

# Chapter 11—Hazards and Hazardous Materials

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## 11.1 Introduction

This chapter discusses potential hazards to public and worker health and safety associated with the construction and operation of the Project, including potential fire hazards and hazardous substance impacts. The Project will not result in significant public health and safety impacts.

### 11.1.1 Methodology

An environmental data report was obtained from Environmental Data Resources (EDR). The report identifies sites of potential soil and/or groundwater contamination registered on several agency lists. The sites identified for this analysis lie within specified distances of the proposed construction routes, as indicated below. The executive summary of the report and Focus Maps provided by EDR are found in Appendix E and show the locations of all the sites identified for this analysis. Using the EDR report, CH2M HILL performed a review in order to determine where potential or existing contamination could be encountered during construction of the Project. Sites deemed potential areas of concern were identified on one or more of the following lists:

- National Priority List (NPL) (within one mile of the Project route)
- Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) (within one mile of the Project route)
- California Hazardous Material Incident Report System (CHMIRS) (within one quarter-mile of the Project route)
- California DTSC's Annual Work Plan (AWP) (within one mile of the Project route)
- California DTSC Sites (Cal-Sites) (within one quarter mile of the Project route)
- Cortese List (contaminated drinking water wells) (within one quarter-mile of the Project route)
- Waste Management Unit Database System (WMUDS/SWAT) (within one quarter-mile of the Project route)
- Leaking Underground Storage Tank (LUST) (within one quarter-mile of the Project route)
- California Regional Water Quality Control Board sites (Cal SLIC) (within one quarter-mile of the Project route)

## 11.2 Existing Conditions

### 11.2.1 Contaminated Soil/Groundwater Sites

Listed sites within 1-1/2 miles of the Project route that may have the potential to affect soil and/or groundwater in the Project corridor are listed in Appendix E. An explanation of agency list nomenclature is shown in Appendix E. Potential areas of concern are highlighted in blue in the Focus Maps in Appendix E.

A total of 83 contaminated sites were identified in the EDR report within 1-1/2 miles of the preferred alignment as having the potential to affect public and construction worker health and safety. These sites listed in Appendix E contain soil and/or groundwater contamination. The distribution of these sites along the preferred alignment is shown in Table 11-1.

TABLE 11-1  
Distribution of Contaminated Sites

Segment	Number of Adjacent Sites
Segment 1 - Overhead	11
Segment 1 - Underground	16
Segment 2	35
Segment 3	3
Segment 4, Route Option 4a	4
Segment 5	14

As seen in the table above, the majority of the contaminated sites are located along Segments 1, 2 and 5. Segment 1 is a long segment, with the majority of the construction along this segment above-ground. As a result, the number of listed sites per mile of transmission line is much smaller for Segment 1 than for Segments 2 and 5, reducing the likelihood of encountering contamination during excavation. Additionally, for the above-grade section of Segment 1, excavation will be for individual tower footings and therefore limited in extent. The limited footing excavations will also reduce the likelihood of encountering contamination in soil during excavation along the above-ground portion of Segment 1.

All of the contaminated sites identified in Segment 2 were located along San Bruno Avenue, El Camino Real, and/or the San Francisco Bay Area Rapid Transit (BART) right-of-way (ROW); no contaminated sites were identified along the proposed McLellan Drive extension in Segment 3. Segment 2 includes the placement of most of the new 230 kV line underground in a trench within the new BART SFO Extension ROW. Trenching within the BART SFO Extension ROW will generally be through uncontaminated soils placed there as a result of the BART SFO Extension soil-management policies (e.g., removal of contaminated soil and placement of clean soil along the ROW). Contaminated groundwater may, however, be encountered during this trenching operation.

Most of the contaminated sites identified in Segment 5 are located along Bayshore Boulevard, near the Martin Service Center and Substation. Contaminated soil and/or groundwater may be encountered during excavations in this area, as it may be encountered near sites identified for Segments 3 and 4.

The majority of the potential areas of concern along the route are leaking underground storage tanks, primarily associated with gasoline stations. Consequently, soils in the vicinity of these areas potentially contain varying amounts of various petroleum hydrocarbons (e.g., gasoline, diesel) and fuel additives such as methyl tertiary butyl ether (MTBE). The data report also indicates that soil at some of these sites may also be impacted by solvents, tanning sludge, isopropyl alcohol, mercury compounds, and/or sulfuric acid.

