



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 SCE- Valencia Cleanup 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, the Draft RAW is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to propose excavation and disposal of approximately 232 cubic yards of soil with elevated levels of arsenic, polychlorinated biphenyls (PCBs) and naphthalene from the site of a former electrical substation located on a 0.27-acre parcel at the southwest corner of 40th Street and Genevieve Street in San Bernardino, California.

The Draft RAW acknowledges South Coast AQMD Rule 1466, *Control of Particulate Emissions from Soils with Toxic Air Contaminants*.¹ However, the extent of volatile organic compounds (VOCs) was not fully defined in previous investigations, and the Draft RAW did not discuss the applicability of South Coast AQMD Rule 1166, *Volatile Organic Compound Emissions from Decontamination of Soil*.² Furthermore, since the Proposed Project involves excavating soil that may contain VOC materials, a Rule 1166 Mitigation Excavation Compliance Plan must be approved prior to excavation or handling. South Coast AQMD's Rule 403, *Fugitive Dust*,³ will also apply to any soil movement or disturbance activities.

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

Sincerely,

Sam Wang

Sam Wang
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¹ South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>

² South Coast AQMD. Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

³ South Coast AQMD's Rule 403 – Fugitive Dust and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information>