



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Feasibility Study/Remedial Action Plan for Former Ford Aeronutronics Facility

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 Santa Ana Regional Water Quality Control Board (Water Board) and included in the Final Feasibility Studies/Remedial Action Plan (FS/RAP).

South Coast AQMD Staff's Summary of Draft FS/RAP

According to the Community Update for the Draft FS/RAP, the Water Board is proposing to remediate volatile organic compounds (VOCs) in soil and groundwater at the former Ford Aeronutronics facility (Site) through natural attenuation in groundwater and soil, soil vapor extraction (SVE), and sub-slab depressurization systems (SSD) beneath the 200-acre Site located at 1000 Ford Road on the southeast corner of MacArthur Boulevard and Bonita Canyon Drive in the City of Newport Beach.

South Coast AQMD Staff's Comments

Due to the presence of VOCs in soil, the Water Board 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 FS/RAP should also address Rule 1166 requirements for notification and to obtain a required soil mitigation plan prior to any soil handling activities. If the SSD identified in the Draft FS/RAP 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 soil vapor extraction (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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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>