

MAY 19 2022

Planning & Building Services

Hello,

I represent the Department of Toxic Substances Control reviewing the Initial Study (IS) for the U_2017-0036 Manchester AT&T Tower project.

The project proposes to install an emergency generator fueled by a diesel tank. The IS discusses that this may be subject to a Hazardous Materials Management Plan (HMMP), which identifies actions if a spill occurs. The IS does not discuss procedures to prevent a spill from occurring. The IS should provide more details to explain how spills will be prevented (e.g. structure of the tank, double containment, best management practices).

The IS text does not discuss hazardous materials used during project construction. Typically during construction, hazardous materials such as fuels and oils would be used. However, these materials would be used on a temporary basis, in limited quantities and should follow applicable regulations. Please discuss this in the IS.

The IS states that the project location is on a former State Water Resources Control Board (SWRCB) site that has been remediated and closed (the AT&T Communications site). The IS clarifies that the specific area for the proposed tank is in a different location than the remediated area for the AT&T Communications site. It would be helpful to also discuss the current status of the SWRCB site and how this may affect work at the project site (e.g. no further action, land use restrictions, health and safety requirements).

Please conduct a full review of the Cortese List (list of sites under Government Code 65962.5) for question IX)d). The IS incorrectly states that the Cortese List is for DTSC/Envirostor sites. Please refer to the following link for a list of Cortese List requirements that should be reviewed as part of the CEQA process (<https://calepa.ca.gov/sitecleanup/corteselist/>). For DTSC, Cortese List sites are sites where DTSC has issued an order for cleanup, but this is just the DTSC component of the Cortese List. The AT&T Communications site is included on the Cortese List.

Please feel free to reach out if you have any questions or concerns.

Sincerely,



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