5.8 Hazards and Hazardous Materials

This section addresses issues related to environmental hazards and hazardous materials in the existing conditions. Environmental hazards include accidental spills of hazardous materials, the presence of existing subsurface contamination, the risk of wildfire, and aircraft safety. Hazardous materials include fuel, oil, and lubricants. If encountered, contaminated soil can pose a health and safety threat to workers or the public.

Electromagnetic Fields

Electric voltage and electric current from transmission lines create electromagnetic fields (EMF). Possible health effects associated with exposure to EMF have been the subject of scientific investigation since the 1970s, and there continues to be public concern about the health effects of EMF exposure. However, EMF is not addressed here as an environmental impact under CEQA. The CPUC has repeatedly recognized that EMF is not an environmental impact to be analyzed in the context of CEQA because (1) there is no agreement among scientists that EMF does create a potential health risk, and (2) there are no defined or adopted CEQA standards for defining health risks from EMF.

Section 2.9 provides greater detail regarding EMF and lists PG&E's "no cost" and "low cost" magnetic field reduction steps in the design of the proposed substation in accordance with Section X(A) of GO 131-D, CPUC Decision No. D.06-01-042 and PG&E's EMF Design Guidelines.

Applicable Regulations

Hazardous substances are defined by federal and State regulations that aim to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and also in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261, which provides the following definition:

A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.

For this analysis, soil that is excavated from a site containing hazardous materials would be considered a hazardous waste if it exceeded specific CCR Title 22 criteria or criteria defined in CERCLA or other relevant federal regulations. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials occurs; it may also be required if certain other activities occur. Even if soils or groundwater at a contaminated site do not have the characteristics required to be defined as hazardous wastes, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

Federal

The federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the U.S. Environmental Protection Agency (EPA) for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste.

RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

CERCLA, including the Superfund program, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

State

The California Environmental Protection Agency (Cal/EPA) was created in 1991, which unified California's environmental authority in a single cabinet-level agency and brought the Air Resources Board (ARB), State Water Resources Control Board (SWRCB), Regional Water Quality Control Boards (RWQCBs), Integrated Waste Management Board (IWMB), DTSC, Office of Environmental Health Hazard Assessment (OEHHA), and Department of Pesticide Regulation (DPR) under one agency. These agencies were placed within the Cal/EPA "umbrella" for the protection of human health and the environment and to ensure the coordinated deployment of State resources. Their mission is to restore, protect and enhance the environment, to ensure public health, environmental quality, and economic vitality.

The California Hazardous Waste Control Law (HWCL) is administered by Cal/EPA to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the EPA approves the California program, both the State and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous; establishes criteria for identifying, packaging and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal and transportation; and identifies some wastes that cannot be disposed of in landfills.

Department of Toxic Substance Control (DTSC) is a department of Cal/EPA and is the primary agency in California that regulates hazardous waste, cleans-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code. Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337-340). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

Title 14 California Code of Regulations Sections 1250 1258, Fire Prevention Standards for Electric Utilities provides clearance standards for electric poles and tower firebreaks and electric conductors. The California Public Utilities Commission (CPUC) General Order 95, Rules for Overhead Electric Line Construc-

tion Section 35, covers all aspects of design, construction, operation, and maintenance of electrical power lines and fire safety hazards and establishes the minimum clearances between line conductors and vegetation under normal conditions in Table 1, Cases 13 and 14.

Local

The Proposed Project is located within Merced County; however, the CPUC has exclusive jurisdiction over the design, siting, installation, operation, maintenance, and repair of electric transmission facilities, pursuant to Article XII, Section 8 of the California Constitution. Therefore, the Proposed Project is not subject to local discretionary regulations. However, as part of the CEQA impact assessment, this analysis addresses the compatibility of the Proposed Project with local policies.

Merced County's Emergency Operations Plan addresses the planned response to major emergency situations associated with natural disasters, technological incidents, weapons of mass destruction, and national security emergencies in or affecting the County of Merced. This plan includes a discussion of hazardous materials (Merced County, 2007). Merced County has also adopted a Hazardous Waste Management Plan and Hazardous Materials Area Plan as part of its General Plan (Merced County, 1989; Merced County, 2011). The Plans require compliance with state and federal laws safety standards, coordination with the California Highway Patrol during waste transport, compatible adjacent land uses, and protection of soil and water. The City of Livingston has not adopted an individual emergency response and evacuation plan.

