



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (RAW) for Blake Avenue Homes

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. The following comments on the South Coast AQMD rules, regulations, and permit requirements should be considered by the Department of Toxic Substances Control (DTSC) and included in the Final RAW.

South Coast AQMD Staff's Summary of the Draft RAW

According to the Community Update for the Draft RAW, DTSC is developing cleanup actions to ensure a 3.94-acre site is safe for future development of a residential project by remediating on-site soil contaminated with volatile organic compounds (VOCs) through soil vapor extraction (SVE) or vapor intrusion mitigation system (VIMS) to provide the most extensive long-term protection beneath approximately four acres located at the southeast corner of West Blake Avenue and Rich Street in the City of Los Angeles, California.

South Coast AQMD Staff's Comments

Due to the presence of VOCs in soil, DTSC should ensure that cleanup actions will comply with requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil¹. The Final RAW should also address Rule 1166 requirements for notification and to obtain a required soil mitigation plan prior to any soil handling activities. If the VIMS identified in the Draft RAW would involve installation and operation of sub-slab ventilation systems, a written permit from South Coast AQMD will be required unless the systems can be exempt from the written permit requirements under South Coast AQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II, subparagraph (c)(11)². In addition, since the cleanup actions would involve installation and operation of a SVE system, complete and timely permit applications for a Permit to Construct and a Permit to Operate for the SVE system will be required under South Coast AQMD Rule 201 – Permit to Construct³ and Rule 203 – Permit to Operate⁴.

If you have any questions or wish to discuss the comments, please feel free to contact Steve Tsumura, Air Quality Specialist, at stsumura@aqmd.gov.

Sincerely,

Lijin Sun

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Program Supervisor, CEQA IGR
Planning, Rule Development and 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 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.

³ South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁴ South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>