

Central Coast Regional Water Quality Control Board

June 3, 2016

Guy W. Savage
Assistant County Administrative Officer
County Government Center
Room D430
San Luis Obispo, CA 93408
Email: gsavage@co.slo.ca.us

Dear Mr. Savage:

SITE CLEANUP PROGRAM: SAN LUIS OBISPO COUNTY REGIONAL AIRPORT, 903 AIRPORT DRIVE, SAN LUIS OBISPO, SAN LUIS OBISPO COUNTY – RESPONSE TO SAN LUIS OBISPO COUNTY REVISED WORKPLAN SUBMITTALS FOR THE INVESTIGATION OF TRICHLOROETHYLENE ON THE AIRPORT PROPERTY

Central Coast Regional Water Quality Control Board (Water Board) staff reviewed San Luis Obispo County's (County) May 27, 2016 Revised Groundwater Investigation Workplan (Revised Groundwater Workplan), and Revised Soil Gas Investigation Workplan (Revised Soil Gas Workplan), prepared by Roux Associates, Inc. (Roux) on behalf of the County for the San Luis Obispo County Regional Airport (Airport). The County submitted the revised workplans in response to our May 13, 2016 comment letter¹ and subsequent discussion during a May 23, 2016 meeting between the County, Roux, and Water Board staff. The Revised Groundwater Workplan and the Revised Soil Gas Workplan adequately addressed the conditions included in our May 13, 2016 letter provided the County complies with the following additional comments and additional requirements included in this letter. Water Board staff also includes an updated compliance summary in response to some additional information we have received to date.

WATER BOARD STAFF COMMENTS AND CONDITIONS FOR REVISED WORKPLANS

The following includes Water Board staff comments and requirements for the Revised Groundwater Workplan and Revised Soil Gas Workplan:

Revised Groundwater Workplan

- 1) Section 1.0, Page 5. After the bulleted items, the County stated that the search for aerial photography is not complete and the copies of photographs have not been formally rectified. During our May 23, 2016 meeting, the County committed to searching for and providing high resolution copies to Water Board staff of one or two key aerial photographs (if found). The County also indicated that they would rectify the aerials to an appropriate coordinate system. As such, we require the County to provide better resolution copies of aerial photographs from 1956 and 1972. Submit the aerial photographs to the Water Board via email (or equivalent)

¹ The May 13, 2016 Water Board comment letter is available at:
http://www.waterboards.ca.gov/centralcoast/water_issues/hot_topics/tce_pce_info/tce_pce_index.shtml

immediately upon receipt but **no later than June 30, 2016** as originally required in our May 13, 2016 letter for these aerial photographs or provide a statement that an exhaustive search did not result in finding better copies than the copies that the County has already submitted.

- 2) Section 4.1.2 Phase II- Proof of Concept. For Phase II, the County proposes to drill approximately 100 feet below ground surface (bgs) to characterize the lithology and collect groundwater samples. As stated in our previous correspondence, Water Board staff requires the County to characterize the full thickness of the alluvium and the upper portion of weathered bedrock. We reiterate that the County may need to drill the sonic boring and the collocated cone penetrometer test boring to a depth greater than 100 feet bgs (depending on what is observed in the field). The County is required to be prepared to drill deeper to prevent delay in the characterization of the full thickness of the alluvium and the upper portion of weathered bedrock.
- 3) The Revised Groundwater Workplan includes a revised schedule for implementing the scope of work. Due to the County's requirement for a four week contracting process to select a contractor, the County is not able to start field work until a contractor is selected and this results in an approximate two week delay in the schedule compared to the original proposed schedule included in the April 15, 2016 Groundwater Workplan. Additionally, because of the additional security and safety requirements and due to access considerations necessary for working on an active airport property, the planning and execution of field work takes longer than a typical investigation. Therefore, the County is required to submit the Groundwater Report on **October 10, 2016** instead of September 26, 2016 as originally required in our May 13, 2016 letter. However, as discussed during our May 23, 2016 meeting, Water Board staff requests that the County transmit the preliminary groundwater analytical results as soon as they are available. The groundwater results are very important in determining whether the airport property is the source of the TCE that is currently detected in private wells in the Buckley Road area. Based on the revised schedule, the County will submit preliminary groundwater results on August 10, 2016. Therefore, we require the County to submit the initial preliminary groundwater results no later than **August 10, 2016** and all of the preliminary groundwater results no later than **September 12, 2016** instead of August 31, 2016 as originally required in our May 13, 2016 letter.

