

**3.14 WORKER SAFETY**

This section addresses safety and health issues and describes and/or outlines systems and procedures that will be implemented to provide occupational safety and health protection for Project workers in accordance with all applicable worker health and safety LORS. All applicable elements of the Title 8 CCR, General Industry Safety Orders (GISO), Construction Safety Orders (CSO), and Electrical Safety Orders (ESO), are addressed below. The following describes the affected environment relative to worker health and safety. An outline of the principal components of the health and safety programs to be implemented during construction and operation is presented, environmental consequences and mitigation measures and applicable LORS are also discussed.

**3.14.1 Environmental Baseline**

The existing Larkspur Energy Facility is a simple-cycle nominally rated 94 MW power facility that utilizes dual fueled GE LM6000 Enhanced Sprint gas turbine engine generators. The existing Larkspur Energy Facility uses natural gas supplied via an on-site 500-foot long, approximately 8-inch interconnection from the SDG&E metering station to an existing 36-inch SDG&E line. The Project consists of an incremental amendment change to the existing Larkspur Energy Facility to include an additional natural gas turbine engine and associated ancillary facilities as described in Section 2.0, Project Description of this Amendment as well as the temporary use of a construction laydown area. Descriptions of the existing Larkspur Energy Facility and the Project's fire protection and safety features are presented below. Descriptions of hazardous material and wastes to be used and stored on the Project's site are discussed in Section 3.5, Hazardous Materials Handling, and Section 3.13, Waste Management.

**3.14.2 Environmental Consequences**

Construction, operation, and maintenance activities may expose workers to the hazards identified in Table 3.14-1, Potential Work Hazards During Facility Construction and Operation. Exposure to these hazards can be minimized through adherence to appropriate engineering design criteria and administrative controls, use of applicable PPE, and compliance with all applicable health and safety LORS. The programs, regulations, and preventive measures intended to control potential worker health and safety impacts associated with these hazards are described throughout this section. This encompasses a comprehensive health, safety, and fire prevention program and an accident/injury prevention program intended to ensure healthful and safe operations at the Project site.

**TABLE 3.14-1  
POTENTIAL WORKER HAZARDS DURING FACILITY CONSTRUCTION AND OPERATION**

Activity	Potential Hazard
<b>Facility Construction</b>	
Elevated work	Slips/trips/falls
Welding	Flash burns, explosion, thermal burns, toxic welding fumes
Excavations	Excavation/trench wall collapse, soil movement, oxygen deficiency, buildup of toxic gases, fumes, vapors, dusts or mists, wet exposures, crushing hazards, confined spaces, potentially contaminated soil/waste
Cement/forms work	Slips/trips/falls, protruding objects, caustics, punctures, and lacerations
Equipment operation	Noise exposure, vehicle accidents, load hazards, induced current
Transmission lines/ transformer station	Slips/trips/falls, electrocution, flash burns
Painting	Paint solvents, paint vapors, chemical burns, fire/explosion, slips/trips/falls
Abrasive blasting	Dust, flying particles, pressure vessels, noise
Powered hand tools	Noise, dust, flying particles, cuts, amputation, crushing
Fueling	Fire, explosion, environmental contamination
<b>Facility Operations</b>	
Generation enclosure	High voltage
Operations building	High voltage, repetitive trauma
Cooling unit	Slips/trips/falls, noise, wet exposure, chemical exposure
Transformer	Electrocution, flash burns
Gas compressor	Fire, noise, temperature, rotating equipment, pressure
Compressed gas storage	Fire, explosion
Chemical storage	Chemical splashes, burns, reactions, gases, vapors, fumes
Machinery, general	Noise, temperature extremes, rotating equipment, electrocution

### *3.14.2.1 Construction Health & Safety Program*

To protect the health and safety of workers during construction, the Applicant (or construction contractor) will ensure compliance with the Construction Health & Safety Program, and all federal, state, and local health standards that pertain to worker health and safety.

