

Notice of Exemption

Appendix E

To: Office of Planning and Research
 P.O. Box 3044, Room 113
 Sacramento, CA 95812-3044
 County Clerk
 County of: Stanislaus
 P.O Box 1670
 Modesto, CA 95354

From: (Public Agency): Turlock Irrigation District
333 East Canal Drive
Turlock, CA 95380

(Address)

2018 NOV 14 AM 9:42
 STANISLAUS CO. CLERK-RECORDS
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FILED

Project Title: 230 KV Pole Painting
 Project Applicant: Turlock Irrigation District

Project Location - Specific:
 See attached map.

Project Location - City: Ceres, Turlock, Keys, ^{Patterson} ~~Patterson~~ Project Location - County: Stanislaus

Description of Nature, Purpose and Beneficiaries of Project:
 The Project consists of painting of existing 230KV corroded poles which serve power to TID and MID. The painting project will increase the life of existing poles. These 230KV poles are backbone for TID and MID to serve power to its customers. Existing paint and corrosion will be removed from poles and will be repainted with low-VOC paints to prevent further deterioration.

Name of Public Agency Approving Project: Turlock Irrigation District (TID)

Name of Person or Agency Carrying Out Project: Sukhdeep Gill

Exempt Status: (check one):

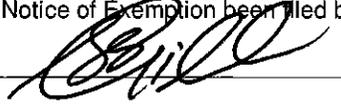
- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: 15301 C:1
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:
 The project is to maintain existing structures. The project's categorical exemption status is not limited by any of the CEQA exceptions (See attached document).

Lead Agency
 Contact Person: Sukhdeep Gill Area Code/Telephone/Extension: 209-883-8413

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature:  Date: 11-14-2018 Title: Sr. Electrical Engineer

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
 Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

PART V NOTICE OF EXEMPTION

The joint Modesto Irrigation District (MID) and Turlock Irrigation District (TID) Westley/Walnut/Parker 230kV Pole Painting Project is an estimated 5-10-year project that consists of removing existing paint and corrosion from the tubular steel transmission poles and repainting them with low-VOC paints to prevent further deterioration of the poles.

The project qualifies for a categorical exemption listed in Article 19, Section 15301 of the California Environmental Quality Act (CEQA) Guidelines for Class 1, Existing Facilities of "both investor and publicly-owned utilities used to provide electric power, natural gas, sewage, or other public utility service." MID and TID are publicly owned utilities that provide electricity and water to service areas in greater Modesto and Turlock, CA. The Class 1 exemption applies to the "operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination." The proposed project would provide maintenance for existing steel pole structures that are corroding and would not expand existing use of the Westley/Walnut/Parker 230-kV Transmission Line.

The Secretary of Resources has identified general categories of projects that do not have a significant effect on the environment, including maintenance projects. Section 15300.2 of the Guidelines, however, lists the following exceptions to categorical exemption status: projects that would have significant cumulative impacts from successive activity of the same type in the same place over time, projects with significant effects due to unusual circumstances, projects that would cause damage to scenic resources within a state scenic highway, projects located on a site included on any list compiled pursuant to Section 65962.5 of the Government Code, and projects that would cause a substantial adverse change in the significance of a historical resource.

The poles were first painted and installed in 1974, and the paint to be removed contains lead. The proposed project is not subject to Article 19, Section 15330 for "minor actions to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous waste or substance," because the proposed action is not undertaken to address the potential release of lead paint, but rather to perform a traditional form of maintenance and prevent further corrosion of the existing poles.

The effects of the lead paint removal and pole repainting on the environment have been evaluated indicating the project would comply with air quality and worker exposure regulations and would have no significant adverse effects on any other resources, as described below. No impacts are expected to occur to agricultural resources, geology, land use/planning, mineral resources, population and housing, public services, and recreation because of the implementation of the project.

1. PROJECT SETTING

The Westley/Walnut/Parker 230kV Pole Painting Project would consist of refinishing 171 transmission poles by removing the existing paint on each pole and applying new paint. The tubular steel poles have an approximate average height of 100 feet and a minimum phase-to-phase clearance of 17.5 feet. The existing paint and corrosion would be removed from the poles and cross arms to bare metal by abrasive blast cleaning. All removed material would be captured, tested, and, if found to be hazardous, disposed of in a Class I controlled landfill.

