

REPORT ON
SOIL CONTAMINATION HANDLING PLAN
TIE LINE 649 WOOD-TO-STEEL REPLACEMENT
SAN DIEGO COUNTY, CALIFORNIA

by
Haley & Aldrich, Inc.
San Diego, California

for
Insignia Environmental
Encinitas, California

File No. 133325-002
June 2019





HALEY & ALDRICH, INC.
5333 Mission Center Road
Suite 300
San Diego, CA 92108
619.280.9210

11 June 2019
File No. 133325-002

Insignia Environmental
904 Second Street
Encinitas, California 92024

Attention: Mr. Armen Keochekian

Subject: Soil Contamination Handling Plan
Tie Line 649 Wood-to-Steel Replacement
San Diego Gas & Electric
San Diego County, California

Dear Mr. Keochekian:

Haley & Aldrich, Inc. (Haley & Aldrich), is pleased to provide this Soil Contamination Handling Plan (Plan) to Insignia Environmental (Insignia) for San Diego Gas & Electric's (SDG&E's) Tie Line 649 Wood-to-Steel Replacement Project (Project) in the southern portion of San Diego County, California (Site). This Plan has been prepared to describe the soil management procedures that will be implemented to protect human health and the environment during Project activities to meet the requirements of mitigation measure HAZ-3 appearing in the Final Initial Study/Mitigated Negative Declaration (IS/MND) dated 5 October 2018 submitted to the California Public Utilities Commission.

If you have any questions, please contact the undersigned.

Sincerely yours,
HALEY & ALDRICH, INC.



Carly Nemanic
Scientist



Robert K. Scott, P.G., C.Hg.
Senior Associate Hydrogeologist



Enclosures

\\haleyaldrich.com\share\CF\Projects\133325\133325-002\Deliverables\SMP\2019_0611_HAI_SDGE_TL649_SMP_F.docx

SIGNATURE PAGE FOR
REPORT ON
SOIL CONTAMINATION HANDLING PLAN
TIE LINE 649 WOOD-TO-STEEL REPLACEMENT
SAN DIEGO COUNTY, CALIFORNIA

PREPARED FOR
INSIGNIA ENVIRONMENTAL
ENCINITAS, CALIFORNIA

PREPARED BY:

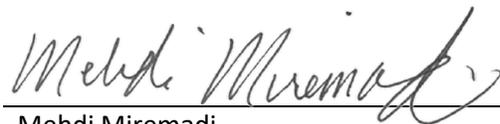
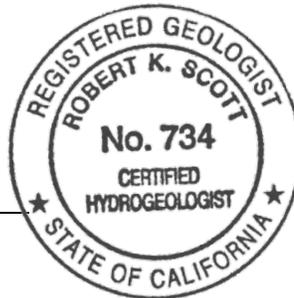


Carly Nemanic
Scientist
Haley & Aldrich, Inc.

REVIEWED AND APPROVED BY:



Robert K. Scott
Senior Associate Hydrogeologist
Haley & Aldrich, Inc.



Mehdi Miremadi
Principal Consultant
Haley & Aldrich, Inc.

Table of Contents

	Page
List of Figures	ii
1. Introduction	1
1.1 OBJECTIVES	1
1.2 SITE AND PROJECT DESCRIPTION	2
1.3 REPLACEMENT DESCRIPTION	3
1.3.1 Pole Replacement	3
1.3.2 Conversion of Underground and Overhead Lines	4
1.3.3 Access Road Modifications and Improvements	5
2. Health and Safety Plan	6
3. Pre-Excavation Soil Sampling and Reporting	7
3.1 FIELD PROCEDURES	7
3.1.1 Soil Sampling	7
3.1.2 Equipment Decontamination	7
3.1.3 Sample Documentation	8
3.2 LABORATORY ANALYSIS	9
3.3 REPORTING	9
4. Soil Management During Pole Replacement Activities	10
4.1 EXCAVATION AND SOIL HANDLING METHODS	11
4.2 UNANTICIPATED SOIL CONTAMINATION REPORTING	12
4.3 FIELD QUALITY CONTROL MEASURES	12
4.3.1 Equipment Decontamination	12
4.3.2 Sample Container Labeling	12
4.3.3 Sample Chain of Custody	13
4.4 WASTE PROFILING	13
4.5 WASTE TRANSPORTATION AND DISPOSAL	13
5. Tentative Schedule	15
References	16

List of Figures

Figure No.	Title
1	Project Locus
2	Project Location Map
3	Soil Sample Locations

1. Introduction

This document serves as the Soil Contamination Handling Plan (Plan) that will be implemented during San Diego Gas & Electric's (SDG&E's) Tie Line 649 (TL 649) Wood-to-Steel Replacement Project (Project) in the southern portion of San Diego County, California (Figures 1 and 2). Information in this document includes the project description, description of the existing Site, and relevant background information for replacement of the existing wood poles to steel and the procedures to manage soil disturbance during these activities.

1.1 OBJECTIVES

This Plan has been prepared to describe the soil management procedures that will be implemented to protect human health and the environment during Project activities to meet the requirements of mitigation measure HAZ-3 appearing in the Final Initial Study/Mitigated Negative Declaration (IS/MND) dated 5 October 2018 submitted to the California Public Utilities Commission. The Plan will be implemented during pole replacement activities between Pole Nos. 63 and 96.

Following is mitigation measure HAZ-3 from the IS/MND:

“Perform Soil Sampling and Soil Management Procedures.

