28/1999	1/28/1999	WORKPLAN STATUS FOR TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/26/1999	1/26/1999	AMENDMENT TO CAO REQUIREMENT FOR ADDITIONAL INVESTIGATION SOUTH Y SHELL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/22/1999	1/22/1999	Waterboard Letter Workplan Not Required Terry Libbon
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/20/1999	1/20/1999	Secor WP Groundwater Investigation South Shore & Shehadi
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/19/1999	1/19/1999	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/17/1999	1/17/1999	PROJECT UPDATE TAHOE ASPHALT
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/12/1999	1/12/1999	Terry Libbon Letter Response
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/5/1999	1/5/1999	SITE INVESTIGATION WORK PLAN ADDENDUM SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	1/1/1999	1/1/1999	1999 NURDS Entry Baker Automotive

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/29/1998	12/29/1998	CLEANUP AND ABATEMENT ORDER CAO FOR SHELL SERVICE STATION
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/15/1998	12/15/1998	Notice of Delinquent Workplan Terry Libbon Motors
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/9/1998	12/9/1998	Waterboard Letter Workplan Approval StageBus
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/8/1998	12/8/1998	Waterboard Letter Extension Approval Groundwater Workplan Submittal South Shore & Shehadi
	<i>Response Requested - Other</i>	Other Report / Document	12/1/1998	12/1/1998	SITE CHARACTERIZATION REPORT TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/24/1998	11/24/1998	Waterboard Letter Request Groundwater Investigation Welcomes
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/18/1998	11/18/1998	Phase Three Letter Workplan Submittal StageBus
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/17/1998	11/17/1998	Shehadi Letter Request Extension Groundwater Investigation Workplan South Shore & Shehadi
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/30/1998	10/30/1998	City of SLT Letter Workplan StageBus
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/23/1998	10/23/1998	Waterboard Letter Request for Workplan StageBus
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/21/1998	10/21/1998	Waterboard Letter Notice to Submit Groundwater Investigation Workplan South Shore Motors
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/21/1998	10/21/1998	Waterboard Letter Notice to Submit Groundwater Investigation Workplan Terry Libbon Motors
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/21/1998	10/21/1998	Waterboard Letter Notice to Submit Groundwater Investigation Workplan Shehad
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/20/1998	8/20/1998	STPUD Letter Sewer Observations StageBus
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/17/1998	8/17/1998	APPROVAL OF WORKPLAN FOR SOLVENT INVESTIGATION TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/13/1998	8/13/1998	Waterboard Letter Tahoe Valley Townhomes Not Suspected Source
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/20/1998	7/20/1998	Waterboard Final Invoice STPUD Groundwater Investigation
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/17/1998	7/17/1998	Waterboard Letter Sewer Lateral PCE Detection StageBus

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/17/1998	7/17/1998	STAGE BUS PROPERTY SLT CORRESPONDENCE WB TO STAGE BUS
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/15/1998	7/15/1998	Waterboard Letter Request Solvent Use Campora
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/15/1998	7/15/1998	Waterboard Letter Request Solvent Use History Galicia
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/14/1998	7/14/1998	PROPOSED WORK PLAN TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	7/10/1998	7/10/1998	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/6/1998	7/6/1998	Waterboard Letter Welcomes Request Solvent Use History
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/4/1998	6/4/1998	SOLVENT CONTAMINATION LETTER TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/11/1998	5/11/1998	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/16/1998	4/16/1998	NOA OF GENERAL WDRs FOR PROPOSED LAND DISPOSAL TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/16/1998	4/16/1998	VARIANCE TO THE TAHOE BASIN MAY 1 SOIL DISTURBANCE TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/15/1998	4/15/1998	PRE-APPROVAL OF CORRECTIVE ACTION COSTS TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/14/1998	4/14/1998	GRADING DEADLINE EXCEPTION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/13/1998	4/13/1998	APPLICATION REPORT OF WASTE DISCHARGE TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/8/1998	4/8/1998	INFORMATION ON TESTING ON GW TREATMENT SYSTEM TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	4/6/1998	4/6/1998	1998.04.06_DRAINAGE AND EROSION CONTROL TECHNICAL REPORT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/26/1998	3/26/1998	WDR NPDES 401 APPLICATION LETTER TAHOE ASPHALT

