
Central Coast Regional Water Quality Control Board

July 16, 2021

Chris Hastert
General Manager
Santa Maria Public Airport District
3217 Terminal Drive
Santa Maria, CA 93455
Email: chastert@santamariaairport.com

via Electronic Mail

Dear Mr. Hastert:

SITE CLEANUP PROGRAM: SANTA MARIA AIRPORT PUB/CAPT G ALLAN HANCOCK FLD, AIRPORT ID SMX, 3217 TERMINAL DRIVE, SANTA MARIA, SANTA BARBARA COUNTY – RESPONSE TO SUPPLEMENTAL PFAS INVESTIGATION WORK PLAN AND REQUIREMENT FOR SUPPLEMENTAL SITE INVESTIGATION REPORT

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff reviewed SCS Engineers' October 8, 2020 *Supplemental PFAS Investigation Work Plan*¹ (Work Plan) prepared on behalf of Santa Maria Public Airport District (Airport District) for the site located at 3217 Terminal Drive, Santa Maria. The Airport District conducted site investigation activities in response to per- and polyfluoroalkyl substances (PFAS) investigation requirements set forth in a March 20, 2019 State Water Resources Control Board (State Water Board) order (WQ 2019-0005-DWQ)² to determine if surface and subsurface media are impacted by PFAS-associated operations [e.g., use of aqueous film-forming foam (AFFF)] at the airport. After considering the information and analytical findings presented in the initial round of investigation activities conducted at the airport in March 2020, the Central Coast Water Board required the Airport District to submit a supplemental PFAS investigation work plan to further delineate the vertical and lateral extent of PFAS-impacted media. This letter provides Central Coast Water Board's comments on the Work Plan and conditional concurrence with the proposed scope of work (a) included in the Work Plan and (b) presented during a conference call held on December 16, 2020, provided the Airport District addresses our requirements described in this letter. The Airport District is required to submit a supplemental site investigation report to this office no later than **November 16, 2021**.

¹ October 8, 2020 *Supplemental PFAS Investigation Work Plan*:

<https://geotracker.waterboards.ca.gov/?surl=t7aim>

² Order WQ-2019-0005-DWQ: <https://geotracker.waterboards.ca.gov/?surl=ye03f>

Scope of Work Presented in the October 8, 2020 Work Plan

In the Work Plan, the Airport District proposes supplemental investigation activities and field procedures to be implemented at both known and potential PFAS source areas (including the AFFF storage area, AFFF activation/deployment area associated with an interior hangar fire, nozzle testing area, and airplane crash site), drainage areas, and existing supply wells. The scope of work proposed by the Airport District includes:

- The advancement, installation, and sampling of nine permanent groundwater monitoring wells. The Airport District proposes to recover soil samples from each of the nine borings at the following depth intervals: at, directly above, and directly below the groundwater interface.
- The recovery of one shallow soil sample (from Basin C) and two surface water samples from onsite drainage basins (Basin A and Basin C).
- The recovery of one groundwater sample from existing City municipal supply well #5 (inactive).
- An ELAP³-accredited laboratory will analyze soil, groundwater, and surface water samples for PFAS. In addition, the Airport District proposes to have water samples analyzed for general chemistry parameters (e.g., total dissolved solids, chloride, etc.).

December 16, 2020 Conference Call

On December 16, 2020, representatives from the Airport District, SCS Engineers, and the Central Coast Water Board discussed, via a conference call, the scope of work presented in the Work Plan. Key points discussed during the conference call include:

- The Central Coast Water Board indicated that the proposed characterization activities to be performed within the PFAS source areas lacks a sufficient scope of work to adequately address one or more of the following: lateral/vertical delineation of known soil impacts and/or vertical delineation of known underlying groundwater impacts.
 - The Airport District stated that the proposed investigation activities focus on identifying potential impacts to underlying groundwater. The Airport District understands that based on known PFAS impacts and the proposed scope of work, additional soil and groundwater characterization activities may be warranted following implementation of this phase of investigation.
 - The Airport District acknowledged the need to delineate soil impacts and indicated that they plan to review existing soil data and adjust the soil sampling program (e.g., depth intervals) accordingly. Further, the Airport District has proposed to recover soil samples at five-foot depth intervals in select PFAS source areas; analysis of select soil samples will be determined based upon depth to first encountered groundwater, existing analytical data, etc.
- The Central Coast Water Board inquired about 'drainage area B' shown on a site map.

³ Environmental Laboratory Accreditation Program

- The Airport District indicated that they reviewed the drainage areas and found that airport outfalls drain to Basins A and C and that no identified potential PFAS sources areas drain to 'drainage area B'.
- The Central Coast Water Board discussed the inactive status of City supply well #5.
 - The Airport District indicated that there are plans to use this well for agricultural practices and hope it will be operable at the time of sampling activities.
- The Central Coast Water Board discussed the need for onsite well construction details.
 - The Airport District plans to contact the City of Santa Maria for well construction information.

