



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Community Update: Cleanup at the Former Welch's Uniform Facility (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 notice, the Community Update: Former Welch's Uniform Facility is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to address soil contaminated above the screening levels with the presence of volatile organic compounds (VOCs) to the surface and lead in limited areas, and the installation of a soil vapor extraction (SVE) system to address soil vapor contaminated with VOCs.

Because VOC is among the applicable toxic air contaminants listed in South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹ it should be evaluated to determine applicability to the proposed soil movement activities in the Final Removal Action Workplan (RAW). In addition, the Proposed Project would include the installation of an SVE system, and air permits from the South Coast AQMD may be required. The Final RAW should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,² Rule 203 – Permit to Operate,³ etc. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

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 should you have any questions.

Sincerely,

Sam Wang

Sam Wang
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SW:DN

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¹ South Coast AQMD, Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

² South Coast AQMD, Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

³ South Coast AQMD, Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>