



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

May 14, 2019

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Interim Measures Workplan for Former Northrop Grumman East Complex

The South Coast Air Quality Management District (South Coast AQMD) 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 at the Former Northrop Grumman East Complex (Site, Facility, or Proposed Project). The purpose of the Interim Measures Workplan (Workplan)¹ is to remove volatile organic compounds (VOCs) in groundwater and soil at the site. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, South Coast AQMD staff 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 remedial activity. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Workplan, as appropriate.

As stated above, VOCs are found in groundwater and soil. 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 Workplan. Furthermore, the Workplan should also discuss how the remedial measures will comply with South Coast AQMD Rule 402 – Nuisance³, in the event that the 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

LAC190501-08

Control Number

¹ The Department of Toxic Substances Control (DTSC) has reviewed the cleanup measures proposed in the Interim Measures Workplan for the Site and determined that the cleanup measures are not expected to result in any significant adverse impacts on human health and the environment triggering. As such, the DTSC has prepared a Notice of Exemption for the Interim Measures Workplan.

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

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