



# HUMAN RESOURCES DEPARTMENT SAN LUIS OBISPO COUNTY

TAMI DOUGLAS-SCHATZ, DIRECTOR

County Government Center, 1055 Monterey Street Suite D-250, San Luis Obispo, CA 93408

January 20, 2016

Central Coast Regional Water Quality Control Board  
Kenneth Harris Jr., Executive Officer  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401  
**HAND DELIVERED**

**RECEIVED**  
**JAN 20 2016**  
State of California  
Central Coast Water Board

**RE: San Luis Obispo County Regional Airport, 903 Airport Drive, San Luis Obispo, CA**

Dear Mr. Harris,

The County of San Luis Obispo Department of Airports is in receipt of your letter dated November 23, 2015 requesting information to evaluate whether past or current aircraft or other operations are potential sources of chlorinated solvent trichloroethene [TCE] pollution detected in offsite groundwater. The Airport has inspected its operations, reviewed records and historical documentation, and observed the nature of the businesses and facilities that have and do surround the San Luis Obispo County Regional Airport ("the Airport"). The County at this time believes it is not the source of groundwater pollution detected beneath nearby properties. As would be true in any situation wherein a negative is to be proved, there may be additional information that could further inform the matter. In particular we have requested, but not yet received, records of the Hazardous Materials Business Plans submitted by lease holders on the Airport to the local Certified Unified Program Agency (CUPA). These plans would indicate the types of chemicals used in the businesses that lease sites from the Airport. Additionally, there appear to be several industrial or commercial operations adjacent to the Airport where use of TCE would be highly likely, if not expected, at least in past operations if not current ones. The Airport would like to better understand these potential sources as well and, accordingly, requests a 30 day extension of the time allowed for response to your initial request, so that we may collect the aforementioned records, analyze them, and report to you our findings.

Notwithstanding the need for additional information on operations within leased sites, the Airport has reviewed a considerable amount of documentation and historical records and not found within them any indications of use, misuse, transfer, spills, or disposal of TCE or products containing TCE. The following addresses your specific requests for information, with a digest of our review provided thereafter.

1. The Airport has attached a list of the tenants within the area now controlled by the Airport. As noted above, a records request sent to the local CUPA that oversees the Hazardous Materials Business Plan Program is intended to yield information on these entities. Such information has not yet been supplied by the CUPA.

2. The Airport can provide details on TCE use only for our operations at this time (see #1 above). The Airport does not use TCE, and has not used TCE in the past. A review of the Airport's Material Safety Data Sheet (MSDS) records going back 30 years shows the only 'solvents' used were two paint thinner products (Ace Paint Thinner, and Klean Strip Paint Thinner) which use aliphatic hydrocarbons Stoddard Solvent as active ingredients, and two concrete degreaser products (SSS HD Concrete Degreaser, Oil-Eater Cleaner Degreaser) which use sodium hydroxide or terpene hydrocarbons (citrus derivatives) as primary active ingredients. The quantities of these chemicals on site was less than 5 gallons at any one time. Records of usage are not readily available, but these are seldom used chemicals at the airport. For example, the concrete degreasers have not been used within the last 25 years, and were only seldom used before that. Two aerosol products were found in historical records that contain chlorinated constituents. These included United 108 Quik Break Penetrating Oil, a seldom used spray can product used to loosen stuck fasteners encountered during equipment repairs. The Airport keeps up to two 12 ounce aerosol spray cans of this 60% tetrachloroethylene (CAS# 127-18-4) product onsite, but likely uses the equivalent of one can every three years. The Airport also historically used a product called Tripleline Foam-Away. Older MSDS for this product report up to 2.1% 1,1,1 TrichloroEthane (CAS# 71-55-6). It was used to reduce foaming in herbicide spraying applications, but was a seldom used product. For at least the last five years this product has not been used by the Airport.
3. As noted above, the Airport does not use, store, or dispose of TCE.
4. Copies of all reports identified as environmental reports, including records of waste disposal, have been provided along with this letter.
5. Other than those references to wells described in the attached environmental reports, the only readily available well information from onsite wells is that recently provided by the Central Coast Regional Water Quality Control Board in response to a recent sampling event.
6. Aerial photographs and surface drainage maps are included within the aforementioned environmental reports and/ or airport master plan documents that accompany this letter.
7. As noted above, the Airport believes the data shown above and supplied with this letter demonstrate that TCE impacts in the Buckley Road area are not the result of discharges from the Airport.

