



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Former Blue Coral McKay Chemical Company 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 DTSC Clean Up Program Community Update in October 2022, the Department of Toxic Substances Control's (DTSC)'s Interim Measures Workplan (IMWP) and Interim Remedial Action Plan (IRAP. DTSC to propose the cleanup of shallow soil contaminated with Metals (Arsenic, Lead, Cadmium, Copper), Volatile Organic Compounds namely Perchloroethylene (PCE) and Trichloroethylene (TCE) and total petroleum hydrocarbons from the property of Former Blue Coral McKay Chemical Company located at 1920 Randolph Street, Huntington Park, California 90001.

However, it is not clear what cleanup activities will be conducted at the site due the presence of PCE, TCE, 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 Soil¹ may apply to the site. A Rule 1166 compliance plan would also be required and would need to be discussed in the IMWP and IRAP. South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants² 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 Dust³ will also apply for any soil movement/disturbance activities. Additionally, since the 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 Operate for the SVE system will be required under South Coast AQMD Rule 201 – Permit to Construct⁴ and Rule 203 – Permit to Operate⁵.

¹ South Coast AQMD. Rule 1166. 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 South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

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

If you have any questions or wish to discuss the comments, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

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Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

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