

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-SPPE-03
<b>Project Title:</b>	Sequoia Data Center
<b>TN #:</b>	232259
<b>Document Title:</b>	Department of Toxic Substances Control Comments - on Initial Study and Proposed Mitigated Negative Declaration
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Department of Toxic Substances Control
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	2/28/2020 1:55:02 PM
<b>Docketed Date:</b>	2/28/2020

*Comment Received From: Department of Toxic Substances Control  
Submitted On: 2/28/2020  
Docket Number: 19-SPPE-03*

**on Initial Study and Proposed Mitigated Negative Declaration**

*Additional submitted attachment is included below.*

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**From:** Roman, Isabella@DTSC <Isabella.Roman@dtsc.ca.gov>  
**Sent:** Friday, February 28, 2020 12:54 PM  
**To:** Payne, Leonidas@Energy <leonidas.payne@energy.ca.gov>  
**Subject:** FW: Sequoia Data Center IS/MND Comment

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Hello,

I represent the Department of Toxic Substances Control reviewing the Initial Study and Proposed Mitigated Negative Declaration for the Sequoia Data Center project. My official comments are described below.

The text discusses past land uses, but further clarification needs to be added. A paper mill is said to have operated on the property since the 1950s until 2017. It is not discussed what potential hazardous materials could result from operation of a paper mill facility. Please discuss what hazardous materials-related impacts this facility could have had on the project site.

The text discusses twelve underground storage tanks (USTs) that were removed with regulatory oversight. It is said that these sites were closed “based on the SCWVD’s conclusion that the remaining contamination did not represent a significant threat to groundwater due to the stable or decreasing trends and distribution of petroleum hydrocarbon concentrations in groundwater.” The decision for case closure seems to have been based off of impacts to groundwater. It’s unclear whether a potential soil impact existed, remains, or was not evaluated. If a soil source still exists, this could impact construction workers. If the soil has been evaluated and is not a concern, then further clarification should be added to the text.

Similarly, the Limited Subsurface Investigation collected groundwater and soil vapor samples, but no soil samples. Construction workers and surrounding receptors could be exposed to contaminated soil, if left unevaluated. It is said throughout the text that there are residual concentrations of chemicals of concern (COCs) present due to past land uses. It is unclear where this residual assessment comes from, as it seems that there have been no soil samples collected. This may be an assumption based on groundwater and soil vapor samples, but the potential for contamination in

soil should not be eliminated as a concern without properly evaluating the potential for that pathway to be present. I would recommend conducting a Phase 2 Environmental Site Assessment (ESA) or other environmental sampling (specifically for soil) to eliminate any concerns regarding construction worker/community safety, especially considering past land uses that likely have contributed to contamination at the site.

The Mitigation Measure HAZ-1 is inadequate to address potential contamination at the site. This Mitigation Measure explains that “if contaminated soils from agricultural or industrial use are unexpectedly encountered during any construction activities, work in the area shall be temporarily halted...” There is no information describing how the soil will be determined to be contaminated. By the time the soil is contaminated to levels high enough to be detected by odor or visually, the action levels could already be well exceeded. Visual and odor signals are inadequate to prevent exposure to contamination, especially in an area known to have past environmental issues and past land uses that likely contributed to soil contamination. Soil exposure would seem to be the main concern for construction worker and public safety and should be fully characterized and addressed prior to construction work.

There are also a few specific areas that need further clarification. These are detailed below:

- **On page 184 it is said that detections were below California Environmental Protection Agency (CalEPA) screening criteria. Please specify which CalEPA screening criteria you are referring to.**
- **Please provide more information regarding the Phase 1 ESA, Limited Subsurface Investigation and past UST closure activities. If not, please add the Phase 1 ESA and Limited Subsurface Investigation to the appendix and incorporate these documents by reference.**

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

Sincerely,

Isabella Roman  
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