

ATTACHMENT 3-E: APPROVED HERBICIDES AND APPLICATION PROCEDURES



United States Department of the Interior
Fish and Wildlife Service
Ecological Services
Carlsbad Fish and Wildlife Office
2730 Loker Avenue West
Carlsbad, California 92008



Mr. Tom Acuna
Senior Land Planner
Sempra Energy
101 Ash Street
San Diego, CA 92101-3017

SEP 26 2000

RE: Comments on Sempra Energy's Herbicide List for San Diego Gas & Electric Operation and Maintenance

Dear Mr. Acuna:

This letter responds to your request, dated 8 August 2000, and received by our office 11 August 2000, for our review of 18 herbicide products San Diego Gas & Electric (SDG&E) proposes to use in their Vegetation Management Program. Specifically, herbicides will be sprayed where pole-brushing activities occurred earlier this year to help reduce pole-brushing efforts in 2001. In addition, herbicides will be used to keep vegetation away from facilities and other existing work areas.

We have reviewed the Sempra Energy Toxicology Report prepared by Ogden Engineering, dated 8 August 2000, that discusses the characteristics of the 18 herbicides proposed for use by SDG&E and offer the following precautions:

1. The following active ingredients raise concerns over aquatic toxicity and should not be used within 100 meters of surface waters:

dichlobenil
sethoxydim
simazine
trifluralin
oryzalin
diquat dibromide
diuron
triclopyr (ester formulations)
pendimethalin
oxyfluorfen

2. The following active ingredients are known groundwater contaminants and should not be used in areas where the groundwater is shallow and may surface in the vicinity, or in areas with human use of groundwater resources:

simazine
chlorsulfuron
trifluralin
diuron
triclopyr
tebuthiuron

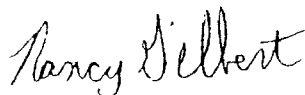
3. Additional toxicity concerns have been raised regarding the following herbicides:

- Simazine has been identified as a potential endocrine disruptor.
- Chlorsulfuron has been identified as a potential developmental and reproductive toxin.
- Diquat dibromide has been associated with avian impacts in areas receiving repeated applications.
- Diuron has the potential to cause bird kills and has been shown to cause reproductive effects in rats.
- Pendimethalin has the potential to cause bird kills.

These herbicides are not recommended for use in areas occupied by sensitive species, particularly during the breeding season.

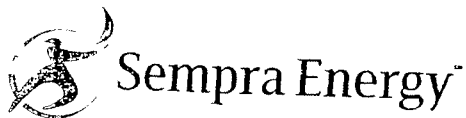
If you have any questions regarding this letter please contact Kathleen Brubaker at (760) 431-9440.

Sincerely,



Nancy Gilbert
Assistant Field Supervisor

cc: Bill Tippets, CDFG



November 10, 2000

Ms. Nancy Gilbert
U.S. Fish & Wildlife Service
2730 Loker Avenue West
Carlsbad, CA 92008

Re: Implementation of USFWS Suggested Precautions in Herbicide Application for Polebrushing

Dear Ms. Gilbert:

Sempra Energy appreciates the suggested precautions for the application of herbicides offered in your September 26, 2000 letter. Sempra had previously provided your office with the Sempra Energy Toxicology Report, dated August 8, 2000 ("Toxicology Report") and the Sempra Energy Corporate Contractor Herbicide Application Protocol ("Application Protocol"). The Toxicology Report discusses the characteristics of 18 herbicides proposed for use by SDG&E, and the Application Protocol demonstrates the current institutional precautions which Sempra requires be used by its contractors prior to application of herbicides. It is our understanding that Service's suggested precautions were developed by Service toxicology staff without the benefit of having reviewed Sempra's current Application Protocol.

The purpose of this response is to provide the Service with assurances that the suggested precautions are addressed in Sempra's preapplication planning and Application Protocol. The protocols are tailored to assure that personal and public safety and protection of the environment are priorities in the application of necessary herbicides.

SDG&E Pole Brushing Program

SDG&E's pole brushing activities are fire prevention measures, required under Public Resources Code § 4292, to clear all vegetation to mineral soil within a 10-foot radius area around utility poles with equipment that can start fires. SDG&E has 24,000 poles that are required to be clear of ignitable vegetation 12 months each year. The year-round program consists of chemical pole brushing (October through March), and mechanical pole brushing (April through September). Pre-emergent, soil applied, herbicides are used during chemical pole brushing and

post-emergent, foliar applied, herbicides are applied during mechanical pole brushing. Herbicide application in all instances is conducted with hand held applicators to ensure that application is limited to target areas.

