



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (DRAW) for First Christian Church 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 lead at the 1.6-acre Site that was located within the limits of a City of Alhambra. The Alhambra Unified School District (AUSD) intends to demolish existing structures and develop the property as an outdoor athletic area. The Site is bounded by South 5th Street on the west, Alhambra High School (School) on the north, South 4th Street on the east, and Commonwealth Avenue on the south. The Site was vacant in 1907. Construction of current structures including an assembly room, offices, chapel, classrooms, courtyard, and parking areas were completed between 1928 to 1972. The Site has been unchanged since 1972.

Because lead is 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 can generate 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

May 17, 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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Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

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