SENT VIA E-MAIL:

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## **Draft Removal Action Workplan for Taylor Yard Parcel G1 (Site)**

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)'s Draft Removal Action Workplan (RAW) on DTSC's Clean Up Program Community Update in April 2023 for a 3-acre portion of the Taylor Yard Parcel Gl (also known as the Bowtie Parcel) in Los Angeles. The Site was used as a railroad maintenance yard before being split up and sold as parcels. The Nature Conservancy (TNC) is working in partnership with State Parks to redevelop a 3-acre portion of the site, called the Bowtie Demonstration Project. Environmental studies in support of the Bowtie Demonstration Project took place during the last four years. The results of the studies showed lead, combustion-related hydrocarbons, and diesel-range petroleum hydrocarbons at concentrations above residential cleanup standards in the upper two feet of soil at the Site. The Bowtie Parcel is 18 acres of undeveloped land. The Site is located at 2780 W. Casitas Ave., Los Angeles, CA 90039.

If TNC chooses to construct any buildings on the Site in the future, due the presence of hydrocarbons and metal contaminated in the soil based on DTSC's Community Update, the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>1</sup> may apply to the Site. A Rule 1166 compliance plan would also be required and would need to be discussed in the DRAW. South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>2</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. In addition, South Coast AQMD's Rule 403 – Fugitive Dust<sup>3</sup> will also apply for any soil movement/disturbance activities.

<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's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants and its compliance requirement can be found at <a href="https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466">https://www.aqmd.gov/home/rules-compliance/rule-1466</a>
<sup>3</sup> South Coast AQMD's Rule 403 – Fugitive Dust and its compliance requirement can be found at <a href="https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information">https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information</a>

Ms. Jessy Fierro May 17, 2023

If you have any questions or wish to discuss the comments, please contact me at <a href="mailto:swang1@aqmd.gov">swang1@aqmd.gov</a>.

Sincerely,

Sam Wang

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