

NOTICE OF PREPARATION

Date: March 6, 2025

To: Public Agencies and Other Interested Parties

From: City of Burbank Community Development Department Planning Division 150 North Third Street Burbank, California 91502



Subject: Notice of Preparation of a Supplemental Environmental Impact Report for the Soil Vapor Extraction System Upgrade Project

The City of Burbank (City) is the Lead Agency and will prepare a Supplemental Environmental Impact Report (SEIR) for the Soil Vapor Extraction System Upgrade Project (Project), pursuant to Section 15163 of the CEQA Guidelines (Title 14 of the California Code of Regulations, hereinafter the "CEQA Guidelines"). This environmental document will supplement the Proposed Lockheed Soil Vapor Extraction System Focused EIR (State Clearinghouse No. 1995061010).

In accordance with CEQA Guidelines Section 15082, the City has prepared this Notice of Preparation (NOP) to provide the Office of Land Use and Climate Innovation, responsible and trustee agencies, and other interested parties with sufficient information describing the Project and its potential environmental effects. Additionally, as detailed below, a Public Scoping Meeting will be held to receive input regarding the proposed Project and the environmental topics to be addressed in the SEIR.

CEQA Guidelines Section 15163 states that a lead agency may choose to prepare a Supplement to an EIR rather than a subsequent EIR if proposed changes meet the conditions described in CEQA Guidelines Section 15162 and if only minor additions and changes would be necessary to make the previous EIR adequate. Because the City has determined that a SEIR will be prepared for the proposed Project, an Initial Study has not been prepared (CEQA Guidelines Section 15063[a]).

The SEIR will address the source area removal action that is a continuation of past remediation efforts including the operation of a soil vapor extraction (SVE) treatment system (Original Project) at a portion of the former Lockheed Martin (LM or Applicant) Plant B-1 site, focusing on reducing concentrations of volatile organic compounds (VOCs) within two source areas, per Cleanup and Abatement Order No. 87-161 by the Los Angeles Regional Water Quality Control Board (LARWCQB). Proposed remediation efforts would generally be located at 1234 North Victory Place, 1501 North Victory Place, 1800 West Empire Avenue, and 1301 North Victory Place (Project Site).

The NOP and Information Package can be accessed on the City's website at: https://www.burbankca.gov/web/community-development/1234-n.-victory-place-lockheed-martin.

As specified by the CEQA Guidelines, the NOP will be circulated for a 30-day review period. The comment period runs from March 6, 2025 through April 4, 2025. The City welcomes input on the scope of analysis during the review period. If the City has not received either a response or a well-justified request for



additional time by a responsible agency by the end of the review period, the City will presume that the responsible agency has no response (CEQA Guidelines Section 15082[b][2]).

Due to the time limits mandated by State law, your response must be sent at the earliest possible time, but no later than **5:00 P.M. on April 4, 2025**. Please send your response to:

City of Burbank, Community Development Department, Planning Division Attention: Joseph Onyebuchi, Associate Planner 150 North Third Street, P.O. Box 6459, Burbank, California 91502

You may also email your response to **JOnyebuchi@burbankca.gov**. Please provide the name of a contact person at your agency.

CEQA provides for a lead agency to facilitate one or more scoping meetings, which provide opportunity for determining the scope and content of the SEIR.

A SEIR Public Scoping Meeting will be held in person at 150 N. Third Street in Room 104 on **March 20**, **2025**, and will begin at 6:00 P.M. and conclude at 7:00 P.M. The purpose of this meeting is to provide an update on the Project, an overview of the CEQA process, the timeline for environmental review, and to solicit input from interested parties on the proposed content of the SEIR. The meeting will be recorded and will be made available on the City's website after the Scoping Meeting.

Areas of Project Impact:

Environmental effects are anticipated in the following categories: Air Quality (including Health Risk Assessment), Biological Resources, Cultural Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Noise. The City has determined that an SEIR is required for this Project. Therefore, as allowed under CEQA Guidelines Section 15063(a), the City has not prepared an Initial Study and will instead begin work directly on the SEIR, as allowed under CEQA Guidelines Section 15081002(e). Since the adopted 1995 SEIR was certified, additional environmental topics including Agriculture and Forestry Resources, Greenhouse Gas Emissions, Energy, Tribal Cultural Resources, and Wildfire were included in the CEQA Guidelines. Furthermore, numerous changes to State and regional regulations such as the South Coast Air Quality Management District (SCAQMD) and LARWQCB requirements have occurred. Therefore, all topics required by CEQA will be addressed as part of the SEIR.

March 6, 2025

Signature:

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PROJECT INFORMATION PACKET

The following sections provide an overview of the Project's background and context, identifies the Project's location, and describes the Project to be evaluated through an SEIR, which will be prepared in accordance with CEQA Guidelines Section 15163.

INTRODUCTION

The Proposed Project constitutes a source area removal action that is a continuation of past remediation efforts (including the operation of a soil vapor extraction [SVE] treatment system [Original Project]) at a portion of the former Lockheed Martin ("LM" or "Applicant") Plant B-1 site, focusing on reducing concentrations of volatile organic compounds (VOCs) within two source areas, per Cleanup and Abatement Order (Order) No. 87-161 by the Los Angeles Regional Water Quality Control Board (LARWCQB). Proposed remediation efforts would generally be located at 1234 North Victory Place, 1501 North Victory Place, 1800 West Empire Avenue, and 1301 North Victory Place (Project Site) in the City of Burbank. Although the legacy SVE treatment system installed for the Original Project removed a substantial amount of VOCs from impacted areas within the former Plant B-1 site, elevated concentrations of VOCs remain in the subsurface soils at and around two smaller, more localized source areas, VMP-3 and VMP-5 (defined below), within the Project Site. The mothballed legacy SVE treatment plant of the legacy SVE treatment system is no longer capable of meeting the Order requirements. As such, the Proposed Project would replace the legacy SVE treatment system with a smaller, more efficient system capable of handling the lower flowrates and higher VOC concentrations anticipated during source area removal. Although the entire former Plant B-1 site is over 100 acres, the Project Site for the Proposed Project comprises a smaller portion of the former Plant B-1 site associated with the proposed remediation of source areas VMP-3 and VMP-5.

This Project Description provides: (1) a project background describing former activities within the Project Site; (2) a summary of existing on-site and off-site land uses; (3) a comparison of the Proposed Project and the Original Project; (4) a detailed description of the Proposed Project; (5) Proposed Project objectives; and (6) a list of discretionary approvals required to implement the Proposed Project, if approved by the City.

PROJECT BACKGROUND

Lockheed Martin Former Plant B-1

The LM former Plant B-1 occupied approximately 100 acres of land located at 1705 North Victory Place (Site ID No. 2040060), southeast of Bob Hope Airport (commonly known as Hollywood Burbank Airport), from 1928 to 1991. The plant was used for aircraft parts fabrication and assembly and involved the use of chemicals and materials, including fuels, oils, solvents, paints, acids, plating solutions, and other compounds. As a result of the long-term use of these compounds, impacts to the soil and groundwater beneath Plant B-1 occurred. Numerous environmental investigations and assessments have been conducted by LM to characterize and delineate the extent of the impacts, which are predominantly the VOC solvents tetrachloroethylene (PCE) and trichloroethylene (TCE), as well as carbon tetrachloride (CCl4) and vinyl chloride (VC). In 1987, LM was issued the Order No. 87-161 by the LARWQCB to determine the sources and extent of impacts to soil and groundwater, and to remediate VOCs in the soil and groundwater beneath the site, pursuant to Section 13304 of the California Water Code. The Order remains active today.



