



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Statement of Basis for Sunland Chemical and Research Corporation

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. The purpose of the Draft Statement of Basis is to highlight key information relied upon by the Department of Toxic Substances Control (DTSC) in proposing remediation of soil and groundwater contaminated with volatile organic compounds (VOCs), benzene, toluene, ethylbenzene, and xylene, develop a land use covenant to restrict future use of a 1.37-acre site (Site) to commercial or industrial use, and require five years of inspection. The Site is located at 5447 West San Fernando Road near the southwest corner of West San Fernando Road and Doran Street in the City of Los Angeles. Due to the presence of VOCs in soil, remedial actions should comply with requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil¹ for excavating, grading, handling, and treating VOCs-contaminated soils. The Final Statement of Basis should address Rule 1166 requirements. In addition, since other contaminants in addition to VOCs are present in soil, it is recommended that the DTSC review the requirements of South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants² to determine if remedial actions are subject to the requirements of Rule 1466. If Rule 1466 requirements apply, the Final Statement of Basis should include them.

If you have any questions or wish to discuss the comments, please contact Steve Tsumura, Air Quality Specialist, at stsumura@aqmd.gov or Mr. John Anderson, Air Quality Analysis and Compliance Supervisor, at janderson@aqmd.gov.

Sincerely,

Lijin Sun

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¹ South Coast AQMD Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

² South Coast AQMD Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.