A number of sites with known groundwater contamination are also located within 1-1/2 miles of the preferred construction alignment. The majority of these potential areas of concern are leaking underground storage tanks, primarily associated with gasoline stations. Consequently, groundwater in the vicinity of these sites potentially contain varying amounts of various petroleum hydrocarbons (e.g., gasoline and diesel) and fuel additives such as MTBE. The data search performed also indicates that groundwater at some of these sites may also be impacted by solvents, tanning sludge, isopropyl alcohol, mercury compounds, and/or sulfuric acid.

The database search indicates that two landfills or waste management units lie in the general vicinity of the proposed alignment. These waste management units are the Hillside Landfill (located at 1500 Hillside in Colma) and at Vallejos Auto Body and Paint (located at 1269 San Mateo Avenue in San Bruno). The Hillside Landfill is listed as a Class III disposal site that is currently accepting construction and demolition wastes, green materials, inert materials, and metals. The landfill is located at 1500 Hillside Boulevard in Colma and is owned and operated by Cypress-Amloc Land Company, Inc. The site also contains the San Mateo County Hazardous Waste facility. This site is located adjacent to the Segment 3 alignment.

The Vallejos Auto Body and Paint shop is listed as containing a waste-management unit. This site is listed as an undisclosed location on San Mateo Avenue, but the mailing address for the site's owner, Jamie Vallejo, is 1269 San Mateo Avenue in San Bruno. No information is provided about the site's waste-management unit, though the site is listed as recycling unspecified solvent mixtures. This site is located 1/8 mile east of Segment 2, near where the BART tracks cross Highway 380.

The proposed Project includes modifications to seven existing PG&E substations (Martin, Carolands, Hillsdale Junction, Ralston, Monta Vista, San Mateo, and Jefferson substations). These modifications include the addition of breakers and taps, removal, relocation or addition of electric equipment, grading for preparation of equipment installation, or expansion of the existing fence line and relocation of existing roadways involving grading, as described in Chapter 2, Project Description. Soil and/or groundwater contamination may exist at one or more of these substations from the accidental release of onsite chemicals or from historical site uses.

In determining which sites pose a greater risk to the Project, the following site characteristics need to be considered:

- **Site density:** the more listed sites in the area, the greater the risk of encountering contamination.
- **Type of contamination:** Disposal and/or reuse of soil and/or groundwater containing petroleum compounds is typically easier to manage than when it contains other chemicals. Chemical constituents vary considerably in their toxicity and ability to migrate through the subsurface.
- **Type of release and media affected:** Most contaminants migrate more readily in groundwater than in soil. The volume of contaminant released, release date, and media affected all affect how far contaminants have migrated and therefore their potential to impact the Project.
- **Intervening actions:** Intervening actions (e.g., remedial actions) have considerable effect on the migration of contaminants and therefore their potential to impact the Project.

As a result, it is recommended that the following additional tasks be performed once the Project moves further along in the design stage:

- Agency file review for sites adjacent to the CPUC-approved alignment (Appendix E)
- Windshield survey
- Aerial photo review
- Sanborn Fire Insurance map review
- Phase II soil and/or groundwater sampling

In addition, during review of the EDR report, it appeared that the listed location of several sites appeared different than their location as shown on the Focus Maps. Therefore, the location of any potential site should be verified prior to conducting a Phase II investigation.

## 11.2.2 Hazardous Materials

During construction and operation of the Project, hazardous materials, as defined under various federal and state environmental laws, will be used, stored, handled, and disposed of. In the past, several chemicals used at substations have been considered by PG&E to be hazardous materials, however, recent decisions by the California's regulatory agencies have made clear that mineral oil, sulfur hexafluoride gas, and the chemicals found in substation batteries are not considered hazardous materials.

For the Project, the following hazardous materials may be encountered during construction.

### 11.2.2.1 Automotive Fuels, Lubricants, and Antifreeze

During Project construction and operation, motorized vehicles will be used on the Project site. These vehicles contain numerous substances that, when released, could constitute a hazardous substance. These substances include gasoline, diesel, antifreeze, automotive lubricants, and motor oil. The refueling and maintenance of these vehicles must be considered during Project staging and operation.