The following measures shall be implemented:

Soil testing for metals contamination shall be conducted for all excavation activities within 500 feet of the former Brown Field Bombing Range FUDS eligible property boundary (e.g., excavation activities occurring at Pole Nos. 63 through 96). In addition, an unanticipated soil contamination handling plan shall be prepared to address the procedures to be followed if contaminated soils are encountered during testing or excavation activities. This plan shall contain guidelines for the characterization, any necessary removal, transport, and disposal of contaminated soil requiring excavation during construction. The plan shall emphasize that all activities within or in close proximity to contaminated areas shall adhere to all applicable federal, state, and local environmental and hazardous waste laws and regulations.

If soil that is stained, discolored, odorous, or otherwise suspected to be contaminated is encountered in other areas of the proposed project during excavation activities for project construction or operation, work shall be stopped and a qualified environmental professional shall evaluate the suspect soil. The qualified environmental professional shall be a professional engineer or professional geologist registered in California, with applicable experience in the evaluation and remediation of hazardous waste, or someone under their direct supervision, or have a Baccalaureate degree or higher in science or engineering and five years of relevant full-time work experience; or ten years of relevant full-time work experience. The suspect soil shall either be sampled in place and analyzed to determine appropriate management options or containerized and managed in accordance with all applicable federal, state, and local regulations. Based on the results of observation and analysis, the contractor's health and safety officer or the appropriate SDG&E representative shall decide whether to remove or avoid the contaminated soil.

If during excavation work, the contractor observes visual or olfactory evidence of contamination in the exposed soil, a report of the location and the potential contamination, results of laboratory testing, recommended mitigation (if contamination is verified), and actions taken shall be submitted to the CPUC for each event. This report shall be submitted within 30 days of receipt of laboratory data.

HAZ-3 Monitoring and Reporting Action:

- 1. Confirm that soil testing for metals contamination is conducted for all excavation activities within 500 feet of the former Brown Field Bombing Range FUDS boundary.*
- 2. Confirm preparation of an unanticipated soil contamination handling plan.*
- 3. Ensure that the handling plan incorporates all provisions detailed in this measure.*
- 4. Confirm that work will stop should contaminated soil be encountered in other areas or the proposed project during excavation activities, and soil is evaluated by a qualified environmental professional.*
- 5. Confirm that suspect soil is sampled and analyzed in place or containerized and managed in accordance with all applicable regulations.*
- 6. Ensure that if there is evidence of contamination in the exposed soil, a report is prepared and actions taken; report shall be submitted to the CPUC for each event.*
- 7. Confirm that a report is submitted within 30 days of receipt of laboratory data.”*

1.2 SITE AND PROJECT DESCRIPTION

To maintain existing electric power lines and improve overall system dependability, SDG&E has prioritized fire prevention and preparedness in high-risk and wind-prone areas. Past wildfire events have resulted in widespread damage to SDG&E property and service outages. SDG&E routinely replaces existing wood poles with steel poles to reduce the hazard from wildfires. The pole replacement is part of the ongoing upgrades to improve service reliability and reduce fire threat along approximately seven miles of power lines.

The Site is located in the southern portion of San Diego County, California, approximately 12 miles southeast of downtown San Diego and approximately 1.5 miles north of the United States-Mexico border, as shown on Figure 1. The portion of TL 649 that will be replaced is approximately seven miles in length and between pole locations 1 and 117, as shown on Figure 2. Replacement poles will be placed within SDG&E’s existing alignment. The Project extends through portions of the City of Chula Vista, the City of San Diego, and unincorporated San Diego County.

Surrounding land uses along the Project alignment include residential, recreational, institutional, open space, rural lands, public lands, and utility corridors. The western portion of the Project alignment (Pole Nos. 1 through 17), west of Heritage Road, passes through residential developments. East of Heritage Road, TL 649 continues east approximately 3.9 miles (Pole Nos. 18 through 76) and then turns south for 1.1 miles (Pole Nos. 76 through 97), passing through mostly undeveloped open space, public and rural lands. TL 649 continues southerly adjacent to the Richard J. Donovan Correctional Facility (Pole Nos. 88 through 97) and then turns west continuing through undeveloped open space, public and rural lands for approximately 0.3 mile (Pole Nos. 97 through 103). The alignment then turns south for approximately 0.8 mile (Pole Nos. 103 through 117), parallel to Harvest Road, terminating approximately 0.5 mile north of Otay Mesa Road.

The northeast portion of the proposed Project (Pole Nos. 64 through 94) is located within the Formerly Used Defense Site (FUDS) eligible boundary of the former Brown Field Bombing Range (Bombing Range). The Bombing Range was used by the U.S. Navy as a bombing practice and aerial rocket range. Military munitions and explosives of concern (e.g., unexploded ordnance [UXO]) and metals have been found in the soil of this Site (Parsons 2007). A UXO field investigation was conducted by InDepth Corporation in 2017 to identify UXO or Material Potentially Presenting an Explosive Hazard (MPPEH) on the surface of the Project footprint that could pose a hazard to Project personnel. Based on this investigation, InDepth Corporation concluded that Project personnel will not be exposed to surface UXO/MPPEH hazards, and there is a low possibility that there may be practice bomb debris, fuse components, and/or practice bombs in the subsurface that may contain explosive residue.

To address this potential concern of metals in soil identified by Parsons, Mitigation Measure HAZ-3 in the IS/MND requires that all locations within the 500 feet of the FUDS eligible boundary (Pole Nos. 63, 63.1 through 96 and 73.1) where excavation is to be conducted for the Project shall be sampled for metals. A soil contamination handling plan (Soil Management Plan) was proposed to be prepared and implemented to address any unanticipated contamination that may be encountered during excavation activities.

