SAN DIEGO GAS & ELECTRIC COMPANY

CLEVELAND NATIONAL FOREST
POWER LINE REPLACEMENT PROJECTS
SPILL RESPONSE AND NOTIFICATION PLAN

JUNE 2016

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PREPARED FOR:

SDGE

A Sempra Energy utility℠

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1 – INTRODUCTION

This Spill Response and Notification Plan (Plan) describes the measures to be taken by San Diego Gas & Electric Company (SDG&E) and its contractors in the event of a spill during construction of the Cleveland National Forest Power Line Replacement Projects (Project). The Project includes the following components:

- replacement of approximately 1,400 existing wood poles with fire-resistant, weathered steel poles;
- undergrounding of approximately 26 miles of existing 12 kilovolt (kV) distribution lines;
- removal of approximately 30 miles of existing 12 kV and 19 miles of existing 69 kV overhead facilities; and
- closure of approximately 24 miles of access roads.

The Plan was prepared in accordance with Mitigation Measure (MM) PHS-02 as described in the Project's Final Environmental Impact Report/Environmental Impact Statement's Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) and the United States (U.S.) Forest Service (USFS) Record of Decision, which includes minimum requirements for development of this Plan and implementation of the procedures to be followed in the field. This Plan was developed to address compliance with federal, state, and local regulations, as well as the requirements stipulated by the USFS and California Public Utilities Commission (CPUC) in the MMCRP. The Plan will pertain to all Project work areas.

2 – OBJECTIVES

The purpose of this Plan is to provide the SDG&E construction management team with a description of measures that will be implemented to address spills or accidental releases of hazardous materials and construction-related wastes that could occur during construction of the Project.

This Plan provides specific information for implementing mitigation measure requirements, as well as the means of monitoring the effectiveness of this Plan through implementation of control measures during Project construction. The management practices and activities in this Plan are intended to accomplish the following objectives:

- minimize the effect of inadvertent releases of hazardous materials, which could adversely impact human health or the environment; and
- provide for the proper handling, storage, and disposal of hazardous and non-hazardous waste that is used during construction of the Project.

3 – MITIGATION MEASURES

SDG&E's Construction Contractor will implement the procedures provided in this Plan, along with the applicable procedures described in Attachment A: Best Management Practice 2-03: Spill

Control and the Project's Storm Water Pollution Prevention Plans (SWPPPs)[1] regarding the proper storage, handling, and disposal of hazardous materials and Project wastes during Project construction. The Construction Contractor will take all reasonable precautions to prevent the release of any hazardous materials or the improper disposal of Project waste, including the implementation of the measures required by the CPUC in MM PHS-02 of the MMCRP.

3.0 MITIGATION MEASURE PHS-02

"San Diego Gas & Electric (SDG&E) shall implement best management practices (BMPs) to prevent impacts from release of hazardous materials during construction, operation, and maintenance activities. Typical BMPs could include, but would not be limited to, practices such as the use of absorbent pads for spill containment, specified locations for vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible. No hazardous material, as defined by 40 CFR 355, shall be stored on site above threshold planning quantities, as defined in Appendices A and B of 40 CFR 355. All vehicle maintenance activities shall be conducted off site at designated locations within approved staging areas or other locations specified for this activity. In the event emergency maintenance is required on site, or removal of the equipment to an off-site repair facility is determined by SDG&E to be infeasible, SDG&E will use BMPs to prevent the release of hazardous materials during these emergency maintenance activities. SDG&E will be required to complete a Spill Response and Notification Plan for agency approval before commencing construction."

