SENT VIA E-MAIL:

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## <u>Draft Removal Action Workplan</u> 410 E. 32nd Street and 317 E. 33rd Street

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. Based on the Department of Toxic Substances Control's (DTSC) Clean Up Program Community Update in October 2022, the DTSC's draft Removal Action Workplan (RAW) that was proposed for the Site at 410 E 32nd Street and 317 E 33rd Street in Los Angeles, California.

The Site is approximately 0.37 acres in size and is developed with a 14,300 square foot warehouse. The RAW describes the environmental studies that have been conducted at the Site and activities proposed to remediate elevated Volatile Organic Compounds (VOCs) present in the soil vapor beneath the Site and extend beyond the Site boundaries. A Soil Vapor Extraction (SVE) is proposed for the Site for the Pilot Test to continue operate until cleanup goals are met and the samples will be collected at intervals during the remediation and after it is complete.

Due to the presence of VOCs in soil, requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>1</sup> will apply and should be discussed in the final workplan. A Rule 1166 compliance plan will be required. Additionally, since the proposed remedial actions would involve the installation and use of a SVE system, complete and timely permit applications for a Permit to Construct and a Permit to Operate for the SVE system will be required under South Coast AQMD Rule 201 – Permit to Construct<sup>2</sup> and Rule 203 – Permit to Operate<sup>3</sup>.

If you have any questions or wish to discuss the comments, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

<sup>1</sup> South Coast AQMD. Rule 1166. Accessed at: <a href="http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf">http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf</a>.

<sup>&</sup>lt;sup>2</sup> South Coast AQMD Rule 201. 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>3</sup> South Coast AQMD Rule 203. 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>.

## Planning, Rule Development & Implementation

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