



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Response Plan (DRP) for the Sunrise Village Project **(Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the Community Update Public Notice, the Draft Response Plan (DRP) is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to remediate the soil and soil gas contaminated with solvent volatile organic compounds (VOCs) located at 1801 North Euclid Street, Fullerton. The purpose of this plan is to evaluate and propose three distinct remedial alternatives for the site cleanup, and the following cleanup alternatives are being proposed for the Site: 1) Chloroform-contaminated soil excavation and off-site disposal; and 2) Vapor intrusion mitigation system (VIMS).

Due to the presence of VOCs in soil, ensuring compliance with the South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil¹ is essential. The Final Response Plan should also address Rule 1166 requirements for notification and obtain a required soil mitigation plan prior to any soil handling activities. The cleanup activity, such as excavation or soil movement and off-site disposal of contaminated soil, may generate fugitive dust during the hauling trips to the South Coast AQMD region; the requirements of South Coast AQMD Rule 403 – Fugitive Dust² may apply and should be discussed in the cleanup plan. South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants³ may also apply if the facility is designated and notified per Rule 1466(b)(1) and if the quantities of contaminated soil exceed 50 cubic yards. Rule 201 – Permit to Construct⁴ may also apply to the VIMS before the construction. Thus, questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

¹ South Coast AQMD. Rule 1166 - - Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

² South Coast AQMD Rule 403 - Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

³ South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>

⁴ South Coast AQMD's Rule 201 – Permit to Construct. Access at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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SW:DN

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