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PROJECT MEMORANDUM
SCE WEST OF DEVERS UPGRADE PROJECT

Date: February 26, 2019
To: John Forsythe, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Subject: Monitoring Report #51: February 10 to February 16, 2019

Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison’s (SCE) West of Devers (WOD) Upgrade Project. As of the closing of this monitoring period, SCE estimates total project completion at approximately 20%.

CPUC Environmental Monitor (EM): CPUC EM, Brady Daniels, was onsite February 12-14, 2019.

CPUC Notices to Proceed (NTPs)

Table 1 summarizes the NTPs with construction for the WOD Upgrade Project.

Table 1 - NTPs
(Updated 02/26/19)

NTP #	Date Requested	Date Issued	Phase	Description
NTP #1	04/04/17	06/29/17	Material Yards	Construction or use of 10 Material Yards
NTP #2	05/18/17	06/29/17	Substation Upgrades	Upgrades to 5 existing Substations
NTP #3	06/05/17	08/10/17	Distribution, Subtransmission, and Telecom	Construction of the Distribution, Subtransmission, and Telecommunication portions of the Project
NTP #4	07/13/17	09/05/17	Transmission	Transmission Line Construction on private lands
NTP #5	08/07/17	03/29/18	Construction on BLM lands	Transmission Line construction on BLM lands

Construction & Compliance

A summary of construction and compliance activities is provided below by NTP.

Material Yards (NTP #1)

As defined in NTP #1, Project material yards (MY) include:

- Mountain View #1 MY
- Lugonia MY
- Grand Terrace MY
- Poultry MY
- San Timoteo MY
- Beaumont #1 MY

- Beaumont #2 MY
- Matich MY
- Hathaway #2 MY
- Devers MY

To date, all material yard pre-compliance materials associated with NTP #1 that have been submitted have been approved.

Summary of Construction Activity

1. For the currently approved MYs, all activities are being performed by the contractor operating out of each respective yard. No MY construction activities were conducted during the subject reporting period.
2. The Poultry MY is being utilized by Barnard Construction and Power Grade Incorporated as their primary base of operations and material/equipment storage location. Work associated with the Poultry MY included material/equipment deliveries and general yard maintenance throughout the monitoring period. Helicopter operations out of Poultry MY occurred during the monitoring period.
3. The Matich MY is being utilized by Barnard Construction primarily for tubular steel pole (TSP) storage. Work associated with the Matich MY included material/equipment deliveries throughout the monitoring period.
4. The Mountain View #1 MY is being utilized by Hot Line Construction as their primary base of operations and materials/equipment storage location.
5. The Beaumont #2 MY is being utilized by CJ/Aldridge Drilling as their primary base of operations and material/equipment storage location. Material/equipment deliveries and general yard maintenance occurred at the Beaumont #2 MY throughout the monitoring period.
6. The Grand Terrace MY will be used primarily as a show-up location for project construction crews.
7. No project-related activities occurred at the Devers MY throughout the monitoring period.

Environmental Compliance

1. There was one SCE self-reported incident and no CPUC incidents documented for construction activities associated with NTP #1 throughout the monitoring period. On February 15, the SCE Biological Monitor observed a tubular steel pole (TSP) that had slid outside of approved work limits due to saturated conditions at the Devers MY (see Photo 1). The TSP entered a jurisdictional feature immediately adjacent to the eastern fence line of the material yard. SCE reported that no impacts to sensitive resources were identified as a result of this incident.
2. There was one SWPPP maintenance items associated with NTP #1 during the monitoring period documenting excess sediment on the driveway and damaged BMPs at the Matich MY. According to SCE's Weekly Compliance Report, the issues had all been resolved at the time of this report. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #1.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #1 identified during the monitoring period.
4. No new nests were reported during the monitoring period. To date, there are no active nests located within work areas associated with NTP #1. If required, management, including the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project Nesting Bird Management Plan (NBMP).
5. No special-status species were observed or reported at locations associated with NTP #1 during the monitoring period.

