



# South Coast Air Quality Management District

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## **Saugus Industrial Center, Former Keysor-Century Corporation Facility** **Draft Remedial Action Plan (DRAP)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document and would like to be included in future public participation activities associated with the cleanup effort. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance of the project start to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of operation. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised or final Removal Action Plan, as appropriate.

As stated in the DRAP, Saugus Industrial Center, Former Keysor-Century Corporation Facility, in cooperation with DTSC, will be utilizing Soil Vapor Extractors (SVE) and Enhanced In-Situ Bioremediation (EISB) to remediate vadose soil and groundwater respectively (Alternative 6). Past remedial investigations indicated that soil and groundwater are contaminated with (1,2-DCA), cis1,2-DCE, PCE, toluene, TCE, and VOCs. The SCAQMD staff would like to remind the DTSC that disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 should be incorporated during the development of the Final RAP. Furthermore, the Final RAP should also discuss how the project will comply with SCAQMD Rule 402 – Nuisance, if volatile organic compounds and/or odors are emitted during soil disturbance activities.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

*Jillian Baker*

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JB:JC

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