Plant B-1 was demolished beginning in 1992, and shallow contaminated soil (about 10 feet deep) was excavated and removed. LM filed a Conditional Use Permit (CUP) application in 1994 with the City of Burbank to allow a SVE treatment system to remediate the deeper VOCs at the former Plant B-1 site per the LARWQCB's Order. The City prepared a draft EIR and subsequently certified the EIR and approved the CUP in 1995. The SVE treatment system began operation in 1997. The property was subsequently sold by LM, and the former Plant B-1 site was redeveloped in 2000 as a retail shopping center (Burbank Empire Center; Planned Development [PD] 97-3) while the SVE system operation was retained by LM. See below for additional information regarding the Adopted 1995 EIR (defined below) and activities after the adoption of the Adopted 1995 EIR.

Adopted 1995 EIR

In 1995, the City of Burbank, as the Lead Agency, certified an EIR (State Clearinghouse No. 95061010) for the construction, operation, and the future decommissioning and dismantling of an SVE treatment system and associated components at the former Plant B-1 site. The objective of the Original Project was to restore the remaining approximately 10 acres of impacted soil located at the eastern end of the former Plant B-1 site along North Victory Place to a condition satisfactory to the LARWQCB, such that further remedial action and monitoring would no longer be necessary. The Adopted 1995 EIR evaluated potential impacts related to geologic hazards, water, air quality (including a health risk assessment), risk of upset (health risk hazards), and cumulative impacts, and determined that the impacts were not significant, can be avoided, or substantially lessened to less than significant levels with implementation of mitigation.

The Original Project lifetime was expected to be 8.5 years. The proposed system included a 50-foot-high emission stack, which required Planning Board approval of a CUP since it would be a structure greater than 35 feet in height.

Background Since Adoption of the Adopted 1995 EIR

Since the Adopted 1995 EIR was certified, the SVE treatment system began operation in 1997 under CUP 94-13. The property containing the former Plant B-1 site was subsequently sold by LM, and the former Plant B-1 site was redeveloped in 2000 as a retail shopping center (Burbank Empire Center; PD 97-3) while the SVE treatment system operation was outsourced from 2000 to 2012 under a performance agreement intended to achieve VOC removal and a No Further Requirements approval from the LARWQCB. In 2012, the agreement was terminated, and LM regained operation of the SVE treatment system. The Burbank Empire Center is a retail shopping center that consists of multiple buildings, asphalt paved parking lots, roadways, and landscaped areas.

The legacy SVE treatment system consists of an SVE well field and associated piping manifold system in a roughly 10-acre area beneath the northeastern portion of the Burbank Empire Center, and a treatment plant southeast of the Burbank Empire Center. The SVE well field consists of 217 legacy SVE wells that range in depth from roughly 10 feet below ground surface (bgs) to 165 feet bgs. The legacy SVE wells connect to a series of branch lines that lead to two main piping headers that route the vapors to the treatment plant. The legacy SVE treatment plant is equipped with vacuum blowers designed to extract roughly 6,000 standard cubic feet of air per minute (SCFM). Additional information on existing conditions of the legacy SVE system can be found in Existing Site Conditions, below.

The legacy SVE treatment system operated until 2002 at which time it was switched to pulse operation due to decreasing VOC concentrations. In late 2009, the system was deactivated with LARWQCB



concurrence for a rebound test, after which the system was mothballed. Although past cleanup efforts removed a significant amount of VOCs from impacted areas within the former Plant B-1 site, subsequent investigations in 2010 and 2015 found that residual, elevated concentrations of VOCs remain in the subsurface soils at and around vapor monitoring points (VMP) VMP-3 and VMP-5. Under the LARWQCB's oversight, additional assessments of the subsurface soils were performed in the vicinity of VMP-3 and VMP-5 in 2017 and 2018. Based on the results of the 2017 and 2018 investigations, residual sources of VOCs in soil appear to be localized in two distinct fine-grained zones and attenuate to much lower concentrations over small distances. LM subsequently prepared a Source Area Removal Plan (SARP) documenting modifications proposed to the legacy SVE treatment system to remediate VMP-3 and VMP-5. The SARP found that the mothballed legacy SVE treatment plant of the legacy SVE treatment system is no longer capable of meeting the Order requirements, and that an alternative vapor treatment method would be more cost-effective and/or more operationally reliable. As such, the SARP proposes to replace the legacy SVE treatment system with a smaller, more efficient system capable of handling the lower flow rates and higher VOC concentrations anticipated during source area removal. The SARP also stated that 27 new SVE wells will be necessary to remediate the two source areas, as it was found that the existing SVE well network cannot adequately target the source areas due to their location and lack of access to the proposed SVE wells. LARWQCB approved the SARP in 2019, including the above described conceptual/preliminary design Thereafter, final design documents were created and provided to the LARWCQB in 2020, which were accepted without comment.

PROJECT LOCATION AND ACCESS

As shown **in Figure 1: Regional Vicinity Map**, the proposed Project is located in the central portion of the City. The Project site consists two main areas: 1) the property at 1234 North Victory Place, which is northwest of the intersection of North Victory Place and railroad tracks owned by the Los Angeles County Metropolitan Transportation Authority (Metro) and Amtrak (Assessor Parcel Number [APN] 2462-017-020) (SVE Treatment plant property); and 2) the portion of the Project Site generally located at 1501 North Victory Place, 1800 West Empire Avenue, and 1301 North Victory Place within the parking lots of the northeastern portion of the Empire Center (APN 2462-017-18, -29, -030, -032) (SVE well field). The entire Project Site is shown in **Figure 2: Local Vicinity Map**.

Regional access to the Project Site is provided via Interstate 5 (I-5), which travels in a northwest-southeast orientation across North Victory Place from the Project Site, approximately 250 feet northeast of the Project Site. Local vehicular access to the Project Site is provided via North Victory Place and Empire Avenue to the north. Pedestrian access is provided via an existing sidewalk along the North Victory Place abutting the northern boundary of the Project Site.

Public transit access in proximity to the Project Site includes the Empire/Valpreda and Empire/Lincoln bus stops, which are located approximately 430 feet northwest and 0.24-mile northwest of the Project Site, respectively; both serve Metro lines 165 and 294. The Project Site is also served by the Empire/Buena Vista bus stop, which is located approximately 0.37-mile northwest of the Project Site and is served by the City of Burbank NoHo to Airport bus route. The Hollywood Burbank Airport is located approximately 1.3 miles northwest of the Project Site.