The 37-mile 230-kV transmission line begins 3 structures west of Westley Switching Station on the western side of the San Joaquin Valley, runs primarily along canals, roads, and the edges of upland fields, crosses the San Joaquin River, and splits, with one leg of the line terminating at the Walnut Substation near the City of Turlock, CA and the other leg crossing the Tuolumne River and terminating at the Parker Substation in the City of Modesto, CA. The original project was considered in the Turlock-Modesto 230-kV Transmission Line Environmental Impact Report (EIR), which was

certified in 1974. The tubular steel poles were repainted in 1996, with a prior surface preparation of the underlying paint layers. For this current project, it would be necessary to remove all paint layers to eliminate rust and ensure appropriate adhesion and life of the paint coating. District maintenance may require the use of light towers during early morning and late evening hours. District maintenance would occur between the hours of 7 am and 7 pm.

This project would be located in areas zoned by Stanislaus County primarily as general agriculture, with some planned development, industrial, limited industrial, highway frontage, and rural residential zoning (Stanislaus County 2007).

The transmission line has three types of ownership: MID/TID jointly-owned structures, MID structures, and TID structures. The jointly-owned structures consist of 117 poles that begin three tower locations west of the Westley switching station located near Interstate 5 and Kern Canyon, extend easterly 17.3 miles along the Westley Wasteway and TID Lateral No. 2, and terminate in the vicinity of Redwood Road and the Ceres Main Canal.

The TID portion of the transmission line consists of 55 poles that run from the Redwood junction of the jointly owned line, extends 7.3 miles in a southerly direction aligning for the most part with the Ceres Main Canal, and terminates at the TID Walnut Substation near the Southern Railroad tracks south of West Main Avenue in

2. LEAD PAINT REMOVAL PROCEDURES

MID and TID requires a SSPC QP2 certified lead contractor for the proposed project and would collect representative air samples to determine the actual worker and environmental exposure to lead. Cal/OSHA's Lead in Construction Standards (Title 8 CCR 1532.1) sets an action level (AL) of 30 $\mu\text{g}/\text{m}^3$ and an 8-hour permissible exposure limit (PEL) of 50 $\mu\text{g}/\text{m}^3$ for this type of activity and requires implementation of protective measures until air monitoring indicates that exposure is at or below the PEL. Protective measures include appropriate respiratory protection (P-100 air purifying half mask), clean work clothes provided at least once a week, change areas with separate storage facilities for work and street clothes, hand washing facilities, biological monitoring (baseline blood sampling), and training.

The painting contractors would comply with all environmental regulatory requirements by capturing lead dust generated during paint removal and employing Best Management Practices (BMPs) to control releases of lead into surrounding environment. These measures consist of laying a plastic tarp at the base of each tower to collect lead paint scrapings and collecting and labeling the worker clothing sent to the laundry. All lead-contaminated wastes would be collected, sealed, and transferred to an appropriate Treatment Storage and/or Disposal Facility (TSDF).

3. CUMULATIVE EFFECTS

As described below, the pole-painting project would not have significant cumulative impacts resulting from successive projects of the same type in the same place over time. The poles occupy a 70-foot right-of-way that separates the maintenance project from other projects that may occur concurrently with the proposed project.

a. AESTHETICS

The proposed project replaces the existing paint on the 230kV transmission poles with low-VOC paint of a similar color and would not degrade the existing visual character or quality of the site and its surroundings. The project would not result in significant cumulative impacts to aesthetics, since the poles would retain the same visual quality as the original

project.

b. AIR QUALITY

The San Joaquin Valley Air Pollution Control District (SJVAPCD or "the Valley Air District") is in nonattainment of the federal and state ambient air quality standards (AAQS) ozone and particulates under the Clean Air Act (CAA). Emissions of the ozone precursors, volatile organic compounds (VOCs) and nitrogen oxides (NOX) are potentially significant, and the Valley Air District has established a significance threshold of 10 tons/year for VOCs and NOX and has adopted a plan but no significance threshold for particulates (PM10 and PM 2.5).

