Construction Spill Prevention and Recovery Plan

Hobart Mills Substation

1 Introduction

Properly managing hazardous and toxic substances and petroleum products in the project site will greatly reduce the potential for stormwater pollution as well as greatly reduce the possibility of accidental release. Good housekeeping, common sense approaches, and the proper use and storage of these substances form the foundation of proper management of potentially environmentally hazardous materials.

2 Construction Site Location

The substation site is located in the area of Hobart Mills near the Town of Truckee, in Nevada County California. More specifically the site is 5.5 miles northeast pf Truckee and east of Highway 89, located on private property near the intersection of Dog Valley Road (Nevada County Road 889)and Old Reno Road (Nevada County Road 886E).

3 Construction Site Geology and Hydrogeology

The vicinity of the substation site is identified as located within geologic substructure zone III-Mesozoic Jura-Tiras Metavolcanic and Mesozoic Granitic Formations. The soil consists of the Aldi-Kyburz complex (ARE), which is a mix of the Aldi (55%) and Kyburz (30%) soil series.

Aldi soils have a zero to eight-inch surface layer of brown loam, with a weak structure and are slightly acidic. Subsoils consist of eight to 18 inches of brown clay loam with a moderate angular blocky structure and neutral pH. The substratum consists of 18 inches of weathered andesite.

Kyburz soils have a zero to six-inch surface layer of brown gravelly sandy loam of moderate granular structure and a slightly acidic pH. The subsoil consists of six to 34 inches of reddish brown gravelly clay loam of moderate subangular blocky structure with a very strong acidic pH. The substratum is located at 34 inches and consists of weathered andesite rock.

The site is classified as low risk for landslide.

During an above-average moisture year, groundwater was detected on site at 5 feet below surface level. There are no waters of the U.S. or State within the immediate site vicinity; it is outside of the 500-year flood zone and the State Flood Hazard Area.

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4 Potential Construction Site Stormwater Pollutants

The construction of the new Hobart Mills Substation will involve, grading of a larger area for the placement of the new substation, poring foundations for new transformers and electrical equipment, installation of new oil-filled electrical equipment and finally removal of the current oil-filled substation equipment. The following table presents a list of potential stormwater pollutants that may be present at various times during the construction.

Table 1

Trade Name Material	Chemical/Physical Description	Stormwater Pollutants
Concrete	White to gray slurry to solid	Limestone, sand, alkalinity
Curing compounds	Creamy white liquid	Naphtha
Wastewater from construction equipment washing	Water	Soil, oil & grease, solids
Water from dewatering operations	Water	Soil, solids
Hydraulic oil/fluids	Brown to black oily hydrocarbons	Mineral oils
Gasoline	Colorless to light yellow petroleum hydrocarbon – Flammable	Gasoline, Benzene, Ethylbenzene, Toluene, Xylene, potentially MTBE
Diesel	Red dyed and/or yellow hydrocarbon liquid	Petroleum distillate, oil & grease, naphthalene, Xylene
Antifreeze/Coolant	Fluorescent green/yellow liquid	Ethylene glycol, propylene glycol, potentially heavy metals
Erosion	Solid Particles	Soil, Sediment
PCB-Contaminated Dielectric Fluid	Yellow colored mineral oil	Highly refined petroleum distillates with polychlorinated biphenyls between 50 to 140 ppm
Non PCB Contaminated Dielectric Fluid	Yellow colored mineral oil	Highly refined petroleum distillates with less than 50 ppm polychlorinated biphenyls.