SOURCE: Nearmaps, 2024



FIGURE 1: Regional Vicinity Map

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



SOURCE: Google Earth, 2024



FIGURE 2: Site Vicinity Map

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



EXISTING SITE CONDITIONS

SVE Treatment Plant Property (APN 2462-017-020)

The portion of the Project Site located at 1234 North Victory Place, northwest of the intersection between North Victory Place and the railroad tracks (APN 2462-017-020) (SVE treatment plant property) is an approximately 83,500 square foot (SF) lot that is vacant except for an approximately 6,000 SF, one-story building that was constructed in 1996/1997 to house a temporary SVE treatment plant that has been idle since 2009, and approximately 9,000 SF of equipment with screened enclosures. The developed portion of the property site consists of asphalt pavement, concrete pads, and the treatment system building made up of concrete masonry unit blocks. The enclosure surrounding the equipment area is made of concrete blocks and steel screen. The one-story building and screen enclosure are 20 feet tall, except for a 50-foot exhaust stack. The SVE treatment plant property is vacant and mostly consisting of exposed soil and ruderal vegetation. Ten existing palm trees are on the southern portion of the SVE treatment plant property also currently contains five parking spaces.

SVE Well Field (APNs 2462-017-018, -029, -30, -032)

The SVE well field of the legacy SVE treatment system includes 217 SVE wells and their associated piping manifold system in a roughly 10-acre area beneath the parking lots on the northeastern portion of the Burbank Empire Center. The wells, which range in depth from roughly 10 feet bgs to 165 feet bgs, are connected to 11 branch lines; these wells and branch lines are generally located at 1501 North Victory Place (APN 2462-017-30) and 1800 West Empire Avenue (APN 2462-017-18). The branch lines lead to two main piping headers (one low-vacuum [low-vac] and one high-vacuum [high-vac]) that are generally located along the northeastern boundary of the SVE well field at 1501 North Victory Place, 1800 West Empire Avenue, and 1301 North Victory Place (APNs 2462-017-029, -032), that route the vapors to the existing legacy SVE treatment plant on the SVE treatment plant property. All existing SVE wells and piping are buried 10 to 20 feet bgs and are inaccessible from the ground surface. Access is limited to seven underground vaults where branch lines connect with piping headers.



SURROUNDING LAND USES

As shown in **Figure 2** and **Table 1: Project Site and Surrounding Uses**, surrounding land uses around the Project Site include the Metrolink Antelope Valley line railroad tracks and the I-5 to the north as well as commercial and single-family residential uses farther north across North Victory Place, the Metrolink Antelope Valley line railroad tracks, and the I-5; and the Animal Walk of Fame animal shelter, Burbank Animal Shelter, and the Metrolink Antelope Valley line railroad tracks to the east across North Victory Place. To the south are railroad tracks serving the Metrolink Ventura County, Amtrak Pacific Surfliner, and Amtrak Coast Starlight lines and commercial uses including a Costco farther the south across the railroad tracks. To the west is the remainder of the Burbank Empire Center.

	Existing Land Use	Existing Land Use Category	Existing Zoning Designation		
Project Site – SVE Treatment Plant Property	Existing legacy SVE treatment plant	Regional Commercial	M-2 – General Industrial		
Project Site – SVE Well Field	Parking lots on the northeastern portion of Burbank Empire Center	Regional Commercial	PD 97-3 – Planned Development		
North	Metrolink railroad tracks, Commercial uses, single- family residential uses	Institutional, Regional Commercial adjacent to the Project Site; Corridor Commercial, Medium Density Residential, High Density Residential farther north	RR – Railroad, M-2 – General Industrial adjacent to the Project Site; R-3 – Medium Density Residential, R-4 – High Density Residential, NSFC – North San Fernando Commercial farther north		
South	Remainder of Burbank Empire Center, Metrolink railroad tracks, commercial uses	Regional Commercial adjacent to SVE well field and farther south of SVE treatment plant property; Institutional adjacent to SVE treatment plant property	PD 97-3 – Planned Development adjacent to SVE well field and farther south of the SVE treatment plant property; RR – Railroad adjacent to SVE treatment plant property		
East	Animal shelter, Metrolink railroad tracks	Institutional	M-2 – General Industrial; RR – Railroad farther east		
West	Remainder of Burbank Empire Center	Regional Commercial	PD 97-3 – Planned Development		
Source: City of Burbank, Interactive Citywide Zoning and General Plan Land Use Map, <u>https://experience.arcgis.com/experience/00653afd849744eab0ca3547d66db78a/page/PIM/#data_s=id%3Awidget_78_output_config_1%</u> <u>3A0%2Cid%3AdataSource_3-Core_GEMS2_Landbase_GIS3_4792%3A570</u> . Accessed July 2, 2024.					

Table 1: Project Site and Surrounding Uses



LAND USE DESIGNATIONS AND ZONING

The entire Project Site is designated as Regional Commercial by the City's General Plan, which provides for regional employment and shopping destinations that play an important role in the City's economy by residents of the City and surrounding cities; see **Figure 2-3: General Plan Land Use Map**.

The SVE treatment plant property is zoned as M-2 General Industrial, which is intended for the development of manufacturing process, fabrication and assembly of goods and materials; and the SVE well field, which comprises a portion of the Burbank Empire Center, is zoned as PD 97-3 Planned Development, which permits any use, provided that that use is specifically listed as a permitted use in the approved Development Agreement for the Planned Development; see **Figure 4: Zoning Map**. The existing land use designation and zoning classifications for the Project Site and the surrounding properties are shown in **Table 1**.



SOURCE: City of Burbank, 2024



FIGURE 3 : General Plan Map

SOIL VAPOR EXTRACTION UPGRADE PROJECT



SOURCE: City of Burbank, 2024



FIGURE 4 : Zoning Map

SOIL VAPOR EXTRACTION UPGRADE PROJECT



COMPARISON OF THE ORIGINAL PROJECT AND THE PROPOSED PROJECT

As outlined in the Source Area Removal Plan (SARP), the mothballed legacy SVE treatment plant of the legacy SVE treatment system is no longer capable of meeting the Order requirements and is to be replaced with a smaller, more efficient system capable of handling the lower flowrates and higher VOC concentrations anticipated during source area removal. In particular, the legacy SVE treatment plant is designed to operate at a maximum vapor flow rate of 6,000 SCFM, whereas the proposed SVE treatment system would operate at a maximum vapor flow rate of 500 SCFM. The Proposed Project's changes to the legacy SVE treatment system would involve the replacement of the original SVE treatment plant and its buildings with a new SVE treatment system with wells, piping, blower, process vessels, and smaller stack. According to the SARP, the existing SVE well network cannot adequately target the source areas due to their location and lack of access to the proposed SVE wells, thereby also necessitating the installation of 27 additional SVE wells for source area removal as part of the Proposed Project.

