



# COUNTY OF SAN LUIS OBISPO HEALTH AGENCY

## Public Health Department

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**Public Health**  
Prevent. Promote. Protect.

March 14, 2017

City of Morro Bay  
Planning Commission  
Veteran's Memorial Building  
209 Surf Street  
Morro Bay, CA 93442

**Re: City of Morro Bay Planning Commission action on January 3, 2017 on Coastal Development Permit CP0-500 and Conditional Use Permit Up0-440 application for a project at 3300 Panorama Street APN: 065-038-001**

Morro Bay Planning Commission:

San Luis Obispo County Environmental Health Services (EHS) has reviewed the January 11, 2017 letter from Whitney McIlvaine, Contract Planner, Morro Bay City Community Development, to Chris Mathys regarding the above listed coastal permit application. The letter lists the concerns of the Morro Bay Planning Commission related to the demolition work plan for the above ground tank system and the soil contamination assessment and remediation plan, which were stated at the January 3, 2017 Planning Commission meeting.

It is our understanding the Planning Commission is requiring the applicant to prepare a Soil Contamination Assessment and Remediation Plan, and a detailed Demolition Work Plan.

Our agency has required soil sampling in two separate phases in this project, both follow the tank and piping removal, not beforehand. The two phases are described in a June 24, 2016 letter to the applicant from EHS Haz Mat Supervisor, Aaron LaBarre. This included a soil sampling plan for the demolition and site assessment for redevelopment, post-demolition.

Performing additional sampling before the tanks and piping are removed will not produce a complete set of data our agency will need to assess impacts to the environment and future inhabitants.

To provide accurate data on current levels of contamination at the site, piping and structures need to be removed first and then sampled beneath removed components. EHS has required the applicant to submit a compliant Aboveground Storage Tank removal permit application, which includes a detailed demolition work plan.

On February 21, 2017 the applicant submitted a compliant aboveground storage tank demolition permit application, that including the following:

- 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

Post demolition, SLO EHS requires the applicant to submit:

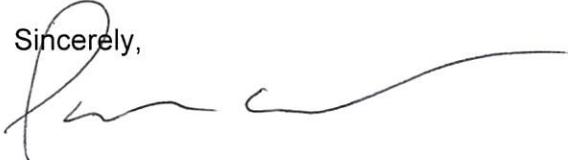
- A soil assessment report from the AGT system removal that complies with all applicable guidance from CalEPA and USEPA, particularly the Department of Toxic Substances (DTSC) Preliminary Environmental Assessment (PEA) Manual
- A Phase 1 Environmental Assessment
- A work plan to perform a Phase 2 Environmental 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:

- Further soil and environmental media assessment
- Additional Human Health Risk assessment that complies with all applicable guidance from CalEPA and USEPA.
- 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.

Please call me at 805-781-1105, or email me at: [tatkings@co.slo.ca.us](mailto:tatkings@co.slo.ca.us), if you have any questions or concerns.

Sincerely,

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

Patricia Atkins, R.E.H.S.  
Hazardous Material Program  
San Luis Obispo County Environmental Health Services

C: Whitney McIlvaine, Planner, City of Morro Bay

Enc: June 24, 2016 and August 8, 2016 EHS direction letters, SLO EHS AGT Demolition permit application and work plan approval letter.