



# South Coast Air Quality Management District

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## **Proposed Draft Removal Action Workplan (RAW) for South Gate Educational Center**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document and would like to be included in future public participation activities associated with the cleanup effort (“project”) at the 18.5-acre South Gate Educational Center (“site”). If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, the SCAQMD staff should be consulted in advance of the project start to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of operation. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the revised or Final RAW, as appropriate.

As stated in the Draft RAW, the project will require excavation of approximately 75 cubic yards of soil and export to a licensed disposal facility. Past remedial investigations indicated that the soil in several areas of the site is contaminated with petroleum hydrocarbons (TPH). The SCAQMD staff would like to remind the Lead Agency that disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. SCAQMD Rule 1166 should be incorporated during the development of the Final RAW. Furthermore, the Final RAW should also discuss how the project will comply with SCAQMD Rule 402 – Nuisance, if volatile organic compounds and/or odors are emitted during soil disturbance activities.

SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR, at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final RAW associated with this project.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC  
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