1.3 REPLACEMENT DESCRIPTION

Primary Project components related to soil management involve the removal of existing wood poles, installation of galvanized steel poles, interception and transfer of underground power lines to new pole locations, conversion of existing underground power lines to an overhead configuration, and improvements of existing access roads where undersized. The locations of primary Project components are included on Figure 2.

1.3.1 Pole Replacement

Approximately 132 wooden poles will be replaced with 117 galvanized steel poles. Poles will be installed to support an average conductor span length of 400 feet. Most replacement poles will be within 10 feet of the existing poles; however, others may be placed at a greater distance from the existing poles due to design requirements or Site conditions that present physical restrictions. Each pole foundation requires excavation to various depths. The soil excavated will be characterized and either reused or disposed off-Site. Three different pole installation methods (direct bury, pier foundation, and micro-pile foundation) will be used to install new poles, as discussed below.

1.3.1.1 Direct-Bury Steel Pole Installation

Direct-bury steel poles are proposed at 89 locations. Approximately 4.5-foot-diameter holes to a depth of 6 to 16 feet below ground surface (bgs) will be advanced using a truck-mounted auger, track-mounted drill rig, hand tools, or similar methods. The hole will be backfilled with concrete, and 1 foot of crushed rock will be placed below the bearing plate. Hole drilling will generate approximately 3.5 to 9.5 cubic yards (cy) of soil per pole that will be reused on Site to the extent feasible or disposed off-Site.

1.3.1.2 Pier Foundation Steel Pole Installation

Pier foundation steel poles are proposed at 21 locations. Approximately 7-foot-diameter holes will be advanced using a truck-mounted auger, track-mounted drill rig, hand tools, or similar methods to a depth of 30 feet bgs. Hole drilling will generate approximately 42.8 cy of soil per pole, that will be reused on site to the extent feasible or disposed off-site.

1.3.1.3 *Micro-Pile Foundation Steel Pole Installation*

Micro-pile foundation steel poles are proposed at seven locations. Four to sixteen holes, approximately 6 to 9 inches in diameter, will be advanced in a circular pattern around each new pole location to approximately 30 feet bgs. Holes for micro-pile foundations will be drilled using a small drill rig or similar equipment operated from the top of an elevated platform. Steel rods will be inserted into the holes, centered, and backfilled with a mixture of water, Portland cement, and sand. Steel rods will protrude above grade and will connect to a steel cap/transition plate supporting the structure above grade. Hole drilling will generate approximately 0.9 to 7.9 cy of soil per pole, which will be reused on site to the extent feasible or disposed off-site.

1.3.1.4 *Existing Wood Pole Removal*

After relocation of all conductors and telecommunication cables from wooden poles to steel poles, existing wood poles will be removed from the Project area. The entire pole will be removed unless site conditions suggest leaving the pole base will have less impact. In these cases, the pole will be cut at the base or six to 12 inches bgs and covered with native material. Holes remaining from the removed wood poles will be backfilled with native soils, excavated soil from the new pole locations, or imported materials similar to those in the surrounding area.

1.3.2 **Conversion of Underground and Overhead Lines**

This section includes a discussion of conversion of underground and overhead utility lines for the Project.

1.3.2.1 *Underground Distribution Line Intercepts*

The existing underground distribution lines will be rerouted from existing poles to the new, replacement poles at two locations (refer to Appendix A, Detailed Route Mapset, of the IS/MND). The first pole location (Pole No. 18.5) will extend the existing underground distribution line to the new Pole No. 18.5 location. Wires will travel through conduit placed in a two-foot-wide by 20-foot-long by five-foot-deep trench to link the existing underground distribution line to the new pole location. A four-foot-wide by four-foot-long by five-foot-deep access hole will be excavated for workers to tie into the existing underground distribution line.

The second pole location (Pole No. 25) will necessitate a one-foot-wide by 80- to 100-foot-long by three-foot-deep trench linking the existing underground distribution line to the new pole location. A three-foot-wide by three-foot-long by three-foot-deep access hole will be excavated for workers to tie into the existing underground distribution line. The trenches and access holes will be backfilled with the excavated native materials upon completion.

1.3.2.2 *Conversion of Underground Lines to Overhead*

TL 649 currently crosses underground beneath State Route (SR)-125. The Project will convert the existing underground power lines to overhead, located beneath the SR 125 elevated structure with new steel poles. Conversion from an underground to overhead configuration may require a temporary work area and pulling site that will be approximately 25 feet by 75 feet (1,875 square feet).

1.3.3 Access Road Modifications and Improvements

Site access for the Project will use existing dirt and gravel access roads, as identified in the IS/MND Appendix A, Detailed Route Mapset. Improvements to access roads may be required, such as minor grading, importing and compacting more stable materials (e.g., 0.75-inch to 1-inch gravel or Class II base rock) in unstable areas, or applying additional surface materials to improve access. The extent and location of road repairs will be evaluated prior to and throughout construction.

2. Health and Safety Plan

Haley & Aldrich work activities associated with the baseline investigation and oversight of pole replacement soil disturbance activities between Pole Nos. 63 and 96 will be conducted in accordance with a Site-specific Health and Safety Plan (HASP) prepared in accordance with 9 CFR, Section 1910.120 and 8 CCR §5144 and §5192. Workers involved in these activities will be trained and certified under the Occupational Safety & Health Administration (OSHA) 40-hour hazardous waste operations (HAZWOPER), which includes:

- Identification and description of potentially hazardous substances that may be encountered during field investigation activities;
- Specification of personal protective equipment and clothing for the Site activities;
- Training on measures that may be implemented in the event of an emergency; and
- Participation in a medical surveillance program.

