3.10 Hazards and Hazardous Materials

Information contained in this section is summarized from publicly available information including the Department of Toxic Substances (DTSC) EnviroStor and State Water Resources Control Board's (SWRCB) GeoTracker). A *Hazard Assessment* was conducted for the project to evaluate the potential risk of release associated with the proposed isopentane tanks. This assessment is included in Appendix I of this EIR.

3.10.1 Existing Conditions

A hazardous material is defined 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 if released into the workplace or the environment. The term "hazardous materials" refers to both hazardous substances and hazardous wastes. Under federal and state laws, any material, including waste, may be considered hazardous if it is specifically listed by statute as such or if it is toxic, ignitable, corrosive, or reactive. The potential for an accident is increased in regions near roadways that are frequently used for transporting hazardous material and in regions with agricultural or industrial facilities that use, store, handle, or dispose of hazardous material. Hazardous material incidents are one of the most common technological threats to public health and the environment. Incidents may occur as the result of natural disasters, human error, and/or accidents (Imperial County 2015).

Records Review

EnviroStor

DTSC maintains EnviroStor, a data management system for tracking cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further. A desktop review was completed on February 2, 2024, for the project site. No hazards facilities and sites were identified to on the project site or within one mile of the project site (DTSC 2024).

GeoTracker

Geotracker GIS data from the SWRCB was used to review regulatory data about underground fuel tanks, fuel pipelines, and public drinking water supplies. Site information from the Spills, Leaks, Investigations, and Cleanups Program is also included in GeoTracker. A desktop review was completed on February 2, 2024, for the project site. No reported cases were found on the project site or within one mile of the project site (SWRCB 2024).

Hazardous Materials on Project Site

The proposed Dogwood geothermal power plant would be located within the existing fenceline of the Heber 2 Geothermal Energy Complex (HGEC), operated by the Second Imperial Geothermal Company, a subsidiary of ORMAT which includes the Heber 2, Heber South, and Goulds 2 geothermal energy facilities located at 855 Dogwood Road, Heber, CA (APN 054-250-31). There are currently five 10,000-gallon isopentane vessels within the HGEC. Isopentane is a watery colorless liquid with a gasoline-like odor. It is considered to be extremely flammable and has the potential to explode when

heating (International Labour Organization 2014). There are no other isopentane tanks or OECs within the ignition zone identified for the proposed isopentane tank.

Wildfire Risk

The project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial 1997). The project site is not located in areas considered wildlands, as the vast majority of the surrounding area is cultivated farmlands. According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the project area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2023).

Airports

The nearest airport to the project site is the Calexico International Airport, located approximately two miles southeast of the project site. According to Figure 3B of the Imperial County Airport Land Use Compatibility Plan (ALUCP), no portion of the project site is located within the Calexico International Airport's land use compatibility zones (ALUC 1996).

3.10.2 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the project.

Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act, commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over 5 years, $1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. The Comprehensive Environmental Response, Compensation, and Liability Act established prohibitions and requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified.

Emergency Planning Community Right-to-know Act of 1986 (42 United States Code 11011 et seq.)

The Emergency Planning Community Right-to-Know Act was included under the Superfund Amendments and Reauthorization Act (SARA) law and is commonly referred to as SARA Title III. Emergency Planning Community Right-to-Know was passed in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. These concerns were triggered by the disaster in Bhopal, India, in which more than 2,000 people suffered death or serious injury from the accidental release of methyl isocyanate. To reduce the likelihood of such a disaster in the U.S., Congress imposed requirements on both states and regulated facilities.

Emergency Planning Community Right-to-Know establishes requirements for federal, state, and local governments, Indian Tribes, and industry regarding emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. SARA Title III requires states and local emergency planning groups to develop community emergency response plans for protection from a list of Extremely Hazardous Substances (40 CFR 355). The Emergency Planning Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. In California, SARA Title III is implemented through the California Accidental Release Prevention.

