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5.17 WORKER SAFETY

This section addresses worker health and safety issues and describes or outlines the systems and procedures that Watson Cogeneration Company (Applicant) will implement to provide occupational safety and health protection for workers on the Watson Cogeneration Steam and Electric Reliability Project (Project). These systems and procedures will be implemented in accordance with all applicable worker health and safety laws, ordinances, regulations, and standards (LORS). All applicable elements of Title 8 California Code of Regulations, General Industry Safety Orders, Construction Safety Orders, and Electrical Safety Orders, are addressed in this section. Section 5.17.1, Affected Environment, 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 Project construction and operation is presented in Section 5.17.2, Environmental Consequences. Section 5.17.3 describes Cumulative Impacts. Mitigation measures are discussed in Section 5.17.4, Mitigation Measures. Section 5.17.5, Applicable Laws, Ordinances, Regulations, and Standards, addresses compliance with LORS.

5.17.1 Affected Environment

The Project Site is a 2.5-acre brown field site located within the boundary of the existing Watson Cogeneration Facility, which is a 21.7-acre area within the 428-acre parcel further described as Assessors Parcel Number (APN) 7315-006-003, 1801 Sepulveda Boulevard, Carson, California, 90745 and is integral to BP's existing Carson Refinery (BP Refinery). The street address of the Project Site is located within the boundary of the existing Watson Cogeneration Facility at 22850 South Wilmington Avenue, Carson, California. Figure 3-1, Regional Map, depicts the Project Site and surrounding area. An existing warehouse/maintenance shop on a portion of the site will be removed as part of the Project. A new warehouse/shop will be constructed at an alternate location on refinery property. The Project Site is located approximately 0.7 mile south of the 405 Freeway, roughly bounded by Wilmington Avenue to the west, East Sepulveda Boulevard to the south, and South Alameda Street to the east.

The Project Site elevation is approximately 32 feet above mean sea level. Because the site is located within the existing refinery property boundary, the Project Site and surrounding areas are highly developed, and have been subject to disturbance for many years.

The Project's primary objective is to provide additional process steam in response to the refinery's process steam demand. The Project complements the existing cogeneration facility located within the confines of the refinery. The existing facility has four GE 7EA combustion turbine generators (CTGs), four heat recovery steam generators (HRSGs), and two steam turbine generators. The Project consists of adding a fifth CTG/HRSG to the existing configuration and is referred to as the "fifth train."

The Construction Laydown and Parking Area is a paved 25-acre parcel located approximately 1 mile southeast of the Project Site, at the northeast corner of East Sepulveda Boulevard and South Alameda Street. The area is owned by BP and is currently used as a truck parking and staging area.

No off-site improvements associated with the Project, such as water supply, natural gas or wastewater pipelines, are currently planned for the Project. The Project will connect to the existing supply pipelines currently located at the facility.

The Applicant will take safety precautions and implement emergency systems as part of the design and construction of the Project and to ensure safe and reliable Project operation. The design of the Watson Cogeneration Facility includes—and the design of the Project will include—controls and monitoring systems to minimize the potential for upset conditions that could result in public exposure to acutely hazardous materials.

The Applicant will implement the existing programs for the Watson Cogeneration Facility for the Project to ensure and maintain compliance with federal and state occupational safety and health program requirements. These programs will protect both worker health and safety and public health and safety.

The Project will use the existing perimeter fence for the Watson Cogeneration Facility, and site access will remain unchanged. Temporary security fencing between the cogeneration facility and the refinery will be installed. Security will be maintained on a 24-hour basis with either surveillance devices or security personnel. No additional security systems or features will be required for the Project.

5.17.2 Environmental Consequences

Construction, operation, and maintenance activities may expose workers to the hazards identified in Table 5.17-1, Potential Worker Hazards During Project Construction, and Table 5.17-3, Potential Worker Hazards During Project Operation and Maintenance. Exposure to these hazards can be minimized through adherence to appropriate engineering design criteria and administrative controls, use of applicable personal protective equipment (PPE), and compliance with all applicable health and safety LORS. The programs, regulations, and preventive measures intended to control the potential worker health and safety effects associated with these hazards are described throughout this section. This section also describes 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 5.17-1
Potential Worker Hazards During Project Construction**

Activity	Potential Hazard
Elevated work	Slips/trips/falls.
Hot work (welding/cutting)	Flash burns, explosion, thermal burns, toxic welding fumes.
Excavations	Excavation/trench wall collapse, spoil 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- motor vehicle and heavy equipment use	Noise exposure, vehicle accidents, load hazards, induced current.
Transmission lines/ transformer station (working on electrical equipment and systems)	Slips/trips/falls, contact with live electricity and energized equipment, electrocution, flash burns.