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/23/1998	3/23/1998	PROPOSED DISCHARGE OF TREATED GROUNDWATER TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/18/1998	3/18/1998	ADDENDUM TO 11-11-97 WORK PLAN TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	3/9/1998	3/9/1998	1998.03.09_WB LETTER TO TAHOE ASPHALT
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	3/5/1998	3/5/1998	Lawyer Letter Allowing Site Access Welcomes
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/23/1998	2/23/1998	Waterboard Letter Access Request Welcomes AutoBody
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/23/1998	2/23/1998	STPUD TO TAHOE ASPHALT
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/27/1998	1/27/1998	South Y Groundwater Study Sampling Results prepared by Agra Earth & Environment
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/23/1998	1/23/1998	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	1/23/1998	1/23/1998	SECOND QUARTERLY REPORT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/23/1998	1/23/1998	PROPOSED WORK PLAN TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/23/1998	1/23/1998	PROPOSED WORK PLAN TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/23/1998	1/23/1998	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	12/18/1997	12/18/1997	STPUDResolutionNO.2662
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/18/1997	11/18/1997	UST CLEANUP FUND STAFF CORRESPONDENCES KMART
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	11/11/1997	11/11/1997	SOIL EXCAVATION WORK PLAN TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/11/1997	9/11/1997	UNDEGROUND STORAGE TANK CLEANUP FUND PROGRAM TAHOE ASPHALT

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	9/11/1997	9/11/1997	UNDEGROUND STORAGE TANK CLEANUP FUND PROGRAM
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/28/1997	8/28/1997	CLOSURE OF UST WB LETTER TO RUNNELS
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/25/1997	8/25/1997	Board Meeting Agenda Letters
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/22/1997	8/22/1997	PETITION OF RUNNELS AUTOMOTIVE (CLOSURE OF UST)
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/20/1997	8/20/1997	Agency Agreement Support PCE Investigation
	<i>Response Requested - Other</i>	Other Report / Document	7/17/1997	7/17/1997	WB STAFF REPORT ON UST RUNNELS AUTOMOTIVE
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/9/1997	6/9/1997	GW MONITORING REPORT AND SYSTEM OPERATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/30/1997	5/30/1997	INTERNAL MEMO CORRESPONDENCES FROM RUNNELS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	4/15/1997	4/15/1997	REVIEW OF MARCH 1997 SITE CHARACTERIZATION STUDY TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	3/1/1997	3/1/1997	GW CHARACTERIZATION REPORT ADDITIONAL OWENS BROTHERS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/28/1996	10/28/1996	PROPOSED WORKPLAN FOR FURTHER SITE CHARACTERIZATION TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/7/1996	10/7/1996	TAHOE ASPHALT PROPERTY INVESTIGATION RESULT
	<i>Response Requested - Other</i>	Other Report / Document	10/1/1996	10/1/1996	SOIL AND GW MONITORING REPORT TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/23/1996	7/23/1996	APPROVAL OF SITE CHARACTERIZATION PLAN FOR TAHOE ASPHALT
	<i>Response Requested - Other</i>	Other Report / Document	4/3/1996	4/3/1996	GW INVESTIGATION AT RUNNELS AUTOMOTIVE
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/5/1996	1/5/1996	Summarizes investigations performed in the South "Y" area from 1992 through 1995 which included passive soil gas sampling using Petrex Tubes and sewer sampling to identify potential sources of contamination. Includes the rationale for additional funding to continue investigations to identify source(s).
	<i>Response Requested - Other</i>	Other Report / Document	11/1/1995	11/1/1995	SITE CHARACTERIZATION STUDY