Federal Insecticide, Fungicide, and Rodenticide Act

The objective of Federal Insecticide, Fungicide, and Rodenticide Act is to provide federal control of pesticide distribution, sale, and use. All pesticides used in the U.S. must be registered (licensed) by the EPA. Registration assures that pesticides would be properly labeled and that, if used in accordance with specifications, they would not cause unreasonable harm to the environment. Use of each registered pesticide must be consistent with use directions contained on the label or labeling.

Federal Water Pollution Control Act (Clean Water Act)

The objective of the Federal Water Pollution Control Act, commonly referred to as the CWA, is to restore and maintain the chemical, physical, and biological integrity of the nation's waters by preventing point and nonpoint pollution sources, providing assistance to publicly owned treatment works for the improvement of wastewater treatment, and maintaining the integrity of wetlands. The oil SPCC Program of the CWA specifically seeks to prevent oil discharges from reaching waters of the U.S. or adjoining shorelines. Further, farms are subject to the SPCC rule if they:

- Store, transfer, use, or consume oil or oil products
- Could reasonably be expected to discharge oil to waters of the U.S. or adjoining shorelines. Farms that meet these criteria are subject to the SPCC rule if they meet at least one of the following capacity thresholds:
    - Aboveground oil storage capacity greater than 1,320 gallons
    - Completely buried oil storage capacity greater than 42,000 gallons

However, the following are exemptions to the SPCC rule:

- Completely buried storage tanks subject to all the technical requirements of the underground storage tank regulations
- Containers with a storage capacity less than 55 gallons of oil
- Wastewater treatment facilities
- Permanently closed containers
- Motive power containers (e.g., automotive or truck fuel tanks)

Hazardous Materials Transport Act – Code of Federal Regulations

The Hazardous Materials Transportation Act was published in 1975. Its primary objective is to provide adequate protection against the risks to life and property inherent in the transportation of hazardous material in commerce by improving the regulatory and enforcement authority of the Secretary of

Transportation. A hazardous material, as defined by the Secretary of Transportation is, any “particular quantity or form” of a material that “may pose an unreasonable risk to health and safety or property.”

Occupational Safety and Health Administration

Occupational Safety and Health Administration’s (OSHA) mission is to ensure the safety and health of America's workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA standards are listed in 29 CFR Part 1910.

The OHSA Process Safety Management of Highly Hazardous Chemicals (29 CFR Part 110.119) is intended to prevent or minimize the consequences of a catastrophic release of toxic, reactive, flammable, or explosive highly hazardous chemicals by regulating their use, storage, manufacturing, and handling. The standard intends to accomplish its goal by requiring a comprehensive management program integrating technologies, procedures, and management practices.

Resource Conservation and Recovery Act

The goal of the Resource Conservation and Recovery Act, a federal statute passed in 1976, is the protection of human health and the environment, the reduction of waste, the conservation of energy and natural resources, and the elimination of the generation of hazardous waste as expeditiously as possible. The Hazardous and Solid Waste Amendments of 1984 significantly expanded the scope of RCRA by adding new corrective action requirements, land disposal restrictions, and technical requirements. The corresponding regulations in 40 CFR 260-299 provide the general framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste.

State

California Department of Conservation, Division of Oil, Gas, and Geothermal Resources

The Division of Oil, Gas, and Geothermal Resources was formed in 1915 to address the needs of the state, local governments, and industry by regulating statewide oil and gas activities with uniform laws and regulations. The Division supervises the drilling, operation, maintenance, and plugging and abandonment of onshore and offshore oil, gas, and geothermal wells, preventing damage to: (1) life, health, property, and natural resources; (2) underground and surface waters suitable for irrigation or domestic use; and (3) oil, gas, and geothermal reservoirs. The Division’s programs include: well permitting and testing; safety inspections; oversight of production and injection projects; environmental lease inspections; idle-well testing; inspecting oilfield tanks, pipelines, and sumps; hazardous and orphan well plugging and abandonment contracts; and subsidence monitoring.