Service's Concerns and Application Protocols

The Service suggested three categories of precautions for Sempra's application of particular herbicides: application within 100 meters of surface waters, application near shallow groundwater, and other toxicity concerns. Sempra stepwise method of preventing harm to wildlife and water sources included in the protocols reflects that these precautions are being undertaken in the current program. The review steps taken prior to application of herbicides include the following:

Prior to any activities in the field, Sempra's Land Planning and Natural Resource Department ("LPNR") screens the area of proposed herbicide application through Sempra's database of sensitive habitat resources (Application Protocol 4a). This database includes all rare plant locations known to SDG&E occurring within easements and fee owned properties. If rare plants are located in the proposed application area, the application area is removed from the herbicide application program — pole brushing is achieved in these areas by removal by hand.

If the screening process does not indicate the presence of rare plants, Sempra's Environmental Services Department ("ESD") provides the application location to the herbicide contractor. ESD requires that the herbicide contractor complete a physical and climactic target area evaluation form ("Evaluation Form") prior to application of herbicide (Application Protocol 4b).¹ This form sets out sixteen predictors of sensitive habitat and the ability of localized application to spread to non-target areas. If the contractor positively identifies any of the indicators, herbicide application at that location is aborted by the contractor and ESD is notified. If the condition of concern is climatic (e.g. imminent rain), the application will be rescheduled. If the condition of concern is physical and if ESD determines that herbicide application in that area is absolutely necessary at that time — because of an imminent risk of fire, for example — ESD consults with LPNR prior to herbicide application. If LPNR concludes that herbicides should not be used, pole brushing will be achieved in that area by alternative methods, such as repetitive mechanical clearing.

If the Evaluation Form indicates that herbicide can be applied in application area, the contractor is required to follow Sempra's Application Protocols, discussed in detail below. Sempra believes that this multi-layered approach to protecting the environment addresses the Service's suggested precautions.

1. Service Precautions Regarding Application Within 100m of Surface Waters

Polebrushing activities and herbicide application in the vicinity of surface waters is rare, as most pole sites are located away from floodway areas which could be damaged in storms. The Application Protocols require multiple measures to prevent herbicides from presenting any threat

¹ A copy of this form is enclosed with this letter.

of harm to surface waters. Review in the Evaluation Form requires consultation with LPNR where surface water or a well is present within 50 feet of the target area, or if the target area is within a dry streambed. Protocol 4c prohibits the direct application to surface waters and drainage channels, or within 50 feet of surface waters, including wetlands and dry streambeds. Protocol 4c also prohibits application to areas identified as mima mound and vernal pool areas (identified in the LPNR initial review). Protocol 4c prevents runoff and contamination of non-target areas by prohibiting application of herbicides during storm events, while the area is irrigated or when rain is imminent and on slopes steeper than 1:1 (vertical rise: horizontal distance). Application on slopes of steeper than 1:4 requires construction of a soil berm at the down-slope perimeter of the target areas. Finally, Protocol 4c restricts application in times of high wind in order to avoid chemical drift onto non-target areas.

A number of other Protocols address aquatic toxicity, though more indirectly. For example, Protocol 3 addresses the application amount and safe mixture of chemicals, while Protocol 4a requires minimization of chemical usage. Finally, of the ten (10) herbicides listed as presenting a potential aquatic toxicity threat, Sempra no longer uses four (4) of them at all (simazine, trifluralin, oryzalin, and diquat dibromide). The remaining six (6) herbicides used by Sempra are actually registered for aquatic use by the U.S. EPA at SDG&E's application concentrations. It is also noteworthy that foliar applied products cannot relocate and thus are less a concern for reaching nontarget areas.

2. Service Concerns Regarding Application Near Shallow Groundwater

Protocol 4c — described in detail above — is aimed at avoiding harming wildlife, aquatic wildlife and vegetation, avoiding chemical runoff, and avoiding contamination of non-target areas. In addition, the protocol specifically prohibits the application of herbicides where wells exist, even if abandoned and in wetland and streambed areas, which are indicative of shallow groundwater which may surface in the vicinity. Using these indicators of shallow groundwater, the Services precautions are incorporated into the existing protocols. Herbicide application is further prohibited anywhere outside the target area.