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/20/1995	10/20/1995	CLOSURE OF UST REPORT PORTER GEOTECHNICAL OWENS BROTHER
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	8/30/1995	8/30/1995	WB TO RUNNELS CORRESPONDENCES
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/13/1995	6/13/1995	GW ASSESSMENT FORMER UST SOUTH Y CENTER KMART
	<i>Response Requested - Other</i>	Other Report / Document	3/17/1995	3/17/1995	LIMITED SUBSURFACE INVESTIGATION REPORT TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/18/1995	1/18/1995	GW ASSESSMENT FOR PREVIOUS UST AT SOUTH Y CENTER KMART
	<i>Response Requested - Other</i>	Other Report / Document	9/30/1994	9/30/1994	UST CLOSURE REPORT SOUTH Y CENTER KMART
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	8/30/1994	8/30/1994	Soil Sample Location Map and Summary of Analytical Results for Soil Samples, U-Haul UST Excavation, 1105 Emerald Bay Road, prepared by Northwest Envirocon, Inc.
[VIEW DOCS]	<i>Response Requested - Reports</i>	Site Investigation	7/23/1993	7/23/1993	Report of Findings Additional Subsurface Investigation, Kmart Facility No. 9153, 1030 Tata Lane, prepared by Environmental Science & Engineering, Inc.
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/6/1993	7/6/1993	CLOSURE OF UNDERGROUND TANK CASE TAHOE ASPHALT
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/28/1993	1/28/1993	CLOSURE OF UST TANK CASE 6T0061A CHIEF AUTO PARTS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/19/1992	10/19/1992	SITE CLOSURE APPROVAL CHIEF AUTO PARTS
	<i>Response Requested - Other</i>	Other Report / Document	10/1/1992	10/1/1992	VERIFICATION SOIL SAMPLE RESULTS CHIEF AUTO PARTS
	<i>Response Requested - Other</i>	Other Report / Document	6/1/1992	6/1/1992	GROUNDWATER AND VAPOR EXTRACTION SYSTEM MONITORING CHIEF AUTO PARTS
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	1/10/1992	1/10/1992	Lawyer Letter Garfinkle Property SW
	<i>Response Requested - Other</i>	Other Report / Document	12/1/1991	12/1/1991	VAPOR EXTRACTION SYSTEM CHIEF AUTO PARTS
	<i>Response Requested - Other</i>	Other Report / Document	11/1/1991	11/1/1991	GROUNDWATER MONITORING REPORT CHIEF AUTO PARTS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/11/1991	10/11/1991	COMPLIANCE WITH CLEANUP AND ABATEMENT ORDER SOUTH Y SHOPS
	<i>Response Requested - Other</i>	Other Report / Document	10/8/1991	10/8/1991	QUARTERLY GW MONITORING REPORT SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	7/1/1991	7/1/1991	GROUNDWATER MONITORING REPORT CHIEF AUTO PARTS
	<i>Response Requested - Other</i>	Other Report / Document	4/1/1991	4/1/1991	QUARTERLY AIR MONITORING REPORT CHIEF AUTO PARTS