### 11.2.2.2 Contaminated Soil and/or Groundwater

Contaminated soil and/or groundwater may be encountered during construction along the preferred alignment or in one of the existing substations. If these materials are removed from their present location, they may be reclassified as a hazardous material if chemical concentrations exceed state and federal limits for characterizing materials as hazardous substances. A number of sites with known soil and/or groundwater contamination are located along the preferred construction alignment, the majority of which are associated with leaking underground storage tanks. Soils and/or groundwater in the vicinity may contain varying amounts of various petroleum hydrocarbons (e.g., gasoline and diesel) and fuel additives such as MTBE. The EDR data report also indicates that soil and/or groundwater at some of the sites along the preferred construction corridor may also be impacted by solvents, tanning sludge, isopropyl alcohol, mercury compounds, and/or sulfuric acid.

### 11.2.3 Fire Hazard Potential, Jurisdictions and Regulatory Framework

Several factors are associated with the potential for fire hazards in the Project Area, including weather, fuel load and distribution, and accessibility of emergency fire equipment to the Project Area. In general, the coastal influence in the Project Area results in moisture-laden air and moderate temperatures, which limit ignition potential. High wind speeds that are experienced in the Project Area, however, can be problematic during fire-suppression situations (ESA 1994).

As described in Chapter 5, Land Use, Recreation, and Agricultural Resources, and Chapter 6, Biological Resources, the overhead portion of Segment 1 for the Project contains expanses of undeveloped lands, predominated by grasslands interspersed with shrubs and tree stands. Within the overhead portion of Segment 1, undeveloped lands abut residential areas. As described in Chapter 2, Project Description, approximately 14.6 miles of the existing overhead transmission line to be replaced are within Edgewood County Park SFPUC Watershed lands. The SFPUC Watershed Management Plan addresses fire risk and severity, as well as control and suppression implemented within watershed lands.

The remainder of the Project Area is generally characterized by urban development and installation of the underground transmission line within an existing asphalt roadway, surrounded by residential, commercial, and utility development.

Within the Project Area, fire-suppression response is provided by the local city fire departments in the incorporated cities and populated areas, as described in Chapter 12, Population and Housing, Public Services, and Utilities and Service Systems. The watershed and unincorporated areas of San Mateo County are served by the California Department of Forestry and Fire Protection (CDF), San Mateo and Santa Cruz Unit (Wert 2002).

Fire-suppression capabilities required for activities similar to the proposed Project are contained with Public Resource Code (PRC) Sections 4251–4290 (Wert 2002), the Uniform Fire Code, and local ordinances. As part of its compliance with these regulations, PG&E cooperates with the CDF and local fire departments by performing regular maintenance inspections on the existing overhead transmission line in Segment 1 to ensure trees do not contact the transmission facilities.

## 11.2.4 Helicopter Use in Populated Areas

Several different types of helicopters will be used during the construction of this line. Large helicopters (“skycranes”) will be used for the removal of existing towers and installation of new towers; and small helicopters will be used for conductor removal and installation within the overhead portion of Segment 1 (refer to Appendix A, Project Description and Engineering Information).

The Federal Aviation Administration (FAA) requires a Lift Plan for use of helicopters in populated areas. The Lift Plan includes identification of helicopter staging areas and flight paths with the least potential to affect populated areas within the distances specified by FAA. At elevations where damage from downdraft can occur, FAA regulations require that a skycrane cannot fly within 150 feet laterally of an occupied structure, including homes, buildings, and roads. A loaded skycrane (i.e., one carrying equipment or material) cannot fly within 300 feet laterally of an occupied structure. Structures are required to be unoccupied if the required distances can not be maintained during the flight.

As currently planned, it is anticipated that flightpaths for the Project will not require residents to vacate their homes. Should final construction plans and the Lift Plan conclude otherwise, a small number of homes may need to be vacated for a short period of time.

Additionally, it is anticipated that freeways and local road closures and trail will be needed to enable flight operations (refer to Chapter 13, Transportation/Traffic for further discussion of closure of highways and roads during helicopter operations).

## 11.3 Potential Impacts

### 11.3.1 Significance Criteria

According to Appendix G of the revised CEQA Guidelines, the Project would have a significant impact if it created a hazard to public health or the environment through the transport, use, or disposal of hazardous materials, in addition to the exposure to persons or the environment to an increased risk of air-traffic related hazards or fire hazards.

### 11.3.2 Construction Impacts

**Impact 11.1: Potential to Encounter Hazardous Substances.** Prior to construction, areas potentially impacted with contaminants will be investigated and sampled, the constituents of concern identified, and any impacts delineated in a Phase II Environmental Assessment. Worker awareness training will be required for all potentially exposed workers. A Health and Safety Plan will be written and implemented for protecting site workers and neighbors, and may include perimeter air monitoring where necessary, based on the results of the Phase II Environmental Assessment and the judgement of a Certified Industrial Hygienist. During construction, any hazardous substances encountered will be handled in accordance with best management practices to be prescribed in the Project’s Stormwater Pollution Prevention Plan (SWPPP). Preparation of a SWPPP is required by the Regional Water Quality Control Board in compliance with the National Pollutant Discharge Elimination System under the federal Clean Water Act (see Chapter 9, Hydrology and Water Quality).

