



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

November 7, 2023

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## **Draft Removal Action Workplan (RAW) for the Eco Cleaners Cleanup 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 is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC). The draft RAW is a proposed cleanup plan to address areas of soil and soil vapor contaminated with volatile organic compounds (VOCs). The purpose of this plan is to evaluate and propose three distinct remedial alternatives for the site cleanup. These alternatives include: 1) Soil excavation and off-site disposal. 2) Ground level separation by building an underground parking garage and installation of vapor barriers, and Passive Venting Soil Vapor Extraction (SVE) system to clean up soil contaminants. 3) No Action. The project is bounded by Highway 71 to the north and east, Chino Hills Parkway to the south, and Pipeline Avenue to the west in San Bernardino.

The proposed remedial actions would involve the installation and use 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 Construct<sup>1</sup> and Rule 203 – Permit to Operate<sup>2</sup>. In addition, South Coast AQMD’s Rule 403 – Fugitive Dust<sup>3</sup> will also apply for any soil movement/disturbance activities. Volatile organic compounds are regulated under South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>4</sup> and should be evaluated to determine applicability to the proposed soil movement activities. South Coast AQMD’s Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>5</sup> 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.

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<sup>1</sup> South Coast AQMD Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

<sup>2</sup> South Coast AQMD Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

<sup>3</sup> South Coast AQMD’s Rule 403 – Fugitive Dust and its compliance requirement can be found at <https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information>

<sup>4</sup> South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

<sup>5</sup> 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>

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 Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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SBC231004-11

Control Number