Of the six (6) herbicides listed by the Service as a groundwater concern, Sempra no longer uses two simazine and trifluralin. Of the remaining products, one is foliar applied (triclopyr) which should not raise a groundwater concern. Furthermore, Sempra does not apply these herbicides if landowners, homeowners, or land managers express perceived concerns of groundwater contamination.

3. Service Concerns Regarding Toxicity

The measures in the prescreening, Evaluation Form and Protocol 4c are designed to avoid harming sensitive species and habitat and to avoid chemical runoff and drift into non-targeted areas. These measures will be strictly adhered to by herbicide applicators, and should sufficiently protect natural resources from any potential negative effects. Additionally, chemical polebrushing occurs primarily during the fall and winter, which is outside the breeding season for most birds of concern. Finally, Sempra no longer uses two of the five herbicides identified by the Service as potentially presenting toxicity concerns — simazine and diquat dibromide. It is

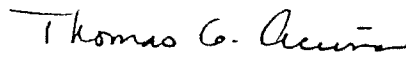
our understanding that the manufacturer of chlorsulfuron, after extensive testing of the herbicide, concluded that it has no reproductive or developmental toxicity issues.

Conclusion

As evidenced by the program described above, Sempra shares the Service's concerns regarding the protection of the environment, natural resources, and human health from any adverse effects of herbicide application. Sempra's multi-layered approach to achieving this program will protect sensitive habitat areas, surface waters and wetlands, or groundwater from being impacted by herbicide application. It is our belief that these measures adequately address the suggested precautions delineated in the Service's letter dated September 26, 2000, and Sempra will continue to proceed with herbicide application under this program.

If you have any questions regarding the program, please contact the undersigned at your earliest convenience. Unless the Service indicates otherwise by November 17, 2000, Sempra will assume that its program as described in this letter and attachments is sufficient to address the Service's precautions.

Sincerely,



Thomas Acuna
Senior Land Planner

SEMPRA ENERGY

PHYSICAL AND CLIMATIC TARGET AREA EVALUATION FORM

DO NOT APPLY HERBICIDES TO TARGET AREAS WHERE "YES" IS CHECKED. IF THE TARGET AREA CHECKED "YES" IS CRITICAL TO FIRE PREVENTION, CALL LAND PLANNING AND NATURAL RESOURCES (619) 696-2392 AND SEMPRA ENVIRONMENTAL SERVICES AT (619) 696-4672 FOR SPRAYING PERMISSION.

	YES	NO	ENVIRONMENTAL CONDITION ON TARGET AREA:
			SAFETY AND HEALTH:
1			Is the target area within an area where children or pets are playing? Is the target area within an area where children or pets could play and label directions and cautions, the Sempra Energy Approved Herbicide List restrictions, or regulatory restrictions prohibit or cautions it's use?
2			If applying herbicides to target areas located where domesticated animals graze, does the herbicide label application instructions, cautions, Sempra Energy Approved Herbicide List restrictions, or the Department of Agriculture regulations prohibit or restrict it's use?
			PHYSICAL:
3			Is a surface water body with water present (as measured from its bank, if any) such as a creek, stream, river, lake, wetland, marsh, or irrigation ditch within 50 feet of the target area?
4			Are there nests present in the target area?
5			Are there dens or burrows in the target area and the date of spraying is scheduled between March 1 and August 31?
6			Is the target area within a dry bed (including water-side banks) of a water body?
7			Is the target area within 50 ft of a wellhead? <i>(even if the well appears abandoned)</i>
8			Is the application going to be applied to bare (unvegetated) areas of a target area that has a slope steeper than 1 ft:1 ft (vertical rise: horizontal run)(45 degree angle) ? See the Sempra Energy Protocol for application guidelines for slopes between and including 1 ft: 1ft and 1 ft: 4 ft.
9			Is the target area within a field where agricultural crops or groves are grown (or immediately adjacent where runoff can carry it to an agricultural field or grove) and the herbicide is inappropriate for application in such an area per label directions or cautions, or per the Sempra Energy Approved Herbicide List restrictions or Pest Control Advisor recommendations?
10			Is the target area on landscaped grounds including lawns, shrubs, home plantings, etc. where irrigation or sprinkler systems may cause runoff to adjacent property where permission to spray has not been given?
			CLIMATIC:
11			Is the windspeed greater than or equal to 10 miles per hour?
12			Does the spray visibly drift off the target area (e.g. move sideways or up prior to hitting the ground)?
13			Is the target area within the contact area of an irrigation or sprinkler system that is actively spraying or dispensing water, or within 50 ft downgradient of the contact area of an actively spraying or dispensing irrigation or sprinkler system?
14			Is there active rainfall (more than mist or light rain) occurring where there is or will be runoff, or is such a rainfall imminent during the application drying time?
15			Is there visible ponding or standing water (indicating saturated ground) present in the target area?
16			<i>For Foliar Application (Post-emergent application):</i> Is it raining or is rain imminent?

