

SENT VIA E-MAIL AND USPS:

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Remedial Interim Measures Work Plan for the Former Bodycote Thermal Processing Facility

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document and would like to be included in future public participation activities associated with the cleanup effort at the Former Bodycote Thermal Processing Facility (Site, Facility, or Proposed Project) that is located on the southwest corner of West Oxnard Street and Baird Avenue within the community of Tarzana in the City of Los Angeles. The purpose of the Remedial Interim Measures Work Plan (Plan)¹ is to remove elevated concentrations of chlorinated volatile organic compounds (VOCs) in soil, soil vapor, and groundwater on the 1.29 acre-site. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, South Coast AQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by South Coast AQMD prior to start of any remedial activity. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final Remedial Measures Work Plan, as appropriate.

Disturbing and excavated soils that may contain petroleum hydrocarbons are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil². South Coast AQMD Rule 1166 should be incorporated during the development of the Plan. Furthermore, the Plan should discuss how the cleanup measures will comply with South Coast AQMD Rule $402 - Nuisance^3$ in the event that the VOCs and/or odors are emitted during soil disturbance activities.

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 <u>lsun@aqmd.gov</u> if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D. Program Supervisor, CEQA IGR Planning, Rule Development & Area Sources

LS <u>LAC190611-02</u> Control Number

¹ The Department of Toxic Substances Control (DTSC) has reviewed the interim measures proposed in the Remedial Interim Measures Work Plan (Plan) for the Site and determined that the interim measures are not expected to result in any significant adverse impacts on human health and the environment triggering. As such, the DTSC has prepared a Notice of Exemption (NOE) for the Plan.

² South Coast AQMD. Rule 1166. Accessed at: <u>http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf</u>.

³ South Coast AQMD. Rule 402. Accessed at: <u>http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf</u>.