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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?			✓	
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?				✓
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 and operation and maintenance (O&M) of the proposed San Diego Gas & Electric Company (SDG&E) TL674A Reconfiguration & TL666D Removal 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, with the implementation of SDG&E’s Project Design Features and Ordinary Construction Restrictions, 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 following:

- The Environmental Data Resources, Inc. (EDR) DataMap Corridor Study prepared for the Proposed Project and included as Attachment 4.8-A: EDR DataMap Corridor Study;
- the City of San Diego General Plan;
- the Community Plan for the City of Del Mar;
- 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 Del Mar; and
- the Office of Emergency Services (OES) websites for the City of San Diego and the City of Del Mar.

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 EDR database searches identified hazardous materials sites located within one mile of the Proposed Project alignment and compiled information regarding 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 results of the database searches, as well as a list of the databases reviewed, are provided in Attachment 4.8-A: EDR DataMap Corridor Study.

4.8.2 Existing Conditions

Regulatory Background

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. These materials are identified in the following three categories:

- F-List: Wastes from the F-list are published under Title 40, Section 261.31 of the Code of Federal Regulations (CFR). These wastes 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. These wastes include source-specific wastes from specific industries, including pesticide manufacturing and petroleum refining.
- P-List and U-List: Wastes from the P- and U-lists are published under Title 40, Section 261.33 of the CFR. These wastes 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 261 Subpart C).

Uniform Building Code and Uniform Fire Code

The Uniform Building Code (UBC) and the Uniform Fire Code (UFC) provide codes for fire protection at the federal level. To minimize potential fire risk and damage to structures, the UBC provides requirements to which building construction, materials, and other elements or construction practices must adhere. In addition, the UFC provides design measures for installation of fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards and safety measures, hazardous material storage and use, and other general and specialized requirements pertaining to fire safety and prevention.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) regulates potential health and environmental problems associated with hazardous and non-hazardous waste. This law is implemented by the U.S. EPA through Title 42, Section 6921 et seq., Subtitle C of the U.S. Code (U.S.C.) and its implementing regulations (40 CFR 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 provides the specific quantities of wastes that are regulated under the act.

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, cleanup, and notification with regard to hazardous materials and hazardous material releases into the environment. These statutes are codified in Title 40, Parts 239 through 282 of the CFR and the regulations are defined in Title 40, Parts 302 through 355 of the CFR.

Annual reporting requirements associated with hazardous materials released into the environment are provided in Title 42, Section 11023 of the U.S.C. and Title 40, Section 372.30 of the CFR. Reporting of both routine discharges and spill releases is required. 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 that are used at facilities within local communities.

Occupational Safety and Health Administration

The Occupational Safety and Health Act of 1970 contains specific requirements that ensure worker safety in the presence of certain hazardous substances, such as lead and asbestos. The Occupational Safety and Administration (OSHA) regulations—which are intended to create a safe workplace—are found in 29 CFR, Part 1910, Subpart H, and include procedures and standards for safe handling, storage, operation, remediation, and emergency response activities involving hazardous materials and waste. Section 1910.120 (Hazardous Waste Operations and Emergency Response) contains requirements for worker training programs, medical surveillance for workers engaging in the handling of hazardous materials or wastes and hazardous material, and waste site emergency and remediation planning, for those who are engaged in the operations specified by Sections 1910.120(a)(1)(i – v) and 1926.65(a)(1)(i – v).

Clean Water Act/Clean Air Act

The Clean Water Act (CWA) provides measures governing the accidental release of hazardous materials to surface waters. Similarly, 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. Implementation of these regulations is intended to prevent the accidental release of hazardous materials into the environment.

State

California Occupational Safety and Health Act of 1970

The California Occupational Safety and Health Act of 1970 provides measures to 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 Division of Occupational Safety and Health (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/California Environmental Protection Agency

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

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. 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. Although groundwater is not used as a municipal or domestic water supply, the RWQCB 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 (H&SC). In addition, H&SC Section 33437 requires lessees or purchasers of property in a redevelopment project to comply with all covenants, conditions, and restrictions imposed by the agency for the reasonable protection of lenders. 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 Section 25100 et seq. of the H&SC, as well as hydrocarbon waste (e.g., oils, lubricants, and greases) that is not classified as hazardous waste under the federal RCRA regulations. The DTSC is responsible for the administration and enforcement of the HWCL.