The Valley Air District regulations Rule 4603 stipulates that air dried paint have less than 340 g/liter (2.8 lb/gal) of VOCs or apply for an air permit. The proposed project would use paint within these limits. Emissions of VOCs would also come from vehicles, man lifts, light towers, and generators. Total VOC emissions for the 3,500 gallons of primer and final coating used in the maintenance project would be 4.9 tons. VOC emissions from the manlifts, light towers, and generators would be 2.5 tons. VOC emission from the trucks carrying workers to the pole locations would be negligible. Total VOC emissions from the entire 8-month project would be 7.4 tons, less than the significance criteria of 10 tons/year. There would be no post-maintenance emissions from the line.

Particulates would be captured. There are no significance criteria for particulate matter in the Valley Air District.

c. HAZARDS AND HAZARDOUS MATERIALS

The maintenance project would replace existing lead paint with low-VOC, lead-free paint. The removal of the existing paint from the poles would result in temporary increases in ambient lead dust, which would be collected in HEPA filtered vacuum equipment. Air monitoring would ensure that workers are not exposed to lead levels above the PEL, and the BMPs listed above would ensure that exposure levels in the work area meet Cal/OSHA and CDPH standards and would control the release of lead to the environment. Biological monitoring would ensure that cumulative worker exposure would not be significant.

Other hazardous materials used by contractors would include the paint and fuel for the equipment. Paint would be stored in appropriate containers in designated areas and handled to prevent accidental spills and releases. The contractor would train on-site personnel in the proper handling of these materials.

d. HYDROLOGY AND WATER QUALITY

The maintenance project would not contribute to cumulative water quality concerns in the project areas. The transmission line crosses the San Joaquin and Tuolumne Rivers, both of which were included in 2002 in the Clean Water Act (CWA) Section 303 (d) list of impaired water bodies. The release of lead and other contaminants would be controlled by the use of tarps and vacuums, described above, to collect lead paint chips and dust and prevent all but insignificant amounts of contaminants from reaching the adjacent canal waters, wetland areas, or rivers. All lead wastes would be collected, sealed and transferred to an appropriate TSDF. These BMPs would prevent further contamination of any impaired water bodies in the project area.

e. NOISE

The proposed components of the maintenance project consist of scraping and sanding equipment, diesel generator, man lifts, lighting towers, and work vehicles that would create

operational-related noise between the hours of 7am and 7pm. The duration of maintenance activity would average less than eight hours at any one location, and there would be no post-project noise associated with the line. Therefore, there would be no significant cumulative effects due to noise.

f. **TRANSPORTATION AND TRAFFIC**

The maintenance project would not have a significant cumulative impact on traffic congestion found on some city streets in Modesto and Turlock. Access routes for the proposed project are primarily through canal rights-of-way closed off to the public and edges of agricultural fields. Most of the route is located in remote agricultural areas and would have no impact on traffic.