A facility safety meeting will be held with Haley & Aldrich personnel prior to commencing fieldwork. The meeting will cover potential physical and chemical hazards and outline measures to be taken in the event of an emergency. Contractors dealing with impacted soil will be required to prepare their own HASP and comply with OSHA requirements.

3. Pre-Excavation Soil Sampling and Reporting

A pre-excavation soil sampling investigation will be conducted prior to Project activities to further identify the possible presence of metals impacted soil between Pole Nos. 63 and 96 which are located within 500 feet of the FUDS boundary. The investigation will include the following:

- Contact Dig Alert;
- Subsurface utility survey;
- Soil sampling using a hand auger;
- Soil sample chemical analyses;
- Data evaluation; and
- Technical Memorandum summarizing the findings.

Details of the investigation are described below.

3.1 FIELD PROCEDURES

Underground Service Alert (USA) will be contacted at least 48 hours prior to drilling as required by law. A subsurface utility locating service will be retained to clear the proposed boring locations of subsurface utilities and obstructions.

3.1.1 Soil Sampling

Up to 2 soil samples will be collected at each pole excavation (up to 76 samples total) within 500 feet of the FUDS boundary. Samples will be collected at 0 - 1 and 2 - 3 feet bgs using a hand auger at Pole Nos. 63 through 96 (including Poles G, 63.1, 73.1, and 75.1); 38 poles total. Because the borings will be shallower than 20 feet, no permits will be needed from the San Diego County Department of Environmental Health to conduct the borings.

The samples will be collected in laboratory provided clean jars, that will be capped, labeled, and placed in an insulated cooler with ice. The samples in the cooler will be maintained at 4°C and transported under chain-of-custody procedures to a state-certified hazardous materials laboratory for analysis. The coordinates of each location will be documented using a hand-held Global Positioning System device.

3.1.2 Equipment Decontamination

To prevent potential cross-contamination between borings and sampling locations, all down-hole and sampling equipment will be decontaminated with a non-phosphate detergent solution from a spray bottle and paper towels followed by rinsing twice with de-ionized water. The used paper towels will be stored in a plastic trash bag and disposed as municipal waste. Soil cuttings will be returned to the borehole.

3.1.3 Sample Documentation

3.1.3.1 Sample Container Labeling

Containers will be labeled in the field with the following information:

- Haley & Aldrich project number;
- Location/sampling designation;
- Sample number;
- Sample depth;
- Time and date of collection;
- Analysis to be performed;
- Preservation; and
- Sampler name.

The sample labeling convention will include the site, borehole/sample designation, and depth (if appropriate). For example, sample TL649-P63-005 refers to the soil sample taken from the SDG&E TL 649, Pole 63, at a depth of 0.5 feet bgs.

3.1.3.2 Sample Chain of Custody

The following information will be clearly written on each chain-of-custody form:

- Haley & Aldrich project number;
- Laboratory name, address, and phone number;
- Date;
- Haley & Aldrich project manager and phone number;
- Sample identification;
- Sample date and time;
- Analysis requested, including U.S. EPA method;
- Preservation;
- Sampler name and signature;
- Other remarks;
- Date results requested;
- Date delivered to laboratory; and
- Signature date and time for all subsequent changes in sample control.

A copy of the completed chain-of-custody form will be placed in a resealable bag and placed in the cooler. A copy will be retained by field personnel to be placed in the project file. The laboratory performing the analysis will be instructed to return a completed copy of the chain of custody with the analytical results.

3.2 LABORATORY ANALYSIS

Soil samples will be collected from the borings (0 - 1 feet and 2 - 3 feet bgs), and these samples will be analyzed for Title 22 metals by U.S. EPA Method 6010 and Mercury by EPA Method 7471. The FUDS property has no history of activities releasing other potential contaminants.

3.3 REPORTING

The data will be summarized in a Pre-Excavation Technical Memorandum that will be prepared prior to the start of construction on Pole Nos. 63 through 96. The data will be tabulated and where appropriate, shown on maps. Laboratory analytical reports will also be included as attachments.

4. Soil Management During Pole Replacement Activities

SDG&E will endeavor to leave soil in situ during Project activities to the extent feasible. An on-Site Environmental Professional (EP) will be on site to observed Project activities between Pole Nos. 63 and 96. The EP will be qualified and experienced in site assessment and remediation and will meet the requirements for duty appearing in 40 CFR Section 312.10 that states the following:

EP means:

(1) A person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases (see § 312.1(c)) on, at, in, or to a property, sufficient to meet the objectives and performance factors in § 312.20(e) and (f).

(2) Such a person must:

- (i) Hold a current Professional Engineer's (PE's) or PG's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three years of full-time relevant experience; or*
- (ii) Be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries as defined in § 312.21 and have the equivalent of three years of full-time relevant experience; or*
- (iii) (iii) Have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five years of full-time relevant experience; or*
- (iv) (iv) Have the equivalent of ten (10) years of full-time relevant experience.*

(3) An EP should remain current in his or her field through participation in continuing education or other activities.

(4) The definition of EP provided above does not preempt state professional licensing or registration requirements such as those for a PG, PE, or site remediation professional. Before commencing work, a person should determine the applicability of state professional licensing or registration laws to the activities to be undertaken as part of the inquiry identified in § 312.21(b).

(5) A person who does not qualify as an EP under the foregoing definition may assist in the conduct of all appropriate inquiries (AAI) in accordance with this part if such person is under the supervision or responsible charge of a person meeting the definition of an EP provided above when conducting such activities. Relevant experience, as used in the definition of EP in this section, means: participation in the performance of AAI investigations, environmental site assessments, or other site investigations that may include environmental analyses, investigations, and remediation which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases or threatened releases (see § 312.1(c)) to the subject property.

