



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (DRAW) for the Newcrow Project (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 1,4-dioxane, hexavalent chromium, and volatile organic compounds (VOCs).

Because VOCs, including 1,4-dioxane are among the applicable air contaminants listed in South Coast AQMD's Rule 1166– Volatile Organic Compound Emissions from Decontamination of Soil¹, it is recommended that the Cleanup Plan and the final Removal Action Workplan (RAW) clarify whether the planned activities are subject to South Coast AQMD Rule 1166. If Rule 1166 is applicable, the Cleanup Plan and final RAW should incorporate the applicable requirements, including preparation and implementation of a VOC mitigation plan, as required.

In addition, because hexavalent chromium is among the toxic air contaminants regulated under South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,² it is also recommended that the Cleanup Plan and final RAW clarify whether DTSC, or another agency identified in Rule 1466, has designated the site for this contaminant and whether the site is subject to Rule 1466 requirements. If applicable, the requirements of Rule 1466 should be also incorporated into the Cleanup Plan and final RAW.

Lastly, any soil-disturbing activities should comply with South Coast AQMD Rule 403 – Fugitive Dust to minimize fugitive dust emissions.³

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 Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

¹ [Rule 1166. Volatile Organic Compound Emissions from Decontamination of Soil](#)

² [Rule 1466. Control of Particulate Emissions From Soils With Toxic Air Contaminants](#)

³ [Rule 403. Fugitive Dust](#)

Mr. Don Indermill, DTSC Project Manager

June 26, 2026

Sincerely,

Sam Wang

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