The Hazardous Materials Release Response Plans and Inventory Act (H&SC § 25500 et seq.) and regulations provided in Title 19, Section 2620 et seq. of the CCR require that local governments must 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 55 gallons for liquids, 500 pounds for solids, and 200 cubic feet for compressed gases measured at standard temperature and pressure. Facilities storing such hazardous materials in excess of their TQs are required to prepare a Hazardous Materials Business Plan (HMBP) to

identify the facility’s 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. The HMBP is required to be submitted to the local administering agency, which is 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.

H&SC 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. The act 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 (H&SC § 25249.6). In addition, the act is aimed at preventing discharges or releases of specified hazardous materials into a “source of drinking water.” The act provides a list of chemicals of concern (*Id.* § 25249.5), which is periodically updated.

Section 25404 et seq. of the California H&SC includes the California Unified Hazardous Waste and Hazardous Material Management Regulatory Program Act, which establishes specific requirements for handling hazardous waste locally by establishing the Certified Unified Program Agency (CUPA). The responsibility for management of local hazardous wastes is delegated by the California EPA to the local agency through a Memorandum of Understanding. The primary CUPA relative to the Proposed Project site is the County of San Diego’s Department of Environmental Health Hazardous Materials Management Division.

California Building Code

The California Building Code (CBC) provides design and construction measures for structures and other facilities with regard to fire protection and prevention. The CBC supplements the UBC by providing measures that are specific to potential conditions in the State of California. Measures provided in the CBC are integrated and enforced through county and city review of development projects, the Office of the State Fire Marshal, and by local county and city fire chiefs or marshals.

California Public Resources Code

The California Public Resources Code (PRC) provides regulations to enhance safety with regard to the operation and management of electrical transmission 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 entirety of 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 is also required that some trees must be removed if they pose the potential to fall on an electrical transmission line and cause damage.

California Public Utilities Commission

The California Public Utilities Commission (CPUC) originally adopted General Order 95 in 1941. General Order 95 governs the design, construction, and maintenance of overhead electrical lines. Rule 31.1 of General Order 95 generally requires that overhead electrical lines be designed, constructed, and maintained in accordance with accepted good practices for the given conditions known at the time. Rule 35 of General Order 95 establishes requirements for tree trimming.

On January 18, 2012, the CPUC issued D.12-01-032, which adopted significant revisions to General Order 95, Overhead Electric Line Construction, and General Order 165, Inspection Requirements for Electric Distribution and Transmission Facilities. Phase I and Phase II revisions to the General Orders addressed vegetation management practices, inspection cycles, corrective maintenance timeframes, and other fire-reduction measures in fire threat zones.

Local

The Proposed Project is not subject to local discretionary regulations because the CPUC has exclusive jurisdiction over the siting, design, and construction of the Proposed Project. The following discussion of local regulations relating to hazards and hazardous materials is provided for informational purposes.

City of San Diego General Plan

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.

Community Plan for the City of Del Mar

The Community Plan for the City of Del Mar does not specifically address hazardous and toxic substations. The community plan contains policies and recommendations to minimize land uses that pose a major threat to water quality and reduce the quantity and duration of runoff and discharge of pollutants.

Contaminated Sites

To determine those sites that may potentially represent the greatest risk, the following factors were considered:

- **Density of Listed Sites:** The greater the number of listed sites in the vicinity of the Proposed Project, the greater the potential for encountering contamination.
- **Distance between Listed Sites and the Proposed Project:** The greater the distance between listed sites and the Proposed Project, the lesser the potential for encountering contamination.

- **Type of Release and Medium Affected:** Contaminants are typically transported at a faster rate in groundwater than in soil. The volume of a released contaminant, the release date, and the medium impacted all affect how contaminants may have migrated, and therefore affects their potential to result in an impact.

Existing Hazardous Materials Sites

The EDR DataMap Corridor Study, which is provided in Attachment 4.8-A: EDR DataMap Corridor Study, reported 269 database listings within 0.5 or one mile¹ of the Proposed Project. This total does not represent individual hazardous materials sites, as several sites were listed under multiple databases. Seven sites were investigated further based on the proximity to the Proposed Project; the presence of impacted soils, soil vapor, or groundwater up-gradient of the Proposed Project area; and the material threat of a release in the vicinity of the Proposed Project area. The location and risk associated with each hazardous materials site are provided in Table 4.8-1: Hazardous Materials Sites Records Review. More information regarding the sites identified in the EDR DataMap Corridor Study is provided in Attachment 4.8-A: EDR DataMap Corridor Study.