The Proposed Project is a continuation of past remediation at the former Plant B-1 site, focused on reducing concentrations of VOCs within source areas VMP-3 and VMP-5 defined by the LARWQCB and confirmed by the 2017/2018 source area investigation. Although the entire former Plant B-1 site is over 100 acres, the portion of the former Plant B-1 site associated with the remediation of source areas VMP-3 and VMP-5, shown in **Figure 5: Proposed Project Overview**, comprises the Project Site and is the focus of this Supplemental EIR. **Figure 5** superimposes the proposed Project general location over the existing wells and conveyance lines. The overarching design intent of the source area removal for the Proposed Project is to remove VOCs from the VMP-3 and VMP-5 source areas to the extent practicable and control VOC migration. It is also the intent of the source area removal design to utilize the existing SVE piping network at the Project Site to the extent practicable to minimize Project Site disruptions and additional impacts from drilling and construction activities. Existing SVE well vents, vaults, and piping not used during the source area removal SVE would be mothballed and left in place in case their use needs to be revisited, while the existing legacy SVE treatment plant would be demolished and replaced with a more efficient system for source area removal.



SOURCE: Tetra Tech, 2018



FIGURE 5: Proposed Project Overview

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



JUSTIFICATION FOR A SUPPLEMENTAL EIR

Pursuant to Section 15163 of the CEQA Guidelines, a Lead Agency may choose to prepare a Supplemental EIR when conditions that require preparation of a Subsequent EIR are met and "only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation" (Section 15163(a)(1-2)). The purpose of a Supplemental EIR is to provide the additional information necessary to make the previously certified EIR adequate for the project as modified.

It has been several decades since the adoption of the Adopted 1995 EIR; the surrounding environment around the Project Site has since developed and changed, particularly the development of the adjacent Burbank Empire Center. This land use and associated workers and visitors were not evaluated in the Adopted 1995 EIR as sensitive receptors in the Health Risk Assessment and were not included in the analysis of Air Quality, Noise, Hazards and other CEQA topics.

In addition, the Adopted 1995 EIR evaluated the construction impacts of the eventual dismantling and full removal of the legacy SVE treatment plant and SVE well field abandonment. The Adopted 1995 EIR did not evaluate the exact circumstances of the Proposed Project, namely the dismantling/excavation of components of the legacy SVE treatment plant and underground features and the installation of components of a new replacement system. This could potentially trigger construction impacts (e.g., hazards, health risks, transportation, air quality) that were not evaluated or included in the Adopted 1995 EIR. In addition, the lifetime of the Original Project assumed in the Adopted 1995 EIR was expected to be 8.5 years, while the lifetime of legacy SVE treatment plant exceeded this operation time.

Moreover, the Adopted 1995 EIR was certified before the requirement to analyze the potential impacts of the environmental topics of Agriculture and Forestry Resources, Greenhouse Gas Emissions, Energy, and Tribal Cultural Resources was included in the CEQA Guidelines. Furthermore, numerous changes to State and regional regulations such as the South Coast Air Quality Management District (SCAQMD) and LARWQCB requirements have occurred. As such, pursuant to Section 15163 of the CEQA Guidelines, a Supplemental EIR was prepared for the Proposed Project.



PROPOSED PROJECT

The Proposed Project would consist of four primary elements: 1) dismantling and removal of the existing legacy SVE treatment plant and associated structures; 2) installation of a new SVE treatment system at the north corner of the SVE treatment plant property; 3) installation of 27 additional SVE wells beneath the Burbank Empire Center parking lots within the SVE well field; and 4) installation of an underground piping network to connect the new wells to the proposed SVE treatment system. The proposed components would all be designed and constructed in accordance with the SARP and final designs provided to the LARWQCB in 2020.

The owner of the Project Site is considering redevelopment of the SVE treatment plant property (APN 2462-017-020) to include a compatible commercial use to be constructed adjacent to the proposed SVE treatment system. Several potential commercial uses have been presented to the City, but the final option has not been selected as of the commencement of CEQA analysis for this Project (August 2024). The entitlement of any proposed commercial use will undergo its own process with the City, is not part of this Project, and the construction and operation of any commercial use is, therefore, not evaluated in this Supplemental EIR. However, this constitutes a reasonably foreseeable cumulative project and is analyzed in the cumulative impacts analysis for each environmental topic of this Supplemental EIR.

SVE Treatment System

The Proposed Project would construct a new SVE treatment system on the northern portion of the SVE treatment plant property, which would extract soil vapors containing concentrations of VOCs from beneath the SVE well field and treat the vapors prior to release to the atmosphere; see **Figure 6: Proposed SVE Treatment System**.

The proposed SVE treatment system would include aboveground vapor treatment equipment (which would be containerized and/or skid mounted) and its connected piping and controls. The proposed SVE treatment system would be installed on a concrete pad. The pad would be enclosed on all sides by an 8-foot-tall stucco wall and chain link fence with privacy mesh and secured to prevent unauthorized entry. A Knox Box would be installed on the exterior of the enclosure to allow emergency entry by the City of Burbank Fire Department. The system would be landscaped in the form of a grassy area north of the proposed SVE treatment system that would slope towards North Victory Place.

The proposed SVE treatment system would be a smaller, more optimized SVE treatment system than the existing legacy SVE treatment plant and would be capable of handling the lower flowrates and higher VOC concentrations anticipated during remediation of the two recalcitrant source areas. The proposed SVE treatment system would include equipment including inlet moisture separators, a vapor extraction blower, air compressor, liquid storage tanks, vapor-phase granular activated carbon (V-GAC) vessels. The proposed SVE treatment system would also initially include a cryogenic cooling/condensation (C3) treatment unit (SVE Phase I C3 system) for Phase I of Proposed Project operations. After Phase I concludes, the SVE Phase I C3 system would be replaced with a fully-carbon based system for Phase II operations (SVE Phase II Carbon system). See **Table 2: Main Components of the SVE Phase I C3 System and SVE Phase II Carbon System** below for additional information on the main components of the proposed SVE treatment system. The proposed SVE treatment system (Phase I and Phase II) would be designed with a maximum vapor flow of 500 SCFM (roughly 10 percent of the size of the existing legacy SVE treatment



system). See Operation below for more information on Proposed Project phasing.

Additionally, per the original and proposed CUP, if VC is detected in extracted soil vapors during Phase I operations, VC-specific treatment vessels would be added to the subsequent SVE Phase II carbon system if needed to ensure treatment of VC to below City discharge limits; see **Table 2** for additional information regarding treatment of VC during Phase II operations.



SOURCE: ENSAFE, 2024



FIGURE 6: Proposed SVE Treatment System

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



Equipment	Purpose	SVE Phase I C3 System	SVE Phase II Carbon System
C3 treatment unit	Cool the extracted vapors to as low as negative 40 degrees Fahrenheit, which causes any VOCs to condense so they can be separated and removed from the vapor stream	Yes	No
V-GAC vessels	Remove VOCs from the extracted vapors	Two 1,000-pound vessels installed in series	Two 1,000- or 2,000- pound vessels installed in series
Inlet moisture separator	Remove entrained moisture and condensed liquids from the vapors prior to treatment	A primary and secondary inlet moisture separator	One inlet moisture separator
Vapor extraction blower	Extract the soil vapors and route them to the treatment vessels	Yes	Yes
Air compressor	Power certain measurement instruments and controls	Yes	Yes (optional)
Condensate storage tank	Collect and temporarily store the VOC liquids that are condensed and removed during the C3 treatment process, until the liquid can be sampled and transported off- site for recycling or disposal	Condensate storage tank with a minimum capacity of 330 gallons. Tank will be double- walled or double- contained to ensure no leakage from the tank.	No
Surge tank	Collect and temporarily store the water and dissolved-phase VOCs that were removed from the inlet vapor stream by the inlet moisture separators, until the water can be sampled and transported off-site for recycling or disposal	Yes	Yes
Effluent stack	Where treated vapor stream is discharged into the atmosphere	Stack with a height of 15 feet	Stack with a height of 14 to 15 feet