4 – PLAN IMPLEMENTATION

4.0 SPILL RESPONSE MATERIALS

Although all efforts will be taken to prevent an inadvertent release of hazardous materials during construction of the Project, if a spill does occur, it may include any of the hazardous materials specified in the Project Final Environmental Impacts Report/Final Environmental Impact Statement. Hazardous materials utilized during the Project include, but are not limited to, diesel fuel, lubrication oil, transformer oil, antifreeze, transmission fluid, lubricating grease, paint, solvents, pesticides, and herbicides. The BMPs identified in Attachment A: Best Management Practice 2-03: Spill Control and the Project's SWPPPs will be implemented during construction to help reduce exposures to hazardous materials in the event of an inadvertent release. In addition, if an accidental release occurs, SDG&E's Construction Contractor will immediately implement the measures outlined in Section 4.3 Cleanup Procedures. These procedures will include the initial identification and assessment of any hazardous conditions, adequate containment of the material release, and proper cleanup of hazardous debris. Table 1: Cleanup Materials provides a list of suggested cleanup materials as well as suggested storage locations for these materials during construction of the Project.

[1] The Project's SWPPPs are currently being developed by Insignia Environmental.

Table 1: Cleanup Materials

Spill Supplies/Equipment	Suggested Location
Absorbent pads	Substation sites, contractor storage yards, crew trucks, and heavy equipment
Absorbent booms	Contractor storage yards, foreman trucks
Shovels	Substation sites, contractor storage yards, and crew trucks
Storage containers for potentially hazardous liquid and solid materials	Contractor storage yards
Gloves	Substation sites, contractor storage yards, and crew trucks
Aprons	Substation sites and contractor storage yards
Waste containers for disposal	Substation sites and contractor storage yards
Waterless hand cleaner	Substation sites and contractor storage yards
Rags (Shop or Cleaning)	Substation sites, contractor storage yards, and crew trucks
Paper towels	Substation sites, contractor storage yards, and crew trucks
Visqueen/heavy-duty plastic sheeting	Substation sites, contractor storage yards, and crew trucks

4.1 INITIAL IDENTIFICATION AND ASSESSMENT OF HAZARDS

Project personnel will be instructed to identify and report any hazardous conditions observed during construction activities to SDG&E's designated field representative, who will be assigned by SDG&E's Environmental Compliance Lead for whom contact information is provided in Attachment B: Emergency Contacts. Project personnel will receive instruction on reporting hazardous conditions during the initial Worker Environmental Awareness Program. Personnel will also be instructed to act in accordance with the following procedures:

- Work will be halted if an imminent hazard or danger to human health or the environment exists.
- Access to the release area will be restricted if necessary to avoid physical injury.
- The fire and/or police departments will be contacted if assistance is needed.

SDG&E's designated field representative will advise on whether the release site is safe to enter, and any injuries will be addressed and 911 will be called if emergency assistance is needed. If required, notification of the hazardous condition will be provided as soon as possible following the discovery of a spill or release, as described in Section 4.6 Notification Procedures.

4.2 CONTAINMENT OF HAZARDOUS MATERIALS

Containment of a hazardous material release will be performed only by properly trained Project personnel and will be conducted using the proper personal protective equipment, such as gloves,

goggles, and aprons. If containment can be safely implemented, the following general containment procedures will be employed:

- If the release is relatively small, absorbent pads will be applied to the surface of the release to absorb all of the liquid.
- If the release is of a larger quantity, earthen ditches or dikes will be constructed around the release site to prevent the discharge from flowing off site or into waterways.
- Discharge into storm drains or other storm water conveyance systems will be prevented by obstructing drains located in the area of the release with plastic and/or earthen dikes.
- Impacted soil will be covered with plastic sheeting to minimize and avoid the spread of hazardous substances during rain events.

If a release cannot be safely managed by Project personnel, a cleanup contractor will be contacted to contain, cleanup, and remediate, if necessary, the area in accordance with federal, state, and local requirements.

Other individuals and vehicles will be prevented from entering the release area until SDG&E's Hazardous Materials Specialist is able to assess the situation for safety. Following the completion of cleanup activities, waste materials will be placed in appropriate disposal containers, properly labeled, and stored in the designated hazardous materials staging area(s) in accordance with federal, state, and local regulations.

