



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (DRAW) for the Lennar Parcel F (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 Public Notice, the Draft Removal Action Workplan (DRAW) is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to remediate soil vapor impacted with volatile organic compounds (VOCs).

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,¹ 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,² 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,³ will also apply for any soil movement/disturbance activities.

The proposed remedial actions also involve installation and use of a SVE system. A South Coast AQMD 'various locations permit' for one year and, if the system will operate for more than one year, a site-specific South Coast AQMD permit will be required.⁴ A South Coast AQMD Rule 201⁵, Permit to Construct, ⁶ may also apply to the SVE system before construction. Complete and timely permit applications for a Permit to Construct and a Permit to Operate (South Coast

¹ 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>.

² 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>

³ 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>

⁴ DRAW. Page 27. Accessed at:

https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fcommunity_involvement%2F3301014542%2FMou%20Cleaners_Draft%20RAW_033123.pdf#page=37

⁵ South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁶ 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>.

AQMD Rule 203⁷) 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 us should you have any questions.

Sincerely,

Sam Wang

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⁷ South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.