5 Spill and Pollution Prevention

The following techniques will be incorporated throughout the construction of the new Hobart Mills Substation to prevent and minimize the effects of potential releases:

5.1 Hazardous and Petroleum based Materials

- ✓ Storage of hazardous materials, chemicals, fuels, and oils and fueling of construction equipment will not take place within 200 feet of any drainage, wetland, spring, creek (ephemeral or active), or other water feature.
- ✓ Materials stored on-site will be stored in their appropriate, if not original containers on a previously prepared level location. All containers will be properly labeled as to its contents. If possible, drums will be stored on spill pallets to provide secondary containment. This location will be noted on the SWPPP map of the construction site.
- ✓ Whenever possible, the entire product will be consumed before its container is disposed of. Unconsumed product will be disposed of promptly and in accordance with state and federal laws.
- ✓ Material Safety Data Sheets (MSDS) will be available for all chemical materials used on site and will be located at the Construction Office, the Construction Foreman's vehicle.

5.2 Vehicles

- ✓ On site vehicles will be monitored for fluid leaks and will receive regular maintenance to reduce the chance of leakage. All leaks will be cleaned up in accordance with county, state, and federal law.
- ✓ Vehicles refueling will only occur on flat level ground where there is little chance of a spilled substance reaching a stream or waterway.

5.3 Bulk Storage Tanks

- ✓ Bulk storage tanks having a capacity of more than 55 gallons will have secondary containment. Containment can be provided a prefabricated temporary containment mat, a temporary earthen berm, or other measure designed to contain 110% of the largest tanks capacity. Bulk storage tanks and secondary containments should be inspected one a weekly basis.
- ✓ Lined bulk storage tank secondary containment should be inspected after a precipitation event. If no sheen is detected, then the water will be disposed of in the same manner as water collected during dewatering operations. Collected stormwater with sheens present will be disposed of in accordance with state and federal laws.
- ✓ Bulk fuel and lubricating dispensers will have a hand operated dispensing valve to allow the fuel to flow. During fueling and tank refueling operations, the contractor will have personnel present to detect and contain spills.

5.4 Trenching and Dewatering Operations

- ✓ Water collected during dewatering activities will be placed in a Baker Tank or other suitable retention structure to allow for sediment precipitation prior to discharge unless the water is collected for dust control purposes.

5.5 Spill Prevention and Clean Up Equipment

The following list of items will be on hand for use in the event of a spill, leak, or other release.

- ✓ 2 Spill kits consisting of: 1 55-gallon drum, two bags of absorbent, 1 bag of absorbent pads, 1 400 sq. foot sheet of plastic sheeting, 2 short handled shovels, 1 tyvek suit and booties.

6 Spill Recovery and Notification Procedures

6.1 Introduction

The purpose of this plan is to promote an effective response to potential hazardous material releases, oil spills, fires, or explosions that could occur during the construction of this facility.

6.2 Authorities and Responsibilities

6.2.1 Initial Emergency Responder (person reporting emergency):

The responsibilities of an employee arriving at the scene of a spill, fire or other potential threat to the environment are as follows:

1. Ensure all on-site personnel are safe and site is secure. Administer first aid if necessary and contact emergency medical responders as needed.

2. Immediately report the emergency to System Control and Environmental Services.

3. Provide the following information:
   - Name of person reporting spill
   - Telephone number where you can be reached
   - Location of Spill
   - Time of spill
   - Type and source of release
   - Quantity of material released
   - Summary of response already completed
   - Impact to any waterways or soil

4. Remain at the scene to prevent other people or vehicles from entering the emergency area until relieved by the Environmental Responder. Barricade the area if possible.

5. Initiate action to stop the source of the spill if possible

6.2.2 Environmental Responder / Coordinator:

Sierra's Environmental Services Department has an emergency response team consisting of five individuals who are responsible for spill response on a 24-hour basis. Each week the on-call duty is rotated to ensure constant coverage of the pager.

In the event of an environmental emergency, the on-call Environmental Responder will coordinate all agency notifications, temporary remediation, waste disposal, and final site clean-up and remediation. These individuals are familiar with all aspects of Sierra's contingency plans, all operations and activities at the facility, the location of all records for the facility, and

the facility layout. These individuals have the authority to commit the necessary resources needed to carry out the contingency plan and the responsibility to respond to the emergency as described in the Response Procedures section.

