



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Class 1 Permit Modification for Industrial Service Oil Company, Inc (Facility)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the July 2023 Public Notice of a Class 1 Permit Modification, Industrial Service Oil Company, Inc. (Facility) submitted a Class 1 Permit Modification to Department of Toxic Substances Control (DTSC) requesting a revision to an approved closure plan and closure cost estimate to include two newly constructed tanks (Tanks 44 and 45). As part of its operations, the Facility receives hazardous wastes from offsite generators and other treatment, storage, and disposal facilities.¹ The Facility also stores, treats, and transports onsite generated wastes. Furthermore, the Facility conducts treatment and storage of wastewater and used oil in tanks. According to the Facility's Class 1 Permit Modification Request, Tanks 44 and 45 will receive organic liquids and have a maximum capacity each of 20,150 gallons (40,300 gallons total).² Tanks 44 and 45, along with related piping, pumps, and other parts, will be located in a secondary containment area, which is provided by a concrete pad and reinforced concrete and reinforced masonry walls.³ The Facility is located at 1700 South Soto Street near the northeast corner of South Soto Street and East Washington Boulevard in the City of Los Angeles.

In the event that any existing equipment would be dismantled and removed as part of the closure per the project description, requirements of South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities would apply and should be discussed in the closure plan and the final DTSC permit modification.⁴ If the closure plan would involve earth-moving activities of contaminated soil greater than 50 cubic yards, and if soil is contaminated with any of the toxic air contaminants listed in Table I of South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, it is recommended that the closure plan include clarifications on if DTSC or other agencies listed in Rule 1466(b) have designated or plan to designate the Site for the contaminant listed as a concern. More

¹ DTSC EnviroStor. Public Notice to Mailing List by Permittee. Public Notice of Class 1 Permit Notification. 7/8/23. Accessed here:

https://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report?global_id=CAD099452708

² DTSC EnviroStor. Modification Notification / Class Determination Request. 7/3/23. Page 2 of 98. Accessed here:

https://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report?global_id=CAD099452708

³ DTSC EnviroStor. Final Permit Renewal. Final RCRA Equivalent Permit - ISOCI. Effective Date 6/2/23. Page 47 of 65. Accessed here:

https://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report?global_id=CAD099452708

⁴ South Coast AQMD Rule 1403. Accessed at:

<http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

information on Rule 1466 requirements is available on the South Coast AQMD's website.⁵ Additionally, if the closure would involve any activity such as demolition or soil movement capable of generating fugitive dust, requirements of South Coast AQMD Rule 403 – Fugitive Dust, will apply and should also be discussed in the closure plan and the final DTSC permit modification.⁶ Finally, South Coast AQMD's Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, may also be applicable.⁷ This rule requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of an underground storage tank or piping which has stored volatile organic compounds.

If you have any questions or wish to discuss the comments, please feel free to contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

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⁵ South Coast AQMD. Compliance. Rule 1466. Accessed at:
<http://www.aqmd.gov/home/rulescompliance/compliance/rule-1466>

⁶ South Coast AQMD Rule 403. Accessed at:
<http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>

⁷ South Coast AQMD. Rule 1166. Accessed at:
<http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule1166.pdf>