

Safety Newsletter

September 2012

This Month's Topic: Contaminated Soils & Spills at PG&E Sites

Contaminated soils may be encountered at any location and must be handled in accordance with federal, state and local regulations. PG&E or its representatives and contractors must not remove, handle, store or dispose of contaminated soil or waste material encountered during any excavation project without proper training and certifications.

Where soil contamination is suspected or likely, the PG&E Environmental Operations Field Specialist (EFS) responsible for the site must receive a soil analysis or request to have the soil tested before any work begins. Affected soils that are contaminated shall not be removed from the site, or be released to a third party from the jobsite without concurrence from PG&E.

Prevention of spills resulting from work activities performed at PG&E facilities or related offsite locations are critical in providing quality service to the Company. Alisto personnel need to be fully prepared to minimize the possibility of causing a hazardous material spill, and in providing emergency response in the event of a spill whenever working in the field.

What defines a Contaminated Soil?

Contaminated Soils are soils that require special handling due to the confirmed presence of constituents such as oils, solvents, lead, manufactured gas plant residues, and sewage.

Potentially Contaminated Soils:

Potentially Contaminated Soils are soils that may require special handling due to the excavation location or due to an unusual color/odor. Please answer the questions to the right to determine if you could be encountering contaminated soil.

Field Procedures for Found Contamination during Construction:

For ANY excavation work, the employee-in-charge must take the following actions if soil contamination is suspected:

- Stop excavation and notify the PG&E facility lead, EFS, and Project Manager.
- Close the site (stop work and barricade the site)

Hazardous Material Incident Response:

First-on-scene actions can significantly impact the outcome of an unauthorized release:

- 1) Safety
 - Avoid Exposure
 - Material Safety Data Sheet (MSDS) Required
 - Provide Hazard Information
- 2) Isolate
 - Barricade & Evaluate Scene
 - Control Entry Points, Consider Wind Factors
- 3) Notify
 - Facility Lead, EFS, Project Manager and/ or Landowner (For off hours notification, PG&E has an Environmental Emergency Hotline: 800.874.4043)
- 4) Administration
 - Collect and Document Incident Information (time, location, amount, actions, evaluations; take pictures)

Incident Reporting Process:

- 1) Incident Occurs
 - i) Release Incident
 - (1) Contact Area EFS
- 2) Draft Incident Report Development
 - i) Technical Review Team (Review before sending to Environmental Agencies)
- 3) Final Draft Approval & Distribution
 - i) Approved by Area EFS



Questions that help in determining potential contamination:

- Is the excavated soil from a PG&E substation built before 1970?
- Is the soil from an industrial area that could have been associated with hazardous material?
- Is the soil located near a former PG&E manufactured gas plant site?
- Does the soil contain black powdery or tar-like substances?
- Does the soil have unusual colors or odors?
- Is any excavated soil located within a freeway right of way?

*Most Gas Transmissions site personnel are considered *first responders at the awareness level* under OSHA HAZWOPER REGULATIONS

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Spill Prevention:

- Review project hazardous materials inventory, which may be used in the field before beginning any work. Become familiar with hazardous materials, i.e., solvents, coatings compressed gases, etc. which will be brought and/or stored on site. Review the MSDS with the emphasis on the Accidental Release and Reporting Sections. Notify the facility supervisor or Project Manager prior to bringing any hazardous materials on site.
- When working at PG&E facilities. Preview the facility Hazardous Materials Business Plan (HMBP) and / or Spill Prevention Control and Countermeasure Plan (SPCC). Become familiar with the facility hazardous materials inventory, spill cleanup procedures and resources, and emergency contact information and procedures.
- Attend any facility orientation training prior to beginning work.

Written Follow-Up Reports:

PG&E requires that an oil/hazardous materials spill report form be completed for each environmental incident or emergency. The EFS will prepare and submit written reports to government agencies, using information provided by facility personnel.

Releases of Fluids from Vehicles and Equipment Construction Sites:

Releases of fluids (oil, hydraulic fluid, antifreeze, etc.) can potentially be released from vehicles and engine powered equipment located at project construction sites. Daily inspections should be conducted for leaks and/ or active releases, and documented via a log for each vehicle and piece of equipment located on site. Any leaks should be immediately reported to the PG&E project lead and /or the EFS. Steps should be taken to immediately mitigate the release including the application of absorbent material to the affected area and subsequent cleanup, installation of secondary containment to active leaks, and immediate repair or removal of the affected equipment which caused the release.

"PG&E is committed to being an environmental leader and demonstrating this through its actions. Proper management of contaminated soils, spill response and cleanup are important to the success of PG&E's environmental organization."

-Richard McCurdy
Senior Technical Consultant

Soil Release to Third Parties:

- Soil must have been evaluated and all appropriate parties notified
- Analyzed soil must justify a business reason for further evaluation
- Analytical results indicating that contamination requires soil disposal at a facility that is licensed & approved by PG&E to accept waste