<u>LINK</u>	<u>ACTION TYPE</u>	<u>ACTION</u>	<u>ACTION DATE</u>	<u>RECEIVED / ISSUE DATE</u>	<u>TITLE / DESCRIPTION / COMMENTS</u>
	<i>Response Requested - Other</i>	Other Report / Document	4/1/1991	4/1/1991	QUARTERLY AIR MONITORING REPORT CHIEF AUTO PARTS
	<i>Response Requested - Other</i>	Other Report / Document	3/5/1991	3/5/1991	QUARTERLY GW MONITORING REPORT RESULTS SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	2/1/1991	2/1/1991	QUARTERLY GROUNDWATER MONITORING REPORT CHIEF AUTO PARTS
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	1/17/1991	1/17/1991	REQUEST FOR ADDITIONAL GW ANALYSES AT 1000 EMERALD BAY
	<i>Response Requested - Other</i>	Other Report / Document	11/8/1990	11/8/1990	PROBLEM ASSESSMENT REPORT FOR SHELL SERVICE
	<i>Response Requested - Other</i>	Other Report / Document	7/1/1990	7/1/1990	SOIL AND GROUNDWATER REMEDIATION PROPOSAL CHIEF AUTO PARTS
	<i>Response Requested - Other</i>	Other Report / Document	6/19/1990	6/19/1990	QUARTERLY GW MONITORING REPORT SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	6/1/1990	6/1/1990	QUARTERLY GROUNDWATER MONITORING REPORT CHIEF AUTO PARTS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	12/4/1989	12/4/1989	CLEANUP AND ABATEMENT ORDER SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	12/1/1989	12/1/1989	QUARTERLY GROUNDWATER MONITORING REPORT CHIEF AUTO PARTS
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	11/7/1989	11/7/1989	Lukins Letter Old Stage & Lukins Well Data 1989
[VIEW DOCS]	<i>Response Requested - Other</i>	Other Report / Document	10/4/1989	10/4/1989	Lukins Letter Supply Well Contamination
	<i>Response Requested - Other</i>	Other Report / Document	10/4/1989	10/4/1989	Lukins Letter Supply Well Contamination
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	7/15/1989	7/15/1989	ENFORCEMENT ACTION ENTRY FOR WDID 6A090081000 SOUTH Y SHOPS
	<i>Leak Action</i>	Leak Reported	7/2/1989		
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	6/8/1989	6/8/1989	CITY OF SOUTH LAKE TAHOE TO WB LETTER SOUTH Y SHOPS
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	5/4/1989	5/4/1989	CLEANUP AND ABATEMENT ORDER NO. 6-89-126 SOUTH Y SHOPS
	<i>Response Requested - Other</i>	Other Report / Document	4/1/1989	4/1/1989	SOIL CONTAMINATION WORKPLAN CHIEF AUTO PARTS
	<i>Response Requested - Other</i>	Other Report / Document	4/1/1989	4/1/1989	1989.04.01_SOIL CONTAMINATION WORKPLAN
	<i>Response Requested - Other</i>	Other Report / Document	3/13/1989	3/13/1989	REPORT SOIL BORINGS AND TESTS RESULTS FOR UST AMC JEEP RENAULT DEALERSHIP
	<i>Leak Action</i>	Leak Began	1/1/1989		
	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	10/14/1988	10/14/1988	SPRING 1989 REMOVAL OF RECENTLY DISCOVERED UST SOUTH Y SHELL
	<i>Response Requested - Other</i>	Other Report / Document	5/6/1988	5/6/1988	INFILTRATION REPORT CORRESPONDENCES TO WB SOUTH Y SHELL
[VIEW DOCS]	<i>Other Regulatory Actions</i>	Technical Correspondence / Assistance / Other	2/10/1986	2/10/1986	Waterboard Notes OldStage

LINK

ACTION TYPE

ACTION

ACTION DATE

RECEIVED / ISSUE DATE

TITLE / DESCRIPTION / COMMENTS

B. Environmental Data (ESI)

NO DATA

C. Site Maps / Documents

1. Site Maps (GEO_MAP), Boring Logs (GEO_BORE) and KML / KMZ Files

NO SITE MAP SUBMITTALS FOUND FOR THIS FACILITY.