**3.14.2.1.1 Construction Injury and Illness Prevention Program**

The Construction Safety Program will meet the Cal-OSHA Injury Illness Prevention Program (IIPP) requirements. The IIPP will include:

- A written Code of Safe Practices that relates to construction operations.
- Identification of the person or persons responsible for implementing the program.
- Posting of the Code of Safe Practices at a conspicuous location at each job site office or providing it to each supervisor who shall have it readily available.
- A system for identifying workplace hazards, including inspections.
- System of ensuring employee and subcontractor compliance.
- “Toolbox” or “tailgate” meetings conducted by supervisors with employees to discuss job hazards and mitigation measures.
- Methods of communicating with employees that encourage employees to expose unsafe activities.
- Procedures for correcting unsafe conditions.

When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices. When employees are required to work near known job site hazards, they will be instructed in the recognition of the hazard, the procedures for protecting themselves from injury, and the first aid procedures in the event of injury.

**3.14.2.1.2 Construction Written Health and Safety Programs**

Written safety programs that will be implemented in conjunction with the Code of Safe Practices may include:

- Accident/Incident Reporting Procedures
- Blood-borne Pathogens Exposure Control Program
- Compressed Gas and Air Handling Systems
- Confined Space Entry Procedures
- Contractor Safety Program
- Electrical Safety Procedures
- Emergency Action Plan
- Emergency Response Procedures
- Excavation, Trenching, and Shoring Program
- Fall Protection Program
- Fire Protection and Prevention Plan
- Hand Tools and Equipment Guarding Safety Procedures
- Hazard Communication Plan (including Proposition 65 requirements)
- Hazardous Materials Handling Procedures
- Hazardous Waste Awareness Training
- Hearing Conservation Program
- Heat Stress/Cold Stress Prevention
- Heavy Equipment Procedures
- Hoist/Chain/Wire Rope/Webs/Rope Slings/Crane Procedures

- Hot Work Program (welding, cutting, and brazing)
- Industrial Hygiene Program
- Industrial Truck (forklifts) Safety
- Ladders, Scaffolds, and Work Platforms
- Lockout/Tagout Procedure
- Motor Vehicle Safety
- PPE Program
- Portable Electric and Pneumatic Tools
- Preventing Slips, Trips, and Falls
- Repetitive Stress Injuries/Ergonomics/Lifting Hazards
- Respiratory Protection Program
- Safety and Housekeeping Inspection Program
- Safety Committee and Toolbox/Tailgate Safety Meetings
- Security Program
- Signs, Tags, and Barricades
- Tools, Power- and Hand-operated

#### 3.14.2.1.3 Construction Personal Protective Equipment Program

Employees will be required to use the required PPE during construction. Required PPE will be approved for use and distinctly marked to facilitate identification and be used in accordance with the manufacturer's instructions. The PPE will be of such design, fit, and durability as to provide adequate protection against the hazards for which it is designed. The type of PPE required for each job task will be described in the job safety analysis for that task. The use of PPE for site activities includes, but is not limited to, the items specifically described in Table 3.14-2, Basic Protective Equipment Guide, and will comply with Cal-OSHA requirements. When protective-insulating equipment is used, it will comply with the Electrical Safety Code.

**TABLE 3.14-2  
BASIC PROTECTIVE EQUIPMENT GUIDE**

<b>Body Area</b>	<b>Hazards</b>	<b>Recommended Protection</b>
Eyes/Face	Low-velocity flying particles	Safety glasses with side shields
	High-velocity chips and sparks	Impact goggles or safety glasses with full face shield
	Corrosive liquid splash during transfer	Splashproof goggles and face shield
	Breaking into an acid storage system	Acid hood
	Welding - injurious light rays	Welding hood with appropriate eye filter lenses
Head/Ears	General wear, overhead rigging, material handling, maintenance, and general construction processes	Hard hat
	High noise level	Ear plugs or muff
Respiratory system	Low-hazard inert dusts	Dust mask
	Low concentration solvent vapors	Cartridge-type organic vapor respirator
	Acid mists	Cartridge-type acid mist respirator
	High-concentration dusts or vapors	Air-line respirator
	Oxygen deficiencies or gases	Self-contained breathing apparatus
Hands and arms	Handling rough or sharp objects	Leather gloves
	Handling hot objects	Insulated gloves
	Using solvents	Impervious synthetic gloves
Feet and legs	General wear for light handling	Safety-toe shoes
	Handling heavy objects	Metatarsal safety shoes
	Using brush hooks or scythes	Shin guards
	Working with corrosive liquids	Safety-toe boots
	Underground work	Safety-toe synthetic boots
Trunk and full body	Hot or corrosive liquids	Synthetic apron
	Punctures, impact, or cuts	Canvas or leather kickback apron or metal mesh apron
	Breaking acid containers	Full body suit made of appropriate materials
Fall protection/Rescue	Working from elevated structure or platform without standard railings	Safety belt and lanyard
	Vessel entry	Harness and lifeline or wristlets and lifeline
	Suspended scaffolds	Lifeline, safety belt/lanyard

