South Coast
Air Quality Management District
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**Draft Remedial Action Plan (RAP) for the**
**15825 Roxford Street 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 Remedial Action Plan (RAP) is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to address soil contaminated with Volatile Organic Compounds (VOCs), including tetrachloroethene, trichloroethene, benzene, and petroleum hydrocarbons.

**In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses, and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

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 is recommended that the cleanup plan and the final RAP include clarifications on whether DTSC, or other agencies listed in Rule 1166, has designated the site for the contaminant and thus subject to the South Coast AQMD 1166 requirements. If so, it is recommended that applicable Rule 1166 requirements be incorporated in the cleanup plan and the final DTSC RAP. More information on Rule 1166 requirements is available on the South Coast AQMD's website.

In addition, the Proposed Project would include the installation of a vapor intrusion mitigation system (VIMS); thus, air permits from the South Coast AQMD may be required. The Final RAP 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.

[1] South Coast AQMD Rule 1166. Accessed 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

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 or me at swang1@aqmd.gov should you have any questions.

Sincerely,

*Sam Wang*

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