SENT VIA E-MAIL:

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Draft Response Plan for Prairie Avenue Property

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. The Draft Response Plan describes the proposed site clean-up at the former Prairie Avenue Property, located at 19205 Prairie Avenue, adjacent to Torrance Refining Company, LLC, in the City of Torrance. The Draft Response Plan proposes actions that KP Torrance Prairie Owner LLC (KP) will undertake as the property owner to investigate and remediate subsurface contamination including volatile organic compounds (VOCs), by soil vapor extraction in conjunction with bioventing to extract VOCs from the subsurface for aboveground treatment and bioventing to inject air into the subsurface to promote natural biodegradation of petroleum hydrocarbons. Potential VOCs emissions from groundwater remedial actions may be anticipated during well installation or development and will be subject to the requirements of South Coast AOMD Rule 1166 -Volatile Organic Compound Emissions from Decontamination of Soil¹ for excavating, grading, handling, and treating VOCs-contaminated soils. Additionally, it is recommended that the Los Angeles Regional Water Quality Control Board review South Coast AQMD Rule 203 - Permit to Operate² to determine if remedial actions would involve the use of equipment that would require a permit from South Coast AQMD and include a discussion in the Final Response Plan.

If you have any questions or wish to discuss the comments, please feel free to contact Mr. Steve Tsumura, Air Quality Specialist, at stsumura@aqmd.gov or Mr. John Anderson, Air Quality Analysis and Compliance Supervisor, at janderson@aqmd.gov.

Sincerely,

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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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 Rule 203. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf.