



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Interim Remedial Action Plan (IRAP) for the Coca Cola Los Angeles Interim Remedial Action Plan (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 Remedial Action Plan (IRAP) is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to address soil contaminated with VOCs primarily such as tetrachloroethene (PCE) and trichloroethylene (TCE).

Because VOCs such as PCE and TCE are among the applicable toxic air contaminants listed in South Coast AQMD Rule 1401 – New Source Review of Toxic Air Contaminants¹, it is recommended that the cleanup plan and the final Remedial Action Plan (RAP) include clarifications on if DTSC, or other agencies listed in Rule 1401, has designated the site for the contaminant and thus subject to the South Coast AQMD Rule 1401 requirements. If so, it is recommended that applicable Rule 1401 requirements be incorporated in the cleanup plan and the final DTSC RAP. More information on Rule 1401 requirements is available on the South Coast AQMD’s website.

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 and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.⁴ 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

¹ South Coast AQMD Rule 1401. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.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>

⁴ South Coast AQMD, Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:SG

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