California Department of Toxic Substances Control

DTSC regulates hazardous waste, cleans-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. Approximately 1,000 scientists, engineers, and specialized support staff are responsible for ensuring that companies and individuals handle, transport, store, treat, dispose of, and clean-up hazardous wastes appropriately. Through these measures, DTSC contributes to greater safety for all Californians, and less hazardous waste reaches the environment.

On January 1, 2003, the Registered Environmental Assessor program joined DTSC. The program certifies environmental experts and specialists as being qualified to perform a number of environmental

assessment activities. Those activities include private site management, Phase I ESAs, risk assessment, and more.

California Division of Occupational Safety and Health

The California Division of Occupational Safety and Health protects workers and the public from safety hazards through its programs and provides consultative assistance to employers. California Division of Occupational Safety and Health issues permits, provides employee training workshops, conducts inspections of facilities, investigates health and safety complaints, and develops and enforces employer health and safety policies and procedures.

California Environmental Protection Agency

California Environmental Protection Agency and the SWRCB establish rules governing the use of hazardous materials and the management of hazardous waste. Applicable state and local laws include the following:

- Public Safety/Fire Regulations/Building Codes
- Hazardous Waste Control Law
- Hazardous Substances Information and Training Act
- Air Toxics Hot Spots and Emissions Inventory Law
- Underground Storage of Hazardous Substances Act
- Porter-Cologne Water Quality Control Act

Within Cal-EPA, DTSC has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the state agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law.

California Emergency Response Plan

California has developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local government and private agencies. Response to hazardous materials incidents is one part of this plan. The plan is managed by the State Office of Emergency Services (OES), which coordinates the responses of other agencies including Cal-EPA, the California Highway Patrol, CDFW, RWQCB, Imperial County Sheriff's Department, ICFD, and the City of Imperial Police Department.

Local

Imperial County General Plan

The Seismic and Public Safety Element identifies goals and policies that will minimize the risks associated with natural and human-made hazards, and specify the land use planning procedures that should be implemented to avoid hazardous situations. The purpose of the Seismic and Public Safety Element is to reduce the loss of life, injury, and property damage that might result from disaster or accident. In addition, the Element specifies land use planning procedures that should be implemented to avoid hazardous situations. The policies listed in the Seismic and Public Safety Element are not applicable to the proposed project, as they address human occupancy development.

Imperial County Public Health Department

DTSC was appointed the Certified Unified Program Agency (CUPA) for Imperial County in January 2005. The Unified Program is the consolidation of 6 state environmental programs into one program under the authority of a CUPA. The CUPA inspects businesses or facilities that handle or store hazardous materials, generate hazardous waste, own or operate ASTs or USTs, and comply with the California Accidental Release Prevention Program. The CUPA Program is instrumental in accomplishing this goal through education, community and industry outreach, inspections and enforcement.

County of Imperial Office of Emergency Services

As part of the ICFD, the County OES is mandated by the California Emergency Services Act (Chapter 7, Division 1, Title 2 of Government Code) to serve as the liaison between the State and all the local government in the County. The OES provides centralized emergency management during major disasters, and coordinates emergency operations between various local jurisdictions within the County. The OES has developed several plans, consistent with federal and state policy guidance, to provide the County and participating local jurisdictions and agencies a framework for conducting emergency planning, response, and recovery operations, and handling of hazardous substances.

Imperial County Airport Land Use Compatibility Plan

The Imperial County ALUCP provides the criteria and policies used by the Imperial County Airport Land Use Commission to assess compatibility between the principal airports in Imperial County and proposed land use development in the areas surrounding the airports. The ALUCP emphasizes review of local general and specific plans, zoning ordinances, and other land use documents covering broad geographic areas.

3.10.3 Impacts and Mitigation Measures

This section presents the significance criteria used for considering project-related impacts related to hazards and hazardous materials, the methodology employed for the evaluation, and mitigation requirements, if necessary.

Thresholds of Significance

Based on CEQA Guidelines Appendix G, project impacts related to hazards and hazardous materials are considered significant if any of the following occur:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
- 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
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school
- 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 create a significant hazard to the public or the environment

- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires

Methodology

This analysis evaluates the potential for the project, as described in Chapter 2, Project Description to result in significant impacts related to hazards and hazardous materials on or within the 1-mile buffer zone of the project site. This analysis considers whether these conditions would result in an exceedance of one or more of the applied significance criteria as identified above.

Information from Envirostor and GeoTracker were reviewed to present the existing conditions, in addition to identifying potential environmental impacts, based on the significance criteria presented above. Impacts associated with hazards and hazardous materials that could result from project construction and operational activities were evaluated qualitatively based on site conditions; expected construction practices; materials, locations, duration of project construction, and related activities. The conceptual site plan for the project was also used to evaluate potential impacts.

Impact Analysis

Impact 3.10-1 Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Although considered minimal, it is anticipated that the proposed project will use the following materials during construction, operation, and long-term maintenance: insulating oil (used for electrical equipment), lubricating oil (used for maintenance vehicles), various solvents/detergents (equipment cleaning), and gasoline (used for maintenance vehicles). These materials have the potential to be released into the environment as a result of natural hazard (i.e., earthquake) related events, or because of human error. However, all materials contained on project site will be stored in appropriate containers (not to exceed a 55-gallon drum) protected from environmental conditions, including rain, wind, and direct heat and physical hazards such as vehicle traffic and sources of heat and impact. In addition, if the on-site storage of hazardous materials necessitate, at any time during construction and/or operations and long-term maintenance, quantities in excess of 55-gallons, a hazardous material management program (HMMP) would be required. The HMMP developed for the projects will include, at a minimum, procedures for:

- Hazardous materials handling, use and storage
- Emergency response
- Spill control and prevention
- Employee training
- Record keeping and reporting

Spill response plans would be developed prior to project construction and operation or prior to the storage on-site of an excess of 55 gallons of hazardous materials, and personnel would be made aware of the procedures for spill cleanup and the procedures to report a spill. Spill cleanup materials and equipment appropriate to the type and quantity of chemicals and petroleum products expected would be located onsite and personnel shall be made aware of their location.

The small quantities of chemicals to be stored at the project site during construction include equipment and facilities maintenance chemicals. These materials would be stored in their appropriate containers in an enclosed and secured location, such as portable outdoor hazardous materials storage cabinets equipped with secondary containment to prevent contact with rainwater. The portable chemical storage cabinets may be moved to different locations around the project site as construction activity locations shift. The chemical storage area would not be located immediately adjacent to any drainage. Disposal of excess materials and wastes would be performed in accordance with local, state, and federal regulations. Additionally, hazardous material storage and management will be conducted in accordance with requirements set forth by the ICFD, Imperial County Office of Emergency Services, DTSC, and CUPA for storage and handling of hazardous materials. Further, construction activities would occur according to OSHA regulatory requirements.

Hazard Assessment – Isopentane Storage/Use

The OEC units for the proposed Dogwood geothermal plant require the installation of two 20,000-gallon isopentane vessels for storage of motive fluid used in geothermal energy production. Isopentane is a regulated substance by the USEPA. The HGEC is classified as Prevention Program 3 and is regulated by USEPA's Risk Management Program for Chemical Accidental Release Prevention (40 CFR 68 .20-68.42) because isopentane is stored on site in excess of 10,000 lbs. Isopentane would be delivered to the project site by a licensed commercial transport company, in accordance with US DOT regulations for the transport of dangerous goods.

A Hazard Assessment (HA) was prepared to assess the potential effects and risks of the additional isopentane storage/use by the proposed Dogwood geothermal plant (Appendix I of this EIR). The HA was conducted to fulfill the Hazard Assessment Offsite Consequence Analysis (OCA) requirements of the following regulations:

- 40 CFR §68.65 – Environmental Protection Agency (EPA) “Risk Management Plan (RMP)”
- 19 CCR 2750.1 to 2750.9 – California Code of Regulation “California Accidental Release Prevention (CalARP) Program”

