



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (RAW) for The Quincy

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. In the Community Update for the Draft RAW, the Department of Toxic Substances Control (DTSC) is proposing three options to clean up soil contaminated with lead on a 0.37-acre site (Site) that is located near the southwest corner of West Pico Boulevard and Dewey Avenue in the City of Los Angeles. Cleanup option 1 is no action. Cleanup option 2 would involve covering the Site with a barrier and implementing restrictions for future use and management. Cleanup option 3 would involve excavation, removal, and disposal of 153 cubic yards of contaminated soil and an existing 550-gallon underground tank. A building currently occupies the Site.

If cleanup option 3 is approved for implementation, DTSC should ensure that tank removal and soil movement activities comply with requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil¹. It is also recommended that DTSC evaluate and discuss in the Final RAW that the cleanup actions under option 3 comply with South Coast AQMD Regulation IV-Prohibitions², such as Rule 401 – Visible Emissions³, Rule 402 – Nuisance⁴, and Rule 403 – Fugitive Dust⁵. In addition, if renovation or demolition of the existing building would be required, South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities⁶ and U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos⁷ would apply and should be discussed in the Final RAW. Because cleanup option 3, if approved, would involve earth-moving activities of contaminated soil greater than 50 cubic yards, and lead is among the applicable toxic air contaminants listed in Table I of South Coast AQMD Rule 1466 – Control of Particulate

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

² South Coast AQMD. Regulation IV. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-iv>.

³ South Coast AQMD. Rule 401. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

⁴ South Coast AQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

⁵ South Coast AQMD. Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁶ South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

⁷ 40 CFR, Chapter 61, Subpart M. Accessed at: http://www.swcleanair.org/docs/misc/NES_Asbestos.pdf.

Emissions from Soils with Toxic Air Contaminants⁸, it is recommended that the Final RAW include clarifications on if DTSC or other agencies listed in Rule 1466(b) have designated or plan to designate the Site for the contaminant listed as a concern. If the Site is so designated and notified per 1466(b), and thus subject to the South Coast AQMD 1466 requirements, it is recommended that applicable Rule 1466 requirements be incorporated in the Final RAW. More information on Rule 1466 requirements is available on the South Coast AQMD's website⁹.

If you have any questions or wish to discuss the comments, please feel free to contact Steve Tsumura, Air Quality Specialist, at stsumura@aqmd.gov. Questions on South Coast AQMD Rule 1466 can be directed to Rule1466@aqmd.gov.

Sincerely,

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Planning, Rule Development and Area Sources

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⁸ South Coast AQMD Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

⁹ South Coast AQMD. Compliance. Rule 1466. Accessed at: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.