**Table 5.17-1
Potential Worker Hazards During Project Construction**

Activity	Potential Hazard
Painting	Paint solvents, paint vapors, chemical burns, fire/explosion, and slips/trips/falls.
Abrasive blasting	Dust, flying particles, pressure vessels, noise.
Powered hand tools	Noise, dust, flying particles, cuts, amputation, crushing.
Fueling and working with flammable and combustible liquids	Fire, explosion, spills, environmental contamination.
Construction and testing of high-pressure steam and air systems	Injury from failure of pressurized system components or unexpected pressure release
General construction activities	Heat and cold stress, biological hazards, noise exposure, dust exposure, injury to head, eyes, face, body, foot, and skin, ergonomic injuries, exposure to hazardous materials

Source: California Department of Industrial Relations 2008 [2008a, 2008b].

5.17.2.1 Construction Health and Safety Program

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

Injury and Illness Prevention Program for Project Construction

The Construction Health and Safety Program will meet the California Division of Occupational Safety and Health (Cal/OSHA) Injury and Illness Prevention (IIPP) requirements. The IIPP requirements are listed below.

- A written Code of Safe Practices that relates to construction activities.
- 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 that includes inspections.
- A system of ensuring employee and subcontractor compliance.
- “Toolbox” or “tailgate” meetings that supervisors conduct 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 instruction regarding the hazards and safety precautions applicable to the type of work in question; workers will also be 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.

Written Health and Safety Programs for Project Construction

Written safety programs that will be implemented in conjunction with the Code of Safe Practices are listed below.

- Accident/incident reporting procedures
- Blood-Borne Pathogens Exposure Control Program
- Procedures for use of compressed gas and air handling systems
- Confined-space entry procedures
- Contractor Safety Program
- Electrical safety procedures
- Emergency Action Plan/Emergency Response Plan
- Emergency response procedures
- Excavation, Trenching, and Shoring Program
- Fall Protection Program
- Fire Protection and Prevention Plan
- First Aid / Cardiopulmonary Resuscitation / Automated External Defibrillator (AED) Program
- 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 (forklift) safety
- Ladders, scaffolds, and work platforms

- Lockout/Tag-out Program
- Motor vehicle safety
- PPE Program
- Portable electric and pneumatic tools
- Preventing slips, trips, and falls
- Process Safety Management (BP Refinery Process Safety and Risk Management Department)
- 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

PPE Program for Project Construction

Employees will be instructed to use the required PPE during construction activities. Required PPE will be approved for use, 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 5.17-2, Basic Protective Equipment Guide, and will comply with Cal/OSHA requirements. When protective-insulating equipment is used, it will comply with the electrical safety codes.

**Table 5.17-2
Basic Protective Equipment Guide**

Body Area	Hazards	Recommended Protection
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.	Splash proof goggles and face shield.
	Welding: injurious light rays.	Welding hood with appropriate eye filter lenses.
Head/ears	General wear, overhead rigging, material handling, maintenance, and general construction processes.	Hardhat.
	High noise level.	Earplugs or muff.

**Table 5.17-2
Basic Protective Equipment Guide**

Body Area	Hazards	Recommended Protection
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.	Airline 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 object handling.	Safety-toe shoes
	Handling heavy objects.	Metatarsal safety shoes.
	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.
	Fire or Explosion	Full body suit made of NOMEX.
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.

Source: California Department of Industrial Relations 2008 [2008a, 2008b].

A Respiratory Protection Program that complies with Title 8 California Code of Regulations (CCR) Section 5144 and General Industry Safety Order requirements will be developed, including respirator training, fit testing, monitoring, selection, etc.

Fire Protection and Prevention Plan for Project Construction

During Project construction, the Applicant or general contractor will rely on both on-site fire protection systems and local fire protection services. These systems will be coordinated with the existing fire protection and prevention systems and procedures. The permanent fire protection systems for the Project Site are described in Section 3.4.11, Fire Protection System.

A Fire Protection and Prevention Plan will be developed and followed throughout Project construction. The specified firefighting equipment will be provided to Project personnel.

Construction fire regulations at Title 8 CCR Section 1620 *et seq.* will be followed as necessary to prevent construction fires and include applicable local fire requirements listed below.

- 1998 edition of California Fire Code and all applicable National Fire Protection Association (NFPA) standards (Title 24 CCR Part 9).
- Uniform Fire Code standards.
- California Building Code Title 24 CCR Section 3 *et seq.*

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. Local fire officials will be given information on the Project Site hazards and the location of these hazards, and this information will be included in the emergency response planning.

