



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Response Plan for the Slauson & Wall Cleanup Project (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 Draft Response Plan is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC). The purpose of this plan is to evaluate and propose three distinct remedial alternatives for the site cleanup. These alternatives include: 1) Soil excavation and off-site disposal. 2) Ground level separation by building an underground parking garage and installation of vapor barriers, and Passive Venting Soil Vapor Extraction (SVE) system to clean up soil contaminants, such as trichloroethylene (TCE) and tetrachloroethylene (PCE) from metal degreasing and dry cleaning. 3) Groundwater monitoring and reducing chemicals using bioremediation and chemical oxidation and extracting impacted groundwater. The project is located near the southeast corner of East Slauson Avenue and Wall Street within the designated AB 617 South Los Angeles community.

The proposed remedial actions would 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 will be required under South Coast AQMD Rule 201 – Permit to Construct¹ and Rule 203 – Permit to Operate². In addition, South Coast AQMD’s Rule 403 – Fugitive Dust³ will also apply for any soil movement/disturbance activities. Volatile organic compounds are regulated under South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil⁴ and should be evaluated to determine applicability to the proposed soil movement activities. South Coast AQMD’s Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants⁵ 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.

¹ South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

² South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

³ 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>

⁴ South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

⁵ 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>

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

Sincerely,

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