4.3 CLEANUP PROCEDURES

Once the release of a hazardous material has been contained in accordance with the procedures identified in Section 4.2 Containment of Hazardous Materials, the Construction Contractor will clean up the contaminated area by implementing the following measures:

- Absorbent materials and/or shovels will be used to remove as much free product from the soil or ground surface as possible.

- Based on the size of the spill and the discretion of the designated field representative and/or SDG&E's Hazardous Materials Specialist, larger equipment such as backhoes and rolloffs may be required to remove contaminated materials.

- Spills will not be diluted with water or other liquids for purposes of mitigating the spill. If the use of water or other liquids is necessary for final cleaning, the water or other liquids will be collected, properly labeled, and disposed of in accordance with all federal, state, and local regulations.

4.4 LABELING REQUIREMENTS

Compliance with codified labeling standards will be required for containers (including tanks) that are used for storing accumulated hazardous material and waste on the Project site. In

accordance with the requirements specified in Title 22 of the California Code of Regulations, Section 66262.34(f), hazardous waste labels will include the following information:

- Generator name and contact info (address and phone)
- Accumulation start date
- The words "Hazardous Waste" conspicuously displayed, and warning words (such as "flammable," "corrosive," or "reactive") indicating the particular hazardous characteristics of the waste
- The waste's physical state (e.g., solid or liquid)
- Brief description of contents
- Environmental Waste Identification Number (prior to transport of the hazardous waste to a disposal facility)
  - This number identifies each handler on hazardous waste manifests and other paperwork. The identification number enables regulators to track the waste from origin to final disposal ("cradle to grave"). These numbers are site-specific, and there must be only one number at a single address. If waste is generated at multiple addresses, each address will have a separate identification number.

The word "Empty" must be conspicuously displayed on empty containers and any container that previously held hazardous materials.

4.5 ACCUMULATION, STORAGE, AND REMOVAL

Hazardous waste may be accumulated on site in generator accumulation units (e.g., containers, tanks, drip pads, or containment buildings) in compliance with the applicable time limits specified in Section 25123.3 of the California Health & Safety Code (i.e., 90 days, 180 days, 270 days, or 365 days) (Section 66262.34). It is anticipated that the Project will generate varied monthly volumes of hazardous waste during construction and may qualify as a large quantity generator during some periods. Accordingly, SDG&E will typically follow large quantity generator management requirements, including, obtaining State and/or federal Hazardous Waste Generator Identification Numbers as appropriate, storing hazardous waste for no more than 90-days in a properly marked hazardous waste storage area and properly training personnel that manage hazardous waste. It is not anticipated that SDG&E will generate any acutely hazardous waste during construction.

If hazardous waste is accumulated in containers, a generator must comply with Title 22, Division 4.5, Chapter 15, Article 9 (Use and Management of Containers) of the California Code of Regulations. These requirements include the following:

- Placing containers holding ignitable or reactive wastes at least 15 meters (50 feet) from the facility's property line (Section 66265.176).

- Maintaining an inventory of hazardous wastes accumulated on site as required by California HSC. Chapter 6.95

- Not placing incompatible waste streams into the same container (Section 66265.177).

- Separating a container holding a hazardous waste that is incompatible with any waste or other materials transferred or stored nearby in other containers, piles, open tanks, or surface impoundments from the other materials or protecting them by means of a dike, berm, wall, or other device (Section 66265.177).

Maintaining all containers so that they are:

- in good condition (Section 66265.171);
- compatible with contents (Section 66265.172);
- closed, except when adding or removing hazardous waste (Section 66265.173);
- managed to avoid rupture or leaks (Section 66265.173);
- inspected weekly (Section 66265.174); and
- properly labeled (Section 66262.34).

When shipping hazardous waste totaling more than 50 pounds or five gallons off site, SDG&E and its contractor shall:

- Use only transporters, and transfer, treatment, storage and disposal facilities (if located in California) that are registered or permitted by Department of Toxic Substances Control (DTSC) and have obtained an ID number (Section 66262.12).

