



South Coast Air Quality Management District

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Review of the Draft Removal Action Workplan: Groundwater Remediation (GWRAW) for the Avalon Triangle Site (101 N. Broad Ave., Wilmington, CA)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised or final Removal Action Workplan: Groundwater Remediation (GWRAW), as appropriate.

Based on a review of the Draft GWRAW, the SCAQMD staff is concerned about the potential air quality impacts from the construction air pollutant emissions associated with the soil excavation/disturbance, and off-site transport activities required for the proposed project. Although the construction air pollutant emissions from the project are estimated to be below the applicable thresholds, staff recommends the following additional measures to further reduce air quality impacts from construction activities:

- Require the use of 2010 and newer diesel haul trucks (e.g., soil import/export trucks).
- Require construction equipment to be outfitted with BACT devices certified by CARB.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

Further, in addition to compliance with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil the Final GWRW should discuss how the project will comply with SCAQMD Rule 402 – Nuisance if volatile organic compounds and/or odors are emitted during soil excavation/disturbance activities. Also, given that previous soil investigations determined that the project site contained Lead contaminated soil the SCAQMD staff is concerned about potential fugitive lead dust emissions generated by the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency develop measures to prevent lead emissions and comply with SCAQMD Rule 1420 – Emissions Standard for Lead.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Tim Kobata, Air Quality Specialist at (909) 396-2862, if you have any questions regarding these comments. We look forward to reviewing and providing comment for the Final GWRW associated with this project.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

EE:TK

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