



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Removal Action Workplan for the Los Angeles Department of Water and Power Lincoln Heights Service Center (Site)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. Based on the Department of Toxic Substances Control's (DTSC)'s Draft Removal Action Workplan (RAW) on DTSC's Clean Up Program Community Update in December 2022, Los Angeles Department of Water and Power (LADWP) and DTSC will enter into a Land Use Covenant (LUC) to restrict future use of the property for residences, schools or hospitals because the Site has been identified contaminants that were detected above screening levels for arsenic, benzene, tetrachloroethene (PCE) and trichloroethene (TCE). LUC will require the construction plans to be provided to DTSC for review and the plans must ensure that any necessary measures are incorporated into building design to address potential soil vapor intrusion if LADWP chooses to construct any buildings on the Site in the future. The Site has a size of 3.4-acre and is located at 301 West Avenue 26, Los Angeles, California.

If LADWP chooses to construct any buildings on the Site in the future, due the presence of PCE, TCE, and metal contaminated in the soil based on DTSC's Community Update, the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>1</sup> may apply to the Site. A Rule 1166 compliance plan would also be required and would need to be discussed in the DRAW and LUC. South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>2</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. In addition, South Coast AQMD's Rule 403 – Fugitive Dust<sup>3</sup> will also apply for any soil movement/disturbance activities. Additionally, since the future proposed remedial actions may involve the installation and use of a SVE system, complete and timely permit applications for a Permit to Construct and a Permit to Operate for the SVE system

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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 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>

<sup>3</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>

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will be required under South Coast AQMD Rule 201 – Permit to Construct<sup>4</sup> and Rule 203 – Permit to Operate<sup>5</sup>.

If you have any questions or wish to discuss the comments, please contact me at [swang1@aqmd.gov](mailto:swang1@aqmd.gov).

Sincerely,

*Sam Wang*

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<sup>4</sup> South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>5</sup> South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>