Prior to initiation of work, during safety meetings, Site workers will be briefed on the potential to encounter impacted soil and will be instructed to notify the EP or On-Site Foreman if impacts to soil are suspected. Since pre-excavation soil sampling and laboratory analysis will be conducted prior to Project activities, the EP will screen soil removed using visual observation. If field observations suggest that soil may be impacted, the EP will notify the Project Manager and On-Site Foreman and implement appropriate additional safety precautions. Soil removed from areas identified as impacted will be segregated and loaded directly into trucks for off-Site disposal. Non-impacted soil that is removed will be returned to the excavations after removal of the infrastructure.

4.1 EXCAVATION AND SOIL HANDLING METHODS

The EP will observe Project activities that involve below-grade soil disturbance and structure removal considering the results of the pre-excavation sampling and field observations of the possible presence of contamination. If potentially contaminated material is encountered, the following procedures will be implemented:

- Construction work will be stopped.
- The construction contractor will contact the EP.
- The EP will contact the SDG&E Project Manager to notify them of the discovery.
- The SDG&E PM will notify the San Diego County Sheriff's Bomb Arson Unit in accordance with MM HAZ-01.
- The elements of this Plan will be implemented.

The EP will review the associated soil sample results with SDG&E and the construction contractor. Based on the results of soil sample analysis, the appropriate SDG&E representative will decide whether to remove or avoid the contaminated soil. The EP's responsibilities in the field will include the following:

- Provide excavation oversight on an as-needed basis when potentially contaminated soil is encountered;
- Conduct any additional sampling and analyses to assist with disposal of materials associated with excavation activities;
- Direct segregation and stockpiling of soil impacted with metals;
- Conduct soil stockpile sampling in accordance with U.S. EPA Guidance SW-846;
- Assist SDG&E with waste profiling;
- Coordinate obtaining SDG&E signatures for waste manifests; and
- Manage soil load-out and oversee disposal in accordance with the results of waste profiling.

Daily Field Reports (DFRs) will be prepared and submitted to SDG&E that include the following information, if applicable:

- A soil screening log and location map;
- Soil sampling locations;
- Photographs of environmental controls and contractor progress;
- Description of contractor work activities; and
- Description of soil screening and environmental oversight findings.

The DFRs will be submitted to SDG&E on a weekly basis.

The EP will maintain records of monitoring and sampling activities conducted during the monitored activities. The locations of impacted soil and storage areas, if soil needs to be removed during construction, will be recorded on the DFRs.

4.2 UNANTICIPATED SOIL CONTAMINATION REPORTING

The results of sampling and analyses for excavated soil during Plan implementation will be summarized in brief technical memorandum for each instance where unanticipated contamination is encountered during the Project. The data will be tabulated and where appropriate, shown on maps. Copies of laboratory analytical reports, chain-of-custody forms, DFRs and site photographs will also be included as attachments. The technical memorandum will include recommendations, and actions taken will be submitted to the CPUC for each event. The technical memorandum will be submitted to the CPUC within 30 days of receipt of laboratory data.

4.3 FIELD QUALITY CONTROL MEASURES

4.3.1 Equipment Decontamination

To prevent potential cross-contamination, sampling equipment will be decontaminated with a non-phosphate detergent solution from a spray bottle and paper towels followed by rinsing twice with de-ionized water. The used paper towels will be stored in a plastic trash bag and disposed of as municipal waste.

4.3.2 Sample Container Labeling

Containers will be labeled in the field with the following information:

- Haley & Aldrich project number;
- Location/sampling designation;
- Sample number;
- Sample depth;
- Time and date of collection;
- Analysis to be performed; and
- Preservation.

The sample labeling convention will include the Site, excavation/sample designation, and depth (if appropriate). For example, sample TL649-EXC01-030 refers to the soil sample taken from the SDG&E TL 649, Excavation No. 1 from the sidewall at a depth of 3.0 feet bgs.

4.3.3 Sample Chain of Custody

At least one chain-of-custody form will be used for each sample delivery group. The following information will be clearly written on each chain-of-custody form:

- Haley & Aldrich project number;
- Laboratory name, address, and phone number;
- Date;
- Haley & Aldrich project manager and phone number;
- Sample identification;
- Sample date and time;
- Analysis requested, including U.S. EPA method;
- Preservation;
- Sampler name and signature;
- Special Instructions;
- Date results requested;
- Date delivered to laboratory; and
- Signature date and time for all subsequent changes in sample control.

A copy of the completed chain-of-custody form for each cooler will be placed in a resealable plastic bag in the cooler. A copy will be retained by field personnel to be placed in the project file. The laboratory performing the analysis will be instructed to return a completed copy of the chain of custody with the analytical results.

4.4 WASTE PROFILING

For impacted soil that must be removed and disposed from the Site, the results of pre-excavation soil sampling will be forwarded to a disposal facility for waste classification (non-hazardous, California-hazardous, or Resource Conservation and Recovery Act [RCRA]-hazardous waste) and manifesting. Data will be compared to regulatory standards and disposal facility acceptance criteria. Based on an evaluation, the soil will be given a waste designation (hazardous, non-hazardous or non-impacted) and an appropriate disposal facility will be identified.

4.5 WASTE TRANSPORTATION AND DISPOSAL

Non-hazardous soil generated during demolition activities may be disposed at an SDG&E-approved, local Class III landfill that is appropriately permitted to accept the type of waste being recycled/disposed of such as, but not limited to:

Otay Class III Landfill
1700 Maxwell Road
Chula Vista, California 91911
Phone: (619) 421-5192

Otay Landfill is operated by Republic Services.