- Comply with U.S. Department of Transportation (DOT) requirements for packaging, labeling, and marking and ensure that the transport vehicle is correctly placarded (Section 66262.32).

- Use a California Hazardous Waste Manifest, DTSC Form 8022A, unless the receiving state requires otherwise. A manifest is the paperwork that accompanies hazardous waste from the point of generation to the point of ultimate treatment, storage, or disposal.

4.6 NOTIFICATION PROCEDURES

Notification procedures for reportable spills or releases that occur during Project construction will conform to applicable federal, state, and local laws. Generally, a release is reportable if it is significant (i.e. exceeds a minimum reporting threshold quantity) or it poses a significant present or threatened hazard to human health and safety or to the environment. Adherence to these procedures will be the first priority following the initial safety and spill response actions. If a spill is reportable to any agency, notification will be provided as soon as possible to the CPUC, USFS, and required agencies after the details of the spill or release are known. The notification will include the information described in Attachment C: Spill or Release Notification, which also includes general reporting requirements for a reportable release of hazardous materials. The individual who discovers the spill will immediately report it to SDG&E's designated field representative, who will be SDG&E's main point of contact at the construction sites and will

coordinate with SDG&E's designated Hazardous Materials Specialist. When communicating with SDG&E's designated field representative regarding the spill, the individual who discovered the spill will provide the following details:

- the name and contact number of the individual who discovered the spill;
- the time and date that the spill occurred;
- the spill location, including landmarks and the nearest access route;
- the type and estimated quantity of hazardous materials involved;
- the source and cause of the release, if known;
- potential threats to human health and safety (e.g., fire, explosion, or other hazards), as well as any known injuries;
- any potential threats to property and environmental resources, particularly to streams and waterways; and
- the status of the response actions taken to stop and/or contain the release.

SDG&E's designated field representative will notify the designated Hazardous Materials Specialist about the spill, and will contact emergency service providers, if necessary. The designated field representative or SDG&E Environmental Specialist and/or the designated Hazardous Materials Specialist will then notify the appropriate regulatory agencies, as required. As previously discussed, an emergency contact list is provided in Attachment B: Emergency Contacts.

The procedures outlined in Table 2: Spill Notification Procedures will be followed to ensure that appropriate agency notifications are made. If a reportable quantity (RQ) of material is released, the California Office of Emergency Services (Cal OES) and the County of San Diego Department of Environmental Health (DEH) (i.e., a Certified Unified Program Agency) will be immediately notified. In addition, a written report to Cal OES will be submitted within 30 days, as appropriate.[2] Records and test reports (if required) will be retained with the Project files for at least three years, and then will be archived.

[2] Safety Data Sheets (SDS) will be consulted and the location of the release will be considered when identifying RQs.

Table 2: Spill Notification Procedures

Spill Characteristics	Notification Procedure
In the event of a spill or release of hazardous materials at any of the Project storage or work areas	The individual who observed the spill will notify SDG&E's designated field representative to ensure spills or releases are documented. SDG&E's designated field representative will notify the SDG&E Environmental Specialist and/or designated Hazardous Materials Specialist, who will notify the appropriate agencies, as required.
In the event of a spill exceeding RQs (i.e., 42 gallons for oil) that is also outside of a containment system, a spill that reaches jurisdictional waters, or a spill that poses a threat to human health or the environment	SDG&E's Environmental Specialist and/or designated Hazardous Materials Specialist will notify the appropriate agencies based on federal, state, and local law. All spills exceeding RQs should be reported to the California Office of Emergency Services (OES) State Warning Center. Contact information for applicable federal and state agencies is provided in Attachment B: Emergency Contacts.
If a spill or threatened discharge is or will be greater than or equal to an RQ (i.e., 42 gallons for oil); or it occurs within waters of the State, or to the ground within 500 feet of a surface water, well, or domestic water supply source; or it causes pollution of surface water or groundwater, a nuisance, or a potential threat to public health	SDG&E's Environmental Specialist and/or designated Hazardous Materials Specialist will notify the Regional Water Quality Control Board and the National Response Center.
If the spill occurs on a State of California highway	SDG&E's Environmental Specialist and/or designated Hazardous Materials Specialist will notify the California Highway Patrol.
If the spill violates conservation measures stipulated in the Project's wildlife permits	SDG&E's Environmental Specialist and/or designated Hazardous Materials Specialist will notify the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service, as required by the Project permits.