Revised Soil Gas Workplan

- 1) Section 4.1.3 Phase II Soil Gas Sampling at the end of Former Runway 28 and Figure 7A. During the May 23, 2016 meeting, we discussed that access at the end of Former Runway 28 is difficult because of airport operations and safety restrictions to do work near runways. In our May 23, 2016 meeting, Water Board staff provided preliminary concurrence on the proposed locations for six passive soil gas samples at the former end of the runway. After our review of Figure 7A, we require that the County move the southern-most proposed location approximately 400 feet in a northwest direction and as close to the runway as allowed by access restrictions. Based on our understanding of groundwater flow directions, this revised location is a more optimal location to evaluate potential TCE releases in soil gas relative to presumed groundwater flow direction and the disturbed soil area observed in the 1956 aerial photograph. The County is required to submit the revised Figure 7A as soon as possible.
- 2) The Revised Soil Gas Workplan includes a revised schedule to implement the scope of work. As explained in item 3 above, the new schedule has start dates for the field work and reporting of the results approximately two weeks later than the original proposed schedule. Water Board staff concurs with the revised schedule and requires the County to submit a Soil Gas Report no later than **September 20, 2016** instead of September 1, 2016 as originally required in our May 13, 2016 letter. However, we request that the County transmit the preliminary soil gas results to Water Board staff as soon as they are available no later than **August 26, 2016**.

WATER BOARD STAFF COMPLIANCE SUMMARY

The attached table provides an update of Water Board staff requirements to date and the current status of your compliance with those requirements.

LEGAL REQUIREMENTS

The 13267 required due dates in the May 13, 2016 letter no longer apply due to the revised schedule included in the Revised Groundwater Workplan and the Revised Soil Gas Workplan. The due dates included herein are amendments to the due dates required in our May 13, 2016 letter. The amended due dates include the following:

- 1) Submittal of the initial preliminary groundwater results by **August 10, 2016** and all of the preliminary groundwater results no later than **September 12, 2016**,
- 2) Submittal of the Groundwater Report on **October 10, 2016**,
- 3) Submittal of the preliminary soil gas results no later than **August 26, 2016**, and
- 4) Submittal of the Soil Gas Report no later than **September 20, 2016**.

The requirements for the preliminary groundwater and soil gas results and the reports summarizing the findings of the Revised Groundwater Workplan and the Revised Soil Gas Workplan as modified in this letter are made pursuant to Section 13267 of the California Water Code. Pursuant to Section 13268 of the California Water Code, a violation of a Water Code Section 13267 requirement may subject you to civil liability of up to \$1,000 per day for each day in which the violation occurs.

The Central Coast Water Board needs the required information to determine if past and/or current airport operations are a source of pollution for the TCE detected in groundwater in the Buckley Road area and to delineate the extent of TCE impacts in soil and groundwater beneath the County Airport property. The County Airport is required to submit this information because it is the current property owner. The evidence supporting this requirement is described above.

Any person affected by this action of the Central Coast Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The petition must be received by the State Water Board, Office of Chief Counsel, P. O. Box 100, Sacramento, 95812 within 30 days of the date of this order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

If you have questions about this letter, please contact **Dean Thomas at (805) 549-3690 or Dean.Thomas@waterboards.ca.gov** or Thea Tryon at (805) 542-4776.

Sincerely,

Michael Thomas
Assistant Executive Officer

Attachments: Water Board Staff Requirements Summary

cc:

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CR# none
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Water Board Requirements Summary Table

Water Board Staff Requirement	Date of Requirement	Status
<p>Information on current and former owners, tenants, and operators of properties within the area now controlled by the San Luis Obispo County Airport, along with descriptions of present and historic businesses and the locations where they operated. <i>In our February 26, 2016 letter, Water Board staff specified that the County must provide details on the location where current and former aircraft or other operations used, stored, and disposed of TCE or other wastes, and maintained or repaired aircraft, during the period between when the land was first developed and 1998.</i></p>	<p>11/23/2015</p>	<p>The County has provided some information to address this requirement in their April 15, 2016 submittal. The County provided various records on current and former tenants and operators on April 15, 2016, however, there is no report “describing present and historic businesses and the locations where they operated”. The County only provided lists of tenant names. The Workplan(s) included documents about former military use but Water Board staff already had those files inhouse. The County has also provided copies of hand written documents from 1985 that listed chemicals used at the Airport, with one chemical spelled as “triethalene solvent,” which sounds similar to trichloroethylene (TCE), but is spelled similar to “triethylene glycol.” Water Board staff believes it was more than likely TCE that they were referring to. In their April 15 letter, the County indicated that it has performed an “in-depth search of County documents and has not found any records that indicate that the County used, stored, or disposed TCE or other wastes on our Buckley Road property.” The County offered to provide electronic copies of all the other documents found during its search, but suggested that it would be easier for Water Board staff to review the paper copies due to the large amount of files. Water Board staff reviewed those documents, with no further requests. County fulfilled this requirement.</p>
<p>An estimate of quantity of TCE (or other solvents) used at each of the identified properties (if applicable).</p>	<p>11/23/2015</p>	<p>Not applicable with respect to TCE because County indicated that there are no TCE records uncovered. Some estimates were provided for other solvents. County fulfilled this requirement on May 23, 2016 because Mr. Guy Savage indicated that the County performed an exhaustive search and could not find any records of TCE use.</p>