The San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4002 follows the National Emission Standards for Hazardous Air Pollutants (NESHAP), an EPA regulation that addresses asbestos and several other hazardous air pollutants. It covers several activities that could potentially cause the release of asbestos fibers into the air, including demolition and renovation projects. NESHAP requires that a thorough inspection for asbestos be conducted before any regulated facility is demolished or renovated. Inspections must be conducted and must include the collection and microscopic analysis of samples of all materials that might contain asbestos. Consultants who perform inspections must be certified by Cal-OSHA and provide a written report containing the inspection results. A written notification to SJVAPCD is required 10 days before the project begins (SJVAPCD, 2012)

5.8.1 Environmental Setting

The Proposed Project is located in Merced County, California, between the City of Livingston and Cressey. Primary land uses along the 14.4-mile ROW are agricultural and rural-residential. Most of the project alignment would be located along active roads and highways. SR-99 is the main roadway in the project area. The project route intersects SR-99 and the Southern Pacific Railroad (SPRR) southeast of the City of Livingston. It intersects the Burlington Northern Santa Fe (BNSF) railroad northeast of the City of Livingston near the community of Cressey.

The Merced River passes in a generally east-west direction approximately 800 feet north of the Gallo Substation at an elevation approximately 15 feet below the Gallo Substation. The Cressey Substation, located approximately 10 miles northeast of the Gallo Substation, is located approximately 3,000 to 4,000 feet south of the Merced River. The project route intersects Livingston Canal between Mercedes Avenue and Eucalyptus Avenue. Numerous other smaller irrigation canals cross or extend parallel to the project route (PG&E, 2011).

No schools are within 0.25 miles of the project site. No public airports or private airstrips are within 2 miles of the project site (AirNav, 2012).

There are two pipelines that convey hazardous materials located in the vicinity of the project alignment. PG&E owns and operates a natural gas pipeline that crosses the project alignment west of SR-99 (FRA, 2011). Kinder Morgan owns and Santa Fe Pacific Pipeline Partners operates a refined products pipeline that crosses the project alignment east of SR-99 (FRA, 2011).

Hazardous Material Sites

A review of the State Water Resources Control Board (SWRCB) Geotracker database indicates that there are four hazardous waste cleanup sites located within 0.5 miles of the project area. Two of these sites are closed cases, completed in 1996 and 2003. The other two sites, Nakashima Farms Composting and Livingston Winery Compost, remain open, but the SWRCB does not provide information on potential contaminants or the reason for their listing (SWRCB, 2012).

A report was obtained from Environmental Data Resources Inc. (EDR) and reviewed to screen for nearby hazardous sites and Recognized Environmental Concerns (RECs) along the project route. The American Society for Testing and Materials (ASTM) standard for Phase I Site Assessment Process E-1527-05 identifies RECs as "the presence or likely presence of any hazardous substance or petroleum products on a property under conditions that indicate an existing release, past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." The EDR report (EDR, 2011) included twelve sites that are potentially located along the project route and a number of other sites adjacent to or within one mile of the project route. Of those sites along the project route, most are listed by EDR because of historical or currently permitted underground storage tanks (USTs) on the property, several are listed because they maintain wastewater discharge permits, and one (5679 Arena Way) is listed as a clandestine drug laboratory that was closed in 2004.

Based on agricultural use, there is potential for the presence of pesticides and herbicides in soil along the project route. Petroleum products and other related chemicals may also be present in soil, especially where the project site intersects SR-99, the SPRR, and the BNSF railroad. None of these are designated RECs. None of the off-site properties listed in the EDR report were identified as potential RECs for the project route.

Fire Hazards

The project is not adjacent to wildlands and does not lie within a fire hazard zone as identified by the Merced County General Plan (Merced County, 2011).

Applicant Proposed Measures

PG&E proposes to implement measures during the design, construction, and operation of the Proposed Project to ensure it would occur with minimal environmental impacts in a manner consistent with applicable rules and regulations. Applicant Proposed Measures (APMs) are considered part of the Proposed Project in the evaluation of environmental impacts. CPUC approval would be based upon PG&E adhering to the Proposed Project as described in this document, including this project description and the APMs, as well as any adopted mitigation measures identified by this Initial Study (see Table 5.8-1).