A respiratory protection program complying with 8 CCR, Section 5144 and GISO requirements will be developed if required, including respirator training, fit testing, monitoring, selection, etc

**3.14.2.1.4 Fire Protection and Prevention Plan**

The Project relies on both on-site fire protection systems and local fire protection services. A Fire Protection and Prevention Plan will be developed and followed throughout all phases of construction. The specified firefighting equipment will be provided to site personnel.

Special attention will be paid to operations involving open flames, such as welding, and use of flammable materials. Personnel involved in such operations will have appropriate training. A fire watch utilizing appropriately classed extinguishers or other equipment will be maintained during hot work operations. Site personnel will not be expected to fight fires past the incident stage. The local responding fire officials will be given information on the site hazards and the location of these hazards, and the information will be included in the emergency response plan.

Materials brought on site must conform to contract requirements, insofar as flame resistance or fireproof characteristics are concerned. Specific materials in this category include fuels, paints, solvents, plastic materials, lumber, paper, boxes, and crating materials. Specific attention will be given to compressed gas, fuel, solvent, and paint storage. Electrical wiring and equipment located in inside storage rooms used for Class I liquids will be stored in accordance with applicable regulations. Outside storage areas will be graded to divert possible spills away from buildings and will be kept clear of vegetation and other combustible materials. Precautions will be taken to protect storage areas against tampering where necessary.

On-site fire prevention during construction will consist of portable and fixed firefighting equipment. Portable firefighting equipment will consist of fire extinguishers and small hose lines in conformance with Cal-OSHA and the National Fire Protection Association (NFPA) for the potential types of fire from construction activities. Periodic fire prevention inspections will be conducted by the contractor's safety representative.

Fire extinguishers will be inspected routinely and replaced immediately if defective or in need of recharge. All firefighting equipment will be conspicuously located and marked with unobstructed access. A water supply of sufficient volume, duration, or pressure to operate the required firefighting equipment will be provided on-site. Designated, approved storage areas and containers for flammable materials shall be used with adequate fire control services.

**3.14.2.2 Plant Operational Safety Program**

The existing Larkspur Energy Facility maintains an Operational Health & Safety program for current operations at the facility. This program will be updated where appropriate and continue to be used during operation of the proposed Larkspur 3 Energy Facility.

The locations of potential worker hazards during the operational phase are listed in Table 3.14-3. Programs that address these hazards include:

- Regular employee education and training in safe work practices for general and particular task areas.

- Communication of hazards in accordance with federal and state standards.
- Accident and incident evaluations.
- Administrative safety procedures.
- Emergency response.
- Fire prevention and fire response.
- Security.
- Maintenance of safety performance data.
- All operations personnel are provided with written safety guidance.

#### 3.14.2.2.1 Operations Injury Illness Prevention Program (IIPP)

The existing Larkspur Energy Facility maintains an IIPP for current operations at the facility. This program will continue to be used during operation of the proposed Larkspur 3 Energy Facility

The IIPP is required by 8 CCR, Section 3203. The written IIPP contains the following information:

- Identity of the person(s) with authority and responsibility for implementing the program.
- A system for ensuring that employees comply with safe and healthy work practices.
- A system for communicating with employees in a readily understandable form.
- Procedures for identifying and evaluating workplace hazards including inspections to identify hazards and unsafe conditions.
- Methods for correcting unhealthy/unsafe conditions in a timely manner - when the hazard is discovered and/or when there is an imminent danger.
- A training program for:
  - Establishing the program initially.
  - New, transferred, or promoted employees.
  - New processes and equipment.
  - Supervisors.
- Methods of documenting inspections and training and maintaining records for 3 years.

