



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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May 4, 2021

Mitigated Negative Declaration (MND) for the Proposed Burbank Operable Unit Remediation System Upgrades Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments on South Coast AQMD rules and permits should be considered by Burbank Water and Power (the CEQA Lead Agency) and incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a new groundwater extraction well and two replacement groundwater extraction wells, conveyance pipelines, intertie pipeline and underground vaults to deliver treated water, install piezometers, modify existing Burbank Operable Unit (BOU) remediation system extraction wells with installation of variable frequency drives, and install additional treatment units for advanced oxidation (Proposed Project). The Proposed Project is generally located on the southeast corner of Vanowen Street and Clybourn Avenue within the City of Burbank. Construction is anticipated to last two years¹.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section of the MND, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized air quality impacts would be less than significant². In the MND, the Lead Agency stated that the Proposed Project would result in negligible emissions and overall operations would be less than significant³.

South Coast AQMD Rules, Permits, and CEQA Responsible Agency

The MND included a discussion of processes related to groundwater treatment systems, including, but not limited to, air strippers, adsorbers, and process tanks. South Coast AQMD rules and regulations that may pertain to the Proposed Project include, but are not limited to, the following that the Lead Agency should review applicability and discuss in the Final MND: Rule 201 – Permit to Construct⁴, Rule 203—Permit to Operate⁵, Rule 401 – Visible Emissions⁶, Rule

¹ MND. Page 2-12.

² MND. Page 4-8.

³ MND. Page 4-9.

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

⁵ South Coast AQMD. Rule 203 – Permit to Operate. <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

402 – Nuisance⁷, Rule 403 – Fugitive Dust⁸, Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil⁹, Regulation XIII—New Source Review¹⁰, and Rule 1401 – New Source Review of Toxic Air Contaminants¹¹.

If implementation of the Proposed Project requires permits from South Coast AQMD (e.g., South Coast AQMD Rule 1166 Excavation Compliance Plan for excavation work associated with preparation and/or construction of the Proposed Project; groundwater treatment system such as air strippers, adsorbers, and process tanks; and stationary engines powering pumps or providing standby backup power during emergency uses if the engines are rated above 50 brake horsepower), the Lead Agency should identify South Coast AQMD as a Responsible Agency (CEQA Guidelines Section 15381) in the Final MND. It is important that the permits are fully and adequately evaluated in the Final MND as required under CEQA Guidelines Section 15096(b). It is also important to note that the assumptions in the air quality analysis in the Final MND will be used as the basis for evaluating permits under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

⁶ South Coast AQMD. Rule 401 – Visible Emissions. <http://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-401-visible-emissions.pdf>.

⁷ South Coast AQMD. Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

⁸ South Coast AQMD Rule 403 – Fugitive Dust. <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁹ South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

¹⁰ Regulation XIII – New Source Review. Accessed at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>.

¹¹ South Coast AQMD. Rule 1401 – Air Toxics. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

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May 4, 2021

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 Margaret Isied, Air Quality Specialist, at misied@aqmd.gov, should you have any questions.

Sincerely,

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Planning, Rule Development & Area Sources

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