



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL:

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[Anantaramam.Peddada@dtsc.ca.gov](mailto:Anantaramam.Peddada@dtsc.ca.gov)

Anantaramam Peddada, Project Manager  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, California 90630

## **Draft Site Investigation and Corrective Action for the Former Endeveco Corporation**

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 Site Investigation and Corrective Action, the Department of Toxic Substances Control (DTSC) is developing cleanup actions to remediate soil contaminated with volatile organic compounds and a land use covenant to prohibit future sensitive land uses on a 15.3-acre site (site) that is located at 30700 Rancho Viejo Road near the southeast corner of Rancho Viejo Road and Malaspina Road in the City of San Juan Capistrano.

Due to the presence of volatile organic compounds in soil, the DTSC should ensure that excavation and soil movement operations comply with requirements of South Coast AQMD Rule 1166 – Volatile Organize Compound Emissions from Decontamination of Soil<sup>1</sup>. The Final Site Investigation and Corrective Action should also address Rule 1166 requirements for notification and to obtain a required soil mitigation plan prior to soil handling activities. It is also recommended that the DTSC evaluate and discuss in the Final Site Investigation and Corrective Action that the cleanup actions comply with South Coast AQMD Regulation IV-Prohibitions<sup>2</sup>, such as Rule 401 – Visible Emissions<sup>3</sup>, Rule 402 – Nuisance<sup>4</sup>, and Rule 403 – Fugitive Dust<sup>5</sup>, and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities<sup>6</sup> and U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos<sup>7</sup>. Furthermore, the DTSC should clarify in the Final Site Investigation and Corrective Action whether the DTSC, or other agencies listed in Rule 1466(b)(1), have designated and notified, or plan to designate and notify, the site for the applicable toxic air contaminant(s) identified as contaminant(s) of concern at the site, pursuant to South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>8</sup>.

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

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

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

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

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

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

<sup>7</sup> 40 CFR, Chapter 61, Subpart M. Accessed at: [http://www.swcleanair.org/docs/misc/NES\\_Asbestos.pdf](http://www.swcleanair.org/docs/misc/NES_Asbestos.pdf).

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

Anantaramam Peddada

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If you have any questions or wish to discuss the comments, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov), Mr. John Anderson, Air Quality Analysis and Compliance Supervisor, at [janderson@aqmd.gov](mailto:janderson@aqmd.gov), or Ms. Amanda Sanders, Air Quality Analysis and Compliance Supervisor, at [asanders@aqmd.gov](mailto:asanders@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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