

ATTACHMENT 6

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

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Background

On July 21, 2023, the California Regional Water Quality Control Board, Central Coast Region (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 substances (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 attachment to the 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:

- a) Provide and maintain 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 above 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 analysis are also included in the Agreement.

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

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

Progress to Implement The Voluntary Cleanup and Abatement Agreement

Document Submittals

As of November 21, 2025, the Airport Parties submitted these documents to the Central Coast Water Board:

- *Public Participation Plan*, September 4, 2023³ and November 3, 2023;⁴
- *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;
- *Remedial Investigation Workplan*,¹⁰ November 18, 2023;
- *Public Health Department Response to Request for a Health Survey for Airport; Related PFAS Impacts*,¹¹ November 28, 2023;
- *Revised Remedial Investigation Workplan*,¹² February 5, 2024;
- *Groundwater Monitoring and Sampling Report*,¹³ March 4, 2024;
- *Revised Remedial Investigation Workplan*,¹⁴ March 21, 2024;
- *Quarterly Status Report No. 2 - Fourth Quarter 2023*,¹⁵ March 29, 2024,*
- *Point of Entry PFAS Treatment Evaluation Report*,¹⁶ April 10, 2024;
- *Feasibility Study/Remedial Action Plan Workplan*,¹⁷ April 16, 2024;
- *Remedial Investigation Progress Report No. 1*,¹⁸ July 12, 2024;
- *Quarterly Status Report No. 3 - First Quarter 2024*,¹⁹ August 16, 2024,*
- *Remedial Investigation Progress Report No. 2*,²⁰ September 16, 2024;

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

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

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

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

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

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

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

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

¹¹ Response to Health Survey Request: <https://geotracker.waterboards.ca.gov/?url=tl2xl>

¹² Revised Remedial Investigation Workplan: <https://geotracker.waterboards.ca.gov/?url=pptr4>

¹³ Groundwater Monitoring Report: <https://geotracker.waterboards.ca.gov/?url=evfys>

¹⁴ Revised Remedial Action Workplan: <https://geotracker.waterboards.ca.gov/?url=qepbd>

¹⁵ Quarterly Status Report No. 2: <https://geotracker.waterboards.ca.gov/?url=1eg14>

¹⁶ POE PFAS Treatment Evaluation Report: <https://geotracker.waterboards.ca.gov/?url=94c65>

¹⁷ Feasibility Study/Remedial Action Workplan: <https://geotracker.waterboards.ca.gov/?url=4hcul>

¹⁸ Remedial Investigation Progress Report: <https://geotracker.waterboards.ca.gov/?url=6uowo>

¹⁹ Quarterly Status Report No. 3: <https://geotracker.waterboards.ca.gov/?url=bllra>

²⁰ Remedial Investigation Progress Report: <https://geotracker.waterboards.ca.gov/?url=c75a6>

- *Groundwater Monitoring and Sampling Report*,²¹ October 18, 2024;
- *Remedial Investigation Progress Report No. 3*,²² November 15, 2024;
- *Completion of Point-of-Entry (POE) Treatment Implementation*,²³ November 26, 2024;
- *Request for Consultation with OEHHA Toxicologist*,²⁴ November 27, 2024;
- *Quarterly Status Report No. 4 – Second Quarter 2024*,²⁵ November 27, 2024;
- *Email Correspondence - FAA Grant Summary*,²⁶ November 27, 2024;
- *Letter to Board Members*,²⁷ December 6, 2024
- *Preliminary Data Package – Remedial Investigation*,²⁸ December 20, 2024;
- *Supplemental Remedial Investigation Workplan*,²⁹ January 2, 2025;
- *Request for Extension - Remedial Investigation Report*,³⁰ January 7, 2025;
- *Remedial Investigation Progress Report No. 4*,³¹ February 4, 2025;
- *Groundwater Monitoring and Sampling Report*,³² February 14, 2025;
- *Quarterly Status Report No. 5 – Third Quarter 2024*,³³ March 7, 2025;
- *Remedial Investigation Progress Report No. 5*,³⁴ March 21, 2025;
- *Quarterly Status Report No. 6 – Fourth Quarter 2024*,³⁵ May 1, 2025;
- *Remedial Investigation Report*,³⁶ Revised August 21, 2025;**
- *Email Correspondence – FAA Grant Update*,³⁷ June 26, 2025;
- *Quarterly Status Report No. 7 – First Quarter 2025*,³⁸ September 12, 2025; and
- *Technical Memo – Airport Boundary Shallow Carbon Barrier Pilot Test*,³⁹ October 13, 2025.
- *Draft Water Supply Feasibility Study*⁴⁰ – November 13, 2025