Substations (NTP #2)

Five substations are identified for improvements in NTP #2. These include:

- Etiwanda Substation
- San Bernardino Substation
- Vista Substation
- El Casco Substation
- Devers Substation

To date, all pre-compliance materials associated with NTP #2 that have been submitted have been approved.

Summary of Construction Activity

1. For the currently approved substation components, all work is being managed by Circle Wood Services with construction support from TTR Substations.
2. Work at the Vista Substation included preparation to pull control cable inside the MEER room.
3. No construction activities associated with the other substations (San Bernardino, Devers, Etiwanda, and El Casco) occurred throughout the monitoring period.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #2 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #2 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #2.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #2 identified during the monitoring period.
4. One new nest was reported at locations associated with NTP #2 during the monitoring period. As of the end of the subject reporting period, there were three active nests (red-tailed hawk, red-shouldered hawk) located within work areas associated with NTP #2 and the required buffers have been implemented. If required, management, including the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project NBMP.
5. No special-status species were observed or identified at locations associated with NTP #2 during the monitoring period.

Distribution, Subtransmission, and Telecommunication Work (NTP #3)

As defined in NTP #3, distribution improvements consist of three work packages. The construction status of each is also presented. These include:

- Dental 12-kV Distribution Circuit (Dental Circuit) – Substantially complete, some restoration remaining.
- Intern 12-kV Distribution Circuit Underbuild (Intern Circuit) – Substantially complete, some restoration remaining.
- Reconductor on Juanita Street (Juanita Reconductor) – Substantially complete, some restoration remaining.

As defined in NTP #3, subtransmission improvements consist of three work packages. The construction status of each is also presented. These include:

- Removal of San Bernardino–Redlands-Timoteo and the San Bernardino–Redlands-Tennessee 66-kV Lines (Timoteo-Tennessee Removal) – Approximately 60% complete; expected completion in February 2019.
- Relocation of San Bernardino–Redlands-Timoteo 66-kV Lines (Timoteo Relocation) – Near completion; one Hotline splice remaining before SCE can do the final splice work at Bryn Mawr and Redlands Boulevard.
- Relocation of San Bernardino–Redlands-Tennessee 66-kV Lines (Tennessee Relocation) – Substantially complete; some restoration remaining.

As defined in NTP #3, telecommunication improvements consist of six work packages. The construction status of each is also presented. These include:

- San Bernardino Substation Connection to Redlands Inland Empire District Office (San Bernardino Connection) – Near completion; outage required to transfer the circuit to the new cable and remove the old cable.
- Timoteo-Redlands District Office Fiber Optic Cable Connection (Timoteo-Redlands Connection) – Approximately 90% complete; expected completion February 2019.
- El Casco Substation Connection to Vista Moreno OPGW (El Casco Connection) – OPGW telecom stringing along San Timoteo Canyon Road is approximately 40% complete. Work is expected to be completed by mid-January.
- Maraschino Substation Connection to Devers-Valley OPGW (Maraschino Connection) - Complete
- El Casco–Banning Connection to Devers-Vista Skywrap (El Casco–Banning Connection) - Complete
- Banning Substation Connection to Devers-Valley OPGW (Banning Connection) - Complete

To date, all telecommunication, distribution, and subtransmission pre-compliance materials associated with NTP #3 have been submitted and approved.

Summary of Construction Activity

1. For the currently approved subtransmission and distribution components, major construction activities are being performed by Hot Line Construction and SCE crews.
2. Subtransmission work associated with the Timoteo Relocation included a single pole replacement.
3. Telecom work associated with the El Casco Connection included installation and clipping of fiber optic line along San Timoteo Canyon Road.
4. As of the closing of this monitoring period, the construction progress of components associated with NTP #3 is as follows:
 - For distribution components, all 19 12-kV poles have been framed, all 12 12-kV underground vaults have been installed, and 7430 feet of 12-kV duct bank (conduit) and 10,670 feet of 10,760 feet of 12-kV conductor wire has been installed.
 - For subtransmission components, 119 of 119 66-kV LWTSPs have been erected, 19 of 19 TSPs have been erected, and 25,610 feet of 66-kV wire has been installed. Both the Timoteo and Tennessee circuits have been energized. Wreck-out of the existing subtransmission infrastructure is underway.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #3 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #3 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #3.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #3 identified during the monitoring period.
4. No new nests were reported during the monitoring period. To date, there is one active nest (golden eagle) located within work areas associated with NTP #3 for which the required buffer has been established and no work is planned for the area. If required, management, including the removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP.
5. No special-status species were observed or identified at locations associated with NTP #3 during the monitoring period.