**TABLE 3.14-3  
LOCATION OF POTENTIAL WORKER HAZARDS AT THE  
PROPOSED LARKSPUR 3 ENERGY FACILITY**

Location	Acid <sup>1</sup>	Flammable Material	Hazardous Material	High Voltage	Noise <sup>2</sup>	Pressure Vessel	Pressurized Gas Cylinders	Rotating Equipment	High Temperature
Control room	X			X					
Maintenance shop/ Warehouse		X	X		X			X	
CTG <sup>3</sup>	X	X	X	X	X	X		X	X
Switchyard			X	X					
Stack					X		X		

## Notes:

<sup>1</sup> Acid - Areas containing acids (sulfuric acid in batteries or sulfuric acid and hydrochloric acid for pH control)

<sup>2</sup> Noise - Area requiring noise protection

<sup>3</sup> CTG - combustion turbine generator

The IIPP designates a safety representative who is responsible for implementing the program. It also describes safety training for new employees and procedures for tracking safety training. The IIPP provides Job Hazard Assessments (JHAs) for each job. The JHA will identify safety hazards related to each work task and establish procedures for avoiding, correcting, reporting, and notifying employees of these hazards.

### 3.14.2.2.2 Operational Written Safety Programs

The IIPP is used in conjunction with other written safety programs. The existing Larkspur Energy Facility maintains written health and safety programs for current operations at the facility. These programs will continue to be used during operation of the proposed Larkspur 3 Energy Facility.

These programs include the following:

- Accident/Incident Reporting Procedures
- Blood-borne Pathogens Exposure Control Program
- Chemical Hygiene Plan
- Code of Safe Practices for Equipment and Operation
- Compressed Gas and Air Handling Systems
- Confined Space Entry Procedures
- Electrical Safety Procedures
- Emergency Action Plan
- Emergency Response Procedures
- Fall Protection Program
- Fire Protection and Prevention Plan
- Hand Tools and Equipment Guarding Safety Procedures
- Hazard Communication Plan (including Proposition 65 requirements)
- Hazardous Materials Handling Procedures

- Hazardous Waste Awareness Training
- Hearing Conservation Program
- Heat Stress/Cold Stress Prevention
- Heavy Equipment Procedures
- Hoist/Chain/Wire Rope/Webs/Rope Slings/Cranes
- Hot Work Program (Welding, Cutting, and Brazing)
- Industrial Hygiene Program
- Industrial Truck (Forklifts) Safety
- Ladders, Scaffolds, and Work Platforms
- Lock Out/Tag Out Procedure
- Motor Vehicle Safety
- PPE Program
- Portable Electric and Pneumatic Tools
- Preventing Slips, Trips, and Falls
- Repetitive Stress Injuries/Ergonomics/Lifting Hazards
- Respiratory Protection Program
- Safety and Housekeeping Inspection Program
- Safety Committee and Toolbox/Tailgate Safety Meetings
- Security Program
- Stop Work Authority
- Signs, Tags, and Barricades
- Tools, Power- and Hand-operated

These programs are reviewed annually to determine if they are affected by any new regulations and to determine the effectiveness of their implementation. Other written programs or plans may relate to worker safety in that they enable work to be performed in a safe manner. These include standard operating procedures, worker qualifications programs, and site security.

#### 3.14.2.2.3 Operations Safety Training Programs

The existing Larkspur Energy Facility maintains safety training programs for current operations at the facility. These programs will continue to be used during operation of the proposed Larkspur 3 Energy Facility.

All existing Larkspur Energy Facility workers are given instructions regarding their responsibility for safe conduct of their work. These instructions are given in part at the time the employee is first hired and as an ongoing training program of hazard recognition and avoidance.

Workers are instructed in the safety regulations pertinent to their employment tasks. Safe working conditions, work practices, and protective equipment requirements is communicated in the following manner:

- New, promoted, or transferred employees receive safety training orientation.
- Weekly safety meetings are held with employees.
- Toolbox/tailgate safety meetings are conducted periodically for each crew. General safety topics and specific hazards that may be encountered will be discussed. Comments and suggestions from all employees will be encouraged.
- Regularly scheduled safety meetings are held for supervisors.