Central Coast Water Board Comments

The proposed scope of work is not expected to fully delineate (laterally and/or vertically) known PFAS-impacted media at the airport but is expected to provide information toward reaching this goal. Additional characterization activities may be warranted following this phase of investigation. Furthermore, City of Santa Maria supply well #10, located onsite and downgradient of airport operations, exhibited PFAS detections in the second and fourth quarter sampling events performed as part of public water system testing requirements issued by the State Water Board in 2019.

As discussed during the December 2020 conference call, the Central Coast Water Board reiterates that we will not close a case without complete vertical and lateral delineation of impacted media from a site.

The Airport District proposes to analyze water samples for general chemistry parameters. The Central Coast Water Board has determined that there is no need to run samples recovered from permanent groundwater monitoring wells for general chemistry parameters at this time, though the Airport District is free to analyze for these parameters if they wish. The Central Coast Water Board will notify the Airport District if these analytical data are required in future sampling events.

Required Technical Report

The Central Coast Water Board concurs with the scope of work presented (a) in the Work Plan and (b) during the December 2020 conference call provided the Airport District complies with the following conditions, including submittal of a technical report:

- The Airport District must implement modifications (e.g., evaluation of proposed soil sampling depths, etc.) to the proposed scope of work as presented and discussed during the December 16, 2020 conference call and as described herein.
- The Airport District must advance soil borings used to facilitate groundwater collection to first-encountered groundwater or until drilling refusal is encountered due to local geologic conditions.
- The Airport District must have samples analyzed by a laboratory that is California ELAP-accredited to perform the analytical method for PFAS compliant with

Department of Defense (DoD) Table B-15 of Quality Systems Manual (QSM), dated 2017, version 5.1 or later.

- The Airport District must submit a supplemental site investigation technical report that further delineates the vertical and lateral extent of PFAS-impacted media (soil, groundwater, and surface water) by **November 16, 2021**. The submittal technical report must, at a minimum, include: a copy of boring logs and well construction details (e.g., total depth, top of screen, and screen length) for onsite wells (e.g., city supply wells, agricultural supply wells, etc.) to assist in the evaluation of water quality impacts underlying the Airport, analytical data including total PFAS concentrations⁴ in tabular format and on a map, and the Airport District's data interpretation and recommendations.
- The Airport District must submit technical reports in a searchable electronic format, with transmittal letter, text, tables, figures, laboratory analytical data, and appendices in Portable Document Format (PDF) and in electronic data deliverable (EDD) format. The reports and EDD must be uploaded by the specified due date to GeoTracker via the Electronic Submittal of Information (ESI) Portal,⁵ as required by California law.

Reference material including PFAS sampling guidelines, laboratories accredited by ELAP, target analytical reporting limits for PFAS compliance with DoD Table B-15 of QSM, Version 5.1 or later, public water system testing results, etc. can be found at the following link: <https://www.waterboards.ca.gov/pfas>.

Legal Requirements

The Central Coast Water Board's requirement that the Airport District submit a supplemental site investigation report by **November 16, 2021**, is made pursuant to section 13267 of the California Water Code. Pursuant to section 13268 of the California Water Code, a violation of a California Water section 13267 requirement may subject the Airport District 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 the extent of PFAS-impacted media to ensure the protection of groundwater and human health. The Airport District is required to submit this information because the Airport District is the current property owner and, as indicated by available data, it is responsible for the discharge. The evidence supporting this requirement is described herein and on GeoTracker at the following link: <http://geotracker.waterboards.ca.gov/?qid=T10000012770>.

The cost of preparing the required supplemental site investigation technical report is estimated to be between \$130,000 and \$150,000. The submittal of a technical report on further investigation work will provide the benefit of informing decisions about the need for any further investigation or implementation of remedial actions to protect human

⁴ Total PFAS is intended here as the sum of detected PFAS compounds in any given sample

⁵ See link for general information and Help Desk assistance:

https://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal.

health and water quality. Thus, the burden, including costs, of the investigation and report bear a reasonable relationship to its need and the benefits to be obtained. More detailed information is available in the Central Coast Water Board's public file, including GeoTracker,⁶ on this matter.

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 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 are available at:

https://www.waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.s.html.

If you have any questions regarding this letter, please contact Kelsey Gerhart at (805) 594-6182 or kelsey.gerhart@waterboards.ca.gov or Greg Bishop at (805) 549-3132.

Sincerely,

for Matthew T. Keeling
Executive Officer

cc (via email):

Mr. Ric Tokoph, Santa Maria Public Airport District, rtokoph@santamariaairport.com
Mr. Chuck Houser, SCS Engineers, chouser@scsengineers.com
Mr. Austin Bailey, SCS Engineers, abailey@scsengineers.com
Mr. Christopher Crosby, SCS Engineers ccrosby@scsengineers.com
Mr. Greg Bishop, Central Coast Water Board, greg.bishop@waterboards.ca.gov
Ms. Kelsey Gerhart, Central Coast Water Board, kelsey.gerhart@waterboards.ca.gov
Ms. Angela Schroeter, Central Coast Water Board, angela.schroeter@waterboards.ca.gov

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GeoTracker ID: T10000012770
CR# 2030172

⁶ GeoTracker Santa Maria Public Airport District case file:
<http://geotracker.waterboards.ca.gov/?qid=T10000012770>