Transmission Work (NTP #4)

NTP #4 includes six transmission line segments, identified as Segments 1 through 6, generally moving from west to east.

To date, pre-compliance materials associated with NTP #4, Segments 1 through 6, have been submitted and approved.

Summary of Construction Activity

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work. Abercrombie Services is assembling and erecting new towers, and conducting wire operations with support from Summit Helicopters. Cunningham Davis Corporation is removing existing towers and foundations.
2. Work associated with Segment 1 included minor road grading near Site 1X03 and wire stringing at Sites 1X03, 1X06, 1X08, 1X10, 1X11, 1X13, 1X16, 1X18, and 1X19.
3. Work associated with Segment 2 included installation of BMPs at Sites 2X10, 2X11, and 2X12.
4. Work associated with Segment 3 included access road grading/maintenance at numerous locations along the alignment. Vegetation removal was conducted at Sites 3X31 and 3X40. Grading activities were performed at Sites 3N03, 3N04, 3X03, 3X32, 3X40, 3X42, 3X64, and 3X65. Drilling operations were conducted at Sites 3N03, 3N04, 3X06-07, 3X33, 3X37, 3X38, and 3X63. Activities associated with wreck-out of existing towers occurred at Sites 3X13, 3X14, 3X16, 3X17, and 3X24 through 3X29. Tower assembly occurred at Sites 3N02, 3N03, 3N04, 3S04, 3X06-07, 3X14, 3X29, 3X55, 3X57, 3X59, and 3X61. Wire stringing activities were conducted at Site 3N02 (see Photo 2).
5. Work associated with Segment 4 included BMP maintenance and site clean-up at various locations.
6. To date, no construction activities associated with Segments 5 or 6 have occurred.
7. As of the closing of this monitoring period, construction progress associated with NTP #4 is as follows:
 - 1.4 miles of minor road maintenance was completed in Segment 2, 1.6 miles in Segment 3, and 1.1 miles in Segment 4.

- Grading for foundation installation has been completed at 127 sites.
 - Foundations are completed for 91 of 386 lattice towers and 2 of 83 TSPs.
 - Erection of 13 of 386 lattice towers and 2 of 83 TSPs have been completed.
 - Erection of 44 temporary shoofly locations has been completed.
 - Stringing of approximately 2.3 of 8.0 circuit miles of shoofly conductor and 2.1 of 184.0 circuit miles of mainline conductor has been completed.
 - Demolition of 44 of 602 existing structures and 41 of 415 existing foundations has been completed.
 - Wire wreck-out has been completed along 11.8 circuit miles.
8. The first proposed outage (Project Move 2) began on October 1, 2018 and has been completed. Project Move 1 in Segment 1 was completed December 22, 2018. Project Move 3 in Segment 3 began January 7, 2018 and will continue through April 26, 2019.