2. Site Documents

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
TAHOE VALLEY ELEM PCE DATA	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	6/1/2009	
WATERBOARD LETTER 960 EMERALD BAY NO HISTORY OF SOLVENT USE	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	3/13/2008	
WATERBOARD LETTER REVIEW SOUTH Y FILES HOFFEY	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	9/18/2007	
WATERBOARD LETTER TAHOE VALLEY ELEMENTARY PCE DATA	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	6/28/2007	
TAHOE VALLEY ELEM PCE DATA	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	2/27/2006	
WATERBOARD LETTER PCE DATA 702 EMERALDBAY	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/19/2005	
WATERBOARD LETTER WATER ANALYSIS 1995 12TH ST	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/13/2005	
1995 12TH KITCHEN FAUCET LAB DATA	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/30/2005	
REPORT OF SUBSURFACE INVESTIGATION, KMART FACILITY NO. 9153, 1030 TATA LANE, PREPARED BY ENVIRONMENTAL SCIENCE & ENGINEERING, INC.	SITE INVESTIGATION	ABBY CAZIER (REGULATOR)	4/20/2005	
WATERBOARD LETTER 960 EMERALDBAY NO HISTORY OF SOLVENT USE	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	6/18/2004	
WATERBOARD LETTER REQUEST SEWER INFO STPUD	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	4/27/2004	
SEVEN SPRING LETTER INTEREST PCE CONTAMINATION SOUTH Y CENTER	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	4/9/2004	
TAHOE VALLEY ELEM PCE DATA	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/11/2003	
EDCEM TAHOE MONTESSORI ANALYTICAL DATA	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	7/16/2003	
EDCEM TAHOE MONTESSORI LETTER	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	7/16/2003	
WATERBOARD LETTER NFAR MONTGOMERY WARDS	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	1/24/2003	
ERRG FIGURES FROM GROUNDWATER ASSEMENT REPORT MONTGOMERY WARDS	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	11/14/2002	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>ERRG GW INVESTIGATION REPORT MONTGOMERY</u>	SITE INVESTIGATION	WILLIAM CHEN (REGULATOR)	11/1/2002	
<u>GHH REGIONAL PCE DATA COMPILATION SOUTH TAHOE Y AREA</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	10/24/2002	
<u>UNAUTHORIZED RELEASE FORM SOUTH Y PCE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/17/2002	
<u>WATERBOARD LETTER APPROVAL GROUNDWATER INVESTIGATION WORKPLAN MONTGOMERY WARDS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	9/16/2002	
<u>LAWYER LETTER RECONSIDER REQUEST FOR WP MONTGOMERY WARDS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/13/2002	
<u>LAWYER LETTER NOTICE TO SUBMIT WORKPLAN MONTGOMERY WARDS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	7/29/2002	
<u>WATERBOARD LETTER GROUNDWATER INVESTIGATION MONTGOMERY WARDS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/15/2002	
<u>LAWYER LETTER REQUEST EXTENSION FOR WP & SITE HISTORY NO RECORD OF SOLVENT USE MONTGOMERYWARDS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	5/31/2002	
<u>WATERBOARD LETTER DELINQUENT WORKPLAN MONTGOMERY WARDS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	4/29/2002	
<u>FACILITY ENFORCEMENT REPORT MONTGOMERY WARDS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	4/15/2002	
<u>WATERBOARD LETTER NOTICE TO SUBMIT GROUNDWATER INVESTIGATION WORKPLAN MONTGOMERY WARDS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	3/4/2002	
<u>WATERBOARD LETTER 780 ROGERS ANALYTICALDATA</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/8/2001	
<u>FAX LUKINS UNABLE TO SAMPLE OLD STAGE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/19/2001	
<u>WATERBOARD LETTER CAA FUNDS SAMPLE OLD STAGE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	5/10/2001	
<u>WATERBOARD LETTER REQUEST TO SAMPLE OLD STAGE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	4/25/2001	
<u>LUKINS LETTER MTBE & PCE DATA</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	4/24/2001	
<u>RESOURCE CONCEPTS LETTER PCE RESULTS GARFINKLE PROPERTY</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	2/14/2001	
<u>WATERBOARD VIOLATION REPORT Belpac</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	1/31/2001	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>CORRESPONDENCE WB TO CHARLES HAMILTON</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/3/2000	
<u>APEX GROUNDWATER INVESTIGATION REPORT BELPAC</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	9/6/2000	
<u>APEX ADDENDUM WORKPLAN GROUNDWATER INVESTIGATION BELPAC</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	5/31/2000	
<u>WATERBOARD LETTER WORKPLAN APPROVAL BELPAC</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	5/23/2000	
<u>APEX WORKPLAN GROUNDWATER INVESTIGATION BELPAC</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	5/3/2000	
<u>NFAR SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	3/21/2000	
<u>SECOR SITE CHARACTERIZATION REPORT SHEHADI MOTORS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	2/9/2000	
<u>WATERBOARD LETTER RESPONSE NEEDED GROUNDWATER INVESTIGATION BELPAC</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	2/9/2000	
<u>WATERBOARD LETTER NRFA SOUTHSHORE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	1/27/2000	
<u>GRABOWSKY LETTER CHEMICAL USE ANCHOR PRINTING TENANCY BELPAC</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/24/2000	
<u>WATERBOARD LETTER NOTICE OF DELINQUENT GROUNDWATER INVESTIGATION REPORT SHEHADI</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	1/13/2000	
<u>WATERBOARD LETTER NOTICE TO SUBMIT GROUNDWATER INVESTIGATION WORKPLAN BELPAC</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	12/22/1999	
<u>WATERBOARD LETTER WORKPLAN APPROVAL BAKER AUTOMOTIVE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	12/21/1999	
<u>FACILITY VIOLATION REPORT BAKER AUTOMOTIVE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/10/1999	
<u>EDCEH APPROVAL INFILTRATION TRENCH SOIL & GROUNDWATER INVESTIGATION WORKPLAN SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/10/1999	
<u>SECOR REPORT OF FINDINGS 1,2-DCE GW INVESTIGATION SOUTH SHORE MOTORS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/10/1999	
<u>WATERBOARD LETTER NOTICE OF INTENDED ENFORCEMENT ACTION BAKER AUTOMOTIVE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/15/1999	