Contaminated Soil and Ground Water

A total of seven hazardous materials sites within 0.5 mile of the Proposed Project reported the presence of current and/or historical subsurface contaminants. Justification for the associated risk (i.e., low risk or no risk) of each hazardous materials site is provided in Table 4.8-1: Hazardous Materials Sites Records Review. No other soil or groundwater contamination was identified in the Proposed Project area.

Fire Hazards

The majority of the Proposed Project (approximately 7.9 miles) is located within the CAL FIRE Fire and Resource Assessment Program's (FRAP's) Very High Threat to People class, and approximately 0.9 mile of the Proposed Project is located within the High Threat to People class. The remaining approximately 0.4 mile of the Proposed Project alignment is located within the Moderate Threat to People class.

San Diego County has an extremely fire-prone landscape and is dominated by a Mediterranean-type climate (i.e., mild, wet winters and hot, dry summers) that supports dense drought-adapted shrub lands, which 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. Wildland fire threat classes in the vicinity of the Proposed Project are depicted in Figure 4.8-1: Wildland Fire Threat Map.

¹ EDR utilizes the search radii specified in ASTM Standard E1527-13 when searching applicable databases or records. The search distance typically ranges from 0.25 to one mile from the Proposed Project.

Table 4.8-1: Hazardous Materials Sites Records Review

Hazardous Materials Site	Type of Hazardous Materials Site ²	Closest Proposed Project Component	Approximate Distance from the Closest Proposed Project Component	Affected Media	Associated Risk	Reason
Precision Engine Controls Corporation	SLIC, RCRA-SQG	TL666D, Pole 1	0.1 mile southwest	Groundwater contaminated with volatile organic compounds	Low Risk	Groundwater beneath this site reportedly flows to the southwest, away from the Proposed Project. In addition, proposed construction activities near this site will not involve ground disturbance. Therefore, subsurface contaminants will not be encountered during construction. As a result, this site does not pose a risk to the Proposed Project.
Kyocera America Incorporated	Site identified on the EnviroStor website	TL666D, Pole 1	0.1 mile southwest	Groundwater contaminated with chlorinated hydrocarbons	Low Risk	Groundwater beneath this site reportedly flows to the southwest, away from the Proposed Project. In addition, proposed construction activities near this site will not involve ground disturbance. Therefore, subsurface contaminants will not be encountered during construction. This site does not pose a risk to the Proposed Project.
Del Mar Heights Road	LUST	TL666D, Pole 65	0.35 mile east	Soil contaminated with petroleum hydrocarbons	Low Risk	Based on the distance between this site and the Proposed Project, this site does not pose a risk to the Proposed Project.

² Regulatory database acronyms:

- LUST = Leaking Underground Storage Tank Facilities
- RCRA-SQG = Resource Conservation and Recovery Act – Small Quantity Generator
- SLIC = Spills, Leaks, Investigations, and Cleanup

Hazardous Materials Site	Type of Hazardous Materials Site²	Closest Proposed Project Component	Approximate Distance from the Closest Proposed Project Component	Affected Media	Associated Risk	Reason
Chevron USA Incorporated	LUST	TL666D, Pole 95	0.4 mile east	Groundwater contaminated with gasoline	Low Risk	Based on the distance between this site and the Proposed Project, this site does not pose a risk to the Proposed Project.
Pacific Beach – Guy Hill Cadillac Site	SLIC	TL666D, Pole 92	0.4 mile east	Groundwater contaminated with petroleum hydrocarbons	Low Risk	Based on the distance between this site and the Proposed Project, this site does not pose a risk to the Proposed Project.
Camp C.J. Miller	Military Evaluation	TL666D, Pole 12	0.2 mile west	Not specified	Low Risk	Based on the distance between this site to the Proposed Project and the absence of documentation regarding the release, this site does not pose a significant risk to the Proposed Project.
Navy Dirigible	Military Evaluation	TL666D, Pole 66	0.2 mile northeast	Not specified	Low Risk	Based on the distance between this site to the Proposed Project and the absence of documentation regarding the release, this site does not pose a significant risk to the Proposed Project.