Materials brought on-site must conform to contract requirements for flame resistance or fireproof characteristics. Specific materials in this category include fuels, paints, solvents, plastic materials, lumber, paper, boxes, and crating materials. Specific attention will be given to storage of compressed gas, fuels, solvents, and paint. 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 NFPA guidelines for potential types of fires from construction activities. Periodic fire prevention inspections will be conducted by the construction 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 to maintain unobstructed access. A water supply of sufficient volume, duration, or pressure to operate the required firefighting equipment will be provided on-site. Adequate fire control services will be maintained for authorized storage areas and containers for flammable materials.

5.17.2.2 Operation Health and Safety Program

The existing facility maintains an Operation Health and Safety Program for the current operation of the facility. This program will be updated where appropriate and will continue to be used during operation of the Project. The Project will be incorporated into the existing program.

The potential worker hazards during Project operation are listed in Table 5.17-3, Potential Worker Hazards During Project Operation and Maintenance.

**Table 5.17-3
Potential Worker Hazards During Project Operation and Maintenance**

Activity	Potential Hazard
Generation enclosure	High voltage.
Operations building	High voltage, repetitive trauma.
Transformer	Electrocution, flash burns.
Compressor	Fire, noise, temperature, rotating equipment, pressure.
Chemical storage	Chemical splashes, burns, reactions, gases, vapors, fumes, injury due to ingestion, inhalation, or dermal contact.
Machinery, general	Noise, temperature extremes, rotating equipment, electrocution.
Elevated work	Slips/trips/falls.
Hot work (welding/cutting)	Flash burns, explosion, thermal burns, toxic welding fumes.

**Table 5.17-3
Potential Worker Hazards During Project Operation and Maintenance**

Activity	Potential Hazard
Equipment operation (motor vehicle and heavy equipment use)	Noise exposure, vehicle accidents, load hazards, induced current.
Fueling and working with flammable and combustible liquids	Fire, explosion, spills, environmental contamination.
Transmission lines/ transformer station - working on electrical equipment and systems	Slips/trips/falls, contact with live electricity and energized equipment, electrocution, flash burns.
Maintenance of high-pressure steam and air systems	Injury from failure of pressurized system components or unexpected pressure release
General project operation activities	Heat and cold stress, biological hazards, noise exposure, dust exposure, injury to head, eyes/face, body, foot, and skin, ergonomic injuries, exposure to hazardous materials

Source: California Department of Industrial Relations 2008[2008a, 2008b].

Listed below are programs that address these hazards.

- 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 operation personnel will be provided with written safety guidance.

Injury and Illness Prevention Program for Project Operation

The existing facility maintains an IIPP for the current operation of the facility. This program will be used during operation of the Project, and the Project will be incorporated into the existing IIPP.

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

- 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 from the time of the inspection or training.
- Providing all Project operation personnel with written safety guidance.

The IIPP designates a safety representative, who is responsible for implementing the program. The IIPP also describes safety training for new employees and procedures for tracking safety training. In addition, the IIPP provides Job Hazard Analyses. The Job Hazard Analyses will identify the safety hazards related to each Project work task and establish procedures for avoiding, correcting, reporting, and notifying employees of these hazards.

Written Health and Safety Programs for Project Operation

The current IIPP is used in conjunction with other written safety programs. The existing facility maintains written health and safety programs for current operation of the facility. These programs will be used during operation of the Project, and the Project will be incorporated into these programs.

These programs are listed below.

- Accident/incident reporting procedures
- Blood-Borne Pathogens Exposure Control Program
- Chemical Hygiene Plan
- Code of Safe Practices for Equipment and Operation
- Procedures for compressed gas and air handling systems
- Confined space entry procedures
- Electrical safety procedures
- Emergency Action Plan/Emergency Response Plan
- Emergency response procedures
- Fall Protection Program
- Fire Protection and Prevention Plan

- First Aid/Cardiopulmonary Resuscitation/ Automated External Defibrillator Program
- 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 (forklift) safety
- Ladders, scaffolds, and work platforms
- Lockout/Tag-out Program
- Motor vehicle safety
- PPE Program
- Portable electric and pneumatic tools
- Preventing slips, trips, and falls
- Process Safety Management (BP Refinery Process Safety and Risk Management Department)
- 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 and procedures will be 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 programs include standard operating procedures, worker qualification programs, and site security.

Safety Training Programs for Project Operation

The existing facility maintains safety training programs for the current operation of the facility. These programs will be used during operation of the Project, and the Project will be incorporated into these programs.