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#	Item:	Detail:
1	Herbicide Selection:	
	For each herbicide:	Use only herbicides on the Sempra Energy Approved List and according to any listed restrictions. From this list, use only the non-conflicting herbicides, herbicidal mixes, and dilutions which have been provided in the Pest Control Advisor's written recommendations and product manufacturer's directions, and approved by the Utility's Vegetation Management Team.
2	Contract Personnel Qualifications:	
	Contract Company:	<ol style="list-style-type: none"> 1. The contract application company must have a valid and current pest control business license. 2. The office of the contracting company responsible for the supervision of the contract application of herbicides must have one or more persons in a supervisory position who holds a qualified applicator license with categories of herbicide applications supervised by that person. 3. The contract application company must be registered in the county for the then current calendar year. 4. The contracting company must have an effective, written injury and illness prevention program (IIPP) and other appropriate written environmental and safety programs. 5. If the application is to be within the state of California, Operations must comply with California Code of Regulations Title 3 Division 6 and other relevant state or local regulations and ordinances. For other states or locales, Operations must comply with all national and applicable state and local regulations and ordinances. Call Sempra Energy Environmental Services at (619) 696-4672 for assistance.
	Contract Field Crew Supervisor	The supervisory person(s) must be familiar with the application sites, and at a minimum, routinely monitor the application of herbicides at sites under his/her responsibility.
	Applicators:	If the application is within the state of California, each field applicator must have documented training pursuant to California Code of Regulations Title 3 Section 6700 et al and Title 8, Section 5194 and other relevant state and local environmental and safety ordinances. For other states or locales, applicators must have documented training complying with all national, state or local regulations and ordinances. Call Sempra Energy Environmental Services at (619) 696-4672 for assistance.

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3	Application Mixture:	
	Application amount per acre	Use application amount provided in Pest Control Advisor's written recommendations and product manufacturer's directions and approved by the Utility's Vegetation Management Team.
	Mixing:	Mix according to Pest Control Advisor's written recommendations, as approved by the Utility's Vegetation Management Team, to achieve desired application rates.
4	Application Protocols:	
4a.	Pre-Field Procedures:	
	Use and notification:	<ol style="list-style-type: none"> 1. Use only herbicides on the Sempra Energy Approved List. From this list, use only the herbicides, herbicidal mixes, and dilutions which have been provided in the Pest Control Advisor's written recommendations and product manufacturer's directions, any more restrictive contractor application protocols or checklists, in accordance with any Sempra Energy Approved Herbicide List restrictions, and as approved by the Utility's Vegetation Management Team. 2. Target Areas for possible herbicide application must be pre-approved by the Utility Vegetation Management Team and Sempra Energy's Land Planning and Natural Resources Section. 3. Follow the Utility approved contract clauses and protocols for customer notification.
	Applicator Crew Hazard Information	<ol style="list-style-type: none"> 1. Provide material safety data sheets (MSDS) for all crew hazardous material and herbicide inventories. 2. Provide all label instructions, Sempra Energy Approved Herbicide List and Pest Control Advisor recommendations. 3. Provide hospital location information. 4. Maintain an up-to-date-set of the above information in each crew vehicle.
	Protective Measures and Emergency Supplies	<ol style="list-style-type: none"> 1. Provide safe work practices and personal protective equipment (PPE) for hazards associated with work, and a means to clean and store PPE. 2. Provide emergency supplies to flush or treat injuries or hazardous material contact.

