Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

April 03, 2025

Joseph Onyebuchi
Associate Planner
City of Burbank
150 North Third Street
P.O. Box 6459
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RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SOIL VAPOR EXTRACTION SYSTEM UPGRADE PROJECT DATED MARCH 05, 2025 STATE CLEARINGHOUSE NUMBER 1995061010

Dear Joseph Onyebuchi,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Soil Vapor Extraction System Upgrade Project (Project). The City of Burbank intends to prepare a Supplemental Environmental Impact Report (SEIR) to address the source area removal action. The action 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 Plant B-1. Per Cleanup and Abatement Order No. 87-161 by the Los Angeles Regional Water Quality Control Board (LARWQCB), the action focuses on reducing concentrations of volatile organic compounds within two source areas,. 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 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 Source Area Removal Plan. DTSC recommends and requests consideration of the following comments:

1. The SVE Treatment Plant portion of the Project is located on a formerly used defense site, AFP #14. Information, if available, can be requested of the U.S. Army Corps of Engineers through a Freedom of Information Act request.
2. While the land proposed for redevelopment has been investigated and remediated with regulatory oversight, there remains the potential for contamination to be discovered during earthmoving activities. Please ensure that a soils management plan is developed to outline waste handling procedures, disposal and handling of any contamination found, and criteria for backfilling with clean imported fill material. DTSC understands Lockheed Martin Plant B-1 is under LARWQCB oversight and defers to the LARWQCB for specific comments on the SVE system upgrade.
3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's PEA Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

4. The NOP of a DEIR mentions the removal of three 150-gallon underground storage tanks (USTs) that had been installed to collect condensed water and liquids from the legacy SVE treatment plant. In the proposed SEIR, please explain if any sampling is planned once the USTs are removed in addition to any planned sampling analysis methods.

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the Soil Vapor Extraction System Upgrade Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via the CEQA Unit Inbox for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis
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cc: (via email)

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