

November 20, 2014

Ms. Lauri Kemper, P.E.  
Lahonton Regional Water Quality Control Board  
2501 Lake Tahoe Boulevard  
South Lake Tahoe, California 96150

Subject: Supplemental Site Investigation Work Plan  
CG Roxane, LLC  
Olancha, California

Dear Ms. Kemper:

Geosyntec Consultants (Geosyntec), on behalf of CG Roxane, LLC (CGR), is providing the following *Supplemental Investigation Work Plan*, to address the conditional approval of the *Site Investigation Work Plan* (Work Plan), dated October 17, 2014, for the CGR bottling facility (Site) in Olancha, California. The Lahonton Regional Water Quality Control Board (RWQCB) letter dated November 12, 2014 accepted the scope of work as proposed in the Work Plan with conditions. The following letter will address the conditions as stated in the RWQCB letter.

**RWQCB Comment #1:**

*The Work Plan provides no response to Order Requirement B.4:*

*“Proposed methodologies/activities to provide...information regarding past and current waste (solid and liquid) discharges to onsite facilities/sites other than the three existing pond facilities.”*

**Response:**

The solid or liquid discharges that currently and historically have occurred at the Site, were described in the *Facility Waste Generation and Discharge Systems Report*, dated October 21, 2014. To the extent that there are past or current waste discharges to onsite facilities/sites other than the three existing pond facilities, it is anticipated that the proposed investigative methodologies addressed in the Work Plan will be capable of detecting significant impacts to water quality, if present. It is our opinion that additional investigation, beyond that proposed, is not necessary based on our understanding of the current and historical solid or liquid discharges from the Site. An exception is the additional boring requested by the RWQCB and discussed in Comment 3 below.

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**RWQCB Comment #2:**

*“The Work Plan, in part, currently includes sampling and analyses of discharge streams going to the East Pond and the Fire Pond. The Work Plan does not include sampling and analyses of the discharge stream going to the Arsenic Pond. Include sampling and analyses of the discharge stream going to the Arsenic Pond as part of Phase 1.”*

**Response:**

A grab sample of the discharge stream going to the Arsenic Pond (AP) will be added to the sampling plan as part of the Phase 1 investigation. Discharges to the AP occur infrequently as necessary to backwash (regenerate) the manganese sand arsenic filters. The discharge stream to the AP will be sampled when the next filter regeneration backwash is required. It is anticipated that the next backwash will occur in November or December 2014.

**RWQCB Comment #3:**

*“Include one additional direct-push/hydropunch boring at the Fire Pond Outfall location, and conduct the same sampling and analyses for the additional boring that is identified for the nine direct-push/hydropunch borings already proposed.”*

**Response:**

An additional boring will be completed near the Fire Pond outfall pending access agreement approval. The property downgradient of the outfall is not owned by CGR. Access will be requested to install the boring. The boring and sample collection methodology and laboratory analyses will be the same as other borings proposed for Phase 1, if access is approved.

**RWQCB Comment #4:**

*“Notify Water Board staff in South Lake Tahoe (Lisa Scorable) and Victorville (Patrice Copeland) offices a minimum of 72 hours prior to commencing Phase 1 field investigation activities.”*

**Response:**

The RWQCB will be notified as requested prior to initiating Phase 1 drilling activities.

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**RWQCB Comment #5:**

*“All necessary permits and clearances shall be obtained prior to initiation of field drilling activities.”*

**Response:**

All necessary permits will be obtained prior to commencing Phase 1 drilling.

If you have any questions please call us at 805-897-3800.

Sincerely,

**Geosyntec Consultants, Inc.**



Ryan Smith, P.G.  
Project Geologist



Mark Grivetti, P.G., CEG, CHg.  
Principal Hydrogeologist

cc: Mr. Page Beykpour, CGR  
Mr. Sebastien Guyard, CGR

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