Environmental Compliance

1. Two SCE self-reported compliance incidents and two CPUC compliance incidents were documented for construction activities associated with NTP #4 during the monitoring period. On February 11, the SCE Biological Monitor observed a project crane that had slid off the access road to Site 3X06-07 and into an unapproved area (see Photo 3). In order to safely extract the crane, equipment was staged in an additional unapproved area adjacent to the location of the incident. According to SCE, no sensitive resources were impacted and the affected areas were recorded using a Trimble instrument; however, the quantity of impacted area was not included in SCE's Incident Report. On February 12, the SCE Biological Monitor and CPUC Lead Compliance Monitor observed excess fugitive dust generated by project vehicles along the access road to Site 3X06-07. On February 12, the CPUC Lead Compliance Monitor and CPUC Compliance Monitor observed offsite sediment discharge into a jurisdictional feature along the access road to Site 3X06-07 at a low point in the shoulder where recent grading, dewatering, fill import had occurred (see Photo 4). The incident was relayed to the SCE Biological Monitor; however no self-reported incident was generated. Additional BMPs were installed at the location by the end of the day, but had been overwhelmed by sediment laden water during a subsequent observation by the CPUC Monitors on February 14.
2. The CPUC EM noted locations along Segment 3 where access road grading had resulted in the blockage of MacCarthy drains and notified SCE (see Photo 5). Subsequently, the drains were cleared by construction crews.
3. SCE provided documentation of coordination with the City of Redlands and San Bernardino County for work on Sunday, February 10 and with the City of Loma Linda for night work on Monday, February 11 in Segment 1.
4. SCE provided documentation of FAA filings for the project on September 17 and September 26; FAA concurrence will be required prior to tower installation where applicable. Additional information was provided February 11, 2019. FAA recommended marker balls have been installed on the shoofly spans near El Casco Substation.
5. Nine SWPPP maintenance items were presented in the SCE Weekly Compliance Report associated with NTP #4 during the subject period. These items were recorded in Segments 2, 3, and 4, and included the removal of excess sediment accumulated on BMPs and the repairs of erosion damage along access roads. According to SCE's Weekly Compliance Report, four of the issues had been resolved at the time of this report. To date, there are five open SWPPP maintenance items or corrective actions associated with NTP #4.

6. One reportable (> 1 gallon) and two non-reportable (< 1 gallon) spills associated with NTP #4 were identified during the monitoring period. According to SCE's Spill Report, the reportable spill occurred along the access road between Sites 3X37 and 3X38 and consisted of approximately 1.5 gallons of hydraulic fluid (see Photo 6). Contaminated soils were contained and removed offsite. According to SCE's Spill Reports, the two non-reportable spill occurred at Sites 3X38 and 3X39 and consisted of approximately 4 pints and one-half gallon of hydraulic fluid. Contaminated soils were contained and removed offsite.
7. One new nest was reported at locations associated with NTP #4 during the monitoring period. To date, there are five active nests (red-tailed hawk, Anna's hummingbird) located within work areas associated with NTP #4. Buffers have been established per the Project NBMP. If required, management, including the removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP.
8. Special-status species identified during the monitoring period at locations associated with NTP #4 included golden eagle and burrowing owl.

Transmission Work BLM Lands (NTP #5)

NTP #5 includes the portion of one transmission line segment, identified as Segment 6, which traverses properties managed by the Bureau of Land Management (BLM). NTP #5 was approved by BLM on March 29, 2018. The preconstruction compliance package for BLM lands was deemed acceptable by BLM on February 5. To date, no work authorized by NTP #5 has occurred.

Temporary Extra Workspaces (TEWS) and Minor Project Refinements (MPRs)

Table 2 summarizes the TEWS and MPRs for the WOD Upgrade Project to date.

Table 2 - TEWS & MPRs
(Updated 02/26/19)

TEWS / MPC	Date Requested	Date Issued	Phase	Description
Temporary Extra Workspaces (TEWS)				
TEWS #1	10-12-17	10-19-17	Maraschino Connection	Access to Beaumont Cherry Valley District water hydrant meter located near the intersection of Highland Springs Avenue and Crooked Creek, Beaumont.
TEWS #2	11-13-17	11-21-17	El Casco–Banning Connection	Water source on Oak Valley Boulevard.
TEWS #3	12-15-17	12-15-17	Banning Connection	Access to existing poles off of Lincoln Street.
TEWS #4	12-18-17	12-18-17	Banning Connection	Access to existing poles off of Wesley Street.
TEWS #5	12-20-17	12-21-17	Banning Connection	Access to existing poles at intersection of Wesley Street and Old Idyllwild Road
TEWS #6	6-13-18	6-13-18	Timoteo Relocation	Extra workspace to facilitate erection of TSP #4696058 at intersection of Redlands Boulevard and Bryn Mawr Street

TEWS / MPC	Date Requested	Date Issued	Phase	Description
TEWS #7	7-27-18	7-30-18	Timoteo Relocation	Extra workspace to facilitate wire pulling activities along Research Drive and Almond Avenue
TEWS #8	8-27-18	8-28-18	Dental/Intern Circuits	DENIED AND RESCINDED – Extra workspace to facilitate construction along Mission Road
TEWS #9	10-18-18	10-19-18	Timoteo Relocation	Extra workspace for walking path at Bryn Mawr and I-10
TEWS #10	11-05-18	11-05-18	Timoteo Relocation	Extra workspace along Barton and Mountain View Roads for cutover operations.
TEWS #11	01-30-19	01-31-19	Timoteo Relocation	Extra workspace to facilitate the removal of fiber optic cable from overhead poles north along Mountain View Avenue and east along Redlands Boulevard.
TEWS #12	02-06-19	02-07-19	Timoteo Relocation	Extra workspace along Mountain View Avenue for subtransmission pole removal.
TEWS #13	02-26-19	02-26-19	Segment 3	Temporary access road detour for vehicle and equipment travel to/from San Timoteo Canyon Road and Tower Site 3X41.
Minor Project Refinements (MPRs)				
MPR #1	11-17-17	11-22-17	Maraschino Connection	Revisions to the amount of new underground telecom construction.
MPR #2	12-13-17	12-15-17	Maraschino Connection	Addition of two vault work areas on Highland Springs Road.
MPR #3	12-21-17	12-28-17	El Casco– Banning Connection	Adjustments to alignment along Oak Valley Parkway
MPR #4	12-27-17	1-3-18	Maraschino/ El Casco– Banning Connections	Continued use of two fire hydrants previously approved as TEWS #1 and TEWS #2
MPR #5	1-16-18	1-22-18	Banning Connection	Continued use of access routes described in TEWS #3, 4, and 5 and temporary access paths through private property along Coyote Trail
MPR #6	2-8-18	2-12-18	Project-wide	Use of 10 water sources to support construction activities
MPR #7	2-23-18	2-28-18	Poultry MY	Temporary water and electrical supply to yard
MPR #8	2-27-18	3-2-18	El Casco Connection/ Segment 1	New telecom splice location and single new steel pole installation
MPR #9	3-26-18	3-27-18	El Casco Connection	Telecom work areas along El Casco Substation access road

TEWS / MPC	Date Requested	Date Issued	Phase	Description
MPR #10	4-6-18	4-9-18	Mountain View #1 MY/All subtrans	Additional work spaces at Mountain View #1 MY entry and at subtransmission improvements work areas
MPR #11	5-4-18	5-8-18	Tennessee Relocation	Relocation of 5 subtransmission structures from the east side to the west side of Nevada Street
MPR #12	5-14-18	5-16-18	Timoteo Relocation	Additional work space for TSP erection at Bryn Mawr Avenue and Interstate 10.
MPR #13	5-23-18	5-25-18	Project-wide	Addition of encased fire hose to O'Grady Court water source and use of 17 water sources to support construction activities
MPR #14	5-24-18	5-31-18	Timoteo/ Tennessee Relocations	Location shift of 3 TSPs and 1 vault location
MPR #15	5-31-18	6-4-18	Poultry MY	Paving of access road and trailer complex area
MPR #16	6-11-18	6-13-18	Banning Connection	Shift of horizontal directional drilling (HDD) alignment through Smith Creek and addition of walking paths along Coyote Trail
MPR #17	6-20-18	6-22-18	Dental Circuit/ Tennessee Relocation	Additional work space along Mission Road, Lugonia Avenue, and Nevada Street
MPR #18	8-3-18	8-7-18	Timoteo Relocation/ Beaumont #2 MY	Expansion of vault installation work area off Mountain View Avenue and new water source near Beaumont #2 MY
MPR #19	8-13-18	8-20-18	Segment 4	Additional work space requests at Sites 4N58, 4N59, and 4N64
MPR #20	8-21-18	8-27-18	Banning Connection	Use of unpaved access road west of Smith Creek
MPR #21	10-4-18	10-10-18	Project-wide/ Segments 3&4	Use of 6 water sources, installation of water tank, use of access road, and expansion of WSS
MPR #22	11-19-18	11-20-18	Subtrans and Telecom	Pole replacement, switch replacement, and shift in underground telecom route.
MPR #23	12-11-18	12-21-18	Transmission	Site 3N32 and Move 3 work areas.
MPR #24	01-15-19	01-28-19	Transmission	Additional Wire Stringing Site in Segment 1.

