2.7 Hazards and Hazardous Materials

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
7.	**HAZARDS AND HAZARDOUS MATERIALS Would the project:**				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☒	☐	☐

Setting

Materials and waste may be considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode or generate vapors when mixed with water (reactivity). The term "hazardous material" is defined in law as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment.[1] In some cases, past industrial or commercial uses on a site can result in spills or leaks of hazardous materials and petroleum to the ground; thus resulting in soil and groundwater contamination. Federal and State laws require that soils having concentrations of contaminants such as lead, gasoline, or industrial solvents that are higher than certain acceptable levels must be handled and disposed as hazardous waste during excavation, transportation, and disposal. The

1 State of California, Health and Safety Code, Chapter 6.95, Section 25501(o).

California Code of Regulations (CCR), Title 22, Section 66261.20-24 contains technical descriptions of characteristics that would cause a soil to be classified as a hazardous waste. The use of hazardous materials and disposal of hazardous wastes are subject to numerous laws and regulations at all levels of government.

In addition to toxic substances, the California Public Utilities Commission (CPUC) generally provides information about electric and magnetic fields (EMF) in its environmental documents, including this Mitigated Negative Declaration, to inform the public and decision makers; however, it does not consider EMF, in the context of CEQA, as an environmental impact because there is no agreement among scientists that EMF creates a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMF. For informational purposes, additional information about EMF generated by transmission lines and substations is provided in Appendix A.

Existing Environment

Existing Contamination

The Proposed Project study area is located in rural Del Norte County in an area that is currently undeveloped and on a site that was a former lumber mill. To assess the potential for contamination to exist in the Proposed Project study area, Environmental Data Resources Inc. (EDR) was directed to conduct a regulatory database search of sites, adjacent to and in the vicinity of the existing Simonson Substation site and the proposed Morrison Substation site, that are listed on agency files for the documented use, storage, generation, or releases of hazardous materials and/or petroleum products (EDR, 2007). The database search process reviews dozens of lists generated by federal, State, county, and/or city regulatory agencies for historically contaminated properties, and for businesses that use, generate, or dispose of hazardous materials or petroleum products in their operation. In addition, the database search reviews lists of active contaminated sites that are currently undergoing monitoring and remediation.

The database search identified no contamination sites at either the existing or proposed substation locations; however, the database search mapped two sites within one mile of the target search point, which was the proposed Morrison Creek Substation site (see Table 2.7-1). The two sites are referred to as the Simonson No. 2 site and the Simpson Timber Smith River site. The EDR report identifies the Simonson No. 2 site as a Class III (non-hazardous) solid waste landfill facility that poses a minor threat to water quality. The EDR report presents limited information about the Simpson Timber Smith River site, but notes that the North Coast Regional Water Quality Control Board (NCRWQCB) should be contacted for the status of the site. The NCRWQCB was contacted by Environmental Science Associates and confirmed that the Simpson Timber site is an active NCRWQCB site (Site No. 1TDN007) with the constituents of concern being dioxins (NCRWQCB, 2007). However, the NCRWQCB indicated that the extent of contamination appears to be localized to the area where the mill use to exist, no closer than approximately 200 feet east of the existing Simonson Substation site.

TABLE 2.7-1
HAZARDOUS MATERIALS RELEASE SITES MAPPED IN THE VICINITY OF THE STUDY AREA

Site Name	Site Address	Direction from Project[a]	Regulatory Lists	Status
Simonson No. 2	U.S. Highway 101	Approximately 450 feet northwest of the existing Simonson Substation and 1,500 feet northwest of the proposed Morrison Creek Substation site.	Waste Management Unit Database administered by the State Water Resources Control Board.	Not Reported.
Simpson Timber, Smith River	U.S. Highway 101	Approximately 2,000 feet east-northeast of the existing Simonson Substation and 1,800 feet north-northeast of the proposed Morrison Creek Substation site.	Cortese list database administered by the California Environmental Protection Agency/Office of Emergency Information.	Ongoing Investigation.

[a] The EDR report included distances which were determined to be slightly inaccurate. This column provides accurate representation of actual site locations in relation to the existing Simonson Substation site and the proposed Morrison Creek Substation site.

SOURCE: EDR, 2007 and SHN, 2007a.