A Hazardous Substances Control and Emergency Response Plan will be prepared and implemented to address the identification of any potentially hazardous substances that are unexpectedly encountered during construction and to direct the cleanup of any accidental spills that may occur during construction. Any hazardous waste generated during construction activities will be disposed of in accordance to a Waste Management Plan and all local, state, and federal regulations and guidelines. Implementation of these standard measures as part of the Project would reduce potential impacts to a less-than-significant level, and therefore, mitigation is not required.

Implementation of Mitigation Measures 11.1, 11.2, 11.3, 11.4, and 11.5 would mitigate potential worker exposure to contaminated materials and the potential spread of contamination by disposing of soil or groundwater at other locations. These five mitigation measures would reduce impacts to less-than-significant levels.

**Impact 11.2: Potential Fire Hazard During Construction.** The greatest potential fire hazard for the Project is the use of internal-combustion engines or sparking equipment in grass-covered areas within Segment 1. Grass-covered areas within Segment 1 include the unpaved access roads to the existing and new tower sites that will be built by conventional methods, the cable-pulling sites and the construction staging areas. Fire hazard for the installation of the underground portion of Segment 1 and Segments 2 through 5 is relatively minimal because the use of ICEs and sparking equipment would generally take place within a paved roadbed.

The use of internal-combustion engines on the grass-covered areas, including driving construction trucks and equipment on grass, could cause ignition. However, the use of spark-arrestors on all internal combustion engines, as required by CDF and local ordinances, will reduce the risk of ignition in the grass-covered areas.

Work that involves flame, arcing or sparking equipment (e.g., welding, torch, grinder, and cut off saw) at the construction staging areas during construction of towers or support structures could potentially result in the combustion of native materials located close to the welding site. However, before welding activities commence, it is PG&E's standard procedure, in accordance with CDF requirements, to select a welding site that is void of native combustible material and/or clear the site of such material for 10 feet around from where the work will be performed, to minimize the fire hazard. At the welding site, an appropriately sized water-type fire extinguisher (Class A, or other Class as conditions require) will be available for use during the duration of the work. Prior to performing welding at the substations, PG&E or its contractor would obtain a welding permit with the State Fire Marshall or local fire department.

In accordance with the most recent edition of the Uniform Fire Code Section 1109.5, and as part of standard construction practice, PG&E will inform its construction and maintenance workforce that lighted matches, cigarettes, cigars, or other burning objects must not be discarded in such a manner that could cause ignition of other combustible material. The construction and maintenance workforce will be informed that for all fires, 911 should be called. Construction and maintenance workforce will be trained in the proper use of each type of fire extinguisher used for the Project.

Because fire conditions can change daily, the CDF or appropriate fire department jurisdiction will be consulted for specific fire-danger information based on the location of the work for the day.

Access to the appropriate fire-suppression equipment during construction will reduce the risk of fire hazards to the public or environment. Through development and implementation of a Fire Risk Management Plan, consistent with the PRC, the SFPUC Watershed Management Plan (applicable to overhead portion of Segment 1, only), the Uniform Fire Code, and local ordinances, PG&E will select and site the appropriate fire-suppression equipment to be used during construction for the Project.

The potential impacts of igniting fires could be significant, particularly for the overhead section of Segment 1; however, implementation of the practices described below (Mitigation Measure 11.6) will reduce the impact to less than significant and no further mitigation is required.

**Impact 11.3: Operation of “Skycrane” Helicopters in Populated Areas.** It is PG&E’s normal practice for operation of “skycrane” construction helicopters to develop and implement a Lift Plan for approval by FAA. The plan is developed in conjunction with the helicopter vendor. As noted above, PG&E does not presently anticipate that residents will be required to temporarily vacate their homes. In the unlikely event that final construction plans and the Lift Plan require otherwise, PG&E will coordinate with potentially affected residents to minimize the duration of the necessary work and any resulting inconvenience. Operation of the “skycrane” helicopters in populated areas can pose a significant risk to structures or persons; however, with implementation of the Lift Plan (Mitigation Measure 11.7), the risk will be less than significant.

