



South Coast Air Quality Management District

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South Coast
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SENT VIA E-MAIL AND USPS:

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Interim Remedial Measures Work Plan for Cherry Aerospace, 1224 E. Warner Ave., Santa Ana

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 at the Cherry Aerospace (Site, Facility, or Project). The purpose of the Interim Remedial Measures Work Plan (IRMWP)¹ is to contain and remove the volatile organic compounds (VOCs) and 1, 4-dioxane in groundwater and soil on 15.5 acres. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of any remedial activity. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final Work Plan, as appropriate.

As stated above, VOCs and 1, 4-dioxane are found in groundwater and soil. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil². SCAQMD Rule 1166 should be incorporated during the development of the Final Work Plan. Furthermore, the Final Work Plan should also discuss how the remedial measures will comply with SCAQMD Rule 402 – Nuisance³, in the event that the VOCs and/or odors are emitted during soil disturbance activities.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov or Daniel Garcia, Program Supervisor, at dgarcia@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

ORC180515-06

Control Number

¹ The DTSC has reviewed the remedial measures proposed in the IRMWP for the Site and determined that the measures are not expected to result in any significant impacts on human health and the environment triggering any changes to the finding of the 2015 Negative Declaration. As such, the DTSC has prepared an addendum to the Negative Declaration and plans to file a Notice of Determination with the State Clearinghouse.

² SCAQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

³ SCAQMD. Rule 402. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.