SHN Consulting Engineers & Geologists, Inc. (SHN) conducted Phase 1 Environmental Site Assessments for the proposed Morrison Creek Substation site (SHN, 2007a) and for the existing Simonson Substation site (SHN, 2007b). The Phase 1 reports indicate that dioxins and furans compounds associated with the former Simpson Timber site have impacted soil and groundwater approximately 900 feet from the proposed Morrison Creek Substation site and approximately 200 feet from the existing Simonson Substation site; however, based on soil and groundwater investigations, SHN has concluded that the former releases are not considered a hazardous materials threat to the subject sites (SHN, 2007a and 2007b).

The findings of the Phase I investigation for the proposed Morrison Creek Substation site revealed that the site has been vacant for several years, and that the site was previously used as a log pond, a lumber storage yard, and a lumber transfer yard. Records also indicate that motor oil was previously stored in 55-gallon drums and gasoline was stored in above ground storage tanks on the southeast portion of the site, in secondary containment areas. A site visit by SHN revealed no evidence of a hazardous materials release at this former storage area. However, partially buried building materials confined to the top six inches of the soil were observed discontinuously distributed over an area approximately 120 feet by 15 feet during the site visit. SHN does not consider the building materials to pose a threat of release of hazardous substances to the proposed substation site. SHN does not recommend any future investigative work at the proposed substation site, but recommended that the buildings materials be disposed of appropriately (SHN, 2007a).

The findings of the Phase I investigation for the existing Simonson Substation site found no evidence of storage or release of polychlorinated biphenyls (PCBs) or other chemicals at the site and a site visit conducted by SHN found no evidence of surface contamination at the site. SHN does not recommend any future investigative work at the existing substation site (SHN, 2007b).

Wood Treatment Products

The existing transmission line tap poles and Simonson Substation support poles are likely treated with chemicals that may include pentachlorophenol, creosote, and chromated copper arsenate. These chemicals are used in pressure treated wood to protect wood from rotting due to insects and microbial agents. For certain uses and quantities, these chemicals can be considered to be hazardous materials, which require specific handling procedures prescribed by State and federal regulations. These chemicals are typically applied to wood transmission line poles by the manufacturer at their facility and are let to set and dry prior to installation and/or use of the poles. When the chemicals have dried, leaching from the wood into the environment is generally considered to be negligible. Additionally, the base of the tap poles may be wrapped with copper naphthenate paper, also known as CuNap wrap.[2] This paper has been accepted as a wood preservative for several decades and has been employed in nonpressure treatments of wood and other products. Copper naphthenate is a common preservative and its use has increased recently in response to environmental concerns associated with other wood treatment products.

Polychlorinated Biphenyls

PCBs are a group of man-made organic chemicals that contain over 200 individual compounds with varying harmful effects. PCBs have historically been used as coolants and lubricants in transformers and other electrical substation equipment. A small amount of PCBs may dissolve in water, but most tend to bind to particles and sediments. Potential human exposure to PCBs may occur through inhalation of contaminated air and through direct contact with contaminated soils, resulting in irritation. As described above, no evidence exists that indicates that storage or release of PCBs has occurred at the existing Simonson Substation site.

Airports

The nearest airport to the Proposed Project study area is Jack NcNamara Field Airport, which is located approximately 11 miles to the south-southwest of the study area. There are no private or public airstrips in the vicinity of the study area.

Wildland Fire Conditions

The Proposed Project study area currently consists of pavement, gravel, the Simonson Substation, and grassland interspersed by weedy scrub habitat and trees. Mixed hardwood forest is located south and east of the study area. The California Department of Forestry and Fire Protection (Cal-Fire) has identified Fire Hazard Severity Zones in State Responsibility Areas located in Del Norte County. Fire Hazard Severity Zones are identified based on a combination of fuel availability, weather, and topographic characteristics that affect fire severity and behavior. On a scale from moderate to very high, Cal-Fire has designated the entire study area as a very high Fire Hazard Severity Zone (Cal-Fire, 2007).

2 CuNap wrap is a self contained delivery system for copper napthenate, the internationally recognized wood preservative that fights the damaging effects of moisture, decay and insect attack.

Regulatory Context

Table 2.7-2 provides a brief overview of federal and State laws and regulations with a more detailed discussion to follow.