Source: DTSC 2016; EDR 2016; State Water Resources Control Board (SWRCB) 2016

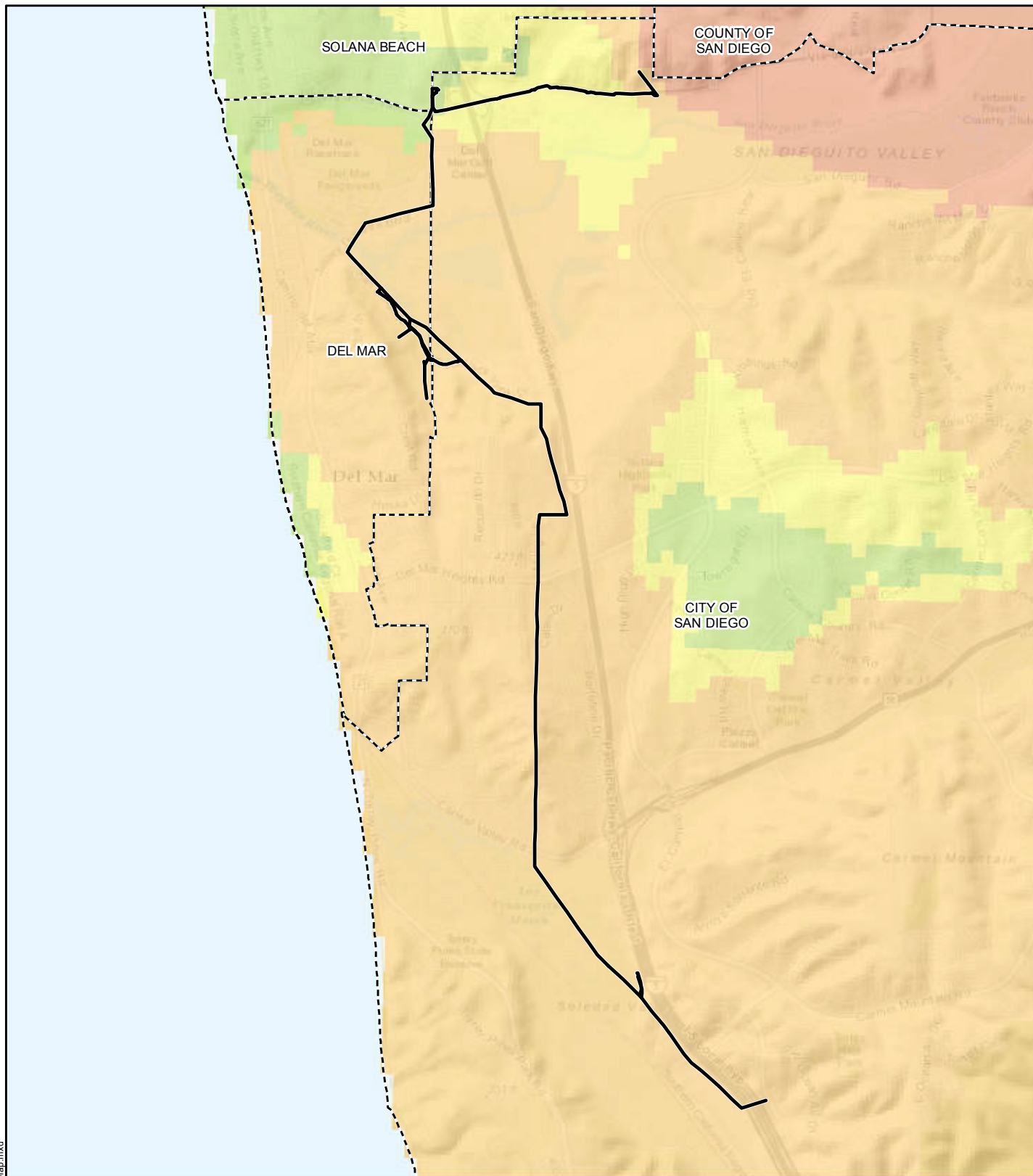
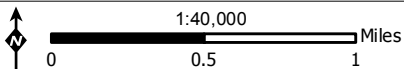


Figure 4.8-1: Wildland Fire Threat Map

TL674A Reconfiguration & TL666D Removal Project

- Proposed Project Alignment
- - - Municipal Boundary
- Fire Threat to People**
- Moderate
- High
- Very High
- Extreme



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Schools

The following seven schools are located within 0.25 mile of the Proposed Project:

- Fusion Academy Solana Beach
- Therapeutic Literacy Center
- Del Mar Hills Elementary School
- Del Mar Hills Nursery School
- Del Mar Heights Elementary School
- Brighter Future Preschool and Child Development Center
- After School Learning Tree

The Del Mar Hills Elementary School, Del Mar Hills Nursery School, Del Mar Heights Elementary School, and Brighter Future Preschool and Child Development Center are located within 500 feet of the Proposed Project.