All existing facility workers are given instructions regarding their responsibility for the safe conduct of their work. These instructions are given in part at the time the employee is first hired and in part 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 are communicated in the list below.

- 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 are discussed. Comments and suggestions from all employees are 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.
- Material Safety Data Sheets are available for all appropriate chemicals.
- A bulletin board with required postings and other information is maintained on-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 facility is explained to each new employee.
- A copy of the applicable Safe Work Practices is given to each new employee.
- The Hazard Communication Plan and other applicable training and requirements for personal protection for the types of hazards that may be encountered at the Project Site are explained to employees. This training is documented.
- Unusual hazards found on-site, including any specific requirements for personal protection, are explained in detail to each new employee.
- Safety requirements for each new employee's specific job assignment are explained by supervisors on initial assignment and on any reassignment.

PPE Program for Project Operation

The existing facility maintains a PPE program for the current operation of the facility. This program will be used during operation of the Project, and the Project will be incorporated into this program.

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.

Also, each employee is checked for proper fit and to see if he or she is medically capable of wearing the equipment,

All safety equipment meets National Institute for Occupational Safety and Health or American National Standards Institute standards and has all required markings, numbers, or certificates of approval. Table 5.17-2, Basic Protective Equipment Guide, contains a list of the basic protective equipment that may be used at the Project Site.

Hazardous Materials Handling and Storage for Project Operation

The existing facility maintains a Hazardous Materials Handling and Storage Program for current operations at the facility. This program will continue to be used, and the Project will be incorporated into this program. The program will be updated as necessary during operation of the Project.

Various hazardous materials will be stored and used during Project operation. 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. The existing hazardous materials storage and dispensing systems, which are in accordance with applicable LORS will be used for the Project. The hazardous materials storage and chemical feed areas at the existing Watson Cogeneration Facility are surrounded by containment or curbing to contain leaks and spills. The containment areas are sized to hold appropriate volumes (considering the potential for the local hazard contingencies), as designated by a California-registered Professional Engineer. At a minimum, these volumes equal 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 Hazardous Materials Business Plan (HMBP) has been developed and implemented for the storage and use of hazardous materials on-site. A Risk Management Plan (RMP) has been developed and implemented for the storage and use of anhydrous ammonia on-site. The RMP describes specific safety requirements, procedures, and training to protect workers from exposure to or release of ammonia.

Safety showers and eyewash stations will be provided in or adjacent to corrosive chemical storage areas and in required areas in accordance with regulatory requirements. The PPE and spill response equipment for the exposure and cleanup will be readily available for Project personnel for use during spill containment and cleanup activities. A hazardous material emergency response team that is trained in the handling of emergencies and accidental releases of hazardous materials will be available to the Project through contract. Emergency contact

numbers will be available for spill response contractors and to notify local agencies of spill incidents. These and other procedures are detailed in the Emergency Action Plan for the Watson Cogeneration Facility.

Emergency Action Plan/Emergency Response Plan for Project Operation

Besides having various safety and environmental features and design measures to minimize emergencies and their effects on the public and worker safety, the Project will be incorporated into the Watson Cogeneration Facility site-specific Emergency Action Plan/Emergency Response Plan. The plan will address potential emergencies, including chemical releases, fires, and injuries, and will describe emergency response equipment and its location, evacuation routes, procedures for reporting to local emergency response agencies, responsibilities for emergency response, and other actions to take in the event of an emergency.

Employee response to an emergency will be limited to an immediate response to minimize the risk of escalation of an accident or injury. Employees will be trained to respond to fires, spills, earthquakes, and injuries. The Project will have an on-site first-aid facility with adequate first-aid supplies, and personnel qualified in first-aid treatment will be available.

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. This plan describes evacuation routes, warning devices, points of contact, assembly areas, responsibilities, and other actions to take 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.

Fire Protection and Prevention Plan for Project Operation

Fire protection at the Project will include measures to safeguard human life, prevent injury to personnel, preserve property, and minimize downtime due to fire or explosion (National Safety Council 1992). Fire protection also involves physical arrangements, such as sprinkler systems, water supplies, and fire extinguishers. Fire protection measures include fire prevention measures to prevent the inception of fires. Topics of concern include 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 Project by the designated safety representative. The plan requires prompt action to correct situations deemed to be a fire hazard, and it identifies firefighting equipment and systems at the Project Site as well as methods to safely store flammable and combustible materials. The Project facilities have been designed by a California-registered Professional Engineer, and fire protection equipment is installed and maintained in accordance with all applicable NFPA standards and recommendations (NFPA 1994). A fire reporting protocol (depending on the size of the fire) and an investigation protocol are detailed in the Fire Protection and Prevention Plan.

