



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 (FS-RAP) for Alumin-Art Plating Company

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 remove volatile organic compounds (VOCs) in soil and soil vapor on a one-acre site (Site) that is located at 803 West State Street near the southwest corner of West State Street and South San Antonio Avenue in the City of Ontario, California. Based on the Draft FS-RAP, the proposed cleanup actions would include installation of additional extraction wells and update the existing soil vapor extraction (SVE) system that is operated per the conditions of South Coast AQMD Permit No. G65238 (since May 2021) or previous South Coast AQMD Various Locations Permit No. F86543 (May 2020 to May 2021)¹. A new permit to construct and permit to operate from South Coast AQMD for the upgraded SVE system may be required². Renovation and demolition of buildings are not identified as a remedial action in the Draft FS-RAP.

Due to the presence of VOCs in soil, requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil³ will apply and should be discussed in the Final FS-RAP. If the proposed 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 FS-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 FS-RAP. More information on Rule 1466 requirements is available on the South Coast AQMD's website⁴. Soil movement operations would also be required to comply with South Coast AQMD Rule 403 – Fugitive Dust⁵. Furthermore, asphalt has been known to contain more

¹ Draft FS-RAP. Page 12.

² Draft FS-RAP. Page 28.

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>.

than one percent of asbestos. If any asphalt will be disturbed or removed, the asphalt must be surveyed per South Coast AQMD Rule 1403 requirements⁶, 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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Planning, Rule Development & Area Sources

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