* Quarterly Status Reports do not have due dates specified in the VCAA. Submittals for the last four quarterly reports are significantly delayed relative to the reporting period (Table 1) and the last quarterly status report was submitted for the period ending March

²¹ Groundwater Monitoring Report: <https://geotracker.waterboards.ca.gov/?url=tm2r0>

²² Remedial Investigation Progress Report: <https://geotracker.waterboards.ca.gov/?url=ro74n>

²³ Completion of POC Treatment Implementation: <https://geotracker.waterboards.ca.gov/?url=m8s26>

²⁴ Request for Consultation with OEHHA Toxicologist: <https://geotracker.waterboards.ca.gov/?url=ggpro>

²⁵ Quarterly Status Report No. 4: <https://geotracker.waterboards.ca.gov/?url=bdb3q>

²⁶ Email Correspondence – FAA Grant Summary: <https://geotracker.waterboards.ca.gov/?url=vwyvn>

²⁷ Letter to Board Members: <https://geotracker.waterboards.ca.gov/?url=r8enx>

²⁸ Preliminary Data Package – Remedial Investigation: <https://geotracker.waterboards.ca.gov/?url=vydfa>

²⁹ Supplemental Remedial Investigation Workplan: <https://geotracker.waterboards.ca.gov/?url=eyoj7>

³⁰ Request for Extension: <https://geotracker.waterboards.ca.gov/?url=cdyr9>

³¹ Remedial Investigation Progress Report No. 4: <https://geotracker.waterboards.ca.gov/?url=vq0y0>

³² Groundwater Monitoring Report: <https://geotracker.waterboards.ca.gov/?url=xt4iq>

³³ Quarterly Status Report No.5 – Third Quarter 2024: <https://geotracker.waterboards.ca.gov/?url=m5ry1>

³⁴ Remedial Investigation Progress Report No. 5: <https://geotracker.waterboards.ca.gov/?url=mz2k4>

³⁵ Quarterly Status Report No. 6 – Fourth Quarter 2024:

<https://geotracker.waterboards.ca.gov/?url=8hzvu>

³⁶ Remedial Investigation Report (Revised): <https://geotracker.waterboards.ca.gov/?url=wgi4z>

³⁷ Email Correspondence – FAA Grant Update: <https://geotracker.waterboards.ca.gov/?url=uq3qd>

³⁸ Quarterly Status Report No. 1 – First Quarter 2025: <https://geotracker.waterboards.ca.gov/?url=gbso8>

³⁹ Technical Memo – Airport Boundary Shallow Carbon Barrier Pilot Test:

<https://geotracker.waterboards.ca.gov/?url=w0laa>

⁴⁰ Water Supply Feasibility Study – Public Draft: <https://geotracker.waterboards.ca.gov/?url=mmt97>

2025 (first quarter 2025). There have not been quarterly status reports submitted for the second or third quarters of 2025.

** The *Remedial Investigation Report* was due on January 21, 2025. An original *Remedial Investigation Report* was submitted on May 1, 2025. A revised version of this report was submitted on August 21, 2025. An Errata Sheet⁴¹ presenting the revisions between the two versions was submitted on September 3, 2025. These documents represent a progress report on implementing the remedial investigation under the VCAA instead of a final report. The Airport Parties continued to implement the remedial investigation scope following the May 1 and revised August 1 *Remedial Investigation Report* submittals. During a Community Advisory Group meeting on November 18, 2025, the Airport Parties indicated that a final Remedial Investigation Report is under review and would be submitted to the Central Coast Water Board in the coming weeks.