TABLE 2.7-2
FEDERAL AND STATE LAWS AND REGULATIONS REGARDING HAZARDOUS MATERIALS

Hazardous Materials Management	State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These laws require hazardous materials users to prepare written plans, such as Hazard Communication Plans, Hazardous Materials Business Plans, and Chemical Hygiene Plans. Laws and regulations require hazardous materials users to store these materials appropriately and to train employees to manage them safely. A number of agencies participate in enforcing hazardous materials management requirements.
Hazardous Waste Handling	The California Department of Toxic Substances Control (DTSC) regulates the generation, transportation, treatment, storage, and disposal of hazardous material waste. These laws impose "cradle-to-grave" regulatory systems that require generators of hazardous materials waste to handle it in a manner that protects human health and the environment to the extent possible. The DTSC permits and oversees hazardous materials waste treatment, long-term storage, and disposal facilities.
Hazardous Materials Transportation	The U.S. Department of Transportation (U.S. DOT) regulates the transportation of hazardous materials between states. Within California, the State agencies with primary responsibility for enforcing federal and State regulations, and for responding to transportation emergencies, are the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans). Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications. Although special requirements apply to transporting hazardous materials, requirements for transporting hazardous waste are more stringent, and hazardous waste haulers must be licensed to transport hazardous waste on public roads.
Soil and Groundwater Contamination	The Comprehensive Environmental Response, Compensation, and Liability Act and associated Superfund Amendments provide the USEPA with the authority to identify hazardous sites, to require site remediation, and to recover the costs of site remediation from polluters. California has enacted similar laws intended to supplement the federal program. The DTSC is primarily responsible for implementing California's Superfund Law.
Emergency Response	California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local government and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (OES), which coordinates the responses of other agencies, including Cal EPA, CHP, the Department of Fish and Game (CDFG), the RWQCB, and the local fire department.

State

Soil Contamination

Soils having concentrations of contaminants higher than certain acceptable levels must be handled and disposed as hazardous waste when excavated. The California Code of Regulations, Title 22, Section 66261.20-24 contains technical descriptions of characteristics that would classify a soil as a hazardous waste.

Hazardous Materials Management

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires that businesses handling hazardous materials prepare a business plan. In January 1996, Cal EPA adopted regulations implementing a Unified Hazardous Waste

and Hazardous Materials Management Regulatory Program (Unified Program). The program has six elements: hazardous waste generators and hazardous waste on-site treatment; underground storage tanks; above ground storage tanks; hazardous materials release response plans and inventories; risk management and prevention programs; and Unified Fire Code hazardous materials management plans and inventories. The plan is implemented at the local level, and the agency responsible for the implementation of the Unified Program is called the Certified Unified Program Agency (CUPA).

Hazardous Waste Management and Handling

Under the Resource Conservation and Recovery Act (RCRA), individual states may implement their own hazardous waste programs in lieu of RCRA as long as the state program is at least as stringent as federal RCRA requirements. The U.S. Environmental Protection Agency (USEPA) must approve state programs intended to implement federal regulations. In California, Califorina Environmental Protection Agency (Cal EPA) and DTSC, a department within Cal EPA, regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. The USEPA approved California's RCRA program, called the Hazardous Waste Control Law (HWCL), in 1992. DTSC has primary hazardous material regulatory responsibility, but can delegate enforcement responsibilities to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the HWCL.

The hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe the management of hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in ordinary landfills. Hazardous waste manifests must be retained by the generator for a minimum of three years. Hazardous waste manifests provide a description of the waste, its intended destination, and regulatory information about the waste. A copy of each manifest must be filed with the state. The generator must match copies of hazardous waste manifests with receipts from treatment, storage, and disposal facilities.

Contaminated soils and other hazardous materials removed from a site during construction or remediation may need to be handled as hazardous waste.

Hazardous Materials Transportation

The State of California has adopted U.S. Department of Transportation (U.S. DOT) regulations for the intrastate movement of hazardous materials; State regulations are contained in 26 California Code of Regulations (CCR). In addition, the State of California regulates the transportation of hazardous waste originating in the State and passing through the State (26 CCR). Both regulatory programs apply in California.

The two State agencies with primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans). The CHP enforces hazardous material and hazardous waste labeling and packing regulations to prevent leakage and spills of

material in transit and to provide detailed information to cleanup crews in the event of an accident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are the responsibility of the CHP, which conducts regular inspections of licensed transporters to assure regulatory compliance. Caltrans has emergency chemical spill identification teams at as many as 72 locations throughout the State that can respond quickly in the event of a spill.

Common carriers are licensed by the CHP, pursuant to California Vehicle Code Section 32000. This section requires the licensing of every motor (common) carrier who transports, for a fee, in excess of 500 pounds of hazardous materials at one time, and every carrier, if not for hire, who carries more than 1,000 pounds of hazardous material of the type requiring placards.

