

Lahontan Regional Water Quality Control Board

December 8, 2014

The Thomas E. Erickson Trust
Attn: Thomas E. Erickson
1468 Ashbrook Circle
Medford, OR 97501

Mohammad Ahmad
Tahoe Tom's Gas Station
4029 Lake Tahoe Blvd
South Lake Tahoe, CA 96150

Lake Tahoe Investments LLC
Attn: Raman Singh
4029 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

AMENDED CLEANUP AND ABATEMENT ORDER NO. R6T-2014-0079-A1, TAHOE TOM'S GAS STATION, 4029 LAKE TAHOE BOULEVARD, SOUTH LAKE TAHOE, EL DORADO COUNTY

I am amending directives in Cleanup and Abatement Order (CAO) No. R6T-2014-0079 for the Tahoe Tom's Gas Station in South Lake Tahoe in response to your November 1, 2014 request. The amendments allow you to cease operating the onsite remediation system during this winter and reduce the frequency of groundwater sampling at specific locations.

CAO R6T-2014-0079

CAO No. R6T-2014-0079, issued on September 26, 2014, in part, requires the Thomas E. Erickson Trust, Mohammad Ahmad, and Lake Tahoe Investments, LLC to comply with the following directives:

Order 4.1. Within 72 hours of the date of this Order, start to operate a remediation system that has the ability to contain petroleum hydrocarbons from migration in groundwater from leaving the Facility property.

Order 4.2. Within 21 days from the date of this Order, implement interim corrective actions at monitoring well MW-16M that have the ability to contain petroleum hydrocarbons from migration in groundwater from leaving that location...

Order 5.2. By September 30, 2014, and quarterly thereafter, conduct groundwater sampling at these on-site vapor and extraction well locations: MW-3, VE-12, RW-1, RW-9A, RW-10. In addition, conduct groundwater sampling at these off-site...locations: MW-4, MW-6, MW-9, MW-10, MW-15D, MW-16M, MW-17, MW-17M, RW-7B...Also collect a water sample from the Best Western Station House well...and a sample from the Alpenrose Motel.

Request for CAO Modifications

On November 1, 2014, the Lahontan Regional Water Quality Control Board received the document, *Third Quarter 2014 Groundwater Monitoring Report* (Report), from your consultant LRM Consulting. The Report states that a mobile remediation system consisting of dual phase extraction has operated at the site under high rates since July 23, 2014. The cumulative hydrocarbon mass removed by the system since start-up is calculated at 848 pounds as of late October. System sampling shows the hydrocarbon removal rate has significantly decreased from a high of 17.8 pounds per day to less than 2 pounds per day in October 2014. Additionally, LRM has been implementing interim remedial actions at MW-16M with periodic injections of the compound RegenOx which oxidizes hydrocarbons in groundwater.

The Report also contains monitoring data from the October 2014 sampling event. Monitoring results show that benzene was detected in one onsite monitoring well and total petroleum hydrocarbons (TPH) were detected in two onsite monitoring wells. The detected concentrations are up to three orders of magnitude less in concentration than those detected in water samples collected in April 2014. Off-site monitoring results show MTBE up to 7 ppb in three locations: MW-6, MW-16M, and the Mark Twain Lodge. MTBE concentrations reported for October 2014 have dropped one order of magnitude since the April 2014 sampling event.

Based upon the reductions in hydrocarbon concentrations in water samples from onsite and off-site monitoring locations, LRM requests to temporarily cease operating the onsite remediation system during winter months, cease interim remedial actions at MW-16M, and reduce the quarterly sampling frequency of monitoring locations required in CAO No. R6T-2014-0079.

CAO Amendments

I am pleased to see that the remedial actions have had a positive effect in reducing petroleum hydrocarbons in groundwater. I am therefore conditionally approving the request to cease operating the onsite remediation system and implementing interim action at MW-16M:


- Order 4.1 is amended to allow you to turn off the dual phase extraction system for the months of December 2014, January and February 2015. Beginning with fourth quarter 2014, if monitoring results show an order of magnitude increase in hydrocarbon concentrations at one or more onsite sampling locations when compared to the results of the October 2014 monitoring event, the onsite remediation system must be turned back on no later than March 6, 2015, or within 30 days of the date on the laboratory report in subsequent quarters.
- Order 4.2 is amended to allow you to cease interim remedial actions at MW-16M. If monitoring results show an order of magnitude increase in hydrocarbon concentrations at MW-16M from this date forward when compared to the results of the October 2014 monitoring event, interim remedial actions must resume within 30 days of the date on the laboratory report.

I am also modifying the monitoring program required in Order 5.2 to reflect the following:

- Beginning fourth quarter 2014, quarterly groundwater sampling must be conducted at MW-6, MW-16M, RW-10, VE-13, and the Mark Twain Lodge.
- Beginning in first quarter 2015, semi-annual sampling must be conducted at MW-3, MW-4, MW-6, MW-9, MW-10, MW-15D, MW-16M, MW-17M, RW-1, RW-4, RW-7, RW-9A. A water sample from the Best Western Station House well and the Alpenrose Motel well must also be collected.

Quarterly monitoring reports shall continue to be submitted to the Lahontan Water Board pursuant to Order 5.3., 45 days following the end of the previous quarter, and contain all items listed within Order 5.3.

If you have any questions or wish to discuss this matter further, you may contact Lisa Dernbach at (530) 542-5436 or Ldernbach@waterboards.ca.gov.


PATTY Z. KOUYOUMDJIAN
EXECUTIVE OFFICER

cc: Tahoe Tom's Gas Station Mail List

LSD/ma/T: R6T-2014-0079-A01 Tahoe Toms Modified CAO 12-14
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