Table 2: Main Components of the SVE Phase I C3 System and SVE Phase II Carbon System



Equipment	Purpose	SVE Phase I C3 System	SVE Phase II Carbon System		
PPZ vessels	Ensure treatment of VC below discharge limits; will be installed if VC is detected in the extracted well vapors during Phase I operations	Νο	Two 1,000- or 2,000 pound vessels installed in series if VC is detected during Phase I operations		
Notes:					
C3 = cryogenic cooling/conde	ensation	PPZ = potassium permanganate zeolite			
VOC = volatile organic compo	bund	VC = vinyl chloride			
V-GAC = vapor-phase granular activated carbon					

SVE Phase I C3 System

A C3 system would be installed to treat the higher initial VOC concentrations in the extracted soil vapors during the initial Phase I of the Proposed Project. A trailer- and skid-mounted rental treatment system would be temporarily installed on the concrete pad, which would include various pieces of equipment, as detailed in **Table 2** above.

SVE Phase II Carbon System

During Phase II of the Proposed Project, a trailer- and/or skid-mounted rental or purchased carbon system would be installed on the concrete pad to treat lower levels of VOCs after Phase I of the Proposed Project, in which the VOC concentrations in the extracted well vapors decrease to a level where the SVE Phase I C3 system above is less economical to operate. The SVE Phase II carbon system would include many of the same main components as the SVE Phase I C3 system, as shown in **Table 2** above.

Additional Components

In addition to the SVE Phase I C3 system and SVE Phase II carbon system, secondary containment berms or trays would be provided around each single-walled vessel or tank that would hold liquids. The Phase I condensate storage tank would have secondary containment built into the tank (via double-walled or double-contained construction) and should not require additional containment. The net capacity of each secondary containment area (the volume of the containment area minus the volume that the tank or vessel occupies) would equal 100 percent of the working volume of the tank or vessel to ensure complete capture of any potential leakage or spillage.

The main electrical supply to the SVE treatment system compound would include a 1,500 kilovolt-amperes (kVA) (480/277-volt secondary voltage) service transformer and a 480/277-volt, 1,600-amp main electrical panel. The transformer would replace the identically sized transformer currently at the SVE treatment plant property of the Project Site (which would be removed during redevelopment of the Project Site) that was used to supply power to the existing legacy SVE treatment plant. The new main electrical panel would be 20 percent smaller than the original panel (1,600 amps versus 2,000 amps), reflecting lower energy demands for the proposed SVE treatment system compared to the existing legacy SVE treatment plant.



SVE Wells and Piping

A total of 27 additional 2-inch diameter SVE wells would be installed to develop a focused SVE network for targeted VOC mass removal in source areas VMP-3 and VMP-5. The proposed wells would be drilled to a maximum depth of 145 feet bgs and would be connected to underground conveyance piping that would convey vapors from the proposed wells to the proposed SVE treatment system; see **Figure 7**: **Proposed SVE Wells and Piping**. All but three of the proposed wells would be within the SVE well field; three of the proposed wells surrounding the VMP-5 source area would be in the City's right-of-way (ROW) for North Victory Place to the north.

The new SVE wells would be connected to the proposed SVE treatment system through an underground piping network comprised of newly installed individual well piping and source area header piping in the immediate vicinity of the new SVE wells, in addition to the existing lo-vac header line and one existing branch line. The new piping would range from 2 to 6 inches in diameter and would be equipped with flow controls (gate valves and ball valves). The remainder of the existing underground network of SVE branch lines and header lines would not be used for the Proposed Project due to their location and lack of access to the proposed SVE wells; however, they would be mothballed and left in place in the event that their use needs to be revisited.

Site Access and Parking

The proposed SVE treatment system would be accessed via the existing driveway off North Victory Place located in the adjacent parcel (APN 2462-017-032) west of the SVE treatment plant property of the Project Site. The Proposed Project would provide two parking places within the Project site, for employees, visitors, and vendors performing periodic monitoring or other activities during operation of the SVE facility. The proposed SVE wells within the SVE well field would be accessed via the existing parking lots of the Burbank Empire Center. As the originally approved CUP 94-13 for the Original Project required five parking spaces, the proposed CUP for the Proposed Project would include a reduction of parking spaces as part of the CUP amendment.



SOURCE: ENSAFE, 2024



FIGURE 7: Proposed SVE Wells and Piping

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



Construction

Schedule, Workforce, and Project Site Access

Project construction is anticipated to be conducted from spring of 2025 to late spring of 2026 (assumed to be up to 15 months). Project construction activities would consist of demolition of the existing legacy SVE treatment plant, Project Site grading, installation of new electrical infrastructure, and construction of the proposed SVE treatment system and associated wells and piping. For the purposes of the environmental analysis, it is assumed that construction of the proposed SVE Phase I C3 system would not overlap with construction of the proposed SVE wells and piping. Demolition of the existing legacy SVE treatment plant would occur first, followed sequentially by the construction of the proposed SVE Phase I C3 system, installation of the proposed SVE wells and piping, and installation of the SVE Phase II carbon system. The duration of demolition of the existing legacy SVE treatment plant would occur over approximately 3 months, construction for the proposed SVE Phase I C3 system would occur over approximately 6 months, and construction of the proposed SVE wells and piping would occur over approximately 6 months. Construction for the SVE Phase II carbon system is to be determined and would occur after SVE Phase I C3 System operations have been completed. On-site construction activities would include a workforce of approximately six individuals. Construction would occur consistent with City noise policies, as presented in Burbank Municipal Code (BMC) Section 9-1-1-105.10. Specifically, construction of the Proposed Project would occur Monday through Friday from 7:00 a.m. to 7:00 p.m. and Saturday from 8:00 a.m. to 5:00 p.m. During construction of the proposed SVE treatment system, short-term, temporary closures of the lanes adjacent to North Victory Place and Empire Avenue may be required for construction staging.

Demolition

Demolition activities would include the dismantling and removal of the existing legacy SVE treatment equipment; the demolition of the buildings and associated structures that house the existing legacy SVE equipment; the removal and/or abandonment-in-place of underground utilities in the vicinity of the existing buildings and a portion of the underground SVE piping that connect the extraction wells to the existing legacy SVE treatment plant; and the removal of three 150-gallon underground storage tanks (USTs) that had been installed to collect condensed water and liquids from the existing piping to the existing legacy SVE treatment plant; see **Figure 8: Demolition Plan**.



SOURCE: ENSAFE, 2024

N.T.S.

FIGURE 8: Demolition Plan

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



All demolition activities would be conducted in accordance with the SARP and final designs as well as a Demolition Plan for the demolition of the legacy SVE treatment plant and removal of the USTs specifically that was also approved by the LARWQCB in 2019.