Every hazardous waste package type used by a hazardous materials shipper must undergo tests that imitate some of the possible rigors of travel. Every package is not put through every test. However, most packages must be able to be kept under running water for a time without leaking; dropped, fully loaded, onto a concrete floor; compressed from both sides for a period of time; subjected to low and high pressure; and frozen and heated alternately.

Hazardous Materials Emergency Response

Pursuant to the Emergency Services Act, California has developed an Emergency Response Plan to coordinate emergency services provided by federal, State, and local governmental agencies and private persons. Response to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (OES). The OES coordinates the responses of other agencies, including the USEPA, CHP, California Department of Fish and Game (CDFG), the Regional Water Quality Control Boards (RWQCBs), the local air pollution control districts (in this case, the North Coast Unified Air Quality Management District (NCUAQMD)), and local agencies.

Pursuant to the Business Plan Law, local agencies are required to develop “area plans” to respond to releases of hazardous materials and wastes. These emergency response plans depend to a large extent on the Business Plans submitted by people who handle hazardous materials. An area plan must include pre-emergency planning and procedures for emergency response, notification, and coordination of affected governmental agencies and responsible parties, training, and follow up.

Local

The Del Norte County Health Department’s role is to protect the health and welfare of the general public through prevention and control of disease and pollutants. In the event of a hazardous materials release or spill, the Del Norte County Fire Department would be the first responders (SWMA, 2007). The closest hazardous materials response team to the Proposed Project study area is the Eureka Fire Department Regional Hazardous Material Response Team (HMRT), which is located approximately 90 miles to the south of the study area. The HMRT provides response services for emergencies involving hazardous materials. The HMRT is funded primarily through a Joint Powers Agreement between Humboldt County, Del Norte County, City of Eureka,

City of Crescent City, City of Arcata, City of Blue Lake, City of Ferndale, City of Rio Dell, and City of Trinidad (City of Eureka, 2007).

Del Norte County General Plan

The *Del Norte County General Plan* includes several fire hazards and hazardous materials policies that may be applicable to the Proposed Project, including (Del Norte County, 2003):

Fire Hazards

Policy 2.E.3: The County should avoid development in areas identified as high or extreme fire hazard areas when possible. Where such development is permitted, structures located in extreme or high fire hazard areas should be construed with fire-resistant materials, utilizing fire-resistant design standards, and the surroundings should be irrigated.

Policy 2.E.4: Projects which encroach into areas which are determined to have a high or extreme fire hazard shall be reviewed by the appropriate fire agency to determine if special fire prevention measures are advisable.

Policy 2.E.6: The County shall require development within State Responsibility Areas in Del Norte County to conform to the fire safe standards adopted by the County and approved by the California Division of Forestry.

Hazardous Materials

Policy 2.F.3: The County shall require that new hazardous waste facilities and those commercial and industrial land uses that use or produce hazardous materials or waste are sited in an appropriate manner to maintain an acceptable level of risk.

Policy 2.F.4: The County shall continue to maintain a hazardous materials response capability for the control and cleanup of hazardous materials releases and accidents.

Hazards and Hazardous Materials Impacts and Mitigation Measures

a) Hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials: *Less than significant with mitigation.*

During Proposed Project construction activities, limited quantities of miscellaneous hazardous substances, such as gasoline, diesel fuel, hydraulic fluid, solvents, oils, etc. would be used to fuel and maintain vehicles and motorized equipment. Accidental spill of any of these substances could impact water and/or groundwater quality. Temporary bulk above-ground storage tanks may be used for fueling and maintenance purposes. As with any liquid, during handling and transfer from one container to another, the potential for an accidental release would exist. Depending on the relative hazard of the material, if a spill were to occur of significant quantity, the accidental release could pose a hazard to construction workers and the public, as well as the environment. While the Proposed Project would not require long-term operational use, storage, treatment, disposal, or transport of significant quantities of hazardous materials, hazardous materials would be used during Proposed Project construction activities.

Impact 2.7-1: Construction would require the use of certain materials such as fuels, oils, solvents, and other chemical products that, in large quantities, could pose a potential hazard to the public or the environment if improperly used or inadvertently released. *Less than significant with mitigation*.

Mitigation Measure 2.7-1a: PacifiCorp and/or its contractor(s) shall implement construction best management practices including but not limited to the following:

- Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction;
- Avoid overtopping construction equipment fuel gas tanks;
- Use tarps and adsorbent pads under vehicles when refueling to contain and capture any spilled fuel;
- During routine maintenance of construction equipment, properly contain and remove grease and oils; and
- Properly dispose of discarded containers of fuels and other chemicals.