Airports

There are no airports or private airstrips located within two miles of the Proposed Project. The nearest public airport—McClellan-Palomar Airport—is located approximately 10.4 miles southeast of the Proposed Project. The closest private airport to the Proposed Project is Marine Corps Air Station Miramar, which is located approximately five miles southeast of the southern terminus of the Proposed Project alignment.

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 the City of Del Mar), and all special districts, including school districts. A formal Joint Powers relationship exists between the county and the 18 incorporated municipalities. The Operational Area staff coordinates with 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 (SDFD) Community Emergency Response Teams (CERTs) help local communities build an as-needed base for emergency preparedness. In coordination with the SDFD, the CERT program brings together neighbors, team members, and co-workers within their own community. Other agencies (e.g., 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.

The Del Mar Fire Department maintains one fire station located at the San Diego County Fairgrounds at 2200 Jimmy Durante Boulevard. The service area encompasses approximately 2.5 square miles, over 1,600 structures, and approximately 5,000 residents in the City of Del Mar and surrounding areas in the cities of San Diego, Solana Beach, and Encinitas. The mission of the Del Mar Fire Department is to provide emergency services, fire prevention, and education in a prompt, professional, and compassionate manner.

Evacuation routes designated by the Annex in the Proposed Project area include Interstate (I-) 5 and I-805. The installation of underground facilities during the reconfiguration of TL674A will be conducted underneath an I-5 overpass on Villa De La Valle. Removal activities associated with TL666D will cross I-5 at the southern terminus of the Proposed Project, directly north of the I-805 and I-5 junction.

4.8.3 Impacts

Significance Criteria

Standards of significance were derived from Appendix G of the California Environmental Quality Act Guidelines. Impacts to hazards and hazardous materials will 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 the following:

- spills or other unauthorized releases during Proposed Project activities, such as vegetation trimming;
- construction of new structures, including excavation and pole setting;
- installation of new duct bank; and
- conductor and cable installation and splicing.

A release of hazardous materials could also occur during construction at temporary storage sites, transportation of materials or workers to work sites, or during the refueling or servicing of equipment. Vehicles and equipment used for construction may contain or require temporary, short-term use of potentially hazardous substances, such as fuel, lubricating oils, or hydraulic fluid. A typical list of the types of hazardous materials used during construction and/or O&M is provided in Table 4.8-2: Hazardous Materials Typically Used During Construction. No storage or use of large quantities of any of these materials will be required within the Proposed Project rights-of-way (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 staging areas/fly yards. Fuels and hazardous materials kept at these locations will be stored within secondary containment to minimize potential releases. In addition, SDG&E construction crews will keep spill kits on site for use in the event of a spill, in accordance with SDG&E's Water Quality Construction Best Management Practices Manual (BMP Manual), which is included as Attachment 4.8-B: Water Quality Construction Best Management Practices.

Materials that are excavated, transported, stored, or disposed of during construction of the Proposed Project have the potential to contain hazardous compounds and could present a hazard to construction workers, the public, or the environment if improperly managed. Excavation will be required during trenching and the installation of duct banks, vaults, poles, and guard structures. All non-hazardous materials encountered during excavation activities will be transported to a landfill. Should hazardous materials be encountered, SDG&E will transport

Table 4.8-2: 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)

these materials to an appropriately permitted, approved disposal facility. Should groundwater be encountered during excavation activities, the procedures described in Section 3.5.5 Methods in Chapter 3 – Project Description regarding groundwater discharge will be followed.