Demolition activities would generate approximately 350 tons of asphalt; 2,295 tons of concrete; 100 tons of pipelines (metal scrape); and 5 tons of carbon. Demolition debris would be transported off-site for proper disposal; see *Solid and Nonhazardous Waste* below for additional information. No demolition materials would be crushed and used on-site.

The Project Site would be rough regraded after the buildings and foundations are removed using up to 2,000 tons of surrounding soils and import fill. The existing retaining wall, chain link fence, and City of Burbank Water and Power electric transformer area would remain on the SVE treatment system property of the Project Site. In addition, four of the original 11 underground SVE branch lines and their associated extraction wells, all installed beneath the Burbank Empire Center parking lots, would be abandoned in place by first disconnecting the branch lines from the main underground header piping from within the existing underground access vaults, and then injecting grout into each branch line. No ground surface would be disturbed during this operation.

Site Preparation

The proposed SVE treatment system would initially be constructed with the C3 system for Phase I operations. The proposed construction laydown/staging areas would be identified by the contractor of the Proposed Project. Construction of the proposed SVE treatment system would require the excavation of approximately 411 cubic yards (CY) of soil.

Drilling and trenching associated with the proposed SVE wells and piping would be required within the parking lots on the northeastern portion of the Burbank Empire Center. Construction activities associated with drilling and trenching within the SVE well field would not encroach on any existing buildings of the Burbank Empire Center.

As mentioned above under *SVE Wells and Piping*, the 27 proposed SVE wells would be drilled to a maximum depth of 145 feet bgs around source areas VMP-3 and VMP-5 and would be connected to underground conveyance piping that would convey vapors from the proposed SVE wells to the proposed SVE treatment system. All of the proposed SVE wells (with the exception of the three proposed wells in the City's ROW) would be located in existing planters of the portion of the Burbank Empire Center parking lots within the SVE well field. Underground piping that would convey vapors from the proposed SVE wells in the SVE well field to the proposed SVE treatment system on the SVE treatment plant property is largely already in place; therefore, only new piping in the immediate vicinity of the proposed SVE wells would be required. Accordingly, installation of the proposed SVE wells and piping would occur only on two parcels within the SVE well field, at and near the source areas: 1501 North Victory Place (APN 2462-017-30) and 1800 West Empire Avenue (APN 2462-017-18). The other two parcels of the SVE well field, generally located at 1301 North Victory Place (APNs 2462-017-29, -032), contain existing underground piping that would remain in place and would be used for operations of the Proposed Project. As such, these two parcels would not include any construction activities.

New underground conveyance piping would be buried at a sufficient depth to withstand vehicle traffic loads. Approximately 1,230 linear feet of trenching for the new piping would be required at an average



depth of 3 feet bgs and a maximum depth of 5 feet bgs (as a trench may include more than one conveyance pipe). Excavation of the tie-in piping to the VMP-3 and VMP-5 source areas would reach a depth of approximately 16 feet bgs and 6 feet bgs, respectively. Approximately 30 percent of the excavated soil from the trenches would be reused as backfill material; the remainder would be disposed off-site. The piping trenches would be backfilled and compacted to geotechnical standards appropriate for the parking area. All surface cover removed for trenching or well installation would be replaced with new asphalt or concrete, as appropriate, to match the surrounding surface.

Installation of the proposed SVE wells and new piping would generate approximately 169 CY and 42 CY of soil export and import, respectively. The 42 CY of soil import would include approximately 19 CY for well construction and 23 CY of sub-base for the piping trenches. The estimated volume of soil drilling cuttings to be generated is 36 CY, which is anticipated to be transported off-site in four 10-CY soil bins. Approximately 4 CY of sand pack and 15 CY of bentonite/cement seal, which would be mixed on-site, would be required to complete all the wells.

Solid and Nonhazardous Waste

During demolition activities, there would be a temporary period when demolition debris would be transported off-site for proper disposal. Demolition debris to be transported off-site would consist of crushed or broken concrete/masonry material, cut lengths of piping, and soil. The three USTs would also be transported for proper off-site disposal.

During drilling activities within the SVE well field, soil cuttings would be deposited into a soil bin, analyzed, and transported off-site to a licensed receiving facility permitted to accept such material. Shallow soil that is excavated during trenching for piping installation would be reused to backfill the trench to the extent practicable; only if the soil is not suitable from a geotechnical standpoint would the soil be transported off-site to a landfill or alternate receiving facility for use as daily cover or a similar use. Any asphalt or concrete surface cover removed during piping installation would be transported off-site to a landfill or recycling facility.

Solid, nonhazardous demolition debris would be disposed at SA Recycling Center in the City of South Gate approximately 30 miles south of the Project Site for scrap debris, Kettleman Hills Facility in unincorporated Kings County approximately 200 miles northwest of the Project Site for spent carbon, Ramco Sun Valley in the City of Sun Valley approximately 5 miles northwest for concrete debris, and Waste Management (WM) Downtown Diversion approximately 16 miles southwest for other types of demolition debris.

Hazardous Materials and Waste

As mentioned above under *Demolition*, during demolition activities, the Proposed Project would require the removal of three 150-gallon USTs from the SVE treatment plant property. Removal of the USTs would comply with the UST removal procedures required by the City of Burbank Fire Department. The removal site would be backfilled with approximately 120 tons of a suitable fill and rough graded upon completion of demolition activities. Any additional grading required for the new SVE treatment system location would be properly permitted through the City.

Hazardous wastes would also be generated during installation of the proposed SVE wells and piping. Particularly, well drilling may require the removal of VOC-containing soil. There may also be a limited amount of liquids in the SVE piping to be removed during demolition activities. Contaminated soils and



liquids from the SVE piping would be transported to a recycling or disposal facility licensed to accept such soils and liquids, respectively.

Operation

Process Flow Description

The operational lifetime of the Proposed Project is estimated to be 8.5 years. The proposed SVE treatment system would process air at a rate of 500 SCFM for the removal of VOCs. During Phase I of Proposed Project operations, the SVE C3 system would be utilized to treat VOC-laden vapors. Sequential steps in the C3 process involve the following:

- 1. VOC-laden vapors would be extracted from the proposed SVE wells and routed through the conveyance pipelines to the air compressor of the SVE C3 system through the use of the vapor extraction blower.
- 2. Primary and secondary inlet moisture separators would remove entrained moisture and condensed liquids from the vapors prior to treatment.
- 3. The vapors would be compressed to a pressure of approximately 150 pounds per square inch (psi).
- 4. Water vapor would be removed from the process stream through air-to-air heat exchangers in the C3 treatment unit that would cool the vapor stream to approximately 40 degrees Fahrenheit.
- 5. The vapor stream would be further cooled to negative 40 degrees Fahrenheit in refrigerated heat exchangers in the C3 treatment unit, where the majority of chemical constituents would be condensed and separated from the vapor stream.
- 6. The vapor stream would be sent to the regenerative adsorber in the C3 treatment unit, which removes any residual chemical components and water vapor and directs it back to the inlet stream.
- 7. The system effluent vapor stream would be further refined through V-GAC filtration in accordance with SCAQMD and local regulations prior to discharge to the atmosphere through a 15-foot-tall effluent stack.

