



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (RAW) for the New Los Angeles Charter School

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 remediate soil contaminated with volatile organic compounds (VOCs) and total petroleum hydrocarbons through engineering controls with performance monitoring (i.e., inspection and maintenance of existing cap and indoor air monitoring), and establish a land use covenant to inform future owner and tenants of residual contamination beneath a 0.65-acre site that is located at 1919 South Burnside Avenue on the northwest side of South Burnside Avenue and West Washington Boulevard 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 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 engineering controls 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 II², subparagraph (c)(11). In addition, if 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 (which includes air injection wells) will be required under South Coast AQMD Rule 201 – Permit to Construct³ and Rule 203 – Permit to

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>

Operate⁴. If implementation of cleanup activities requires modifications to on-site buildings, requirements of South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities⁵ and U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos⁶ will apply and should be discussed in the Final RAW.

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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Planning, Rule Development and Area Sources

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

⁵ South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

⁶ 40 CFR, Chapter 61, Subpart M. Accessed at: http://www.swcleanair.org/docs/misc/NES_Asbestos.pdf.