<u>FACILITY ENFORCEMENT REPORT BAKER AUTOMOTIVE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	11/15/1999	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WATERBOARD LETTER APPROVAL GROUNDWATER INVESTIGATION WORKPLAN SHEHADI</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/9/1999	
<u>SECOR MAP & LAB REPORT SOUTH SHORE MOTORS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/29/1999	
<u>SECOR MEMO ADDENDUM WORKPLAN SOIL REMOVAL SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/27/1999	
<u>EDCEH LETTER COMMENTS PB & CR SOIL REMOVAL WORKPLAN SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/26/1999	
<u>2111 DUNLAP PCE DATA</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/22/1999	
<u>WATERBOARD LETTER NOTICE OF DELINQUENT WP BAKER AUTOMOTIVE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	9/9/1999	
<u>WATERBOARD BOARD MEETING STATUS REPORT SOUTH Y PCE INVESTIGATION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	9/5/1999	
<u>SECOR WORKPLAN GROUNDWATER INVESTIGATION 1,2-DCA SOUTHSORE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/31/1999	
<u>WATERBOARD FACILITY VIOLATION REPORT BAKER AUTOMOTIVE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	8/15/1999	
<u>WATERBOARD LETTER SOLVENT USE WELCOMES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	8/9/1999	
<u>WATERBOARD LETTER COMMENTS GROUNDWATER INVESTIGATION REPORT SOUTH SHORE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/26/1999	
<u>WATERBOARD LETTER COMMENTS GROUNDWATER INVESTIGATION SHEHADI</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/22/1999	
<u>EDCEH LETTER WATERBOARD INFILTRATION TRENCH CONTAMINATION SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	7/16/1999	
<u>EDCEH LETTER INFILTRATION TRENCH INVESTIGATION WORKPLAN SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	7/16/1999	
<u>WATERBOARD LETTER NFAR HIGH SCHOOL</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/13/1999	
<u>WATERBOARD LETTER DELINQUENT SOLVENT USE REQUEST BELPAC</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/13/1999	
<u>LAWYER LETTER WELCOMES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	7/5/1999	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WATERBOARD LETTER NOTICE TO SUBMIT WORKPLAN BAKER AUTOMOTIVE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	6/28/1999	
<u>SECOR GROUNDWATER INVESTIGATION REPORT SOUTH SHORE & SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	6/25/1999	
<u>WATERBOARD LETTER DELINQUENT WORKPLAN WELCOMES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	6/24/1999	
<u>APEX RESULT REPORT GROUNDWATER INVESTIGATION HIGH SCHOOL</u>	CORRESPONDENCE	WILLIAM CHEN (REGULATOR)	5/26/1999	
<u>SECOR MAP & LABREPORT SOUTH SHORE & SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	5/17/1999	
<u>WATERBOARD LETTER PRIVATE WELL PCE RESULTS CRYSTAL RANGE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	4/16/1999	
<u>TAHOE VALLEY ELEM PCE DATA</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	4/16/1999	
<u>WATERBOARD LETTER DISCOLSURE OF SOLVENT USE 918 920 934 ELOISE(SOUTHSIDEAUTO)</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	3/31/1999	
<u>WATERBOARD LETTER NFAR STAGEBUS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	3/4/1999	
<u>97-98 SUMMARY RESULTS SOUTH Y PCE INVESTIGATIONS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	2/25/1999	
<u>WATERBOARD LETTER COMMENTS GROUNDWATER INVESTIGATION WORKPLAN HIGHSCHOOL</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	2/22/1999	
<u>PHASE THREE LETTER GROUNDWATER INVESTIGATION REPORT SUBMITTAL STAGEBUS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	2/22/1999	
<u>PHASE THREE ENVIRO GW INVESITGATION STAGE BUS FACILITY</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	2/8/1999	
<u>WATERBOARD LETTER WORKPLAN NOT REQUIRED TERRY LIBBON</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	1/22/1999	
<u>SECOR WP GROUNDWATER INVESTIGATION SOUTH SHORE & SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/20/1999	
<u>TERRY LIBBON LETTER RESPONSE</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/12/1999	
<u>NOTICE OF DELINQUENT WORKPLAN TERRY LIBBON MOTORS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/15/1998	
<u>WATERBOARD LETTER WORKPLAN APPROVAL STAGEBUS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	12/9/1998	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WATERBOARD LETTER EXTENSION APPROVAL GROUNDWATER WORKPLAN SUBMITTAL SOUTH SHORE & SHEHADI</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	12/8/1998	
<u>WATERBOARD LETTER REQUEST GROUNDWATER INVESTIGATION WELCOMES</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	11/24/1998	
<u>PHASE THREE LETTER WORKPLAN SUBMITAL STAGEBUS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	11/18/1998	
<u>SHEHADI LETTER REQUEST EXTENSION GROUNDWATER INVESTIGATION WORKPLAN SOUTH SHORE & SHEHADI</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	11/17/1998	
<u>CITY OF SLT LETTER WORKPLAN STAGEBUS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/30/1998	
<u>WATERBOARD LETTER REQUEST FOR WORKPLAN STAGEBUS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/23/1998	
<u>WATERBOARD LETTER NOTICE TO SUBMIT GROUNDWATER INVESTIGATION WORKPLAN SHEHAD</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/21/1998	
<u>WATERBOARD LETTER NOTICE TO SUBMIT GROUNDWATER INVESTIGATION WORKPLAN TERRY LIBBON MOTORS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/21/1998	
<u>WATERBOARD LETTER NOTICE TO SUBMIT GROUNDWATER INVESTIGATION WORKPLAN SOUTH SHORE MOTORS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	10/21/1998	
<u>STPUD LETTER SEWER OBSERVATIONS STAGEBUS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/20/1998	
<u>WATERBOARD LETTER TAHOE VALLEY TOWNHOMES NOT SUSPECTED SOURCE</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	8/13/1998	
<u>WATERBOARD FINAL INVOICE STPUD GROUNDWATER INVESTIGATION</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/20/1998	
<u>STAGE BUS PROPERTY SLT CORRESPONDENCE WB TO STAGE BUS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/17/1998	
<u>WATERBOARD LETTER SEWER LATERAL PCE DETECTION STAGEBUS</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/17/1998	

