



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Removal Action Workplan (RAW) for SLF-Five Points Whittier**

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 RAW, the Department of Toxic Substances Control (DTSC) is developing cleanup actions to excavate and remediate contaminated soil with perchloroethylene (PCE), benzene, arsenic, and lead, installation of a vapor intrusion mitigation system (VIMS), and a land use covenant to prevent unauthorized alteration of VIMS on a 2.25-acre site (site) that is located at 8102 and 8104 Santa Fe Springs Road on the southwest corner of Whittier Boulevard and Santa Fe Springs Road in the City of Whittier.

Arsenic and lead are among the applicable toxic air contaminants listed in South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>1</sup>. It is recommended that the Final RAW includes clarification on whether the DTSC, or other agencies listed in Rule 1466(b), have designated, or plan to designate, the site for the contaminant listed as a concern subject to Rule 1466. Since more than 50 cubic yards of contaminated soils are to be excavated, the site would be subject to South Coast AQMD Rule 1466 requirements if designated pursuant to the provisions of 1466(b)(1). It is recommended that the Final RAW include applicable Rule 1466 requirements if the site is so designated. The Final RAW should also ensure excavation and soil movement operations will comply with South Coast AQMD Regulation IV-Prohibitions<sup>2</sup>, such as Rule 401 – Visible Emissions<sup>3</sup>, Rule 402 – Nuisance<sup>4</sup>, and Rule 403 – Fugitive Dust<sup>5</sup>. Furthermore, due to the presence of benzene and PCE contamination, the site is subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organize Compound Emissions from Decontamination of Soil<sup>6</sup> that the DTSC should discuss in the Final RAW.

If you have any questions or wish to discuss the comments, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) or Mr. John Anderson, Air Quality Analysis and Compliance Supervisor, at [janderson@aqmd.gov](mailto:janderson@aqmd.gov).

Sincerely,

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LS/JA

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

<sup>2</sup> South Coast AQMD. Regulation IV. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-iv>.

<sup>3</sup> South Coast AQMD. Rule 401. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

<sup>4</sup> South Coast AQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

<sup>5</sup> South Coast AQMD. Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>6</sup> South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.