4. **SCENIC RESOURCES WITHIN A SCENIC HIGHWAY**

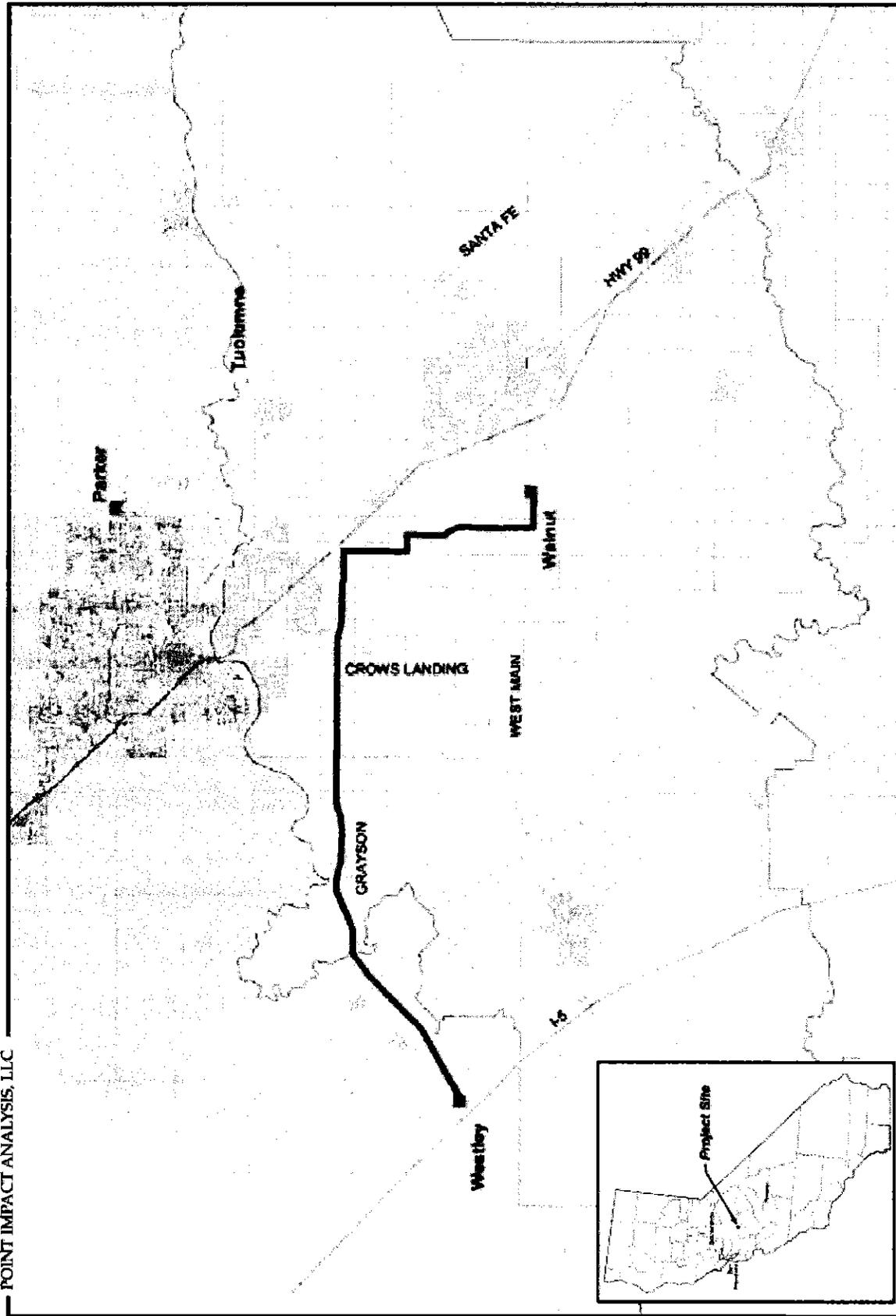
The maintenance project would not affect scenic resources within a state scenic highway, or damage trees, historic buildings, rock outcroppings, or other similar resources.

5. **CORTESE LIST**

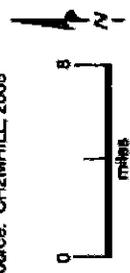
A categorical exemption is not applicable if the project is located on a site included in the Abandoned Site Assessment Program compiled pursuant to Section 65962.5 of the Government Code. MID had an Environmental Data Resources (EDR) report prepared for the locations of Cortese sites within one mile of the 230-kV line. The database search also included sites designated by the State Water Resource Control Board (LUST), the Integrated Waste Board (SWF/LS), and the Department of Toxic Substances Control (Cal-Sites). The search resulted in 30 Cortese sites within the search area; none of the sites were within 0.1 miles of the transmission pole locations. Therefore, the maintenance project is not located on a site included on any list compiled pursuant to Section 65962.5 of the Government Code.

6. **HISTORIC AND CULTURAL RESOURCES**

The pole maintenance project would not result in any substantial adverse changes to historic resources since the poles were built after 1974 and are not historic. The only change to these poles would be the exchange of peeling lead paint for new no- or low-VOC paint. There would be no damage to cultural resources, since the area is already disturbed. Therefore, the proposed pole-painting project would not impact historic or cultural resources because there are no historic or cultural resources that would be impacted by the maintenance project.



Source: CH2MHILL, 2006



Legend

- Substation
- ▬ 230-kV Transmission Line
- ▭ TID Electric Service Area
- ▭ MID Electric Service Area

Westley-Walnut-Parker
230-kV Pole Maintenance Project
FIGURE 1
PROJECT LOCATION