



Air Pollution Control District  
San Luis Obispo County

April 12, 2016

Whitney McIlvaine  
City of Morro Bay  
955 Shasta Avenue  
Morro Bay, CA 93442

SUBJECT: APCD Comments Regarding the Rhine, L.P. / Morro 94, LLC Fuel Tank  
Demolition Project Referral (CP0-500 and UP0-440)

Dear Ms. McIlvaine:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at 3300 Panorama Drive in Morro Bay. The project as proposed involves demolition of two (2) empty fuel tanks and one (1) water tank along with associated pumps and structures that were used by the Navy to store and transport jet fuel. *The following are APCD comments that are pertinent to this project.*

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

**DEMOLITION/CONSTRUCTION PHASE IMPACTS - Below Threshold**

The APCD evaluated the demolition/construction impacts of this project using the most recent CalEEMod computer model for estimating construction emissions related to the development of land uses. The modeling results indicate that the demolition/construction phase impacts will likely be less than the APCD's significance threshold values identified in Table 2-1 of the CEQA Air Quality Handbook (available at the APCD web site: [www.slocleanair.org](http://www.slocleanair.org)). **Therefore, with the exception of the requirements below, the APCD is not requiring other demolition/construction phase mitigation measures for this project.**

Demolition/Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present and operations that may occur during the project's demolition/construction phase. Portable equipment, 50 horsepower (hp) or greater, may require California