<u>TITLE</u>	<u>TYPE</u>	<u>SUBMITTED BY</u>	<u>DOCUMENT DATE</u>	<u>SIZE</u>
<u>WATERBOARD LETTER REQUEST SOLVENT USE HISTORY GALICIA</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/15/1998	
<u>WATERBOARD LETTER REQUEST SOLVENT USE CAMPORA</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/15/1998	
<u>WATERBOARD LETTER WELCOMES REQUEST SOLVENT USE HISTORY</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	7/6/1998	
<u>LAWYER LETTER ALLOWING SITE ACCESS WELCOMES</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	3/5/1998	
<u>WATERBOARD LETTER ACCESS REQUEST WELCOMES AUTOBODY</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	2/23/1998	
<u>SOUTH Y GROUNDWATER STUDY SAMPLING RESULTS PREPARED BY AGRA EARTH & ENVIRONMENT</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	ABBY CAZIER (REGULATOR)	1/27/1998	
<u>STPUDRESOLUTIONNO.2662</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	12/18/1997	
<u>BOARD MEETING AGENDA LETTERS</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/25/1997	
<u>AGENCY AGREEMENT SUPPORT PCE INVESTIGATION</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	8/20/1997	
<u>SUMMARIZES INVESTIGATIONS PERFORMED IN THE SOUTH "Y" AREA FROM 1992 THROUGH 1995 WHICH INCLUDED PASSIVE SOIL GAS SAMPLING USING PETREX TUBES AND SEWER SAMPLING TO IDENTIFY POTENTIAL SOURCES OF CONTAMINATION. INCLUDES THE RATIONALE FOR ADDITIONAL FUNDING TO CONTINUE INVESTIGATIONS TO IDENTIFY SOURCE(S).</u>	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	ABBY CAZIER (REGULATOR)	1/5/1996	
<u>SOIL SAMPLE LOCATION MAP AND SUMMARY OF ANALYTICAL RESULTS FOR SOIL SAMPLES, U-HAUL UST EXCAVATION, 1105 EMERALD BAY ROAD, PREPARED BY NORTHWEST ENVIROCON, INC.</u>	OTHER REPORT / DOCUMENT	ABBY CAZIER (REGULATOR)	8/30/1994	
<u>REPORT OF FINDINGS ADDITIONAL SUBSURFACE INVESTIGATION, KMART FACILITY NO. 9153, 1030 TATA LANE, PREPARED BY ENVIRONMENTAL SCIENCE & ENGINEERING, INC.</u>	SITE INVESTIGATION	ABBY CAZIER (REGULATOR)	7/23/1993	
<u>LAWYER LETTER GARFINKLE PROPERTY SW</u>	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	1/10/1992	

