



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Removal Action Workplan (RAW) for Industrial Polychemical Services Corporation (IPS)

The South Coast Air Quality Management District (SCAQMD) staff 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 at the IPS site. The purpose of the Draft RAW¹ is to remediate and cleanup elevated levels of volatile organic compounds (VOCs) in subsurface soil, soil vapor, and groundwater (Project). 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 operation. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final RAW, as appropriate.

As stated in the Draft RAW, investigation performed at the site revealed elevated levels of VOCs impacting soil, soil vapor, and groundwater. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil². SCAQMD Rule 1166 should be incorporated during the development of the Final RAW. Furthermore, the Final RAW should also discuss how the project will comply with SCAQMD Rule 402 – Nuisance³, if volatile organic compounds and/or odors are emitted during soil disturbance activities.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC180301-12
Control Number

¹ The DTSC has reviewed the RAW and determined that the RAW is exempt from CEQA, not expected to result in any significant adverse impacts to the environment. As such, a Notice of Exemption (NOE) for the RAW has been issued.

² SCAQMD Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

³ SCAQMD Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.