Mitigation Measure 2.7-1b: PacifiCorp shall prepare a *Hazardous Substance Control and Emergency Response Plan* (Plan) and implement it during construction to ensure compliance with all applicable federal, State, and local laws and guidelines regarding the handling of hazardous materials. The Plan shall prescribe hazardous material handling procedures to reduce the potential for a spill during construction, or exposure of the workers or public to hazardous materials. The Plan shall also include a discussion of appropriate response actions in the event that hazardous materials are released or encountered during excavation activities. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities.

Mitigation Measure 2.7-1c: PacifiCorp shall prepare and implement a *Health and Safety Plan* to ensure the health and safety of construction workers and the public during construction. The Plan shall include information on the appropriate personal protective equipment to be used during construction. In addition, the Plan shall address emergency medical services in the case of an emergency. The Plan shall list procedures and specific emergency response and evacuation measures that would be required to be followed during emergency situations. PacifiCorp shall prepare the Plan and distribute it to all construction crew members involved in the project prior to construction and operation of the Proposed Project.

Mitigation Measure 2.7-1d: PacifiCorp shall establish and implement a *Workers Environmental Awareness Plan* (WEAP) to communicate environmental concerns and appropriate work practices to all construction field personnel. The training program shall emphasize site-specific physical conditions to improve hazard prevention, and shall include a review of the *Health and Safety Plan* and the *Hazardous Substance Control and Emergency Response Plan*. PacifiCorp shall submit documentation to the CPUC mitigation monitor prior to the

commencement of construction activities that each worker on the Proposed Project has undergone this training program.

Mitigation Measure 2.7-1e: PacifiCorp shall ensure that oil-absorbent material, tarps, and storage drums shall be used to contain and control any minor releases. Emergency spill supplies and equipment shall be kept at the Proposed Project staging area and adjacent to all areas of work, and shall be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the *Hazardous Substance Control and Emergency Response Plan* (see Mitigation Measure 2.7-1b), which shall be implemented during construction.

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b) Hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment: *Less than significant with mitigation.*

Construction

It is not anticipated that construction or operation of the Proposed Project would create a significant hazard to the public due to project upset or accidental release of hazardous materials into the environment. Accidental release of hazardous materials routinely used during construction activities are addressed under Impact 2.7-1, above. No contamination has been identified at the proposed Morrison Creek substation or existing Simonson Substation sites, although known dioxide and furan contamination exists approximately 900 feet from the proposed Morrison Creek Substation site and approximately 200 feet from the existing Simonson Substation site. Given the geotechnical studies conducted by SHN at the Proposed Project study area, SHN has concluded that it would be unlikely that contamination associated with these sites would be encountered during Proposed Project construction activities. Therefore, the potential release and mobilization of previously identified and unidentified hazardous materials would be relatively low.

In addition, PacifiCorp would identify and determine the extent of any existing PCB-contaminated soil at the Simonson Substation site in accordance with the USEPA grid sampling method developed for releases of oil potentially containing PCBs. If necessary, a remediation plan would be developed and executed based on the analytical sampling results (see Project Description Section 1.5.3, *Construction*).

Moreover, pursuant to Mitigation Measure 2.7-1c (above), PacifiCorp would implement appropriate safety measures to ensure the safety of construction workers. In addition, implementation of Mitigation Measure 2.7-2 (below) would ensure that potential impacts associated with releasing previously unidentified hazardous materials into the environment would be less than significant.

Impact 2.7-2: Construction activities could release previously unidentified hazardous materials into the environment. ***Less than significant with mitigation.***

> **Mitigation Measure 2.7-2:** PacifiCorp's *Hazardous Substance Control and Emergency Response Plan* shall include provisions that would be implemented if any subsurface hazardous materials are encountered during construction. Provisions outlined in the plan shall include immediately stopping work in the contaminated area and contacting appropriate resource agencies, including the CPUC designated monitor, upon discovery of subsurface hazardous materials. The plan shall include the phone numbers of local, regional, and State agencies and primary, secondary, and final cleanup procedures. The *Hazardous Substance Control and Emergency Response Plan* shall be submitted to the CPUC for review and approval prior to the commencement of construction activities.

Significance after Mitigation: Less than significant.

Removal and Disposal of Hazards Materials

Treated wood poles associated with the existing tap poles and substation support poles to be removed under the Proposed Project would be characterized for contamination potential and disposed of at an appropriate solid waste facility in accordance with State and federal solid and hazardous waste regulations. Therefore, impacts related to the removal and disposal of treated wood would be less than significant.

