

<u>SENT VIA E-MAIL:</u> <u>olivia.daou@waterboards.ca.gov</u> Olivia Daou, Project Manager Los Angeles Regional Water Quality Control Board 320 West 4th Street, Suite #200 Los Angeles, California 90013

## <u>Re: Fact Sheet and Notice Of Opportunity To Comment</u> <u>Environmental Investigation and Cleanup</u> Belmont Fibers 1736 Chapin Rd., Montebello, CA 90640 (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. According to the Notice Of Opportunity To Comment Environmental Investigation and Cleanup, the ongoing environmental investigation and proposed Remedial Action Plan (RAP) associated with Belmont Fibers is a cleanup plan prepared by the Los Angeles Water Quality Control Board (LAWQCB) Underground Storage Tank (UST) Program to address soil contaminated with UST primarily such as total petroleum hydrocarbons (TPH) and VOC located at 1736 Chapin Road in Montebello, California.

If LAWQCB chooses to construct any buildings on the Site in the future, due the presence of TPH, VOC and other contaminated in the soil based on the Notice, 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 future plan. 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. Additionally, since the future proposed remedial actions may involve the installation and use of a SVE system, complete and timely permit applications for a Permit to Construct and a Permit to Construct<sup>4</sup> and Rule 203 – Permit to Operate<sup>5</sup>.

April 4, 2024

<sup>&</sup>lt;sup>1</sup> South Coast AQMD. Rule 1166. Accessed at: <u>http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf</u>

 <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 <u>https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466</u>
<sup>3</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/compliance/rule-403-dust-control-information

<sup>&</sup>lt;sup>4</sup> South Coast AQMD Rule 201. Accessed at: <u>http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-</u>201.pdf

<sup>&</sup>lt;sup>5</sup> South Coast AQMD Rule 203. Accessed at: <u>http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf</u>

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 me at <a href="mailto:swang1@aqmd.gov">swang1@aqmd.gov</a> should you have any questions.

Sincerely,

Sam Wang

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