It will also be the responsibility of these individuals to ensure that waste and debris produced during clean up activities are disposed of according to all applicable state and federal regulations. The procedures for disposal are described in the Clean-up and Disposal Procedures.

6.2.3 Responsible Manager:

The Responsible Manager will ensure all contingency plans are implemented in accordance with these guidelines.

6.3 Response, Clean-up and Disposal Procedures

6.3.1 Phase I - Initial Response / Secure Site

Upon the detection of an release, the on site personnel will assess the situation to determine if medical response is needed. If a medical emergency exists, the attending individual will administer first aid and call for an ambulance / paramedic as necessary.

The individual shall then assess the potential for fires, explosions, or additional spills and take the appropriate actions to isolate the affected areas. At this point, the source of the release shall be stopped as best as possible. This may involve closing a valve in the event of a pipe release or mobilizing an electric crew in the event of a transformer rupture.

Simultaneously, containment techniques will be used to minimize spill impact. This will consist of the application of absorbent to the surface of any oil that is released from its secondary containment, and berming and diking if necessary.

6.3.2 Phase II - Notification / Site Assessment / Follow-up Reporting

After the safety of all on-site personnel is assured and the source has been stopped or contained, the on-site personnel shall contact Sierra's Environmental Services Department on pager (775) 887-8712.

The Environmental Responder / Coordinator shall gather as much information upon notification as possible. This information will be used to assess the spills magnitude and severity, position, content, direction and speed of migration, and likelihood of hitting sensitive habitats as well as to initiate the necessary clean-up actions at the site. The personnel reporting the spill shall provide the following information:

- Name of person reporting spill
- Location, time and source of Spill
- Quantity of oil released

- Summary of response already completed
- Impact to any waterways or soil

The collection of this information may involve coordination other with maintenance and operations personnel who may also have seen the spill, or with office personnel who can assist in data collection.

Upon notification, the Environmental Responder shall verify with the on-site personnel to ensure the source of the discharge has been stopped as best as possible and that containment has been initiated.

Following initial phone contact, a site visit shall be made to confirm information and obtain a first hand site assessment. If the contaminant is unknown, a sample shall be obtained and taken to the laboratory for analysis on a rush (8 hour) basis. Typically the contaminant will be evident by the container.

Depending upon the type of contaminant (light or heavy oil, or diesel) and location of the spill (e.g. asphalt, soil, concrete pad, etc.) a determination will be made as to the approach of clean-up. In the rare event that soil is contaminated and groundwater is threatened, excavation will immediately be initiated. Following excavation, samples will be taken of the soil, and if necessary, groundwater. Analytical results will be evaluated to ensure proper clean-up levels have been achieved.

In the event of a small spill on a non-porous surface with little to no threat of migration in soil or groundwater, clean-up may consist of absorbent material placed on and around the spill.

Each spill is analyzed on a case-by-case basis to determine the most effective remediation.

Effects to wildlife and plant life will be minimal if the spill is contained on site. Most all potential spill areas exist in the vicinity of enclosed buildings or concrete pad containment with minimal potential of spills impacting surface water or soils inhabited or used by wildlife, fish, or plant life. In the event of soil contamination, Sierra's policy of immediate response minimizes potential impacts to wildlife and plants.

Once the spill has been assessed, the on-call individual will notify all applicable agencies. Any spill at this site of more than the established reportable quantities as established in Appendix A of 40 CFR 172.101 or 42 gallons of petroleum based liquids or three cubic yards of impacted soil will be reported to the Nevada County Department of Environmental Health. Other agencies will be notified as required or as requested by NCDEH.

A written report may be required by the governing agency, depending on the cause, location, quantity and impact of the release. In the event of a single release greater that 1,000 gallons into navigable waters, or two smaller spills which enter a waterway or drainage within a 12-months period, a written report must be submitted to the Environmental Protection Agency (EPA). The Environmental Responder on-call at the time of the release shall submit this report to the agency within 60 days of the spill.

