

ATTACHMENT 1

SAN LUIS OBISPO COUNTY REGIONAL AIRPORT – UPDATE ON IMPLEMENTATION OF THE VOLUNTARY CLEANUP AND ABATEMENT AGREEMENT TO ADDRESS PFAS CONTAMINATION

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On July 21, 2023, the Central Coast Water Board adopted [Resolution R3-2023-0046](#)¹ which ratified a [Voluntary Cleanup and Abatement Agreement](#)² (VCAA) between the Central Coast Water Board Cleanup Team, San Luis Obispo County, and the California Department of Forestry and Fire Protection (CAL FIRE) to address per- and polyfluoroalkyl (PFAS) contamination in lieu of consideration of adopting a draft cleanup and abatement order. At the hearing, Board Members requested that staff provide regular updates on the implementation of the VCAA. This Executive Officer’s report includes the most recent status on the actions and deliverables required by Resolution R3-2023-0046 and the VCAA.

A detailed schedule of milestones and deliverables included in the VCAA is shown in Table 1. In summary, San Luis Obispo County and CAL FIRE (the “Airport Parties”) agreed to, among other things, implement:

- a) Immediately provide point-of-use (“POU”) treatment systems to locations where primary drinking water exceeds a PFAS Standard, as defined in the VCAA, for Airport-related PFAS;
- b) Evaluate the effectiveness of, plan for, and implement point-of-entry (“POE”) treatment for those locations where groundwater is impacted by Airport-related PFAS in excess of a PFAS Standard within 12 months of VCAA ratification;
- c) Evaluate and plan for long-term water supply solutions;
- d) Continue public outreach and develop a Public Participation Plan;
- e) Continue investigation activities and develop remediation feasibility studies and remedial action plans and, where feasible, implement remedial action plans; and
- f) Prepare and submit a human health risk assessment. Groundwater, supply well, and post-treatment system monitoring and testing are also included in the Agreement.

Progress to Implement the Voluntary Cleanup and Abatement Agreement

Document Submittals

As of November 7, 2023, the Airport parties submitted the following documents to the Central Coast Water Board on time according to the VCAA schedule:

- *Public Participation Plan*, September 4, 2023³ and November 3, 2023;⁴

¹ https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2023/r3-2023-0046.pdf

² VCAA: <https://geotracker.waterboards.ca.gov/?surl=6ejq7>

³ September 4, 2023, Public Participation Plan: <https://geotracker.waterboards.ca.gov/?surl=toggy>

⁴ November 3, 2023, Public Participation Plan: <https://geotracker.waterboards.ca.gov/?surl=krh40>

- *Domestic Water Use / PFAS Treatment System Sampling Workplan*, September 4, 2023;
- *PFAS Site Conceptual Model*,⁵ October 19, 2023;
- *POE PFAS Treatment Evaluation Workplan*,⁶ October 19, 2023;
- *PFAS Groundwater Monitoring and Sampling Plan*,⁷ October 19, 2023;
- *Quarterly Status Report No. 1*,⁸ November 3, 2023;
- *Phase II Water Supply, Replacement Water/Treatment Alternatives Evaluation Workplan*,⁹ November 17, 2023; and
- *Remedial Investigation Workplan*,¹⁰ November 18, 2023

Field Activities

Airport Parties have conducted the following field activities since the VCAA ratification: Performed groundwater monitoring and treatment verification monitoring, installed some POU treatment systems, performed maintenance on some treatment systems (e.g., filter media changes), initiated a domestic water sampling plan, and performed field inspections for POE installation planning.

Public Outreach

San Luis Obispo County hosted a community meeting to hear public comments on concepts for a draft public participation plan¹¹ on August 28, 2023. As part of the public participation plan, San Luis Obispo County and CAL FIRE agreed to include formation of a Community Advisory Group (CAG). The County considered community feedback to inform a public participation plan that was submitted to the Central Coast Water Board on September 4, 2023. Central Coast Water Board staff provided feedback on the plan on October 18, 2023, and requested submittal of a revised public participation plan. The County submitted a revised public participation plan on November 3, 2023.

The Airport Parties plan to host monthly CAG meetings. The Central Coast Water Board received public input nominating specific community members to represent the community on the CAG and parties agreed that this approach was acceptable. San Luis Obispo County hosted a CAG meeting on October 3, and the November 7, 2023, CAG meeting also included a CAL FIRE representative. The Central Coast Water Board Chair, Executive Officer, Site Cleanup Program Manager and assigned technical staff also participated in the CAG meetings. Future CAG meetings are planned for the first Tuesday of each month.