Water Board Requirements Summary Table

Details on the location where current and former aircraft or other operations used, stored, or disposed of TCE (if applicable).	11/23/2015	County maintains (Jan 20 and April 15 submittals) that they have found no evidence of TCE use at their property (Airport); however, one chemical inventory list may indicate use of TCE but the spelling is unclear whether it was triethylene glycol or trichloroethene. County fulfilled this requirement on May 23, 2016 because Mr. Guy Savage indicated that the County performed an exhaustive search and could not find records of TCE use.
Copies of all environmental reports pertaining to operations at the airport, including, but not limited to records of waste disposal.	11/23/2015	County submitted several environmental reports on January 20; others were submitted on April 15. Water Board staff found one 1991 "Hazardous Materials Business Plan and Emergency Response Procedures" for EG&G Power Systems formerly located at 1 Aerovista Park. County fulfilled this requirement on May 23, 2016 because Mr. Guy Savage indicated that the County performed an exhaustive search and could not find records of waste disposal.
Information on any supply wells and monitoring wells located on the airport property, including well construction details and laboratory analytical results.	11/23/2015	Partially completed; however, submitted information is already in our files. The County submitted additional logs by May 13. County has fulfilled this requirement; however, County will provide copies of well construction logs obtained from DWR if different from those already provided.
Current and historical aerial photos and surface drainage maps for the runway and associated industrial buildings. <i>In our February 26, 2016 letter, Water Board staff clarified that this should include aerial photos for the portion of the airport's history as a military facility, and for periods in the 1950s through the ensuing decades to the present.</i>	11/23/2015	Substantively completed on April 15 but this letter requires the County to submit additional aerial photos and surface drainage maps (if any are found) before commencing field work. County has substantively fulfilled this requirement but committed to providing copies by June 30 of higher resolution aerial photos from 1956 and 1972 (if found) and ortho-rectifying worplan figures, as appropriate. If not, this requirement is fulfilled provided the County provides a written statement that an exhaustive search was not successful in identifying higher resolution aerals for 1956 and 1972.

Water Board Requirements Summary Table

<p>Provide one of the following:</p> <ul style="list-style-type: none"> • A statement that data provided above are sufficient to show that TCE impacts in the Buckley Road area are not the result of discharges from the airport or • A work plan to perform an environmental investigation along Buckley Road to investigate whether TCE in groundwater is from the airport. Proposed collected data shall include, but is not limited to, groundwater grab samples and sediment/soil samples at locations where surface water formerly drained and currently drains from the airport area. 	11/23/2015	Completed on April 15. County continues to state (Jan 20 and April 15 submittals) that they have found no evidence for TCE use at the Airport. County fulfilled this requirement.
Submit all available Hazardous Waste Manifest Plans	2/26/2016	County submitted several environmental reports on January 20; others were submitted on April 15. Water Board staff found one 1991 "Hazardous Materials Business Plan and Emergency Response Procedures" for EG&G Power Systems formerly located at 1 Aerovista Park. County fulfilled this requirement on May 23, 2016 because Mr. Guy Savage indicated that the County performed an exhaustive search and could not find additional plans.
Proposal for collecting groundwater samples along Buckley Road (these can be grab groundwater samples) and analyze for TCE and related volatile organic compounds (VOCs). SLO Airport must collect groundwater samples south of runway 29 and 25 at locations that are spaced close enough to fully characterize the width, depth, and maximum concentrations of TCE currently identified along the Buckley Road area. The SLO Airport must collect a sufficient number of soil samples to characterize the lithology, especially any potentially impacted water bearing units in the borings used to collect groundwater samples. SLO Airport must also use a photoionization detector (PID) to screen soil from the boring for VOCs and record this on the boring log.	2/26/2016	Completed April 15, 2016.

Water Board Requirements Summary Table

Proposal for soil gas sampling locations and methods to evaluate potential sources of TCE introduced into the subsurface from historical and current stormwater drainage pathways and storm drain locations along Buckley Road.	2/26/2016	Completed April 15, 2016.
Proposal for locations to conduct soil gas sampling for TCE and related VOC analyses in the former leach field area located east of runway 25 (as discussed above). The proposal will include collection of groundwater samples for TCE and related VOC laboratory analyses beneath locations having elevated TCE in soil gas samples. SLO Airport is required to laterally and vertically delineate TCE in soil gas and groundwater in all areas where TCE is present. The workplan must specify criteria/rationale for stepping out to define the lateral extent of TCE on the airport property.	2/26/2016	Completed April 15, 2016.
Proposal for conducting soil gas sampling for TCE and related VOC analyses at other potential disposal areas. The SLO Airport must review historical aerial photographs, disposal records, and operational records for other potential disposal locations (i.e., leach fields) and incorporate additional proposed soil gas sampling locations, as appropriate.	2/26/2016	Completed April 15, 2016.
Include a detailed schedule for the environmental investigations proposed in the workplan.	2/26/2016	Completed April 15, 2016.
Provide names and contact information for employees who are/were involved in waste disposal operations at the SLO Airport prior to 1998.	2/26/2016	Names were provided on April 15 for County Airport personnel and positions they held, but no contact information. During the May 23 meeting, Water Board staff said to the County that for protection of privacy, contact information is not required. However, the County offered to provide names of former Airport managers not currently deceased.
Provide a complete copy of the Airport map that shows a "Disposal Area No. 2" near Santa Fe Road in a partial copy of a map associated with various lease agreements	Informal	Provide the completed map or a written statement that The County has performed an exhaustive search but has not found the requested map.