



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Interim Removal Action Workplan (RAW) for Former Palace Plating Site, Los Angeles

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 at the Former Palace Plating Site (Site or Project). The purpose of the Draft Interim RAW¹ is to remove the volatile organic compounds (VOCs) in soils at the 0.3-acre Site that is currently vacant. 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 Final RAW, as appropriate.

As stated in the Draft Interim RAW, the investigations performed at the Site revealed presence of VOCs, and that the VOCs had moved from the Site to part of the 28th Street Elementary School that is located across the street from the Site. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil². SCAQMD Rule 1166 should be incorporated during the development of the Final RAW. Furthermore, the Final RAW should also discuss how the Project will comply with SCAQMD Rule 402 – Nuisance³, in the event that the VOCs and/or odors are emitted during soil disturbance activities.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC180417-06

Control Number

¹ The DTSC has reviewed the environmental activities proposed for the Site and determined that the proposed Draft Interim RAW is exempt from CEQA. As such, a Notice of Exemption (NOE) for the Draft Interim RAW was prepared.

² SCAQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

³ SCAQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.