⁵ Site Conceptual Model: <https://geotracker.waterboards.ca.gov/?surl=syovt>

⁶ POE PFAS Treatment Evaluation Workplan: <https://geotracker.waterboards.ca.gov/?surl=50z1r>

⁷ PFAS Groundwater Monitoring Sampling Plan: <https://geotracker.waterboards.ca.gov/?surl=xi358>

⁸ Quarterly Status Report No. 1: <https://geotracker.waterboards.ca.gov/?surl=jwia9>

⁹ *Phase II Water Supply, Replacement Water/Treatment Alternatives Evaluation Workplan*: <https://geotracker.waterboards.ca.gov/?surl=96mq8>

¹⁰ Remedial Investigation Workplan: <https://geotracker.waterboards.ca.gov/?surl=18t62>

¹¹ Handout of public participation plan ideas for August 28, 2023, public meeting: <https://geotracker.waterboards.ca.gov/?surl=udpkk>

Airport Parties' Compliance with VCAA

San Luis Obispo County and CAL FIRE have made substantial progress and generally complied with the requirements of the VCAA. However, four public water supply wells serving three commercial-industrial properties in the Old Santa Fe Road area have not yet received offer letters for POE treatment, as was required by August 20, 2023, under the VCAA. These four wells contain Airport-related PFAS and are permitted by the Division of Drinking Water for use as drinking water sources. Central Coast Water Board staff made a verbal request to Roux Associates, Inc., the consultant to the Airport Parties, to provide POU treatment systems at these wells on September 13, 2023. This request was repeated as part of October 17, 2023, correspondence¹² from Central Coast Water Board staff as feedback to a work plan for domestic water use/PFAS treatment system sampling. On November 6, 2023, Roux Associates, Inc. informed Central Coast Water Board staff that the Airport Parties intend to determine where water is used for "Domestic drinking" at these locations and make offers for POE treatment; no schedule has been provided. A detailed status of VCAA milestones and deliverables is included in Table 1.

Status of Additional Actions Identified in Resolution R3-2023-0046

As part of the adoption of Resolution R3-2023-0046, the Central Coast Water Board identified the following three additional action items outside the VCAA:

1. Reimbursement of Treatment Costs

The Central Coast Water Board requested that the Airport Parties consider reimbursement of costs to those who installed PFAS treatment systems after learning of the presence of PFAS in their wells as a result of the investigations conducted by the Airport Parties. The Airport Parties agreed to report back to the Central Coast Water Board concerning this request at a public meeting as soon as practicable.

Status: The County conveyed to CAG meeting attendees that they plan to provide reimbursement. Airport officials informed the CAG group during the November 7, 2023, meeting that they intend to reimburse for expenses related to water treatment systems (1) if the treatment was installed for PFAS and (2) if the treatment was installed before the July 21, 2023, VCAA ratification. The County indicated that they will conduct outreach to the community on this topic soon after the November 18, 2023, deadline for deliverables, per the VCAA, to the Central Coast Water Board. No report to the Central Coast Water Board at a public meeting has been made.

2. Formation of a Community Advisory Group

The Airport Parties agreed to include the formation of a CAG as part of the Public Participation Plan

¹² October 17, 2023, Central Coast Water Board correspondence:
<https://geotracker.waterboards.ca.gov/?surl=iwlv8>

Status: This action is completed. As described above, the Airport Parties have formed a CAG and hosted two CAG meetings to date, with additional CAG meetings planned for the first Tuesday of each month.

3. PFAS-Related Health Survey

The Central Coast Water Board recommended that the San Luis Obispo County Public Health Department consider conducting a health survey for those who may have been impacted by Airport Related PFAS.

Status: On November 28, 2023, the San Luis Obispo County Public Health Department provided a response to their consideration of generating a health survey for the community impacted by Airport Related PFAS. The Public Health Department response concludes that performing a health survey is not feasible at this time and suggests that the priority actions are to continue to address future exposure to PFAS from water systems and to educate residents as to possible health effects of PFAS so that they can discuss with their health care providers the potential need to monitor for related symptoms and conditions. Additionally, the Public Health Department supports efforts to conduct a human health risk assessment and recommends consultation with the Office of Environmental Health Hazard Assessment (OEHHA) on the advisability of proceeding with a community health survey in the future. The Public Health Department's complete response is available on GeoTracker.¹³

Health Survey vs. Human Health Risk Assessment

In Resolution R3-2023-0046, the Central Coast Water Board recommended that the Public Health Department consider a health survey and in the VCAA, Airport Parties agreed to conduct a Human Health Risk Assessment (HHRA) evaluating the risk from Airport-Related PFAS (VCAA Section 4.4). The following discussion helps to clarify the differences between these types of health-related studies.

