



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (RAW) for West Lincoln Assemblage

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. The purpose of the Draft RAW is to remove soil contaminated with chlorinated solvents and establish a land use covenant to require long-term monitoring and soil management for future development on a 7.17-acre site that is located at 1699 West Lincoln Avenue in the City of Anaheim, California.

Due to the described organic solvent-impacted soil and proposed installation of a vapor intrusion mitigation system (VIMS), South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil¹ will be applicable for any excavation, grading, handling, or treating of soil containing volatile organic compounds (VOC). A Rule 1166 Excavation Compliance Plan application shall be submitted to and approved by South Coast AQMD, if a valid Rule 1166 plan has not already been procured, prior to excavating. The Final RAW should also ensure that the removal actions will comply with South Coast AQMD Regulation IV-Prohibitions², such as Rule 401 – Visible Emissions³, Rule 402 – Nuisance⁴, and Rule 403 – Fugitive Dust⁵. Furthermore, the installation and operation of a VIMS may require South Coast AQMD permit approval prior to installation if the proposed system uses a fan or blower to convey vapors in the VIMS and does not satisfy the provisions of South Coast AQMD Rule 219(c)(11)⁶ –Equipment Not Requiring Written Permit Pursuant to Regulation II. If a valid permit has not already been obtained and permit approval is required, a complete permit application shall be submitted to South Coast AQMD accordingly. For more information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD Engineering and Permitting staff, Ms. Angela Shibata, Supervising Air Quality Engineer, at ashibata@aqmd.gov.

If you have other questions or wish to discuss the comments, please feel free to contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

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¹ South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

² South Coast AQMD. Regulation IV. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-iv>.

³ South Coast AQMD. Rule 401. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

⁴ South Coast AQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

⁵ South Coast AQMD. Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁶ South Coast AQMD. Rule 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.