If there is soil that is characterized as California-hazardous or RCRA hazardous waste, it will be profiled by SDG&E specialists and managed by SDG&E. The permitted disposal facility will be either of the following Class I RCRA-permitted landfills approved by SDG&E:

Clean Harbors
2500 Lokern Road
Buttonwillow, California 93206
Phone: (661) 762-6200

WMI – Chemical Waste Management
35251 Old Skyline Road
Kettleman Hills, California 93239-0471
Phone: (559) 386-9711

Access and egress routes will be provided to the waste hauler by the construction contractor and SDG&E. During transport, soil in the transport trucks will be covered. The loaded trucks will proceed directly to the designated disposal facility. For impacted soil, the transportation company will comply with federal Department of Transportation registration, operation, and placarding requirements. Loading and transporting of soil will be conducted in such a manner that the generation of dust is minimized. Dust suppression will be managed through the application of water spray and/or suspending loading activities. If at any time, dust emissions are observed to be migrating off-Site, the EP will suspend field activities until the problem is corrected.

The transportation contractor will be required to follow Spill Response Guidelines in compliance with Federal regulations 49 CFR 172.602. The transportation contractor will be equipped with an Emergency Response Guidebook and will be properly trained to respond to an emergency. The on-Site EP will observe soil loading and other related activities and will follow the requirements of the Project's plans and permits.

If excavated impacted soil is characterized as California-hazardous or RCRA hazardous waste, the disposal contractor will be consulted to identify the transportation route from the Site to the disposal facility.

Access and egress routes will be provided to the waste hauler to allow for safe and efficient delivery and pickup of roll-off bins and/or staging and loading of trucks. The transportation company will provide proof of valid hauler registration with the CalEPA and will ensure that vehicles are properly registered, operated, and placarded in compliance with local, state, and federal requirements. Haul trucks will follow the route described in a transportation plan (to be prepared when disposal facility is determined). Upon arrival to its destination, the truck load will be weighed and recorded. During transport, bins will remain covered. If end dumps are used, the truck beds containing soil will be covered. The loaded trucks will proceed directly to the designated disposal facility. Once the bins are empty, the liner will be disposed and the bin rinsed/washed out at the landfill, where the rinsate will be properly handled.

5. Tentative Schedule

The construction for the Project is scheduled to commence in July 2019, and construction will continue for approximately 9 months following initial ground disturbance.

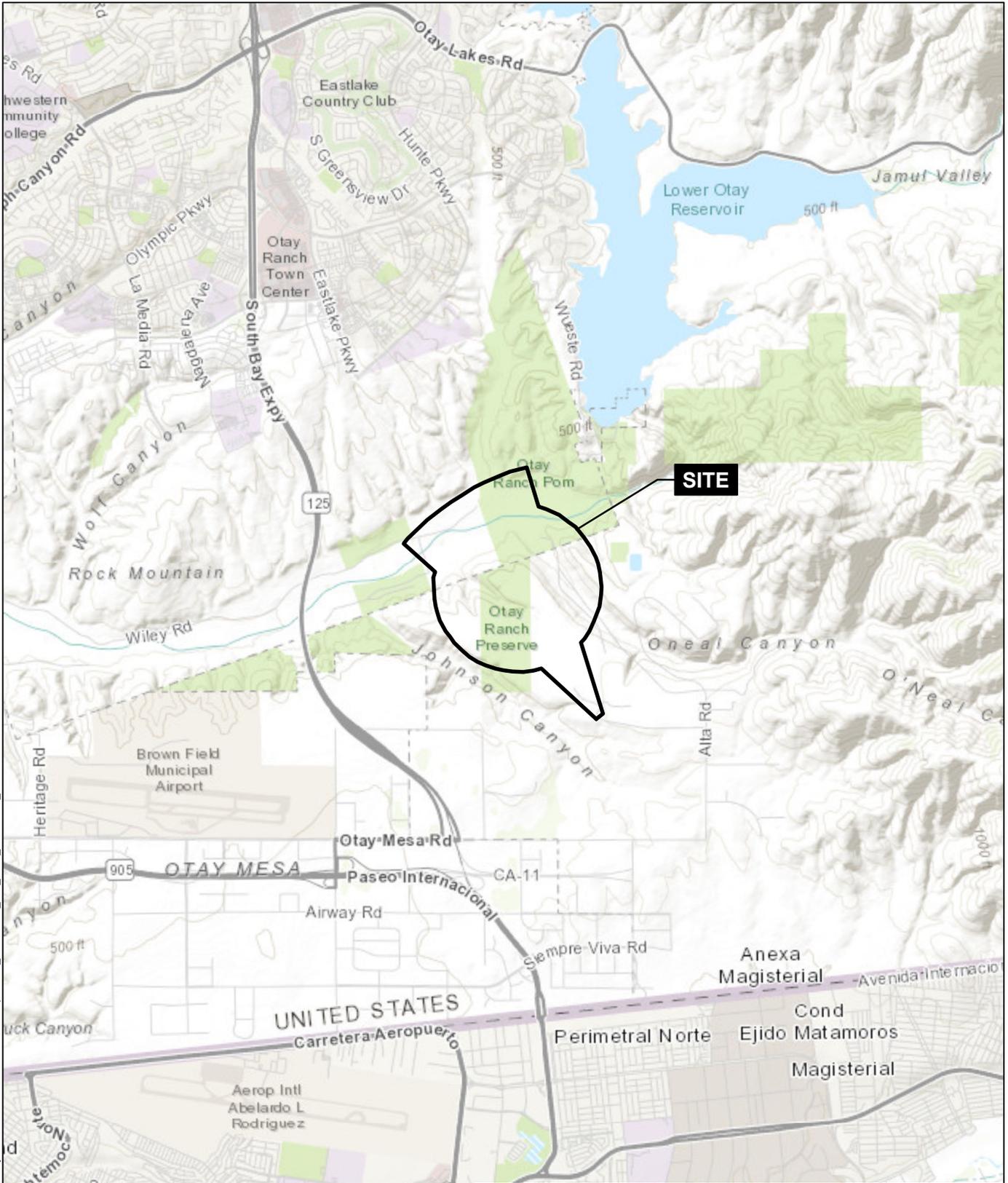
References

1. Horizon Water and Environment, LLC, 2018. Tie Line 649 Wood-to-Steel Replacement Project, Initial Study/Mitigated Negative Declaration Application 15-08-006. October.
2. Parsons, 2017. Final Site Inspection Report, Former Brown Field Bombing Range, San Diego County, California. December.