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<p>Mixing and Loading Vehicles:</p>	<p>Mixing and loading must be conducted prior to entering the field. Chemical transfer from one container to another should be minimized but when necessary, should be conducted on an impermeable surface such as a truck bed, drain pan, or drip pans to prevent spills or leaks from contaminating the ground surface. Check that each vehicle loaded with chemicals is equipped with Spill Kit(s), which is capable of containing the volume of the largest container on the vehicle. Also, ensure that each vehicle or crew has a hand-held wind velocity meter or the equivalent.</p>
<p>Minimize chemical usage:</p>	<p>Plan to use the minimal amount of chemical that is adequate to do the job(s) at each location and minimize overlap of spray areas. Utilize a spray nozzle designed to reduce drift. Follow manufacturer's direction of use of spray equipment. For small manual (plastic bottle) spray applications, spray only where effective and do not over spray or over wet the area.</p>
<p>Equipment calibration/inspection:</p>	<p>Ensure spray equipment is calibrated and check all equipment prior to entering the field to ensure proper functioning. Improperly functioning equipment can result in spills, leaks and misapplication of spray.</p>
<p>Safety Equipment, Material Safety Data Sheets, Chemical Emergency Equipment</p>	<p>Provide splash protective clothing/footwear, headgear, face/eye protection, and specific chemical resistive gloves to protective equipment/heat stress trained employees. Provide the means to clean and/or dispose of protective equipment and cleaning material after equipment use.</p> <p>Provide Material Safety Data Sheets (MSDS) for all materials to be used on the job for each vehicle or crew. Provide chemical splash/spill emergency wash supplies for each vehicle or crew.</p>
<p>4b. In-Field Initial Procedure:</p>	
<p>Prior to applying ANY chemical you must:</p>	<ol style="list-style-type: none"> 1. Use the Physical and Climatic Target Area Evaluation Form to evaluate target location prior to each application. 2. Check the weather daily before application. (Note: A detailed, 24-hour, recorded weather message may be accessed by calling 619-289-1212)
<p>Setup and mechanical</p>	<ol style="list-style-type: none"> 1. At each target area, locate the work setup area to minimize environmental disturbance. 2. If applicable to the particular purpose and type of activity of the herbicide (primarily for pre-emergent herbicides), mechanically remove appropriate vegetation in the target area prior to application.

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<p>4c. Application Prohibitions:</p>	
<p>Procedures to avoid g humans and domestic animals</p>	<ol style="list-style-type: none"> 1. Do NOT allow herbicides to contact humans or domestic animals. Do NOT apply to areas that they routinely contact such as yards or pens except as allowed by label instructions and landowner consent. 2. Do NOT allow herbicides to contact or drift onto food crops, drinking water, or food or feed storage areas.
<p>Procedures to avoid harming wildlife and valued vegetation</p>	<ol style="list-style-type: none"> 3. Do NOT spray herbicides directly on any wildlife species. If nests are observed within the target area contact Sempra Energy Land Planning & Natural Resources at (619) 696-2392 prior to conducting the work. If dens or burrows are observed in a target area, observe the following restrictions: <ol style="list-style-type: none"> a. Use only products identified as non-toxic to birds and small mammals during the period March 1 through August 31. 3. If applying herbicides to target areas located where domesticated animals graze, apply the herbicide strictly according to label directions and precautions and according to any Department of Agriculture regulations. 4. Do Not spray herbicide or allow herbicide to drift outside of the target area
<p>Procedures to avoid harming aquatic wildlife and valued vegetation and to avoid chemical runoff</p>	<ol style="list-style-type: none"> 1. Do NOT spray herbicides directly into roadside drainage channels unless the channel is part of a pole targt area and there is no running or standing water. Apply only to the target area of the dry drainage channel. 2. Do NOT apply within 50 feet of the edge of any surface water body <u>when water is present</u> (as measured from the "bank," if a "bank" is present, to the edge of the target area). Never apply directly to a surface water body or to the water side of a bank of a surface water body. This direct application prohibition applies to the dry bed of a seasonal water body. A surface water body includes: <ul style="list-style-type: none"> * Any Waters of the US or California such as creeks, streams, rivers, lakes, or ocean. * Any inter-tidal area, estuary, marsh or wetland * Any natural drainage channels containing standing or running water, or not a target area. * Any irrigation ditches or storm drain inlets

