



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
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SENT VIA E-MAIL:

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[Ahmad.Aboughaida@dtsc.ca.gov](mailto:Ahmad.Aboughaida@dtsc.ca.gov)

Ahmad Aboughaida, DTSC Project Manager  
DTSC Cypress Regional Office  
5796 Corporate Avenue  
Cypress, CA 90630

## **Draft Removal Action Workplan (RAW) for the Mountain Square Cleaners Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the Community Update, the Draft RAW is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to address soil vapor contaminated with tetrachloroethylene (PCE) and other volatile organic compounds (VOCs) at a site located near the northeast corner of South Mountain Avenue and State Route 10 in the City of Upland, California. The purpose of this workplan is to evaluate and propose four distinct removal action alternatives for the site cleanup. The following cleanup alternatives are proposed for the Site: 1) No Further Action; 2) Soil Vapor Extraction (SVE) with potential Sub-slab Depressurization (SSD) and Land Use Covenant (LUC); 3) Excavation of Chemical-Affected Soil with a potential LUC; and 4) Long Term Monitoring with a LUC.<sup>1</sup> After evaluating the four alternatives, DTSC selected alternative #2 for additional analysis.

Due to the presence of VOCs in soil vapor, ensuring compliance with South Coast AQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil,<sup>2</sup> is essential. The Final RAW should also address Rule 1166 requirements for notification and obtain a required soil mitigation plan prior to any soil handling activities. South Coast AQMD Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>3</sup> may also apply if the facility is designated and notified per Rule 1466(b)(1) and if the quantities of contaminated soil exceed 50 cubic yards. South Coast AQMD's Rule 403 – Fugitive Dust,<sup>4</sup> will also apply for any soil movement/disturbance activities.

The proposed remedial actions also involve installation and use of a SVE system. The DRAW states that an SVE pilot study will require a South Coast AQMD 'various locations permit' for one year and, if the

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<sup>1</sup> Revised Feasibility Study and Removal Action Work Plan (DRAW), Mountain Square Cleaners 386 and 384 S. Mountain Avenue, Upland, California, March 31, 2023. Page 1. Accessed at: [https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fcommunity\\_involvement%2F3301014542%2FMountain%20Cleaners\\_Draft%20RAW\\_033123.pdf#page=11](https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fcommunity_involvement%2F3301014542%2FMountain%20Cleaners_Draft%20RAW_033123.pdf#page=11)

<sup>2</sup> South Coast AQMD. Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

<sup>3</sup> South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>

<sup>4</sup> South Coast AQMD's Rule 403 – Fugitive Dust and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information>

system will operate for more than one year, a site-specific South Coast AQMD permit will be required.<sup>5</sup> Furthermore, the DRAW states that if SSD suction pits (and associated components) are needed, they will be designed to operate under a South Coast AQMD Permit as necessary.<sup>6</sup> A South Coast AQMD Rule 201<sup>7</sup>, Permit to Construct, <sup>8</sup> may also apply to the SVE and/or SSD system before construction. Complete and timely permit applications for a Permit to Construct and a Permit to Operate (South Coast AQMD Rule 203<sup>9</sup>) for the SVE system will be required. Questions on air permits should be directed to South Coast AQMD Engineering and Permitting staff at (909) 396-3385.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. 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 Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:EA  
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<sup>5</sup> DRAW. Page 27. Accessed at:

[https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fcommunity\\_involvement%2F3301014542%2FMountain%20Cleaners\\_Draft%20RAW\\_033123.pdf#page=37](https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fcommunity_involvement%2F3301014542%2FMountain%20Cleaners_Draft%20RAW_033123.pdf#page=37)

<sup>6</sup> DRAW. Page 27. Accessed at:

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<sup>7</sup> South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

<sup>8</sup> South Coast AQMD's Rule 201 – Permit to Construct. Access at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

<sup>9</sup> South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.