Field Activities

Airport Parties have conducted the following field activities since the VCAA ratification:

- Conducted groundwater monitoring and treatment performance monitoring.
- Installed POU treatment systems.
- Tested new and existing POU treatment systems (at approximately 70 locations).
- Performed maintenance on POE treatment systems (e.g., filter media changes).
- Initiated a domestic water sampling plan.
- Tested the effectiveness of 12 existing POE treatment systems and upgraded them where necessary.
- Installed POE at eligible locations (39 total) where PFAS exceeds a drinking water standard, except where access has not been granted by the owner (2 locations). Two additional business locations, where groundwater is not used for drinking purposes, have not committed to a location for POE installation.
- Conducted a remedial investigation which included the installation and sampling of new groundwater monitoring wells, the collection of groundwater grab samples, the collection of multi-depth soil grab samples, stormwater sampling, sediment sampling, and slug testing to assess hydrologic properties. Field activities that were not reported in the Remedial Investigation Report, but are required components of the remedial investigation, include sewer line sediment sampling, 5 additional borings at groundwater monitoring well / groundwater grab sample locations, and the comparison of analytical methods USEPA Method 1633 and USEPA Method 537 using site specific data.
- Installed 6 clustered groundwater monitoring wells and conducted a tracer injection study to facilitate the design of a carbon permeable reactive barrier.

⁴¹ Remedial Investigation Report Errata Sheet: <https://geotracker.waterboards.ca.gov/?url=z9im5>

Public Outreach

The Airport Parties hosted a community meeting to hear public comments on concepts for a draft public participation plan⁴² 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 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. The Airport Parties have hosted CAG meetings, generally on a monthly basis, on October 3, 2023, November 7, 2023, February 13, 2024, March 5, 2024, April 9, 2024, May 21, 2024, August 13, 2024, September 10, 2024, October 22, 2024, November 19, 2024, January 14, 2025, February 25, 2025, April 8, 2025, May 13, 2025, July 29, 2025, and November 18, 2025. The Central Coast Water Board Chair, Executive Officer, Site Cleanup Program Manager and assigned technical staff have routinely attended the CAG meetings.

Airport Parties' Compliance with VCAA

A detailed status of VCAA milestones and deliverables is included in Table 1. San Luis Obispo County and CAL FIRE have made substantial progress and have generally complied with the requirements of the VCAA.

Citing difficulties in gaining timely access at several locations, the Airport Parties requested an extension until August 31, 2024, to complete POE installations. Recognizing that the Airport Parties had made progress and that POU systems were providing filtered drinking water for the impacted community, the Central Coast Water Board granted a six-week extension for installing POE systems.⁴³ This reflects a minor deviation from the VCAA schedule for the installation of POE systems not being installed at all eligible locations by the original July 21, 2024 due date.

On the topic of the human health risk assessment, the Central Coast Water Board's position is that the State Water Resources Control Board's Cleanup and Abatement Policy (Resolution 92-49) cited in the VCAA and various other statements in the VCAA means that testing for total PFAS (PFAS in excess of 42 target analytes that are quantified by the Airport Parties' laboratory) is required for investigation, remediation planning, for incorporating total PFAS results into a human health risk assessment, and for water treatment system evaluation. After several staff comment letters on the remedial investigation work plan, associated revisions, and meetings between Central

⁴² Handout of public participation plan ideas for August 28, 2023, public meeting: <https://geotracker.waterboards.ca.gov/?surl=udpkk>

⁴³ Letter granting extension: <https://geotracker.waterboards.ca.gov/?surl=gh4z9>

Coast Water Board staff and Airport Parties, the Airport Parties provided a plan to test for total PFAS as part of the remedial investigation. However, there has been disagreement on how the information will be used in the human health risk assessment. Specifically, Airport Parties have stated they don't wish to use surrogate values in a risk assessment for PFAS without toxicological data, but instead intend to explain risk from total PFAS qualitatively. Central Coast Water Board staff disagree with this approach and recommend that surrogate data be used in calculations to make better-informed risk-based decisions. In the case where there is no quantified evaluation of total PFAS risk and/or for individual PFAS without toxicological data, and if a qualitative analysis cannot reasonably demonstrate that risk is sufficiently low, then the maximum feasible cleanup and abatement measures will need to be implemented for all potential exposure pathways by the Airport Parties.

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. Formation of a Community Advisory Group

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

Status: This action is completed. The Airport Parties have formed a CAG and hosted nine CAG meetings (as of October 2024), with additional CAG meetings planned for the first Tuesday of each month.

2. 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 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 would 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.

During the October 2024 CAG meeting, county officials stated that they will be sending reimbursement checks within two weeks. Community members also brought up during the September and October 2024 CAG meetings that POE filters cause an increase in electrical and pump maintenance costs resulting from the filter mechanism's added resistance to water flow. Airport Parties stated that they will consider reimbursing for added electrical and maintenance costs. During the April 8, 2025 CAG meeting, the Airport Parties stated that these costs were not addressed in the VCAA and that the Airport Parties do not plan to provide reimbursement.

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 and suggested 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.⁴⁴

At the request of the CAG, members of the San Luis Obispo County Public Health Department (Health Officials) attended the October 2024 CAG meeting to discuss topics including conducting a health survey and the Human Health Risk Assessment. Health Officials explained why they believe that the Airport area impacted community is too small for conducting a health survey. Their research indicates that reviewed published surveys consist of approximately 5,000 impacted individuals along with 5,000 individuals serving as a control group, much larger than the Airport area impacted community. Their main message was that the most important thing for the community is to reduce exposure to PFAS, particularly from ingesting PFAS-impacted water, which is the main route of exposure. In addition, Health Officials stated that the upcoming Human Health Risk Assessment will likely address many of the community's concerns.

⁴⁴ 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>

During the October 2024 meeting, the topic of blood testing for PFAS was discussed and whether the Airport Parties would pay or reimburse community members for PFAS blood testing. A community member (who lives in the area of highest PFAS detected in domestic wells) had their blood tested. The lab results reported that the blood contained elevated concentrations of PFAS, including primarily PFOS, PFOA, and PFHxS, which are consistent with the PFAS discharged from the Airport. Airport Parties stated that they would consider the request to provide blood testing. During the April 8, 2025 CAG meeting, the Airport Parties stated blood testing was not addressed in the VCAA and that they would not be providing blood testing or reimbursement for blood testing for community members.

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 paragraphs are intended 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.

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 are expected to be evaluated as part of the San Luis Obispo County Regional Airport HHRA include ingestion of PFAS impacted groundwater (for PFAS with and 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. During the October 22, 2024, CAG meeting, a community member requested that inhalation and other exposure routes associated with mist produced by nearby, upwind, farm irrigation sprinklers also be incorporated into the HHRA.

Section 4.4 of the VCAA requires that the Airport Parties submit an HHRA to the Central Coast Water Board by January 21, 2025. The VCAA requires that the HHRA evaluates risk for all PFAS (not just for target analytes and/or analytes with a drinking water standard or toxicological information), including total PFAS, and that it evaluates risk for all potential pathways of exposure. 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 PFAS case. Central Coast Water Board staff have coordinated with OEHHA and requested that their toxicologists peer review the HHRA when it is complete. Based on feedback from OEHHA, modifications to the HHRA were made and a revised draft was submitted to the Central Coast Water Board on September 25, 2025. On October 30, 2025, Central Coast Water Board staff communicated via email to the Airport Parties that we had no further comments on the draft HHRA. Submittal of a final version of the HHRA by the Airport Parties is pending.

Section 3.9 of the VCAA 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.

To the extent evaluation of total PFAS or any specific PFAS compound risk cannot be or is not adequately evaluated in the HHRA, the Airport Parties will be required to implement cleanup and abatement measures to the maximum extent feasible, consistent with State Board Resolution 92-49, as referenced in the VCAA.

FAA Grant-Funded Pilot Projects

In September 2024, the San Luis Obispo County Airport was awarded approximately \$3.5 million in grant funding by the Federal Aviation Administration (FAA) to conduct pilot testing and field demonstrations of technologies/projects to address PFAS impacts in soil and groundwater. The Airport Parties selected four pilot projects which include:

- PFAS Groundwater Sparging Test – This study will evaluate the effectiveness of in-well air sparging techniques and foam recovery of PFAS in the shallow perched groundwater aquifer within the source area.
- Biological Treatment PFAS Destruction Study – This pilot project will evaluate the effectiveness of microbes in the destruction of PFAS in site-specific soil and groundwater samples.
- Side-by-Side PFAS Removal Media Comparison – This pilot project will evaluate the performance of several PFAS removal media under near-identical conditions to determine the most cost-effective method to treat this specific well water.

