



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Feasibility Study and Remedial Action Plan (RAP) for the Former Soco-Lynch Facility

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. Based on the Community Update, the Department of Toxic Substances Control (DTSC) is developing cleanup actions to remediate soil, soil vapor, and groundwater contaminated with volatile organic compounds (VOCs) on a 3.3-acre site (Site) that is located at 3270 East Washington Boulevard on the northeast corner of East Washington Boulevard and South Downey Road in the City of Vernon within the designated AB 617 Southeast Los Angeles community. The cleanup actions would involve the installation of soil vapor extraction and vapor intrusion mitigation systems.

The installation and operation of soil vapor extraction and vapor intrusion mitigation systems are subject to requirements of South Coast AQMD Rule 201 – Permit to Construct¹ and Rule 203 – Permit to Operate² and should be discussed in the Final Feasibility Study and RAP. Due to the presence of VOCs in soil, if cleanup actions would involve exaction and soil movement operations, requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil³ will apply and should be discussed in the Final Feasibility Study and RAP. The Final Feasibility Study and RAP should also address Rule 1166 requirements for notification and to obtain a required soil mitigation plan prior to soil handling activities. If the cleanup actions would involve earth-moving activities of contaminated soil greater than 50 cubic yards, and if soil is contaminated with any of the toxic air contaminants listed in Table I of South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, it is recommended that the Final Feasibility Study and RAP include clarifications on if DTSC or other agencies listed in Rule 1466(b) have designated or plan to designate the Site for the contaminant listed as a concern. If the Site is so designated and notified per Rule 1466(b), and thus subject to the South Coast AQMD Rule 1466 requirements, it is recommended that applicable Rule 1466 requirements be incorporated in the Final Feasibility Study and RAP. More information on Rule 1466 requirements is available on the South Coast AQMD's website⁴. Requirements of South Coast AQMD Rule 403 – Fugitive Dust⁵ also apply for soil movement operations.

¹ South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

² South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

³ South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

⁴ South Coast AQMD. Compliance. Rule 1466. Accessed at: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.

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

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If you have any questions or wish to discuss the comments, please contact me at lsun@aqmd.gov.
Questions on South Coast AQMD Rule 1466 can be directed to Rule1466@aqmd.gov.

Sincerely,

Lijin Sun

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Planning, Rule Development & Area Sources

LS:JA

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