5 – REFERENCES

California HSC. Chapter 6.95 Article 1. Online. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.95.&article=1. Site visited December 17, 2015.

California HSC. Chapter 6.95 Article 2. Online. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.95.&article=2. Site visited December 17, 2015.

County of San Diego DEH. Hazardous Materials Business Plan (HMBP). Online. http://www.sdcounty.ca.gov/deh/hazmat/hazmat.html. Site visited December 17, 2015.

Department of Toxic Substances Control. 2015. California Code of Regulations, Title 22, Division 4.5. Online. https://www.dtsc.ca.gov/LawsRegsPolicies/Title22/. Site visited December 17, 2015.

Dudek. 2015. Final Environmental Impact Report/Environmental Impact Statement for the Master Special Use Permit and Permit to Construct Power Line Replacement Projects. Online. http://www.cpuc.ca.gov/environment/info/dudek/CNF/Final-EIR-EIS.htm. Site visited December 11, 2015.

SDG&E Best Management Practices Manual for Water Quality Construction. July 2011.

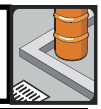
ATTACHMENT A: BEST MANAGEMENT PRACTICE 2-03: SPILL CONTROL

MANUAL

BEST MANAGEMENT PRACTICES MANUAL FOR WATER QUALITY CONSTRUCTION

Geosyntec Project No. SW0186

December 2010, Rev 2- Geosyntec Consultants
Revised July 2011, San Diego Gas & Electric Environmental Services Department



What

Spill Control is a procedural BMP used to control, contain, and clean-up spills on site so that storm water run-on and runoff and non-storm water discharges do not become contaminated.

When

This BMP applies to all personnel present at construction and operations and maintenance activity sites at all times. Spill control procedures are implemented anytime chemicals (liquid or solid form) and/or hazardous materials and/or wastes are handled, used or stored. A single handling, use, or storage of a hazardous material or waste is sufficient to trigger this requirement. Such substances may include, but are not limited to fuels, lubricants, solvents, fertilizers, pesticides, herbicides, soil binders, coolants, paints, and sewage.

To the extent that work can be accomplished safely, spills of materials or chemicals shall be contained and cleaned up immediately.

Where

All construction and operations and maintenance activity sites where chemicals and/or hazardous materials and/or wastes are handled, used, or stored.

How

- Install and maintain spill control and cleanup kits in areas where any chemicals and/or hazardous materials and/or waste are handled, used and/or stored.
- Construction Supervisor, Crew Foreman, or Facility Supervisor and sufficient onsite personnel should be trained in spill control to address potential spills on the site.
- Only staff trained on spill response procedure should be used to control spill.
- If the spill is a threat to life or the environment, or other emergency situation where emergency medical support, fire department response, or outside assistance is needed, ***immediately*** call the **911** Operator and the local emergency response agency (usually the local fire department). Then, promptly call **Service Dispatch (Trouble) @ (619) 725-5100** and your supervisor.
- For all spills ***immediately*** notify the acivity and site supervisor ***and***/or the Field Environmental Representative and describe the spill and current situation. The Field Environmental Representative will make any required regulatory agency notifications per Environmental Standard (ES) G7841 and the Company's Release Reporting Scenario Guidance available on the Environmental Services Department website.
- If possible, and if you have proper training and personal protective equipment, stop the flow of the spill. If it can be done safely, contain the spill to a confined area. Containment may be able to be accomplished with:
    - Earthen berms
    - Sand bags
    - Absorbent booms
    - Absorbent socks

  Containment material on site as part of the Spill Kit should reflect site characteristics. For guidance, request assistance from the Field Environmental Representative.
- To the extent that it doesn't compromise cleanup activities, spills shall be covered and protected from storm water run-on/-off during rain events.