- Airport Boundary Shallow Aquifer Carbon Barrier – This pilot project includes the design, installation, and monitoring of an activated carbon permeable barrier along a portion of the southwestern airport boundary between the primary source area(s) and the most impacted private wells in the nearby community. It will serve as an in-ground filter to remove PFAS from groundwater as it flows from the airport toward community wells.

In a status update during the November 18, 2025 CAG meeting, the Airport parties stated that all four of these pilot projects are in progress and that the side-by-side media comparison project is nearly complete.

Conclusion

Significant progress has been made since ratification of the VCAA in July 2023. The most significant milestone has been the installation or modification of 51 POE systems to filter PFAS from water at residences and businesses in the community, providing a level of relief from PFAS exposure. Several other important tasks are underway including (1) evaluation of the feasibility for a long-term water solution and (2) investigation work that will inform a human health risk assessment and the feasibility of various remediation options.

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. Records of the San Luis Obispo County Regional Airport case, including regulatory activities and environmental data are available on GeoTracker:

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 24, 2025

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.
Quarterly	Quarterly Status Update Reports	Ongoing	<p>(2.3) Airport Parties agreed to provide Quarterly Status Update Reports regarding the progress of the tasks completed under the VCAA. Reports include PFAS analytical data from monitoring of private well treatment systems.</p> <p>First seven quarterly status reports received for Q3, 2023 through Q1, 2025 (ranging from 1 to 6 months following the end of each quarter)</p> <p>Q2 2025 status report not received (as of four months after quarter)</p> <p>Q3 2025 status report not received (as of one month after quarter)</p> <p>Ongoing receipt of laboratory results, including from September 2024 sample collection</p>

Due Date	Milestone / Deliverable	Status	Notes/Description
8/20/2023	Point-of-Use (POU) Treatment Offer Letters	Completed	(3.2.1) Airport Parties to offer POU treatment (locations with a PFAS standard exceedance and without existing treatment). This task is complete. At some locations, affected parties deferred POU for point of entry (POE) systems, were unresponsive, or declined the POU treatment offer. Airport Parties have tested and verified treatment effectiveness at approximately 70 POU locations.
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 work plan concurrence letter on October 17, 2023.
11/16/2023	Domestic Water Sampling Plan Implementation	Ongoing	(3.4) Airport Parties agreed to implement the Domestic Water Sampling Plan within 30 days of Central Coast Water Board approval. Status: all identified and accessible wells (74) have been sampled for PFAS one or more times.

Due Date	Milestone / Deliverable	Status	Notes/Description
8/28/2023	Community Outreach Meeting	Completed	(3.9) Airport Parties held an 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	Completed	(3.9) Airport Parties submitted a Public Participation Plan to the Central Coast Water Board on September 4, 2023. The Central Coast Water Board provided feedback on the plan on October 18, 2023, and requested submittal of a revised public participation plan. A revised public participation plan was submitted on November 3, 2023. The Central Coast Water Board concurred with the revised plan on February 5, 2024.

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 October 3, 2023, November 7, 2023, December 12, 2023, February 13, 2024, March 5, 2024, April 9, 2024, May 21, 2024, August 13, 2024, September 10, 2024, and October 22, 2024, November 19, 2024, January 14, 2025, February 25, 2025, April 8, 2025, May 13, 2025, July 29, 2025, and November 18, 2025. Future meetings are planned.
10/19/2023	Point-of-Entry (POE) Treatment Evaluation Work Plan	Completed	(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. Central Coast Water Board staff concurred with the work plan on December 12, 2023.

Due Date	Milestone / Deliverable	Status	Notes/Description
120 days after approval of POE Treatment Evaluation Work plan	POE PFAS Treatment Report	Completed	(3.7) Airport Parties submitted a POE PFAS Treatment Report on April 10, 2024, on schedule. The report presents a tally of surveyed wells, including statistics on numbers of wells exceeding a PFAS drinking water standard, POE eligibility, status of POE, and engineering design/selection of POE filtration technology. Central Coast Water Board staff responded to the report on May 24, 2024.
60 days after approval of POE PFAS Treatment Report	POE Treatment Implementation	Completed	(3.8) Airport Parties agreed to begin POE implementation within 60 days of Central Coast Water Board approval of the POE PFAS Treatment Report. The original deadline for POE treatment installations was July 21, 2024; however, an extension to August 31, 2024, was granted. Airport Parties have completed POE installations at all eligible locations, except for 2 locations where owners have not granted access or scheduled a POE installation date. At two business locations, installation awaits approval by owners of proposed treatment designs; however, the water is not used for drinking at those locations.

