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State Water Resources Control Board  
Division of Drinking Water

April 28, 2021

Governor's Office of Planning & Research

**Apr 28 2021**

Mr. Michael Thompson  
Manager Water Engineering/Planning  
City of Burbank  
164 W. Magnolia Blvd  
Burbank, CA 91503

**STATE CLEARINGHOUSE**

**SCH NO. 2021040181: CEQA COMMENTS FOR THE BURBANK OPERABLE UNIT (BOU) REMEDIATION SYSTEM UPGRADES PROJECT, BOU – NHOU DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

Dear Mr. Thompson:

Thank you for the opportunity to review and comment on the Mitigated Negative Declaration (MND) for the project titled *Burbank Operable Unit (BOU) Remediation System Upgrades Project* (Project). The State Water Resources Control Board, Division of Drinking Water (Division) understands that in addition to the MND, the City of Burbank prepared an Initial Study (IS) for the Project. The Division is providing the following comments on the MND and the IS for the Project:

1. Throughout the MND/IS, all references to (GAC) or LPGAC are as granular “**active**” carbon instead of granular “**activated**” carbon.
2. Whenever conveyances/piping for non-potable water (e.g., sewer lines, recycled water piping, others) are used, the Project shall comply with the State criteria for the separation of water mains and conveyances/piping for other (non-potable) fluids, Chapter 16 - California Waterworks Standards, Title 22, CCR.
3. On page 2-5 of the IS, it is indicated that the existing NHE-8R would be abandoned in place, consistent with standards developed by the Department of Water Resources (DWR) pursuant to Section 13800 of the California Water Code for the abandonment or destruction of groundwater wells. However, there is no such indication about plans to properly abandon the existing NHE-7R. Instead, it states that the existing NHE-7R well will be decommissioned. All existing wells need to be properly abandoned and destroyed per DWR California Well Standards, bulletin 74-81.

4. There is currently a reference in the document to two new LPGAC vessels to be installed as backup. Please clearly explain that the expectation is that the final treatment configuration for the BOU Plant upgrades is not currently determined and will only be determined later when all sections of the Division's 97-005 Report, as part of the 97-005 review process, are completed, reviewed, and approved by the Division.

If you have any questions, please contact David McElheny at (818) 551-2050 or me at (818) 551-2022.

Sincerely,



Dmitriy Ginzburg, P.E.  
Hollywood District Engineer  
Division of Drinking Water

cc: Office of Planning and Research  
State Clearinghouse