A simplified process flow diagram for the SVE C3 system during Phase I operations is shown in Figure 9: SVE Phase I C3 System Process Flow Diagram.



FIGURE 9: SVE Phase I C3 System Process Flow Diagram

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



Once VOC concentrations decline to a level in which is it less economical to operate the SVE Phase I C3 system (approximately 3 to 12 months), the SVE C3 system would be removed and replaced with a SVE carbon system, for Phase II treatment. Sequential steps in the carbon-based process include the following:

- 1. VOC-laden vapors would be extracted from the proposed SVE wells and routed through the conveyance pipelines to the air compressor of the C3 system through the use of the vapor extraction blower.
- 2. An inlet moisture separator would remove entrained moisture and condensed liquids from the vapors prior to treatment.
- 3. Vapors would be routed through two V-GAC vessels in series, which would remove the VOCs from the vapor stream as required by SCAQMD.
- 4. Vapors would be polished through two optional PPZ vessels in series to remove VC, if present.
- 5. Treated vapors would be discharged through an effluent stack approximately 14 to 15 feet tall.

A simplified process flow diagram for the SVE carbon system during Phase II operations is shown in **Figure 10: SVE Phase II Carbon System Process Flow Diagram.**

Monitoring would be conducted to ensure VOC concentrations in effluent are within SCAQMD and City discharge limits. Phase II would conclude once LARWQCB has deemed remediation efforts to be complete. In the case that VOC concentrations exceed the SCAQMD's or City discharge limits the Monitoring would be conducted to ensure VOC concentrations in effluent are within SCAQMD and City discharge limits, the SVE carbon system would be shut down, and the spent carbon would be replaced with fresh carbon, and/or additional carbon would be added to the system; see additional information regarding the replacement of spent carbon in *Operations and Maintenance Activities* below.

Condensed VOCs would be recovered as liquid that would be disposed off-site or recycled. See *Hazardous Materials and Waste* below for additional information regarding waste disposal during Proposed Project operations.



SOURCE: ENSAFE, 2024

FIGURE 10: SVE Phase II Carbon System Process Flow Diagram

SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT



Operations and Maintenance Activities

The proposed SVE treatment system would be designed to operate autonomously 24 hours per day, 7 days per week, without an operator on-site. Proposed Project operations would not have continuous staffing or work shifts. Operation and maintenance (O&M) visits would be made at least one day per week to collect operational data such as flow rates, temperatures, and pressures, and to monitor the influent and effluent VOC concentrations at the proposed SVE treatment system. Operators would also occasionally access the proposed SVE wells to collect similar measurements, although this effort would decrease substantially after the first month of Proposed Project operations. Data collection and monitoring would be conducted to optimize the performance of the proposed SVE treatment system and to demonstrate compliance with the SCAQMD Permit to Construct/Permit to Operate (PTC/PTO) and the proposed CUP. Additionally, vapor samples would be collected from the proposed SVE treatment system influent and effluent during the first week of Proposed Project operations and monthly thereafter, as per SCAQMD PTC/PTO requirements. See *Emissions Monitoring* below for additional information pertaining to data collection, monitoring, and calculations during Proposed Project operations.

In addition to normal O&M visits, the operator would be on-site during special treatment system operations, such as changing out carbon that is spent (a task lasting several hours), to restart the system after a shutdown (a task lasting an hour to several hours), or to perform unscheduled maintenance (a task typically lasting an hour to half a day).

Truck services would be provided on an as-needed basis for the following maintenance tasks during Proposed Project operations:

- Change-out of spent carbon: When the V-GAC is spent or loses its ability to perform its function at the level that it should, the V-GAC vessel would be taken out of service until new carbon can be delivered. The spent carbon would then be removed from the vessel and replaced with the new carbon, and/or additional carbon would be added to the vessel. This operation generally involves a vacuum truck or small trailered vacuum unit and typically takes a few hours. The required frequency of this task would vary over time, depending on the VOC concentrations in the system influent vapors and the treatment equipment. It is currently anticipated that this task would be required approximately every six months under Phase I operation and every 2 to 4 months under Phase II operation.
- Change-out of VC: VC has not been detected in well vapors at the Project Site to date; therefore, the need for PPZ vessels is not anticipated. However, if VC is detected in the well vapors during Proposed Project operations and necessitates the installation of PPZ vessels, spent PPZ would be managed in the same manner as spent carbon.
- Removal of liquids condensed from the vapor stream: A vacuum truck would be required to periodically remove liquids that have accumulated in the surge tank and condensate tank. The frequency of this need depends on the VOC concentration and how much moisture is entrained in the system influent vapors. It is currently anticipated that this task would initially be performed approximately once per week and would decrease over time.

Emissions Control/Shutdown Procedure

The proposed SVE treatment system would be controlled and monitored by programmable logic



controllers (PLCs). The PLCs would monitor and record data and manage the automated system immediately shutdowns in the case of system component malfunctions, or if emissions exceed the VOC discharge limit. The PLCs would automatically alter the facility configuration and throughput to assure the VOC limit is not exceeded. In the case that operational issues occur that could result in a spill (i.e., high liquid level in the influent knockout separator) or equipment damage (i.e., blower belt breakers), the PLCs would be programmed to immediately shut down the proposed SVE treatment system, alarm the operator, and/or autodial a notification to qualified alarm response personnel. The system would not start up until the operator manually reviews all parameters to ensure conformance with all system requirements.

Additionally, an Emergency Response Plan detailing spill response and evacuation procedures would be included as part of or in addition to the Proposed Project's Health and Safety Plan. A copy of the Emergency Response Plan and Health and Safety Plan would be provided on site, in a protected area within the proposed SVE treatment system at all times.

Emissions Monitoring

Emissions from the proposed SVE treatment system would be monitored to ensure that system operations are consistent with SCAQMD and City discharge limits. VOC concentrations following treatment would be measured on a continuous basis using a continuous emission monitor (CEM). Emissions would be calculated from these concentration readings and an estimate of flow out of the stacks of the SVE Phase I C3 system and SVE Phase II carbon system.

In addition to controlling the total VOC emissions from the proposed SVE treatment system, Burbank Lockheed would also determine the concentrations of PCE, TCE, VC, and CCl₄ in the emissions from the proposed SVE treatment system. These chemicals would be used as indicators of a potential change in excess cancer risk should there be a change in the concentration level of individual chemicals in the mix of chemicals.

To ensure that operation of the Proposed Project does not result in any significant health effects, the same conditions for the originally approved CUP 94-13 would also be imposed for the Proposed Project, as shown below:

- VOC concentrations shall be limited to 9.8 pounds per day as a monthly average.
- VC concentrations shall be limited to 0.14 pounds per day as a monthly average.
- The measured concentrations of PCE, TCE, VC, and CCl4 shall be used to calculate the excess cancer risk and ensure that it remains below one in one million assuming that emissions remain at this level for the entire life of the Proposed Project, which is 8.5 years.

