SENT VIA E-MAIL: August 11, 2021

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

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. The following comments on the South Coast AQMD rules and permit requirements should be considered by the Department of Toxic Substances Control (DTSC) and included in the Class 1 Permit Modification.

South Coast AQMD Staff's Summary of the Class 1 Permit Modification

According to the Public Notice, DTSC was requested to modify the facility's existing hazardous waste storage permit for the construction of two identical vertical tanks that DTSC has previously permitted. 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, California.

South Coast AQMD Staff's Comments

Construction and operation of tanks require written permits from South Coast AQMD, unless they are exempt from the written permit requirements under South Coast AQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II¹, subparagraph (m). Therefore, it is recommended that DTSC review South Coast AQMD Rule 219 prior to approval of the modifications to the facility's Class 1 Permit. If construction and operation of tanks are not exempt, complete and timely permit applications for a Permit to Construct and a Permit to Operate will be required under South Coast AQMD Rule 201 – Permit to Construct² and Rule 203 – Permit to Operate³.

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

Sincerely,

Lijin Sun

Lijin Sun Program Supervisor, CEQA IGR Planning, Rule Development and Area Sources

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¹ South Coast AQMD. Rule 219. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf.

² South Coast AQMD Rule 201. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf.

³ South Coast AQMD Rule 203. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf.