



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Remedial Action Plan (RAP) for the Former Union Carbide Torrance Distribution Facility

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. The Department of Toxic Substances Control (DTSC) is developing cleanup actions to remediate soil and groundwater contaminated with arsenic, volatile organic compounds (VOCs), semi-VOCs, dense non-aqueous phase liquid (DNAPL) at a 37-acre site (Site) that is located at 19500 Mariner Avenue near the northeast corner of Mariner Avenue and Voyager Street in the City of Torrance, California. The proposed cleanup actions would involve institutional controls, natural attenuation, excavation and off-site disposal, soil vapor extraction (SVE), and in-situ geochemical stabilization.

Because the proposed cleanup actions would include the installation and operation of a SVE, requirements of South Coast AQMD Rule 201 – Permit to Construct¹ and Rule 203 – Permit to Operate² would apply and should be discussed in the Final RAP. If the proposed cleanup actions would involve earth-moving activities of contaminated soil greater than 50 cubic yards, and arsenic is among the applicable toxic air contaminants listed in Table I of South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants³, it is recommended that the Final RAP include clarifications on if DTSC or other agencies listed in Rule 1466(b) have designated or plan to designate the Site for the contaminant listed as a concern. If the Site is so designated and notified per 1466(b), and thus subject to the South Coast AQMD Rule 1466 requirements, it is recommended that applicable Rule 1466 requirements be incorporated in the Final RAP. More information on Rule 1466 requirements is available on the South Coast AQMD's website⁴.

If you have any questions or wish to discuss the comments, please contact Steve Tsumura, Air Quality Specialist, at stsumura@aqmd.gov. Questions on South Coast AQMD Rule 1466 can be directed to Rule1466@aqmd.gov.

Sincerely,

Lijin Sun

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¹ South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

² South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

³ South Coast AQMD Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

⁴ South Coast AQMD. Compliance. Rule 1466. Accessed at: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.