As presented in Section 4.8.2 Existing Conditions, several laws, rules, and regulations apply to the routine use of hazardous materials during construction, which include proper handling and disposal of hazardous materials. SDG&E will comply with all such laws, rules, and regulations. All spills will be immediately cleaned up and disposed of in accordance with SDG&E's BMP Manual. Construction will require only small amounts of hazardous materials, and the transport of these materials will primarily occur during the approximately 12-month construction period. In addition, as part of SDG&E's Project Design Features and Ordinary Construction Restrictions, a Safety and Environmental Awareness Program (SEAP) will be developed which will include training on hazardous material protocols and best management practices (BMPs). With adherence to applicable laws and regulations, implementation of SDG&E's BMP Manual, and SEAP training, impacts will be less than significant.

Operation and Maintenance – No Impact

O&M activities for the Proposed Project will be conducted in the same manner as they were prior to construction of the Proposed Project. As described in Chapter 3 – Project Description, O&M of the proposed underground duct banks within Via De La Valle will be installed parallel to existing facilities where O&M activities are currently being conducted. The removal of approximately six miles of 69 kilovolt (kV) power lines from TL666D will eliminate all future O&M activities associated with these facilities. The conversion of C510 and C738 will eliminate O&M requirements associated with approximately 4,530 feet of existing overhead distribution line. Although these conversions will introduce approximately 4,230 feet of new underground duct bank, SDG&E currently owns and operates existing underground distribution facilities in the vicinity of these Proposed Project components. Based on the removal of existing overhead facilities and the installation of Proposed Project components in areas already covered by existing O&M activities, post-construction O&M requirements in the Proposed Project area will be reduced, and no new impacts will occur.

The majority of the chemicals used for ongoing O&M activities will be similar to those used during the construction phase, and the daily use of such chemicals will generally be considerably less during O&M activities relative to construction activities. Consequently, less frequent use of hazardous materials will be required within Proposed Project ROWs, and no impacts will occur from hazardous material transport, use, or disposal during O&M 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, the transport, use, and disposal of hazardous materials could potentially result in an inadvertent spill or leak during construction of the Proposed Project. However, only small amounts of hazardous materials will be used during the approximately 12 months of construction. SDG&E will implement its standard BMPs and maintain spill kits on site to minimize the potential for spills and respond to potential releases of hazardous materials. In addition, implementation of the SEAP will provide construction

personnel with training regarding the application of BMPs and compliance with federal and state regulations. Therefore, impacts resulting from a potential spill of hazardous materials will be less than significant.

Operation and Maintenance – No Impact

As discussed in the response to Question 4.8a, O&M activities will be conducted in the same manner as they were prior to construction of the Proposed Project. Based on the removal of existing overhead facilities and the installation of Proposed Project components in areas already covered by existing O&M activities, post-construction O&M requirements in the Proposed Project area will be reduced. Therefore, no new impacts will result from reasonably foreseeable upset or accident conditions during O&M of the Proposed Project.

Question 4.8c – Hazardous Substances in Close Proximity to Schools

Construction – Less-than-Significant Impact

Schools within 0.25 mile of the Proposed Project are considered sensitive receptors. As previously discussed, the Del Mar Hills Nursery School, Del Mar Heights Elementary School, and Brighter Future Preschool and Child Development Center are located within 500 feet of the Proposed Project. As discussed in the response to Question 4.8b, impacts associated with reasonably foreseeable upset and accident conditions are considered less than significant due to the implementation of SDG&E's BMPs and the maintenance of spill kits on site. In addition, only small amounts of hazardous materials will be used during the approximately 12 months of construction. As such, large spills are not anticipated and hazardous materials released or encountered during construction will be contained and managed through the implementation of applicable BMPs. With the implementation of SDG&E's SEAP, construction personnel will be adequately trained to respond to spills that may occur during the handling or transport of hazardous materials. Due to the temporary and short-term nature of construction and the relatively small quantity of hazardous materials to be used during construction, impacts to schools from potential hazardous substance releases or emissions will be less than significant.

Operation and Maintenance – No Impact

As discussed in the response to Question 4.8a, O&M activities will be conducted in the same manner as they were prior to construction of the Proposed Project. Based on the removal of existing overhead facilities and the installation of Proposed Project components in areas already covered by existing O&M activities, post-construction O&M requirements in the Proposed Project area will be reduced. Therefore, no impact will occur from the use of hazardous substances in the vicinity of schools during O&M.