Data collection and monitoring would be conducted to optimize the performance of the proposed SVE treatment system and to demonstrate compliance with the SCAQMD PTC/PTO and the proposed CUP. Vapor samples would be collected from the proposed SVE treatment system influent and effluent during the first week of operation and monthly thereafter, as per SCQMD PTC/PTO requirements.



Each vapor sample would be collected, preserved, transported, and analyzed per the United States Environmental Protection Agency (U.S. EPA) methods and SCAQMD requirements applicable to the type of sample and compounds to be analyzed

In the event that the calculated cancer risk exceeds one in one million based on the analysis of any one monthly or quarterly sample, system adjustments would be made by manually adjusting extraction flow rates and/or influent dilution air to decrease VOC emissions to meet the City's discharge limits. In the case that VOC concentrations exceed the City's discharge limits, additional treatment vessels may be added to target the exceeded VOC. Effluent samples would be collected and analyzed within three days following the system change. If compliance with the discharge limits is met, the normal sampling schedule would resume. Otherwise, additional system changes and weekly samples would be taken for one month to ensure compliance. If the operational adjustments cause the expected Proposed Project life to be extended, the life used for risk evaluations would be increased accordingly.

Additionally, if the VC limit of 0.14 pounds per day is exceeded in any month, the emissions in future months must be reduced so that the monthly average for a three-month period which includes the month of violation meets the emission limit.

Sample results and emissions calculations would be sent to the City and LARWQCB for review.

Hazardous Materials and Waste

No chemicals are required for operation of the proposed SVE treatment system other than standard lubricants and grease to keep machinery parts properly lubricated. However, hazardous wastes or products would be generated during operation of the proposed SVE treatment system, including VOC-containing aqueous wastes or liquids that would be removed from the vapor stream and spent carbon generated during treatment system operation. The surge tank and condensate tank of the proposed SVE treatment system would temporarily store VOC liquids that are removed from the vapor stream during Proposed Project operations until the hazardous waste is transported off-site for proper disposal. All liquid and solid wastes and products generated during system installation and operation would be sampled, analyzed at an independent California Environmental Laboratory Accreditation Program (ELAP)-certified environmental laboratory, and properly manifested for transport off-site. Spent carbon would be transported to either a licensed carbon regeneration facility or a licensed disposal facility depending on VOC concentrations in the carbon, based on the laboratory analytical results.

The liquids removed from the vapor stream may or may not be classified as hazardous; nonetheless, appropriate chemical data sheets (CDSs), formerly referred to as material safety data sheets (MSDSs), for potential chemicals present in the liquids would be supplied to the City of Burbank Fire Department prior to initiating system startup. CDSs would also be supplied for the V-GAC vessels and consumables such as lubricants, grease, and any other material with a CDS.

As discussed above under *Operations and Maintenance Activities,* it is anticipated that removal of accumulated liquids would be performed using a vacuum truck at a frequency of approximately once per week to once per month, and that change-out of spent carbon would be performed using a vacuum truck at an anticipated frequency of approximately every six months under Phase I operations and every 2 to 4 months under Phase II operations. The estimated volume of liquids per load is 200 to 400 gallons, and the estimated pounds of spent carbon per load is 1,000 to 2,000 pounds. The off-site transport of such



materials would be scheduled between 9 a.m. and 4 p.m. Additionally, in the case that VC is detected in well vapors, the transportation and disposal of spent PPZ would be managed in the same manner as spent carbon.

Landfill-type solid waste would not be generated as a result of treatment system operation, although spent carbon (and PPZ, although not anticipated) would be transported off-site to a recycling or disposal facility.

Decommissioning

When soil cleanup levels are met, the Proposed Project would be shut down and decommissioned pursuant to applicable regulations in effect at that time. The two major events that would occur during the final shutdown would be 1) the dismantling and removal of the proposed SVE treatment system from the SVE treatment plant property, and 2) the sealing of the proposed SVE wells. Termination and abandonment conditions shall be in conformance with requirements approved by the LARWQCB.

Dismantling and Removal of the Proposed SVE Treatment System

Once it has been determined by the LARWQCB that the proposed SVE treatment system has accomplished its VOC cleanup goal, the proposed SVE treatment system would be dismantled and removed from the SVE treatment plant property. As part of the dismantling and removal process, valve vaults would be eliminated, and open pipes would be sealed by grouting and/or other suitable methods.

Well Abandonment

Once it has been determined by the LARWQCB that the proposed SVE treatment system has accomplished its VOC cleanup goal, the proposed SVE wells would be sealed shut with pressure grouting, which would be accomplished through the valve vaults. A specified cement bentonite slurry would be pumped through the underground conveyance pipelines and down into the wells, sealing the well screens and filling the pipes which would be abandoned in place. Abandonment of the wells would be completed in accordance with applicable regulatory requirements.

PROJECT OBJECTIVES

Given that a majority of the originally impacted area of affected soil has been remediated by the Original Project and that the Proposed Project would operate with technology with a smaller footprint on the remaining contaminated source areas, minor changes to the objectives of the Adopted 1995 EIR are proposed below:

- Restore the affected soil within the VMP-3 and VMP-5 source areas such that further remedial action and monitoring would no longer be necessary.
- Eliminate migration of soil contaminants to the groundwater aquifer.
- Use the best available treatment technology that has an established record of successful performance (i.e., not experimental technology).
- Meet the needs of the South Coast Air Quality Management District (SCAQMD) for its permitting action on the SVE.



APPROVALS

The City is the Lead Agency for the Proposed Project, as it is the agency with primary authority over the Proposed Project's discretionary approvals. Several other agencies, identified as responsible and trustee agencies, will also use the Supplemental EIR for their consideration of approvals or permits under their respective authorities.

Implementation of the Proposed Project would likely include, but not all, the same permits and approvals identified in the EIR for the Original Project. Notably, the proposed SVE treatment system would emit treated vapors into the atmosphere and therefore requires a CUP from the City. Because the proposed SVE treatment is a smaller, optimized version of the existing legacy SVE treatment system that was already permitted by the City through CUP 94-13 for the Original Project, the Proposed Project is seeking the approval of a new CUP that would amend CUP 94-13 to revise pertinent treatment equipment information and several operating parameters and conditions included in the original CUP to reflect the optimized system's design and operation.

A list of all the discretionary permits that could be required from the lead agency, trustee agencies, and responsible agencies for the Proposed Project are identified in **Table 3: Matrix of Potential Approvals Required**.

		Lead/Trustee/Responsible Agency	
Permit/Action Required	Approving Agency	Designation	
Supplemental Environmental Impact	City	Lead Agency	
Report Certification	City		
Conditional Use Permit	City	Lead Agency	
SVE treatment system design approval	LARWQCB	Responsible Agency	
Installation of SVE wells greater than	Los Angeles County Public Health		
10 feet in depth, and if drilling	Department Environmental Health	Responsible Agency	
activities encounter the saturated	Division	Responsible Agency	
zone	Bivision		
Grading, Building, and	City	Lead Agency	
Encroachment Permit(s)	City	Lead Agency	
Permit to Construct/Permit to	SCAONAD	Responsible Agency	
Operate	SCAQIVID		
Construction and operation of	City	Lead Agency	
product liquid storage tank	City		

Table 3: Matrix of Potential Approvals Required



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