



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (RAW) for 1910-1918 South Los Angeles Street

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 developing cleanup actions to excavate, remove, and dispose contaminated soil with volatile organic compounds, lead, tetrachloroethylene, and trichloroethylene on a 0.14-acre site (site) that is located on the southeast corner of Los Angeles Street and Washington Boulevard in the community of Southeast Los Angeles within the City of Los Angeles. The Community Update for the Draft RAW also states that air monitoring will be conducted in accordance with South Coast AQMD Rule 1166. Lead is among the applicable toxic air contaminants listed in South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants¹. It is recommended that the Final RAW includes clarification on whether the DTSC, or other agencies listed in Rule 1466(b), have designated, or plan to designate, the site for the contaminant listed as a concern subject to Rule 1466. If the site is so designated and thus subject to South Coast AQMD Rule 1466 requirements, it is recommended that applicable Rule 1466 requirements be incorporated into the Final RAW. Additionally, the Final RAW should ensure excavation and soil movement operations will comply with South Coast AQMD Regulation IV-Prohibitions², such as Rule 401 – Visible Emissions³, Rule 402 – Nuisance⁴, and Rule 403 – Fugitive Dust⁵. Demolition of existing buildings will also need comply with 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.

If you have any questions or wish to discuss the comments, please contact me at lsun@aqmd.gov or Mr. John Anderson, Air Quality Analysis and Compliance Supervisor, at janderson@aqmd.gov.

Sincerely,

Lijin Sun

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¹ South Coast AQMD. Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.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.