Equipment and material that would be removed from the Simonson Substation would be removed using standard utility practices, while adhering to all federal, State, and local laws in regards to hazardous materials containment, control, and transport. The equipment and materials would be hauled to PacifiCorp's Service Center in Medford, Oregon for storage. Impacts related to the removal, disposal, and/or recycling of existing substation and other transmission equipment would be less than significant.

Operations

During operations of the Proposed Project, a potential would exist that the transformer could fail, resulting in a spill of mineral oil at the Morrison Creek Substation. However, the substation would meet federal Spill Prevention, Control, and Countermeasures (SPCC) requirements, as outlined in Title 40 of the Code of Federal Regulations, Part 112. The proposed substation would be installed with an oil containment system that would consist of an approximately 50-foot by 40-foot concrete slab. The oil containment system would be constructed at grade and would surround the transformer and the regulators. All spilled oil would be properly characterized and collected and transported to an approved disposal site in accordance with applicable requirements. Pursuant to USEPA requirements, PacifiCorp would inspect the equipment and any required spill containment facilities on a monthly basis. Implementation of the SPCC requirements

described above would ensure that potential impacts related to a transformer malfunction oil spill would be less than significant.

c) Result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school: *No Impact.*

No existing or proposed schools have been identified within one-quarter mile of the proposed Morrison Creek Substation or existing Simonson Substation sites. In addition, construction and operation of the Proposed Project would not be expected to result in releases of hazardous emissions, substances, or waste. Implementation of the Proposed Project would result in no impacts to nearby schools.

d) Located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment: *Less than significant.*

The Proposed Project would not be located on a site with known hazardous materials contamination. If contaminated materials are encountered during project construction activities, implementation of Mitigation Measure 2.7-2 would reduce potential impacts associated with release of previously unknown hazardous materials to less than significant levels.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in safety hazards for people residing or working in the project area: *No Impact.*

The Proposed Project study area is not located within an airport land use plan, nor is there a general aviation airport located within two miles of the Proposed Project study area; therefore, the Proposed Project would not result in aviation safety hazards to people residing or working within the study area and no impacts would occur.

f) For a project within the vicinity of a private airstrip, safety hazard for people residing or working in the project area: *No impact.*

There are no known private airstrips located within two miles of the Proposed Project study area. Accordingly, there would be no private airstrip safety hazards associated with implementation of the Proposed Project.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan: *No Impact.*

No roadways that could be used by people evacuating the area during an emergency would be closed or otherwise blocked at any time by proposed construction activities or

operations of the Proposed Project. Therefore, the Proposed Project would not physically interfere with emergency response or evacuations and no impacts would occur.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires: *Less than significant with mitigation.*

The Proposed Project would be constructed in an area that is very susceptible to wildland fires. Heat or sparks from construction vehicles or equipment have the potential to ignite dry vegetation and cause a fire. Because proposed construction activities would be conducted in the summer months, there would likely be a high fire hazard. However, implementation of Mitigation Measure 2.7-3 would reduce the potentially significant wildland fire impact associated with the construction of the Proposed Project to less than significant.

Impact 2.7-3: Proposed Project construction activities could ignite dry vegetation and start a fire. This would be a less than significant impact with implementation of Mitigation Measure 2.7-3.

> **Mitigation Measure 2.7-3:** Water storage containers or water trucks shall be sited/constantly on-site in the Proposed Project area and be available for fire protection. All construction vehicles and work areas shall have fire suppression equipment and construction personnel shall be required to park vehicles away from dry vegetation. PacifiCorp shall contact and coordinate with the Smith River Fire Protection District (SRFPD) and the California Department of Forestry and Fire Protection (Cal-Fire) to determine the minimum amounts of fire equipment to be located at the construction site and appropriate locations for the water tanks. PacifiCorp shall submit verification of its consultation with SRFPD and Cal-Fire to the CPUC.

Significance after Mitigation: Less than significant.

Operations

During operations, the Proposed Project could increase the risk of wildland fires in the area because induced current at the new substation site could result in sparks that could reach trees and/or vegetation and result in fire. To minimize the risk of accidental ignition of a wildland fire from the proposed substation, PacifiCorp would follow State vegetation and tree clearing requirements, including CPUC General Order 95, Public Resources Code Section 4293. Therefore, operations of the Proposed Project would not result in a significant risk of loss, injury, or death involving wildland fires and operational impacts would be less than significant.

References – Hazards and Hazardous Materials

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