6.3.3 Phase III - Clean-up and Disposal

Clean-up and disposal efforts will be undertaken to restore the impacted area to its pre-spill condition as best as possible.

- For oil releases to non-porous or lined secondary containment, the Environmental Responder shall coordinate with a licensed oil pumping, transport, and disposal facility to have the liquid removed and properly disposed.

  Once removed, the surface will be cleaned as best as possible using floor sweep to minimize any residual oil.

- For oil releases to soil, the Environmental Responder may mobilize Sierra's construction crew or contract labor, depending on availability to excavate the contaminated area. This soil will be stockpiled until analytical data is available for proper disposal coordination. The stockpiled soil shall be secured on plastic and also covered with plastic. Straw bails will be used to secure the plastic from wind and/or storm water.

  Once the analytical data is obtained, the soil will be properly transported and disposed as required by state and federal regulations.

  Verification samples of the excavated area will be taken to ensure a proper level of remediation has been obtained.

  This entire process will be directed by the regulating agency and is subject to change based on their individual site requirements.

- For spills in buildings or on paved areas, an application of absorbent will be spread over the contaminated area and swept with a stiff broom to remove residues which may remain. This debris will then be packaged and disposed within regulations.

- For spills in waterways, the Environmental Responder will coordinate clean-up with a contract firm who has the necessary equipment and training to respond to such a spill.

The Environmental Responder, in conjunction with the regulatory agency will be responsible for determining when a site clean-up is complete.

6.3.4 Phase IV - Documentation

All spills and clean-up procedures will be carefully documented so that sufficient information is available. Information will be recorded by the Environmental Responder on a Spill Report and Spill Clean-up Report form (Appendix A) and filed in the Environmental Services spill file section. Information in these reports will include:

- Location of incident
- Time and date
- Individual reporting spill

- Source of spill
- Type and quantity of fluid released
- Cause of release
- Resources impacted, and
- Clean-up procedures

Photo documentation may also be taken and included at the Environmental Responders discretion.

All other documentation including invoices, agency reports, and field notes will be filed in the same jacket for future reference. These files shall be retained at Sierra's Records Center.

7 Emergency Contact Numbers

The following local authorities and response teams will be called for assistance, if necessary, during an emergency:

Ambulance / Paramedics:	Truckee Fire Department **(530) 582-7850 *or* 911**
Fire Department:	Truckee Fire Department **(530) 582-7850 *or* 911**
Hospital:	Tahoe Forest Hospital **(530) 587-6011 *or* 911**
Police / Sheriff:	Nevada County Sheriff's Department **(530) 581-6330 *or* 911**
Environmental Services:	Emergency Response Team **Pager: (775) 887-8712 24 hour access**

Clean-up / Disposal Resources

The following firms are available to assist with response, clean-up, and disposal procedures:

Contract Spill Clean up and Response

Universal Environmental, Inc
455 Franklin Way
Sparks, Nevada 89431
(775) 351-2500

H2O Environmental
390 Freeport Blvd., Suite 12
Sparks, Nevada 89431
(775) 351-2237

SPPCo Spill Clean-up and Response

SPPCo Construction Crew (Construction Crews should be used in Nevada only)
1 Ohm Place
Reno, Nevada 89502
(775) 834-4580 (775) 848-4580 (Troy Rasmussen's Cell)

Hazardous Waste Haulers

Universal Environmental, Inc
455 Franklin Way
Sparks Nevada 89431
(775) 351-2500

Waste Oil Haulers / Disposal

Reno Drain Oil
11970 Interstate 80 East
Sparks, Nevada 89431
(775) 342-0351

Laboratories

Alpha Analytical, Inc.
255 East Glendale Avenue, Suite 21, Sparks, Nevada 89431 (775) 355-1044