



South Coast
Air Quality Management District
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February 2, 2016

Sent via USPS and E-Mail
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Stephen Baxter, Project Manager
Department of Toxic Substances Control
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Proposed Interim Measure Work Plan
Revised Pond 1 Closure Plan – Phibro-Tech, Inc. Santa Fe Springs, CA 90670

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 Proposed Interim Measure Work Plan.

As stated in the Proposed Interim Measure Workplan, the lead agency will remove and properly dispose of soils contaminated with hexavalent chromium at the project site in order to reduce the potential threat to human health and the environment. Approximately 800 cubic yards of potentially impacted soil and demolition debris 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. Additionally, the PTI should also discuss how the project will comply with SCAQMD Rule 402 – Nuisance and SCAQMD Rule 403 – Fugitive Dust and Rule.

Furthermore, should the lead agency encounter asbestos, storage tank/pipe degassing, or VOC contaminated soil during demolition and excavation, the lead agency should ensure compliance with SCAQMD Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities), SCAQMD Rule 1149 (Storage Tank and Pipeline Cleaning and Degassing), and SCAQMD Rule 1166 (Volatile Organic Compound Emissions From Decontamination of Soil). It may be appropriate to perform air monitoring for dust, lead, hexavalent chrome or other contaminants.

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
LAC151215-02
Control Number