In general, a health survey is the systematic collection of data pertaining to health and disease in a human population within a given geographic area. As noted by the Public Health Department, Resolution R3-2023-0046 did not define "health survey" in the context of the Central Coast Water Board's request. In their response, the Public Health Department described a health survey as "conducting a survey of community members for health conditions potentially related to PFAS exposure to determine whether those health conditions are present at a higher rate in the airport community than in a comparable population not exposed to PFAS from the airport in order to determine whether exposure to Airport Related PFAS is causing adverse health effects in the community". Central Coast Water Board staff would not typically be involved in a community health survey.

¹³ Public Health Department Response to Central Coast Water Board's Request to Consider Generating a Health Survey for those Impacted by Airport Related PFAS:
<https://geotracker.waterboards.ca.gov/?surl=mcgry>

In contrast, a HHRA is an assessment, usually performed by toxicologists, that evaluates the probability (or risk) of adverse health and other environmental impacts posed, in this case, by PFAS to people and other organisms through various exposure pathways. Examples of the exposure pathways that will be evaluated as part of the San Luis Obispo County Regional Airport HHRA include drinking water consumption (for PFAS without a drinking water standard), dermal contact from bathing, showering with water vapor inhalation, irrigation of crops with those crops consumed by people or animals, livestock consuming PFAS-impacted water or food and those livestock products being consumed by people.

Section 4.4 of the VCAA requires that the Airport Parties submit an HHRA to the Central Coast Water Board by January 21, 2025. Central Coast Water Board staff intends to coordinate with OEHHA to request that toxicologists peer review the HHRA and provide comments. The final HHRA will be used to inform decisions about additional PFAS assessment, water treatment, cleanup, and/or abatement that may be required as part of the San Luis Obispo Regional Airport case. Section 3.9 of the VCAA also requires the Airport Parties to describe how they will communicate the human health risks of PFAS exposure, water treatment/water replacement plans and progress, investigation and cleanup efforts and gather community input as part of the Public Participation Plan.

Central Coast Water Board staff will continue to work with the Airport Parties to prioritize safe drinking water and implement the VCAA, in coordination with the CAG. Staff will continue to provide regular updates to the Board through the Executive Officer's report (e.g., at least biannually or more frequently if issues arise). For a complete description of the San Luis Obispo County Regional Airport case, including regulatory activities and environmental data, please go to the GeoTracker link:

https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000012768

Table 1
San Luis Obispo County Regional Airport
Voluntary Cleanup and Abatement Agreement – Schedule of Milestones and Deliverables
Status as of November 7, 2023

Due Date	Milestone / Deliverable	Status	Notes/Description
7/21/2023	Voluntary Cleanup and Abatement Agreement (VCAA)	Ratified	The Central Coast Water Board ratified the VCAA on July 21, 2023, the effective date of the agreement.
10/31/2023	First Quarterly Status Update Report (through Q3)	Submitted on time	(2.3) Airport Parties agreed to provide Quarterly Status Update Reports regarding the progress of the tasks completed under the VCAA.
8/20/2023	Point-of-Use (POU) Treatment Offer Letters	Incomplete	(3.2.1) Airport Parties will offer POU treatment (locations with a PFAS standard exceedance and without existing treatment), within 30 days of VCAA. This task is generally complete, except for four (4) public supply wells near Old Santa Fe Road that are past due. On November 6, 2023, Roux Associates, Inc. informed Central Coast Water Board staff that the Airport Parties intend to determine where water is for “Domestic drinking” at these locations and make offers for POE treatment;

Due Date	Milestone / Deliverable	Status	Notes/Description
9/4/2023	Domestic Water Use Sampling Work Plan	Completed	(3.3) Airport Parties submitted a work plan for the sampling of domestic water from private and public wells and/or well systems, including treatment systems. The work plan also covers the collection of water use information. The Central Coast Water Board issued a workplan concurrence letter on 10/17/2023.
11/16/2023	Domestic Water Sampling Plan Implementation	Underway	(3.4) Airport Parties agreed to implement the Domestic Water Sampling Plan within 30 days of Central Coast Water Board approval.
8/28/2023	Community Outreach Meeting	Completed	(3.9) Airport Parties held the initial Community Outreach Meeting on August 28, 2023, to discuss the draft Public Participation Plan and receive public comments prior to submission to the Central Coast Water Board.
9/4/2023	Public Participation Plan	Submitted on time; Pending Review	(3.9) Airport Parties submitted a Public Participation Plan to the Central Coast Water Board on September 4, 2023. Central Coast Water Board staff provided feedback on the plan on October 18, 2023, and requested submittal of a revised public participation plan. The County submitted a revised public participation plan on November 3, 2023. Staff is currently reviewing the revised plan.

