



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Soil Management Plan (SMP) for the Former Renu Plating Company, Inc. (Proposed Nevin Park Site) (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the Community Update Public Notice, the SMP is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to assist in the soil movement and includes the necessary sampling protocols and procedures to ensure that the SMP fieldwork activities, prior to the construction of the park, are aligned with applicable regulations. The site was historically occupied by Renu Plating Company, where electroplating of metal products took place. Although, in 2009 a Removal Action Workplan (RAW) was performed by DTSC to remediate the impacted soil, it is important to note that Electroplating operations can result in release of Air Toxins, Heavy Metals, and Volatile Organic Compounds (VOC).

Due to the presence of VOCs in soil, it is essential to ensure the compliance with the 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 any soil handling activities. Additionally, according to the SMP, the city intends to remove the top two feet of soil and replace it with uncontaminated soil. Consequently, the Final RAW should also address South Coast AQMD's Rule 403 – Fugitive Dust<sup>2</sup> for any soil movement/disturbance activities. South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>3</sup> may also apply if the facility is designated and notified per Rule 1466(b)(1), and if the quantities of contaminated soil exceed 50 cubic yards.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. South Coast AQMD staff is available to work with the Lead Agency to address any

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<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's Rule 403 – Fugitive Dust and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information>

<sup>3</sup> South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>

air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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Planning, Rule Development & Implementation

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