Question 4.8d – Existing Hazardous Materials Sites Listed in Government Code Section 65962.5

Construction – Less-than-Significant Impact

Construction of the Proposed Project will not result in any impacts related to known hazardous materials sites listed in Government Code Section 65962.5, as no known hazardous materials sites have been identified on the Proposed Project site or on adjacent lands. Although seven sites with past or current hazardous materials cases were identified within 0.5 mile of the Proposed

Project, they do not pose a significant risk to the Proposed Project due to their localized nature, present regulatory status, and distance from the Proposed Project. Furthermore, the majority of the sites identified are located down-gradient or cross-gradient with a reported groundwater direction that flows away from Proposed Project.

As described in Chapter 3 – Project Description, should potentially contaminated soil be encountered during trenching activities, SDG&E will sample in place, test, profile, and transport suspect materials to an appropriately permitted disposal facility in accordance with all federal, state, and local laws and regulations. Should groundwater be encountered during excavation, SDG&E will dewater the excavation area as described in Chapter 3 – Project Description. Groundwater will be pumped, filtered, transferred to a desiltation tank, and tested to ensure compliance with RWQCB National Pollutant Discharge Elimination System requirements. If the water quality does not meet permit requirements, SDG&E will implement additional treatment or filtering procedures until the applicable requirements are met. Based on the implementation of SDG&E’s BMPs and SEAP, impacts will be less than significant.

Operation and Maintenance – No Impact

Long-term O&M activities will not result in significant impacts, as no known existing hazardous materials or contamination sites listed in Government Code Section 65962.5 are located in the vicinity of the Proposed Project. As previously mentioned, seven sites with past or current hazardous materials cases exist within 0.5 mile of the Proposed Project, but do not pose a significant risk to the Proposed Project. Although the Proposed Project will involve the installation of underground facilities, O&M activities will not further disturb underlying surfaces following the construction of these facilities. As such, no impact will occur.

Question 4.8e – Public Airport Hazards – No impact

The Proposed Project is not located within two miles of a public airport, and thus will not affect or disrupt existing operations or worker safety at such a facility. Therefore, no impact will occur.

Question 4.8f – Private Airstrip Hazards – No Impact

The Proposed Project is not 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

Construction – Less-than-Significant Impact

No conflicts with public safety or emergency response and evacuation plans have been identified for construction of the Proposed Project. The majority of construction equipment, vehicles, personnel, and material staging areas will be accommodated within the ROW and property boundaries established for existing facilities. All roadways adjacent to proposed construction activities will remain open to emergency vehicles at all times and emergency access will not be affected during construction.

Portions of the TL674A reconfiguration, TL666D removal, and C510 conversion activities will be conducted within public roadways. As part of the TL674A reconfiguration, approximately 1.1 miles of new underground duct banks will be constructed within Via De La Valle between the existing TL674A overhead crossing and the Del Mar Substation. The conversion of the C510 12 kV distribution lines will require the installation of approximately 3,600 feet of duct bank within San Dieguito Drive and Racetrack View Drive. Duct bank installation and additional construction activities occurring within roadways may require temporary lane closures to provide safe conditions for the public and workers within public areas and roadways.

As described in detail in Section 4.16 Transportation and Traffic, some roads may be temporarily limited to one-way traffic at times and one-way traffic controls will be implemented as required. Road closures and encroachment into public roadways, including I-5, could increase hazards if the appropriate safety measures are not in place, such as proper signage, orange cones, and flaggers. However, SDG&E will obtain the required encroachment permits and authorizations from the City of San Diego and the City of Del Mar for construction activities requiring interstate or public roadway crossings, and will implement the resulting traffic control measures accordingly. In addition, construction within the road may be limited to nighttime hours to avoid traffic impacts during peak hours, and emergency vehicles will be provided access during the temporary road and/or lane closures. Therefore, emergency access will not be directly impacted during construction.

As previously described, removal activities associated with TL666D will cross I-5, which is designated as an evacuation route in the Annex. However, construction activities required for the portion of TL666D that crosses I-5 will only include the removal of existing 69 kV conductors. As such, it is not anticipated that this work will require lane closures. As described in Section 4.16 Transportation and Traffic, temporary lane closures may be required in other locations where the Proposed Project will span or be adjacent to roadways. In these locations, at least one lane of travel will always remain open during construction activities. Impacts related to lane closures will be short term and temporary, lasting up to one week in each location, and will only affect approximately 300 to 500 feet of a roadway at a time. In addition, guard structures will be installed prior to any conductor work that will cross roadways to prevent the conductor from sagging onto other overhead lines or travel lanes, and to avoid prolonged road closures and traffic disruptions. These guard structures will limit the need for temporary lane closures during construction of the Proposed Project. Flaggers may also be used to temporarily halt vehicle traffic in some locations where guard structures or staged equipment are not anticipated to be used.

