SENT VIA E-MAIL:

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Adam Daniels
Department of Toxic Substances Control
Permitting Division
9211 Oakdale Avenue
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## Class 1 Permit Modification for Veolia ES Technical Solutions, LLC

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the Public Notice of Modification, the Department of Toxic Substances Control (DTSC) is evaluating modifications to an existing hazardous waste facility permit for Veolia ES Technical Solutions, LLC to change emergency contact information, update operational units, improve loading, unloading, and sampling areas, and use electronic method for data collection and retention. Veolia ES Technical Solutions, LLC is located at 1704 West First Street near the southwest corner of South Motor Avenue and West First Street in the City of Azusa. Any changes made to process equipment permitted by South Coast AQMD should be reviewed for applicability of South Coast AQMD Rule 201¹ and Rule 203². Additionally, if the modifications include improvement to facility areas requiring renovation to the facility or facility components, the improvement activities should consider applicability of U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos³ and South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities⁴, and if applicable, comply with the requirements.

If you have any questions or wish to discuss the comments, please contact me at <a href="mailto:lsun@aqmd.gov">lsun@aqmd.gov</a>, Mr. John Anderson, Air Quality Analysis and Compliance Supervisor, at <a href="mailto:janderson@aqmd.gov">janderson@aqmd.gov</a>, or Ms. Amanda Sanders, Air Quality Analysis and Compliance Supervisor, at <a href="mailto:asanders@aqmd.gov">asanders@aqmd.gov</a>.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/AS/JA <u>LAC201124-10</u> Control Number

<sup>&</sup>lt;sup>1</sup> South Coast AQMD Rule 201 – Permit to Construct. Accessed at: <a href="http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf">http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf</a>.

<sup>&</sup>lt;sup>2</sup> South Coast AQMD Rule 203 – Permit to Operate. Accessed at: <a href="http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf">http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf</a>.

<sup>&</sup>lt;sup>3</sup> 40 CFR, Chapter 61, Subpart M. Accessed at: http://www.swcleanair.org/docs/misc/NES\_Asbestos.pdf.

<sup>&</sup>lt;sup>4</sup> South Coast AQMD. Rule 1403. Accessed at: <a href="http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf">http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf</a>.