



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (DRAW) for Boysen Park Site

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 Removal Action Workplan (DRAW) is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to address soil contaminated with metals primarily such as arsenic, copper, lead, and mercury at the Site that was located within the limits of a City of Anaheim landfill which was operated from at least 1906 until approximately the mid-1930s. The landfill was redeveloped in 1958 as the present-day Boysen Park. The Boysen Park Site is an approximate 24.6-acre, irregularly shaped property and is bordered by South State College Boulevard to the east, Vermont Avenue to the north, Theodore Roosevelt Elementary School to the west and residences to the south.

Because arsenic, lead, and mercury are among the applicable toxic air contaminants listed in South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants¹, it is recommended that the cleanup plan and the final Removal Action Workplan (RAW) include clarifications on if DTSC, or other agencies listed in Rule 1466(b), has designated the site for the contaminant and thus subject to the South Coast AQMD 1466 requirements. If so, it is recommended that applicable Rule 1466 requirements be incorporated in the cleanup plan and the final DTSC RAW. More information on Rule 1466 requirements is available on the South Coast AQMD's website². Additionally, the cleanup activity such as excavation or soil movement and off-site disposal of contaminated soil are capable of generating fugitive dust, requirements of South Coast AQMD Rule 403 – Fugitive Dust³ will apply and should be discussed in the cleanup plan and the final DTSC RAW.

¹ South Coast AQMD Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

² South Coast AQMD. Compliance. Rule 1466. Accessed at: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.

³ South Coast AQMD Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

Mr. Johnson Abraham

March 13, 2023

If you have any questions or wish to discuss the comments, please contact me at swang1@aqmd.gov. Questions on South Coast AQMD Rule 1466 can be directed to Rule1466@aqmd.gov.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

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