



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Removal Action Workplan (RAW) and Negative Declaration (ND) for San Pedro Boat Works

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned documents and would like to be included in future public participation activities associated with the cleanup effort at the San Pedro Boat Works (Site, Facility, or Project) that is located at Berth 44 within the Port of Los Angeles. The purpose of the Draft RAW¹ is to excavate, transport, and off-site dispose soil contaminated with metals, total petroleum hydrocarbons, polynuclear aromatic hydrocarbons, and polychlorinated biphenyls on 3.07 acres. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final RAW and the Air Quality Section of the Final ND, as appropriate.

1. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, South Coast AQMD Engineering and Permitting staff who can be reached at (909) 396-3385 should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by South Coast AQMD prior to start of any removal activity.
2. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil². South Coast AQMD Rule 1166 should be incorporated during the development of the Final RAW and the Final ND, where appropriate. Furthermore, the Final RAW and the Final ND should also discuss how the cleanup activities will comply with South Coast AQMD Rule 402 – Nuisance³, if VOCs and/or odors are emitted during soil disturbance activities.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190321-01
Control Number

¹ The DTSC has determined that the environmental impacts associated with the cleanup actions would be less than significant, and as a result, a Negative Declaration has been prepared for the Draft RAW.

² South Coast Air Quality Management District. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

³ South Coast Air Quality Management District. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.