

# NOTICE OF INTENT FORM

**NOTICE OF INTENT (NOI)**  
**WATER QUALITY ORDER NO. 2006-0008-DWQ**  
**STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)**  
**PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND STRUCTURES TO**  
**SURFACE WATERS OF THE UNITED STATES**  
**GENERAL PERMIT NO. CAG990002**

## I. NOTICE OF INTENT STATUS (See Instructions)

MARK ONLY ONE ITEM	1. <input type="checkbox"/> New Discharger	2. <input checked="" type="checkbox"/> Change of Information – WDID # 2000U000044
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## II. OWNER/OPERATOR (If additional owners/operators are involved, provide the information in a supplemental page.)

A. Name Pacific Gas and Electric		Owner/Operator Type (Check One) 1. <input type="checkbox"/> City    2. <input type="checkbox"/> County    3. <input type="checkbox"/> State 4. <input type="checkbox"/> Gov. Combo    5. <input checked="" type="checkbox"/> Private			
B. Mailing Address 77 Beale St. Mail Code B24A					
C. City San Francisco		D. County San Francisco		E. State CA	F. Zip Code 94105
G. Contact Person Sara Everitt		H. Title Principal Environmental Engineer			I. Phone (415) 973 - 0707

**ADDITIONAL OWNERS** \_\_\_\_\_

## III. BILLING ADDRESS (Enter information only if different from above)

Send to: <input checked="" type="checkbox"/> Owner/Operator <input type="checkbox"/> Other	A. Name		B. Title		
	C. Mailing Address				
D. City		E. County		F. State	G. Zip Code

## IV. RECEIVING WATER INFORMATION

A. Receiving water(s): See Attached Drawings	B. Describe the types of receiving waters affected: See Attached Drawings
C. Regional Water Quality Control Board(s) where discharge sites are located List all regions where discharge of wastewater is proposed, i.e. Region(s) 1, 2, 3, 4, 5, 6, 7, 8, and/or 9:    2	

## V. LAND DISPOSAL/RECLAMATION

The State Water Resources Control Board's water rights authority encourages the disposal of wastewater on land or re-use of wastewater where practical. You must evaluate and rule out this alternative prior to any discharge to surface water under this Order.

Is land disposal/reclamation feasible?     Yes     No

If Yes, you should contact the Regional Water Board. This Order does not apply if there is no discharge to surface waters. If No, explain:

## VI. VERIFICATION

Have you contacted the appropriate Regional Water Board or verified in the appropriate Basin Plan that the proposed discharge will not violate prohibitions or orders of that Regional Water Board? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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## VII. TYPE (Check All That Apply)

<input checked="" type="checkbox"/> Electric <input checked="" type="checkbox"/> Natural Gas <input type="checkbox"/> Telephone <input type="checkbox"/> Other:
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**VIII. POLLUTION PREVENTION PRACTICES PLAN INFORMATION**

A. Company Name Pacific Gas and Electric		B. Contact Person Sara Everitt		
C. Street Address Where PLAN is Located 77 Beale St., Mail Code B24A		D. Title of Contact Person Principal Environmental Engineer		
E. City San Francisco	F. County San Francisco	G. State CA	H. Zip Code 94105	I. Phone (415) 973 - 0707

**IX. DESCRIPTION OF DISCHARGE**

Describe the discharge(s) proposed. List any potential pollutants in the discharge. Attach additional sheets if needed.

The anticipated discharges are from underground utility structures such as vaults and include water from subterranean seepage and storm water inflow. Potential pollutant may include suspended solids, soils, oil, grease and total petroleum hydrocarbons. These become negligible with the implementation of the Pollution Prevention Plan.

**X. VICINITY MAP AND FEE**

A. Have you included vicinity map(s) with this submittal?  Yes  No  
 Separate vicinity maps must be submitted for each Region where a proposed discharge will occur.

B. Have you included payment of the filing fee (for first-time enrollees only) with this submittal?  Yes  No  N/A

C. Have you included your PLAN?  Yes  No

**XI. CERTIFICATION**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is true, accurate, and complete to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. In addition, I certify that the provisions of the permit, including the criteria for eligibility and the development and implementation of Pollution Prevention Practices, if required, will be complied with."

A. Printed Name: Robert L. Harris

B. Signature: 

C. Date: 11/20/06

D. Title: Vice President Environmental Health Safety and Technical Land Services

**PLEASE SUBMIT THE NOI, FIRST ANNUAL FEE, PLAN AND MAP TO THE FOLLOWING ADDRESS:**

**UTILITIES NOI  
 NPDES UNIT  
 DIVISION OF WATER QUALITY  
 STATE WATER RESOURCES CONTROL BOARD  
 P.O. BOX 100  
 SACRAMENTO, CA 95812-0100**

**STATE USE ONLY**

WDID:	Regional Board Office	Date NOI Received:	Date NOI Processed:
		Fee Amount Received: \$	Check #:

**POLLUTION PREVENTION PLAN For  
 General Utility Order No. 2006-008-DWQ  
 NPDES Permit No. CAG990002  
 San Francisco Bay Area Regional Water Board**

<b>Company Name:</b> Pacific Gas and Electric Company		<b>Date:</b> 11/10/06
<b>Street Address:</b> (where plan is located) 77 Beale Street, Mail Code B24A		
<b>City:</b> San Francisco	<b>State:</b> CA	<b>Zip code:</b> 94105

**Amendment Log**

<b>Date</b>	<b>Brief Description of Amendment</b>	<b>Page No. of Plan affected by change</b>	<b>Prepared By</b>

**Table of Contents**

	Page
General Permit Coverage .....	1
Plan Requirements .....	1
I. Provisions for Scheduled Discharges, Unscheduled Discharges, Reservoir Discharges (if any), and Emergency Operation Discharges. ....	1
II. Pollution Prevention Team.....	2
III. Description of Potential Pollutant Sources.....	2
IV. Measures and Controls .....	3
V. Comprehensive Site Compliance Evaluation.....	7
VI. Amendments to this Plan.....	8
 Attachment A – Drainage Map	
Attachment B – Site Materials Inventory of Exposed Materials List	
Attachment C – List of Significant Spills and Leaks	
Attachment D – The Water Discharge Record and Underground Substructure Vault Inspection Form	
Attachment E - Annual Certification and Checklist of Pollution Prevention Practices (PPPs)	

### **General Permit Coverage**

Utility companies supply resources including, but not limited to, suppliers of natural gas, electricity, and telephone services. Utility companies with short-term intermittent discharges from utility vaults and underground structures to waters of the United States that do not cause, have the reasonable potential to cause, or contribute to an in-stream excursion above any applicable State or federal water quality objectives/criteria or cause acute or chronic toxicity in the receiving water are authorized to discharge in accordance with the conditions set forth in this Order.

This Pollution Prevention Plan (Plan) is designed to prevent or control the discharge of pollutants. It may include a schedule of activities, prohibition of practices, maintenance procedures or other management practices. This Plan describes the activities taken to comply with the requirements in the General Permit. The Plan is intended to evaluate potential pollutant sources at the site and select and implement appropriate measures designed to prevent or control the discharge of pollutants.

### **Plan Requirements**

The Plan is designed to comply with Best Available Technology and or Best Control Technology (BAT/BCT) to ensure compliance with Water Quality Standards. It shall be amended whenever there is a change in construction, operation, or maintenance, when such amendment is necessary to ensure compliance with BAT/BCT and receiving water limits. It shall also be amended if it is in violation of any conditions of this General Permit or has not achieved the general objective of controlling pollutants in discharges to surface waters. The amended Plan shall be submitted to the appropriate Regional Water Quality Control Board. It and any amendments shall be certified in accordance with the signatory requirements.

#### **I. Provisions for Scheduled Discharges, Unscheduled Discharges, Reservoir Discharges (if any), and Emergency Operation Discharges.**

The provisions incorporated in this plan address scheduled, unscheduled and emergency operation discharges. Reservoir discharges do not apply.

**II. Pollution Prevention Team**

The following persons have developed this Plan and are responsible to assist the facility and/or plant manager with its implementation maintenance, and revision.

Team Member Title: Transmission Substation Maintenance and Construction Supervisor	Contact Number: 415 330 2286
Team Member Name (Optional):	
Responsibilities for the implementation and assistance to operations for the following <ul style="list-style-type: none"> <li>• good housekeeping and preventive maintenance;</li> <li>• Inspections, record keeping and internal reporting procedures,</li> <li>• Spill prevention and response procedures, sediment and erosion control, and management of runoff;</li> </ul>	
Team Member Title: Senior Program Manager, Asset Management	Contact Number: 925 768 2907
Team Member Name (Optional):	
Responsibilities for the implementation and assistance to operations for the following: <ul style="list-style-type: none"> <li>• good housekeeping and preventive maintenance;</li> <li>• Inspections, record keeping and internal reporting procedures;</li> <li>• Spill prevention and response procedures, sediment and erosion control, and management of runoff;</li> </ul>	
Team Member Title: Environmental Field Specialist Supervisor	Contact Number: 510-437-2581
Team Member Name (Optional):	
Responsibilities: Release reporting and Training	
Team Member Title: Engineer	Contact Number: 925 866 5421
Team Member Name (Optional):	
Responsibilities: Sampling data results and records	

**III. Description of Potential Pollutant Sources**

This Plan provides a description of potential sources that may add significant amounts of pollutants to discharges. This Plan identifies all activities and significant materials that may potentially be significant pollutant sources. Included in this Plan are the following:

- a) Drainage map: See **Attachment A** for map showing the distribution system for the service area within San Francisco Bay Area Regional Water Board boundary and corresponding surface waters to which water may be discharged.
- b) Inventory of Exposed Materials: See **Attachment B** for site materials inventory that potentially may be exposed to precipitation.

Any hazardous materials managed with in the vaults are contained in equipment or enter from the out side environment through perforations in vault. Existing control measures

and management practices are in place to ensure only appropriate discharges occur. They include inspection of potential discharges for unusual odors or appearance by qualified employees before any discharge is allowed. All discharges are attended and managed by qualified employees to ensure that no excess erosion or pollutants occur resulting for the discharge activity. Any materials not allowed to be discharged are retained and are managed appropriately.

Some vaults have automatic pumps that pump ground water seepage and or infiltrated storm water out of the vault. These pumps are engineered and installed to ensure that only appropriate water is discharged from the vault.

No discharged vault water is treated, any vault water not fit to be discharged is managed appropriately depending on the location and the contaminant.

c) Spills and Leaks: See **Attachment C** for list of significant spills and leaks that occurred three years prior to the submission of this NOI.

d) Risk Identification and Summary of Potential Pollutant Sources:

Electrical equipment contained within vaults may contain mineral or insulating oils. Since the vaults may be in populated areas there is the potential of a contaminant migrating from the outside environment.

The table below lists the any significant potential source of pollutant and the pollutant parameter.

Vault Location or Type	Significant Potential Source	Pollutant Parameter	Pollutant Parameter	Pollutant Parameter
Utility Vault	Oil filled Electrical Equipment	Mineral or insulating Oil		

#### **IV. Measures and Controls**

This Plan includes Pollution Prevention Practices (PPP) developed appropriately for the dewatering of vaults and such controls are implemented. The appropriateness and priorities of PPPs reflect identified potential sources of pollutants at the vaults. Also, the advantages and limitations of the PPP are discussed. The description of wastewater management controls shall address the following components, including a schedule for implementing such controls:

a) Good Housekeeping

Discharge areas are cleaned and flows are directed to minimize contamination of discharge from the vault. The discharge is protected from any hazardous materials.

b) Preventive Maintenance

PG&E has standard operating practices that address inspections, equipment testing, preventive maintenance and maintenance. The standard requires that inspection, equipment testing, and preventive maintenance are performed on a specified schedule. Any discrepancies discovered are resolved. Maintaining the integrity of the equipment and system are a priority.

c) Spill Prevention and Response Procedures

Electrical equipment contained within vaults may contain mineral or insulating oils.

However prior to any discharge the vault is inspected to determine the integrity of the equipment. Additionally before any water is discharged, it is checked for odors, sheens, oils and cloudiness. If any of these items are present, they must be addressed before the water may be discharged. If any of these items cannot be addressed, the water may not be discharge to storm water drain and the water must be managed differently.

If there is an unexpected release, agencies are notified if appropriate and the release is addressed either through a contractor or directly by a PG&E Crew. Spill response equipment is available on crew trucks and additional supplies are at PG&E facilities.

All used clean-up materials are managed appropriately after it is determined if the materials are hazardous.

d) Inspections

1) Vault General Inspection

The vault will be inspected to ensure that no hazardous materials are present and the integrity of any equipment is intact. The Water Discharge Record and Vault Inspection Form is included in Attachment D. If any deviations in the vault, equipment or discharge it will be noted on the inspection form and corrective action will be performed. If there are any deviation copies of the inspection sheet will be provided to the Environmental Field Services personnel. They will determine if the Pollution Prevention Plan requires revision and contact appropriate personnel to execute the changes and submittal.

2) Vault Water Inspection:

All vault water will be inspected prior to discharge. Inspection will consist of taking a sample of the water and looking for cloudiness, discoloration or odors or an oil sheen. Samples will be taken by dipping a clear plastic disposable bailer (PG&E M&S CODE M49-0076) below the surface of the water and bringing up at least one cup (8 oz.) of the vault water. The water will be decanted to a sample container. Sample containers must be clean before use. Examples of appropriate



container are quart mason jars or canning jars that are new or have been washed with soap and rinsed twice with drinking water.

3) Vault Water Evaluation:

Once the sample has been taken, it will be observed after sitting for a few minutes to stabilize. Examples of things to look for are sewage odors, turbidity, suspended sediment or solids, visible floating materials, gasoline odors, solvent odors, oiliness or soapiness. If the sample does not exhibit any of these characteristics, you can continue with the next inspection as described in the next paragraph. If it does, the water must be sampled and characterized by a state certified analytical laboratory prior to being discharged, this should be coordinated with your local environmental professionals. If work must proceed immediately (such as during emergency operation) you should containerize the water in 55 gallon drums or other appropriate containers and then have it characterized. The holding drums or containers must be identified with a "Lab Test Pending" label. These drums or containers should be transported to the nearest PG&E service centers in accordance with applicable DOT requirements, and notify your local environmental professionals.

If the sample has passed the first inspection then you should also look for evidence of an oil sheen, oily water mixture, asphalt tar, or evidence of soil contamination in the vault itself. If these contaminants are present and you can pump the majority of the water from the vault without disturbing the contaminants, you may do so; otherwise, the pumping must be stopped immediately. The remainder of the material must be containerized for eventual characterization or solidified and removed from the vault. You can solidify small amounts of the remaining material by absorbing it with rags or kitty litter etc. and removing all traces from the vault. Care must be taken when doing this type of pumping to ensure that none of the mud, asphalt particles or oil sheen is pumped to the street or storm drains. Please make sure that any absorbent materials used to soak or dry the vault floors must be clean to avoid unanticipated contamination.

Samples of vault water used to substantiate the condition of the discharged water should be retained by the crew for the entire time the job takes. This water then may also be disposed of based on the results of testing. If the sample leads you to containerize the water, this sampled water should also be poured into the container.

4) Discharge Documentation:

Any water discharge under this procedure must be documented. The operator must complete the Water Discharge Record and Underground Substructure Vault Inspection Form as shown in Attachment D

These records must be retained for a minimum of five years at each of the operating headquarters. The records should be available for inspectors from the Regional Water Quality Control Boards or Municipal Waste Water Inspectors to view upon request.

e) Employee Training

PG&E's environmental training includes housekeeping, erosion prevention, and hazardous materials management. This training is provided under the environmental compliance program. It is provided annually to appropriate personnel.

Training specific to this plan pertaining to visual monitoring and vault water discharge is provided by the local Environmental professional. The Division OM&C director will assure that appropriate Electric and Gas personnel are trained in the use of this procedure. Records of such training will be maintained at individual service centers.

f) Record Keeping and Internal Reporting Procedures:

Record keeping and reporting requirements include the following.

- The Pollution Prevention Plan is available on PG&E intranet on the Environmental Services web page for Discharge of Water from Vaults and Underground Structures.  
[http://env/Compliance/Reference/Water/discharge\\_vaults.htm](http://env/Compliance/Reference/Water/discharge_vaults.htm)
- Whenever there is a discharge of 50,000 gallons or more to a municipal separate storm sewer system the discharger shall contact the appropriate local agency within 24 hours. Contact the Environmental Field Services personnel to assist.
- The discharger shall report any noncompliance that may endanger health or the environment to the appropriate Regional Board. This information must be provided orally within 24 hours. A written submission shall also be provided within 5 days of the time the discharger has become aware of the incident. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. Contact the Environmental Field Services personnel to assist.
- The required sample results shall be reported in the annual report. If a Discharger monitors the above constituents more frequently than required by this General Permit, then the results of such monitoring shall be included in

the calculation and reporting of the data submitted in the annual report. Separate annual reports are required for each region.

- Reporting any oil spill into a water body to the National Response Center at (800) 424-8802 (24 hours). Contact the Environmental Field Services personnel to assist.
- Reporting spills to the appropriate local agency, such as the fire department, to assist in cleanup and notify appropriate Plan team member. Contact the Environmental Field Services personnel to assist. After the incident, provide a description of the incident, along with other information describing the quality and quantity of discharges. Time of occurrence, mode of dumping, responsible parties, date and time of incident, weather conditions, duration and cause of spill/leak/discharge, response procedures, resulting environmental problems and persons notified should be included in an incident report to the Plan member in charge of record keeping.

g) Sediment and Erosion Control:

PG&E will employ appropriate soil erosion prevention mechanisms during discharge of water from underground vaults. These mechanisms include such use of overflow pipes to channel water to the street storm drain, or splash blocks to prevent soil erosion.

h) Management of Runoff:

PG&E employs maintenance practices and inspections to minimize the source of pollutants. Discharges from vaults are managed to minimize erosion and encounter contaminants after discharge from the vaults.

## **V. Comprehensive Site Compliance Evaluation**

Qualified personnel shall conduct site compliance evaluations during discharge events. Such evaluations shall provide the following.

The operations of the utility are strictly regulated. The operations of the vaults and the equipment are included and are required to be under a comprehensive inspection and maintenance program. This ensures the integrity of the equipment and system.

Additionally, the inspections performed during discharges will determine the effectiveness of the PPPs. Any ineffective practices will be evaluated and will be revised appropriately. This Plan will be revised, recertified, and submitted to the appropriate Regional Water Quality Control Board.

Annually this plan will be reviewed to determine its effectiveness and compliance with the General permit. A report summarizing the scope of the evaluation, personnel making the evaluation, the date(s) of the evaluation, major observations relating to the implementation of the Plan, and actions taken will be developed and retained for 3 years. It will identify any incidents of noncompliance and it will certify that the facility complies with the Plan and this General

Permit. The report shall be signed in accordance with signatory requirements of this General Permit. The goal is to have the annual certification completed by May 1 of each year. The Annual Certification and Checklist of Pollution Prevention Practices is included in Attachment E.

**VI. Amendments to this Plan**

This Plan shall be amended whenever there is a change in the General Permit, or annually if any conditions discovered in the annual certification of the pollution prevention practices checklist deems it necessary to revise the Plan. The following items will be included in the amendment:

- Proposed change
- Reason for change
- Original BMP, if any
- New BMP proposed
- Page number of Plan affected by change

The amendments for this Plan can be found on the front cover of the Plan.

**Attachment A – Drainage Map**

(Map to include distribution system for the service area within Regional Water Board boundary and corresponding surface waters to which water may be discharged)

**Attachment B – Site Materials Inventory of Exposed Materials List**

This inventory includes types of materials handled at the site that potentially may be exposed to precipitation. Specifically, the inventory should cover:

The Utility vaults that PG&E manages contain only electrical equipment and therefore only contains mineral or insulating oils. In some cases, the mineral or insulating oils may contain PCB's. However, because PG&E has a program to reduce the number of electrical equipment that contains oils with PCB's the number of this type of equipment is only a small percentage of all PG&E's equipment.

In some cases contaminants may enter the vault form the outside environment. These contaminants are predominately caused by a person illegally or irresponsibly managing hazardous materials and these include oil, greases and corrosives.

Any waste generated is transported to a PG&E facility where the determination of classification of the waste is made. If it is determined hazardous, it is managed as hazardous waste and disposed at an authorized facility. If it is not hazardous, it is discarded to the appropriate facility.

Equipment containing hazardous materials are routinely inspected and maintained in accordance with other regulatory agencies. Much of this equipment is monitored remotely so any failures would alarm operations and a crew would respond to investigate and address any problems.

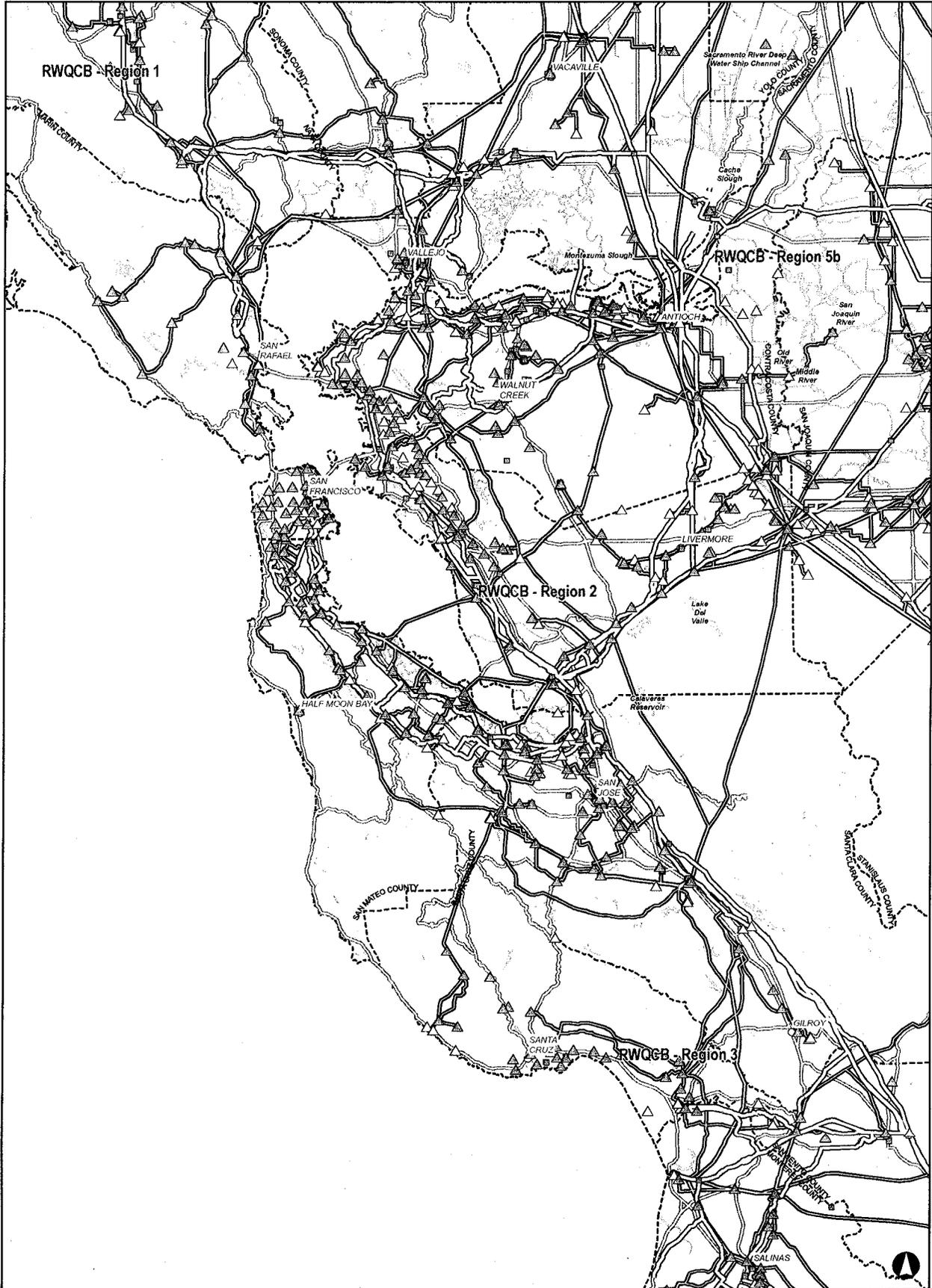
Generally, vault water is not treated. However, in some cases if sediment is the only contaminant it is allowed to settle and if appropriate, it is discharged.

# California Regional Water Quality Control Board San Francisco Bay Region 2 (Map 1 of 2)

PG&E Maps for NPDES Permit #CAG990002



- |                            |                   |                                |   |                |   |
|----------------------------|-------------------|--------------------------------|---|----------------|---|
| Electric Transmission Line | ----- County Line | PG&E Transmission Facility     | △ | Water Body     | ○ |
| Gas Transmission Line      | ===== Highway     | Customer Transmission Facility | △ | RWQCB Boundary | □ |
|                            |                   | Other Facility                 | □ |                |   |

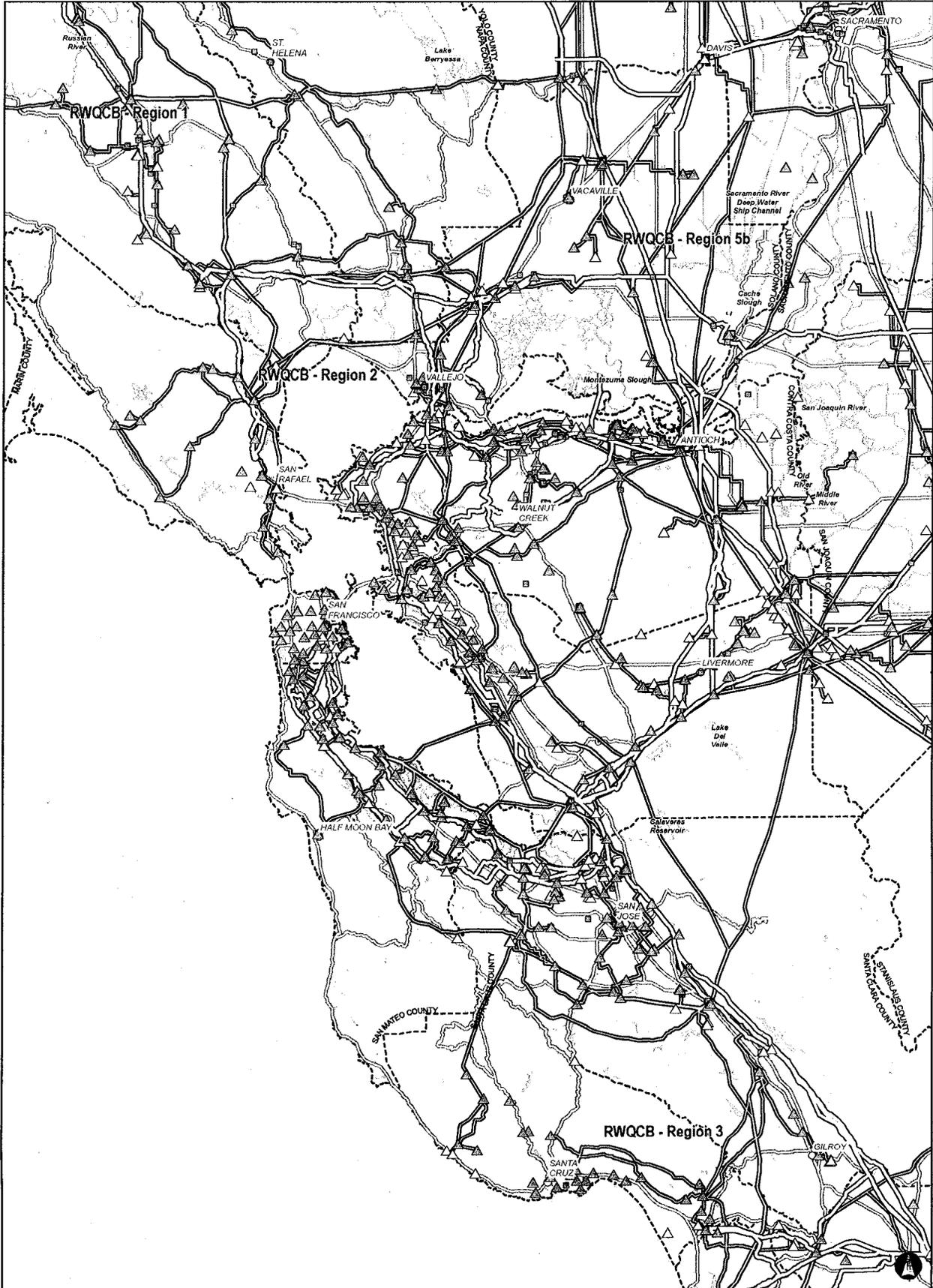


# California Regional Water Quality Control Board San Francisco Bay Region 2 (Map 2 of 2 - detail)

PG&E Maps for NPDES Permit #CAG990002



- |                            |                   |                                |   |                |
|----------------------------|-------------------|--------------------------------|---|----------------|
| Electric Transmission Line | ----- County Line | PG&E Transmission Facility     | △ | Water Body     |
| Gas Transmission Line      | ==== Highway      | Customer Transmission Facility | △ | RWQCB Boundary |
|                            |                   | Other Facility                 | □ |                |



**Attachment C – List of Significant Spills and Leaks:**

Included is a list of significant spills and significant leaks of toxic or hazardous pollutants that occurred at areas exposed to precipitation or that otherwise enter the discharge stream from 3 years prior to the date of the submission of this NOI. The list shall be updated as appropriate during the term of this General Permit.

**Significant Spill and Leaks of Hazardous Pollutants Associated with Utility Vaults**

Unit Name	Event Instance Begin Date	County	Service Area	Description of Incident:	Substance Released
Belmont Service Center	08/28/2004	San Mateo	Area 1	A subsurface transformer ruptured and sprayed a small quantity of oil to the enclosure and shrubs adjacent to the unit. PG&E crews cleaned the visibly affected shrubs, the enclosure, and changed the transformer.	Insulating Oil with less than 5 ppm PCBs
San Francisco Service Center	08/19/2005	San Francisco	Area 1	Underground transformer failed and spilled about 20 gallons of mineral, non-PCB oil inside the vault. An explosion and fire ensued above the vault enclosure at street level. There was one injured pedestrian as result of the explosion and ensuing fire. The San Francisco Fire Department, San Francisco Police Department, California Public Utilities Commission and Region IX Environmental Protection Agency all responded to the incident. The spill was contained within the vault and the spill zone was visible and clear. The clean up was completed.	Insulating Oil with less than 5 ppm PCBs
San Francisco Service Center	12/17/2004	San Francisco	Area 1	A subsurface transformer failed, exploded and oil spill caught fire. The San Francisco Fire Department responded to the scene to put out the fire. An oil sample was taken by the PG&E crew responding to the incident, as there was no visible sign of a label with PCB information; Post-sampling was not required. Third party property, including two parked vehicles and driveway were contaminated with spilled oil. NRC Environmental was contacted to conduct cleanup on Thursday, December 16, 2004. The area was cleaned per UO Standard S-2320. The used transformer oil and all cleanup materials (i.e., absorbent material and PPE) used were brought to the San Francisco Service Center for future disposal. Electrical Underground crews are on the scene, installing new transformer.	Insulating Oil with less than 50 ppm PCBs



Significant Spill and Leaks of Hazardous Pollutants Associated with Utility Vaults

San Francisco Service Center	10/23/2004	San Francisco	Area 1	A subsurface transformer failed, exploded, and oil spill caught fire. 3rd party property, including front entry, garage, and area around front entry was burned. Oil was on roof of garage, steps, sidewalk. Also affected was a car and vegetation. The area was clean.	Insulating Oil with less than 5 ppm PCBs
San Francisco Service Center	05/10/2006	San Francisco	Area 1	Underground switch failed and spilled about 5 gallons of 278 ppm PCB mineral oil mainly inside the manhole with about a gallon on the outer rim of the manhole cover lid, and the concrete and pavement of the street above. T. his was reported to Richard Lee at the San Francisco Public Health Department. Clean up was completed with confirmation samples taken to ensure the clean up was complete.	Insulating Oil with less than 500 ppm PCBs
Fremont Service Center	09/21/2005	Alameda	Area 2	A Trayer switch exploded and released 40 gallons of Non-PCB analyzed oil into the vault and onto the adjacent lawn. The affected lawn was excavated to a depth of 3 inches. Clean-up was performed by NRC Environmental Services. Clean-up is complete. There were no injuries. Oil did NOT reach any waterways. PM# 30463684	Insulating Oil with less than 5 ppm PCBs
Antioch Service Center	12/29/2005	Contra Costa	Area 2	An underground switch failed inside the vault. A small amount of the non PCB mineral oil sprayed into the sidewalk and gutter. A area was cleaned up.	Insulating Oil with less than 5 ppm PCBs
Concord Service Center	01/10/2006	Contra Costa	Area 2	An underground switch failed and released its oil outside the vault. San Ramon FD was the first responder on site and extinguished the small fire in the vault, diked the storm drain down stream. The mineral oil was non-PCB but contaminated the surrounding vegetation (trees, grass, and plants) and road. A County Environmental Health inspector checked the site and determined none of the oil reached the storm drain. A complete clean up was performed.	Insulating Oil with less than 5 ppm PCBs
Hayward Service Center	05/04/2005	Alameda	Area 2	A sub surface transformer failed within a vault and released most of it's 12.6 ppm PCB analyzed oil within the vault enclosure. A small amount of oil and water sprayed up through the vault opening. Two cars also got a small amount of spray on them that were parked next to the vault. The cars were washed immediately. The area was completely cleaned.	Insulating Oil with less than 50 ppm PCBs

**Significant Spill and Leaks of Hazardous Pollutants Associated with Utility Vaults**

Santa Cruz Service Center	10/28/2004	Santa Cruz	Area 3	A crew was called out to repair a bad underground primary cable and found that a subsurface transformer failed and leaked its contents (approximately 13 gallons of Non-Detect/Non PCB emergency-analyzed insulating fluid) to soil and excavation rock. Clean-up was complete.	Insulating Oil with less than 5 ppm PCBs
Salinas Service Center	05/01/2006	Monterey	Area 3	Equipment failure to subsurface transformer released approximately 5 gallons of Non PCB insulating fluid to the contained underground structure, a juniper bush, concrete driveway and walk, brick planter, and soil. No injuries or evacuations occurred. No agencies visited the site. No oil entered any navigable waterways. Clean up was complete.	Insulating Oil with less than 5 ppm PCBs
Salinas Service Center	12/30/2003	Monterey	Area 3	During a heavy rain and wind storm a subsurface transformer failed and released approximately 10 gallons of Non-Detect/Non PCB insulating fluid into the vault and on lawn and dirt around the structure. Clean up completed.	Insulating Oil with less than 5 ppm PCBs
Cinnabar Service Center	10/10/2005	Santa Clara	Area 3	A subsurface transformer failed, resulting in fire. San Jose fire department responded and extinguished fire using foam and water. Crews completed the clean up.	Insulating Oil with less than 5 ppm PCBs
Fresno Service Center	06/22/2006	Fresno	Area 4	A subsurface transformer failed, caught fire and blew oil along the west side of the street, lawn, and side walk. Analytical test results indicate a presence of PCB at 63ppm. Clean up was completed with confirmation samples taken to ensure the clean up was complete.	Insulating Oil with less than 500 ppm PCBs
Manteca Service Center	08/30/2005	San Joaquin	Area 5	A vault mounted transformer over heated and released non-PCB mineral oil. Vault lid was ejected into the air. Oil spatter released out of vault and onto concrete driveway between two residences. Fire was also involved, but was contained to vault. The area was cleaned up.	Insulating Oil with less than 5 ppm PCBs

Significant Spill and Leaks of Hazardous Pollutants Associated with Utility Vaults

Stockton Service Center	04/22/2005	San Joaquin	Area 5	<p>Below grade junction box over pressurized, blew off vault cover, and released oil to grass lawn and adjacent tree. Approximately 1 gallon of oil was released. Lab data received later in the day indicated the oil contained 24 ppm PCB. Clean crew performed clean-up by removing all visible signs of contamination from lawn and tree.</p>	Insulating Oil with less than 50 ppm PCBs
Stockton Service Center	07/23/2006	San Joaquin	Area 5	<p>Below grade, vault mounted switch overheated and exploded. Switch launched out of vault onto residential front lawn. Mineral oil from the switch impacted two residences: Mineral oil also splattered onto street and sidewalk, but did not enter storm drain adjacent to switch. A fire also in ignited a portion of the lawn but was extinguished by the Stockton Fire Department. No humans, animals, or waterways were known to be impacted. Lab results indicated the oil from the switch was 86 ppm PCB. Clean up was completed with confirmation samples taken to ensure the clean up was complete.</p>	Insulating Oil with less than 500 ppm PCBs
Tracy Service Center	05/22/2006	San Joaquin	Area 5	<p>A crew was pumping water from below grade transformer vault. Water was being discharged into street gutter when crew observed sheen on the water. Crew placed absorbent dike to stop down gradient flow and protect storm drain. Crew did not observe any sign of leak from transformer and pumped oil and water from gutter, using absorbents to complete cleanup. It was considered motor oil, not transformer oil.</p>	Lubricating Fluids
Merced Service Center	01/27/2005	Merced	Area 5	<p>While a vault was pumping the hydraulic pump failed and hydraulic fluid was released in to the water being pumped. It was raining and the fluid went down the street into the storm drain, Merced County and O&amp;E were notified.</p>	Hydraulic Fluids

Significant Spill and Leaks of Hazardous Pollutants Associated with Utility Vaults

Woodland Service Center	12/01/2005	Yolo	Area 6	<p>During a rainstorm, an underground transformer failed and spilled approximately 30 gallons of oil that was lab tested at &lt;5ppm PCB. Most of the oil was contained in the enclosure. However, due to the velocity of the failure, some of the oil impacted local vegetation and soil and potentially could have reached a nearby storm drain. Crews responded immediately to restore power and perform the cleanup. Yolo County Environmental Health was on scene to oversee the cleanup. The county was satisfied.</p>	Insulating Oil with less than 5 ppm PCBs
Napa Service Center	12/15/2004	Napa	Area 7	<p>City water main carrying water under 120 psi burst and flooded an underground plywood vault. The pressure of the water displaced 50 gallons of oil from the transformer leaving it filled with rocks and dirt. There were no visible traces of oil. Oil is presumed to have been washed into the city storm drain system. Napa County Public Works confirmed no clean-up was necessary.</p>	Insulating Oil with less than 5 ppm PCBs
Vallejo Service Center	02/23/2006	Solano	Area 7	<p>A sub-surface transformer failed and sprayed a small amount of oil on a parked car. The majority of the oil remained in the vault. Colby Laplance, Solano County Resource Management, inspected the clean up.</p>	Insulating Oil with less than 5 ppm PCBs