- Hazard communication training, including California Proposition 65 warnings and discharge prohibitions, are conducted as new hazardous materials are introduced to the workplace.
- MSDSs are available for all appropriate chemicals.
- A bulletin board with required postings and other information is to be maintained at the plant site.
- Warning signs are posted in hazardous areas.

Safety training is provided to each new employee as described below:

- A list of safe work rules for the existing Larkspur Energy Facility is explained to each new employee.
- A copy of the applicable Safe Work Practices will be given to each new employee. The provisions are incorporated into training for the qualifications programs so that employees may fully understand what the protective provisions mean.
- The Hazard Communication Program and other applicable training and requirements for personal protection for the types of hazards that may be encountered at the site are explained to employees. This training is documented.
- Unusual hazards that are found on site are explained in detail to each new employee, including any specific requirements for personal protection.
- Safety requirements for the new employee's specific job assignment are explained by the foreman upon initial assignment and upon any reassignment.

#### 3.14.2.2.4 Operations Personal Protective Equipment Program

The existing Larkspur Energy Facility maintains a PPE program for current operations at the facility. This program will continue to be used during operation of the proposed Larkspur 3 Energy Facility.

Personal protective clothing and equipment are used during specified work operations. Each employee is provided the following information pertaining to the protective clothing and equipment:

- Proper use and maintenance.
- When the protective clothing and equipment are to be used.
- Benefits and limitations.
- When and how the protective clothing and equipment are to be replaced.
- Each employee is checked for proper fit and to see if they are medically capable of wearing the equipment.

All safety equipment meets NIOSH or ANSI standards and has all required markings, numbers, or certificates of approval. Table 3.14-2, Basic Protective Equipment Guide, contains a list of the basic protective equipment that is used at the existing Larkspur Energy Facility.

### 3.14.2.2.5 Hazardous Materials Handling and Storage

The existing Larkspur Energy Facility maintains a hazardous materials handling and storage program for current operations at the facility. This program will continue to be used during operation of the proposed Larkspur 3 Energy Facility.

Various hazardous materials will be stored and used during construction and operation of the Project. The storage, handling, and use of all chemicals will follow all applicable LORS to minimize risks to workers. All hazardous materials will be appropriately labeled and stored in hazardous materials storage facilities. Bulk hazardous materials will be stored in aboveground storage tanks. Other hazardous materials will be stored in their delivery containers. Hazardous materials storage and chemical feed areas at the existing Larkspur Energy Facility are surrounded by containment or curbing to contain leaks and spills. The containment areas are sized to hold an appropriate volume (considering the potential for the local hazard contingencies) as designated by a California registered Professional Engineer. At a minimum, this volume equals the full contents of the largest single tank plus sufficient capacity for precipitation from a 25-year, 24-hour storm event in the case of outdoor storage tanks. A RMP has been developed and implemented for the storage and use of aqueous ammonia on site. The RMP describes specific safety requirements, procedures, and training to protect workers from exposure to ammonia.

Safety showers and eyewash stations are provided in or adjacent to corrosive chemical storage areas in accordance with regulatory requirements. The PPE and spill response equipment for the exposure and cleanup is readily available for plant personnel for use during spill containment and cleanup activities. A hazardous material emergency response team, trained in the handling of these emergencies and accidental releases of hazardous materials, is available to the existing Larkspur Energy Facility through contract. Emergency contact numbers are available for spill response contractors and for notification to local agencies of spill incidents. These and other procedures are detailed in the Larkspur Energy Facility Emergency Action Plan.

### 3.14.2.2.6 Operations Emergency Action Plan/Emergency Response Plan

The existing Larkspur Energy Facility maintains an Emergency Action Plan/Emergency Response Plan for current operations at the facility. This plan will be updated and continue to be used during operation of the proposed Larkspur 3 Energy Facility.

In addition to the incorporation of various safety and environmental features and design measures to minimize emergencies and their effects on public and worker safety, the existing Larkspur Energy Facility has developed a site-specific Emergency Action Plan/Emergency Response Plan. The Emergency Action Plan/Emergency Response Plan is designed to address potential emergencies, including hazardous materials releases, fires, bomb threats, pressure vessel ruptures, and other catastrophic events. It describes evacuation routes, warning devices, points of contact, assembly areas, responsibilities, and other actions to be taken in the event of an emergency. The plan has a layout map and a fire extinguisher list, and describes arrangements with local emergency response agencies for responding to emergencies.

