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B. DEPARTMENT OF TOXIC SUBSTANCES CONTROL

- B-1. The "Interim Guidance for Evaluating Lead-Based Paint and Asbestos-Containing Materials at Proposed School Sites" is a guide for the assessment of buildings on property previously or presently occupied by structures held by an entity other than a college or school district. This guideline comes into play when a college or school district takes ownership of a building that was used as commercial and/or residential purposes (e.g. a Silicon Valley industrial site). In the case of the CCSF Main Campus, the buildings at the site have always been part of City College. Therefore, this guidance is not applicable. Extensive lead based paint and asbestos studies have been previously performed at the site and were discussed in the Phase I Environmental Site Assessment for the CCSF Main Campus.
- B-2. The Draft EIR identifies the potential to encounter contaminated soil and/or groundwater during site grading and construction as a significant impact. (Draft EIR, p. 4.8-14) If evidence of contamination is encountered during excavation, the Draft EIR requires that appropriate analysis and remediation be undertaken. (Draft EIR, p. 4.8-14) The active underground storage tank (near the north end of Cloud Hall) and the potential old crude oil tank (in front of Science Hall near Phelan Avenue) are not in areas that would house new school uses or be affected by the proposed Master Plan. The closed tank east of the North Gym is located beneath Bungalows 602-623D, which would be removed for construction of the parking structure. The mitigation measures identified in the EIR would apply to this tank. Any potential issues with respect to underground storage tanks on the Main Campus would be addressed by CCSF in consultation with DTSC.
- B-3. This comment is noted for the record.
- B-4. The Phase I Environmental Site Assessment for the CCSF Main Campus was completed in accordance with ASTM-E-1527-00. The "Phase I Environmental Site Assessment Advisory: School Property Evaluations" recommended by the DTSC is also based on ASTM-E-1527-00. In addition, it requests a discussion on the potential sources of specific types of hazardous material releases and naturally occurring hazardous substances (e.g. agricultural use, mine sites, prior residential usage, former government use/ownership, asbestos, lead based paint, petroleum,) as well as the inclusion of additional documentation for the Phase I report. Because the structures on site have always been part of City College and the elements not covered in the Phase I ESA conducted for CCSF (e.g. mine sites, former residential usage, former government use/ownership) are not applicable to the site, the results of the Phase I would have been the same if the Phase I ESA Advisory for School Property had been performed. The documentation that DTSC recommends to be included in the Phase I is on file at CCSF and is available upon request.
- B-5. These comments are noted for the record.

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