APM Number	Issue Area						
Hazards and Hazardous Materials							
APM HM-1	Hazardous Substance Control and Emergency Response. PG&E will implement its hazardous substance control and emergency response procedures as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of project construction through operation. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they will be managed in accordance with all applicable regulations. Material safety data sheets will be maintained and kept available on site, as applicable.						
	Project construction will involve soil surface blading/leveling, excavation of up to several feet, and augering to a maximum depth of 20 feet in some areas. No known soil contamination was identified within the project site. In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil will be tested, and if contaminated above hazardous waste levels, will be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.						
	All hazardous materials and hazardous wastes will be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:						
	 Proper disposal of potentially contaminated soils. 						
	 Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. 						
	Emergency response and reporting procedures to address hazardous material spills.						
	 Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit. 						
	PG&E will complete its Emergency Action Plan Form as part of project tailboard meetings. The purpose of the form is to gather emergency contact numbers, first aid location, work site location, and tailboard information.						
Traffic and Transportation							
APM TT-1	Traffic Management Implementation. PG&E will follow its standard safety practices, including installing appropriate barriers between work zones and transportation facilities, posting adequate signs, and using proper construction techniques. PG&E will coordinate construction traffic access at Gallo Substation with Gallo Winery during the E. & J. Gallo Winery Eastside Expansion Project construction. PG&E is a member of the California Joint Utility Traffic Control Committee, which published the <i>California Joint Utility Traffic Control Manual</i> (2010). PG&E will follow the recommendations in this manual regarding basic standards for the safe movement of traffic on highways and streets in accordance with Section 21400 of the CVC. PG&E will comply with all notification requirements as prescribed by County of Merced and Caltrans encroachment permits.						

Table 5.8-1. Applicant Proposed Measures (APMs) Related to Hazards and Hazardous Materials

5.8.2 Environmental Impacts and Assessment

HAZARDS AND HAZARDOUS MATERIALS Would the project:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
а.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
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?				

HAZARDS AND HAZARDOUS MATERIALS Would the project:		Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Emit hazardous emissions or handle hazardous or acutely haz- ardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				\boxtimes
Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				\boxtimes
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				\boxtimes
For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				\boxtimes
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			\boxtimes	
Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
	Emit hazardous emissions or handle hazardous or acutely haz- ardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed	ImpactEmit hazardous emissions or handle hazardous or acutely haz- ardous materials, substances, or waste within one-quarter mile of an existing or proposed school?Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Impact Incorporated Emit hazardous emissions or handle hazardous or acutely haz- ardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? 	Impact Incorporated Impact Emit hazardous emissions or handle hazardous or acutely haz- ardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Impact Impact Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? Impact Impact For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? Impact Impact For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? Impact Impact Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Impact Impact Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? Impact Impact

Significance criteria established by CEQA Guidelines, Appendix G.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

LESS THAN SIGNIFICANT IMPACT – CONSTRUCTION. The use of hazardous materials during project construction would be minimal. Hazardous materials may include gasoline, diesel fuel, hydraulic oils, equipment coolants, and any generated wastes that may include these materials. These materials are considered hazardous because they are flammable and/or contain toxic compounds, such as volatile organic compounds and heavy metals. Wastes considered hazardous by the State of California would be transported and disposed of according to applicable federal, state, and local regulations, as described above under Applicable Regulations. Fueling and routine maintenance of equipment and vehicles would be performed off site to the greatest extent feasible; on-site fueling would represent a less-than-significant impact with implementation of APMs.

Wooden poles would be removed from the project area during construction and disposed of as hazardous waste. The wooden poles have been treated with a wood preservative that contains hazardous compounds such as polycyclic aromatic hydrocarbons. Poles would be immediately transported off site by a qualified hazardous waste hauler once removed from the ground. Wooden poles would be collected in project-specific containers at a PG&E service center designated as a PG&E consolidation site. As containers are filled, poles would be transported to an appropriate licensed Class I or Class II landfill or the composite-lined portion of a solid waste landfill. A total of 170 wooden poles would be disposed of at a licensed facility. The transport and disposal of the poles would not pose a significant hazard to the environment or the public.