Due Date	Milestone / Deliverable	Status	Notes/Description
	Community Advisory Group Meetings	Ongoing	(Resolution No. R3-2023-0046) Airport Parties agreed to form a Community Advisory Group (CAG) as part of the Public Participation Plan. CAG Meetings were held on 10/3/2023 and 11/7/2023. Future meetings will be held monthly.
10/19/2023	Point-of-Entry (POE) Treatment Evaluation Work Plan	Submitted on time	(3.6) Airport Parties agreed to submit a work plan to evaluate POE treatment decisions. Wells and residences to be evaluated for POE treatment systems will include all residences served by a private or public groundwater supply well that has raw water above a PFAS Standard. Staff is currently reviewing the plan.
120 days after approval of POE Treatment Evaluation Work plan	POE PFAS Treatment Report	Not due yet	(3.7) Airport Parties agreed to submit a POE PFAS Treatment Report within 120 days after the Central Coast Water Board's approval of the Work plan.
60 days after approval of POE PFAS Treatment Report	POE Treatment Implementation	Not due yet	(3.8) Airport Parties agreed to begin POE implementation within 60 days of Central Coast Water Board approval of the POE PFAS Treatment Report. POE treatment installations are to be completed by July 21, 2024.

Due Date	Milestone / Deliverable	Status	Notes/Description
9/19/2023	Groundwater Monitoring Event – Initial Sampling	Completed	(3.10.1) Airport Parties agreed to perform an initial sampling of the Airport-associated groundwater monitoring wells (wells MW-1 through MW-9 and OMW-1 through OMW-3) and up to 10 private and/or public wells.
10/19/2023	Groundwater Monitoring Plan	Submitted on time	(3.10.2) Airport Parties agreed to prepare a Groundwater Monitoring Plan that establishes the schedule/frequency for subsequent groundwater monitoring and reporting. Staff is currently reviewing the plan.
10/19/2023	PFAS Site Conceptual Model	Submitted on time	(3.11) Airport Parties agreed to update the PFAS Site Conceptual Model to include maps and geologic/hydrogeologic cross-sections. The Site Conceptual Model will describe the distribution of PFAS in the subsurface and will provide an evaluation of potential exposure pathways and will be updated as the project progresses. Staff is currently reviewing the Site Conceptual Model.

Due Date	Milestone / Deliverable	Status	Notes/Description
11/18/2023	Remedial Investigation (RI) Work Plan	Submitted on time; Pending Review	(3.12) Airport Parties agreed to prepare a work plan to delineate Airport-Related PFAS in soil, sediments, and groundwater. The purpose of the RI is to gather additional information/data to support the preparation of a Human Health Risk Assessment (HHRA) and direct the remedial approach to address the impacts of Airport-Related PFAS.
11/18/2023	"Phase II" Water Supply, Replacement Water/Treatment Alternatives Evaluation Work Plan	Submitted on time; Pending Review	(3.14) Airport Parties agreed to submit a work plan for the continued evaluation of long-term water supply alternatives. The purpose of this evaluation is to identify a feasible permanent water supply solution that will cover all water uses for the area affected by Airport-Related PFAS.
4/16/2024	PFAS Feasibility Study/Remedial Action Plan (FS/RAP) Work Plan	Not due yet	(3.13) Airport Parties agreed to submit a work plan for performing a Feasibility Study (FS) and developing a Remedial Action Plan (RAP) to mitigate/remediate the impacts of Airport-Related PFAS
1/21/2025	RI Report	Not due yet	(4.3) Report summarizing the findings of the RI.
1/21/2025	Human Health Risk Assessment	Not due yet	(4.4) Airport Parties agreed to submit a Human Health Risk Assessment (HHRA) report evaluating the risk from Airport-Related PFAS.
1/21/2026	Feasibility Study	Not due yet	(4.5) Airport Parties agreed to submit a Report summarizing the findings of the FS.

Due Date	Milestone / Deliverable	Status	Notes/Description
7/21/2026	Remedial Action Plan	Not due yet	(4.5) Airport Parties agreed to submit a Remedial Action Plan presenting the approach to address impacts from Airport-Related PFAS
7/21/2026	Long-Term Water Supply Evaluation	Not due yet	(4.6) Airport Parties agreed to submit a report presenting a preliminary design, estimated costs, and preliminary schedule for implementation of a long-term water supply solution.
7/21/2027	Well-Head Treatment System Installation	To be determined	(4.6.4) Well-head treatment to be installed if the result of the long-term water supply evaluation is that it is infeasible.