



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (RAW) for SBD Real Estate Four, LLC

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 excavate, remove, and dispose the top 24 inches of soil contaminated with volatile organic compounds (VOCs), and install a soil vapor barrier on a 0.28-acre site (Site) that is located at 1341 West Gardena Boulevard near the northeast corner of West Gardena Boulevard and Normandie Avenue in the City of Gardena, California.

Due to the presence of VOCs in soil, requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil¹ will apply and should be discussed in the Final RAW. If the proposed removal 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 RAW 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 RAW. More information on Rule 1466 requirements is available on the South Coast AQMD's website². Soil movement operations would also be required to comply with South Coast AQMD Rule 403 – Fugitive Dust³. Furthermore, asphalt has been known to contain more than one percent of asbestos. If any asphalt will be disturbed or removed, the asphalt must be surveyed per South Coast AQMD Rule 1403 requirements⁴, and if the asphalt contains more than one percent of asbestos, it must be abated per Rule 1403 requirements.

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

² South Coast AQMD. Compliance. Rule 1466. Accessed at: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.

³ South Coast AQMD. Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁴ South Coast AQMD. Rule 1403. Accessed at: www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.