PG&E would remove the existing 80-foot-tall lattice steel tower and telecommunications control building of the Cressey Substation. These removed materials may contain asbestos. As stated in the project description, PG&E would submit a notification to SJVAPCD 10 days prior to the removal of these facilities, in compliance with Rule 4002. Compliance with the following additional requirements of Rule 4002 would ensure impacts remain less than significant:

- Conduct an asbestos inspection by a certified Cal-OSHA consultant and provide a written report.
- If asbestos is present, train employees or hire Cal-OSHA certified contractors for asbestos removal. Remove asbestos-containing materials under controlled conditions prior to demolitions so that asbestos fibers are not released into the air.
- Seal asbestos-containing waste materials in leak-tight, properly labeled containers and disposed of only at approved sites.

APM HM-1 (Hazardous Substance Control and Emergency Response) would reduce potential impacts associated with hazardous material transport, use, and disposal during construction. APM HM-1 requires PG&E to implement its existing hazardous substance control and emergency response procedures. The Cressey and Gallo Substations have existing Hazardous Materials Business Plans that are site-specific and would be required during construction. CPUC has reviewed these existing plans to ensure that thorough reporting and recordkeeping for hazardous materials is required. The Hazardous Materials Business Plans include a list of training that personnel receive including evacuation procedures, emergency incident reporting, and external emergency response notification. Chemical handlers receive additional training on hazardous substance control and emergency response procedures. With implementation of APM HM-1 and existing HMBPs, project construction would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

LESS THAN SIGNIFICANT IMPACT – OPERATIONS AND MAINTENANCE. Other than substances associated with motor vehicles that would be used for annual line inspection and the sulfur hexafluoride (SF6) used to insulate the new breakers, no hazardous materials are associated with maintenance and operation of the project. The existing substations include transformers, which use mineral oils, and breakers, which use SF6. Aside from the SF6 used in the new breakers, no additional or new impacts are anticipated to occur as a result of the substation expansion and modification. Implementation of APM HM-1, Hazardous Substance Control and Emergency Response, and APM AQ-3, Avoid Sulfur Hexafluoride Emissions, would further reduce the small risk of minor exposures of the environment, the public, or site workers to potentially hazardous materials during project operation and maintenance. PG&E would implement existing operation and maintenance policies to address hazardous materials use after the project construction is complete. Impacts associated with the transport, use, and disposal of hazardous materials would be less than significant.

b. Would the project 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?

LESS THAN SIGNIFICANT IMPACT – CONSTRUCTION. Construction vehicles and equipment contain substances such as gasoline, diesel, antifreeze, and lubricants that, if accidentally released to the environment, could be hazardous. APM HM-1 and existing Spill Prevention, Control, and Countermeasure requirements would reduce potential impacts by requiring the development and implementation of hazardous substance control and health and safety measures. Specific measures include, but are not limited to the following, as described in APM HM-1:

Proper disposal of potentially contaminated soils according to applicable federal, state and local regulations and standards.

- Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources.
- Emergency response and reporting procedures to address hazardous material spills.
- Stopping work at hazardous material spill location(s) and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work would be resumed at the location(s) after any necessary consultation and approval by the Hazardous Materials Unit.
- BMPs, as identified in the project SWPPP and Erosion Control and Sediment Transport Plan, would be implemented to minimize the risk of an accidental release and to provide the necessary information for emergency response.

As noted above, historical or currently permitted USTs are located on properties that would be crossed by the project (EDR, 2011). As stated in the project description, if the USTs or aboveground storage tanks (ASTs) would be crossed by the project route and the route cannot be adjusted to avoid disturbance, the tanks would be removed prior to project construction or segregated from the work area and not disturbed. If it is determined that removal of tanks is necessary, a separate workplan describing the proper decommissioning and removal of the tanks and removal of any associated impacted soil would be prepared prior to removal as required by CCR, Title 23, Division 3, Chapter 16, UST Regulations. As a result of these actions, impacts related to USTs or ASTs would be less than significant.

Underground pipeline facilities are located beneath the project alignment. Heavy equipment, vehicles, and ground disturbing activities (e.g., grading or augering holes) could cause pipeline damage or rupture, which could result in the uncontrolled release of hazardous materials and/or cause a fire or explosion. PG&E implements standard measures to avoid damaging pipelines during construction including, but not limited to, field marking horizontal locations of gas facilities as recommended by the Underground Service Alert. PG&E would comply with standards and regulations of the Pipeline and Hazardous Materials Safety Administration, the CPUC, and the National Transportation Safety Board (PG&E, 2012). As a result, impacts to underground pipelines would be less than significant.