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<p>Procedures to avoid harming aquatic wildlife and valued vegetation and to avoid chemical runoff (Cont'd).</p>	<p>3. Do not apply to Vernal pool and mima mound complex areas as defined by Sempra Energy Land Planning and Natural Resources. Do not apply within 50 feet of any well head, including abandoned wells. Do not generally apply to impermeable ground surfaces such as granite or pavement, but use a spot application technique, just spraying actual or potential vegetation growth spots.</p>
<p>Procedures to avoid chemical runoff and contaminating non-target area:</p>	<p>1. Do NOT apply if it is 'actively raining' (more than mist or light rain), being irrigated, or rain is imminent (within application drying time). Do NOT use herbicides until "storm event" or active irrigation has abated to avoid contaminating runoff. (A "storm event" is when rainfall is sufficient to cause runoff") 2. Do NOT apply if the target area soil has puddles or standing water. Do NOT apply until the soil becomes drier. 3. For FOLIAR (post-emergent) APPLICATIONS - Do NOT apply herbicide spray during rain or when rain is imminent. 4. Do NOT apply to any non-vegetated (bare) areas of a sloped target area with a slope steeper than 1ft:1ft (vertical rise: horizontal distance). For target areas with a slope greater than 1ft: 4ft but less than or equal to 1ft: 1ft, construct a 4-6-inch mineral soil berm outside the down slope half-circle perimeter prior to spraying any part of the targeted area. 5. Do NOT lay applicator wand on the ground or leave it unattended.</p>
<p>Procedures to avoid chemical drift onto non-target areas:</p>	<p>1. Do NOT apply herbicides when wind velocity exceeds 10 mph as measured at chest height (approximately 5 ft from ground surface). Use handheld wind velocity meter and record the wind velocity on your daily pesticide application report. If you observe the spray being carried sideways or floating up, or off the target area, STOP spraying and re-evaluate wind conditions. Do NOT spray herbicides at this location until the condition causing drift has abated. 2. Set pressure gages prior to applying herbicides. Use the pressure range recommended by the manufacturer of the specific spray nozzle but DO NOT exceed 40 psi. 3. Apply the herbicides at a designated height above the soil surface recommended by the manufacturer of the specific nozzle used but DO NOT EXCEED 18" maximum.</p>
<p>4d. In-Field Application procedures:</p>	
<p>Complete all pre-application checks :</p>	<p>Apply herbicides ONLY when the accompanying Sempra Energy Physical and Climate Target Area Evaluation and any additional contractor site evaluation checks are acceptable. Record any prohibited areas and adverse conditions encountered.</p>

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<p>Procedures to avoid additional environmental impacts:</p>	<p>1. Do NOT scatter or stack brushed vegetation or chipped waste in any surface water body, including storm drains, drainage, and drainage inlets where runoff may carry the material into a water body. Remove woody vegetation waste as soon as possible from the site.</p> <p>2. Do NOT fuel, clean or maintain any vehicle or equipment within 100 ft of any water body. Any maintenance performed in the field should be minimized but when necessary, should be conducted on an impermeable surface such as a truck bed, drain pan, or drip pans to prevent spills or leaks from contaminating the ground surface. All solid waste and rubbish should be removed from each location.</p>
	<p>3. Avoid tracking mud from vehicles or equipment when re-entering paved public roadways from off-road, whenever possible. If sediment soil is tracked onto a paved roadway, use a shovel or broom to sweep it up prior to leaving the location or at the end of the workday. Swept materials should be disposed into a vegetated area nearby and not into drainage channels, gutters, or water bodies.</p> <p>4. NEVER dump any excess pesticides on the ground, on pavement, in storm drains, in drainage ditches, in sanitary sewers or use on non-targeted areas. Excess materials and empty containers must be returned to the contractor's yard.</p>
<p>5 Post-Application Protocols:</p>	
<p>Protocol for disposing of any water used to clean application equipment</p>	<p>Spray tanks to be cleaned at the end of the day must be cleaned in the employer's yard. Do NOT drain wash water from equipment cleaning onto the ground. All wash waters must be reused.</p>
<p>Protocol for unused herbicides</p>	<p>Storage and disposal should be handled according to the manufacturer's label. Unused herbicide spray must be used appropriately at another appropriate target location or must be returned to your employer's yard for recycling. Again, NEVER dump any excess pesticide onto a roadside, storm drain, drainage ditch, sewer, ground, or anywhere else. Excess materials and empty containers must be returned to the contractor's yard.</p>
<p>Post-application report form</p>	<p>Fill out all required forms describing application performed for each site</p>

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6 Environmental Accident Procedures:	
For responding to a Spill	Apply an absorbent material, wait for 5-10 minutes, then sweep or shovel material along with affected media (soil, paper, wood) into a hazardous material holding container (drum or bag). Do NOT wash with water. Properly label the container with name of pesticide, toxicity category, name of manufacturer, and manufacturer phone number. Call Utility emergency contacts: And Sempra Energy Hazardous Waste Management (619) 696-4925.
For Spray application to prohibited areas:	Report any accidental spray of any prohibited physical features or wildlife immediately to your supervisor. The supervisor should report any incident to SDG&E Vegetation Control management as soon as feasible but no later than 24 hours from discovery.