The HA analyzed the isopentane storage/use by identifying the worst-case scenario and endpoints of concern (as defined by EPA RMP and 40 CFR 68.22) including the following:

1. Explosion (an overpressure of 1 pound per square inch [psi])
2. Radiant heat/Exposure Time (a radiant heat of 5 kW/m^2 for 40 seconds)
3. Lower Flammability Limit (as provided by NFPA)

The Areal Locations of Hazardous Atmospheres (ALOHA) modeling software was used to determine the distance to the endpoint for the worst-case release scenario analysis. Please refer to the Appendix I for a detailed discussion of the modeling assumptions. The vulnerability zone resulting from this analysis was then reviewed. A vulnerability zone is defined as a circle whose center is the point of

release and its radius is the length of the endpoint, which is predicted by the dispersion model (e.g., ALOHA).

Using the criteria mentioned above, the HA assessed the worst-case scenario of a catastrophic failure of one of the two new 20,000-gallon isopentane tanks. The storage vessel is capable of storing a maximum of 18,000 gallons of isopentane, taking into account administrative controls. According to the Chevron Philips Chemical Company safety data sheet, the density of isopentane is 5.14 lbs./gal, which yields a total mass of 92,520 pounds of isopentane held in the storage vessel. The worst-case scenario considers the catastrophic failure of the 20,000-gallon isopentane storage vessel, which would result in a release of the entire contents of the vessel, into the secondary containment area. As modeled in the HA, the worst-case scenario event would have an impact up to 0.068 miles, or 357 feet (Table 3.10-1). There are zero residents and zero housing units within 357 feet.

Table 3.10-1. Worst-Case Scenario Results Summary

Worst-Case Release Scenario	Regulated Substance	Endpoint	Endpoint Distance
20,000 gallon	Isopentane	Overpressure of 1 pound per square inch	119 yards/ 357 feet/ 0.068 miles

Source: Appendix I of this EIR

The HA model contains built in mitigation assumptions. Specifically, once a release has occurred, mitigation systems (structures, equipment, or activities) that help minimize the transport of material to the atmosphere would be activated. Mitigation systems can be characterized as passive or active systems:

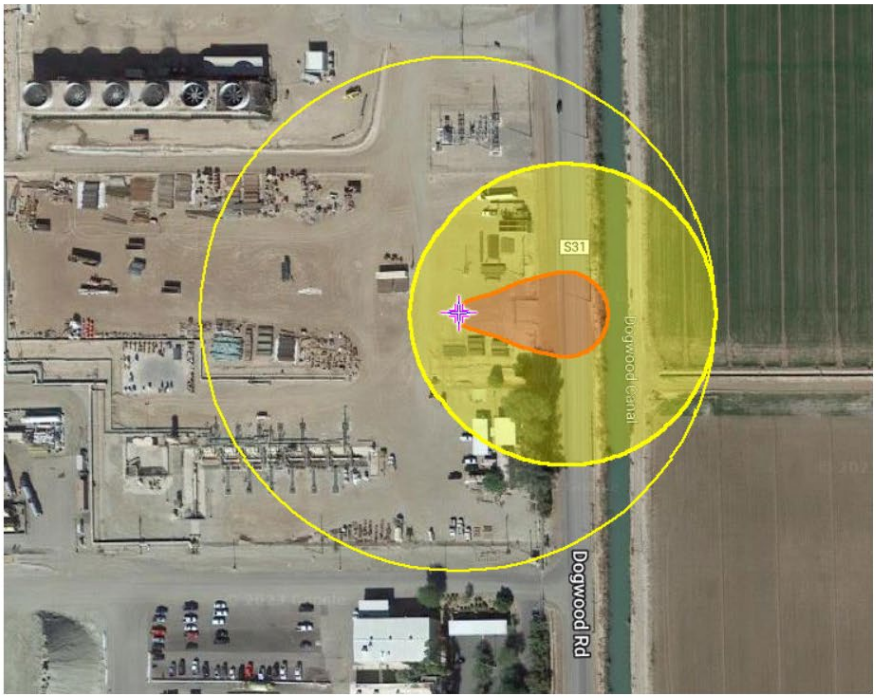
- ***Passive mitigation*** systems do not require activation, an energy source, or movement of components to perform their intended function.

