



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Revised Draft Removal Action Workplan for Former YRC Wilmington

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document and would like to be included in future public participation activities associated with the cleanup effort at the Former YRC Wilmington site (Site, Facility, or Project) that is located at 1531 Blinn Avenue, Wilmington, California. The purpose of the Revised Draft Removal Action Workplan (DRAW)¹ is to clean up residual petroleum-related chemicals at the Site using the existing land fill gas vapor intrusion protection system. Additionally, a land use covenant will be established to prohibit any homes, schools from being built on the Site. Finally, the Revised DRAW will restrict groundwater use. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final RAW, as appropriate.

1. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of any remedial activity.
2. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil². SCAQMD Rule 1166 should be incorporated during the development of the Final RAW, where appropriate. Furthermore, the Final RAW should also discuss how the cleanup activities will comply with SCAQMD Rule 402 – Nuisance³, in the event that the VOCs and/or odors are emitted during soil disturbance activities.

SCAQMD 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 lsun@aqmd.gov or Daniel Garcia, Program Supervisor, at dgarcia@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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¹ The DTSC has determined that the impacts associated with the protective measures would be less significant.

² SCAQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

³ SCAQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>