The County of San Luis Obispo has considered the environmental setting that constitutes the Airport and its immediate surroundings, and looked at historical conditions and current conditions.

#### Environmental Setting

Environmental assessments of the property describe the topography as nearly level, with surface drainage running from east to west. A system of surface collection ponds and drainage conveyances help move water off the site and discharge it in one of several locations, including an outfall near Buckley Road.

According to an environmental assessment performed in 2005, the Airport is located within the San Luis Creek groundwater basin. Groundwater exists at depths of 10 to 20 feet below ground surface. This and other assessments state that groundwater flow is anticipated to follow topographic slope – from east to west.

These same reports describe the soils beneath the Airport to be Cropley clay. This soil is described as "somewhat to very deep and well drained ... (with) very slow permeability, medium surface runoff, and moderate erosion hazard. The shrink -swell potential is high."

### Historical Conditions

The Airport has reviewed readily available historical information pertaining to the Airport. An environmental assessment performed on the Filbin property in 2005 summarizes historic conditions in the area and describes the Airport as unpaved landing strips in 1939, paved landing strips in 1949, surrounded largely by agricultural lands and adjacent to the Unocal tank farm. By 1989 adjacent property use shown in historic photos reveals adjacent property use that could be sources of environmental impacts. The Trusco Tank property and the Filbin property, among other nearby industrial operations border the Airport at this time.

In a 1994 aerial photograph, the Filbin property is shown stockpiling large amounts of material and equipment. This property was eventually acquired by the Airport, assessed, and remediated. After extensive groundwork, and after considerable environmental analysis, hazardous wastes were removed from the site but none of those wastes contained chlorinated solvents – TCE was not found in either the materials stockpiled onsite or the soil or water beneath the Filbin site.

An environmental assessment done to address surface soil contamination by jet fuel was prepared for the Airport in February 1995. This assessment considered any chemical spills on the Airport prior to the date of the analysis to be potential contributors to soil contamination at this drainage outfall located at the north end of the property. This report identified only two incidences of chemical spill or release, and these were fuel spills data in August of 1990, and prior to 1988. Soil sampling and analysis confirmed that the only contaminants drained off the site and into the soil at this point in time were jet fuel from these spills.

### Current site conditions

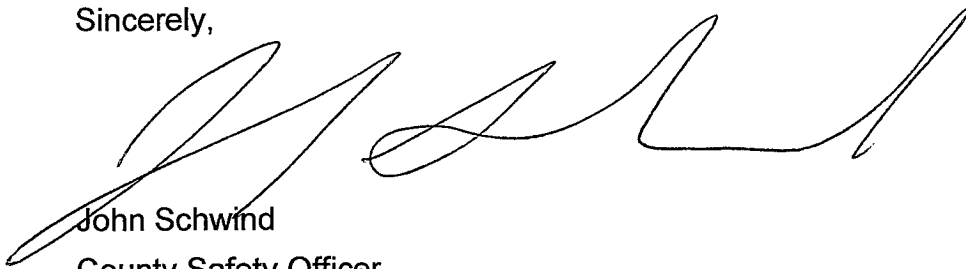
The Airport has inspected its current operations, and reviewed processes and records of operations that utilize chemicals on site. Material Safety Data Sheets (now called simply Safety Data Sheets (SDS) under the Globally Harmonized Standard) have been maintained on site for decades, and reveal the types of materials and material constituents that are or have been utilized in airport operations. None of the materials used now or in the past, as represented by these SDS, are comprised of TCE. With respect to airport maintenance or operational processes, TCE is not used onsite, and the Airport has no record that it has been in the past. Records also show no spills, releases, or disposal of TCE on or from the Airport.