- ***Active mitigation*** systems do require activation, an energy source, and/or movement of components to perform their intended function.

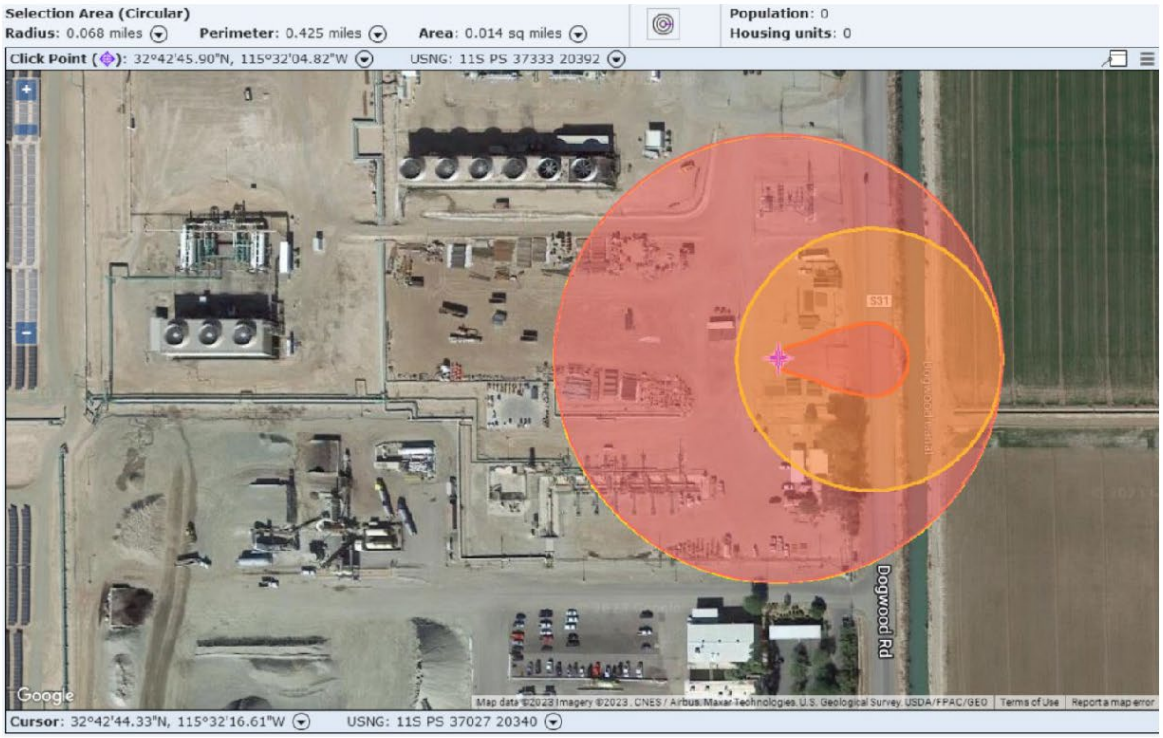
For the worst-case release scenario, the secondary containment area built with concrete around the isopentane vessel was considered as a passive mitigation system in the offsite consequence analysis. The dimensions of the containment area determine the surface area of the pool of isopentane that will lead to the worst-case scenario of the vapor cloud explosion. There are no other isopentane or OECs within the ignition zone associated with the proposed isopentane tank; therefore, the would be no associated cascading ignition events.

The closest potentially affected public receptors during a worst-case scenario are the residences approximately 3,500 feet to the northeast of the isopentane tanks. However, the proposed location of the proposed isopentane storage tanks is 125 feet from S. Dogwood Road. As shown in Figure 3.10-1, if a member of the public were driving along S. Dogwood Road at the time of the worst-case scenario they could suffer injury. In addition, fire rescue crews could also suffer injury responding to an isopentane leak or explosion; therefore, there is a potentially significant impact to the public through the use of isopentane. Implementation of Mitigation Measure HAZ-1 would reduce potential hazards to the public attributed to the storage, transport, and use of isopentane motive fluid to levels less than significant.