LESS THAN SIGNIFICANT IMPACT – OPERATIONS AND MAINTENANCE. In agricultural areas, aerial spraying (crop dusting) is used to control insects, weeds, and diseases. Where power and transmission lines exist in an agricultural area, pilots fly over, beside, and even under transmission lines to spray agricultural land with various products, usually pesticides. General civic aviators are required to distance themselves from the ground or other objects by at least 500 feet. However, crop dusters operate under a waiver that allows them to travel near power lines and close to the ground surface. The high numbers of accidents associated with crop dusters can partly be attributed to flying at low altitudes and high speeds with the additional possibility of crashing into obstacles, such as power lines, trees, and sometimes buildings within the flight area. Many crop duster accidents are not reported unless they resulted in an injury or fatality. Of the California-wide crop dusting crashes reported August 2011 through August 2012, between, 33 percent were a direct result of having struck a power line or an associated tower/pole. Over the past five years, 21% of aerial application crashes in California have resulted from impacts with power lines or towers/poles (AOPA, 2012).

The primary reason that power lines and poles are a safety hazard for aerial applicators is because they present an additional obstacle for pilots to avoid. New power lines are especially hazardous when they are: diagonally oriented, relative to field boundaries; exist side-by-side with other transmission lines; create an angle perpendicular to an existing line; constructed within a new utility ROW; and when they are not clearly visible.

The project is located in an agricultural area with the potential for aerial spraying of crops and orchards. However, this impact is considered to be a less than significant impact due to the existence of existing distribution lines along most of the route and the orientation of the route along roadways and property and agricultural operations boundaries. The airplane pilots would be aware of the existing distribution lines along the route and would know to adjust their routes to avoid the existing lines. Because the route would follow along roadways and property and agriculture operations boundaries, the pilots would be more inclined to avoid these areas. Additionally, this less-than-significant impact would be further reduced with implementation of MM AG-1 (Coordinate with landowners, farmers, and ranchers regarding construction activities) and APM LU-1 (Agriculture Impacts Avoidance and Compensation). Through these measures, PG&E would coordinate construction activities with agricultural landowners, and thus they would be aware of the construction of the new 115 kV line and could warn aerial applicator pilots.

PG&E's operation and maintenance policies currently applied to the Cressey and Gallo Substations and connected power lines that address the potential release of hazardous materials in upset or accident conditions would be implemented after the project is complete. These plans ensure a thorough record-keeping of hazardous materials and provide site-specific recommendations for spill prevention and emergency response procedures and would ensure impacts are less than significant. Implementation of the procedures specified in APM HM-1 would further reduce the less-than-significant impact.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

NO IMPACT. Project activities would not emit hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school; therefore, no impact would occur.

d. Would the project 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, would it create a significant hazard to the public or the environment?

NO IMPACT. A review of information obtained from the SWRCB (Geotracker) and DTSC (Envirostor) databases (SWRCB, 2012; DTSC, 2012) indicates that the project area would not be located on a known hazardous material site pursuant to Government Code Section 65962.5.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

NO IMPACT. The project would not be located within an airport land use plan or within two miles of an airport; therefore, no impact would occur.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No IMPACT. The project is not known to be located within two miles of a private airstrip; therefore, no impact would occur.

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

LESS THAN SIGNIFICANT IMPACT. Road closures may be necessary for project construction but are not expected to exceed five minutes in duration. APM TT-1 (Traffic Management Implementation), which is also discussed in Section 5.16 (Transportation and Traffic), would require PG&E to follow the recommen-

dations published in the *California Joint Utility Traffic Control Manual* (2010) regarding basic standards for the safe movement of traffic on highways and streets. Recommendations include developing a Traffic Control Plan and coordination with local emergency personnel who organize the traffic response in case of an emergency. Implementation of APM TT-1 would reduce impacts to emergency access in the project area to a less than significant level.

The project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Impacts would be less than significant. Additional information on project impacts to emergency vehicle access is provided in Section 5.16, Transportation and Traffic.

h. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

NO IMPACT. The project would not be adjacent to wildlands and would not expose people or structures to a significant risk involving wildland fires. The project site does not lie within a fire hazard zone as identified by the Merced County General Plan. No impact would occur.