\\haleyaldrich.com\share\CF\Projects\133325\133325-002\Deliverables\SMP\2019_0611_HAI_SDGE_TL649_SMP_F.docx

FIGURES

GIS FILE PATH: \\haleyaldrich.com\share\CF\Projects\133325\002_GIS\Maps\2019_05\133325_002_PROJECT_LOCUS.mxd — USER: dfm — LAST SAVED: 5/10/2019 10:16:35 AM



MAP SOURCE: ESRI
 SITE COORDINATES: 32°35'30.8"N, 116°56'24.4"W

**HALEY
ALDRICH**

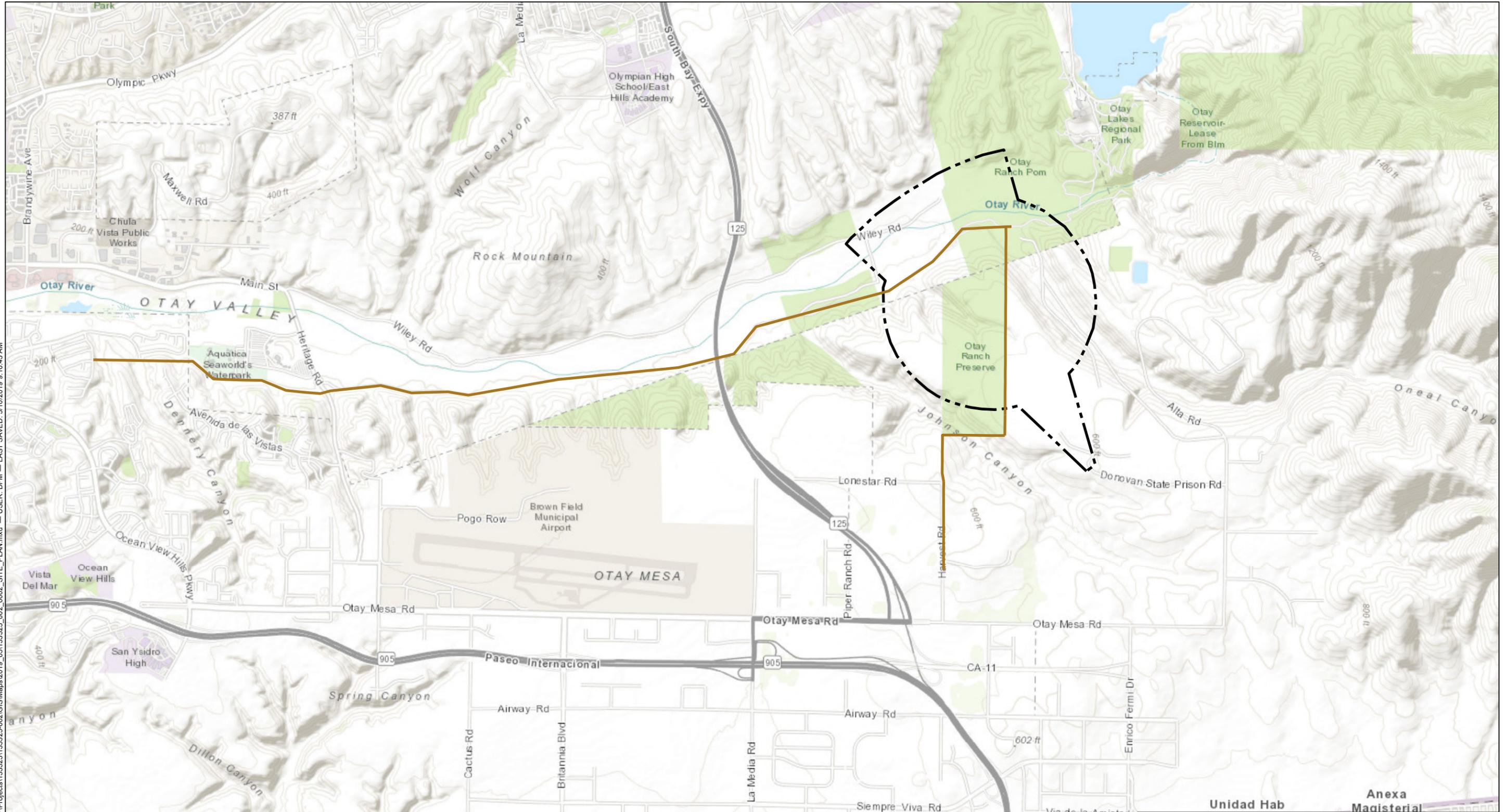
TIE LINE 649 WOOD-TO-STEEL REPLACEMENT
 SOUTHERN SAN DIEGO COUNTY, CALIFORNIA

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 5000 FT
 JUNE 2019

FIGURE 1

GIS FILE PATH: \\haleyaldrich.com\share\CF\Projects\133325\133325-002\GIS\Maps\2019_05\133325_002_0002_SITE_PLAN.mxd — USER: DFM — LAST SAVED: 5/10/2019 9:10:45 AM

