



South Coast
Air Quality Management District
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Sent via USPS and E-Mail
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Fremont High School Redevelopment Project Areas 3 and 5 – Draft Remedial Action Workplan (RAW)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document and would like to be included in future public participation activities associated with the cleanup effort. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance of the project start to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of the operation. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised or final Remedial Action Workplan (RAW), as appropriate.

As stated in the Draft RAW, DTSC will remove and properly dispose of soils contaminated with arsenic (pesticides and herbicides), lead (lead based paints), polycyclic aromatic hydrocarbons (PAHs) and dioxins/furans (historical incinerator use) at the project site in order to reduce the potential threat to human health and the environment. Approximately 2,429 cubic yards of potentially impacted soil will be excavated, segregated, and sampled. Based on analytical results, soil that exceeds the Site cleanup criteria will be transported offsite to a permitted disposal facility.

The SCAQMD staff would like to remind DTSC that disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 should be incorporated during the development of the Final RAW. Further, the Final RAW should discuss how the project will comply with SCAQMD Rule 402 – Nuisance and SCAQMD Rule 403 – Fugitive Dust and Rule.

The SCAQMD staff is available to work with the DTSC to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me Jack Cheng, Air Quality Specialist, at (909) 396-2448.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JW:JC
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