How (cont.)

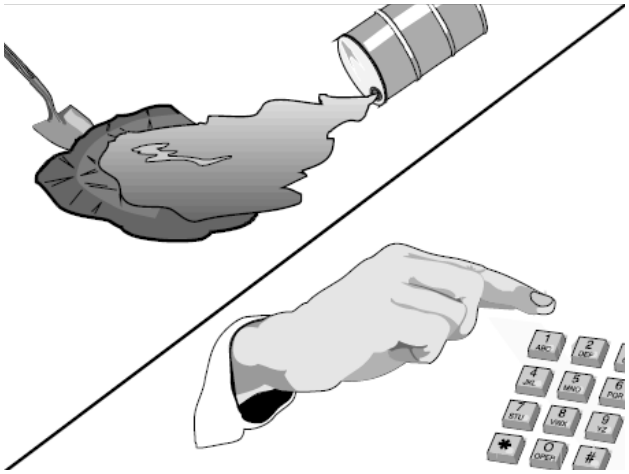
- Immediately clean the impacted area, and properly dispose of any impacted materials.
  - Spills shall not be buried, except as necessary for immediate interim containment purposes. Spilled material and impacted burial material must be removed as soon as possible after proper control and containment and properly disposed of.
  - Use absorbent materials on spills to thoroughly clean up the material to the maximum extent possible. Spills shall not be diluted with water or other liquid for purposes of mitigating the spill (the solution to pollution is not dilution). When it is necessary to use water or other liquid for final cleaning and decontamination of a spill, the water or other liquid shall not be allowed to enter storm drain inlets, drainages, or watercourses, and shall be collected and disposed of properly. Coordinate disposal of these wastes with the Field Environmental Representative.

    Used clean up materials, contaminated materials, and recovered spill material shall be stored and disposed of in accordance with federal, state and local regulations and BMP 2-05 "Hazardous Materials/Waste Management."

Maintenance and Inspection

- Perform routine inspections to verify that spill control clean-up materials are located near material storage, unloading, and use areas prior to and after each storm event, daily during extended rain events during the construction and/or clean-up activity (e.g., weekly, or in compliance with the frequency specified in the project specific SWPPP, if applicable).

Pictures



Corresponding CASQA Fact Sheet

Fact Sheet WM-4

ATTACHMENT B: EMERGENCY CONTACTS

Due to its confidential nature, Attachment B: Emergency Contacts has been removed.

ATTACHMENT C: SPILL OR RELEASE NOTIFICATION

SPILL OR RELEASE NOTIFICATION

In the event of a spill, have the following information available

State and Local Notification:

1. **Name of business:** _____
2. **Identity of caller:** _____
3. **Chemical name and quantity released (if known):**

   _____
4. **Description of what happened:** _____

   _____

   _____

   _____
5. **Was the release contained? Yes No**

Please describe if release entered any waterway or storm drains:

_____

6. **Information about the spill, release or threatened release:**
   a. **Location:** _____
   b. **Date:** ____/____/____
   c. **Time:** _____
   d. **Injuries or Fatalities?** _____
   e. **Evacuation conducted?** _____
   f. **Clean-up by:** _____

Federal Notification:

Federal Notification required additional information for spills (CERCLA chemicals) that exceed federal reporting requirements, which includes:

a. **Medium or media impacted by the release**
b. **Time and duration of the release**
c. **Proper precautions to take**
d. **Known or anticipated health risks**
e. **Name and phone number for more information**