



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Removal Action Workplan (RAW) for Former B Two Industries, Inc.

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 excavate, dispose, and remediate soil contaminated with volatile organic compounds (VOCs) via installation and operation of a soil vapor extraction (SVE) system, and establish a land use covenant to restrict future land uses to commercial or industrial operations on a 1.73-acre site that is located at 16539 South Main Street near the southwest corner of South Main Street and East Gardena Boulevard in the City of Carson within the designated AB 617 Wilmington, Carson, West Long Beach community.

South Coast AQMD Staff's Comments

Due to the presence of VOCs in soil, DTSC should ensure that excavation and soil movement operations 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 soil handling activities. It is also recommended that DTSC evaluate and discuss in the Final RAW that the cleanup actions comply with South Coast AQMD Regulation IV-Prohibitions², such as Rule 401 – Visible Emissions³, Rule 402 – Nuisance⁴, and Rule 403 – Fugitive Dust⁵, Regulation XIII – New Source Review⁶, and Rule 1401 – New Source Review of Toxic Air Contaminants⁷.

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. Regulation IV. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-iv>.

³ South Coast AQMD. Rule 401. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

⁴ South Coast AQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

⁵ South Coast AQMD. Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁶ South Coast AQMD. Regulation XIII. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiii/reg-xiii-table-of-contents.pdf>.

If implementation of cleanup activities requires modifications to on-site buildings, requirements of South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities⁸ and U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos⁹ will apply. Moreover, because the cleanup actions will involve, among others, excavation of soil containing VOCs, and installation and operation of new equipment, complete and timely permit/plan applications to South Coast AQMD as follows will be required.

- Application for a Permit to Construct and a Permit to Operate for the proposed new SVE system (which includes air injection wells). It is recommended that DTSC review and discuss the requirements of South Coast AQMD Rule 201 – Permit to Construct¹⁰ and Rule 203 – Permit to Operate¹¹ in the Final RAW.
- Application for a South Coast AQMD Rule 1166 Excavation Compliance Plan(s) for the proposed soil excavation, grading, and handling.

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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⁷ South Coast AQMD. Rule 1401. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

⁸ South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

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

¹⁰ South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹¹ South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>