CPUC Compliance Incidents, Project Memoranda (PMs) and Non-Compliance Reports (NCRs)

Table 3 summarizes the CPUC Incidents, PMs, and NCRs issued to date.

Table 3
CPUC Incidents, Project Memoranda, and Non-Compliance Reports
 (Updated 02/26/19)

Incident/PM/NCR	Regulatory Requirement	Date Issued	Phase	Description
Level 1 Incident	Traffic Control Plan	01-30-18	Banning Connection	Traffic control was set up in such a way that diverted flow into active work area and deviated from approved Traffic Control Plan.
Level 1 Incident	MM WIL-1b	04-19-18	Timoteo/Tennessee Relocation	A portable water tank was observed uncovered for four consecutive days.
Level 1 Incident	MM VEG-1a	5-24-18	El Casco Substation	Equipment was staged outside of approved disturbance limits for at least 1-2 days.
Level 1 Incident	MM AQ-1a	8-15-18	Banning Connection	Fugitive dust observed from construction activities.
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved access road.
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved staging area.
Level 1 Incident	Fire Management Plan	9-18-18	Segment 4	Lack of adequate fire abatement equipment at 3 locations.
Level 1 Incident	Fire Management Plan	9-20-18	Segment 4	Lack of adequate fire abatement equipment
Level 1 Incident	HH-1a	10-17-18	Segment 4	Lack of proper secondary containment for 4 pieces of equipment.
Level 1 Incident	N-1a	10-17-18	Segment 4	Work outside of approved hours
Level 1 Incident	WIL-1b	10-18-18	Grand Terrace MY	Lack of proper covering for pipes between 1.5" to 4"
Level 1 Incident	N-1a	10-18-18	Segment 4	Work outside of approved hours
Level 1 Incident	AQ-1a	10-30-18	Grand Terrace MY	Fugitive Dust Emissions Outside of Property Boundaries at the Grand Terrace Yard.
Level 1 Incident	WIL-1b	01-24-19	Segment 3	Pipes/tubing left open at Sites 3X08 and 3X10.
Level 1 Incident	AQ-1a	02-13-19	Segment 3	Fugitive dust along Segment 3 access road to 3X06.
Level 2 Incident	VEG-3a	02-13-19	Segment 3	Offsite sediment discharge from access road into JD ID 3054.

PROJECT PHOTOGRAPHS



Photo 1 – TSP slid off cribbing and into unapproved drainage along east fence of Devers MY (February 15, 2019) (photo courtesy of SCE).



Photo 2 – Wire stringing activities between Site 3N02 and El Casco Substation (Segment 3; February 12, 2019).



Photo 3 – Crane slid off access road to Site 3X06-07 into an unapproved area (Segment 3; February 11, 2019) (photo courtesy of SCE).



Photo 4 – Offsite sedimentation into jurisdictional feature along the access road to Site 3X06-07 (Segment 3; February 14, 2019).



Photo 5 – MacCarthy drain blocked as a result of grading along Segment 3 access road (Segment 3; February 13, 2019).



Photo 6 – Tracks of excavator covered to contain hydraulic fluid as a result of a reportable spill along the access road between Sites 3X37 and 3X38 (Segment 3; February 13, 2019).