



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

October 09, 2025

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## **Draft Removal Action Workplan (DRAW) for the Ellis Avenue Condos (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 address soil contaminated with volatile organic compounds (VOCs) and arsenic.

Because arsenic is among the applicable toxic air contaminants listed in South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>1</sup> it is recommended that the cleanup plan and the final Removal Action Workplan (RAW) include clarifications on whether DTSC, or other agencies listed in Rule 1466, have designated the site for the contaminant and thus subject to the South Coast AQMD Rule 1466 requirements. If so, it is recommended that applicable Rule 1466 requirements be incorporated in the cleanup plan and the final DTSC RAW. More information on Rule 1466 requirements is available on the South Coast AQMD's website<sup>2</sup>. In addition, the Proposed Project would include the digging up of contaminated soil and transporting it to a landfill. Therefore, it is recommended that the applicable requirements of Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>3</sup> be incorporated in the final RAW.

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 Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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ORC250917-04  
Control Number

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<sup>1</sup> South Coast AQMD Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

<sup>2</sup> South Coast AQMD. Compliance. Rule 1466. Accessed at: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.

<sup>3</sup> South Coast AQMD. Rule 1166. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>