



South Coast Air Quality Management District

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Draft Response Plan for the Long Beach Industrial Park Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. In the Community Update for the Draft Response Plan, the Department of Toxic Substances Control (DTSC) is developing cleanup actions to excavate, consolidate, and cover soil contaminated with petroleum hydrocarbons, volatile organic compounds, and metals, install soil vapor extraction systems and groundwater monitoring wells, and implement a land use covenant to require monitoring and soil management for future development on a 14-acre site (site) that is located at 3701 North Pacific Place on the northeast corner of Los Angeles River and Interstate 405 in the City of Long Beach within the designated AB 617 Wilmington, Carson, West Long Beach community.

Due to the presence of metals in soil, it is recommended that the Final Response Plan includes clarification on whether the DTSC, or other agencies listed in South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants¹ have designated, or plan to designate the site for any of the toxic air contaminant(s) that are subject to Rule 1466. It is recommended that the Final Response Plan include applicable Rule 1466 requirements if the site is so designated. Moreover, due to the presence of petroleum hydrocarbons and volatile organic compounds in soil, the DTSC should ensure that excavation and soil movement operations comply with requirements of South Coast AQMD Rule 1166 – Volatile Organize Compound Emissions from Decontamination of Soil². The Final Response Plan should also address Rule 1166 requirements, which include, but are not limited to, notification and obtaining of a required soil mitigation plan prior to soil handling activities. Furthermore, written South Coast AQMD permits for certain structures and equipment that may be used for the proposed cleanup actions are not required and can be exempt under South Coast AQMD Rule 219 (c)(10) and (11)³. Therefore, it is recommended that the DTSC review all permit requirements before installing or operating equipment at the site.

If you have any questions or wish to discuss the comments, please contact me at lsun@aqmd.gov or Ms. Amanda Sanders, Air Quality Analysis and Compliance Supervisor, at asanders@aqmd.gov.

Sincerely,

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¹ South Coast AQMD. Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

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 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.