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# LIST OF ATTACHMENTS

Attachment 4.8–A: EDR DataMap Corridor Study Attachment 4.8–B: Construction Fire Prevention Plan

# 4.8 HAZARDS AND HAZARDOUS MATERIALS

Would the Proposed Project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?			<b>✓</b>	
e) If located within an airport land use plan or within two miles of a public airport or public use airport for which such a plan has not been adopted, result in a safety hazard for people residing or working in the project area?			<b>√</b>	
f) If located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				✓
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓

Would the Proposed Project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fire, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			✓	

#### 4.8.0 Introduction

This section discusses potential hazards to public health and safety associated with construction, operation, and maintenance of the proposed San Diego Gas & Electric Company (SDG&E) Tie Line (TL) 649 Wood-to-Steel Replacement Project (Proposed Project). This analysis addresses existing hazardous materials, wildland fire potential, hazards to public and worker health and safety, and physical hazards. As described in this section, potential Proposed Project impacts associated with hazards and hazardous materials will be less than significant.

# 4.8.1 Methodology

Analysis of existing hazards and hazardous materials involved a review of the Environmental Data Resources, Inc. (EDR) DataMap Corridor Study prepared for the Proposed Project; the County of San Diego General Plan; the Otay Mesa Community Plan; the City of San Diego General Plan; the City of Chula Vista General Plan; California Department of Forestry and Fire Protection (CAL FIRE) data; emergency evacuation and response plans for the County of San Diego, the City of San Diego, and the City of Chula Vista; and the Office of Emergency Services (OES) websites for the County of San Diego, the City of San Diego, and the City of Chula Vista. The EDR DataMap Corridor Study is included as Attachment 4.8–A: EDR DataMap Corridor Study.

#### **Records Review**

The EDR DataMap Corridor Study included a review of federal, state, local, and other hazardous materials databases to determine areas where contamination might be encountered during construction. The database search covered areas located within 0.125 mile of the Proposed Project alignment and identified the use, generation, storage, and treatment/disposal of hazardous materials and chemicals, as well as any releases of these materials that may impact the Proposed Project. The databases reviewed are provided in Attachment 4.8–A: EDR DataMap Corridor Study.

#### **Historical Use**

Aerial photographs and topographic maps were reviewed, where available, to assess historical site and adjacent property uses and to determine the potential for encountering hazardous materials related to historical uses in the Proposed Project area.

#### Site Reconnaissance

A reconnaissance survey of the Proposed Project was conducted by Erika Carrillo of Insignia Environmental on May 16, 2014. Accessible portions of the Proposed Project area were observed for evidence of hazardous materials use and storage, or releases of hazardous materials or petroleum products. Portions of the Proposed Project not accessible during the site visit due to terrain were observed from public roadways or Proposed Project access roads.

### 4.8.2 Existing Conditions

The following subsections discuss the regulatory and physical setting of the Proposed Project as it relates to hazards and hazardous materials. Federal, state, and local plans and policies relevant to hazards and hazardous materials are summarized and the Proposed Project's environmental setting is described.

# **Regulatory Background**

The following subsections describe federal, state, and local regulations regarding hazards and hazardous materials that are relevant to the Proposed Project.

#### **Federal**

United States Environmental Protection Agency

The United States (U.S.) Environmental Protection Agency (EPA) maintains a list of materials considered to be hazardous to the environment or to human health. Those materials are categorized as follows:

- F-List: Wastes from the F-list are published under Title 40, Section 261.31 of the Code of Federal Regulations (CFR). They include non-specific source wastes common in manufacturing and industrial processes.
- K-List: K-list wastes are published under Title 40, Section 261.32 of the CFR. They include source-specific wastes from particular industries, including pesticide manufacturing and petroleum refining.
- P-List and U-List: Wastes from the P-List and U-List are published under Title 40, Section 261.33 of the CFR. They include discarded commercial chemical products in an unused form.

Waste that has not been previously listed may still be considered hazardous if it exhibits one or more of the following characteristics: ignitibility, corrosivity, reactivity, or toxicity (40 CFR Section 261 Subpart C).

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) regulates potential health and environmental problems associated with both hazardous and non-hazardous waste. This law is implemented by the EPA through Subtitle C, Title 42, Section 6921 et seq. of the U.S. Code (U.S.C.), and its implementing regulations (40 CFR Section 260 et seq.). The generation,

transportation, treatment, storage, and disposal of hazardous waste is regulated through Subtitle C of the RCRA, which addresses a "cradle-to-grave" approach to hazardous waste management. All states are subject to Subtitle C with regard to hazardous waste generation. The RCRA also specifies the quantities of wastes that are regulated.

Comprehensive Environmental Response, Compensation, and Liability Act and Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act (SARA), together with their implementing regulations, govern the use, planning, reporting, clean-up, and notification of hazardous materials and hazardous material releases into the environment. These statutes are implemented in Title 40, Sections 239 through 282 of the CFR, and the regulations are defined in Title 40, Sections 302 through 355 of the CFR.

Annual reporting requirements for hazardous materials released into the environment—including both routine discharges and spill releases—are provided in Title 42, Section 11023 of the U.S.C. and Title 40, Section 372.30 of the CFR. In addition, Title III of SARA (identified as the Emergency Planning and Community Right-To-Know Act of 1986) requires that all states develop and implement local chemical emergency preparedness programs and make available information pertaining to hazardous materials used at facilities within local communities.

#### Clean Water Act and Clean Air Act

The Clean Water Act provides measures governing the accidental release of hazardous materials to surface waters, and the Clean Air Act (CAA) provides measures aimed at preventing the accidental release of hazardous materials into the atmosphere. Regulations implementing the CAA and governing hazardous materials emissions are provided in Title 40, Part 68 of the CFR.

# Occupational Safety and Health Act

The hazardous materials regulations of the Occupational Safety and Health Act govern worker safety, with separate standards developed for construction and industrial workers. Generally, Title 29, Part 1926 of the CFR governs construction worker safety, while Title 29, Part 1910 of the CFR applies to industrial workers.

## Hazardous Materials Transportation Act

U.S. Department of Transportation regulations govern the interstate transport of hazardous materials and wastes through implementation of the Hazardous Materials Transportation Act (HMTA). The HMTA contains requirements for hazardous materials shipments and packaging, as well as guidelines for marking, manifesting, labeling, packaging, placarding, and spill reporting. Specific regulations dealing with hazardous materials are covered in the CFR under Title 49, Section 173.50 et seq.; Title 49, Section 173.56 (Hazardous Material Regulations, Shippers – General Requirements for Shipping and Packaging); and Title 49, Part 397 (Transportation of Hazardous Materials; Driving and Parking Rules).

#### State

# Division of Occupational Safety and Health

The California Occupational Safety and Health Act of 1970 provides measures that address the safety of construction and industrial workers; Title 8 of the California Code of Regulation (CCR) implements the majority of these measures. The California Occupational Safety and Health Administration (Cal/OSHA) is responsible for enforcing the occupational and public safety laws adopted by the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA). OSHA is responsible for the regulation of workplace hazards and hazardous materials at the federal level, while Cal/OSHA regulates hazards and hazardous materials at the state level.

Department of Toxic Substances Control and California Environmental Protection Agency

The California EPA (CalEPA) is charged with developing, implementing, and enforcing the state's environmental protection laws. CalEPA's Department of Toxic Substances Control (DTSC) regulates hazardous waste, cleans up existing contamination, and attempts to reduce the amount of hazardous waste produced in California.

## Regional Water Quality Control Board

The San Diego Regional Water Quality Control Board (RWQCB) is responsible for protecting the beneficial uses of surface water and groundwater resources in the San Diego area. The RWQCB adopted a Water Quality Control Plan (Basin Plan) in September 1994 and amended the plan in April 2011. The Basin Plan sets forth implementation policies, goals, and water management practices in accordance with the Porter-Cologne Water Quality Control Act. The Basin Plan establishes both numerical and narrative standards and objectives for water quality aimed at protecting aquatic resources. Proposed Project discharges to surface waters in the region are subject to the regulatory standards set forth in the Basin Plan, which prevents the discharge of hazardous materials into waters of the U.S. The RWQCB also enforces the provisions of the state statutes that protect groundwater.

#### California Hazardous Materials and Waste Codes

Within the State of California, the storage, handling, use, and/or disposal of hazardous materials is regulated through various sections of the California Health and Safety Code (HSC). Individual states are required by the RCRA to develop their own programs for the regulation of hazardous waste discharges; however, such plans are required to meet or exceed RCRA requirements.

The California Hazardous Waste Control Law (HWCL) addresses the control of hazardous wastes for the state. The HWCL regulates generators of universal waste (e.g., batteries, mercury control devices, dental amalgams, aerosol cans, and lamps/cathode ray tubes) under HSC Section 25100 et seq., as well as hydrocarbon waste (e.g., oils, lubricants, and greases) that is not classified as hazardous waste under RCRA. The DTSC is responsible for the administration and enforcement of the HWCL.

The Hazardous Materials Release Response Plans and Inventory Act (HSC Section 25500 et seq.) and regulations provided in Title 19, Section 2620 et seq. of the CCR require local

governments to be responsible for the regulation of facilities that store, handle, or use hazardous materials above threshold quantities (TQs). The TQs for identified hazardous materials are as follows: 55 gallons for liquids, 500 pounds for solids, and 200 cubic feet for compressed gases measured at standard temperature and pressure. Any facility storing such hazardous materials in excess of TQs is required to prepare a Hazardous Materials Business Plan (HMBP) to identify its internal response requirements to accidental spills. The HMBP may identify emergency contacts, hazardous material inventory and quantities, control methods, emergency response measures, and employee training methods. HMBPs must be submitted to the appropriate local administering agency (typically, the local fire department or public health agency). In the event of a spill from such a facility, both the local administrative agency and the California Governor's OES must be notified.

HSC Section 25249.5 et seq. of the Safe Drinking Water and Toxics Enforcement Act (i.e., Proposition 65) is administered through the California Office of Environmental Health Hazard Assessment. Proposition 65 regulates cancer-causing and reproduction-impairing chemicals. Under Proposition 65, users of such regulated chemicals are required to issue a public warning before potential exposure to chemicals above a threshold amount occurs (HSC Section 25249.6). In addition, Proposition 65 is aimed at preventing discharges or releases of specified hazardous materials into a drinking water source. The Proposition 65 chemicals of concern list (HSC Section 25249.5) is periodically updated.

HSC Section 25404 et seq. includes the California Unified Hazardous Waste and Hazardous Material Management Regulatory Program Act, which establishes specific requirements for the local handling of hazardous waste by instituting a Certified Unified Program Agency (CUPA). The responsibility for managing local hazardous wastes is delegated by CalEPA to the CUPA through a Memorandum of Understanding. The primary CUPA for the Proposed Project site is the County of San Diego Department of Environmental Health (DEH) Hazardous Materials Management Division (HMMD).

#### California Public Resources Code

The California Public Resources Code (PRC) provides regulations to enhance safety in the operation and management of electrical power lines. These include, but are not limited to, the following:

- PRC Section 4292: This section requires the clearing of flammable vegetation around specific structures that support certain connectors or types of electrical apparatus. An approximately 10-foot radius around such structures must remain clear of vegetation for the entire the fire season.
- PRC Section 4293: This section requires specific clearance between conductors and vegetation. As the line voltage increases, the radius of clearance also increases. It also requires the removal of some trees if they pose a risk of falling on an electrical power line and causing damage.

### California Public Utilities Commission General Order 95

The California Public Utilities Commission (CPUC) regulates privately owned energy facilities, including natural gas, water, and electrical facilities, as well as railroad and passenger transportation facilities. General Order (GO) 95—originally adopted by the CPUC on December 23, 1941 and amended through 2014—contains requirements and specifications for overhead electric power line construction. These requirements are intended to ensure safety to persons engaged in the construction, maintenance, operation, and use of electrical facilities. The regulations are also intended to ensure the general reliability of the state's utility infrastructure and services.

Rule 35 of GO 95 establishes minimum clearances between line conductors and nearby vegetation for fire prevention purposes. These minimum clearances for vegetation management must be maintained through activities such as tree trimming prior to construction and throughout operation and maintenance of utility facilities.

## California Department of Forestry and Fire Protection Unit Fire Management Plans

CAL FIRE has developed an individual Unit Fire Management Plan for each of its 21 units and six contract counties. These plans include stakeholder contributions and priorities and identify strategic areas for pre-fire planning and fuel treatment. CAL FIRE has developed a strategic fire management plan for the San Diego Unit, which covers the Proposed Project area, addresses citizen and firefighter safety, watersheds and water, timber, wildlife and habitat (including rare and endangered species), unique areas (scenic, cultural, and historic), recreation, range, structures, and air quality. The plan includes stakeholder contributions and priorities, and identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work with the local fire issues.

## Local

Because the CPUC has exclusive jurisdiction over the siting, design, and construction of the Proposed Project, the Proposed Project is not subject to local discretionary land use regulations. The following discussion of the local regulations relating to hazards and hazardous materials is provided for informational purposes. As outlined in the following subsections, the construction and operation of the Proposed Project will not conflict with any environmental plans, policies, or regulations related to hazards and hazardous materials.

# County of San Diego

Within the County of San Diego, hazardous materials are addressed through various County codes and regulations. As the CUPA, the HMMD's hazardous material requirements include hazardous waste determination, storage and transportation of hazardous waste, treatment and disposal requirements, biennial reporting, emergency preparedness and prevention, emergency procedures, business plans, personnel training, and standards for violations. Regulations for the storage and use of explosives are provided in San Diego County General Regulation Section 6904.

The County of San Diego Fire Code includes requirements for access roads, emergency access, maintenance for vacant property, disposal of wood chips and other organic materials, blasting,

hazardous fire areas, use of spark arresters, open-flame equipment, and use of fire roads and firebreaks. In addition, the Fire Code provides requirements for brush and vegetative growth management along power line rights-of-way (ROWs). Brush clearance requirements for structures and roadways are identified in the County of San Diego Fire Code Section 68. Other fire regulations for the County are provided in the County of San Diego General Regulation Section 6905.

# City of San Diego General Plan and Municipal Code

The Public Facilities, Services, and Safety Element of the City of San Diego General Plan addresses public facilities and services, such as fire and rescue, police, storm water protection, and disaster preparedness. The General Plan identifies goals and policies intended to allow for the efficient and adequate provision of public services and facilities, as well as to reduce the potential for hazardous or emergency situations to occur.

In addition, the Proposed Project site is within the Brown Field Municipal Airport Influence Area, as designated in the Brown Field Airport Land Use Compatibility Plan (ALUCP). The Influence Area provides supplemental regulations for property surrounding the Brown Field Municipal Airport, which is located approximately 0.8 mile south of the Proposed Project. The Airport Influence Area provides measures pertaining to land use compatibility, noise impacts, and safety hazards, among other issues.

# City of Chula Vista Urban-Wildland Interface Code

The City of Chula Vista's Urban-Wildland Interface Code contains regulations for mitigating life and property hazards due to wildland fire exposures and fire exposures from adjacent structures, and for preventing structure fires from spreading to wildland.

#### Otay Subregional Plan

The Otay Subregional Plan implements all existing elements of the County of San Diego General Plan. The Subregional Plan identifies policies to discourage industries with pollution or other nuisance characteristics from locating near the U.S.-Mexican border, and to recognize existing and planned safety zones and enforce adequate noise protection near Brown Field Municipal Airport in accordance with the Brown Field ALUCP.

## East Otay Mesa Business Park Specific Plan

The East Otay Mesa Business Park Specific Plan establishes a planning framework for a comprehensive approach to the development of the East Otay Mesa area, in accordance with all County of San Diego goals, objectives, and policies. The East Otay Mesa Specific Plan implements the policies of the County of San Diego General Plan, including the Otay Subregional Plan. Consistent with County of San Diego's public safety goal of minimizing injury, loss of life, and damage to property from fire, the East Otay Mesa Specific Plan requires development applicants to have fuel modification plans reviewed by the appropriate fire department and to implement fire suppression/brush management in areas surrounding the development.

#### Otay Mesa Community Plan

The Land Use Element of the Otay Mesa Community Plan addresses hazardous and toxic substances. The Community Plan contains policies and recommendations to provide adequate distance between land uses with hazardous substances and sensitive receptors, locate intensive uses with hazardous substances within areas designated Heavy-Industrial, establish remediation protocols to reduce public health risks, and require documentation of hazardous materials investigations during review of all development projects.

# Brown Field Municipal Airport Land Use Compatibility Plan

The Proposed Project site is approximately 0.8 mile north and 1.3 miles east of the closest Brown Field Municipal Airport runway. The Airport Land Use Commission (ALUC) is required by federal and state law to create or update ALUCPs for San Diego County's 16 public use and military airports. The ALUCP addresses airport compatibility issues related to noise, safety, airspace protection, and aircraft overflight. Local agencies are required to submit proposed actions to the ALUC for compatibility review until their general plans are found to be consistent with the applicable ALUCP.

#### **Environmental Setting**

## **Existing Hazardous Sites**

According to the EDR DataMap Corridor Study, there is one property (the former Otay Skeet and Trap Shooting Range) with a past or current hazardous materials case located within 0.125 mile of the Proposed Project. More information on this site is provided in Attachment 4.8–A: EDR DataMap Corridor Study. The California DTSC EnviroStor and the State Water Resources Control Board GeoTracker databases list one additional property, the Brown Field Bombing Range, through which a portion of the Proposed Project passes. A discussion of the former Otay Skeet and Trap Shooting Range and the former Brown Field Bombing Range, which have the potential to impact the Proposed Project based on their location (adjacent or upgradient to and in close proximity to the Proposed Project) and the presence of contaminated soil or groundwater follows.

The former Otay Skeet and Trap Shooting Range is located at 5350 Heritage Road in the City of Chula Vista. Former site activities included operation of a shooting range from the mid-1960s through the mid-1990s. The former shooting area extends from the shooting stations to the southern edge of the Otay River floodplain, which is partly defined by a discontinuous soil berm up to a height of approximately nine feet. Chemicals of potential concern include metals (such as lead, arsenic, and chromium) and polycyclic aromatic hydrocarbons (PAHs) in the soil and perchlorate in the groundwater. The DTSC determined that groundwater remediation was not necessary. Soil remediation has been completed; the contaminated soil was covered with a high-density polyethylene geomembrane, a non-woven geotextile cushion, and approximately five feet of clean protective soil cover, which was placed over the geomembrane cap. Pole location 21 is approximately 30 feet south of a portion of the remediation area. Groundwater wells are being monitored by TRC for Flat Rock Land Company for potential releases of perchlorate from the Area of Contamination Engineered Unit. The lead agency for oversight of the site is the County of San Diego DEH, as delegated by CalEPA through the Site Designation Program.

The former Brown Field Bombing Range is located two miles northeast of the Brown Field Air Field in the City of San Diego. From 1942 to 1960, the property was used by the U.S. Navy as a dive-bombing practice range and aerial rocket range. The property is known or suspected to contain military munitions and explosives of concern (e.g., unexploded ordinance [UXO]), and the chemicals of potential concern are metals in the soil.

No orphan sites—sites listed in various databases as being in the vicinity of the researched properties that do not have addresses designated on a map—were identified within 0.125 mile of the Proposed Project.

#### Contaminated Soil and Groundwater

As previously described, contaminated soil and groundwater were identified at the former Otay Skeet and Trap Shooting Range; however, the site has been remediated. Contaminated soil has also been identified at the Brown Field Bombing Range.

No visual or olfactory indications of soil or groundwater contamination were identified during the reconnaissance survey along the Proposed Project corridor. Groundwater depths are expected to be between 18 and more than 100 feet below ground surface (bgs), as described further in Section 4.9 Hydrology and Water Quality.

#### Fire Hazards

The majority of the Proposed Project (approximately 5.9 miles) is located within the CAL FIRE Fire and Resource Assessment Program's Very High Threat to People class, and approximately 1.4 miles of the Proposed Project is located within the Extreme Threat to People class. San Diego County has an extremely fire-prone landscape; the County is dominated by a Mediterranean-type climate (mild, wet winters and hot, dry summers), which supports dense drought-adapted shrub lands that are highly flammable. Winds originating from the Great Basin, locally known as the Santa Ana winds, create extreme fire weather conditions characterized by low humidity, sustained high-speed winds, and extremely strong gusts. The Santa Ana winds create extremely dangerous fire conditions and have been the primary driver of most of California's catastrophic wildfires. High winds can cause power lines to touch, fall onto, or come in contact with adjacent vegetation, causing sparks that could ignite potentially damaging wildfires.

#### **Schools**

There are no schools located within 0.25 mile of the Proposed Project. The closest school is Ocean View Hills School, which is approximately one mile south of the Proposed Project.

# Airports

The Proposed Project alignment is located approximately 0.8 mile north and 1.3 miles east of the closest Brown Field Municipal Airport runway and, therefore, is required by state and local law to be consistent with the Brown Field Municipal Airport ALUCP. The Brown Field Municipal Airport ALUCP describes the noise, safety, airspace protection, and overflight policies and standards adopted to promote compatibility between the Brown Field Municipal Airport and surrounding future land uses. The Proposed Project is located within ALUCP Review Areas 1

and 2. Review Area 1 consists of locations where noise or safety concerns may necessitate limitation on the type of land use actions. Specifically, Review Area 1 encompasses locations exposed to aircraft noise levels of 60 decibels Community Noise Equivalent Level or greater. Review Area 2 consists of locations beyond Review Area 1, but within the airspace protection and/or overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2.

# Emergency Response and Evacuation Plans

The County of San Diego Office of Disaster Preparedness implements the County of San Diego Operational Area Emergency Plan. The Operational Area consists of the County, 18 cities (including the City of San Diego), and all special districts, including school districts. A formal Joint Powers relationship exists between the County and the 18 incorporated municipalities in the County. The Operational Area staff coordinates among all of the public agencies within the County's boundaries and the California Governor's OES. The Operational Area is staffed by the County of San Diego's OES. During a disaster response, the County of San Diego's OES is responsible for activating the County's Emergency Operations Center and coordinating resources at the Operational Area level, as well as collecting status reports and other information from organizations and facilities that may have sustained damage.

The San Diego County Operational Area Evacuation Annex (Annex) was designed to be used as a template for preparation of other jurisdictional evacuation plans and to supplement or support the evacuation plans developed and implemented by local jurisdictions. Strategies, protocols, organizational frameworks, and recommendations that may be used to implement a coordinated evacuation effort within the County of San Diego Operational Area are included in the Annex. It identifies estimates on the resident population within each jurisdiction that may be potentially impacted by certain hazards and would require evacuation, the number of residents that may need assistance securing shelter or transportation, and the estimated number of household pets that may need to be accommodated in the event of an evacuation effort. In addition, the Annex provides hazard-specific considerations, transportation routes, and capacities for general evacuation, shelter capacities throughout the County, locally available resources, resources available through mutual aid, and other special needs considerations.

The Annex includes hazard-specific evacuation routes for dam failure, earthquakes, tsunamis, floods, and wildfires. Primary evacuation routes consist of the major interstates, highways, and prime arterials within San Diego County.

The City of San Diego's Fire-Rescue Department Community Emergency Response Teams (CERTs) help local communities build an as-needed base of emergency preparedness. The CERT program brings together neighbors, team members, and co-workers within their own community, in coordination with the San Diego Fire-Rescue Department. Other agencies—such as the City of San Diego Office of Homeland Security, the San Diego Police Department, the San Diego County Sheriff's Department, and the County of San Diego's OES—also offer coordinated services in the event of an emergency or evacuation.

### **4.8.3** Impacts

The following subsections describe the criteria of significance used to assess potential impacts from hazards and hazardous materials that may result from implementation of the Proposed Project, and examine those potential impacts.

# Significance Criteria

Standards of significance were derived from Appendix G of the California Environmental Quality Act (CEQA) Guidelines. Impacts to hazards and hazardous materials would be considered significant if the Proposed Project:

- Creates a hazard to public health or the environment by the routine transport, use, or disposal of hazardous materials
- Creates a hazard to the public or the environment by reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
- Emits hazardous emissions or handles hazardous materials within 0.25 mile of a school
- Is located at a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a hazard to the public or the environment
- Is located within two miles of a public or private airport and results in a safety hazard for people residing or working in the Proposed Project area
- Impairs implementation of, or physically interferes with, an adopted emergency response or evacuation plan
- Exposes people or structures to a risk of loss, injury, or death related to wildland fires

# Question 4.8a - Hazardous Material Transport, Use, or Disposal

# Construction - Less-than-Significant Impact

Construction of the Proposed Project will require the use of fuel and lubricants inside vehicles and equipment. Use of these hazardous materials during construction may pose health and safety hazards to construction workers, nearby residents, and the environment surrounding the Proposed Project. Potential impacts from the use of hazardous materials are generally associated with spills or other unauthorized releases during Proposed Project activities, such as vegetation trimming; construction of new structures, including excavation and pole setting; and conductor stringing, splicing, and tensioning. Other potential impacts involving the use of hazardous materials during construction are associated with temporary storage sites, transportation to work areas, and refueling and servicing of equipment. A general listing of types of chemicals used during construction is provided in Table 4.8-1: Hazardous Materials Typically Used During Construction. Hazardous materials in the ROWs will be limited to fuel for construction equipment and vehicles, lubricants for tools, and similar substances as described and listed in Table 4.8-1: Hazardous Materials Typically Used During Construction.

**Table 4.8-1: Hazardous Materials Typically Used During Construction** 

Hazardous Materials				
ABC fire extinguisher	Gasoline treatment			
Acetylene gas	Hot stick cleaner (cloth treated with polydimethylsiloxane)			
Air tool oil	Hydraulic fluid			
Ammonium hydroxide	Insecticide (1,1,1-trichloroethene)			
Antifreeze (ethylene glycol)	Insulating oil (inhibited, non-polychlorinated biphenyl)			
Automatic transmission fluid	Lubricating grease			
Battery acid (in vehicles)	Mastic coating			
Bottled oxygen	Methyl alcohol			
Brake fluid	Motor oils			
Canned spray paint	Paint thinner			
Chain lubricant (contains methylene chloride)	Propane			
Connector grease (penotox)	Puncture seal tire inflator			
Contact Cleaner 2000 (precision aerosol cleaner)	Safety fuses			
Diesel de-icer	Starter fluid			
Diesel fuel	Two-cycle oil (contains distillates and hydro-treated heavy paraffinic)			
Diesel fuel additive	WD-40			
Eyeglass cleaner (contains methylene chloride)	ZEP (safety solvent)			
Gasoline	ZIP (1,1,1-trichloroethane)			

No storage or use of large quantities of any of these materials will be required within the Proposed Project ROWs. Due to the limited amount of these materials that will be required, impacts associated with a large release that could affect the local environment are not anticipated. While fuel trucks will be used on site, the likelihood of a major spill from their use is low. Refueling of equipment and vehicles will typically take place at the staging yards with the use of secondary containment devices to minimize potential fuel releases. In addition, SDG&E construction crews will keep a spill kit at each work area for use in the event of a spill, in accordance with SDG&E's Water Quality Construction Best Management Practices (BMP) Manual.

Construction of the Proposed Project will result in the generation of various waste materials that will require recycling and/or disposal. Waste items and materials will be collected by construction crews and stored in roll-off boxes or other similar containers at the staging yards. All waste materials that are not recycled will be characterized by SDG&E to ensure appropriate disposal. Non-hazardous waste will be transported to licensed local waste management facilities, as described in Section 4.17 Utilities and Service Systems. Hazardous materials will be disposed of at facilities that are permitted to accept such materials, in accordance with all applicable local, state and federal laws and regulations. For example, the nearest Class I hazardous waste landfills to the Proposed Project alignment are the Chemical Waste Management Kettleman Hills Facility in Kettleman City and the Clean Harbors Buttonwillow Landfill in Buttonwillow. The nearest Class III landfill to the Proposed Project alignment is the Otay Landfill in Chula Vista, which accepts construction, demolition, and non-hazardous waste.

Prior to the removal of existing poles, the existing overhead 69 kilovolt (kV) conductors will be transferred to the new poles, and the existing underground 69 kV cable currently under State Route 125 will be replaced with overhead 69 kV conductors installed on new poles. Portions of the distribution conductors will be transferred to the new poles, and portions of the distribution conductors will be removed and delivered to a suitable facility for recycling. As the existing wood poles have been treated with chemicals, they will be classified as exempt hazardous waste and disposed of at Otay Landfill, a Class III lined landfill that is permitted to accept treated wood waste.

Soil sampling at the former Brown Field Bombing Range site revealed elevated metals concentrations. SDG&E will implement the following Project Design Feature and Ordinary Construction/Operating Restriction, as described in Chapter 3 – Project Description:

• Soil testing for metals contamination will be conducted for all excavation sites within 500 feet of the former Brown Field Bombing Range Formerly Used Defense Site (FUDS-) eligible property boundary. In addition, an Unanticipated Soil Contamination Handling Plan will be prepared to address the procedures for discovery of contaminated soil encountered during testing or excavation activities. This plan will contain guidelines for the characterization, any necessary removal, transport, and disposal of impacted soil requiring excavation during construction. The plan will also emphasize that all activities within or in close proximity to contaminated areas will adhere to all applicable environmental and hazardous waste laws and regulations.

- Prior to construction, all SDG&E, contractor, and subcontractor Proposed Project
  personnel will receive training on the work practices necessary for effective
  implementation of the Project Design Features and Ordinary Construction/Operating
  Restrictions to comply with applicable hazardous materials-related laws and regulations.
- If soil that is stained, discolored, odorous, or otherwise suspect is encountered in other areas of the Proposed Project during excavation activities, work will be stopped and a qualified Environmental Professional will evaluate. Soil will either be sampled in place and analyzed to determine appropriate management options or containerized and managed in accordance with all applicable federal, state, and local regulations. Based on the results of observation and analysis, SDG&E will decide whether to remove or avoid the contaminated soil.

With implementation of these Project Design Feature and Ordinary Construction/Operating Restriction, impacts associated with contaminated soil and hazardous materials handling will be less than significant.

With the implementation of the Project Design Features and Ordinary Construction/Operating Restrictions, any potential impacts will be less-than-significant.

### Operation and Maintenance - No Impact

Operation and maintenance activities for the Proposed Project will be conducted in the same manner as the existing facilities. Operation and maintenance activities are expected to decrease slightly as a result of the Proposed Project due to the lower maintenance requirements of the replacement steel poles relative to the existing wood poles. Consequently, less frequent use of hazardous materials will be required within the Proposed Project ROWs, and no impacts will occur from hazardous material transport, use, or disposal due to operation and maintenance of the Proposed Project.

# **Question 4.8b – Reasonably Foreseeable Upset and Accident Conditions**

#### Construction – Less-than-Significant Impact

As discussed in the response to Question 4.8a – Hazardous Material Transport, Use, or Disposal, a potential exists for hazardous materials used during construction to be inadvertently released through spills or leaks. With the implementation of the Project Design Features and Ordinary Construction/Operating Restrictions, which include training and compliance with federal and state regulations concerning hazardous materials handling, any potential for a spill and any associated impacts will be less than significant.

#### Operation and Maintenance – No Impact

As discussed in the response to Question 4.8a – Hazardous Material Transport, Use, or Disposal, operation and maintenance activities for the Proposed Project will be conducted in the same manner as the existing facilities. Operation and maintenance activities are expected to decrease slightly as a result of the Proposed Project due to the lower maintenance requirements of the replacement steel poles relative to the existing wood poles. Therefore, no new impacts will

occur from reasonably foreseeable upset or accident conditions due to operation and maintenance of the Proposed Project.

### Question 4.8c – Hazardous Substances in Close Proximity to Schools – No Impact

The Proposed Project is not located within 0.25 mile of an existing or proposed school location. Thus, no impact will occur.

# **Question 4.8d – Existing Hazardous Materials Sites**

# Construction - Less-than-Significant Impact

As described previously in Section 4.8.2 Existing Conditions, two hazardous materials sites pose potential risks to the Proposed Project. The former Brown Field Bombing Range is a DTSC state response site, and the Proposed Project alignment crosses approximately 1.8 miles of the FUDS-eligible property boundary. As described in Section 4.8.2 Existing Conditions, the property is known or suspected to contain UXO and metals in the soil. Preparation of the work areas and excavation of pole holes within the property boundary could harm workers if a UXO is encountered and explodes during construction activities. To prevent workers from encountering UXOs, SDG&E will implement the previously described Project Design Feature and Ordinary Construction/Operating Restriction for soil testing, along with the following Project Design Feature and Ordinary Construction/Operating Restriction, as described in Chapter 3 – Project Description:

• Prior to construction, SDG&E will evaluate the UXO risk along the power line alignment and at the proposed work areas between pole locations 63 and 95 within the former Brown Field Bombing Range FUDS-eligible property boundary. A qualified UXO technician will conduct a surface sweep by walking along the power line route, visually surveying the work areas for any evidence of munitions debris or munitions hazards. All potential munitions hazards will be marked on the Proposed Project alignment sheets and recorded using a Global Positioning System device. The UXO technician will inform SDG&E of munitions findings and direct them to shift the work areas appropriately to a non-hazardous area. A UXO technician will be on site during all earth-disturbing activities in potential munitions hazards areas to monitor the work and ensure that hazardous areas are avoided. If a UXO is discovered during Proposed Project-related construction activities, excavation activities in the vicinity will cease and the on-site UXO technician will assess the condition of the munition. Upon discovery, the San Diego County Sheriff's Bomb/Arson Unit will be notified. Excavation activities in the vicinity will not resume until the UXO has been removed.

The former Otay Skeet and Trap Shooting Range is a DTSC evaluation site; pole location 21 is located approximately 30 feet south of a portion of the DTSC remediation area. As described in Section 4.8.2 Existing Conditions, the property is known to contain lead, arsenic, chromium, and PAHs in the soil and perchlorate in the groundwater. The soil remediation has been completed and the case closed. The DTSC determined that groundwater remediation was not necessary, and groundwater wells are being monitored by TRC for the Flat Rock Land Company to detect releases of perchlorate from the Area of Contamination Engineered Unit; therefore, based on current data, excavation of the pole holes will not encounter contaminated groundwater. As

described previously, groundwater depths are expected to be between 18 and more than 100 feet bgs, and the deepest excavation is approximately 16 feet bgs; therefore, excavation for the new poles is not anticipated to encounter any groundwater. With the implementation of the Project Design Features and Ordinary Construction/Operating Restrictions described previously, any potential impacts from existing hazardous materials sites will be less than significant.

# Operation and Maintenance - Less-than-Significant Impact

The only hazardous materials sites located within 0.125 mile of the Proposed Project are the former Brown Field Bombing Range and former Otay Skeet and Trap Shooting Range. No soil disturbance or excavation that would encounter contaminated groundwater associated with these sites is anticipated during routine operation and maintenance activities; however, if required, SDG&E will follow its internal environmental release process in the same manner as currently used for the power line. Therefore, the potential for uncovering existing hazardous materials sites during operation and maintenance of the Proposed Project is unlikely, and any potential impacts will be less than significant.

# Question 4.8e - Public Airport Hazards - Less-than-Significant Impact

The Proposed Project site is located approximately 0.8 mile north and 1.3 miles east of the Brown Field Municipal Airport. The Proposed Project will be designed and constructed in accordance with the noise, safety, airspace protection, and overflight policies and standards described in the Brown Field Municipal Airport ALUCP, which were designed to prevent new structures from becoming hazards to air navigation. Per the ALUCP, structures that are 200 feet above ground level will require coordination with the Federal Aviation Administration (FAA).

Per the ALUCP requirements, coordination with the FAA is required prior to construction of the Proposed Project due to its proximity to the Brown Field Municipal Airport. Because some of the steel poles—which will be up to approximately 90 feet tall and are located within one mile from the airport—will exceed the one-to-100 ratio required by Title 14, Section 77.9 of the CFR for airspace and navigation, SDG&E consulted with the FAA. The FAA conducted an obstruction evaluation and determined that there is no need for lighting or marking on the poles. Therefore, impacts to public airports will be less than significant.

# **Question 4.8f – Private Airstrip Hazards – No Impact**

No components of the Proposed Project are located within two miles of a private airstrip, and thus will not affect or disrupt existing operations or worker safety at such a facility. Therefore, no impact will occur.

# Question 4.8g – Emergency Evacuation and Response Plan Interference – No Impact

Emergency access will not be impacted by the Proposed Project because the power line does not cross over the evacuation routes in the area identified in the County of San Diego Operational Area Emergency Plan Evacuation Annex—which include Interstate (I-) 5, I-805, and I-905. Therefore, the Proposed Project will not interfere with the County of San Diego Operational Area Emergency Plan.

# **Question 4.8h – Wildland Fires**

# Construction - Less-than-Significant Impact

The mechanical and structural design and construction of the line must meet the requirements of CPUC GO 95. SDG&E takes into account normal and unusual structural loading in its designs under GO 95 to prevent fire hazards. The Proposed Project is being implemented to further reduce potential impacts from wildland fires, and the wood-to-steel pole conversion of the line is designed to reduce the potential for a fire hazard.

Construction activities could result in a fire due to the increased presence of vehicles, equipment, and human activity in areas of elevated fire hazard severity. In particular, heat or sparks from construction vehicles or equipment have the potential to ignite dry vegetation. SDG&E will implement the following Proposed Project Design Feature and Ordinary Construction/Operating Restriction, as described in Chapter 3 – Project Description, to assist in safe practices that prevent fires:

- SDG&E will implement the Proposed Project-specific Construction Fire Prevention Plan provided in Attachment 4.8–B: Construction Fire Prevention Plan, which includes the following:
  - a description of the procedures for minimizing fire potential
  - the requirements of Title 14, California Forest Practice Rules of the California Code of Regulations
  - relevant components of the SDG&E Wildland Fire Prevention and Fire Safety Plan
  - the firefighting equipment (e.g., shovels, pulaskis, and backpack pumps) that must be maintained on site and in vehicles for the duration of construction
  - the appropriate timing and use of fire-protective mats or shields during grinding and welding operations
  - emergency response and reporting procedures
  - relevant emergency contact information

Consistent with the aforementioned plans, before starting construction activities, SDG&E will assess the work areas, access roads, and ROW for wildland fire risk prior to beginning operations at the work areas. Hazard reduction will be performed in accordance with the Construction Fire Prevention Plan and environmental specifications. The vegetation removed will be disposed of according to vegetation management standards and landowner guidance. As a result of implementing the practices and plans described in this section, any potential impacts from wildland fires will be less than significant.

# Operation and Maintenance – Less-than-Significant Impact

As discussed in the response to Question 4.8a – Hazardous Material Transport, Use, or Disposal, operation and maintenance of the Proposed Project will be conducted in the same manner as the existing line, which is covered under SDG&E's existing policies and procedures for these activities. No change will occur in the operation and maintenance of the line, except with regard to the frequency of these activities, which will decrease.

SDG&E currently implements PRC 4292 and 4293 clearance requirements around the poles. As described previously, SDG&E will also implement its existing Wildland Fire Prevention and Fire Safety Electric Standard Practice (ESP 113.1) during all operation and maintenance work.

Vehicles will use only existing access roads to access Proposed Project components during operation and maintenance activities. In addition, SDG&E will mow or trim vegetation along the roads, which will reduce the potential for vehicle heat to ignite dry vegetation and start a fire. With implementation of these measures, any potential exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires as a result of operation and maintenance of the Proposed Project will be less than significant.

# **4.8.4** Applicant-Proposed Measures

Because the Proposed Project will not result in any significant impacts from hazards or hazardous materials, no applicant-proposed measures have been proposed.

# 4.8.5 References

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