A comprehensive on-site fire protection system is in use at the Watson Cogeneration Facility, and the fire protection procedures are currently designed and implemented to protect both personnel and property. The Fire Prevention and Protection Plan will be updated to incorporate the Project and to address the following listed below.

- 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.
- Firefighting demonstrations.
- Housekeeping practices.
- Training.

Fire Suppression for Project Operation

The Project will have on-site fire protection systems and will be supported by local fire protection services. These systems will be coordinated with the existing procedures.

Fire Prevention and Protection Program includes both fire prevention and protection measures. Employment of conservative equipment layouts, segregation of critical components, and the remote location of non-essential resources are the backbone of the fire mitigation/suppression measures employed.

A new fire water loop will be installed around the CTG and HRSG and tied into the existing fire protection system. An underground firewater ring header with hydrants will be installed around the periphery of the Project Site, as shown on Figure 3-14, Fire Protection System. The ring header will be manifolded into the existing firewater loop at two locations. The fire water system will be designed in accordance with NFPA 850, and will provide sufficient flow to meet NFPA codes for firewater demands. No new firewater pumps, either diesel or electric, will be required.

A carbon dioxide (CO₂) fire protection system will protect certain turbine, generator, and accessory equipment compartments from fires. The system will have fire detection sensors in all compartments. Actuating one sensor will provide a high temperature alarm on the combustion turbine control panel. Actuating a second sensor will trip the combustion turbine, turn off ventilation, close ventilation openings, and automatically release the CO₂. The CO₂ will be discharged at a design concentration adequate to extinguish the fire. Portable fire extinguishers will be provided at locations within the Project boundary as required by NFPA 850.

Fixed fire protection and deluge systems will be provided for the GSU transformer, the auxiliary transformer, the CTG lube oil system, and the HRSG duct burner skid. Sprinkler and fixed-spray systems will be designed and installed in accordance with NFPA 13 and NFPA 15.

All fire detection systems associated with the Project will be connected to the existing fire alarm control panel in the existing control room, and in accordance with NFPA 72 and local fire codes. The alarm system will include alarm annunciation, supervisory, and trouble signals. Alarms will require urgent action by the facility operators. Supervisory signals indicate abnormal conditions

that require investigation. Trouble signals indicate adverse conditions such as ground fault or power supply problem that should be rectified by qualified personnel.

Hand-held CO₂ and dry chemical fire extinguishers will be located as required, in accordance to NFPA 10.

All material used in construction of the facility and its auxiliary systems will be free of asbestos and will meet the fire and smoke rating requirements of NFPA 255.

The Project on-site fire suppression systems will be backed up by fire suppression support from the Los Angeles County Fire Department (LACOFD 2008a, 2008b), fire station number 127, which is located at 2049 East 223rd Street, Carson, California. The LACOFD has an estimated response time of 5 minutes and will provide primary fire protection, firefighting, and emergency response services to the Project Site. The LACOFD Fire Chief will perform a final fire safety inspection on completion of the construction and thereafter will conduct periodic fire safety inspections and training to Project employees. Before start-up, the LACOFD will be requested to visit the Project Site to become familiar with the site and with Project emergency response procedures.

Employees will be given fire safety training, including instruction in fire prevention, the use of portable fire extinguishers and hose stations, and the reporting of fires to the local fire department. Employees will only suppress fires in their incipient stage. Fire drills will be conducted at least twice each year for each work area.

5.17.3 Cumulative Impacts

As the various projects in the cumulative impact evaluation will be responsible for complying individually with applicable worker safety requirements, no cumulative impacts on worker safety are expected as a result of the Project.

5.17.4 Mitigation Measures

No environmental consequences related to worker safety are foreseen at this time; therefore, no additional measures beyond the implementation of the Construction and Operation Health and Safety Programs discussed above are considered necessary. No significant unavoidable adverse effects to worker safety are anticipated from the Project. Additional measures may be necessary should the Project change in a manner that affects worker safety.

5.17.5 Applicable Laws, Ordinances, Regulations, and Standards

The following LORS are applicable or potentially applicable to the Project in the context of the public and occupational safety and health protection measures addressed in this section and in Section 5.16, Public Health and Safety. The LORS applicable to worker safety are summarized in Table 5.17-4, Summary of LORS – Worker Safety.

