South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
JOnyebuchi@burbankca.gov

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Joseph Onyebuchi, Associate Planner
City of Burbank
Community Development Department - Planning Division
150 North Third Street
Burbank, CA 91502

Draft Supplemental Environmental Impact Report (SEIR) for the Soil Vapor Extraction System Upgrade Project (Proposed Project) (SCH No: 1995061010)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Burbank is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

Summary of Proposed Project Information in the Draft SEIR

Based on the Draft SEIR, the Proposed Project consists of four main elements: 1) dismantling and removal of the existing legacy soil vapor extraction (SVE) treatment plant and associated structures; 2) installation of an upgraded SVE treatment system; 3) installation of 27 additional SVE wells; and 4) installation of an underground piping network to connect the new wells to the proposed SVE treatment system.[1] The Proposed Project includes two main areas: the SVE Treatment Plant Property at 1234 North Victory Place and the SVE Well Field at 1501 North Victory Place, 1800 West Empire Avenue, and 1301 North Victory Place.[2] The proposed SVE treatment system would include aboveground vapor treatment equipment and its connected piping and controls, inlet moisture separators, a vapor extraction blower, air compressor, liquid storage tanks, and vapor-phase granular activated carbon (V-GAC) vessels.[3] In addition, the proposed SVE treatment system would initially include a cryogenic cooling/condensation (C3) treatment unit during Phase I of operation, and after Phase I is concluded, the C3 system would be replaced with a fully carbon-based system for Phase II operation.[4] The proposed SVE treatment system would have a maximum vapor flow of 500 standard cubic feet per minute (scfm).[5] Based on a review of aerial imagery, the nearest sensitive receptors (e.g., residences) appear to be locatedwithin 300 feet south of the Proposed Project site. Construction is anticipated to begin in the third quarter of 2026 and conclude in the third quarter of 2027, with a total construction

[1] Draft SEIR. p. 2-16.
[2] *Ibid*. p. 2-7.
[3] *Ibid*. p. 2-17.
[4] *Ibid*.
[5] *Ibid*.

duration of up to 11 months.[6] The operational lifetime of the Proposed Project is estimated to be 8.5 years.[7]

South Coast AQMD Comments

Inconsistency in Construction Duration

The Draft SEIR indicates that construction of the Proposed Project is anticipated to occur over a period of up to 11 months.[8] However, Appendix D (Air Quality Analysis Technical Memorandum) identifies a construction duration of up to 16 months.[9] This discrepancy in the assumed construction schedule raises concerns regarding whether the construction-related emissions estimates and the resulting air quality impact significance determinations adequately reflect the anticipated construction activities and schedule. Therefore, it is recommended that the Lead Agency to reconcile the inconsistency, verify the appropriate construction schedule, and revise the construction emissions analysis, as necessary, to ensure that the emissions estimates and significance determinations are based on consistent and accurate project assumptions. The revised analysis, including the supporting assumptions and evidence, should be included in the Final SEIR.

Potential Underestimated Construction and Operation Emissions Analysis

The Draft SEIR indicates that non-hazardous demolition debris would be transported to a disposal facility located approximately 30 miles from the Proposed Project site, while spent carbon would be transported to a facility located approximately 200 miles away.[10] However, the California Emission Estimator Modeling (CalEEMod) output files provided in Appendix D indicate that a default hauling distance of 20 miles was assumed for the construction emissions calculations. The use of this default distance, rather than the actual hauling distances identified in the Draft SEIR, may result in an underestimation of construction-related mobile-source emissions associated with material hauling and disposal. Therefore, the Lead Agency is recommended to revise the CalEEMod inputs to reflect the actual hauling distances and update the construction and operational emissions analysis accordingly. The revised emissions analysis, including the supporting assumptions, model inputs, and documentation substantiating the hauling distances, should be provided in the Final SEIR.

Outdated AERMET and Meteorological Data in AERMOD Modeling

Based on the review of the AERMOD modeling files, the data from AERMET Version 9 was used in the analysis. However, South Coast AQMD released a newer, approved version of AERMOD-ready MET data files (Version 11) in October 2024.[11] The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.[12] The U.S. EPA's current preferred and

[6] *Ibid*. p. 2.23.
[7] *Ibid*. p. 2-26.
[8] *Ibid*. p. 2-23.
[9] Appendix D (Air Quality Analysis Technical Memorandum). p. 2.
[10] Draft SEIR. p. 2-26.
[11] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html
[12] South Coast AQMD Data for AERMOD available at https://www.aqmd.gov/home/air-quality/meteorological-data/data-foraermod

recommended meteorological data preprocessor for AERMOD is AERMET version 24142, which was released in November 2024.[13]

The use of outdated meteorological data for the analysis contained in the Draft EIR is inconsistent with the U.S. EPA's Guidelines on Air Quality Models (40 CFR Part 51, Appendix W)[14] and likely resulted in inaccurate or underestimated health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency is recommended to re-run the air dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET.

South Coast AQMD Air Permits, Role as a Responsible Agency

Since the Proposed Project would require an installation of the SVE treatment system and supporting equipment, such as inlet moisture separators, a vapor extraction blower, air compressor, liquid storage tanks, and vapor-phase granular activated carbon (V-GAC) vessels, the air permits from South Coast AQMD will be required. The Final SEIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[15] Rule 203 – Permit to Operate,[16] Rule 401 – Visible Emissions,[17] Rule 402 – Nuisance,[18] Rule 403 – Fugitive Dust,[19] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[20] Rule 1113 – Architectural Coatings,[21] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, Regulation XIII – New Source Review,[22] Rule 1401 – New Source Review of Toxic Air Contaminants,[23] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[24] etc. Since air permits from South Coast AQMD will be required for the Proposed Project, the role of South Coast AQMD has changed from a Commenting Agency to a Responsible Agency under CEQA. In addition, the Lead Agency is required to consult with South Coast AQMD as a Responsible Agency per CEQA Guidelines Section 15086.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the

[13] U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at https://www.epa.gov/scram/meteorological-processors-and-accessory-programs
[14] Code of Federal Regulations. Title 40. Part 51. Appendix W available at https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051
[15] South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[16] South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[17] South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[18] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[19] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[20] South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[21] South Coast AQMD, Rule 1113 is available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[22] South Coast AQMD, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[23] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[24] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project, as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting Staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a) and (b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final SEIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final SEIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are 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 or me at swang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

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