Figure 3.10-1. Worst-Case Modeling



WCS MARPLOT 5.1.1 Map for Isopentane Storage Vessel



Receptors Within the Threat Zone

Source: Appendix I of this EIR

Mitigation Measure(s)

HAZ-1 **Isopentane Management Measures.** A certified fire protection engineer survey and analysis of current and proposed fire suppression and detection equipment will be performed to evaluate the current systems performance and coverage of protection prior to construction. This analysis will evaluate proposed fire suppression and detection equipment in conjunction with existing equipment and be reviewed and approved by the Imperial County Fire Department and OES prior to building permits approval. The following measures will be required for the project:

1. All isopentane storage tanks will be protected by approved automatic fire suppression equipment. All automatic fire suppression will be installed and maintained to the current adapted fire code and regulation.
2. An approved automatic fire detection system will be installed as per the California Fire Code. All fire detection systems will be installed and maintained to the current adapted fire code and regulations.
3. Fire department access roads and gates will be in accordance with the current adapted fire code and the facility will maintain a Knox Box for access on site.
4. Applicants will provide product containment areas(s) for both product and water run-off in case of fire applications and retained for removal.
5. Each tank will be equipped with an automated water suppression system.
6. Each tank will be equipped with two flame detectors and one gas detector (for a total of 4 flame detectors and 2 gas detectors for the two tanks).
    a. In the case of an isopentane leak, the gas detector(s) will detect it immediately and send a notification to the operator at the control room (manned 24/7) to mobilize fixing the leak.
    b. In case of a fire, the flame detector(s) will detect it and immediately start the automatic fire suppression system.
    c. In case of a fire, there will also be a horn and strobe system that will turn on automatically to alert the plant employees.
7. Concrete containment areas will be constructed for the isopentane tanks.
8. Isopentane vessels will rarely be filled to 90 percent capacity.
9. Isopentane safety-control measures will be established.
10. A blast wall will be built between the two proposed isopentane vessels.
11. Diking and impoundment of the proposed isopentane tanks shall be installed to minimize the magnitude and extent of a tank failure.

Significance after Mitigation

Implementation of Mitigation Measure HAZ-1 would require a certified fire protection engineer survey and analysis of current and proposed fire suppression and detection equipment to be performed to evaluate the current systems performance and coverage of protection prior to construction. This would ensure that the proposed isopentane tanks are designed to be equipped with fire suppression systems.

Implementation of Mitigation Measure HAZ-1 would reduce potential hazards to the public attributed to the storage, transport, and use of isopentane motive fluid to levels less than significant.

Impact 3.10-2 ***Would the project 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?***

As discussed under Impact 3.10-1, a HA for the worst-case scenario leak/release of isopentane was conducted. Despite the closest residents being outside the radius of concern (399 feet) from the simulated explosion, there is still a potentially significant hazard to members of the public (Figure 3.10-2). This would occur if a member of the public was using S. Dogwood Rd adjacent to the isopentane tank at the time of the worst-case scenario explosion. In addition, there is a potentially significant hazard created for first responders responding to the potential explosion. Hazards include fire, exposure to vapors, and potential burns. However, through the implementation of Mitigation Measure HAZ-1, the potentially significant hazard to the public through reasonably foreseeable upset and accident conditions involving the release of isopentane would be reduced to a less than significant level.

In addition, a review of information from EnviroStor and GeoTracker reveals the project site is not listed as a hazardous materials site and there are no active sites that require cleanup, such as LUST Sites, Department of Defense Sites, and Cleanup Program Sites within one mile of the project site. No significant hazard to the public is anticipated attributable to past hazardous materials or active cleanups sites.

Mitigation Measure(s)

No additional mitigation measures beyond Mitigation Measure HAZ-1 are required.

