



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mobil Gasoline Station Site, Pacific Palisades Draft Response Plan

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document and would like to be included in future public participation activities associated with the cleanup effort. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance of the project start to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of operation. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised or Final Response Plan, as appropriate.

The Response Plan involves the demolition and removal of five underground storage tanks and excavation of contaminated soil. The proposed plan also involves the redevelopment of the site as a mixed use building with subterranean parking. The past remedial investigations indicated that soil and groundwater are contaminated with Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOCs). Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing. Rule 1149 should be incorporated during the development of the Final Response Plan.

Additionally, the Lead Agency did not quantify the project construction emissions. The SCAQMD staff recommends estimating project construction emission impacts and comparing those estimates with the SCAQMD recommended regional and localized thresholds of significance. Demolition and excavation of the site can be estimated using the California Emissions Estimator Model (CalEEMod)¹ land use emissions model or by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the in the SCAQMD's CEQA Air Quality Handbook.²

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final Response Plan associated with this project.

Sincerely,

Jillian Wong

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¹ CalEEMod website at: <http://www.caleemod.com>

² SCAQMD website: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993))