



South Coast Air Quality Management District

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Draft Interim Removal Action Workplan (IRAW) for the Trelleborg Sealing Solutions Site (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 IRAW is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to assist in the soil movement and includes the necessary sampling protocols and procedures to ensure that the Draft IRAW fieldwork activities, prior to the construction of the park, are aligned with applicable regulations. CoorsTek, Inc. historically occupied the site, and the operation generated hazardous waste that contained lead, aqueous solution containing reactive anions, bromate, chlorate, cyanide, fluoride, hypochlorite, nitrite, perchlorates, and sulfide anions. Historical and current investigations identified that Volatile Organic Compounds (VOCs), including Trichloroethene (TCE) and Tetrachloroethene (PCE), are present in the soil gas and TCE in groundwater at concentrations above the acceptable regulatory screening levels. The Draft IRAW considered three cleanup alternatives: Soil Excavation and Off-Site Disposal, Sub-Slab Depressurization, and In-Situ Soil Vapor Extraction. The last alternative, In-Situ Soil Vapor Extraction, is proposed for the Site.

Due to the presence of VOCs in soil, ensuring compliance with the South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil is essential.¹ The Final RAW should also address Rule 1166 requirements for notification and obtain a required soil mitigation plan prior to any soil handling activities. Additionally, according to the SMP, the city intends to remove the top two feet of soil and replace it with uncontaminated soil. Consequently, the Final RAW should also address South Coast AQMD's Rule 403 – Fugitive Dust² for any soil movement/disturbance activities. South Coast AQMD's Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants³ may also apply if the facility is

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

² 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>

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>

designated and notified per Rule 1466(b)(1) and if the quantities of contaminated soil exceed 50 cubic yards.

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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