At the present time there exists on the property a very large excavation, a hole in the ground constructed to form the foundation for new airport facilities. This excavation is 12 feet deep. The excavation is located in the heart of the airport property, exactly in the location where environmental contamination would be expected if the Water Quality Control Board's theory of historic operations had created a surface or subsurface environmental impact. Throughout this excavation, hundreds of thousands of cubic yards of soil have been moved, and groundwater has been flowing into the excavation, yet there is no evidence of contamination of any type. There have been no reports of unusual odors or soil colors, and no reports of visually detectable impacts to groundwater.

There are at least 2 wells on the Airport property. These wells are located as shown on the enclosed map. Recent water samples taken by County Environmental Health reveal low levels of TCE in the samples. The absence of TCE use on the Airport suggests that the groundwater impacts may be originating up gradient, possible from a nearby commercial/ industrial operation (a business type that may have used TCE in a cleaning solvent in the past) that is adjacent to the Airport.

We look forward to your evaluation of this submittal, including our accompanying documents, and would be happy to discuss same at a time convenient to you. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Schwind', written in a cursive style.

John Schwind  
County Safety Officer

Cc: Rita Neal, County Counsel  
Kevin Bumen, Airport Director

Attachment List

Attachments:

- Department of Transportation: Environmental Impact Assessment Report
- Preliminary Specific Plan Analysis for the San Luis Obispo County Airport Area Specific Plan
- Industrial Sector Analysis – San Luis Obispo County Airport Area Industrial Specific Plan
- San Luis Obispo County Airport Area Specific Plan – Water Supply, Quality and Sewage Disposal
- Development Characteristics Land Use Survey – Airport Area Specific Plan
- Final Environmental Assessment/ Environmental Impact Report - San Luis Obispo County Airport Master Plan
- Phase I and II Environmental Site Assessment - Filbin Parcel
- Supplemental Soil Assessment – Filbin Parcel
- San Luis Obispo County Airport Master Plan – McChesney Field
- San Luis Obispo Airport Area Specific Plan
- San Luis Obispo County Airport Expansion Project – Final Wetland Delineation Report
- Supplemental Environmental Assessment - San Luis Obispo County Airport Master Plan Update
- Draft Supplemental Environmental Assessment – San Luis Obispo County Airport Master Plan
- ESA Transmittal: Draft Supplemental Environmental Assessment for the San Luis Obispo Airport Master Plan
- Table of Contents - San Luis Obispo County Airport Master Plan: EIR Addendum #3
- California Red-legged Frog Field Surveys for the San Luis Obispo County Airport Master Plan (x2)
- San Luis Obispo County Airport Expansion Project – Final Wetland Delineation Report (2)
- Mesa Airlines Proposed Regional Jet Service Between San Luis Obispo County Regional Airport and Phoenix Sky Harbor International Airport
- Draft Environmental Assessment/Environmental Impact Report: San Luis Obispo County Regional Airport Master Plan Update
- Phase I Environmental Site Assessment – Filbin Parcel and Trusco Tank Parcel
- Drainage Study for San Luis Obispo County Regional Airport
- San Luis Obispo County Airport – Collet Easement – Soil Contamination Clean-up: Summary of Testing Results
- County of San Luis Obispo Ground Water Study - San Luis Obispo Airport Area
- County of San Luis Obispo Airport Area Specific Plan – Drainage Master Plan
- Airport Master Plan – Update Study and Aluc Update Report
- Central Coast Regional Water Quality Control Board – Trichloroethene Results From Your Wells
- Map of Original Well Testing
- Hazardous Materials Transportation Documentation