In the event of an emergency requiring evacuation, SDG&E will ensure that all potential routes are open and accessible for public use by limiting trenching activities to approximately 300 to 500 linear feet per day within a single lane of traffic. As described in Section 4.16 Transportation and Traffic, SDG&E will implement Applicant-Proposed Measure (APM-) TRA-01, which requires coordination with emergency service providers (i.e., the Del Mar Fire Department and the San Diego County Sheriff's Department) prior to construction. Based on the acquisition of applicable encroachment permits and the implementation of traffic control measures and APM-TRA-01, the Proposed Project will not conflict with emergency evacuation or response plans. As a result, potential impacts during construction will be less than significant.

Operation and Maintenance – No Impact

As discussed in the response to Question 4.8a, O&M activities will be conducted in the same manner as they were prior to construction of the Proposed Project. Based on the removal of existing overhead facilities and the installation of Proposed Project components in areas already covered by existing O&M activities, post-construction O&M requirements in the Proposed Project area will not change.

O&M of the new underground facilities that will be installed as part of the TL674A reconfiguration and C510 and C738 conversions may require temporary lane closures. However, these lane closures will be short in duration and will not deviate from the maintenance of existing underground facilities in the area. In addition, all required traffic control measures will be implemented, and emergency vehicles will be provided access during potential lane closures caused by maintenance activities. Therefore, no impact will occur during O&M.

Question 4.8h – Wildland Fires***Construction – Less-than-Significant Impact***

As discussed previously in Section 4.8.2 Existing Conditions, the majority of the Proposed Project is located within the CAL FIRE FRAP’s Very High Threat to People and High Threat to People classes. 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.

As described in Chapter 3 – Project Description, approximately 34 existing wood poles and six miles of existing 69 kV power lines will be removed from service as part of the TL666D removal activities. The TL674A reconfiguration will involve the removal of approximately 700 feet of existing 69 kV power lines and the installation of approximately 1.1 miles of new underground 69 kV power line. The removal of existing wood poles and overhead facilities will reduce the number of flammable structures in the Proposed Project area and reduce the risk of wildland fire. Therefore, construction of the Proposed Project will result in a less-than-significant impact to the risk of loss, injury, or death involving wildland fires.

SDG&E will assess work areas for wildland fire risk and reduce the number of hazards inside and around the perimeter of each work area. Vehicles and equipment will not be staged or parked on vegetation. Vegetation identified as a fire hazard will either be cleared and removed or chipped and spread on site. Cleared vegetation will be disposed of in accordance with instructions from applicable jurisdictional agencies and/or landowners. In addition, SDG&E will implement its existing Operations and Maintenance Wildland Fire Prevention Plan, which is provided in Attachment 4.8-C: SDG&E Operations and Maintenance Wildland Fire Prevention Plan. This plan includes requirements for carrying emergency fire suppression equipment, conducting “tailboard meetings” that cover fire safety discussions, implementing procedural requirements for construction within fire threat zones, restricting smoking and idling vehicles, and implementing restrictions during Red Flag Warnings. Based on the implementation of the practices and plans described in this section and the removal of flammable structures from TL666D, potential impacts from wildland fires will be less than significant.

Operation and Maintenance – No Impact

As discussed in the response to Question 4.8a, O&M activities will be conducted in the same manner as they were prior to construction of the Proposed Project. Based on the removal of existing overhead facilities and the installation of Proposed Project components in areas already covered by existing O&M activities, post-construction O&M requirements in the Proposed Project area will be reduced.

The Proposed Project may pose a fire hazard if vegetation or other obstructions are ignited by vehicles or equipment utilized during O&M activities. However, SDG&E will follow standard fire prevention practices and conduct a majority of the O&M activities along paved, existing roads where the risk of igniting vegetation is generally low. As previously described, SDG&E will also implement its existing Operations and Maintenance Wildland Fire Prevention Plan during O&M activities. Based on the implementation of the practices and plans described in this section and the overall reduction in post-construction O&M requirements in the Proposed Project area, O&M of the Proposed Project will result in no impact to the risk of loss, injury, or death involving wildland fires.

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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