### 3.14.2.2.7 Fire Protection and Prevention Plan

The existing Larkspur Energy Facility maintains a Fire Protection and Prevention Plan for current operations at the facility. This plan will be updated and will continue to be used during operation of the proposed Larkspur 3 Energy Facility.

Fire protection at the existing Larkspur Energy Facility includes measures relating to safeguarding human life, preventing personnel injury, preservation of property, and minimizing downtime due to fire or explosion. Fire protection measures include fire prevention measures to prevent the inception of fires. Of concern are adequate exits, fire-safe construction, reduction of ignition sources, and control of fuel sources.

The Fire Protection and Prevention Plan provides for fire protection practices including routine inspections of the facility by the designated safety representative. It requires prompt action to correct situations deemed to be a fire hazard and it identifies firefighting equipment and systems at the facility as well as methods to safely store flammable and combustible materials. The existing Larkspur Energy Facility has been designed by a California Registered Fire Protection Engineer and fire protection equipment is installed and maintained in accordance with all applicable NFPA standards and recommendations (NFPA 1994).

The comprehensive on-site fire protection system and procedures have been designed and implemented to protect both personnel and property. A Program Fire Protection Station Order has been developed to address:

- Names and/or job titles responsible for maintaining equipment and accumulation of flammable or combustible material control.
- Procedures in the event of fire.
- Fire alarm and protection equipment.
- System and equipment maintenance.
- Monthly inspections.
- Annual inspections.
- Housekeeping practices.
- Training.

### 3.14.2.2.8 Fire Suppression

The existing Larkspur Energy Facility maintains a fire suppression system for current operations at the facility. This fire suppression system will be expanded to include the features for the Larkspur 3 Energy Facility.

The following fire suppression systems are currently in place at the existing Larkspur Energy Facility:

#### 3.14.2.2.8.1 Facility Fire Extinguishers

Fire extinguishers are the normal fire protection system for the balance of the existing facility. There are currently 16 fire extinguishers and each one is a 20# ABC dry chemical extinguisher and is located strategically throughout the facility.

#### 3.14.2.2.8.2 Turbine/Generator Fire Protection

The turbine/generator fire protection system consists of compressed CO<sub>2</sub> bottles in series that supply “flooding” CO<sub>2</sub> to the turbine/generator compartments in the event of a fire. There is also a back up CO<sub>2</sub> bank. The CO<sub>2</sub> fire protection system has monitoring probes in each of the turbine and generator compartments, (gas detectors, temperature sensors, and flame detectors). To initiate the CO<sub>2</sub> fire protection system, two of the detector systems have to have been initiated. The turbine/generator CO<sub>2</sub> fire protection system can be isolated to work within the compartments, but is active whenever the unit is available. This system can be manually initiated from three external push buttons outside of the turbine/generator compartments.

#### 3.14.2.2.8.3 Fire Protection

The Photochemical Reaction (PCR) fire protection system is a single bank of compressed dry chemical, (Inergen) cylinders that are initiated by heat/smoke sensors located in the main control room and battery room. To initiate the PCR fire protection system, two of the detector systems have to have been initiated. The PCR fire protection system is in service at all times. An alarm in the control will activate when the fire system is initiated.

#### 3.14.2.2.8.4 Emergency Fire Protection Systems

There are three emergency fire protection systems for the existing Larkspur Energy Facility. The first is an access fire connection for the local fire department. This fire hydrant is located outside the plant at the west main gate entrance. This connection is a normal city fed fire hydrant with connections for the fire department to use in the event they are called.

The second emergency fire protection system is a “Foamite” station located within the west perimeter fence line at the ammonia storage tank. This Foamite system is only used for the diesel storage tank and has city water pressure to a tank filled with Foamite. This system is used as a precautionary way to flood the diesel tank and containment in the event of a fire.

The third emergency fire protection system is a 2-inch (100-foot long) fire hose located on the cooling tower fill line. This system is fed from the City water 2 inch connection and is pressurized by a 90 psi chiller recirculation pump.