Due Date	Milestone / Deliverable	Status	Notes/Description
9/19/2023	Groundwater Monitoring Event – Initial Sampling Semiannual Groundwater Monitoring and Sampling Laboratory Reports from domestic wells (typically submitted within 60 days of sampling)	Completed	(3.10.1) Airport Parties agreed to perform an initial sampling of 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. Ongoing monitoring: Initial report submitted March 4, 2024; second report October 18, 2024; third report February 14, 2025.
10/19/2023	Groundwater Monitoring Plan	Completed	(3.10.2) Airport Parties submitted a Groundwater Monitoring Plan on October 19, 2023, that establishes the schedule/frequency for subsequent groundwater monitoring and reporting. Staff concurred with the plan on February 5, 2024.
10/19/2023	PFAS Site Conceptual Model	Completed	(3.11) Airport Parties agreed to update the PFAS Site Conceptual Model to include maps and geologic/hydrogeologic cross-sections. The Site Conceptual Model describes the distribution of PFAS in the subsurface and provides an evaluation of potential migration pathways. Staff completed review of the Site Conceptual Model on January 1, 2024.

Due Date	Milestone / Deliverable	Status	Notes/Description
11/18/2023	Remedial Investigation (RI) Work Plan	Submitted on time; underwent review/revisions	(3.12) Airport Parties initially submitted a work plan on November 18, 2023, to delineate Airport-Related PFAS in soil, sediments, and groundwater. The purpose of the RI is to gather additional data to support the preparation of a Human Health Risk Assessment (HHRA) and inform remedial approaches to address the impacts of Airport-Related PFAS. Since staff's initial comment letter on January 4, 2024, two additional comment letters were sent responding to revised work plans, with a partial concurrence letter sent to Airport Parties on April 9, 2024. The remaining item of disagreement was a lack of total PFAS sampling and analysis in the work plan. Airport Parties submitted a total PFAS sampling and analysis plan on September 11, 2024. Staff conditionally concurred with the plan on October 4, 2024.
11/18/2023	"Phase II" Water Supply, Replacement Water/Treatment Alternatives Evaluation Work Plan	Submitted on time	(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.

Due Date	Milestone / Deliverable	Status	Notes/Description
4/16/2024	PFAS Feasibility Study/Remedial Action Plan (FS/RAP) Work Plan	Submitted on time	(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. This work plan summarizes select guidance documents for developing a FS/RAP (mostly under CERCLA) and conceptually proposes content for the upcoming FS/RAP.
1/21/2025	Remedial Investigation Report	Partial Completion	<p>(4.3) Report summarizing the findings of the RI. Airport Parties have submitted two RI progress reports.</p> <p>Partial report submitted May 21, 2025, and revised on August 21, 2025. (The report did not document all required tasks and technical analysis specified in the conditionally-approved RI work plan. During a November 18, 2025, Community Advisory Group meeting the Airport Parties stated that a complete remedial investigation report is under review and would be submitted to the Central Coast Water Board in the coming weeks.)</p>
1/21/2025	Human Health Risk Assessment	Incomplete	(4.4) Airport Parties agreed to submit a Human Health Risk Assessment (HHRA) report evaluating the risk from Airport-Related PFAS. Draft documents were submitted on December 19, 2024; April 25, 2025; and September 25, 2025.

Due Date	Milestone / Deliverable	Status	Notes/Description
1/21/2026	Feasibility Study	Not due yet	(4.5) Airport Parties agreed to submit a Report summarizing the findings of the FS.
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	Ongoing	(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 (e.g., public water system). (A Public Draft of the Water Supply Feasibility Study was submitted on November 13, 2025) ⁴⁵
7/21/2027	Well-Head Treatment System Installation	Not due yet	(4.6.4) Well-head treatment to be installed if the result of the long-term water supply evaluation is that a public water supply system is infeasible. To be determined.

⁴⁵ Water Supply Feasibility Study – Public Draft: <https://geotracker.waterboards.ca.gov/?surl=mmt97>