**Table 5.17-4
Summary of LORS – Worker Safety**

LORS	Applicability	Administering Agency	Agency Contact	Conformance (AFC Section)
Federal Jurisdiction				
Occupational Health and Safety Act of 1970 (OSHA), 29 U.S.C. 651 <i>et seq.</i> ; 29 CFR 1910 <i>et seq.</i> ; 29 CFR 1926 <i>et seq.</i>	Meet employee health and safety standards for general industry and the construction industry.	DIR Cal/OSHA	Public Information 415-703-5070 Cal/OSHA Consultation Services 800-963-9424	5.17.5.1
Department of Labor, Safety and Health Regulations for Construction Promulgated Under Section 333 of the Contract Work Hours and Safety Standards Act, 40 U.S.C. 327 <i>et seq.</i>	Meet employee health and safety standards for construction activities. Requirements addressed by Title 8 CCR, General Construction Safety Orders.	DIR Cal/OSHA	Public Information 415-703-5070 Cal/OSHA Consultation Services 800-963-9424	5.17.5.1
NFPA	Meet standards necessary to establish a reasonable level of safety and property protection from the hazards created by fire and explosion.	LACOFD	P. Michael Freeman Fire Chief 323-881-2411	5.17.5.1
State Jurisdiction				
Title 8 CCR	Meet requirements for a safe and hazard-free work environment. Categories of requirements include General Industry Safety Orders, General Construction Safety Orders, and Electrical Safety Orders.	DIR Cal/OSHA	Public Information 415-703-5070 Cal/OSHA Consultation Services 800-963-9424	5.17.5.2
California Clean Air Act, California Health and Safety Code Section 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.	South Coast AQMD	909-396-3268	5.17.5.2
California Health and Safety Code Section 25500–25541; 19 CCR Sections 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.	South Coast AQMD	909-396-3268	5.17.5.2

**Table 5.17-4
Summary of LORS – Worker Safety**

LORS	Applicability	Administering Agency	Agency Contact	Conformance (AFC Section)
Local Jurisdiction				
LACOFD Health Hazardous Materials Division	Provide implementation of the Hazardous Materials Business Plan and Risk Management Plan	LACOFD, Health Hazardous Materials Division, CUPA	323-890-4045	5.17.5.3

Sources: California Department of Industrial Relations 2008 [2008a, 2008b]; California Department of Toxic Substances Control 2008; Cal/EPA 2008; LACOFD 2008; City of Carson, Department of Public Works 2008; LACOFD Health Hazardous Materials Division 2008; South Coast AQMD 2008.

Notes:

AQMD	=	Air Quality Management District
CCR	=	California Code of Regulations
CEC	=	California Energy Commission
CFR	=	Code of Federal Regulations
CUPA	=	Certified Unified Program Agency
DIR	=	Department of Industrial Relations
Cal/OSHA	=	Division of Occupational Safety and Health
LACOFD	=	Los Angeles County Fire Department
LORS	=	laws, ordinances, regulations, and standards
NFPA	=	National Fire Protection Association
U.S.C.	=	United States Code

5.17.5.1 Federal

Occupational Safety and Health Act of 1970 (OSHA), 29 U.S.C. 651 et seq.; 29 CFR 1910 et seq.; and 29 CFR 1926 et seq.

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

Under the Operational Status Agreement of 5 October 1989 between the federal Occupational Safety and Health Administration (OSHA) and the California Department of Industrial Relations, Division of Occupational Safety and Health (i.e., Cal/OSHA), the state resumed full enforcement responsibility for most of the relevant federal standards and regulations (55 Federal Register 18610 [12 July 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 agency for the above authority is OSHA (Cal/OSHA).

Department of Labor, Safety and Health Regulations for Construction Promulgated Under Section 333 of the Contract Work Hours and Safety Standards Act, 40 U.S.C. 327 et seq.

This act establishes safety and health regulations for construction. The requirements for this regulation are all addressed in Title 8 California Code of Regulations, Chapter 4, Subchapter 4, General Construction Safety Orders.

The administering agency for the above authority is OSHA (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 California Health and Safety Code. However, the fire code does contain independent provisions regarding fire protection and neutralization systems for emergency venting (Section 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 LACOFD.

National Fire Protection Association

The NFPA prescribes the 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 equipment.

The administering agency for the above authority is LACOFD.

Compliance

The Applicant will comply with all federal LORS by developing appropriate plans and policies as well as by the measures described in Section 5.17.2, Environmental Consequences, and Section 5.17.4, Mitigation Measures.