On-site fire suppression systems at the existing Larkspur Energy Facility and for the Project will be backed up by fire suppression support from the City of San Diego Fire Department. Both fire and emergency service will be provided from the Otay Mesa Fire Station No. 43, located at 1590 La Media Road, at the intersection of Otay Mesa Road and La Media Road, approximately 0.5 mile from the existing Larkspur Energy Facility.

### 3.14.3 Mitigation Measures

Additional environmental consequences related to worker safety are not anticipated; therefore, additional measures beyond those herein are not considered necessary. No significant unavoidable adverse impacts to worker safety are anticipated from the Project.

### 3.14.4 Consistency with LORS

Construction and operation of the Project will be in accordance with all applicable LORS pertaining to worker safety.

The following LORS are applicable or potentially applicable to the Project in the context of occupational safety and health protection measures addressed in this section. LORS applicable to worker safety are summarized in Table 3.14-4, provided below.

**TABLE 3.14-4  
LORS APPLICABLE TO WORKER SAFETY**

LORS	Applicability
<b>Federal</b>	
Occupational Health & Safety Act of 1970 (OSHA), 29 USC 651 et seq.; 29 CFR 1910 et seq.; and 29 CFR 1926 et seq.	Meet employee health and safety standards for general industry and the construction industry.
Department of Labor, Safety and Health Regulations for Construction Promulgated Under Section 333 of the Contract Work Hours and Safety Standards Act, 40 USC 327 et seq.	Meet employee health and safety standards for construction activities. Requirements addressed by CCR Title 8, General Construction Safety Orders.
National Fire Protection Association	Meet standards necessary to establish a reasonable level of safety and property protection from the hazards created by fire and explosion.
<b>State</b>	
California Code of Regulations, Title 8	Meet requirements for a safe and hazard-free working environment. Categories of requirements include General Industry Safety Orders, General Construction Safety Orders, Electrical Safety Orders.
California Clean Air Act, California Health & Safety Code 39650 <i>et seq.</i>	Meet requirements for best available control technology to minimize exposure limits to toxic air pollutants and possible risk assessments for carcinogen pollutants.
California Public Resources §25523(a); 20 CCR §1752, 1752.5, 2300.2309, and Division 2, Chapter 5, Article 1, Appendix B, Part (I), CEC	Protect environmental quality and assure public health.

**TABLE 3.14-4**  
**LORS APPLICABLE TO WORKER SAFETY**  
**(Continued)**

LORS	Applicability
California Health and Safety Code §25500 to 25541; 19 CCR §§2720-2734	Estimate emissions for listed air toxic pollutants and submit inventory to air district for major sources of criteria air pollutants. Follow-up from air district may require a health risk assessment.
Local	
San Diego County Zoning Ordinance	Provide safety setbacks as required.
The County of San Diego Department of Environmental Health (DEH), Hazardous Materials Division (HMD)	Provide implementation of the Hazardous Materials Business Plan and Risk Management Plan.

Notes:

CCR = California Code of Regulations

CEC = California Energy Commission

CFR = Code of Federal Regulations

USC = United States Code

### 3.14.4.1 Federal

#### *Occupational Safety and Health Act of 1970 (OSHA), 29 USC §651 et seq.; 29 CFR §§1910 et seq.; and 29 CFR §1926 et seq.*

The authority establishes occupational safety and health standards (§1910) i.e., permissible exposure limits for toxic air contaminants (§1910.100), electrical protective equipment requirements (§1910.137), electrical workers safety standards (§1910.269), and the requirement that information concerning the hazards associated with the use of all chemicals is transmitted from employers to employees (§1910.1200)] and safety and health regulations for construction (§1926). Subpart I of §1910 and Subpart E of §1926 address personal protective equipment.

Under the Operational Status Agreement of October 5, 1989 between the federal OSHA and the California Department of Industrial Relations, Division of Occupational Safety and Health (DOSH), the state resumed full enforcement responsibility for most of the relevant federal standards and regulations, (55 Fed. Reg. 18610 [July 12, 1990]; 29 CFR §1952.172). Federal OSHA has retained concurrent enforcement jurisdiction with respect to certain federal standards including standards relating to hazardous materials at 29 CFR §1910.120 (Id.).

