



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL:

May 13, 2021

[Johnson.Abraham@dtsc.ca.gov](mailto:Johnson.Abraham@dtsc.ca.gov)

Johnson Abraham, Project Manager  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, California 90630

## **Draft Removal Action Workplan (RAW) for Former Brownies Cleaners**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. In the Community Update for the Draft RAW, the Department of Toxic Substances Control (DTSC) is developing cleanup actions to excavate soil contaminated with volatile organic compounds (VOCs) on a 0.7-acre site (site) that is located on the northeast corner of Westminster Boulevard and La Pat Place in the City of Westminster. The site was developed in the 1960s with a residence and two commercial buildings. The Community Update for the Draft RAW also states that a soil vapor extraction (SVE) system will be installed to remediate VOCs in soil vapor.

Due to the presence of VOCs in soil, DTSC should ensure that excavation and soil movement operations comply with requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>1</sup>. The Final RAW should also address Rule 1166 requirements for notification and to obtain a required soil mitigation plan prior to soil handling activities. It is also recommended that DTSC evaluate and discuss in the Final RAW that the cleanup actions comply with South Coast AQMD Regulation IV-Prohibitions<sup>2</sup>, such as Rule 401 – Visible Emissions<sup>3</sup>, Rule 402 – Nuisance<sup>4</sup>, Rule 403 – Fugitive Dust<sup>5</sup>. South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities<sup>6</sup> and U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos<sup>7</sup> would apply, if demolition of existing buildings would be required. Moreover, because the cleanup actions will involve, among others, installation and operation of new equipment, complete and timely permit/plan applications to South Coast AQMD as follows will be required.

---

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

<sup>2</sup> South Coast AQMD. Regulation IV. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-iv>.

<sup>3</sup> South Coast AQMD. Rule 401. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

<sup>4</sup> South Coast AQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

<sup>5</sup> South Coast AQMD. Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>6</sup> South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

<sup>7</sup> 40 CFR, Chapter 61, Subpart M. Accessed at: [http://www.swcleanair.org/docs/misc/NES\\_Asbestos.pdf](http://www.swcleanair.org/docs/misc/NES_Asbestos.pdf).

- Application for a Permit to Construct and a Permit to Operate for the proposed new SVE system (which includes air injection wells). It is recommended that DTSC review and discuss the requirements of South Coast AQMD Rule 201 – Permit to Construct<sup>8</sup> and Rule 203 – Permit to Operate<sup>9</sup> in the Final RAW.
- Application for a South Coast AQMD Rule 1166 Excavation Compliance Plan(s) for the proposed soil excavation, grading, and handling activities.

If you have any questions or wish to discuss the comments, please feel free to contact Steve Tsumura, Air Quality Specialist, at [stsumura@aqmd.gov](mailto:stsumura@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development and Area Sources

LS/JA:ST  
ORC210429-02  
Control Number

---

<sup>8</sup> South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

<sup>9</sup> South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.