5.17.5.2 State

Title 8 California Code of Regulations

This authority prescribes general occupational safety and health regulations and standards as well as construction and industrial safety regulations, standards, and orders. The Project will comply 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). These regulations 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 that Cal/OSHA must perform. Title 8 CCR 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 an HMBP. The HMBP includes the basic information on the location, type, quantity, and health risks of the hazardous materials handled, stored, used, or disposed of that could be accidentally released into the environment. The HMBP 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. In addition, the HMBP 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 California Environmental Protection Agency, and the designated local administering agency for review and approval. The RMP includes an evaluation of the potential effects 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 program was developed in 2003 and supersedes the California RMP is known as the California Accidental Release Program.

Compliance

The Applicant will comply with all state LORS by developing and updating appropriate plans and policies as well as by the measures described in Section 5.17.2, Environmental Consequences, and Section 5.17.4, Mitigation Measures.

5.17.5.3 Local

LACOFD Health Hazardous Materials Division, CUPA

This office provides for the implementation of the HMBP and the RMP.

Compliance

The Applicant will comply with all local LORS, will develop an HMBP for construction, and will update the existing HMBP for operation of the Project. The Applicant will also update the existing Watson Cogeneration Facility RMP to incorporate Project operation. In addition, the Applicant will ensure continued compliance by updating the appropriate plans and policies as well as by the measures described in Section 5.17.2, Environmental Consequences, and Section 5.17.4, Mitigation Measures.

5.17.5.4 Agencies and Agency Contacts

Agencies with jurisdiction to issue applicable permits and/or enforce LORS related to worker safety are shown in Table 5.17-5, Agency Contact List for LORS.

**Table 5.17-5
Agency Contact List for LORS**

Agency	Contact	Address	Telephone
LACOFD Health Hazardous Materials Division, CUPA	Hazardous materials specialist on call	5825 Rickenbacker Road Commerce, CA 90040	323-890-4045
LACOFD	P. Michael Freeman Fire Chief	Fire Station # 127 2049 East 223 rd Street Carson, CA	323-881-2411
Cal/OSHA District Office	District Manager	Torrance Office 680 Knox Street, Suite 100 Torrance, CA 90502	310-516-3734
Cal/OSHA Pressure Vessel Unit	Pressure vessel engineer	Southern Office Santa Ana PV District Office Suite 215 2000 East McFadden Avenue Santa Ana, CA 92705	714-567-7208

Source: LACOFD, Health Hazardous Materials Division 2008.

Notes:

Cal/OSHA = Division of Occupational Safety and Health

CUPA = Certified Unified Program Agency

LACOFD = Los Angeles County Fire Department

PV = Pressure Vessel Unit

5.17.5.5 *Applicable Permits*

The permits required for this Project are listed in Table 5.17-6, Applicable Permits. An HMBP will be developed before Project construction and will be updated before Project operation. Required Cal/OSHA permits will be obtained from the Cal/OSHA District Office.

**Table 5.17-6
Applicable Permits**

Responsible Agency	Permit/Approval	Schedule
Federal	None required	N/A
State	None required	N/A
LACOFD, Health Hazardous Materials Division, CUPA	Hazardous Materials Business Plan	Update 30 days before the storage and use of hazardous materials for the Project
LACOFD, Health Hazardous Materials Division, CUPA	Risk Management Plan	Update before use of ammonia for Project Operation.
Cal/OSHA	Trenching or Excavation Permit	Before commencing construction
Cal/OSHA	Pressure Vessel Permit	Before installation of pressure vessel.

Source: LACOFD, Health Hazardous Materials Division 2008.

Notes:

Cal/OSHA = Division of Occupational Safety and Health

CUPA = Certified Unified Program Agency

LACOFD = Los Angeles County Fire Department

N/A = not applicable

5.17.6 References

- American Conference of Governmental Industrial Hygienists. 1996. Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices.
- CCR (California Code of Regulations). No date. Title 8. "General Industry Safety Orders, Construction Safety Orders, and High Voltage Electrical Safety Orders."
- California Department of Industrial Relations. 2008a. Information downloaded from http://www.dir.ca.gov/occupational_safety.html.
- California Department of Industrial Relations. 2008b. Information downloaded from <http://www.dir.ca.gov/dosh/DistrictOffices.htm>
- California Department of Toxic Substances Control. 2008. Information downloaded from: <http://www.dtsc.ca.gov/>. March 2008.
- Cal/EPA (California Environmental Protection Agency). 2008. Website <http://www.calepa.ca.gov/>.
- Los Angeles Regional Water Quality Control Board. 2008. Information downloaded from: <http://www.waterboards.ca.gov/losangeles/>. March 2008.
- City of Carson, Department of Public Works. 2008. Information downloaded from: http://ci.carson.ca.us/content/department/dev_service/publicworks.asp. June.
- CFR (Code of Federal Regulations). No date. Title 29 Part 1910. "Construction Safety Orders".
- CFR (Code of Federal Regulations). No date. Title 29 Part 1926. "General Industry Safety Orders".
- LACOFD (Los Angeles County Fire Department). 2008. Information downloaded from: <http://www.fire.lacounty.gov/Contacts.asp>. June.
- LACOFD (Los Angeles County Fire Department) Health Hazardous Materials Division. 2008. Los Angeles County Fire Department. Information downloaded from: <http://www.fire.lacounty.gov/HealthHazMat/HHMDContacts.asp>. June.
- NFPA (National Fire Protection Association). 1994. *A Compilation of NFPA Codes, Standards, Recommended Practices and Guides*. Quincy, Massachusetts.
- National Safety Council. 1992. Accident Prevention Manual. Volume 2, Chapter 6, Fire Protection, pp. 1324-1386.
- South Coast AQMD (Air Quality Management District). 2008. Information downloaded from: <http://www.aqmd.gov/>. June.

Adequacy Issue: Adequate Inadequate **DATA ADEQUACY WORKSHEET** Revision No. 0 Date _____

Technical Area: **Worker Safety** Project: Watson Cogeneration Steam and Electric Technical Staff: _____

Project Manager: _____ Docket: Reliability Project Technical Senior: _____

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the Project, the measures proposed to mitigate adverse environmental impacts of the Project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Section 5.17.1; pages 5.17-1 through 5.17-2 Section 5.17.2; pages 5.17-2 through pages 5.17-15 Section 5.17.3; page 5.17-15 Section 5.17.4; pages 5.17-15		
Appendix B (g) (1) (A)	A description of the safety training programs which will be required for construction and operation personnel.	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		
Appendix B (g) (1) (B)	A complete description of the fuel handling system and the fire suppression system.	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		
Appendix B (g) (1) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		

Adequacy Issue: Adequate Inadequate **DATA ADEQUACY WORKSHEET** Revision No. 0 Date _____

Technical Area: **Worker Safety** Project: Watson Cogeneration Steam and Electric Reliability Project Technical Staff: _____

Project Manager: Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	Construction Health and Safety Program: * Injury and Illness Prevention Plan (8 Cal. Code Regs., Section 1509);	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		
	* Fire Protection and Prevention Plan (8 Cal. Code Regs., Section 1920);	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		
	* PPE Program (8 Cal. Code Regs., Sections 1514-1522)	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		
	Operation Health and Safety Program: * Injury and Illness Prevention Program (8 Cal. Code Regs., Section 3203);	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		
	* Fire Prevention Plan (8 Cal. Code Regs., Section 3221);	Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15		

Adequacy Issue: Adequate Inadequate **DATA ADEQUACY WORKSHEET** Revision No. 0 Date _____

Technical Area: **Worker Safety** Project: Watson Cogeneration Steam and Electric Reliability Project Technical Staff: _____

Project Manager: _____ Docket: _____ Technical Senior: _____

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	<p>* Emergency Action Plan (8 Cal. Code Regs., Section 3220);</p>	<p>Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15</p>		
Appendix B (i) (1) (A)	<p>PPE Program (8 Cal. Code Regs., Sections 3401-3411).</p>	<p>Section 5.17.2.1; pages 5.17-3 through pages 5.17-7 Section 5.17.2.2; pages 5.17-7 through pages 5.17-15</p>		
Appendix B (i) (1) (B)	<p>Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed Project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and</p>	<p>Section 5.17.5; pages 5.17-15 through pages 5.17-20 Section 5.17.5, Table 5.17-4; pages 5.17-16 through pages 5.17-17</p>		
Appendix B (i) (1) (B)	<p>Tables which identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.</p>	<p>Section 5.17.5; pages 5.17-15 through pages 5.17-20 Section 5.17.5, Table 5.17-4; pages 5.17-16 through pages 5.17-17</p>		

Adequacy Issue: Adequate Inadequate **DATA ADEQUACY WORKSHEET** Revision No. 0 Date _____

Technical Area: **Worker Safety** Project: Watson Cogeneration Steam and Electric Technical Staff: _____

Reliability Project

Project Manager: Docket: _____

Technical Senior: _____

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff.	Section 5.17.5; pages 5.17-15 through 5.17-20 Section 5.17.5, Table 5.17-4; pages 5.17 16 through 5.17-17 Section 5.17.5.4, Table 5.17-5; page 5.17-20		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.17.5.5; page 5.17-20 Section 5.17.5.5, Table 5.17-6; page 5.17-20		