TITLE	TYPE	SUBMITTED BY	DOCUMENT DATE	SIZE
REQUEST FOR ADDITIONAL GW ANALYSES AT 1000 EMERALD BAY	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	1/17/1991	
LUKINS LETTER OLD STAGE & LUKINS WELL DATA 1989	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	11/7/1989	
LUKINS LETTER SUPPLY WELL CONTAMINATION	OTHER REPORT / DOCUMENT	WILLIAM CHEN (REGULATOR)	10/4/1989	
WATERBOARD NOTES OLDSTAGE	TECHNICAL CORRESPONDENCE / ASSISTANCE / OTHER	WILLIAM CHEN (REGULATOR)	2/10/1986	

3. Petition Documents

NO PETITION DOCUMENT SUBMITTALS FOUND FOR THIS FACILITY.

4. Monitoring Reports

NO MONITORING REPORT SUBMITTALS FOUND FOR THIS FACILITY.

D. Community Involvement

1. Environmental Justice

[DWR 2016 DISADVANTAGED COMMUNITY DESIGNATION - INFO](#)

NONE

[CALENVIROSCREEN 3.0 SCORE - INFO](#)

[Percentile Range: 1-5% \(lowest scores\)](#)

[CALENVIROSCREEN 4.0 SCORE - INFO](#)

[Percentile Range: 40-45%](#)

2. Community Involvement Documents

NO COMMUNITY INVOLVEMENT DOCUMENTS HAVE BEEN UPLOADED