



Public Health Department

Jeff Hamm
Health Agency Director

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Public Health
Prevent. Promote. Protect.

March 14, 2017

Chris Mathys
Rhine LP & CVI Group, LLC
Oro Financial of California, Inc.
2304 W. Shaw Ave, Suite 102 | Fresno, CA 93711

RE: FORMER NAVY JET FUEL STORAGE SITE, 3300 PANORAMA RD., MORRO BAY, CA, ABOVE GROUND STORAGE TANK DEMOLITION PLAN REVIEW

On February 21, 2017, a revised demolition work plan was submitted to San Luis Obispo (SLO) Environmental Health Services (EHS). We have compared the documents provided to our August 8, 2016 direction letter, and have determined the plan is compliant and includes the following:

- Compliant Hazardous Materials Storage Tank System Cleaning/Cutting permit application
- Pre-demolition tank and piping degassing and vapor monitoring plan, developed by a Certified Industrial Hygienist
- Removal of all underground piping
- Site map identifying underground and aboveground piping
- Soil Management and Sampling plan, prepared by a professional geologist, specific to demolition phase of project
- Hazardous Waste Contingency plan
- Lead abatement compliance plan for the tanks

The work plan is approved with the following conditions:

- Schedule with the agency and Morro Bay City fire a pre-demolition safety meeting to ensure all safety measures are in place, and pre-demo safety meeting for workers has been conducted and documented.
- Inspections to be scheduled with SLO EHS inspector: Certification of safe atmosphere in tanks and piping before demolition, Inspect piping before removal, soil sampling beneath removed piping .

- Provide copies of tank and piping atmosphere monitoring documentation to SLO EHS, confirming the atmosphere is safe and non-explosive, before demolition.
- Provide copies of all soil sample lab analysis to agency prior to contaminated soil disposal.
- Consult with the agency and provide justification for approval before closing any pipeline in place.
- Submit copies of waste disposal manifests, signed by the (spell out) TSD, within 45 days after disposal.

The approved work plan is specific to the tank and piping removal and demolition, and soil sampling plan is approved for the demolition phase of the project.

The work plan shall be implemented within 1 year of approval. Any changes to the approved work plan and approved Aboveground Storage tank removal permit require approval of this agency

Post demolition, SLO EHS requires the applicant to submit:

- A soil assessment report from the AGT system removal that complies with all applicable guidance from CalEPA and USEPA, particularly the Department of Toxic Substances (DTSC) Preliminary Environmental Assessment (PEA) Manual
- A Phase 1 Environmental Assessment
- A work plan to perform a Phase 2 Environmental Assessment that includes environmental sampling and soil gas sampling for volatile organic compounds (VOCs) that comply with the DTSC Soil Gas Investigation Advisory, 2012.
- A Phase 2 Environmental Assessment Report
- Human Health Risk assessment that complies with all applicable guidance from CalEPA and USEPA.

Potential, additional, future reports and assessment to include but not limited to:

- Remediation Action Plan (RAP). A RAP may be required if environmental sampling indicates a potential unacceptable risk to future residents exists. A RAP will need approval from the agency in charge of remediation oversight, the City of Morro Bay, the County Air Pollution Control District, the Coast Commission, and would require a CEQA evaluation.

Cost for oversight:

This agency is required to recover its personnel costs associated with oversight at \$115 per hour. This agency also utilizes professional services to evaluate the referenced specialized reports and work plans. Specialists are contracted at a

prevailing rate from \$140 to \$190 per hour depending on what specialist is required.
The property owner is invoiced for these costs on a monthly basis.

Please contact me at (805) 781-1105 (tatkings@co.slo.ca.us.) regarding the tank closure
and contact Aaron LaBarre for all other questions at 805-781-5595
(alabarre@co.slo.ca.us).

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia Atkins', with a long horizontal flourish extending to the right.

Patricia Atkins, REHS
Environmental Health Specialist III
Hazardous Materials Program

C: Whitney McIlvaine, Planner, Community Development Dept., Morro Bay
Tom Prows, Fire Marshal, City of Morro Bay Fire Department
Tim Fuhs, Air Quality Specialist, County Air Pollution Control District