### 11.3.3 Operation Impacts

**Impact 11.4: Potential Hazardous Substances Spills.** Although spills caused by transformer failure are rare in PG&E’s system, the substations will meet federal Spill Prevention, Control, and Countermeasures (SPCC) requirements, as outlined in Title 40 of the Code of Federal Regulations, Part 112. Any spilled oil would be properly characterized, collected, and transported to an approved disposal site in accordance with applicable requirements. Pursuant to U.S. EPA requirements, PG&E would inspect the equipment and any required spill containment facilities on a monthly basis. With implementation of these standard measures, impacts would be reduced to a less-than-significant level (also see Chapter 8, Impact 8.6).

The transition station, along with the existing substations, will be operated in compliance with all applicable federal, state, and local regulations. Implementation of Mitigation Measure 11.8 will reduce impacts from hazardous materials to a less-than-significant level.

**Impact 11.5: Potential Fire Hazard.** Transmission lines may pose a fire hazard when a conducting object, such as a tree limb, comes in close proximity to a line or when a live-phase conductor falls to the ground. However, PG&E clears potential proximate objects, such as trees, during construction and maintains clearance during the life of the transmission line to reduce the fire hazard potential. Tree trimming around power lines is governed by Rule 35 of CPUC General Order 95. This rule requires PG&E to maintain



minimum clearances between trees and power lines during all weather conditions. When preparing to trim trees for minimum clearances for public safety, PG&E considers tree growth, branch movement, and power-line sway during windy conditions, as well as line sag during periods of high temperatures and increased electric loads.

Conductors can be a fire hazard if they fall to the ground and create an electrical arc that ignites combustible material. During mechanical and structural design, selection of materials, and construction of transmission lines, PG&E takes into account normal and unusual structural loads such as ice and wind that can cause the conductors to break. PG&E installs high-speed relay equipment that senses a broken-line condition and actuates circuit breakers to de-energize the line in about one-tenth of a second. This procedure has proven to be a reliable safety measure and reduces the risk of fire to a less-than-significant level.

The potential for fires at the Martin, Ralston, and Jefferson Substations and Hillsdale Junction Switchyard, is low because a minimum distance of 25 feet between transformers and circuit breakers would be maintained. A minimum distance of 50 feet would be maintained between oil-filled equipment. New substation equipment would not substantially increase the risk of fire because the inherent design of the equipment (e.g., use of fire-resistant materials) reduces its susceptibility to fire. In addition, the protection equipment described in Chapter 2 maintains the equipment operating in safe parameters to reduce the likelihood of overheating and subsequent fires. Furthermore, equipment is inspected and maintained monthly, and a Fire Response Plan is in place with local fire-protection services. Potential impacts from fire hazards would be less than significant, and therefore, mitigation is not required.

## 11.4 Mitigation Measures

### 11.4.1 Construction Mitigation Measures

**Mitigation Measure 11.1: Environmental Training and Monitoring Program.** An environmental training program will be established to communicate environmental concerns and appropriate work practices, including spill prevention, emergency response measures, and proper Best Management Practice (BMP) implementation, to all field personnel. The training program will emphasize site-specific physical conditions to improve hazard prevention (e.g. identification of potentially hazardous substances) and will include a review of all site-specific plans, including but not limited to, the Project's SWPPP, Erosion Control and Sediment Transport Plan, Health and Safety Plan, Waste Characterization and Management Plan, Fire Response Plan, and Hazardous Substances Control and Emergency Response Plan.

A monitoring program will also be implemented to ensure that the plans are followed throughout the period of construction. Best Management Practices, as identified in the Project SWPPP and Erosion Control and Sediment Transport Plan, will also be implemented during the Project to minimize the risk of an accidental release and provide the necessary information for emergency response.

**Mitigation Measure 11.2: Hazardous Substance Control and Emergency Response Plan.** PG&E will prepare a Hazardous Substance Control and Emergency Response Plan, which will

include preparations for quick and safe cleanup of accidental spills. This plan will be submitted with the grading permit application. It will prescribe hazardous-materials handling procedures for reducing the potential for a spill during construction, and will include an emergency response program to ensure quick and safe cleanup of accidental spills. The plan will identify areas where refueling and vehicle maintenance activities and storage of hazardous materials, if any, will be permitted. These directions and requirements will also be reiterated in the Project SWPPP.