Impact 3.10-3 ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?***

The project site is not located within one-quarter mile of an existing school. The closest school is Heber Elementary School, located approximately 0.60 miles to the north of the project site. Therefore, the project would have no impact on emitting or handling hazardous or acutely hazardous materials substances or waste within one-quarter mile of an existing or proposed school.

Mitigation Measure(s)

No mitigation measures are required.

Impact 3.10-4 ***Would the project 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 create a significant hazard to the public or the environment?***

As discussed under Impact 3.10-2, the project site is not listed as a hazardous materials site on EnviroStor and GeoTracker. Therefore, implementation of the project would result in no impact related to the project site being located on a listed hazardous materials site pursuant to Government Code Section 65962.5.

Mitigation Measure(s)

No mitigation measures are required.

Impact 3.10-5 ***For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?***

The nearest airport to the project site is the Calexico International Airport, located approximately two miles southeast of the project site. According to Figure 3B of the Imperial County Airport Land Use Compatibility Plan (ALUCP), no portion of the project site is located within the Calexico International Airport's land use compatibility zones (ALUC 1996). Therefore, implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact would occur.

Mitigation Measure(s)

No mitigation measures are required.

Impact 3.10-6 ***Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

Imperial County Office of Emergency Services has provided three plans addressing evacuation and evacuation responsibilities for County Fire, Police, and the OES among other topics related to emergency preparedness. The three plans (IC Emergency Operations Plan; Multi-Jurisdiction Hazard Mitigation Plan; and Hazardous Materials Area Plan) do not identify specific evacuation routes.

The project applicants would coordinate any construction activities and use of oversized loads or movement of construction/decommissioning equipment with Imperial County Department of Public Works (ICDPW) and/or California Department of Transportation (Caltrans) and the El Centro Highway Patrol office. Further, the project applicants shall coordinate with DPW for any requested dedication of rights-of-way needed for S. Dogwood Road for the consideration of existing and any future road needs. Lastly, the project applicants shall file for an encroachment permit for any work or proposed work in the affected County or Caltrans road rights-of-way and for any and all new, altered or unauthorized existing driveway(s) to access the lot or lots and for any proposed road crossings. Thus, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the project would result in a less than significant impact associated with the possible impediment to emergency response plans or emergency evacuation plans.

Mitigation Measure(s)

No mitigation measures are required.

Impact 3.10-7 ***Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

The project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan, the potential for a major fire in the unincorporated areas of the County is generally low (County of Imperial 1997). The project site is not located in areas

considered wildlands, as the vast majority of the surrounding area is cultivated farmlands. According to the Fire Hazard Severity Zone Viewer provided by the California Department of Forestry and Fire Protection, the project area is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2023). Therefore, there would be no impact associated with risk involving wildland fires.

Mitigation Measure(s)

No mitigation measures are required.

3.10.4 Decommissioning/Restoration and Residual Impacts

Decommissioning/Restoration

During decommissioning and restoration of the project site, the applicants or its successor in interest would be responsible for the removal, recycling, and/or disposal of all solar arrays, inverters, transformers and other structures on the project site. The project applicants anticipate using the best available recycling measures at the time of decommissioning.

Solar panels are considered an RCRA-regulated waste. Solar panels used for the proposed solar facilities may contain materials such as cadmium, lead, or selenium. Thus, solar panels would be required to be disposed of at facilities permitted to accept such material (Class I; hazardous wastes). Clean Harbors Waste north of the project site is permitted to dispose of Class 1 waste materials and would be utilized to prevent any impact associated with their disposal.

Decommissioning/restoration activities would not result in a potential impact associated with wildfires (the project site is not susceptible to wildfires) or impediment to an emergency plan.

Residual

Implementation of Mitigation Measure HAZ-1 would reduce potential hazards to the public attributed to the storage, transport, and use of isopentane motive fluid to levels less than significant. Adherence to federal, state and local regulations will ensure that impacts related to the transportation of hazardous materials and potential fires would be reduced to levels less than significant. Based on these circumstances, the proposed project would not result in residual significant and unmitigable impacts related to hazards and hazardous materials.