



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Proposed Draft Remedial Action Plan (RAP) for the El Monte Gateway Parcel 3 Site**

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 project at the 5.510-acre El Monte Gateway Parcel 3 Site ("Site"). 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 the SCAQMD prior to start of operation. The following comments are intended to provide guidance to the Department of Toxic Substances Control (DTSC) for the development of the RAP and should be incorporated into the revised or Final RAP, as appropriate.

### Background

The DTSC is developing a draft RAP for the Site. The City of El Monte plans to develop this site into a future transit oriented development, in conjunction with housing, retail, commercial, open space, and public uses.

The Site, which was a waste disposal site from 1930s until 1959, is located at 3535 Santa Anita Avenue, El Monte, California. Based on a search of the address, SCAQMD staff found that there is a SCAQMD facility ID (176192) for a landfill at this address. While the equipment inventory for this facility specifies no landfill gas collection/control equipment, a SCAQMD Rule 1150 Landfill Excavation plan was submitted for this facility on November 12, 2013, which has expired due to non-payment.

### SCAQMD Staff Comments

Based on the review of the Draft RAP, the cleanup project is subject to the following SCAQMD rules, at a minimum, and it is recommended that the DTSC include these rules in the revise or Final RAP.

#### *Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>1</sup>*

Notification to the SCAQMD is required at least 72 hours and no more than 30 days prior to conducting earthmoving.

#### *Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil<sup>2</sup>*

In the event that disturbing soils contain petroleum hydrocarbons, the cleanup project is subject to the requirements of Rule 1166

#### *Rule 1150 - Excavation of Landfill Sites<sup>3</sup>*

A landfill excavation plan approved by the SCAQMD is required prior to excavation.

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

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

<sup>3</sup> SCAQMD Rule 1150. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1150.pdf>.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities<sup>4</sup>

The cleanup project is subject to the requirements of Rule 1403 if underground asbestos containing Transite pipe is encountered during earthmoving/excavation activities.

Rule 401 – Visible Emissions<sup>5</sup>

If visible emissions are discharged from any single source for periods aggregating more than three minutes in one hour exceeding a shade as dark or darker than Ringelmann No. 1 (20% opacity), the cleanup project is subject to the requirements of Rule 401.

Rule 402 – Nuisance<sup>6</sup>

Rule 402 applies to excessive dust, odors or other air contaminants affecting public health or safety.

Rule 403 – Fugitive Dust<sup>7</sup>

The cleanup project is subject to the requirements of Rule 403 if the cleanup project is capable of generating visible dust in the atmosphere beyond the property line of the emissions source.

SCAQMD Permits

Statewide Portable Equipment Registration is required for certain portable equipment used onsite for less than one year, and SCAQMD permit is required if onsite portable equipment is used for one year or more<sup>8</sup> (California Health and Safety Code Section 41755). Additionally, SCAQMD-permitted High Efficiency Particulate Air (HEPA) vacuums should be used for cleaning operations.

SCAQMD staff is available to work with the DTSC to address any concerns and questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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<sup>4</sup> SCAQMD Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

<sup>5</sup> SCAQMD Rule 401. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

<sup>6</sup> SCAQMD Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

<sup>7</sup> SCAQMD Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>8</sup> SCAQMD Portable Equipment Registration Program (PERP). Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.