



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 Canyon Crest Cleaners 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 address soil and soil vapor contaminated with volatile organic compounds (VOCs) relating to historically used tetrachloroethylene (PCE) as a dry-cleaning solvent at Canyon Crest Cleaners site located at 2380 N Tustin Avenue, Santa Ana, California. The following cleanup alternatives are proposed for the Site: 1) No Action; 2) Soil Vapor Extraction (SVE), Land Use Covenant (LUC) and Soil Management Plan (SMP), and 3) Thermal Conducting Heating (TCH), LUC and SMP.¹ After evaluating the three alternatives, DTSC selected alternative #2 for the proposed remedy for the site.

The Draft RAW acknowledges South Coast AQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil,² but concludes the Proposed Project would not be subject to the requirements. However, due to the presence of VOCs in soil vapor, the Proposed Project must comply with Rule 1166 and the approval of a Rule 1166 Excavation Compliance Plan is required before excavation or handling. Furthermore, the Proposed Project may also be subject to South Coast AQMD Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants.³ If the earth-moving activities of soil with applicable toxic air contaminant(s) of exceeds 50 cubic yards, the excavation and notification requirements in Rule 1466 will apply. South Coast AQMD's Rule 403 – Fugitive Dust,⁴ will also apply for any soil movement or disturbance activities.

The DRAW states that the proposed remedial actions also involve design, installation and use of an SVE system which will require a South Coast AQMD 'various locations permit', if it is for one year, or a site-specific South Coast AQMD permit, if the system will operate for more than one year. Therefore, South

¹ Cleanup Program Community Updates, September 2024. Accessed at:

[https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fdeliverable_documents%2F8527210831%2FCanyon%20Crest%20Cleaners-%20Community%20Update%20\(FINAL\)-%20English.pdf](https://www.envirostor.dtsc.ca.gov/getfile?filename=/public%2Fdeliverable_documents%2F8527210831%2FCanyon%20Crest%20Cleaners-%20Community%20Update%20(FINAL)-%20English.pdf)

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 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>

⁴ 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>

Coast AQMD Rule 201⁵, Permit to Construct, ⁶ will apply to the SVE system before Proposed Project construction. Complete and timely permit applications for a Permit to Construct and a Permit to Operate (South Coast AQMD Rule 203⁷) for the SVE system will be required. Questions on air permits should be directed to South Coast AQMD Engineering and Permitting staff at (909) 396-3385.

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,

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Control Number

⁵ South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁶ South Coast AQMD's Rule 201 – Permit to Construct. Access at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁷ South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.