**Mitigation Measure 11.3: Emergency Spill Supplies and Equipment.** Oil-absorbent material, tarps, and storage drums will be used to contain and control any minor releases. Emergency-spill supplies and equipment will be kept adjacent to all areas of work and in staging areas, and will be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials will be provided in the Project's Hazardous Substances Control and Emergency Response Plan.

**Mitigation Measure 11.4: Phase II Soil Sampling/Waste Characterization.** Soil sampling and potholing will be conducted along the Project route and in substations, as needed, before construction begins, and soil information will be provided to construction crews to inform them about soil conditions and potential hazards. If hazardous substances are unexpectedly encountered during trenching, grading, or excavating work, work will be stopped until the material is properly characterized and appropriate measures are taken to protect human health and the environment. If excavation of hazardous materials is required, they will be handled, transported, and disposed of in accordance with federal, state, and local regulations.

Prior to initiating excavation activities and along the underground transmission-line routes, soil borings will be advanced to ensure that groundwater will not be encountered. The location, distribution, or frequency of such tests shall be determined to give adequate representation of the conditions in the construction area.

All soil sampling and hazardous waste-removal and handling will be conducted in accordance with the Project's Health and Safety Plan.

**Mitigation Measure 11.5: Groundwater Characterization.** If suspected contaminated groundwater is encountered in the depths of the proposed construction areas, samples will be collected and submitted for laboratory analysis of petroleum hydrocarbons, metals, volatile organic compounds, and semi-volatile organic compounds. If necessary, groundwater will be collected during construction, contained, and disposed of in accordance with all applicable regulations. Appropriate personal protective equipment will be used and waste management will be performed in accordance with applicable regulations. Non-contaminated groundwater will be released to one of the cities' stormwater drainage systems (with prior approval) or contained, tested, and disposed of by methods described above.

Appropriate personal protective equipment will be used during groundwater testing and dewater removal, and waste management and disposal will be performed in accordance with local, state, and federal regulations and per the Project's Health and Safety Plan and Waste Management Plan.

**Mitigation Measure 11.6: Fire Risk Management.** Prior to initiating construction, the Company will prepare a Fire Risk Management Plan to outline the potential for fires occurring as a result of Project construction, and to outline measures necessary to prevent fires. Additionally, fire suppression materials and equipment will be kept adjacent to all areas of work and in staging areas, and will be clearly marked. Detailed information for responding to fires will be provided in the Project's Fire Risk Management Plan.

Information contained in the Fire Risk Management Plan and the location of fire-suppression materials and equipment will be included as part of the employee environmental training discussed in Mitigation Measure 11.1.

**Mitigation Measure 11.7: Helicopter Lift Plan.** A Lift Plan will be prepared and approved by the FAA prior to all "skycrane" construction helicopter operations. As noted above, PG&E does not presently anticipate that residents will be required to temporarily vacate their homes. In the unlikely event that final construction plans and Lift Plan require otherwise, PG&E will coordinate with potentially affected residents (providing a minimum of 30 days notice) to minimize the duration of the necessary work and any resultant inconvenience.

The need for highway, roadway, and trail closures will be identified in the Lift Plan and will be coordinated with the appropriate jurisdictions as described in Chapter 13, Traffic/Transportation. Notification to the public of those temporary closures will be provided as described in Mitigation Measures 13.3 and 13.8.

#### 11.4.2 Operation Mitigation Measures

**Mitigation Measure 11.8: Spill Prevention, Control, and Countermeasures.** PG&E will prepare or update current Spill Prevention, Control, and Countermeasures (SPCC) plans for the transition station and each substation as appropriate, as outlined in Title 40 of the Code of Federal Regulations, Part 112.

With respect to the substations, PG&E will also update, as needed, and submit a revised Hazardous Materials Business Plan in accordance with Chapter 6.95 of the California Health and Safety Code and Title 22, California Code of Regulations. The plan and forms will be submitted to the appropriate Certified Unified Protection Agency (CUPA). The transition station, along with the existing substations, will be operated in compliance with all applicable federal, state, and local regulations.

## 11.5 References

- Dumas, Leslie. 2002. Personal communication with Katy Carrasco. September 10.
- Environmental Science Associates (ESA) 1994. Prepared for EDAW under contract to the San Francisco Water Department. *San Francisco Watershed Management Plan*. Peninsula Watershed Natural and Cultural Resources.
- Johnson, Eric. 2002. PG&E. Personal communication with Katy Carrasco. September 10.
- Wert, Steve. 2002. CDF Division Chief of San Mateo and Santa Clara Counties. Personal communication with Katy Carrasco. August.