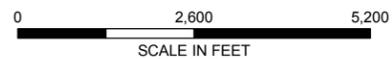


LEGEND

-  PROJECT ALIGNMENT
-  FORMERLY USED DEFENCE SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. TOPOGRAPHY SOURCE: ESRI



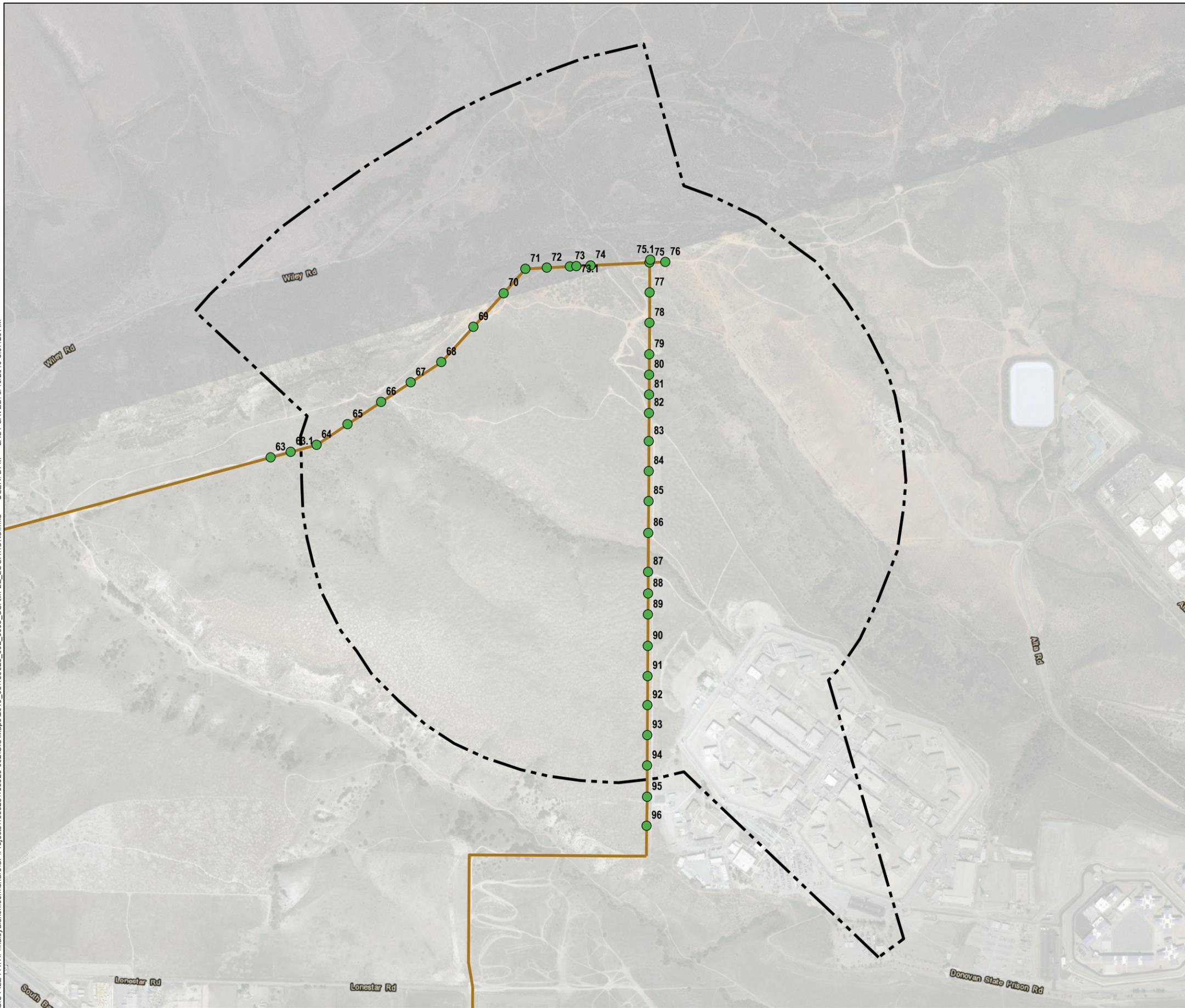
HALEY ALDRICH TIE LINE 649 WOOD-TO-STEEL REPLACEMENT SOUTHERN SAN DIEGO COUNTY, CALIFORNIA

PROJECT LOCATION MAP

JUNE 2019

FIGURE 2

GIS FILE PATH: \\haleyaldrich.com\share\CF\Projects\133325\133325-002\GIS\Maps\2019_05\133325_002_0003_SSAMPLE_LOCATIONS.mxd — USER: DFM — LAST SAVED: 5/10/2019 8:07:20 AM

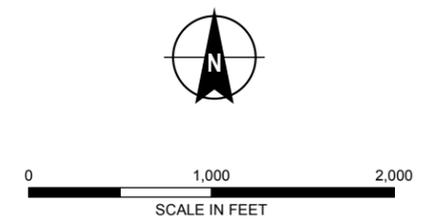


LEGEND

- SOIL SAMPLE/POLE IDENTIFICATION
- PROJECT ALIGNMENT
- FORMERLY USED DEFENCE SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AERIAL IMAGERY SOURCE: ESRI



HALEY ALDRICH TIE LINE 649 WOOD-TO-STEEL REPLACEMENT
SOUTHERN SAN DIEGO COUNTY, CALIFORNIA

SOIL SAMPLE LOCATIONS

JUNE 2019

FIGURE 3