**Attachment D - The Water Discharge Record and Underground (UG) Substructure Vault Inspection Form**

Date: \_\_\_\_\_ Start Time: \_\_\_\_\_ End Time: \_\_\_\_\_

UG Substructure Location: \_\_\_\_\_

Vault/Manhole Number: \_\_\_\_\_ Water Depth: \_\_\_\_\_

*Inspection of UG Substructure Directions: Make note of general UG substructure conditions or integrity such as cleanliness, condition of equipment, and general observations that may indicate a potential release could happen.*

Inspection of UG Substructure: Condition/Integrity of lid \_\_\_\_\_

Condition/Integrity of UG Substructure \_\_\_\_\_

Condition of equipment within UG Substructure \_\_\_\_\_

**NOTE:** If any of these vault equipment conditions threaten a release, please contact the Environmental Service representative, the Plan may need to be updated.

**Before discharging, check the following vault water conditions:**

	Cloudiness	Discoloration	Unusual Odor	Oil Sheen	Soil Particles	Asphalt Tar
YES						
NO						

1. If any "Yes" box is checked for soil particles or cloudiness, the water **CAN BE DISCHARGED WITH CONDITIONS**. The water may be discharged onto terrain provided it does not run off into streets, storm drains, sanitary sewers, small creeks, or streams or create erosion. Obtain permission from landowner if possible. Permission from landowner obtained: \_\_\_\_\_ Yes, \_\_\_\_\_ No
2. If any "Yes" box is checked for discoloration (except "tea" color from contact with soil or a "green color" from contact with vegetation or algae), oil sheen, unusual odors, or asphalt tar, **DO NOT DISCHARGE!** Any vault water that is not suitable for discharging must be containerized and characterized for disposal. Contact local EFS immediately. Quantity of drums: \_\_\_\_\_
3. If all boxes are checked "No", the clear vault water **CAN BE DISCHARGED** while being monitored. Prevent surface erosion and check to make sure that sediment and debris are not entrained. Discharge areas are cleaned and flows are directed to minimize contamination of discharge from the vault. The discharge is protected from any hazardous materials.

Estimate the volume of the clear discharged water. \_\_\_\_\_ Gallons (1 cubic ft.=7.5 gallons)

Based upon information collected above is follow-up work required:

Yes, explain: \_\_\_\_\_ No: \_\_\_\_\_

Discharges  $\geq$  50,000 gallons must report to Municipality \_\_\_\_\_

Electric Preventive Corrective Maintenance (EPCM) Tag No.: \_\_\_\_\_

Related EPCM Tag No.: \_\_\_\_\_

Name/Phone number (Print) \_\_\_\_\_ Signature \_\_\_\_\_

**These records must be retained for a minimum of five years at each of the operating headquarters.**

**Attachment E- Annual Certification and Checklist of Pollution Prevention Practices (PPPs)**

Date of Inspection: \_\_\_\_\_ Location of Vault: \_\_\_\_\_

Regional Board: \_\_\_\_\_

Name of Personnel conducting inspection \_\_\_\_\_

**This form must be completed during each sampling event.**

Pollution Prevention Practice (PPP)	General Description of PPP	Evaluation of PPP (and revisions to Plan)
Good Housekeeping	Discharge areas are cleaned and flows are directed to minimize contamination of discharge from the vault. The discharge is protected from any hazardous materials.	
Preventive Maintenance	The wastewater management devices are inspected, maintained and tested to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.	
Spill Prevention and Response Procedures	Areas are identified where potential spills can occur and their accompanying drainage points material handling procedures, storage requirements, and use of equipment are specified. Appropriate personnel have procedures for cleaning up spills identified in the Plan. Necessary equipment to implement a clean up is available and any waste generated is disposed of properly.	
Inspections	Areas are inspected during discharge, and appropriate actions are taken in response to the inspections. Records of inspection, inspector, and trained inspector are maintained. Water testing/evaluation in Water Discharge Record and Vault Inspection Form is completed and documented prior to discharging.	
Employee Training	Employee training is described to implement activities identified in the Plan. Topics are addressed such as spill response, good housekeeping, and material management practices.	
Record Keeping and Internal Reporting Procedures	<p>All reporting is documented as listed below.</p> <ul style="list-style-type: none"> <li>• Municipal Separate Storm Sewer Systems reporting for discharges ≥ 50,000 gallons to appropriate local agency within 24 hours, contact Environmental Field Service personnel to assist.</li> <li>• Report any noncompliance that may endanger health or the environment to the appropriate Regional Board. Must be provided orally within 24 hours. Written submission within 5 days.</li> <li>• Required sample results reported in annual report.</li> <li>• Reporting any oil spill into a water body to the National Response Center at (800) 424-8802 (24 hours). Contact Environmental Field Service personnel to assist.</li> <li>• Reporting spills to appropriate local agency, such as the fire department, to assist in cleanup and notify appropriate Plan team member and Environmental Field Service personnel. Provide description of incident, along with other information describing the quality and quantity of discharges, date and time of occurrence, mode of dumping, responsible parties, weather conditions, duration and cause, response procedures, resulting environmental problems and persons notified.</li> </ul>	
Sediment and Erosion Control	Areas are described and identified that, due to topography, activities, or other factors, have a high potential for significant soil erosion. Identify structural, vegetative, and/or stabilization measures to be used to limit erosion.	
Management of Runoff	A description of considerations of the appropriateness of traditional storm water management practices (practices other than those that control the generation or source(s) of pollutants) is used to divert, infiltrate, reuse, or otherwise manage runoff in a manner that reduces pollutants in discharges from the site.	

Return completed inspection form to: Sara Everitt (415-973-0707) or Elizabeth Frantz (925-866-5472)