The administering agencies for the above authority are OSHA and DOSH (or Cal-OSHA).

*Department of Labor, Safety and Health Regulations for Construction Promulgated Under §333 of the Contract Work Hours and Safety Standards Act, 40 USC 327 et seq.*

The code establishes safety and health regulations for construction. The requirements for this regulation are all addressed in Title 8 CCR, Chapter 4, Subchapter 4, General Construction Safety Orders.

The administering agencies for the above authority are OSHA and DOSH (or Cal-OSHA).

*Uniform Fire Code, Article 80*

The article includes provisions for storage and handling of hazardous materials. Considerable overlap exists between this code and Chapter 6.95 of the Health and Safety Code. However, the fire code does contain independent provisions regarding fire protection and neutralization systems for emergency venting (§80.303, D, Compressed Gases). Other articles that may be applicable include Article 4, Permits, and Article 79, Flammable and Combustible Liquids.

The administering agency for the above authority is the City of San Diego Fire Department.

*National Fire Protection Association*

The NFPA prescribes minimum requirements necessary to establish a reasonable level of fire safety and property protection from the hazards created by fire and explosion. The standards apply to the manufacture, testing, and maintenance of the equipment.

The administering agency for the above authority is the City of San Diego Fire Department.

**3.14.4.2 State**

*California Code of Regulations Title 8*

These authorities prescribe general occupational safety and health regulations and standards in addition to the construction and industrial safety regulations, standards, and orders. The Project complies with applicable sections of 8 CCR, Chapter 4, Subchapter 7 and 24 CCR. Topics of concern are provided in 8 CCR §1509 (Construction) and §3203 (General Industry) make numerous changes designed to redirect the emphasis of Cal-OSHA toward ensuring that employers have an effective work site IIPP to focus Cal-OSHA discretionary inspections in the highest hazard industries as determined by worker compensation and other occupational injury data, and to limit the number of follow-up inspections which Cal-OSHA must perform. The CCR, Title 8, Section 5189, requires facility owners to develop and implement effective Safety Management Plans to ensure that large quantities of hazardous materials are handled safely. Although such requirements primarily provide for the protection of workers, they also indirectly improve public safety and are coordinated with the RMP process.

*California Health and Safety Code, Section 25500*

This code requires companies that handle hazardous materials in sufficient quantities to develop a HMBP. The HMBP includes the basic information on the location, type, quantity, and health risks of hazardous

materials handled, stored, used, or disposed of that could be accidentally released into the environment. It also includes a plan for training new personnel, and for annual training of all personnel in safety procedures to follow in the event of a release of hazardous materials. It also includes an emergency response plan and identifies the business representative able to assist emergency personnel in the event of a release.

The California Health and Safety Code, Section 25531, directs facility owners storing or handling acutely hazardous materials in reportable quantities to develop an RMP and submit it to appropriate local authorities, the EPA, and the designated local administering agency for review and approval. The RMP includes: an evaluation of the potential impacts associated with an accidental release; the likelihood of an accidental release occurring, the magnitude of potential human exposure; any pre-existing evaluations or studies of the material; the likelihood of the substance being handled in the manner indicated, and the accident history of the material. This new, recently developed program supersedes the California Risk Management and Prevention Plan and is known as the California Accidental Release Program. The existing Larkspur Energy Facility has developed, and implemented an RMP and maintains an RMP for current operations at the facility. This RMP will be updated as necessary and will continue to be used during operation of the proposed Larkspur 3 Energy Facility.

#### **3.14.4.3 Local**

##### ***The County of San Diego Department of Environmental Health, Hazardous Materials Division***

The County of San Diego Department of Environmental Health, Hazardous Materials Division provides for the implementation of the HMBP and RMP.

#### **3.14.5 References Cited**

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National Institute for Occupational Safety and Health. 1978. Health Hazard Evaluation Report, U.S. Army Corps of Engineers, Ozark Power Plant, Ozark, Kansas.

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Wildflower Energy, Application for Certification Pursuant to the 21-Day Emergency Permitting Process  
Larkspur Energy Facility San Diego, California, March 7, 2001.

### 3.14.6 Conditions of Certification

This Amendment does not require changes to the 2001 AFC Worker Safety Conditions of Certification.