

County of San Luis Obispo

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(via email)

May 27, 2016

Subject: County response to May 13, 2016 memorandum regarding information requests and modifications to proposed soil gas and groundwater investigation work plans.

Mr. Robertson,

As you may know, representatives from the County met with Central Coast Regional Water Quality Control Board (RWQCB) staff on Monday of this week. The meeting was very productive and was a positive exchange of information related to trichloroethylene (TCE) found in groundwater along Buckley Road. As promised in that meeting, the County is submitting revised versions of its proposed soil gas and groundwater investigation work plans. The new work plans effectively include all of the technical modifications requested in the RWQCB's memo of May 13, 2016 and were delivered, also via email, earlier today.

During Monday's meeting, the group discussed the RWQCB's memo to the County dated May 13, 2016. Attached to the May 13 memo was a summary of interactions between the RWQCB entitled "Attachment 1 - Water Board Requirements Summary Table." This table was discussed at length and we walked through each of the 14 items. All agreed that with the exception of the item noted below, the County has met all of the requirements. This agreement came with two caveats: (1) that as of this time and following exhaustive searches, the County has not uncovered any documents that show the use of TCE on Airport property or that are responsive to other RWQCB requests and (2) that as the County continues its efforts related to TCE near the Airport, any and all relevant documents found will be provided to the RWQCB in a timely fashion.

The lone remaining item in the "Water Board Requirements Summary Table" requiring specific further response was the request for "Current and historical aerial photos and surface drainage maps for the runway and associated industrial buildings." On or before June 30, 2016, the County will provide a high resolution, orthorectified version of the 1972 aerial photo for the SLO Airport and Buckley Road vicinity. The information will be provided both electronically and in hardcopy (11x17) print. Should the 1972 photo prove insufficient for the RWQCB's needs, the County agreed to provide additional aerial photo information.

The final discussion in Monday's meeting surround timelines for completion of the work plans. The County agreed to expedite its efforts to the greatest extent possible. However, the timelines stated in the May 13, 2016 memorandum are likely unattainable. Those timelines appear to have been based on the originally proposed work plan timelines provided in the County's response of April 15, 2016. The

April 15 proposal assumed that final work plan approval would have already been received and that the contracting for soil gas and groundwater testing contractors would be well underway. Given that the contracting process cannot start until the County has received final approval of the proposed work plans, we are roughly three weeks behind the originally proposed schedule. In the April 15 proposed timelines, four weeks were set aside for contracting and another three weeks were set aside for pre-testing activities such as permitting, scheduling, and scoping for the selected contractors. Unfortunately, it is unlikely that either of these activities can be expedited in a measurable fashion. For example, County Code requires a competitive bid process for projects such as the required groundwater and soil gas testing. Competitive bid processes require that the County post its requirements, provide adequate time for all potential bidders to respond, and then perform a fair and unbiased review of all submitted bids. Only after all of the bids have been evaluated, can the County begin negotiations with a single contractor.

Given the above constraints on timelines, the County intends to provide for the groundwater investigation and soil gas investigation final reports on October 10, 2016 and September 20, 2016, respectively. As shown in the refined project schedules of the work plans, draft test results will be delivered as available, approximately one month prior to the final investigative reports. The County's ability to complete testing and provide investigation reports is predicated on final work plan approval by June 3, 2016. Should final approval be delayed beyond June 3, the RWQCB should assume a day-for-day slip on our deliverables.

As noted previously, the County has not found any specific evidence of TCE use on Airport property. However, investigations and searches for additional archives are continuing. Should the County identify documents or other information believed to be relevant to the TCE investigation in the Buckley Road area, they will be provided to the RWQCB as soon as reasonable. The County is fully committed to continuing to cooperate with your investigation and looks forward to your final approval of our work plans next week.

Sincerely,

Guy W. Savage

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Assistant County Administrative Officer

Cc: File

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