



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Removal Action Workplan (RAW) for the Integral Partners Funding Site (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, the Draft RAW is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to address soil and soil gas contaminated with petroleum hydrocarbons and Volatile Organic Compounds (VOCs) at a site located on the northeast corner of East Victoria Street and South Central Avenue in the city of Carson, California within the designated AB 617 Wilmington/West Long Beach/Carson community. The purpose of this workplan is to evaluate and propose three distinct removal action alternatives for the site cleanup. The following cleanup alternatives are proposed for the Site: 1) No Action; 2) Soil Vapor Extraction (SVE); and 3) Vapor Intrusion Mitigation System (VIMS).

Due to the presence of VOCs in soil, ensuring compliance with South Coast AQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil,<sup>1</sup> 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,<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. Rule 201, Permit to Construct,<sup>3</sup> may also apply to the VIMS before construction. 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 Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

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<sup>1</sup> 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>.

<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 <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>

<sup>3</sup> 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>.

Sincerely,

*Sam Wang*

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Planning, Rule Development & Implementation

SW:EA

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